

# **Bowen Rail Company Pty Ltd Modern Slavery Statement**

Reporting year ended 31<sup>st</sup> March 2024

---

## 1. Introduction

This Modern Slavery statement is for Bowen Rail Company Pty Ltd A.C.N. 638 074 889 (referred to as “**Bowen Rail**”), which is a reporting entity under the *Modern Slavery Act 2018*(Cth) (the ‘**Act**’). Bowen Rail is an Australian business and part of the global **Adani Group**. Bowen Rail is committed to combating the risk of modern slavery in our supply chains and in any part of our business.

Bowen Rail is committed to:

- Operating its business in accordance with the Modern Slavery Act 2018 (Cth).
- Ensuring our people understand modern slavery and the risk it presents to our operations.
- Providing our people with appropriate avenues for reporting potential instances of modern slavery within our operations, or the operations of our suppliers and/or clients.
- Mitigating modern slavery risk within our operations.
- Eliminating potential and/or actual modern slavery practices from our operations and supply chain
- Ensuring appropriate transparency with our people, clients, suppliers, and stakeholders regarding the maturity of our modern slavery due diligence process and the findings arising from this.
- Enhancing our plan for measuring the effectiveness of our existing modern slavery risk framework.

This Modern Slavery statement is prepared in accordance with the Act and describes the risks of Modern Slavery within the Bowen Rail business and does not extend to any other Adani Group entities. It outlines the steps we have taken, and the next steps to be completed during the financial year (ending 31 March 2024) to identify, manage and mitigate the risks in our operations and supply chains.

For the purposes of this statement, references to ‘**we**’, ‘**us**’ and ‘**our**’ collectively refer to Bowen Rail and its reporting entity covered by the statement.

## 2. Modern Slavery Law

The Act identifies seven (7) relevant mandatory criteria (**Mandatory Reporting Criteria**) that the Bowen Rail Modern Slavery statement must address, as follows:

- a) identify the reporting entity;
  - b) describe the reporting entity’s structure, operations and supply chains;
  - c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity;
  - d) describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes;
  - e) describe how the reporting entity assesses the effectiveness of these actions;
  - f) describe the process of consultation with any entities that the reporting entity owns or controls: and
  - g) any other information the reporting entity considers relevant.
-

### 3. Mandatory Reporting Criteria

#### 3.1. Identity of reporting entity

This is the Modern Slavery statement for Bowen Rail Company Pty Ltd A.C.N. 638 074 889, an Australian proprietary company, registered in Queensland, and with its registered office at Level 9, 120 Edward Street, Brisbane Queensland 4000.

#### 3.2. Describe the reporting entity's structure, operations and supply chains

##### Structure

Bowen Rail is wholly owned by Bowen Rail Operation Pte Ltd (a proprietary company registered in Singapore) and is part of the **Adani Group** of diversified Australian businesses (known as “**Bravus**”) delivering integrated energy and infrastructure services. Bravus has been in Australia for more than a decade, bringing investment, new ways of operating, and working with communities since 2010.

##### Operations

Bowen Rail undertakes the above rail maintenance of the Rollingstock and operates the Rollingstock on the purpose-built Carmichael Rail Network (**CRN**) infrastructure of approx. 200 KM commencing from the Carmichael Mine, an open-cut thermal coal mine in the Galilee Basin, to a third party network for further transportation of the mined coal to North Queensland Coal Export Terminal (**NQXT**).

Bowen Rail has the resources to undertake the logistics and deliver the approx. 10 million tonnes of coal, each year, from Galilee basin's Carmichael Mine to the export market customers.

Bowen Rail adheres to strict environmental approvals for its operations across regional Queensland. These approvals require us to monitor and manage groundwater and water systems, maintain management plans for specific species, and conduct environmental research.

Bowen Rail is proudly local, supporting regional communities and businesses to grow sustainably. We have a focus on local jobs and procurement, ensuring we make a positive contribution to the communities in which we operate and we work in partnership with Traditional Owners to ensure we respect the rights, history, future intentions, and requests of First Australians.

##### Supply chains

We are a local rail logistics & freight company, with employees living across Queensland but operating from our bases in Brisbane, Bowen, Rockhampton, Townville, and at the Carmichael mine. We facilitate the logistics of minerals essential to human progress and development, and by doing so efficiently and effectively, we aim to deliver superior returns to our shareholders while safeguarding the environment and meeting our wider obligations to society.

Our website ([www.bowenrail.com.au](http://www.bowenrail.com.au)) provides more detailed information about our business, including our strategy, philosophy, and operations, as well as our approach to sustainability. Bowen Rail along with the Rail infrastructure entity being CRNT and the below Rail Maintenance entity being CROT, have collectively engaged

---

with approximately 450+ suppliers so far, primarily located within Australia. Our commercial and legal teams support Operations in managing our suppliers.

Bowen Rail continues to enhance its processes and implement new processes aimed at ensuring that we only work with appropriate suppliers who can meet the standards that we expect. Most of our direct, large value suppliers are Australian entities.

Over 90% of annual spend is from our direct suppliers and contractors based within Australia, the remaining balance is potentially from the USA/China for the reasons attributable to specialised equipment and/or parts.

As part of our commitment to local procurement, where needed, we provide prospective suppliers with technical support to help them meet our procurement standards.

### **3.3. Risks of modern slavery practices in the operations and supply chains of the reporting entity**

Given the majority of Bowen Rail's suppliers operate within Australia, the geographical risk is assessed as low regarding modern slavery considering that all such contractors and/or suppliers are obliged to comply with the legislative requirements.

However, within our more narrow supply chain, we note that some overseas markets may, due to lack of visibility, have increase risk of modern slavery at secondary supply-chain levels. Thereby, we have initiated the discussions and are incorporating contractual provisions with such overseas suppliers to minimize modern slavery risks, if any.

### **3.4. Actions taken by the reporting entity to assess and address the above risks, including due diligence and remediation processes**

#### **Supply Chain Due Diligence**

Bowen Rail has finalised the development of a Supplier Modern Slavery Questionnaire, which will be sent to our primary suppliers.

The purpose of this Supplier Modern Slavery Questionnaire is to ensure all our major business partners and supply chain stakeholders are aware of their own responsibilities and those of Bowen Rail with respect to managing the risk of modern slavery in the supply chain and to elicit information that Bowen Rail will use to ensure compliance and assess modern slavery risks in its supply chain.

This questionnaire will be reviewed by our internal stakeholders including Commercial to ensure we understand our exposure and mitigate the Modern Slavery Risk in our Supply Chain.

#### **Modern Slavery Awareness Guide**

Bowen Rail is committed to ensuring that our people and suppliers understand what Modern Slavery is and the key role they play in delivering on our commitments.

To support the education of our employees, a guide will be created to provide an overview of local and global modern slavery trends in related industries and the types of risks our business should be considering. The guide will also provide a tailored view of the legislation applicable to Bowen Rail, how we deliver on our commitment to the underlying principles, and outline the key commitments in our reporting.

#### **Supply chain management and supplier on-boarding processes**

Bowen Rail has commenced a review of its Standard Purchase Contract and Standard Service Contract (General Terms and Conditions) with a view to refining templates in relation the Modern Slavery Compliance Obligations for our direct suppliers and sub-suppliers. This review, while something that will always be evolving, has

---

progressed, and the standard suite contracts now include modern slavery compliance clauses that obligate the counterparty to take reasonable actions and measures to identify, assess and address the risk of modern slavery practices in the operation's supply chains used in connection with Goods or Services the subject of the contract.

In the event the Supplier or Contractor becomes aware of any such practices, that party must take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities in its supply chains.

### **Remediation: Grievances and complaints**

Bowen Rail has a Whistleblowing Policy in place with the reporting route available for both internal and external reports to raise concerns about compliance obligations, corporate governance, bullying and harassment, including any complaint or concern regarding our Modern Slavery Obligations.

The Board and senior management encourage everyone who works with Bowen Rail to speak up and report any conduct they believe to be inappropriate. We are committed to ensuring that individuals who disclose can do so safely, securely and with confidence that they will be protected and supported.

Our dedicated Whistleblowing Hotline is one of those formal channels. This service is available to any individual who is, or has been a director, employee, secondee, contractor, consultant, supplier, the service provider (or their employee or subcontractor), associates of Bowen Rail and relatives, spouses, dependents of these individuals.

The Whistleblowing Policy is regularly reviewed and updated to ensure an effective and transparent grievance process and compliance with relevant laws.

### **Policies and Guideline**

Bowen Rail takes guidance from the Adani Group policies and code of conduct (the Guidelines). Adani Group policies require the entities and its people to conduct business in a manner that respects human rights; employees and contractors treat each other with dignity, respect, and consideration at all times and do not involve modern slavery practices.

All procurement engagements for the business are required to demonstrate that the spending of the company funds is justified, is done so in accordance with the Guidelines, achieves the best value and is fit for purpose.

The Guidelines also prohibit discrimination, based on any protected attribute under the law. Our Employees and Contractors are required to understand and adhere to the Guidelines throughout their employment or engagement.

The objective of the Guidelines is to ensure that the procurement of all goods and services is conducted in an honest, competitive, full, fair, reasonable, transparent, and ethical manner.

### **3.5. How the reporting entity assesses the effectiveness of the above actions**

To date, Bowen Rail has not become aware of any occurrences where a supplier has engaged in practices in breach of their modern slavery obligations.

Notwithstanding the above, in order to assess the effectiveness of its actions, Bowen Rail shall conduct reviews on the following areas:

- Procurement & supply chain;
    - review of percentage of contracts which include modern slavery clauses; and
    - review of percentage of major suppliers completing the modern slavery questionnaire.
  
  - Grievances and reporting:
-

- review of number of modern slavery cases identified and remediated.
- Regular review of Bowen Rail's obligations to ensure that Modern Slavery processes are being complied with.

Further to the above, Bowen Rail undertakes a continual process of improving the way it distributes information, and implements training, to key staff involved in the procurement and engagement of contractors, consultants, and suppliers in order to ensure such staff are aware of the measures that are currently in place, and those that are to be implemented.

Bowen Rail is committed, and continues, to develop processes to assess the effectiveness of the actions taken by it and our suppliers to respond to modern slavery risks with respect to supply chains and operations.

### **3.6. The process of consultation with any entities that the reporting entity owns or controls**

Bowen Rail consulted with the key leadership team members in preparing this Modern Slavery statement and circulated a draft of this statement for review and comment, prior to it being put to the Board of Directors for final review and approval.

### **3.7. Any other relevant information**

Bowen Rail is continuing to develop and implement an improved framework to assess and monitor the Modern Slavery risks in our operations and supply chain.

Bowen Rail recognises that the risks of modern slavery are complex and evolving. We will continue to work to identify and address these risks in our business and engage with a range of stakeholders, to assess the effectiveness of our actions and enhance our approach.

## **4. Reporting Entity Board Approval**

This Modern Slavery statement was approved by the Board of Directors of Bowen Rail on 8 November 2024.

## **5. Reporting Entity Signature of Responsible Member**



Samir Vora  
Director