

## **Introduction**

Port of Portland Pty Ltd (POPL) recognises its duty to behave responsibly in its business activities and towards those whom its actions affect.

As the provider of essential infrastructure, POPL considers that a high standard of business conduct as well as a responsible approach to environmental, social and governance (ESG) issues makes good business sense and is more likely to create sustainable value over the long term. Conversely, poor management of those issues may pose a risk to the reputation and value of the business.

POPL considers long term ESG factors in making business decisions and in actively managing its operations, encouraging better management of ESG factors and associated risks. Exhibiting strong ESG credentials across all POPL operations is key to the alignment of the interests and objectives of investors with those of POPL's customers and the Portland community.

The principles set out in this policy record how POPL views its responsibilities and how they apply in a practical way to the day to day running of the business. They are reviewed from time to time to ensure they remain relevant in a changing world and consistent with best practice.

## **Environment**

POPL considers that environmental issues specific 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 any actions
- Ensuring compliance with POPL's EPA licences and statutory obligations
- The efficient use of energy, including via energy efficient lighting, using energy efficient appliances and other measures to conserve energy
- Correctly storing, usage and disposal of any hazardous materials
- Minimising the use of paper and other resources including by disseminating documentation electronically, discouraging printing and by printing double-sided where printing is required
- Recycling and using recycled products.

Furthermore, in making any investment decisions, the following environmental factors will be considered as part of the assessment process:

- 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
- Energy use and energy prices
- Resource scarcity and resource price shocks (e.g. oil price shocks)
- Remediation risks and costs

## Social

The nature of POPL's business involves significant employment and interaction with the Portland community. POPL places a large degree of focus on its interface with employees, contractors, suppliers, customers, the local community and wider society. Attaining a social licence to operate is achieved through a focus on diversity, employee safety, community relationships developed through the employment of local people and companies and the sponsoring of local events.

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

- Sharing a close relationship with our employees
- Providing a flexible, supportive, inclusive, healthy and safe working environment
- Providing a stimulating work environment where employees can grow and expand their skill set
- Being respectful and encouraging diversity amongst our staff, clients and suppliers,
- Providing in-house training and encouraging staff to continue their learning by attendance at professional development conferences and by undertaking further relevant study
- Supporting those staff members who perform their own charitable works and community involvement where possible
- Supporting community groups and initiatives through a transparent, broad-based, equitable and fair donations 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 potential 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 vital to the ongoing success of POPL's business.

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

- Conducting its business ethically, maintaining good corporate governance, compliance and risk management
- Promoting responsible business practices
- Understanding that good corporate governance and effective management are vital to the successful implementation of its corporate objectives
- 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 community expectations

Governance factors considered typically 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

<b>Version Number:</b>	<b>Date:</b>	<b>Revision details:</b>	<b>Reviewed By:</b>
1.0	May 2020	New document	CEO

Approved By:

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Executive Officer

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