

	<p style="text-align: center;">Modern Slavery Statement</p> <p style="text-align: center;">HOLDCO HOLDINGS PTY LTD</p>	<p style="text-align: center;">HR POL 004 Version No: 02 Approved By: Brent Nally</p>
<p style="text-align: center;">Created Date: 26 April 2021</p>	<p style="text-align: center;">Last Revision Date: 14 June 2022</p>	<p style="text-align: center;">Printed Date: 30 October 2023</p>

## MODERN SLAVERY STATEMENT 2023

### 1. Introduction

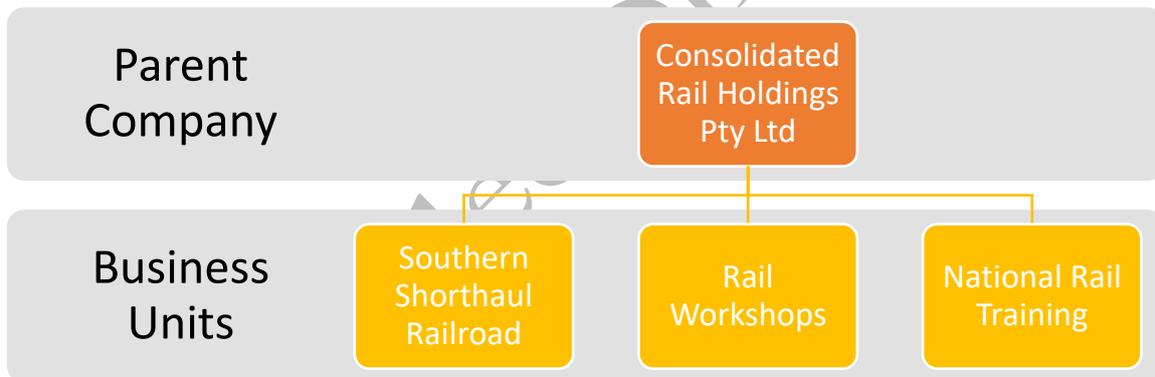
This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) for Consolidated Rail Holdings Pty Ltd including all wholly owned subsidiaries<sup>1</sup> (**Holdco**) for the period 1 July 2022 to 30 June 2023 (reporting period).

The ‘Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities’ (**Guidance**) describes modern slavery as *situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom*. It refers to *serious exploitation and encompasses human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment, and the worst forms of child labour*.

The Holdco head office is situated at 175 Murphy Street, East Bendigo, Victoria, and is committed to operating in a lawful manner with high ethical standards.

### 2. Our structure, operations and supply chains

Holdco is an Australian owned and operated customer-focussed full-service rail business operating throughout Australia. Striving to be more than just an expert rail freight services operator, Holdco has the ability and expertise to provide its customers with flexible and responsive equipment servicing and repair.



#### Southern Shorthaul Railroad (SSR)

SSR is an accredited rail operator with rail freight trains operating predominantly in New South Wales and Victoria. The core markets SSR operates in are:

- Grain and coal haulage;
- Infrastructure work trains;
- Intermodal freight;
- Testing and commissioning; and
- Rollingstock transfers.

<sup>1</sup> Including Holdco Holdings Pty Ltd, Coalemp No 2 Pty Ltd, Coalemp No 3 Pty Ltd, Coalemp No 4 Pty Ltd, Bendigo Rail Workshops Pty Ltd, Lithgow Railway Workshops Pty Ltd, and BN Rail Maintenance Pty Ltd.

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**Rail Workshops (RW)**

Based in Bendigo and regional New South Wales, RW provides full maintenance services to both freight and passenger rail customers. The core services offered by RW include:

- Routine servicing, provisioning, and wagon periodic maintenance;
- Repairing locomotive faults, changing out core components such as traction motors, power assemblies, engines, compressors, alternators, main generators, wheelsets and installing new ICE radio equipment;
- Upgrade and project specific tasks for passenger rail assets including component change outs and full paint works;
- Accident repairs;
- Full strip down and overhaul;
- Bogie overhauls;
- Painting;
- Field service and provisioning; and
- Emergency recovery.

**National Rail Training (NRT)**

NRT is a Registered Training Organisation specialising in the delivery of rail specific training to SSR to ensure all staff within the organisation are trained and competent to complete their everyday tasks efficiently and safely.

The Holdco workforce consists of more than 350 employees based throughout New South Wales and Victoria.

Our main supply chain comprises a mixture of government entities, multi-national or national companies and local supplier partners that provide products or services. All regular suppliers are based within Australia.

Core Areas of the Supply Chain		
Southern Shorthaul Railroad	Rail Workshops	National Rail Training
<ul style="list-style-type: none"> <li>• Fuel</li> <li>• Track access</li> <li>• Rollingstock hire</li> <li>• Maintenance of rollingstock including spare parts</li> <li>• Accommodation</li> <li>• Motor vehicle management</li> <li>• Information technology</li> <li>• Consumables</li> <li>• Recruitment</li> </ul>	<ul style="list-style-type: none"> <li>• Raw materials for manufacture</li> <li>• Components and spare parts</li> <li>• Consumables</li> <li>• Recruitment</li> </ul>	n/a

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### 3. Consultation with Holdco entities

Holdco either owns or operates the entities in its corporate structure. All business units owned and/or operated by Holdco have common executive management and directorships. This team provides corporate direction, oversight, and risk management across the Holdco structure.

Through the common executive managers and directors, the Holdco business units were engaged in the consultation process for this joint statement, and it has the approval of all business units in the Holdco structure.

### 4. Risks of modern slavery practices in Holdco operations and supply chains

The Guidance describes the risks of modern slavery practices as the potential for an entity to *cause, contribute to, or be directly linked to modern slavery through its operations and supply chains*. There is minimal risk of causing modern slavery as Holdco has policies, procedures and practices in place to ensure that our business remains legally compliant, ethical, and in accordance with human rights standards. Employee entitlements and workplace conditions are governed by awards, enterprise agreements, and/or common law contracts. Employees are subject to policies and procedures that ensure they are treated, and treat each other, with fairness, respect and dignity, in accordance with applicable laws.

Holdco acknowledges there is potential risk of modern slavery practices in its supply chain. This risk has been assessed to be very low due to the high compliance, component quality tracing and regulatory nature of the rail industry. This ensures suppliers are assessed by senior management prior to any engagement. The risk is further reduced by having no direct international suppliers.

Since Holdco's last Statement was made, it has engaged, and is considering engaging additional, skilled labour from overseas in order to meet local labour shortages. Holdco has taken care to ensure that the entities it uses for this process are registered migration agents with a strong code of conduct (including a commitment to adhere to Australian migration law), a sound reputation, and hold peak body memberships. Holdco made its expectations regarding modern slavery clear when engaging and working with supplying entities. Holdco requested and reviewed, to its satisfaction, materials provided by entities setting out how they detect and deal with potential instances of modern slavery.

### 5. Actions taken to assess and address modern slavery risks

This is the third reporting period for Holdco. Holdco continues to focus on improving our understanding of modern slavery risks and how these risks may be present in our operations and supply chains. As part of the due diligence process, we have considered risk factors such as the industry we operate in, and the types of products and services we require to meet our customer requirements. A review of major suppliers has determined any instances of modern slavery practices occurring during the reporting period is very low risk, we have also cross referenced our major suppliers against the Modern Slavery Statements Register and considered the statements of our suppliers. Holdco has extensive policies, procedures, and practices in place, including continuous improvement and review processes, to ensure that our businesses remain legally compliant and ethical. In addition, Holdco has taken care to identify any risks to employees arising externally to its supply chain, for example where inferences of forced marriage have been made to HR we have provided advice to employees as appropriate.

We are proud of our culture and values, and our executive management team are highly engaged on a daily basis which ensures the business meets the needs and compliance of all stakeholders. We will continue to have our procedural controls and reviews in place to keep this risk low. We also consider the risk of modern slavery practices occurring in our major suppliers who are generally large companies as low, or if such risks have been identified they are being addressed, because these companies already have their own modern slavery compliance measures in place.

 <p>SOUTHERN SHORTHAUL RAILROAD</p>	<p align="center"><b>Modern Slavery Statement</b></p> <p align="center">HOLDCO HOLDINGS PTY LTD</p>	<p align="center">HR POL 004 Version No: 02 Approved By: Brent Nally</p>
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In the next reporting period Holdco will continue to focus on supplier surveys, broadening the scope of suppliers we are completing reviews on and increasing awareness throughout the business departments.

**6. Assessing the effectiveness of actions taken**

During the third reporting period, Holdco’s focus was to gain a better understanding of modern slavery risks and how such risks may be present in our operations and supply chains.

Board members and senior management representatives were provided with the link to this webinar (<https://vimeo.com/643387248/76d2e0aa87>) to increase their awareness of modern slavery impacts on those involved and on the community. The webinar provides practical insights from Australian and UK businesses to assist with compliance with modern slavery obligations. This information will continue to be utilised moving forward when making decisions on prospective suppliers and customers.

**7. Commitments for the next reporting period**

For the next reporting period, Holdco’s focus will be to:

- Improve awareness within senior and supervisory roles in modern slavery requirements. Note we consider we have achieved the goal of creating awareness.
- Review new supplier processes to include a risk assessment regarding modern slavery.
- Continue to engage our smaller suppliers and obtain data to aid in identifying modern slavery risks in their operations and supply chains.
- Continue to work on developing frameworks and processes to assess the effectiveness of the actions taken to identify and address modern slavery risks.
- Continue to ensure that any skilled labour obtained from overseas is not impacted by modern slavery.

This statement was approved by the Board of Directors.

Brent Nally  
Director – Corporate Services

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