



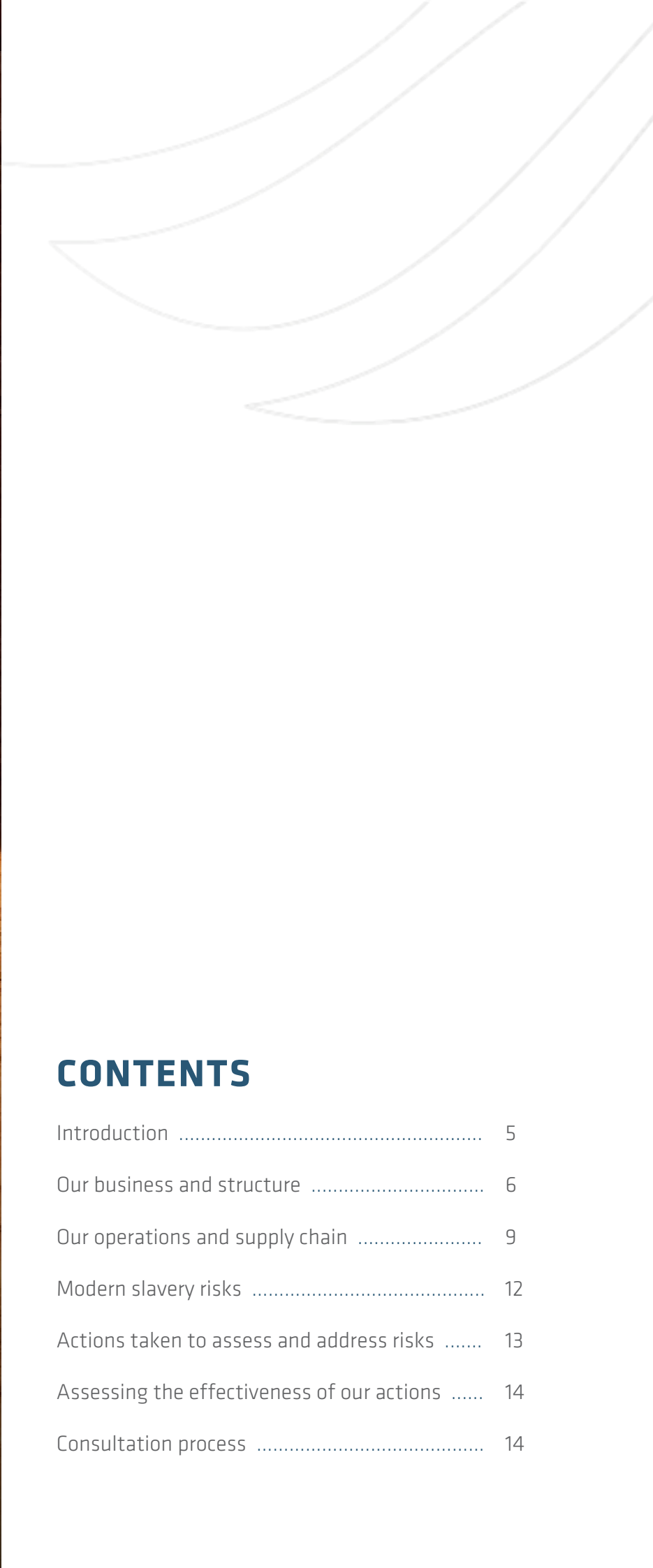
MODERN SLAVERY STATEMENT

2024-25



ACKNOWLEDGEMENT OF COUNTRY

Pilbara Ports acknowledges the Traditional Owners of the land and waters in which it operates – Kariyarra (Port Hedland), Thalanyji (Ashburton), Yaburara, Mardudhunera, Ngarluma, Wong-Goo-Tt-Oo, Yindjibarndi (Dampier), and Whadjuk Noongar (Perth) – and pays its respects to Elders past and present.



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OUR VISION

Our ports connect the possibilities of the Pilbara to the world so our customers and communities thrive

OUR VALUES

SAFETY

ensuring everyone goes home safe and healthy everyday

EXCELLENCE

taking pride in our work and striving to improve

TEAMWORK

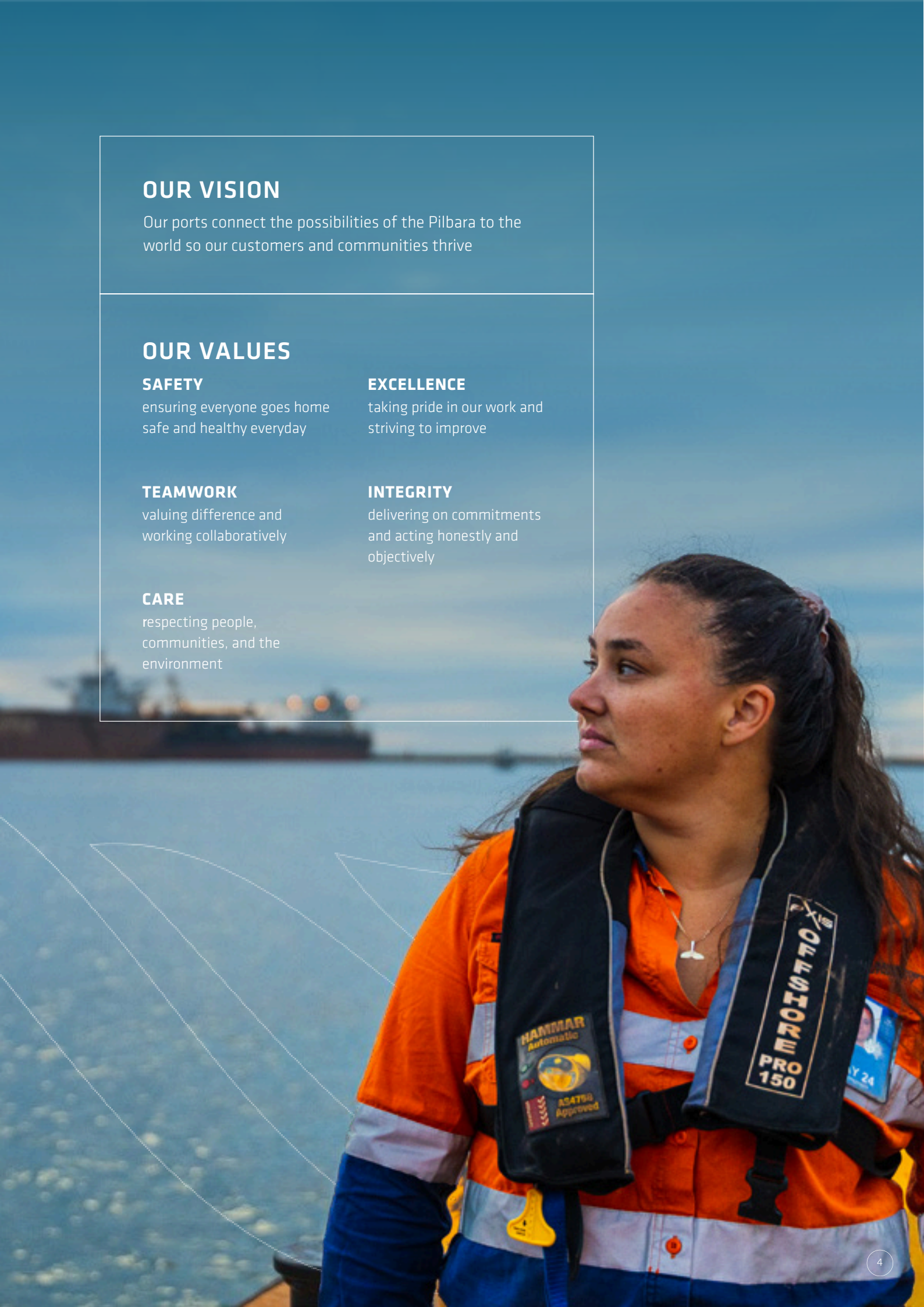
valuing difference and working collaboratively

INTEGRITY

delivering on commitments and acting honestly and objectively

CARE

respecting people, communities, and the environment





INTRODUCTION

The products we buy connect us to modern slavery^[1].

Addressing the issue of modern slavery is critical. However, with an ever more global economy, all countries have an increasing responsibility to review their purchasing practices to reduce the risks of modern slavery in supply chains, from the sourcing of raw materials to manufacturing, packaging and transportation of goods.

The equivalent of US\$17.4 billion of goods with a high risk of modern slavery were imported into Australia in 2023, with the top five at-risk products imported being electronics, fish, garments, solar panels and textiles^[1].

Most of these products and services are part of Pilbara Ports supply chains.

The term 'modern slavery' covers exploitative practices, including slavery, human trafficking, forced labour, debt bondage, domestic servitude, forced marriage and the sale and exploitation of children. Basically, any situation of exploitation where a person cannot refuse or leave because of threats, violence, coercion, deception or abuse of power^[2].

Even though Australia is party to seven core international human rights treaties^[3], most forms of modern slavery have or are suspected to have occurred in today's Australia^[4].

Pilbara Ports conducts its business ethically and in accordance with the highest standards of corporate governance.

We^[5] are committed to our values and Code of Ethics and Conduct, as well as providing information regarding our structure, operations, performance and strategy in a transparent and easily accessible manner.

This modern slavery statement has been prepared pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) (the Act) for the reporting period ending 30 June 2025.

It addresses the mandatory requirements under the Act and outlines the steps we have taken to ensure the effective management of modern slavery risks in our operations and supply chains. It also outlines the consultation process between Pilbara Ports and the Hedland Maritime Initiative Pty Ltd (HMI), which Pilbara Ports wholly owns.

Pilbara Ports Board of Directors has approved this modern slavery statement.

[1] Walk Free, Global Slavery Index (2023). Available from: www.walkfree.org [25/09/2023]

[2] Walk Free, What is modern slavery. Available from www.walkfree.org/what-is-modern-slavery/ [25/09/2023].

[3] Attorney-General's Department, International human rights system. Available from: international.humanrights.system | [Attorney-General's Department \(ag.gov.au\)](http://Attorney-General's.Department.ag.gov.au), [25/09/2023].

[4] Walk Free, Murky Water A qualitative assessment of modern slavery in the pacific region. Available from: <https://www.walkfree.org/reports/murky-waters/> [25/09/2023].

[5] Throughout the statement the terms: 'We, 'us' and 'our' are used to refer to the Pilbara Ports and its respective subsidiary the Hedland Maritime Initiative.

OUR BUSINESS AND STRUCTURE

Structure

Pilbara Ports operates as a Western Australian Government Trading Enterprise and is governed by the *Government Trading Enterprises Act 2023 (WA)* (the GTE Act) and the *Port Authorities Act 1999 (WA)* (the PA Act).

We are a commercialised entity with an independent Board of Directors reporting to the Minister for Ports and employ 395 people (as at 1 July 2025) across our operations and locations.

Ashburton Security Gate

Warrirda Rd, Onslow WA 6714

Corporate Office

Level 5, 999 Hay St, Perth WA 6000

Dampier Office

Mof Rd, Murujuga, Dampier WA 6713

Karratha Office

Level 1, The Quarter HQ 20 Sharpe Ave, Karratha WA 6714

Port Hedland Office

The Esplanade, Port Hedland WA 6721

HMI is a wholly owned subsidiary of Pilbara Ports. It operates (*as permitted under the PA Act*) as a corporatised entity established under the *Corporations Act 2001* with a Board of Directors.

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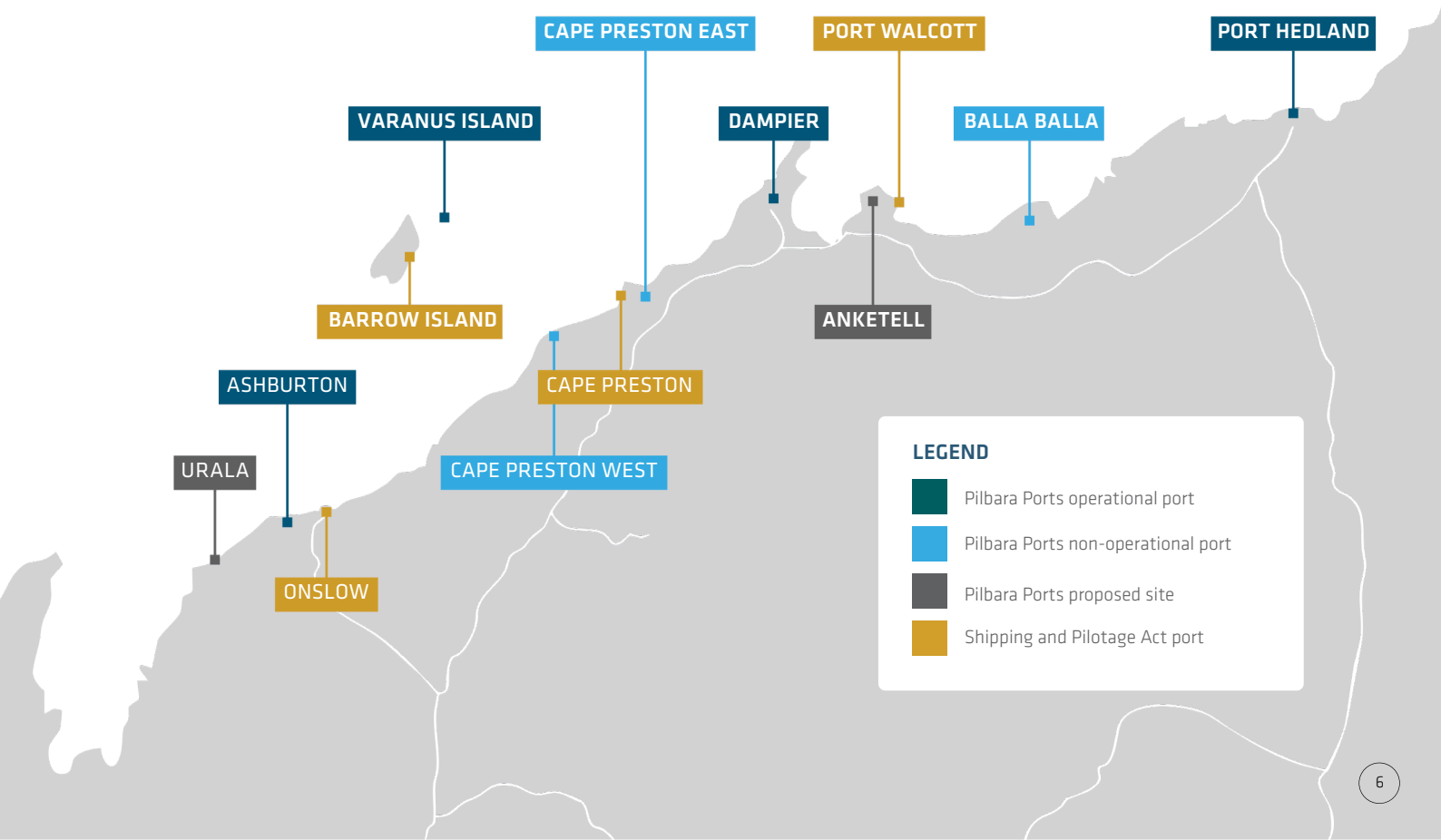
HMI employs approximately seven people across its operations and locations.

Corporate Office

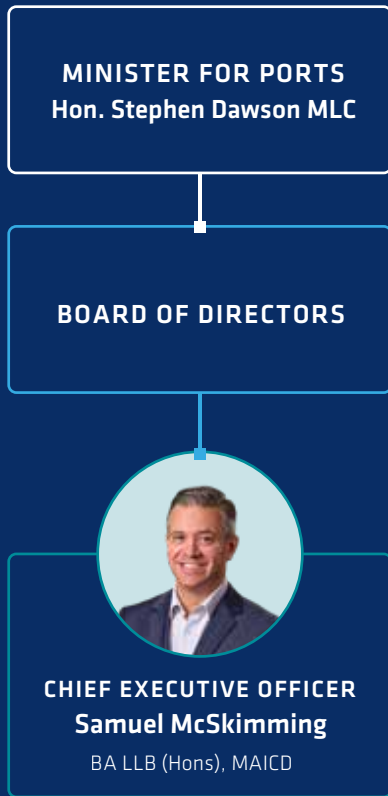
Level 5, 999 Hay St, Perth WA 6000

Port Hedland Office

6/15 Wedge St, Port Hedland WA 6721



ORGANISATION STRUCTURE



CHIEF FINANCIAL OFFICER
Nick Sarandopoulos

BCom, CA, Grad Dip App Fin, MBA, GAICD

- Finance
- Legal
- Risk and internal audit
- Finance business partnering
- Procurement



**EXECUTIVE GENERAL MANAGER
TERMINAL OPERATIONS**
Nick Perceval

Dip Project Management

- Port operations
- Maintenance
- Security
- Asset management
- Biosecurity



**EXECUTIVE GENERAL MANAGER CUSTOMER
AND STRATEGY**
Karlene Bylund

BCom, AssocDipAccounting, DipProjectManagement, GAICD

- Customer relationship management
- Enterprise strategy and market intelligence
- Sustainability
- Critical port services
- Hedland Maritime Initiative



EXECUTIVE GENERAL MANAGER MARINE
Philip Christy

Master Mariner

- Marine operations
- Marine pilotage services
- Vessel traffic services
- Dredging and surveying

ORGANISATION STRUCTURE



EXECUTIVE GENERAL MANAGER PLANNING AND PROPERTY

Nerida Peever

MBA, BJour, GradCert CD

- Integrated business planning
- Port planning and design
- Real estate



EXECUTIVE GENERAL MANAGER CORPORATE AFFAIRS

Clare Lugar

MComM, GradCertBus

- Community relations
- Brand management
- Corporate and internal communications
- External affairs and stakeholder relations



EXECUTIVE GENERAL MANAGER PROJECTS AND ENGINEERING

Nick Dawe

BSc (Hons), DipProjectManagement

- Infrastructure planning
- Project delivery
- Portfolio, program and project management



CORPORATE SECRETARY

Sue Moore

BCom, GAICD

- Corporate secretariat
- Board governance



EXECUTIVE GENERAL MANAGER SAFETY, PEOPLE AND ENVIRONMENT

Emma Fensom

MBA, BBus, GAICD

- Health and safety
- Human resources
- Environment and heritage
- First Nations engagement

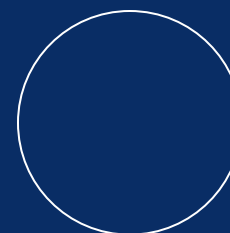


GENERAL COUNSEL

Richard Donaldson

LB, Grad Dip Leg Prac, Grad Dip IP Law, Wharton EDP, Wharton AMP

- Legal services
- Intellectual property
- Regulatory and compliance matters



EXECUTIVE GENERAL MANAGER TECHNOLOGY

Vacant

- Technology operations
- Business applications
- Information and collaboration services
- Technology programs delivery

OUR OPERATIONS AND SUPPLY CHAIN

Operations

Pilbara Ports is the world's largest bulk export port authority, encompassing the operating ports of Ashburton, Dampier, Porth Hedland and Varanus Island and five future port sites.

The ports of Dampier and Port Hedland are responsible for approximately 81 per cent of Australia's and more than 43 per cent of the world's iron ore trade.

Other major export commodities include liquefied natural gas (LNG) and salt. Approximately 34 per cent of Australia's exports and six per cent of global LNG trade are exported through the ports of Ashburton and Dampier.

Salt exports through the ports of Dampier and Port Hedland totalled approximately 5.3 million tonnes (Mt) in 2024-25, accounting for approximately 25 per cent of Australian salt mine production.

In addition, 7,099 twenty-foot equivalent units shipping containers were handled through the ports in direct shipping to/from the Pilbara.

Over the 2024-25 financial year, 775.7 million tonnes of throughput passed through the ports of Ashburton, Dampier, Port Hedland, and Varanus Island. We recorded 8,480 safe vessel visits which equates to an average of 23 safe vessel visits each day.

As of 30 June 2025, Pilbara Ports oversees 141,532 hectares of land and seabed across the operating ports of Ashburton, Dampier and Port Hedland and Varanus Island, and a further 76,752 hectares of tenure at the future ports of Anketell, Balla Balla, Cape Preston East, and Cape Preston West.

Pilbara Ports is also expecting to soon take over responsibility for the ports of Barrow Island, Cape Preston, Onslow and port Walcott. These ports are currently the responsibility of the Department of Transport and Major Infrastructure's responsibility under the *Ports Legislation Amendment Act 2019*.

Pilbara Ports also facilitates port-related industries by leasing and licensing land to third parties. As of 30 June 2025, a total of 1,703 hectares of land was leased to more than 55 port users.

Pilbara Ports is responsible for managing the ports, including vessel traffic services, ship scheduling, berthing allocations for multi-user facilities and port communications.

This includes pilot services, vessel movements, maintaining shipping channels, navigation aids and other port infrastructure. Third-party contracts or licences are issued for stevedoring, towage, pilotage, pilot transfer helicopters and pilot boat coordination, security services and waste management services.

Pilbara Ports is the parent entity of Hedland Maritime Initiative Pty Ltd (HMI), which was established to administer the Port Hedland Voluntary Buy-Back Scheme (PHVBS).

The objective of the PHVBS is to acquire residential properties in the West End of Port Hedland which supports a cap and reduction of the permanent residential population in the area.

Pilbara Ports operates as a Government Trading Enterprise (GTE) and is governed under the PA Act and the GTE Act. Read together, the PA Act and the GTE Act define a clear role for all GTEs and establish lines of accountability and reporting to the State Government.



Under the GTE Act, Pilbara Ports stated purpose is to advance the public benefit through the performance of its functions. Its functions are outlined in the PA Act and include to:

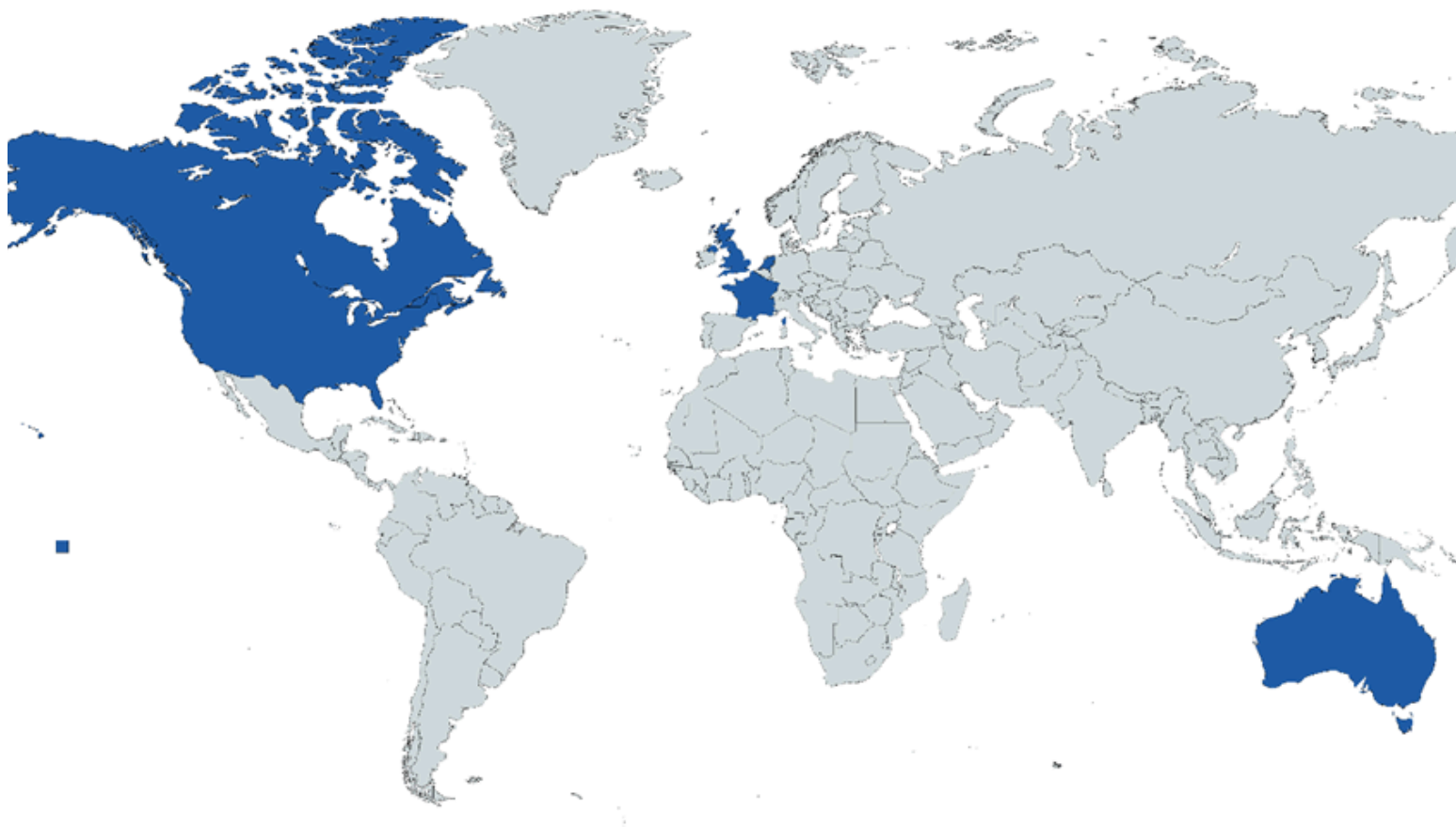
- facilitate trade within and through the port and plan for future growth and development of the port;
- undertake or arrange for activities that will encourage and facilitate the development of trade and commerce for the economic benefit of the State through the use of the port and related facilities;
- controlling business and other activities in the port or its connections within the operation of the port;
- be responsible for the safe and efficient operation of the port;
- be responsible for maintaining port property;
- be responsible for port security; and
- protect the environment of the port and minimise the impact of port operations.

Operations

The map below depicts the percentage of Pilbara Ports suppliers broken down geographically according to the country where the entity is registered for business.

In the reporting period, 99.23 per cent of contracts and current suppliers are Australian registered entities.

The table below provides the current global slavery index (GSI) prevalence and government response ratings and the percentage of suppliers engaged in the reporting period by country.



Supply chain

The prevalence rating indicates the number of people estimated to be in modern slavery per thousand people. The government response rating measures the government’s response to modern slavery based on the legal, policy, and programmatic actions that governments are taking to respond to modern slavery.

The current maximum government response rating, indicating a stronger government response to modern slavery, is 67.9.

Overwhelmingly, our suppliers and vendors are from countries whose government has implemented key components of a holistic response to modern slavery risk management with victim support services, a strong criminal justice response, evidence of coordination and collaboration and protections in place for vulnerable populations.

The main types of goods and services procured in the reporting period can be broken down into the below categories:

- Annexure A: specialised marine services.
- Annexure B: maintenance, inspection and repair services to Pilbara Ports port facilities.
- Annexure C: engineering and infrastructure works and services.
- Annexure D: information and communication technology.
- Annexure E: supply of general goods and services.
- Annexure F: valuation of properties.

The contractual arrangements we have with our suppliers vary due to the wide range of goods and services procured across the business. The main types identified are:

- Annexure G: one-off, short-term procurement activities.
- Annexure H: longer-term contracts.
- Annexure I: service provider licences.
- Annexure J: fixed-term construction agreements.
- Annexure K: consulting agreements.

GSI prevalence rating ^[8]	GSI government response rating ^[9]	Per cent (%) of suppliers engaged	Country
1.6	66.7	98.23	Australia
3.3	66.7	0.62	United States
0.6	66.7	0.35	Netherlands
1.6	53.8	0.35	New Zealand
2.1	61.5	0.18	France
1.8	67.0	0.18	United Kingdom
1.8	60.3	0.09	Canada

[8] Walk Free, Global Slavery Index (2023). GSI data measures the scale of modern slavery by indicating the prevalence of modern slavery per thousand people. Data ranges from 0.5 to 104.6. Available from: <https://www.walkfree.org/global-slavery-index> [05/09/2023]

[9] Walk Free, Global Slavery Index (2023). GSI data measures government response to modern slavery based on the legal, policy, and programmatic actions that governments are taking to respond to modern slavery. Data ranges from 67.9 to -2.6. <https://www.walkfree.org/global-slavery-index> [05/09/2023]

MODERN SLAVERY RISKS

Operations

Seafarer workforce

Seafarers are often from countries with the highest prevalence of modern slavery, which tend to be conflict-affected, have state-imposed forced labour and weak governance. While vessel crews (seafarers) are port users' responsibility, it represents one of the higher risks of modern slavery occurring in Pilbara Ports tenure^[10].

Seafarers may face increasingly isolated working conditions and often depend on their employers for communication with the outside world, which makes seafarers particularly vulnerable to exploitation^[12].

Climate change

Pilbara Ports acknowledges that the risks of modern slavery and climate change are inextricably linked. Displacement resulting from natural disasters and weather pattern changes increases the risk of people losing their homes and livelihoods.

Environmental degradation may push millions of people in our region of operations into greater inequality, driving migration and leaving people at risk of exploitation.

As part of Pilbara Ports decarbonisation pathway, the increased focus on sourcing renewable energy has recently exposed our supply chain further to the exploitation of workers.

The manufacture of components and extraction of raw materials for renewable energy products such as solar panels, wind turbines and lithium batteries have been identified as a higher risk of modern slavery^[13].

[10] The Mission to Seafarers – the very real risk of Modern Slavery in Shipping. Available from <https://www.missiontoseafarers.org/news/the-very-real-risk-of-modern-slavery-in-shipping> [10/10/2023]

[12] TLB Law & Co, Maritime transport & modern slavery – are you overlooking a key link in your supply chain? Available from:

<https://www.tlblaw.com.au/modern-slavery-in-supply-chain/> [10/10/2023]

[13] Clean Energy Council 2022. Addressing Modern Slavery in the Clean Energy Sector. Available from <https://assets.cleanenergycouncil.org.au/documents/resources/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf> [10/10/2023]



ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

The reporting period was used to progress actions to address the identified modern slavery risks in our operations and supply chains. Key achievements for the period include:

Safe vessel visits

Pilbara Ports recorded 8,480 safe vessel visits in FY2024-25. Although vessel crews and the changeover of crews are not within Pilbara Ports responsibility, as standard practice, we report on ship crew movements and requests for medical assistance across all our ports.

We continue to actively advocate for seafarers' welfare through monitoring and vetting of vessels upon arrival, provision of seafarer facilities and Internet for all vessels visiting our ports.

Bringing the internet to seafarers

Pilbara Ports has implemented a Ship Wi-Fi Support Program which transitions away from individual SIM card support and instead enables ship-wide Wi-Fi access through a Mobile Wi-Fi system. Upon each return to Port Hedland, participating vessels will receive free data top-ups, ensuring internet access reaches the entire crew. Prepaid SIM cards are continuing to be provided to crews at the Port of Dampier.

Seafarers will be able to connect with friends, family, loved ones, and the Pilbara Ports reporting network. This enables seafarers to reach out to Pilbara Ports, to report infringements, complaints or incidents of human trafficking or exploitation.

Grievance, infringement and complaints management

The 'Contact us' section on Pilbara Ports and HMI's websites ensure a working grievance mechanism to enable remediation. We are committed to working closely with the relevant authorities to assist in any alleged human rights infringement investigations, and support port users and proponents if modern slavery practices occur and assistance with the remediation process is needed.

Climate change management

Pilbara Ports continues working to determine our current climate change risks and opportunities. This includes establishing a Net Zero Transition Plan and undertaking scenario assessments to help manage climate change risks effectively and lay a foundation for a long-term transition to net zero by 2050.

We continue to align our approach to climate change with core business planning.

Recruitment and employment

Employment, industrial relations, work health and safety laws in Australia continue to be complied with at Pilbara Ports.

Appropriate policies, systems and procedures for engaging recruitment agencies and employing people are in place, ensuring that people are recruited honestly, and their work conditions are appropriate as well as their hours and pay.

Training

Modern slavery training continues to be implemented across the organisation to create awareness and an understanding of our activities that could be linked to human rights violations. To ensure ongoing training, a Modern Slavery Training Module has been included in our minimum training requirements managed through our business-wide Learning Management System (LMS).

All employees must complete the training within 12 months of role commencement with refresher training every two years. To date, 148 people have undertaken modern slavery training in the last two years.

Procurement and tendering systems

We continued the process to improve our procurement and tendering systems by implementing additional controls for goods and services purchased from high-risk categories and countries/jurisdictions through our supply chains. The Vendor Management System (VMS) continues to mature to improve governance around the engagement and monitoring of vendors.


Risk assessment of the supply chain

During the reporting period, we commenced the process to assess the risk of modern slavery more effectively in our tier 1 supply chain and beyond. The risk assessment will consider the geographic location, type of product or service procured, and industry risks. It will be aligned to international best practices, with the information collated available to undertake deeper dive assessments of higher-risk suppliers.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Pilbara Ports continues to set and track key performance indicators as part of our governance, including due diligence, compliance and risk management to measure effectiveness.

The Governance Risk and Compliance (GRC) system supports establishing the context, identifying, analysing, evaluating, treating, monitoring and communicating risks associated with our business activities to reduce the likelihood of negative impacts and to maximise opportunities.



Samuel McSkimming
CHIEF EXECUTIVE OFFICER
5 December 2025

CONSULTATION PROCESS

During the reporting period, the modern slavery working group, comprising members from Pilbara Ports Finance and Governance, Customer and Strategy and HMI teams, met to discuss and agree on actions to be taken to assess and address the risk of modern slavery practices notably establishment of the Ethixbase platform to support assessment of the modern slavery risk for Pilbara Ports vendors.

HMI has been actively contributing to the development of this statement to ensure that any decisions made, or actions taken are relevant for Pilbara Ports and HMI. This statement was endorsed by the HMI Managing Director.

OTHER INFORMATION

Nil.



Karlie Mucjanko
CHAIR
5 December 2025

MODERN SLAVERY ACT 2018 (CTH) STATEMENT ANNEXURE

Principal governing body approval

This modern slavery statement was approved by the principal governing body of Pilbara Ports as defined by the *Modern Slavery Act 2018 (Cth)*^[1] on 5 December 2025.

Signature of responsible member

This modern slavery statement is signed by a responsible member of Pilbara Ports as defined by the Act^[2].

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	6-14
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	12-14
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	13-14
e) Describe how the reporting entity assesses the effectiveness of these actions.	14
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	14
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	N/A

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

¹ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

² Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

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PILBARA PORTS AUTHORITY ABN 94 987 448 870

HEDLAND MARITIME INITIATIVE PTY LTD ABN 70 645 630 468

