

Introduction

Port of Portland Pty Ltd (POPL) recognises its duty to conduct business responsibly in all its activities and towards all its stakeholders.

As the owner of essential infrastructure, POPL considers that high standards of business performance include a responsible approach to environmental, social and governance (ESG) issues makes good business sense and is more likely to create longer term sustainable value.

POPL takes into consideration long term ESG factors in making business decisions and actively manages its operations by supporting improved implementation of ESG factors and associated risks. Strong ESG credentials across all POPL operations is key to the alignment of the interests and objectives of stakeholders.

The principles set out in this policy record how POPL views its responsibilities and how they apply in a way to the day to day running of the business. They are reviewed periodically to ensure they remain consistent with best practice and stakeholder expectations.

Environment

POPL considers that environmental issues relating to its operations should be managed appropriately.

It is POPL's policy to minimise any negative impact on the environment arising from its operations. This includes but is not limited to:

- Respecting the environment and the habitat we work in, and considering the potential impact on the environment prior to commencing operations
- Ensuring compliance with POPL's EPA licences and statutory obligations
- The efficient use of energy including a transition to renewables
- Correct storage, usage and disposal of any hazardous materials
- Promote a paperless paper environment across POPL
- Recycling and using recycled products

In making any investment decisions, environmental factors will be considered as part of the assessment criteria:

- Climate change
- Emissions (including carbon emission reduction schemes or emissions trading schemes and carbon prices)
- Water supply risks including supply costs and water restrictions
- Waste disposal and waste treatment costs including recycling
- Energy type with a focus on renewables
- Energy security
- Remediation risks and costs

Social

POPL's business activities involve significant interaction with the Portland community. POPL places importance on its interface with employees, contractors, suppliers,

customers, the local community and stakeholders. Social licence to operate is achieved through maintaining a focus on those key issues that are important to the community which includes employee diversity, employee safety and strong community relationships built on transparency and trust.

It is POPL's policy to maintain positive relationships with its employees and key stakeholders by:

- Being open and transparent with our employees
- Providing a flexible, supportive, inclusive, healthy and safe working environment
- Providing a stimulating work environment where employees have the opportunity to develop their skills
- Being respectful and encouraging diversity amongst our staff, customers and suppliers,
- Providing professional development opportunities
- Supporting community groups and initiatives through a transparent, broad-based, equitable and fair community grants program
- Providing leadership in ESG principles and actions within the community
- Supporting the Principles of Fair Trade and not contributing to any practice where there may be abuses of human rights or exploitation of any kind
- Monitoring supply chains and key supply risks, including Child Labour and Modern Slavery
- Consideration of Indigenous rights and issues (including native title claims, artefacts and related risks)

Governance

Strong internal governance, audit, risk management, compliance and business continuity plans and procedures are critical to the ongoing business success.

It is POPL's policy to maintain best practice governance standards by:

- Conducting its business ethically, implementing good corporate governance, compliance and risk management
- Promoting responsible and compliant business practices
- Ensuring POPL's Risk Management Plan, Business Continuity Plan and other policies and procedures are designed to maintain resiliency and ongoing performance of the business and conform to industry best practice
- Regularly auditing our business for compliance with standards and stakeholder expectations

Governance factors considered include:

- Quality of management
- Reporting frequency and adequacy
- Contractual arrangements, protections and risks
- Change in laws and change in policy risks
- Cybersecurity, data protection and privacy
- Conflicts of interest
- Bribery, corruption and fraud
- Whistleblower protections

RELATED DOCUMENTS

- Equal Employment Opportunity Policy
- Employment Policy
- Harassment Policy
- Grievance Policy
- Whistleblower Procedure
- POPL ESG Charter
- Diversity Policy
- Code of Conduct Policy

HISTORY

Version Number:	Date:	Revision details:	Reviewed By:
1.0	May 2020	New document	CEO
2.0	Sept 2022	Document review	CEO
3.0	July 2023	Document review	CEO



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Chief Executive Officer

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