

# Modern Slavery

## Guide for suppliers and subcontractors

Version 1\_February 2026

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# Understanding and addressing Modern Slavery

Qube is committed to protecting human rights and ensuring our operations and supply chain are free from modern slavery. As a valued supplier, you play a critical role in helping us identify, prevent and address risks. Our expectations are shaped by the *Modern Slavery Act 2018* (Cth), our annual [Modern Slavery Statements](#), and leading Australian industry guidance.

This guide outlines what modern slavery is, why it matters, and what Qube requires from suppliers.

## What is Modern Slavery?

Modern slavery refers to serious forms of exploitation, including:

- forced labour.
- servitude
- slavery
- human trafficking
- debt bondage
- deceptive recruitment
- forced marriage
- the worst forms of child labour

These practices involve coercion, threats or deception that prevent a person from refusing or leaving work. Modern slavery is often hidden and can occur in any country or industry.

## Why this matters to Qube and our suppliers and subcontractors

Modern slavery undermines responsible business, distorts markets and exposes workers to severe harm. It also creates legal and reputational risks for organisations that fail to adequately manage it.

As Australia's largest integrated logistics provider, Qube has a large and diverse supply chain that includes contractors, labour hire providers, port services, transport suppliers, equipment manufacturers, construction partners, primary producers and many others.

## Qube's risk profile

Qube recognises that while many goods and services are sourced through local suppliers they are ultimately connected to global supply chains where modern slavery risks are more pronounced.

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 1: Qube's inherent supply chain 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>

# Our expectations of our suppliers and subcontractors

Qube integrates modern slavery considerations into procurement processes and contracts and in our [Supplier Code of Conduct](#). This includes:

- specific tender clauses,
- minimum compliance standards, and
- audits and corrective action plans.

All Qube suppliers must:

- understand modern slavery and relevant legal obligations,
- implement policies, due diligence and worker protections,
- train personnel,
- maintain mechanisms for safe reporting, and
- cooperate with Qube on assessments, audits and remediation.

## Qube’s approach to collaborative risk mitigation

Qube takes a risk-based approach to managing our modern slavery obligations. We use the [Fair Supply](#) platform monitor and manage our supply chain focussing on our highest risk suppliers by spend and industry.

The Fair Supply platform rates suppliers Modern Slavery risk on a five-point scale Low, Moderate Low, Moderate, High, Very High. All suppliers with a total annual spend of \$250,000 have already been assigned a risk rating. We are happy to share this rating with you on request.

**Table 2: Example of risk rating within Fair Supply.**

#	COMPANY	SECTORS	SPEND	ESTIMATED PEOPLE IN FORCED LABOUR PER \$M	ESTIMATED PEOPLE IN FORCED LABOUR	SHARE OF ESTIMATED PEOPLE IN FORCED LABOUR	INDUSTRY RATING	RISK MITIGATION SCORE	ADJUSTED RISK RATING	CATEGORY
1		Health and social work services		1.0443	0.3236	1.7667%	High	Request	High	-
2		Construction work		0.732	0.1017	0.5550%	Moderate High	Request	Moderate High	-
3		Supporting and auxiliary transport services; travel agency services		0.5063	0.0694	0.3787%	Moderate High	Request	Moderate High	-
4		Insurance and pension funding services, except compulsory social security services <a href="#">Show More</a>		0.2335	0.0205	0.1119%	Moderate	Request	Moderate	-
5		Paper and paper products <a href="#">Show More</a>		0.1455	0.0678	0.3703%	Moderate	Request	Moderate	-

If your organisation's risk rating is Moderate or higher, you will be contacted by Qube and asked to complete an online Self-Assessment Questionnaire (SAQ) issued by Fair Supply.

Should any areas of concern arise from the SAQ process Qube will request a site audit or worker interviews conducted by an independent third-party agency such as QIMA. If any further action is required as a result of the audit, Qube will work with you to address any issues.

<sup>i</sup> As part of thorough due diligence, Qube may focus on specific high-risk products or industries, which may include suppliers with total spend under \$250,000.

## What to do if you identify modern slavery risks

Suppliers must:

1. Immediately notify Qube via their procurement contact, by emailing [modernslavery@qube.com.au](mailto:modernslavery@qube.com.au) or through Qube's [whistleblowing report form](#)
2. Protect affected individuals or workers first (safety and wellbeing are paramount).
3. Provide information on what has occurred.
4. Work collaboratively with Qube to implement an appropriate remediation plan.
5. Document changes to prevent recurrence. Qube does not expect zero risk, but we do expect transparency, action, and improvement.

## Need help?

For further support email [modernslavery@qube.com.au](mailto:modernslavery@qube.com.au) or speak with your contract manager.

## Additional resources

The following resources provide practical templates, risk indicators, and remediation frameworks.

- [Modern Slavery in Australia](#)
- [Good Practice Toolkit: Strengthening Modern Slavery Responses](#)
- [Modern Slavery Risk Management Playbook for SMEs](#)
- [Effective Grievance Mechanisms Case Studies](#)
- [Importing risk | Walk Free](#)
- [Maritime Supply Chain Guidance \(2020\)](#)