

Austrak's Modern Slavery Statement 2023

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Introduction

This statement is the first Modern Slavery Statement for Austrak Pty Ltd (Austrak).

Our statement sets out Austrak's steps to identify and mitigate Modern Slavery in the company's operations and supply chain, in accordance with the criteria in the Australian Modern Slavery Act 2018 (the Act).

The Act was introduced to combat modern slavery through transparency and by encouraging companies to address risks in their operations and supply chain.

For the purposes of this Modern Slavery Statement, Austrak Pty Ltd detailed below is the reporting entity and referred to as Austrak.

Modern Slavery Overview

Modern Slavery describes the crimes of human trafficking, slavery, and slavery-like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.

Austrak is wholly against the exploitation of people and is passionate about reducing the risk of Modern Slavery within its supply chain and operations.

As part of a global enterprise, Austrak has a social responsibility toward its customers, employees, partners, investors and the public.

Austrak requires its employees to comply with the laws as applicable, respect basic ethical values and act in an exemplary fashion at all times. This requirement is set out in writing in the Vossloh Code of Conduct which all employees are expected to follow.

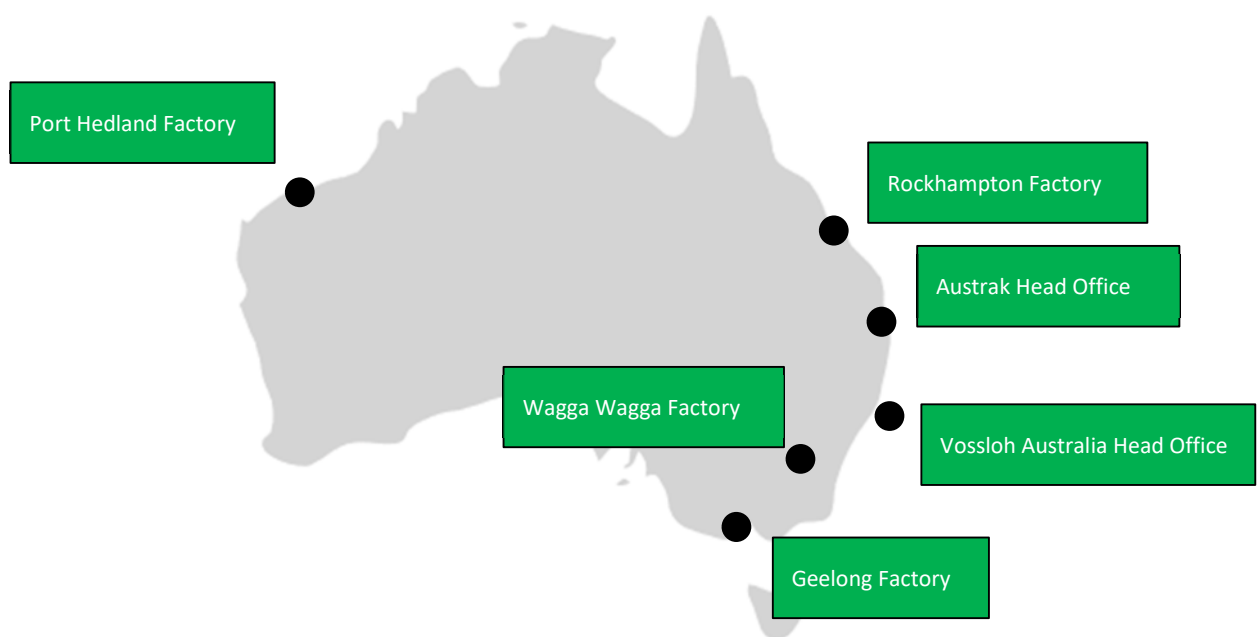
There have been no known Modern Slavery violations across Austrak in the reporting period.

Criteria One: Reporting Entities, Structure and Locations

Reporting Entities and Structure

Austrak Pty Ltd is based in Brisbane, Queensland and reports into a holding company called Vossloh Australia Pty Ltd, based in New South Wales. Vossloh Australia Pty Ltd is a subsidiary of Vossloh AG, based in Werdohl, Germany. There are a number of other business units that report into Vossloh Australia Pty Ltd which are not reporting entities for Modern Slavery purposes.

Locations



Criteria Two: Operations and Supply Chain

Operations

Austrak operates in Western Australia, Victoria, Queensland and New South Wales. Austrak considers there is a low risk of Modern Slavery practices in the company's operations in Australia but monitors this risk regularly.

The Company uses robust processes around recruitment and selection and pre-employment screening to ensure that workers have the appropriate qualifications and right to work in Australia. Written employment contracts contain terms and conditions so that employees understand their employment rights and obligations. Remuneration frameworks and procedures ensure that Austrak has oversight to make sure employees are paid an appropriate wage or salary compliant with legislation.

No high-risk activities have been identified in the most recent audit.

Supply Chain

Austrak's supply chain consists mainly of services, transport, storage and raw materials. The Company is committed to sourcing its supplies from the Australian market where possible.

If an Australian supplier is not readily available, overseas suppliers may be utilised. The overwhelming majority of Austrak suppliers are from Australia (98.20% of total supplier spend for the reporting period).

Products by Country

Country	Product
Australia	Concrete products, steel wire, Office supplies, catering supplies, transport, occupational health support, cleaning, rail cast & rail fastening components
China	Steel Wire, Sleeper moulds
Canada	BI Platform software
France	Turnouts and turnout components
Germany	Intellectual Property
India	Resin, Resin Additives
Italy	Fiberglass Panels
New Zealand	Car rental
Mexico	Sleeper components
Singapore	Sealing Strips
South Africa	Fiberglass Fabric
Switzerland	Mechanical Parts
USA	Recycled Fiberglass Waste

Criteria Three and Four: Risks and Actions taken to Assess and Address these Risks

Supply Chain

The highest identified risk for Austrak is within the supply chain, particularly in a scenario where suppliers are utilised from countries with high risk of Modern Slavery practices.

When selecting new suppliers, Austrak adopts a standardised process to gather relevant information. All suppliers must be reviewed before they can be engaged. The process has been designed to mitigate compliance risks such as Modern Slavery and corruption.

Austrak's suppliers are expected to manage and monitor their own operations and supply chains to ensure that any Modern Slavery practices are identified, and risks are managed as far as possible. Suppliers must correct any identified process deficiencies within a reasonable timeframe. Suppliers are required to notify the company if they become aware of any Modern Slavery practice in their network.

Austrak reviews its suppliers on a periodic basis and updates relevant processes in the event that the risks have changed. Austrak will continue to review and update these procedures with respect to modern slavery.

2023 Supplier Audit

A widescale audit of suppliers was undertaken in 2023. Previously, Austrak had focused on the largest suppliers. This year, the company focused on middle tier suppliers used in the last 2 years and those based overseas who had not been previously audited.

The audit received a response rate of 43%. This was a much lower response than previous audits and the company encountered some resistance to filling out the questionnaire, indicated a potential lack of understanding about Modern Slavery.

Fifty one percent of responses stated that they have trained their employees on modern slavery and what to do if they identify a potential modern slavery issue. That is a slight increase on last year's responses.

There was a reduction in the percentage of suppliers (61%) who screen prospective suppliers based on last year's audit (67%) however this year's audit focused on middle tier suppliers who tend to be smaller businesses.

The responses around how the supplier would respond to any allegation of modern slavery or substandard working conditions have remained consistent with last year's audit with all suppliers stating that they would investigate any concerns raised.

Overall, despite the response being lower than last year, the results were generally similar which is encouraging given that it was middle tier suppliers rather than the top tier suppliers.

Austrak will continue to focus on cleansing the supplier data information and will communicate with suppliers about the importance of the Modern Slavery legislation, the obligations on Austrak and on them as suppliers. Austrak is committed to highlighting the importance of engaging with Modern Slavery information requests in future and therefore intends to connect with suppliers who did not respond.

Workforce Training

Austrak's workforce training is aligned to the Vossloh *Code of Conduct*, which outlines how employees should conduct themselves at work. The training includes obligations under health, safety, wellbeing and environment, discrimination and bullying, accessibility, diversity and inclusion, human rights, anti-bribery and anti-corruption, and privacy. Employees are reminded of their *Code of Conduct* obligations during toolbox talks and via emails sent out periodically.

Temporary Workforce Engagement

Austrak's workforce are mainly full-time permanent workers, however, if there is a requirement for temporary workers, this is undertaken through pre-qualified labour hire providers. All workers are subject to competency and qualification checks prior to commencing work on site.

Whistleblowing & Raising Grievances

Austrak's Whistleblower Policy supports a process which provides confidentiality for anyone who wishes to raise concerns in good faith regarding any perceived wrongdoing, impropriety, serious unethical behaviour, legal or regulatory non-compliance or questionable accounting or audit matter and receive protection from any reprisal or detrimental action resulting from such disclosure.

Employees are trained on the Whistleblower Policy throughout the year to ensure that they are familiar with their options if they wish to raise concerns.

Whilst there have been no Modern Slavery acts in the reporting period, any reports would be fully investigated. Employees are also able to raise grievances under a number of different instruments across Austrak, including grievance standards and procedures, enterprise agreements and awards.

Policy Framework

The Austrak policy framework consists of:

- *Code of Conduct* for Employees – a global code that all employees must adhere to;
- *Harmonious Workplace* Policy – designed to ensure that all employees are treated with dignity and respect;
- *Supply Chain* Policy – requires all suppliers to comply with all current legislation and guidelines in respect of Anti Bribery, Corruption and Modern Slavery;
- *Vossloh Group Global Responsible Sourcing Guideline* –which aims to embed the protection of the environment and natural resources, human rights, labour standards, as well as being a law-abiding participant in the global market; and
- *Whistleblower* Policy – to encourage employees and stakeholders to report any perceived wrongdoing, impropriety, serious unethical behaviour, legal or regulatory non-compliance or questionable accounting or audit matter.

Criteria Five: Effectiveness of Actions

Austrak considers that our understanding of Modern Slavery risks throughout our Operations and Supply Chain has developed since the introduction of the *Modern Slavery Act 2018 (Cth)*. Our framework around the Modern Slavery statements have been an opportunity to review the measures that we have put in place and although no high-risk Modern Slavery risks have been identified as through our grievance mechanisms or audits, we believe that continued education for our employees and suppliers will be key to improving the effectiveness of these measures.

Criteria Six: Consultation

Austrak does not own or control any other entities and therefore is submitting this statement as a standalone statement.

Criteria Seven: Any other relevant information

Plans going forward

We will focus on ensuring that our supplier data is accurate, training our workforce to understand the risks of modern slavery and ensuring our suppliers comply with the supplier code of conduct.

We will continue to communicate with suppliers to highlight the importance of understanding Modern Slavery risks within our business networks. We will continue to assess our Company practices against the requirements of the *Modern Slavery Act 2018 (Cth)*.

This statement was approved by the Board of Austrak Pty Ltd in their capacity as principal body of Austrak Pty Ltd on 24 June 2026.



Murray Adams
Director
Austrak Pty Ltd



Boris Rozentoul
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