



ESG Policy

1 Objective

Gladstone Ports Corporation (GPC) aims to ensure that it achieves sustainable Environmental, Social and Governance (ESG) outcomes consistent with the Queensland Government's policy requirements and reporting frameworks, aligned with United Nations Sustainable Development Goals, World Port Sustainability Program and the Reef 2050 Plan.

GPC's responsibilities are long-term in nature and the prosperity of customers, local and Queensland communities depends on a healthy environment, social cohesion, transparent governance and economic contribution through trade facilitation and diversification.

2 Scope

This Policy applies to all GPC Directors, Employees and other people entering, or working on GPC owned and operated sites, or undertaking activities on behalf of GPC.

This Policy applies to all GPC controlled activities.

3 Commitments

GPC commits to:

- Demonstrate strong leadership, influencing port users and be a leading example in the industry.
- Ensure ESG matters are identified and considered in responsibly managing, developing and facilitating sustainable growth and prosperity of our ports and the region.
- Adopt a whole of business, integrated approach ensuring ESG is sustainably embedded and aligned with the corporate strategy.
- Respond to climate change and reduce our GHG emissions, aligned to Queensland government policy to Net Zero by 2050.
- Plan for potential adverse impacts of development on climate change and seek to address the impacts through sustainable development and responsive infrastructure.
- Develop open and transparent communication in a strategic, coordinated, controlled and genuine manner, while ensuring continuous (ongoing) engagement with the community.
- Recognise the value of effective communication in establishing relationships across a wide range of audiences.
- Educate and encourage internal and external stakeholders to join the sustainable ESG journey.
- Report to internal and external stakeholders on ESG performance, as and when required, including through the annual report.
- Develop and foster positive partnerships with the community, Port Users and research institutions, encouraging regional prosperity.
- Transitioning beyond compliance and create positive change.
- Embrace and adopt new technology and automation where it makes sound business sense in a quickly changing world.

- Promote reconciliation while raising awareness, knowledge and understanding of the histories and cultures of First Nations peoples and their communities.
- Create a culturally safe and appropriate work environment and community where each individual can contribute, learn and grow.
- Enact GPC's regulatory responsibilities to ensure growth and development is managed and facilitated in a sustainable and socially responsible manner.
- Infrastructure optimisation and beneficial reuse are prioritised prior to new development.
- Take proactive measures and develop effective systems to ensure that GPC does not contribute to or conduct unethical business with parties that contribute to modern slavery.
- Expect a similar standard of sustainable ESG from our suppliers, contractors and customers.

4 Roles and Responsibilities

To ensure that GPC complies with its ESG duties and obligations;

The Board is responsible for:

- Setting GPC's strategic direction, tone and culture;
- Reviewing and approving the Governance Framework, including this Policy and other Governance processes as appropriate;
- Understanding GPC's risk profile, setting the Board Risk Appetite and ensuring GPC has appropriate structure, resources and systems to reduce risks to so far as is reasonably practicable;
- Monitoring and reporting on the performance of GPC to ensure duties are being met; and
- Exercising due diligence and care to meet legislative and ethical requirements.

The Chief Executive Officer and Executive Leadership Team are responsible for:

- Promoting leadership, values and culture;
- Ensuring this Policy and GPC's management systems are used in business planning to set and review objectives and targets aimed to execute the strategic direction;
- Implementing this Policy through adequate resources;
- Promoting and ensuring compliance with this Policy, regulatory obligations, our Code of Conduct and GPC's management systems and frameworks;
- Ensuring GPC systematically reduces risks to so far as is reasonably practicable through robust management systems;
- Monitoring controls implementation and effectiveness through verification and reporting processes, including ensuring processes to receive and respond promptly to hazards, risks and incidents ; and
- Performance reviews, overseeing corrective actions and reporting to the Board, including any material non-conformances with this Policy.

All Employees and other workers are responsible for:

- Understanding and working in accordance with this Policy and complying with all relevant legislative, Code of Conduct and management system requirements;
- Taking reasonable care and ensuring their acts or omissions do not adversely affect themselves, GPC and others;
- Supporting and promoting positive and above the line behaviours and actions; and
- Reporting near misses, incidents and hazards to support GPC as a learning organisation.

5 Implementation

GPC operates under certified management systems which provide the frameworks to implement the ESG commitments. These are supported by specific Policies, Standards, Strategies and associated Procedures, processes and training to implement.

Conformance to this Policy will be monitored through committees, external/internal audits and review processes.

The Policy will be communicated through relevant GPC Inductions and made available on the internal and external websites.

A Policy Commitments Statement will also be displayed at all workplaces to further support communication and awareness, which will be reviewed regularly in line with this Policy.

6 Governance

GPC is a Government Owned Corporation and is required to comply with its own and the State Governments Corporate Governance obligations and all applicable legislation.

This Policy forms part of the implementation of and compliance with these requirements.

Under GPC's Corporate Governance Framework, all Policies are owned by the Board.

7 Document control

Formal review, consultation and authorisation processes are to be led by the Executive General Manager Safety and ESG to ensure the Policy remains current and fit for purpose at a minimum every 2 years. Reviews can be carried out at any time if it becomes evident that the document requires amendment due to changes in associated legislation and/or business processes.

Version No.	Revision date	Revision description	Responsible ELT	Endorsed by	Approved by
1	28/02/2026	Create new Policy in alignment with new template/format	EGMSESG	CEO and ELT 27/02/2024	BOARD 29/02/2024
2	09/02/2026	2 yearly scheduled review	EGMSESG	CEO and ELT	BOARD 26/02/2026

If you require any further information, please contact the Responsible ELT.

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The current version of this Policy is available on GPC's Intranet.

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