Abbot Point Operations

Modern Slavery Statement 2026

In accordance with the *Modern Slavery Act 2018* (Cth)

On behalf of:

Abbot Point Operations Pty Ltd
ACN: 605 852 060
ABN: 58 605 852 060

and

Abbot Point Bulkcoal Pty Ltd
ACN: 010 183 534
ABN: 23 010 183 534

Reporting period – 1 April 2025 – 31 March 2026

Table of Contents

1 Introduction 3
2 Modern Slavery Law 3
3 Mandatory Criteria One: Identify the reporting entity 3
4 Mandatory Criteria Two: Describe its structure, operations and supply chains 4
4.1 Structure 4
4.2 Operations 4
4.3 Supply Chains 5
5 Mandatory Criterion Three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls 6
5.1 High Risk Sectors 6
5.2 Outsourced Services 6
5.3 Labour-Intensive Workforce 6
5.4 Geographical Sourcing 7
6 Mandatory Criterion Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation process 7
6.1 Policies and Procedures 7
6.2 Governance and Oversight 7
6.3 Supplier Due Diligence 7
6.4 Contractual Controls 8
6.5 HR Practices, Training and Awareness 8
6.6 Grievances and Reporting 8
6.7 Ongoing Supplier Monitoring 8
7 Mandatory Criterion Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks 8
8 Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls 8
9 Mandatory Criterion Seven: Any other relevant information 8
10 Joint Reporting Entities Principal Governing Body Approval 9
11 Reporting Entities Signature of a Responsible Member 9

1 Introduction

This Modern Slavery Statement is made in accordance with section 14 of the Australian *Modern Slavery Act 2018 (Cth)* (the **Act**) and describes the actions taken by Abbot Point Operations Pty Ltd and Abbot Point Bulkcoal Pty Ltd during the reporting period 1 April 2025 to 31 March 2026 to assess and address modern slavery risks in the APO Group's operations and supply chains.

This Modern Slavery Statement is a joint statement, made on behalf of Abbot Point Operations Pty Ltd ABN 58 605 852 060 (**APO**) and Abbot Point Bulkcoal Pty. Ltd. ABN 23 010 183 534 (**APB**) (together, **APO Group**). A reporting entity under the Act is determined based on whether it is operating in Australia with annual consolidated revenue of at least $100 million in the reporting period. For the purposes of this Statement, references to "APO Group", "We", "Us", and 'Our' collectively refer to APO Group and each of its reporting entities covered by the Statement.

During the reporting period, APO Group continued to strengthen its approach to modern slavery risk management by maintaining supplier due diligence processes, continuing modern slavery awareness and training activities, reviewing higher-risk supplier categories, engaging with suppliers identified as presenting higher inherent risk, and monitoring the effectiveness of existing governance, procurement and reporting controls.

APO Group remains committed to the highest levels of ethical business practices and is devoted to understanding and combating the risk of modern slavery in our supply chains and in any part of our business.

This statement was approved by the boards of each of the two reporting entities covered by this statement on 28 September 2026.

2 Modern Slavery Law

The Act identifies seven relevant mandatory criteria which APO Group's Statement must address, as follows:

a) identify the reporting entity;

b) describe the reporting entity's structure, operations, and supply chains;

c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls;

d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes;

e) describe how the reporting entity assesses the effectiveness of these actions;

f) describe the process of consultation with any entities that the reporting entity owns or controls; and

g) any other information the reporting entity considers relevant.

For the purposes of the Act, modern slavery includes conduct that would constitute slavery, servitude, forced labour, forced marriage, debt bondage, trafficking in persons, deceptive recruiting for labour or services, and the worst forms of child labour. APO Group recognises that modern slavery risks may occur not only in direct employment arrangements, but also through contractor workforces, labour hire arrangements, outsourced services and the deeper tiers of supply chains.

3 Mandatory Criteria One: Identify the reporting entity

This is the joint modern slavery statement for the APO Group which is comprised of the following Australian registered companies:

1. Abbot Point Operations Pty Ltd (APO)

ACN: 605 852 060 / ABN: 58 605 852 060

APO is an Australian proprietary company, registered in Queensland in 2015.

Registered Office: Adani Renewable Asset Holdings Pty Ltd, Level 9, 120 Edward Street Brisbane QLD 4000.

Principal Place of Business: Abbot Point Road, Bowen.

The ultimate holding company is Adani Ports and Special Economic Zone Ltd.

100% of the shares in APO are held by Adani Ports and Special Economic Zone Ltd.

And

2. Abbot Point Bulkcoal Pty Ltd (APB)

ACN: 010 183 534 / ABN 23 010 183 534

APB is an Australian proprietary company that was registered in Queensland in 1980.

Registered Office: Adani Renewable Asset Holdings Pty Ltd, Level 9, 120 Edward Street Brisbane QLD 4000.

Principal Place of Business: Abbot Point Road, Bowen.

The ultimate holding company is Adani Ports and Special Economic Zone Ltd.

100% of the shares in APB are held by Abbot Point Operations Pty Ltd.

APO and APB are reporting entities under the Act. This is the joint statement for the APO Group.

4 Mandatory Criteria Two: Describe its structure, operations and supply chains

4.1 Structure

APO is an Australian Proprietary Company that was established in 2015 and is based in Brisbane, Queensland. Adani Ports and Special Economic Zone Ltd is the ultimate holding company of APO. APO is controlled by Adani Ports and Special Economic Zone Ltd. APO owns and controls APB.

APB is an Australian Proprietary Company that was established in 1980 and is based in Bowen, Queensland. Adani Ports and Special Economic Zone Limited is the ultimate holding company of APB. APB is 100% owned and controlled by APO.

APB operates as Abbot Point Operations:

Abbot Point Operations

4.2 Operations

North Queensland Export Terminal (the **Terminal**) is a dedicated deep-water coal export terminal with a nameplate capacity of 50 million tonnes per annum.

The Terminal was constructed as a dedicated deep-water coal export terminal by the Queensland Government and commissioned in 1984. The Terminal is owned by the Queensland Government's North Queensland Bulk Ports and leased by North Queensland Export Terminal Pty Ltd (NQXT) under a 99-year leasehold arrangement acquired in June 2011. NQXT has contracted Abbot Point Operations to manage the operations of the Terminal.

The Terminal is located in the Port of Abbot Point, approximately 25 km north of Bowen, in North Queensland on Australia's east coast. The Port of Abbot Point includes Australia's northernmost resource terminal and is one of only three major resource ports located within 200 km of the Bowen Basin, which is one of Australia's major resource provinces.

The Terminal is a dedicated coal export terminal comprising a dual rail in-loading facility, coal handling and stockpiling areas comprising three bunds capable of being serviced by six stacker reclaimers and a 2.8-kilometre trestle jetty and conveyors connecting to two offshore berths and two ship-loaders.

APO has been contracted by NQXT to manage the operations at the Terminal (Operations and Maintenance Contract). Pursuant to a sub-contract between APO and APB (Operations and Maintenance Subcontract), APB performs the operations and maintenance services at the Terminal.

Whilst APO derives revenue through the sub-contract with APB, it does not perform any operational role nor engage any third-party contractors. This is exclusively provided by APB. Whilst this Statement is made as a joint Statement because of the combined revenue of both entities, all modern slavery risks and controls are contained within APB. The identification and management of modern slavery supply chain risk have, therefore, been focused on the activities and supply chain of APB as APO does not perform any relevant activities nor have an independent supply chain from APB.

APO Group's operations include:

- **Processing and delivery of product or services.** The APO Group unloads coal from the dual rail in-loading facility and transports the coal to the three stockpiling bunds located at the Terminal. The coal is then collected by one of the six stacker reclaimers and transported along a 2.8-kilometre trestle jetty and conveyor to one of the two offshore berths, where it is loaded onto awaiting coal vessels by one of the two ship-loaders. The whole processing and delivery of product, being operations for which the APO Group is responsible, occurs at the Port of Abbot Point, Bowen, North Queensland, Australia.
- **Direct employment of workers.** During this reporting period, APO did not have any employees, while APB employed 198 employees based at the Terminal. Employees are employed under individual employment contracts or an enterprise agreement which has been approved through Fair Work Australia processes. Our employees fulfill the role of management, office support staff, production and maintenance personnel.
- **Construction.** The APO Group is responsible for the ongoing maintenance of the Terminal. This includes ongoing improvement works and replacement of assets as they near end of life. These works are primarily performed by our specialised contractors and managed by our direct employees.
- **Charitable activities.** The APO Group donates to the local community through its Community Support Programs. The Program includes ongoing sponsorship in the local community, donations, club sponsorships, events and community memberships.

Our website (https://www.abbotpointoperations.com.au) provides more detailed information about our business, including our strategy, philosophy, and operations, as well as our approach to sustainability.

4.3 Supply Chains

APO Group's supply chain consists of businesses that provide goods and services required to support the operation and maintenance of the Terminal. To support our operations, we engage with specialised suppliers to maintain the Terminal assets.

APO Group's supply chain includes suppliers providing maintenance, construction, labour hire, engineering, technical, cleaning, security, transport, energy, utilities, information technology, insurance, plant and equipment, spare parts, conveyor components, personal protective equipment and other operational goods and services. These suppliers operate across a broad range of sectors including construction, manufacturing, mining, transportation and storage, wholesale and retail trade, professional and scientific services, labour hire, accommodation and food services, agriculture, utilities, waste management, information and communication technology, finance and insurance, education, and health services.

During the reporting period, a vast majority of APO Group's direct suppliers are Australian entities. A small minority relates to overseas suppliers or suppliers with upstream supply chains connected to overseas jurisdictions. Our suppliers operate in many locations across the world, including Canada, Germany, Indonesia, Mexico, New Zealand, Philippines, Singapore and United States of America. APO Group recognises that, although its direct supplier base is predominantly Australian, modern slavery risks may still exist in lower tiers of the supply chain, particularly where raw materials, manufactured components, fabrics, rubber, steel or labour-intensive services are sourced from overseas.

APO Group's key supplier spend categories during the reporting period were:

- Fuel, energy, utilities and lease – 14.2%
- Insurances – 17.5%
- IT services – 5%
- Contract services – 39.8%
- Goods supply – 0.5%
- Goods & Services – 23%

5 Mandatory Criterion Three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

APO Group assesses modern slavery risk by considering the likelihood that it may cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. In assessing risk, APO Group considers a range of factors, including:

- the nature of the goods or services supplied;
- the extent to which the supplier relies on labour hire, subcontractors, migrant workers or lower-skilled labour;
- the geographic location of the supplier and any known upstream sourcing countries;
- the modern slavery risk profile of the relevant industry or commodity;
- the value and criticality of the supplier relationship;
- supplier responses to modern slavery due diligence questionnaires;
- whether modern slavery clauses are included in the relevant contract or purchase order terms; and
- any grievances, reports, audit findings, adverse media or other information that may indicate modern slavery risk.

This risk-based approach assists APO Group to prioritise supplier engagement and due diligence activities for higher-risk categories.

Whilst APO Group strives to ensure there is minimum risk of modern slavery in its Operations and Supply Chain, APO Group acknowledges that there is a potential for the APO Group to cause, contribute to, or be directly linked to modern slavery.

5.1 High Risk Sectors

Our suppliers operate, produce, and source across several different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in *Child Labour: Global Estimates 2020 Trends and the Road Forward* (ILO and UNICEF, 2021).

Some of our suppliers operate, produce goods or source goods and services in high-risk sectors such as accommodation and food service activities, building services, labour hire, manufacturing, personal services, transportation and storage, agriculture, forestry and fishing, construction, maintenance and repair of motor vehicles, mining and quarrying, retail and wholesale.

During the reporting period, APO Group identified PPE as a supplier category requiring targeted review due to the labour-intensive nature of PPE manufacturing and the potential for complex upstream supply chains. This was particularly relevant to gloves, locks and other PPE products that may involve overseas manufacturing, rubber (i.e. gloves) or fabric inputs (i.e. embellished textiles, footwear), subcontracted production arrangements and lower-tier suppliers that are not directly visible to APO Group.

5.2 Outsourced Services

We acknowledge that within our operations there are areas of vulnerability which include outsourced services such as cleaning, security, maintenance and construction services, and the use of labour hire contractors.

5.3 Labour-Intensive Workforce

APO Group continues to recognise that certain labour-intensive services, including cleaning, painting, scaffolding and boiler making, may present an elevated risk of modern slavery due to factors such as reliance on migrant labour, language barriers and lower entry-to-work requirements. APO Group has focused on continuously improving its risk management approach through supplier engagement, workforce education, mandatory training, enforcement of its Code of Business Conduct, and ongoing monitoring of worker welfare, safety, personal protective equipment and fatigue management practices.

5.4 Geographical Sourcing

The risk of modern slavery may be heightened in some of APO Group's supply chains because of the geographical sourcing of materials used in products supplied to us. Materials such as rubber, steel and fabrics sourced from Southeast Asia carry a high risk of modern slavery practices such as the use of slave labour and non-award payment of wages.

There is also a modern slavery risk associated with the sourcing from China of products supplied to us such as electronics, footwear, gloves and lithium-ion batteries.

Our rubber belts continue to be supplied through a single business, with operations in Australia. However, raw materials used to manufacture the conveyor belt compounds do come from overseas suppliers, with natural rubber being sourced from Malaysia and other major raw materials sourced from countries including Asia.

While APO Group has not directly caused any Modern Slavery risks, the risk of modern slavery will continue to remain in areas where materials and labour are sourced from developing nations within the APO Group's supply chain. These risks may not be apparent through our first-tier engagements but may be hidden within their own supply chain.

6 Mandatory Criterion Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation process

6.1 Policies and Procedures

During the reporting period, APO Group continued to maintain and implement policies and procedures designed to identify, assess and address modern slavery risks within its operations and supply chains. These include:

- **Modern Slavery Work Instruction,** which provides guidance to employees on the identification, assessment, escalation and management of modern slavery risks, including supplier due diligence requirements and reporting obligations;
- **Whistleblower Policy**, which provides employees, contractors, suppliers and other stakeholders with mechanisms to confidentially report concerns regarding suspected unlawful, unethical or inappropriate conduct, including potential modern slavery practices;
- **Code of Conduct,** which sets expectations regarding ethical business practices, lawful conduct and respect for human rights.

6.2 Governance and Oversight

APO Group's approach to modern slavery risk is supported by governance processes that involve relevant business functions, including procurement, contracts, human resources, operations, and health and safety. Representatives from these departments form the members of the Modern Slavery Committee. This Committee provides a forum to review modern slavery risks, monitor supplier due diligence activities, consider training and awareness initiatives, and identify opportunities for continuous improvement within its operations and supply chains.

6.3 Supplier Due Diligence

During the reporting period, APO Group continued to screen new suppliers and engage with current suppliers in targeted categories, including PPE. A key enhancement during the reporting period was the introduction of iPro, a new supplier due diligence software platform used to issue modern slavery questionnaires, record supplier responses and support a more structured review of supplier modern slavery risk information. Supplier due diligence activities included issuance of these questionnaires, conduct of the review of supplier responses, consideration of the nature and location of goods and services supplied, and further engagement with suppliers where additional clarification was required.

The use of iPro software strengthened APO Group's supplier due diligence process by enabling, more comprehensive questions, capturing more detailed supplier information, and generating reports to support a deeper assessment of each details, giving a better understanding of supplier's modern slavery risk profile compared to previous years. APO reviewed the iPro-generated report and the supplier responses to better understand each supplier's modern slavery risk management arrangements, including supply chain visibility, sourcing practices, subcontractor controls, labour standards, policies and procedures, and grievance and remediation processes.

The responses received from PPE suppliers provided valuable insight into the structure and practices of their supply chains. Overall, the responses demonstrated a generally strong level of awareness of modern slavery risks and the implementation of controls designed to identify, prevent and address such risks throughout supplier operations and supply chains.

6.4 Contractual Controls

APO Group continued to use contractual terms and procurement processes to support modern slavery risk management. Where appropriate, supplier contracts and purchase order terms include obligations relating to compliance with applicable laws, ethical business conduct, modern slavery, workplace health and safety, subcontractor management, and cooperation with information requests, audits or investigations.

6.5 HR Practices, Training and Awareness

APO Group maintained modern slavery training and awareness activities during the reporting period. These activities were intended to assist relevant employees to identify modern slavery risk indicators, understand reporting pathways, and consider modern slavery risk as part of procurement, supplier onboarding and contract management processes.

6.6 Grievances and Reporting

APO Group continues to provide ongoing assistance and support for victims of modern slavery through our Employee Assistance Program (available to our staff and contractors).

6.7 Ongoing Supplier Monitoring

APO Group conducts periodic reviews of publicly available information relating to modern slavery risks across its supplier base. This includes monitoring relevant media reports, the Australian Border Force Prohibited Employer Register, and the AFP News Centre for modern slavery, trafficking and labour exploitation matters. Where potential concerns are identified, APO Group may undertake further enquiries and due diligence to assess and address any associated risks.

During the reporting period, APO Group identified publicly available media reports concerning allegations of modern slavery practices involving a glove manufacturer. In response, APO Group reviewed its supplier list and engaged with relevant suppliers to determine whether the manufacturer formed part of its supply chain. This review included consideration of downstream suppliers and seeking alternative glove manufacturers within APO Group's operations. APO discontinued making purchases of this product.

7 Mandatory Criterion Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

APO Group assesses the effectiveness of its actions through a combination of governance review, supplier due diligence outcomes, training participation, contract controls and grievance reporting. During the reporting period, APO Group monitored key performance areas such as (1) Governance and oversight; (2) Contract Controls; (3) Supplier Due Diligence; (4) HR practices, training and awareness and (5) Grievances and Reporting.

Measures reviewed included Modern Slavery Committee meetings held, modern slavery obligations contained in new contracts and purchase orders, completion rates of modern slavery training and suppliers completing the modern slavery questionnaires.

APO Group will continue to review these measures and improve the quality of data collected to assess the effectiveness of its modern slavery risk management activities.

8 Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls

This Statement has been prepared in consultation with the reporting entities covered by the Statement and entities that we own or control.

9 Mandatory Criterion Seven: Any other relevant information

No further information included in this section.

10 Joint Reporting Entities Principal Governing Body Approval

This Statement was approved and signed by the principal governing body of the reporting entities, Abbot Point Operations Pty Ltd and Abbot Point Bulkcoal Pty Ltd, as defined by the Modern Slavery Act 2018 (Cth) (the Act), on 28 September 2026.

11 Reporting Entities Signature of a Responsible Member

This Modern Slavery Statement is signed by a responsible member of each reporting entity, as defined by the Act.

On behalf of Abbot Point Operations Pty Ltd



Paul Fennelly

Director

28 September 2026