Modern Slavery Statement 2025

PORT WARATAH
COAL SERVICES

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REVISION HISTORY

Date	Review	Definition
04/02/2026	1	First draft
	2	Issued to Audit and Risk Committee for endorsement
	3	Issued to Board for approval

PORT WARATAH
COAL SERVICES

Modern Slavery Policy Statement

Port Waratah believes that ensuring there is no slavery, servitude or debt bondage in our organisation, or its supply chains, is core to maintaining its social licence to operate. Port Waratah will demonstrate this commitment by striving to continuously improve our identification, assessment and management of modern slavery risk and operate within a sustainable and responsible supply chain.

Port Waratah is committed to:

- Our values and our 5 Drivers for Success, which includes the Licence to Operate (LTO) framework.
- Providing the leadership, training and coaching required to ensure elimination of forced labour, child labour, debt bondage, minimum wages abuse, immigration rule breaches or other deprivations of civil liberties including human trafficking or forced marriage from our operations and global supply chain.
- Protecting the rights of all stakeholders and the global community from which Port Waratah sources materials and services in accordance with the United Nations Guiding Principles on Business and Human Rights.
- Establishing modern slavery objectives, targets and improvement programs which will drive continual improvement in outcomes and meet or exceed the minimum standards in the *Modern Slavery Act 2018 (Cth)*.
- Identifying, assessing and managing modern slavery risks that may arise early in the purchasing and tender evaluation processes, prior to contract award and periodic reassessment.
- Managing our operations in compliance with all applicable laws, regulations and statutory requirements.
- Reporting on and publishing our performance on an annual basis.
- Contributing to the achievement of the United Nation's Sustainable Development Goals, in alignment with the priorities of our business strategy, and using the Global Reporting Initiative Standards as a guidance tool.
- Engaging in a meaningful way, encouraging and supporting our people, contractors, suppliers and other stakeholders to participate in programmes to improve outcomes.

Port Waratah expects ***EVERYONE*** – employees, contractors, suppliers and other stakeholders to take personal responsibility to comply with this Policy, hold each other to account, and report any areas of concern in accordance with our Whistleblower Policy.

Hennie du Plooy
CHIEF EXECUTIVE OFFICER

2 EXECUTIVE SUMMARY

In 2025, we reaffirmed our commitment to ensuring that our business and supply chains are free from modern slavery. Every person has the right to work in a safe and ethical environment, free from exploitation and abuse. Our commitment is embedded in our policies, our corporate values and our Work to Live principles, ensuring fair and ethical treatment for all individuals involved in our supply chain.

This statement is supported by our values of integrity, caring, progress and excellence. Our values contribute to ensuring we are not only a sustainable business, but a business that all our stakeholders are proud to be associated with. This statement is also supported by our Work to Live program. This program underpins our culture and our commitment to the principles of this program is key to unlocking great outcomes for everyone.

Through collaboration with our supply chain partners, we strive to create a workplace and business environment that fosters dignity, equality, and freedom. Together, we stand against modern slavery, championing a future where every person's rights are respected and protected.

This statement was approved by the Board of Port Waratah Coal Services Limited, as the principal governing body, on 24 March 2026. The Board has approved for statement to be signed by Stefanie Loader, Chairperson, and Hennie du Plooy, CEO.

STEFANIE LOADER
Chairperson

HENNIE DU PLOOY
Chief Executive Officer

3 INTRODUCTION

3.1 BACKGROUND

This Modern Slavery Statement has been prepared by Port Waratah to meet the requirements of the Australian Modern Slavery Act 2018 (the Act) for the financial year ending 31 December 2025. There has been no change to the Act in the period since the 2024 Statement was prepared.

Modern slavery has long-lasting impacts on affected individuals and communities. The most recent United Nations (UN) information continues to estimate that there are at least 50 million victims of modern slavery worldwide.

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), Port Waratah respects all internationally recognised human rights as set out in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

In addition, the UN Guiding Principles on Business and Human Rights outline that businesses have a responsibility to respect human rights, which includes acting to prevent, mitigate and, where appropriate, remedy modern slavery within business operations and corporate supply chains.

3.2 MODERN SLAVERY DEFINITION

Modern slavery is the act of depriving another person of their liberty by exploiting them for commercial gain. Modern slavery can be either state-sponsored, or employer controlled. In some instances, intermediaries such as employment agencies, brokers, or even criminal gangs are involved.

3.3 OUR OBJECTIVE

Port Waratah believes that taking all reasonable steps to ensure there is no slavery, servitude or debt bondage in our business and supply chains is core to maintaining our social licence to operate. Port Waratah believes all employees, contractors, suppliers, customers and other stakeholders have an equal responsibility to make all reasonable enquiries and take all reasonable steps to prevent modern slavery.

Port Waratah strives to continuously improve our identification, assessment and management of modern slavery risk and operate within a sustainable and responsible supply chain.

In addition to our values and Work to Live principles, Port Waratah's Modern Slavery Policy is also underpinned by our Code of Conduct and Whistleblower Policy.

3.4 REPORTING OBLIGATIONS

The reporting period for this statement is 1 January to 31 December 2025.

The Act identifies seven mandatory criteria which each annual modern slavery statement must address:

1. Identify the reporting entity (section 4.1).
2. Describe the reporting entity's structure, operations, and supply chains (section 4.2).
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity (section 5).
4. Describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes (section 6).
5. Describe how the reporting entity assesses the effectiveness of these actions (section 7).
6. Any other information the reporting entity considers relevant (Section 8).

The remaining criteria pertain to consultation with entities owned by Port Waratah and entities that Port Waratah delivers a joint modern slavery statement. Neither of these requirements are relevant in 2025 to Port Waratah.

4 OUR BUSINESS

4.1 REPORTING ENTITY

Port Waratah Coal Services Limited (ABN 99 001 363 828, Port Waratah) is an unlisted public company. There are no active subsidiaries or other members of the reporting entity.

4.2 STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Port Waratah delivers high-quality, reliable and flexible services to our customers in the Hunter Valley Coal Chain. We own and manage the Kooragang and Carrington Coal Terminals, and have been receiving, stockpiling, blending and loading coal for export at the Port of Newcastle for over 40 years. In 2025, we loaded 96.8 million tonnes of coal destined for 14 countries. Japan, China and Taiwan made up 88% of coal exported, across our Carrington and Kooragang Terminals.

We have approximately 333 employees (excluding apprentices) working across our business, operating our terminals 24 hours per day, 7 days a week. Our operations are supported by skilled contractors providing labour, materials and services. We make payments of over $150 million per annum to more than 400 contracting companies and suppliers, with the largest spend categories being professional engineering services, maintenance, repairs and operational support.

We support the local economy by employing and procuring services locally where possible and collaborating with suppliers to build long-term partnerships that deliver both for our customers and our stakeholders. Port Waratah continues to work directly with contractors to better understand the risks within their supply chain, especially where contractors are sourcing from overseas suppliers and where we have a limited visibility of the procurement process.

Our Supplier Strategy 2023 - 2028 recognises the importance of an environmentally and socially sustainable supply chain. When procuring goods and services from suppliers we consider social and environmental impacts of these decisions with a focus on maintaining safety and quality standards, protecting the environment and human health, saving energy, minimising waste, conserving resources and complying with the Modern Slavery Act. Port Waratah seeks to proactively mitigate modern slavery risks through the purchasing, tender evaluation and contract review processes.

All potential moderate to high-risk suppliers are requested to provide a copy of their own annual Modern Slavery Statement or otherwise undertake Port Waratah's Self-Assessment Questionnaire (SAQ).

All contractors and suppliers are expected to abide by our Modern Slavery Policy Statement, Code of Conduct and our Whistleblower Policy which are available on our website.

Visit our website for more information about us and what we do.

5 OUR RISKS OF MODERN SLAVERY

We understand that modern slavery risks are increased when employing migrant workers and/or sourcing from sectors with high levels of subcontracting. We are cognisant of the general risks associated with migrant workers and subcontracting arrangements and have oversight in place to address direct risks in our operations. Accordingly, we do not consider that we are likely to cause or contribute to modern slavery directly within our own operations.

Our direct materials supply sources are predominantly domestically based. We understand that modern slavery risks are increased when our suppliers and contractors source materials from deep or complex international supply chains. Typically, these supply chains have low corporate visibility, and we recognise that low visibility often means higher risk in materials and services such as:

- Equipment and tools.
- Base materials (including imported steel, rubber, and ceramics).
- Bulk materials (including fuels, oils, lubricants, grease, acids, anticorrosives, chemicals).
- Extruded plastics (including PVC).
- Electronics, batteries, cells, and processing units.
- Electrical components and cables.
- Technology hardware.
- Conveyor belting and parts.
- Tyres.
- High wear ceramics.
- Consumables.
- Personal protective equipment (including gloves).
- Uniforms.
- Office supplies; and
- IT software maintenance and support

The identified higher risk service providers due to their reliance on lower paid and or less stable employment arrangements are as listed. Port Waratah engages an international company to assess and audit these providers prior to engagement at Port Waratah.

- Freight and logistics.
- Cleaning.
- Security.
- Construction.

The risks associated with international coal supply chain participants are acknowledged, but outside Port Waratah's direct sphere of influence, refer to Section 8 titled "Other Relevant Considerations".

6 ACTIONS

6.1 ACTIONS IN 2025

In 2025, we continued to take steps to identify and mitigate the risk of modern slavery in our operations and supply chains. We conducted due diligence on our suppliers and actively sought to ensure that they comply with our standards. Port Waratah also continued to train our employees through inclusion of modern slavery risks in our induction package to raise awareness of modern slavery and how to identify and report it.

Port Waratah recognise that modern slavery is a complex issue that requires a collaborative effort to eradicate. We are committed to working with our suppliers, customers, and other stakeholders to promote ethical practices and protect human rights.

Port Waratah continues to monitor and review our policies and procedures to ensure that we are doing everything practical and feasible to prevent modern slavery. We will also report on our progress in our next annual modern slavery statement.

In the 2024 Statement Port Waratah committed to the following actions:

Planned Action	Progress	Outcome
Continue our risk based due diligence program on higher risk suppliers.	Completed	Continuation of program in 2026
A refresh of relevant policies and procedures in line with any better practice guidance from the Anti-Slavery Commissioner.	No updated guidance was provided in the period by the Commissioner.	Continued monitoring for updated guidance.
Improved alignment of the Corporate Risk Register to reflect the mitigation of modern slavery risks relating to significant projects.	Completed	Risk register updated
Develop baseline metrics based on nature and origin of supply to report and assess movements in Modern Slavery risks over time. This will be facilitated through the implementation of upgraded contractor management software in Q1 2025.	Baseline data indicated that Port Waratah is well advanced in assessing potential modern slavery risks across its contractor workforce;	Baseline position established; comparative analysis to be progressed once suitable system functionality is available.

6.2 2026 PLANNED ACTIONS

The planned program for 2026 is:

- Continue our risk based due diligence program on higher risk suppliers.
- A refresh of relevant policies and procedures in line with any better practice guidance from the Anti-Slavery Commissioner.
- Continued participation on the Port Welfare Committee in Newcastle in collaboration with others to address seafarer welfare issues and advocate for the needs of seafarers in the region
- Monitor baseline metrics from Contractor Assessments to assess movements in Modern Slavery risks over time. This will be facilitated through the contractor management software data reporting.

6.3 COMPLAINTS, DISCLOSURES

We continue to utilise our existing complaints and grievance mechanisms to address modern slavery concerns where our standards may not have been met. For more information refer to our Whistleblower Policy.

No complaints regarding modern slavery risk management were received during 2025.

6.4 REMEDIATION

No incidents of modern slavery in breach of our policies were noted during 2025.

In instances of non-conformance, Port Waratah will utilise its Supplier Non-Conformance and Corrective Action Procedure, providing a detailed process for handling cases of non-conformance to Port Waratah standards. The processes for non-conformance identification, communication, supplier feedback and outcome review are embedded in this procedure. All non-conformance actions and responses are recorded.

Port Waratah would only seek alternative supply sources if it were unable to establish a collaborative supplier relationship focused on continuous improvement. No suppliers have been terminated to date due to modern slavery risks.

7 OUR ASSESSMENT OF EFFECTIVENESS

To evaluate the effectiveness of our actions we continue to monitor potential moderate to high-risk suppliers own annual Modern Slavery Statements or otherwise Port Waratah's Self-Assessment Questionnaire (SAQ).

Port Waratah's approach continues to mature and evolve over time. We continue to learn from our industry peers, external experts and third-party benchmarks to build and strengthen our approach.

8 OTHER RELEVANT CONSIDERATIONS

Port Waratah recognises that modern slavery risks exist within other parts of the Hunter Valley Coal Chain, in particular, the vessels that load and transport coal, under contracts with customers or third parties, from our terminals to global export destinations.

Seaborne freight has been identified in reports produced by governments and NGOs as a sector with a higher risk of modern slavery because it employs lower-paid workers from developing countries, involves long periods at sea with little regulatory oversight, and often subjects crew to difficult working conditions.

Vessels that call at loading ports in Australia are under the jurisdiction of the Australian Maritime Safety Authority (AMSA). The Maritime Labour Convention 2006 requires vessels to have on-board procedures for seafarers to lodge complaints, including an internal reporting mechanism and the right to complain to external authorities. AMSA is empowered to take steps to verify grievances, including detaining and inspecting vessels and can take regulatory action to protect the safety and wellbeing of seafarers. AMSA has demonstrated an ability to respond effectively and quickly to seafarers' grievances.

Port Waratah continues to focus on vessel vetting utilising RightShip on all vessels proposed for entry to the Port. RightShip is a leading maritime risk management tool providing assurance that all vessels and ship managers are compliant with the ILO Maritime Labour Convention, 2006. If a vessel requests assistance from us, we provide support wherever practical and feasible.

Port Waratah works closely with appropriate authorities (including AMSA, International Transport Federation, shipping agents, NSW Police, Australian Border Force, Port Authority NSW and Port of Newcastle) to enable humanitarian assistance to be provided to seafarers where required.

Port Waratah continues to support community organisations such as Mission to Seafarers and remains a leading member of the Port Welfare Committee in Newcastle, focused on seafarer's wellbeing and provide access to our sites for these organisations to connect with visiting seafarers to provide a range of services. Port Waratah also provides access to high-speed communications via free WIFI when vessels are at our berths for seafarers to access, which has been recognised as an industry leading initiative for seafarer welfare.

PORT WARATAH
COAL SERVICES

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