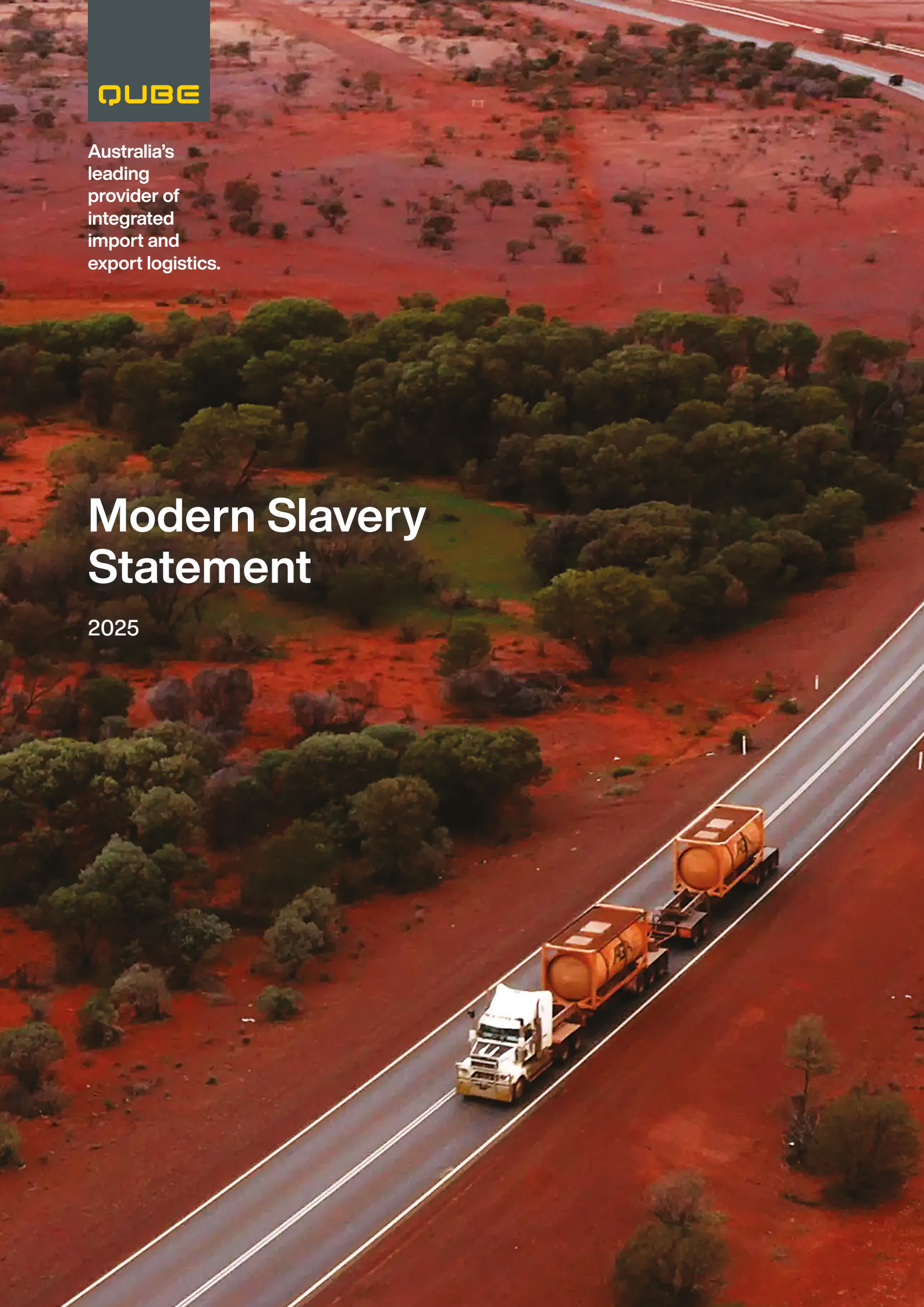




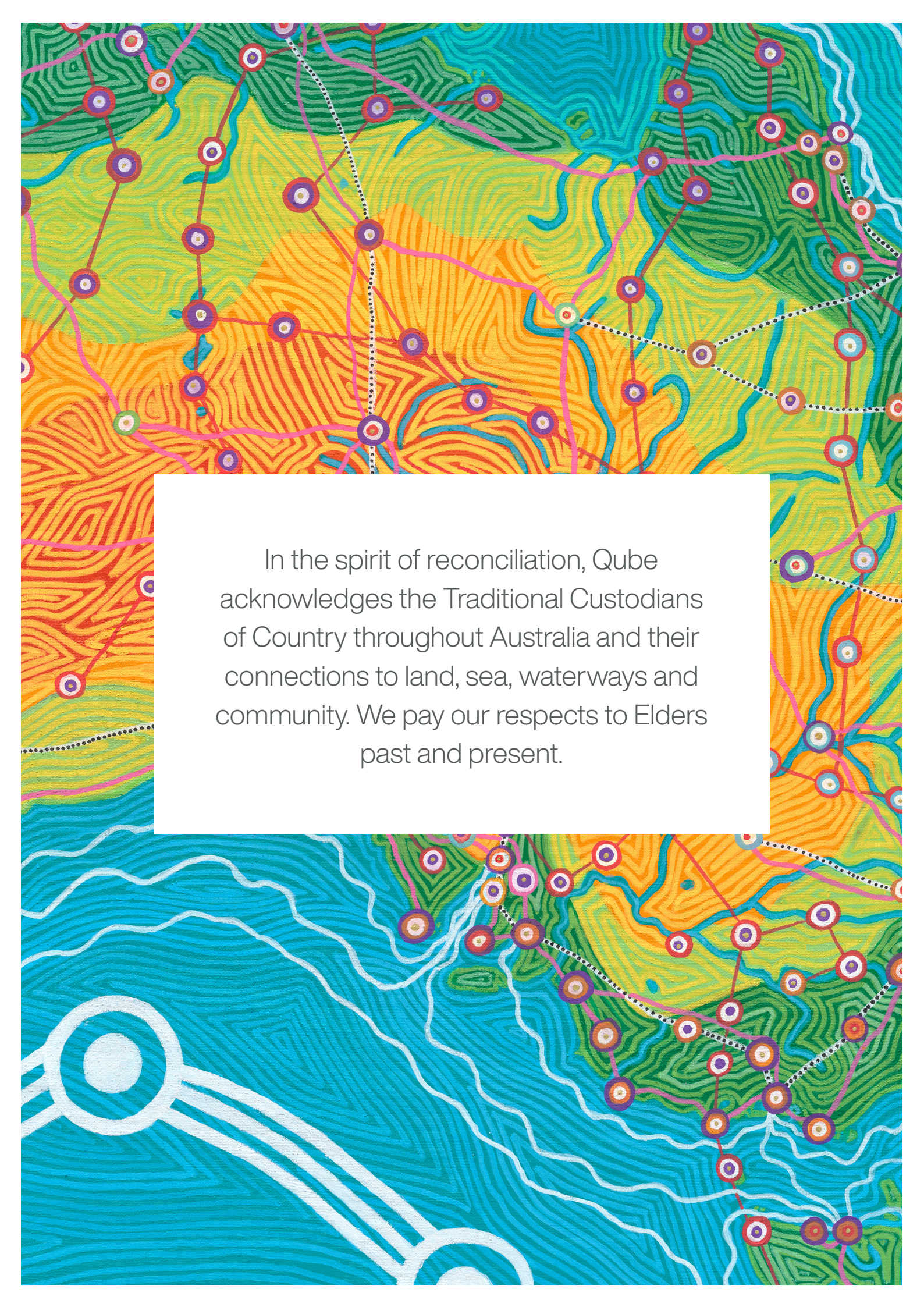
Australia's  
leading  
provider of  
integrated  
import and  
export logistics.

# Modern Slavery Statement

2025







In the spirit of reconciliation, Qube acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea, waterways and community. We pay our respects to Elders past and present.



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## Our whistleblower hotline

Qube upholds high standards of conduct and welcomes feedback from affected parties to improve our due diligence practices within our operations and supply chains. For more information about Qube's commitment to ethical conduct please visit [our website](#). If you have concerns about modern slavery, potential human rights issues, or unethical behaviour in our operations or supply chain, we strongly encourage you to contact us.



Visit [qube.com.au/whistleblowing-at-qube/](https://qube.com.au/whistleblowing-at-qube/) for more information and to report.

Your input is important, and your right to anonymity will be protected.

## Disclaimer

This statement has been prepared by Qube Holdings Limited (Qube) on its behalf and on behalf of its reporting entities in relation to their activities, and those of their owned and/or controlled entities, between 1 July 2024 and 30 June 2025. Qube has prepared this document based on information available to it at the time of preparation and it does not purport to be complete or without error. This document should be read in conjunction with Qube's other periodic and continuous disclosure announcements lodged with the ASX, including Qube's FY25 Sustainability Report, Annual Report and Corporate Governance Statement.

# Chairman & Managing Director's message

On behalf of the Board, management team and Qube's almost 10,000 strong workforce, we are pleased to present this FY25 Modern Slavery Statement under the Australian Modern Slavery Act 2018 (Cth) ('Modern Slavery Act'). As Australia's leading logistics provider of integrated import and export logistic services, our purpose is to help our customers, communities and industries to thrive.

Working with our business partners, contractors and suppliers to assess, prevent and mitigate modern slavery risks and impacts associated with our operations and supply chains is one of the many ways we deliver on this commitment.

Qube plays a pivotal role in Australia's economy. Every day we connect supply chains through port, rail and road networks to ensure the smooth movement of goods that keep industries and communities thriving. With this scale and responsibility comes an obligation to ensure that the people who underpin these services, whether employed directly by Qube or working through our suppliers and contractors, are treated with fairness, dignity and respect, consistent with our values of Integrity, Reliability and Inclusion.

We acknowledge that addressing modern slavery risks is a complex task requiring specialised competencies, processes and industry collaboration, and we are committed to taking meaningful action to build the required capabilities within our business.

Over the past year we have strengthened the foundations of our modern slavery program. We have improved our risk assessment processes, rolled out enhanced due diligence tools, reviewed our grievance and remediation procedures, and set clearer performance measures to help track progress. These steps are part of a longer journey to embed respect for human rights into the way we do business every day.

We remain committed to transparency and continuous improvement, and to working with our suppliers, partners and stakeholders to address modern slavery risks wherever they may arise.

You will find further detail on these and other initiatives underway across the business in the following pages.

## Statement approval and sign-off

This is a joint statement prepared on behalf of Qube under the Modern Slavery Act, and the reporting entities listed in this statement which, as parent entity, Qube owns and/or controls. The statement was approved by the Qube Board on 19 November 2025 in its capacity as Qube's principal governing body.



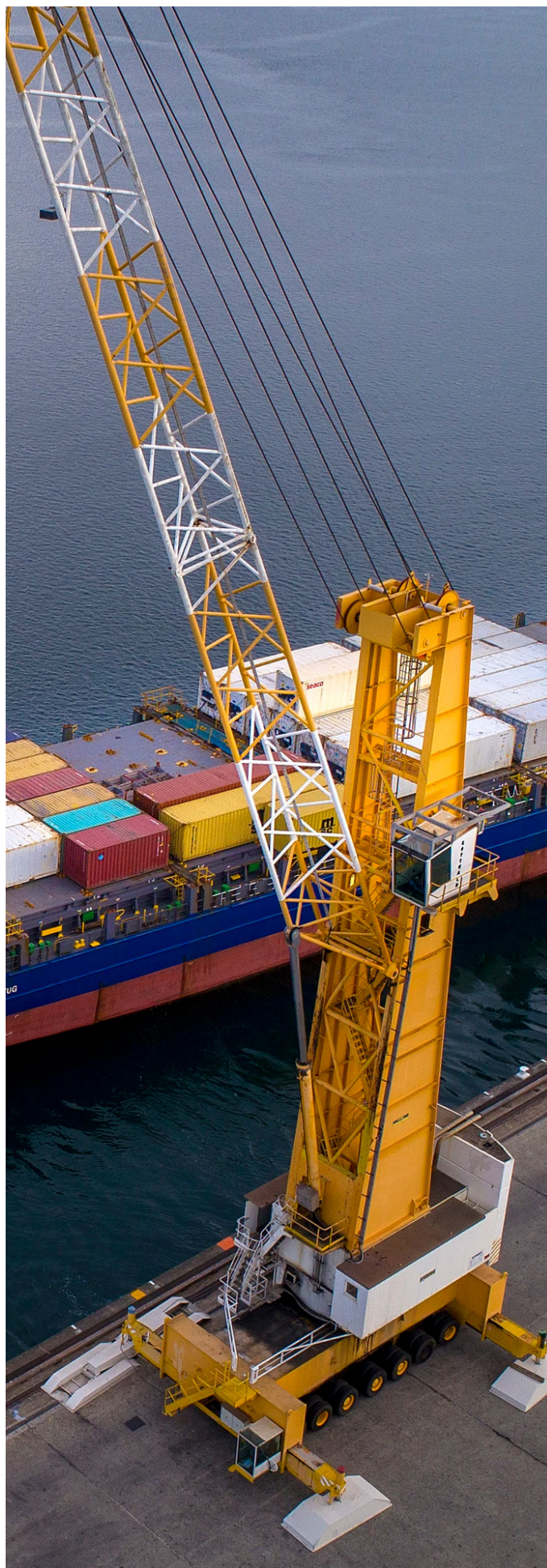
A handwritten signature in black ink, appearing to read 'Allan Davies'.

Allan Davies, OAM  
Chairman



A handwritten signature in black ink, appearing to read 'Paul Digney'.

Paul Digney  
Managing Director







# Our commitments

## Our progress against the commitments we made in FY25

●	Update risk assessment process and develop formal/informal risk tools.
●	Conduct an internal assurance process on Qube's approach to responsible sourcing.
●	Review existing grievance reporting mechanism and ensure it is fit for purpose.
●	Develop a remediation protocol to implement when issues are identified.
●	Update and refine Qube's procurement process in relation to human rights considerations.
●	Benchmark our approach to modern slavery against our peers.
●	Strengthen our engagement with joint venture partners and associates.
●	Develop Qube KPIs around modern slavery to measure how effective actions to identify and address modern slavery practices in any part of our operations and supply chains have been.

● Completed    ● Commenced

## Our commitments for the year ahead

In FY26, we will continue to deliver on the carry-over actions from FY25, including continuing to update and refine our procurement processes, strengthening our engagement with joint venture partners, and conducting an internal assurance process on Qube's approach to responsible sourcing. In addition, the following action items form our modern slavery commitments for the year ahead:

1. Continue individual supplier risk assessments, prioritised by:
  - location
  - spend
  - supplier category
  - opportunity to influence.
2. Undertake due diligence for identified suppliers focusing on Tiers 2 and 3 risk.
3. Integrate Fair Supply Spotlight Search into purchasing procedure for new suppliers.
4. Review and update modern slavery education and training materials to ensure they remain effective and relevant.
5. Conduct targeted reviews of higher risk suppliers.



# About Qube

**Qube Holdings Limited (ASX: QUB) is Australia's largest integrated provider of import and export logistics services, with a market capitalisation of approximately A\$7.6 billion as of 30 June 2025.**

As a publicly listed Australian company, Qube operates in hundreds of locations across Australia, New Zealand, and Southeast Asia and we employ around 10,000 people. The Qube Group is comprised of more than 30 entities (both reporting and non-reporting) engaged in logistics, ports, bulk, forestry, and related services. These entities are included in the scope of this statement to ensure transparency.

Our business has two core divisions: the Operating Division, and Qube's 50% interest in Patrick Terminals, Australia's leading container terminal operator. The Operating Division comprises two business units: Qube Logistics and Infrastructure and Qube Ports and Bulk.

Our role is to keep the trade of containerised goods, bulk commodities and manufactured and processed goods moving through ports, along rail networks and across road freight corridors, providing the critical link between producers, markets and consumers.

Our purpose is to help our customers, communities, industries and people to thrive through a relentless focus on our five priorities: Safety, Wellbeing, Planet, Opportunity and Performance.





# Our value chain

Qube delivers sustainable value to help our customers, investors and communities to



## Our priorities



Safety



Wellbeing



Performance



Planet



Opportunity

## Value chain

### Inputs



Group expertise



Financial capacity



Strategic assets



Environmental focus



Network



Robust business



People



Operational experience



Community



Relationships



Customer service



Governance

### Key markets



Containers import/export



Automotive and general stevedoring



Project cargo



Resources



Energy



Agriculture



Forestry

### Value drivers



### Our services and infrastructure

#### Logistics and Infrastructure

End-to-end import/export services for containerised cargo, including transport, warehousing and freight forwarding.

- Strategic network linking ports to metro and regional areas.
- Key assets:
  - AAT automotive and break-bulk terminals.
  - Grain terminals and storage and handling infrastructure in NSW.
  - IMEX and metro rail terminals.

#### Ports and Bulk

- Non-containerised freight logistics across 100+ port and 40+ bulk sites in Australia, NZ and SE Asia.
- **Qube Ports:** Custom solutions for bulk, container, automotive and general cargo, including forestry and energy.
- **Qube Bulk:** Full-service bulk handling –transport, stockpiling, mine resupply, and ship loading – specialising in large-scale exports.

#### Patrick Terminals

- Qube holds a 50% stake in Patrick, a leading Australian container stevedore.
- Operates in Melbourne, Sydney, Brisbane and Fremantle, covering 4km of quay line with 25 cranes and 130 straddles, including two automated terminals.
- Holds long-term lease concessions.

### Outcomes

- A key enabler of national, state and regional economies.
- #1 or #2 in all key markets.
- Almost 10,000 employees working in over 200 locations across Australia, New Zealand and South-East Asia.
- 50+ key services provided.
- 60+ logistics and infrastructure locations.
- 100+ port locations.
- 40+ bulk locations.
- >1,000 ha operational area.
- 2,500+ customers.
- More than \$1.2 million invested annually in community-based partnerships and sponsorships.
- 437KtCO<sub>2</sub>-e operational Scope 1 and 2 emissions.



# Our operations

As an integrated logistics provider, Qube relies on a broad network of suppliers and service partners to deliver port operations, road and rail transport, warehousing, and bulk commodity handling. Critical inputs include labour hire services, fuels and lubricants, heavy and specialised vehicles, parts and maintenance services, and electronics and IT systems.

In categories such as labour hire, transport, and site services, we maintain direct contractual relationships with suppliers that provide frontline operational support.

In other categories, such as fuels, vehicles, and electronics, our exposure is primarily through purchasing from local retailers, distributors or equipment dealers, which link us to global manufacturing and resource extraction supply chains. This means that while many of our Tier 1 suppliers are based in Australia, New Zealand and Singapore, modern slavery risks are more likely to arise in the deeper tiers of our supply chain, where visibility is limited.

## Workforce

We employ around 10,000 people across our operations, 68% of our whom are employed under an industrial instrument, such as an enterprise or collective agreement. Our remaining permanent employees are provided competitive pay and benefits and participate in an annual salary review considering their individual performance and the performance of the company. Our casual employees are remunerated under the relevant award or agreement based on their role.

Table 1: Operating Division workforce

Location	Employees	Workforce
Australia	7,932	79% Full-time 1% Part-time 20% Fixed term or casual 77.9% under industrial agreement
New Zealand	1,586	84.5% Full-time 15.5% Fixed term or casual 27% under industrial agreement
Singapore	13	100% Full-time
Indonesia	104	50% Full-time 50% Fixed term
Papua New Guinea	24	91% Full-time 9% Casual

## Supply chain

Almost all of Qube's Tier 1 suppliers (98%) are based in low-risk countries – Australia, New Zealand and Singapore, with our top five supplier categories in FY25 being fuel, grain, subcontracting, repairs and maintenance and heavy vehicle leasing. The geographical spread and modern slavery risk of our Tier 1 supply chain is illustrated below.

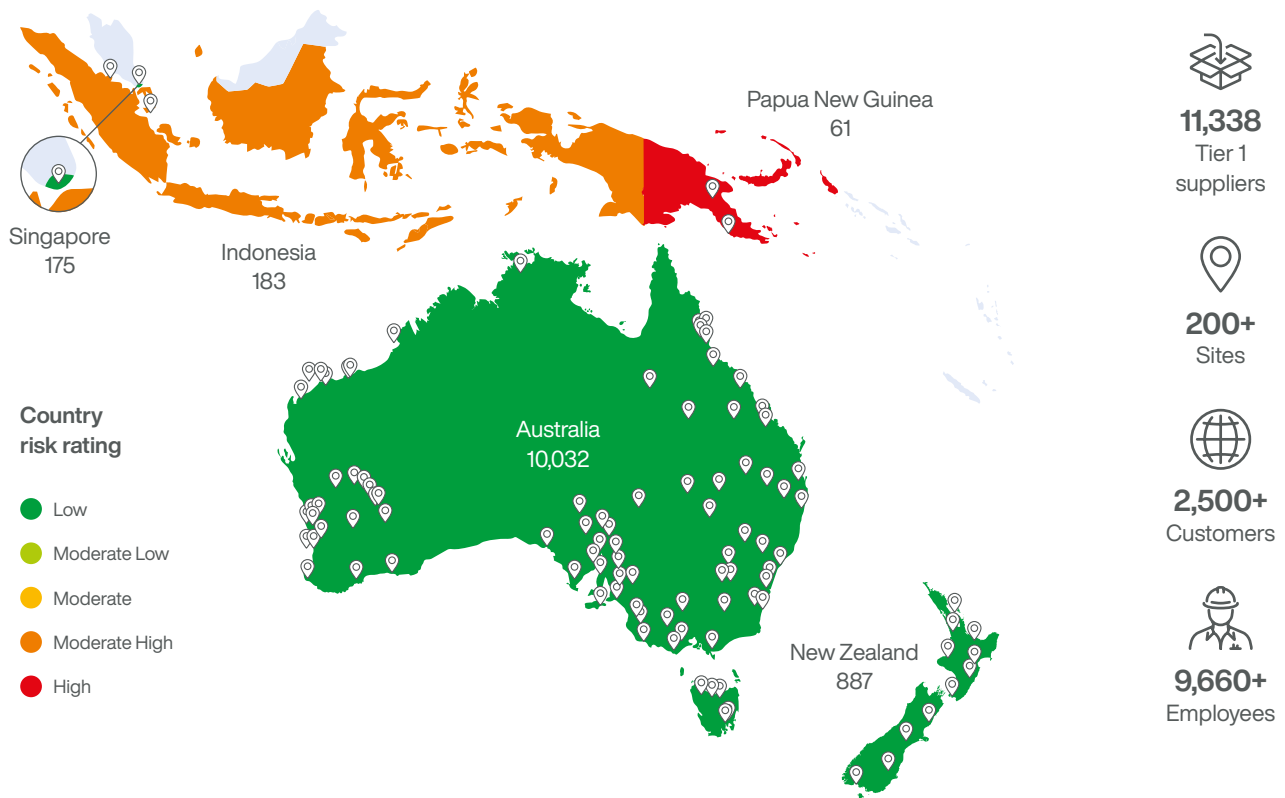


Figure 1: Total Tier 1 suppliers and Country risk rating by area of operations

\*Source: Fair Supply ESG risk management and due diligence tool. Calculates estimated country risk through a proprietary tool using a range of sources including The UN Guiding Principles on Business and Human Rights, The Global Slavery Index, International Labour Organisation (ILO) Global Estimates of Modern Slavery, and The United States' Reports on International Child Labour and Forced Labour



# Identifying risk within our supply chain

Qube recognises that while many goods and services are sourced through local suppliers, products like fuels, vehicles, parts and electronics, are ultimately connected to global supply chains where modern slavery risks are more pronounced. Our operations in higher risk geographies also present heightened risk due to weaker labour law enforcement and greater reliance on informal labour markets. Even within our key markets of Australia and New Zealand, categories such as labour hire and subcontracted services can present a higher degree of risk without appropriate due diligence, risk mitigation measures and management.

Taking these factors into account, we have identified the following categories of expenditure as carrying the highest inherent risk of modern slavery practices within our supply chains, particularly at Tier 2 and beyond.

Table 2: Categories of inherent risk

	<p><b>Fuels, oil and gas</b></p> <p>Modern slavery risks within fossil fuel and oils supply chains are significant due to the complexity, global reach, and opacity of these networks. Key issues of concern include:</p> <ul style="list-style-type: none"><li>- Extraction and mining: Workers in oil fields, coal mines, and gas extraction sites may face forced labour, poor working conditions, and limited oversight.</li><li>- Pipeline construction and maintenance: These activities often rely on subcontracted labour in remote or under-regulated regions, increasing vulnerability to exploitation.</li><li>- Shipping and logistics: Maritime transport of fuel often involves crews from low-income countries, where forced labour and human trafficking risks are high.</li><li>- Refining and processing: Refineries in countries with weak labour laws may use bonded or coerced labour.</li></ul>
	<p><b>Labour hire</b></p> <p>Modern slavery risks in labour hire arrangements can arise through underpayment and debt bondage, particularly in offshore recruitment from higher risk countries. In Australia, sectors like agriculture, cleaning, and security services often depend on seasonal or migrant workers. These workers may face heightened vulnerability to exploitation due to language barriers, visa limitations, and limited awareness of their workplace rights.</p>
	<p><b>Heavy and specialised vehicles</b></p> <p>Heavy specialised vehicles (HSV) such as container handlers, intermodal equipment, port equipment, and construction machinery rely on components sourced from multiple countries, some of which may have weak labour protections or a high prevalence of forced labour. Key concerns include:</p> <ul style="list-style-type: none"><li>- raw materials like steel, rubber, and electronics (e.g. batteries, wiring) may be mined or processed in regions where child labour or forced labour is common, and</li><li>- subcontracting and outsourcing can obscure visibility, making it difficult for buyers to trace labour conditions.</li></ul>
	<p><b>Parts and materials</b></p> <p>Parts and materials used in vehicles (especially in HSV) are a concern in relation to modern slavery because their production often involves high-risk supply chains where exploitative labour practices can occur, and include:</p> <ul style="list-style-type: none"><li>- many vehicle parts, which rely on raw materials sourced from regions with documented slavery risks, and</li><li>- parts like wiring harnesses, electronics, and textiles, which may be also produced in countries where workers may face excessive hours, low wages, and unsafe conditions.</li></ul>
	<p><b>Electronics</b></p> <p>There are significant concerns regarding labour practices and health and safety conditions within the overseas electronics supply chain, with child labour being a particular area of concern. Certain raw materials and components are especially at risk of being linked to modern slavery due to the conditions under which they are extracted or manufactured.</p>



# Prioritising human rights: managing and mitigating risk



## Human rights are fundamental to our procurement practices and engagement with suppliers.

Qube has a modern slavery protocol and Supplier Code of Conduct in place under which Qube undertakes due diligence and assessment of human rights risks in relation to prospective and current suppliers. Where we do not have direct operational control of procurement practices (for example, in relation to our non-controlled or non-operated joint ventures), we will ensure the entity is aware of its legal obligations and raise any concerns for the entity to take appropriate steps to mitigate human rights risks.

## Governance

Qube's Board is focused on material risks that can potentially undermine the strategy or viability of the Group or severely damage its reputation (Group Risks). Normal operating risks (Business Risks) are assessed and managed by the divisional and business unit operational leadership teams.

The Board has established a formal enterprise Risk Management Framework, supported by a Board-approved Risk Management Policy and Risk Appetite Statement (RAS). These documents define the parameters within which management is expected to operate and ensure alignment with Qube's purpose, values, and strategic direction.

The Board's Health, Safety and Sustainability Committee and Qube's Executive Management Team are responsible for managing both group and business risks related to human rights and the Modern Slavery Act.

## Policy and procedure

Our human rights due diligence processes are embedded within policy and procedures including:

Policy, procedures and contracts	Covers
Human Rights Policy	Our Human Rights Policy is informed by the goals and practices outlined in the UN Guiding Principles on Business and Human Rights.
Whistleblower Policy	This policy sets out the process for reporting concerns and the support, protections and remedies which persons may be eligible to access in respect of reports of Reportable Matters in accordance with relevant Legislation.
Supplier Code of Conduct	The Supplier Code of Conduct is to share our commitment, values and expectations of our suppliers. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.
Supplier agreements and contracts	Our supplier contracts and agreements include clauses in relation to compliance with human rights laws.
Code of Conduct and Ethics	The Code outlines guiding principles and examples on how the values of honesty, integrity, quality and trust are expected of Qube employees.
Health Safety and Sustainability Policy	Outline our approach to Health and Safety that reflects a shared responsibility to operate in an environment where risks are managed, and work does not impact on the health and wellbeing of others.
Recruitment procedure	Outlines the procedure for all recruitment at Qube including compliance with all relevant laws and industrial agreements.

These processes are aimed at identifying, seeking to prevent, mitigating and accounting for how we address any adverse human rights impacts concerning our business. These include:

- assessing actual and potential human rights impacts
- integrating findings into business operations and acting on them
- tracking responses and assessing their effectiveness
- communicating about how effectively we addressed those impacts throughout our employment practices, supply chain and procurement activities.

Qube will continue to evaluate the effectiveness of the policies, processes and procedures to address all modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles on Business and Human Rights. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery.



# Governance structure

## Board of Directors

The Board is responsible for overseeing climate and other sustainability-related impacts, risks and opportunities and is assisted in its oversight by its committees. Of the eight non-executive directors on Qube's Board, five have advanced knowledge and experience in sustainability management and oversight.



### Audit & Risk Management Committee

- Review integrity of Qube's financial reporting and report the results of its activities to the Board.
- Review the adequacy of Qube's corporate reporting processes, internal control framework and compliance with legal and regulatory obligations.
- Oversee operation of Qube's compliance systems and corporate governance processes.
- Review the adequacy and operation of Qube's enterprise-wide risk management framework in light of risk appetite set by the Board.



### Safety, Health & Sustainability Committee

- Oversee safety, health and environment matters arising out of the operations and activities of the Qube Group.
- Oversee Qube's sustainability strategy, activities and long-term sustainability goals and ensure sustainability is embedded into decision-making.
- Oversee the review and management of Qube's material exposure and responses to environmental risks, including climate change.
- Oversee management's implementation, monitoring and integrity of reporting of sustainable and ethical business practices of the Qube Group and its suppliers.

Oversight

Report

## Executive Management Team



### Safety, Health & Sustainability Executive Committee

Deliver Qube's sustainability programs and practices across the operations and Group functions, in accordance with our operating model.



### Systems & Innovations Executive Committee

Identify, implement and monitor efficiency improvements and technology investments, including alternative fuel and emissions reduction trials, to support decarbonisation.



### Decarbonisation Executive Committee

Set the direction for Qube's approach to decarbonisation including transition planning, climate-related risk and resilience planning, emissions reduction initiatives and monitoring and reporting.



### People & Culture Executive Committee

Deliver Qube's people and culture programs across the operations and Group functions in accordance with our operating model.

### Guiding our approach

- Qube Thrive program and Statement of Values
- Code of Conduct & Ethics
- Materiality assessment
- Safety, Health & Sustainability Policy
- Human Rights Policy
- Diversity Policy
- Whistleblower Policies
- Supplier Code of Conduct

### Managing risk

- Risk Management Framework
- Risk Management Policy
- Supplier Code of Conduct
- Investor relations program
- Anti-Bribery & Anti-Corruption Policy
- Sanctions Policy
- Delegation of Authority Policy
- Environment Standard
- Health & Wellbeing Standard

### Driving action

- Executive Remuneration Framework and key performance indicators
- Climate-related transition plan
- Reconciliation Action Plan
- Modern Slavery Statement
- Divisional and business unit strategies
- Culture Reference Group
- Gender Equality Reference Group

External audit

Internal audit



## Education, training and awareness

Qube provides training for managers and supply chain personnel on all forms of modern slavery, including how to identify and assess risks within supply chains by considering key intersecting factors such as geography, industry sector, and workforce profile. The training also covers processes for reporting and remediation of risks that are identified.

Our FY25 education, training and awareness initiatives included:

- Online SafeTrac training module to equip participants with the knowledge to identify and eliminate modern slavery risks within the supply chain, promote ethical business practices and to foster a culture of transparency and responsibility.
- Toolbox talks: equipping colleagues to identify and report signs of worker exploitation, covering 'Indications of potential exploitation in vulnerable individuals', 'What to do if something doesn't seem right', 'Call to action' and 'Further information'.
- Qube site modern slavery posters.

Between 1 July 2024 and 30 June 2025:

- 1,047 new Qube employees and contractors completed our initial online training.
- 677 employees completed our online refresher training.
- 200+ sites conducted modern slavery training sessions.
- 200+ sites displayed awareness raising posters in meal and break areas across all our operations.
- Qube has engaged with the Australian Catholic Anti-Slavery Network (ACAN) by participating in workshops and forums during FY25. Our Group Manager, Social Impact has also attended events hosted by the NSW Anti-Slavery Commissioner and other corporate modern slavery forums.

**See something. Say something.**

Modern slavery is a serious issue that affects vulnerable individuals, including migrant workers.

**Everyone has a role in preventing and reporting it.**

**What are the signs?**

Everyone plays a critical role in identifying and reporting signs of worker exploitation - below are some signs to look out for:

- Always accompanied when arriving and leaving the workplace
- Confiscation of identity documents or personal belongings.
- Isolation from the local community or other workers.
- **Social isolation and limited freedom of movement.**
- Signs of physical abuse or injuries.
- Appearing fearful or anxious.
- Living in poor, overcrowded conditions.
- Having to pay off large, unexpected debts.
- Receiving little or no pay.

**What can you do?**

- ✓ Notify your supervisor
- ✓ Contact Human Resources
- ✓ Send an email to [whistleblower@qube.com.au](mailto:whistleblower@qube.com.au)
- ✓ Complete a whistleblower form at [www.qube.com.au/whistleblowing-at-qube](http://www.qube.com.au/whistleblowing-at-qube)
- ✓ Report your concerns by telephone on (02) 9080 1900

For more information on Modern Slavery contact [corporateaffairs@qube.com.au](mailto:corporateaffairs@qube.com.au)

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## Risk management

Qube's approach to managing modern slavery risks is embedded within our governance framework, overseen by the Board's Health, Safety and Sustainability Committee and implemented through divisional risk management processes. Within this system, we use a range of tools and processes to identify, assess and address risks in our operations and supply chains.

In FY25, Qube introduced the Fair Supply ESG assessment tool as a key screening resource. Fair Supply applies multi-regional input-output models and international datasets to provide inherent risk profiles across up to ten tiers of our supply chain. This enables us to see beyond Tier 1 suppliers and identify categories and geographies where modern slavery risks are more likely to be present.

The outputs of Fair Supply enable integration into our risk management processes, with the insights gained from screening results used to:

- prioritise suppliers for further due diligence through questionnaires and engagement,
- inform training and awareness for staff and contractors working in higher-risk categories, and
- guide the development of targeted remediation protocols if risks are substantiated.

This integration allows us to refine our understanding of modern slavery risks as part of our ongoing due diligence.

## Due diligence

In FY25, we undertook a baseline screening of our top 250 suppliers by spend, representing 79% of our total Operating Division expenditure. Almost 100% of that spend is with suppliers based in low-risk countries, primarily Australia.

This exercise established a foundation for ongoing due diligence and remediation activities. Screening was conducted using spend data combined with external risk analytics, enabling visibility beyond Tier 1 suppliers and highlighting elevated risks across up to ten tiers of the supply chain.

Based on the screening outputs Qube will engage with approximately 20 suppliers identified as having the potential for 'moderate low' risk for further engagement, to identify categories requiring enhanced oversight, and to guide the design of remediation protocols should issues be identified.

### Key insights from this baseline included:

- Labour hire at Tier 1: flagged as the highest risk category in Australia, particularly for migrant and subcontracted workers who may not be aware of their rights.
- Fuels, oils and gases at Tier 2 and beyond: identified as a major exposure area given the global sourcing of these commodities from countries with weaker labour protections.
- Specialised vehicles and equipment: one direct supplier in China rated as moderate risk, with elevated exposure in lower-tier inputs such as batteries and electronics.

By grounding risk analysis in categories and suppliers we can influence, this approach ensures our due diligence is actionable.





## CASE STUDY

### Developing our baseline

Incorporating company spend data throughout global markets, we utilised external consultants, Fair Supply, to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Qube's top suppliers by spend<sup>1</sup>.

This multi-faceted approach to modern slavery risk assessment has included examination and analysis of the following:

- Individual suppliers and industries with the most elevated risk of modern slavery.
- Supply chain plots to provide a visual representation of the supply chains for Qube's top three first tier industries.
- Plotting the relative slavery risk in the supply chain by tier, up to tier 10.
- Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world.
- An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk.

Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.

### Our findings

Our top 250 suppliers represented 79% of our total Operating Division spend at the time of assessment, with 98% of that spend with suppliers based in low-risk countries, primarily Australia.

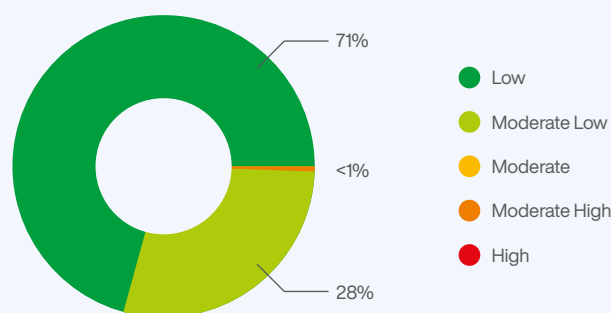


Figure 2: Supplier risk profile

As acknowledged in previous disclosures, our highest risk category for our Tier 1 spend continues to relate to labour hire. While Australia has robust labour laws, there is still a risk particularly for migrant workers who may not be aware of their rights and employer obligations. Qube is aware of these risks and works with reputable recruitment agencies to ensure that all employees are aware of their rights prior to commencement of employment. As part of any engagement with a labour hire provider, Qube conducts a thorough due diligence process to ensure it is a legitimate business and will operate legally and ethically in relation to their employment and other obligations, including with respect to modern slavery. We continue to look for opportunities to further strengthen our due diligence processes for labour hire providers, with specific requirements regarding modern slavery now embedded in our standard contracts. We also have mechanisms for employees to report any breaches confidentially.

<sup>1</sup> This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in Qube's supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.



## Grievance and remediation mechanisms

Qube recognises that effective grievance mechanisms are a core element of our human rights governance framework. These mechanisms provide pathways for concerns to be raised, assessed, and, where substantiated, remediated in a manner consistent with the UN Guiding Principles on Business and Human Rights (UNGPs).

In FY25, we reviewed our **Whistleblower Policies** and procedure to ensure compliance with legislative requirements and the ASX Corporate Governance Principles and Recommendations. This policy, accessible on our website and via our employee app (Qube+), remains an important channel for staff and contractors to raise concerns confidentially. In addition, grievance channels are embedded in our procurement processes: our Supplier Code of Conduct requires suppliers to provide safe and accessible grievance mechanisms for their workers, and our supplier engagement process includes awareness-raising about Qube's reporting channels.

Reports received through any channel are initially reviewed by our Director of People, Culture and Safety and, where relevant, escalated to the Executive Management Committee. Contact officers trained in trauma-informed investigation support are available to coordinate workplace investigations and ensure appropriate protections for individuals who raise concern.

We also launched a new **Ethical Conduct** page on our website which focusses on outlining Qube's commitment to ethics and human rights and providing resources for stakeholders, suppliers, customers and workers.

## Remediation approach

Qube's remediation procedure is guided by the UNGP framework and informed by Walk Free's Response and Remedy Framework. The process emphasises protecting people first, taking responsibility, listening to victims, investigating and verifying concerns, and implementing remedy and preventive measures.

While no instances of modern slavery were identified in FY25, we recognise that any suspected instance would require a tailored response. In such cases, Qube would convene a response team appropriate to the industry, geography, and nature of the vulnerability, always ensuring the anonymity, dignity and agency of the affected person(s).

In the event of a reported incident, remediation outcomes are tracked and reported through to the Board, and insights are fed back into our risk management and supplier engagement processes. This ensures remediation is not only about addressing individual concerns but also about strengthening Qube's overall ability to prevent future harm.

### Protect people first

- 01 Investigate and verify
- 02 Escalation

### Take responsibility

- 03 Remediate harm to workers
- 04 Incident reporting and tracking

### Listen to victims

- 05 Mitigate and prevent future harms
- 06 Review

Source: Walk Free Foundation Modern Slavery Response and Remedy Framework.



# Assessing the effectiveness of our actions

Responsibility for assessing effectiveness sits with Qube’s Group Manager, Social Impact, who collates results and reports quarterly to the Executive Management Team. The Executive Management Team provides oversight of performance and ensures findings are considered by the Board as part of its annual review of the Modern Slavery Statement. Key performance indicators (KPIs) used in this assessment have been divided into four key focus areas:

Table 3: Qube modern slavery KPIs

<b>Governance and due diligence</b> <ul style="list-style-type: none"><li>- Implementation of Fair Supply.</li><li>- Review risk management framework.</li><li>- Ensuring policy and procedures are aligned with any changes to the Modern Slavery Act or new laws within our areas of operations.</li></ul>
<b>Education and training</b> <ul style="list-style-type: none"><li>- Number of employees or contractors completing modern slavery awareness training.</li><li>- Participation in external Human Rights and modern slavery networks and events by program managers.</li><li>- Mark International Day for the Abolition of Slavery on 2 December 2025, through internal communications channels.</li></ul>
<b>Procurement and supply chain</b> <ul style="list-style-type: none"><li>- The percentage of contracts with modern slavery clauses included.</li><li>- Number of suppliers completing our modern slavery questionnaire.</li><li>- Complete new supply chain heat mapping exercise of suppliers across our areas of operations.</li></ul>
<b>Reporting and response</b> <ul style="list-style-type: none"><li>- Number of modern slavery cases identified and remediated.</li><li>- Report to the Executive Management Team quarterly on progress.</li></ul>

While the KPIs have been developed for implementation in FY26, we have been able to report progress in FY25 against the following KPIs in this document:

- Commencement of implementation of Fair Supply
- Number of employees completing modern slavery compliance training
- Number of contracts including modern slavery clauses
- Review of our risk management framework
- Participation in events and networks

# Consultation

During the reporting period covered by this statement, Qube actively engaged and consulted with all the companies we own or control in the development of this statement, namely the entities mentioned in Appendix 2.

Qube discussed details of the Modern Slavery Act reporting requirements with these entities and their key representatives, including information about the actions Qube intends to take over the next few years to address these requirements, raise awareness of modern slavery risks and grievance reporting mechanisms and reduce modern slavery risks through operations and supply chains. Qube also provided these entities and their key representatives with relevant resources, materials and updates.



# Appendix

## Appendix 1: Regulatory disclosure matrix

This Statement was prepared to meet our regulatory disclosure requirements and complements our existing sustainability disclosures found in the [Qube FY25 Sustainability Report](#). This Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth). The table below references where we address the mandatory criteria within this statement.

Australian Modern Slavery Act 2018 (Cth) reporting criteria	Where criteria are addressed in this report
<b>Criterion 1:</b> Identify the reporting entity.	Page 3 - About Qube
<b>Criterion 2:</b> Describe the structure, operations, and supply chains of the reporting entity.	Page 3 - Our operations
<b>Criterion 3:</b> 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.	Page 6 - Identifying risk within our supply chain
<b>Criterion 4:</b> 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.	Page 7-12 - Prioritising human rights: managing and mitigating risk
<b>Criterion 5:</b> Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Page 13 - Assessing the effectiveness of our actions
<b>Criterion 6:</b> Describe the process of consultation with any entity the reporting entity owns or controls.	Page 13 - Consultation
<b>Criterion 7:</b> Any other relevant information.	Page 14 - Appendix

## Appendix 2: Qube Group entities

Entities for the purpose of this Statement as at 30 June 2025.

Entity	ABN
1 Qube Holdings Limited (parent entity) <sup>1</sup>	14 149 723 053
2 Australian Amalgamated Terminals Pty Ltd <sup>1</sup>	13 098 458 229
3 Bluewood Industries Pty Ltd as Trustee for the CSR Trust <sup>2</sup>	26 099 459 809
4 C&H Acquisition Pty Ltd <sup>2</sup>	48 600 205 909
5 CTC Terminals Pty Ltd <sup>2</sup>	52 138 486 147
6 Giacci Bros. Pty Ltd <sup>1</sup>	66 008 708 361
7 Harvestco Australia Pty Ltd <sup>2</sup>	13 122 876 019
8 Kalari Proprietary Limited <sup>1</sup>	14 004 595 395
9 Maritime Container Services Pty Ltd <sup>2</sup>	69 001 169 240
10 Quattro P RE Services Pty Ltd as Trustee for the Quattro Grain Trust <sup>2</sup>	63 472 949 145
11 Qube Bulk Pty Ltd <sup>1</sup>	13 138 868 756
12 Qube Energy Pty Ltd <sup>1</sup>	33 006 430 039
13 Qube Forestry Pty Ltd <sup>2</sup>	55 152 640 009
14 Qube Grains Pty Ltd <sup>1</sup>	62 613 560 400
15 Qube Heavy Lift Pty Ltd <sup>1</sup>	78 095 626 798
16 Qube Logistics (Aust) Pty Ltd <sup>2</sup>	18 123 003 930
17 Qube Logistics (Global) Pty Ltd <sup>2</sup>	71 123 236 260
18 Qube Logistics (NSW) Pty Ltd <sup>2</sup>	99 123 022 588
19 Qube Logistics (QLD) Pty Ltd <sup>1</sup>	21 009 677 383
20 Qube Logistics (QLDT1) Pty Ltd <sup>2</sup>	53 010 235 935
21 Qube Logistics (Rail) Pty Ltd <sup>1</sup>	63 082 313 415
22 Qube Logistics (SA) Pty Ltd <sup>2</sup>	43 087 193 299
23 Qube Logistics (SA1) Pty Ltd <sup>2</sup>	21 008 263 474
24 Qube Logistics (SB) Pty Ltd <sup>1</sup>	83 003 307 319
25 Qube Logistics (SL) Pty Ltd <sup>2</sup>	90 004 935 915
26 Qube Logistics (VIC) Pty Ltd <sup>1</sup>	72 092 352 228
27 Qube Logistics (WA) Pty Ltd <sup>2</sup>	68 087 193 342
28 Qube Logistics (WA1) Pty Ltd <sup>2</sup>	65 093 981 134
29 Qube Logistics (WA2) Pty Ltd <sup>2</sup>	41 130 530 111
30 Qube Offshore Services Pty Ltd <sup>2</sup>	24 164 301 008
31 Qube Ports (No 1) Pty Ltd <sup>2</sup>	74 128 404 900
32 Qube Ports Pty Ltd <sup>1</sup>	46 123 021 492
33 Stevenson Logistics Pty Ltd <sup>2</sup>	65 008 784 950
34 LCR Mining Group Pty Ltd as Trustee for the LCR Mining Group Trust <sup>2</sup>	42 135 447 506

<sup>1</sup> These entities are reporting entities for the purposes of the Australian Modern Slavery Act.

<sup>2</sup> These entities are not reporting entities for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.



## Contact

Ben Pratt, Director Corporate Affairs  
Qube Holdings Limited

Level 27, 45 Clarence Street  
Sydney NSW 2000

E: [corporate.affairs@qube.com.au](mailto:corporate.affairs@qube.com.au)  
P: +61 2 9080 1900



**qube.com.au**