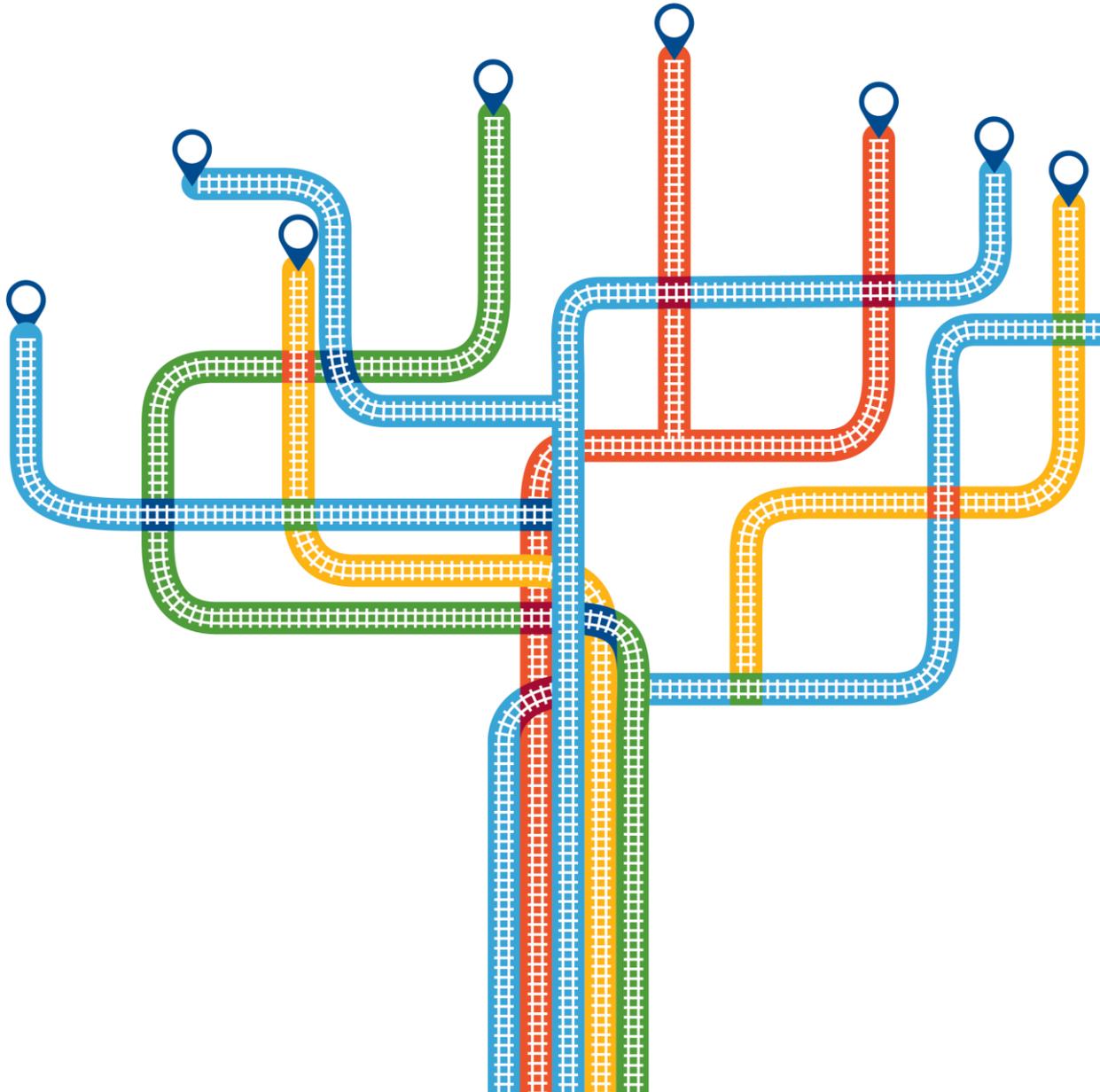


# Modern Slavery Statement

FY2025



# Acknowledgement of Country

We acknowledge the Traditional Custodians of the land on which we work, live and rail. We pay respect to Elders past, present and future and to the continuation of cultural, spiritual, and educational practices of all Aboriginal and Torres Strait Islander peoples.



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## About this statement

This Modern Slavery Statement has been prepared by Pacific National in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (the Act) for the financial year ending 30 June 2025 (FY25). This Modern Slavery Statement (statement) responds to Section 16 of the Act. It identifies and reports on the modern slavery risks present in Pacific National's operations and supply chains, the actions taken to manage them, the effectiveness of those actions, and future measures to address the risks.

This statement has been approved by Pacific National's Board of Directors on the recommendation of the Chief Executive Officer, and it is published with its endorsement.

## Reporting Entities and Structure

This is a joint statement made by Australian Logistics Acquisition Holdings Pty Ltd (ABN 28 611 628 909) on behalf of its subsidiary entities listed in Appendix A. In this statement unless otherwise stated, these entities are referred to as "Pacific National", "we", "us", and "our". Any reference in this statement to a "year" relates to the financial year ended 30 June 2025.

## Consultation with Entities

This joint statement has been prepared in consultation with, and approved by, the governing body of the reporting entities.

Pacific National operates as an integrated group and governance, policies, and procedures are the same across all entities in the group structure. A central Board of Directors (the Board) and Executive Leadership Team provide strategic guidance, governance, and risk management for all entities owned or controlled by Australian Logistics Acquisition Holdings Pty Ltd.

During the reporting period, the Social and Governance steering committee actively engaged and consulted with Pacific National's Leadership Team covering all entities included in this statement. Matters consulted on included an employee modern slavery awareness and training module.

This statement has been approved by the Board of Directors as the principal governing body of Australian Logistics Acquisition Holdings Pty Ltd for each of the reporting entities listed in Appendix A.

This statement has been signed by Brett Grehan, Chief Executive Officer.

## CEO Commitment

Pacific National is focused on fostering a safe, respectful, and productive working environment for our people, customers, and our stakeholders. This responsibility extends to preventing modern slavery, exploitation, and human trafficking from our direct and indirect supply chain.

This is Pacific National's sixth Modern Slavery Statement, the first since my appointment as Chief Executive Officer in November 2024. It outlines our efforts to assess and monitor risks of modern slavery in our supply chain and implement appropriate mitigating actions to safeguard our workforce.

Our company strategy articulates how we are focused on safety, delivering excellent customer service, maintaining productivity, profitable growth, and a great working environment for our people and communities. Ethical business conduct, integrity, and transparency are key to delivering our strategy. Our governance structure, processes, and policy framework allow us to maintain high standards of corporate governance to mitigate risks of modern slavery in our operations and supply chain.

We are clear on the conduct and behaviours we expect of our workforce and have implemented policies that enable our employees to speak up against any misconduct. This expectation and approach is extended to our suppliers.

This year, we recognised that that Pacific National needs to build internal capability to better manage modern slavery risks within our operations and supply chain. We launched a new Modern Slavery Awareness eLearning module to all our employees. The training package provides education on key modern slavery matters, from definitions to identifying warning signs; the risks and legislative obligations under the Modern Slavery Act; and our approach to human rights management.

We are also implementing our first Indigenous Procurement Strategy which was launched last year. As part of the strategy, we have become a member of Supply Nation, Australia's largest national listing of verified Aboriginal and Torres Strait Islander businesses. The platform will enable us to connect and engage with more than 5,000 certified and registered enterprises.

I am pleased to see the progress we have made to manage risks of modern slavery within our business. The Pacific National team will continue this work to deliver a robust modern slavery program.



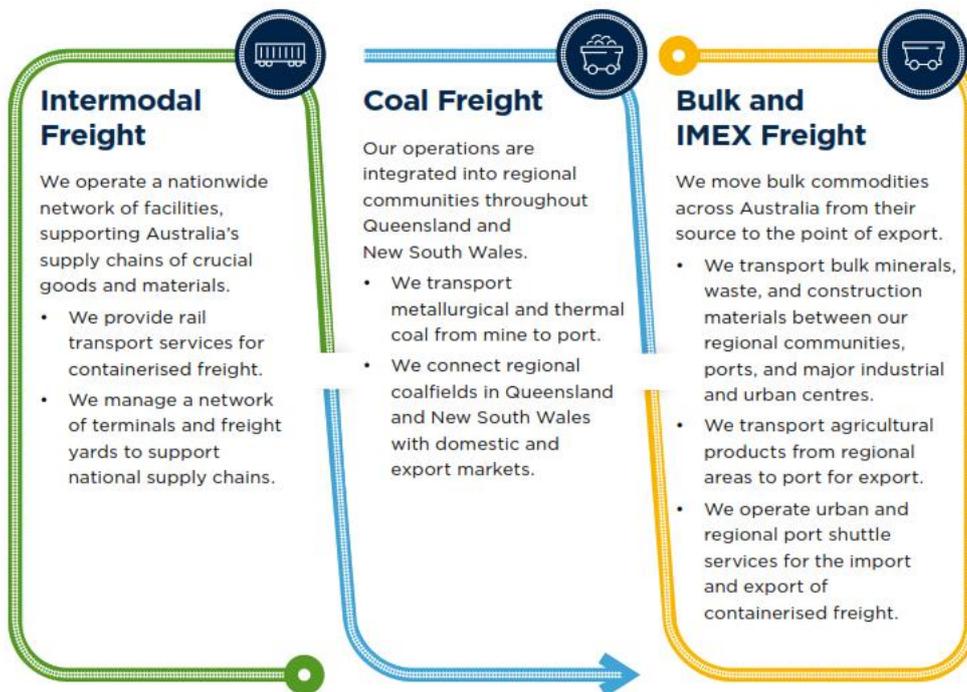
Brett Grehan  
Chief Executive Officer  
Pacific National

## About Pacific National

Pacific National is Australia’s largest private rail freight operator. Our vision is to be Australia’s most trusted and respected logistics partner.

We have a broad customer base, servicing energy and resources, fast moving consumer goods, freight-forwarding, industrial manufacturing, and agricultural companies across a mix of general freight cargo, import and export goods, and bulk commodities.

Since the first train ran in New South Wales in 1855, our operations are round-the-clock, every day of the year, to deliver what matters.



## Our PNA

The Pacific National Approach (PNA) – our guiding principles – highlights the values fundamental to our commitment to responsible, transparent business practices – and to our approach to modern slavery. Our PNA reinforces Pacific National’s continuing responsibility to the protection of human rights, reflects our prioritisation to the safety of all people above all else, and running our operations in an economically, socially, and ethically responsible way.

**pacificnational** THE PACIFIC NATIONAL APPROACH



**OUR PURPOSE** We deliver what matters.  
For our people, customers, and shareholders.

**OUR PHILOSOPHY** We care more

**OUR VISION** Australia's most trusted and respected logistics partner

**OUR PRIORITIES**

<p><b>Safety</b> Safely Every Day</p>	<p><b>Service</b> Delivering superior value for our customers</p>	<p><b>Productivity</b> Driving efficiency and getting our assets working</p>	<p><b>Profitable Growth</b> Winning in a competitive market</p>	<p><b>People and Community</b> Inspiring our people and investing in our future</p>
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**OUR VALUES**

<p><b>Make It Simple</b> We reduce complexity.</p>	<p><b>Share More</b> We create a learning environment through storytelling and embrace and share diverse experiences.</p>	<p><b>Kindness</b> We are thoughtful and show respect in all circumstances.</p>	<p><b>Gratitude</b> We show appreciation and express our thanks.</p>	<p><b>Curiosity</b> We embrace curiosity at all levels to benefit the safety, wellbeing, and continuous improvement of our workplace.</p>	<p><b>Own It</b> We take responsibility, we take action, we own our successes and our mistakes.</p>
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**OUR FOUNDATIONS** Footprints and Assets | Heritage | Operational Excellence

## Our Operations

**Our company snapshot\***

- Active Locos\* ~533
- Active Wagons ~10,986
- FTE Employees >3,000
- Customers ~483
- Weekly Revenue Train Services ~693

Average weekly haulage FY25

Coal: 2.26m tonnes

Bulk and other Freight: 0.28m tonnes

Intermodal: 0.16m tonnes

12,518 TEU\*\*

**Our core markets\***

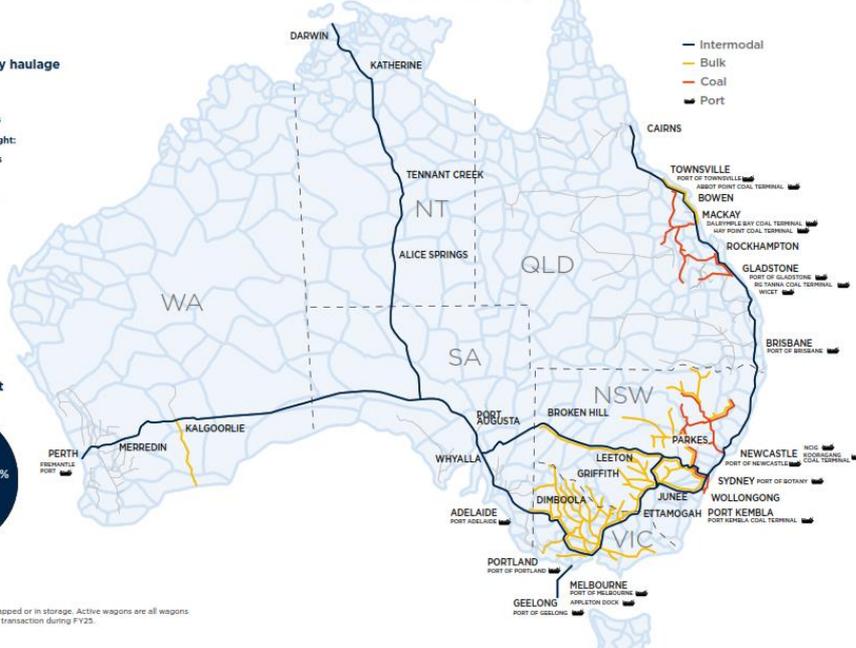
Percentage of rail revenue by business segment



\* Active locomotives are all locomotives excluding those that are on hire, scrapped or in storage. Active wagons are all wagons excluding those scrapped or in storage. Customers are all customers with a transaction during FY25.  
\*\* TEU - Twenty Foot Equivalent Unit  
\* Core markets numbers are rounded to the nearest one per cent

**Where we operate**

PN Network overlaid on First Nations map of Australia



## Our Workforce

Pacific National employees oversee and implement strategy, operations and service delivery, property and finance, people & culture, legal, and logistics activities. We employ 4,069<sup>1</sup> people across 70 sites in Australia. Most of our workforce, excluding contingent workers, is in regional areas (59 percent), with the rest located across Sydney, Melbourne, Brisbane, Adelaide, and Perth (41 percent). Around 78 percent of our workforce is engaged through permanent contracts, 3 percent through fixed-term contracts, while casual employees represent around 1 percent of our workforce. We also employ contingent workers through third-party agencies. Almost three quarters of our workforce is covered by collective bargaining agreements.

We provide our people with a safe workplace. We encourage a culture where people feel safe sharing concerns, reporting misconduct, and addressing potential ethical and legal violations. Our Speak Up procedure sets out avenues for resolving work-related issues so that we can take action and promote our people's health and well-being in all locations across Australia. This procedure is not limited to the workplace or specific working hours. Off-site activities, out of work interactions and work functions, social media and online interactions, all fit under the scope of the procedure.

Our workforce performs a wide variety of tasks, with most of our people engaged in train and terminal operations, including train-driving, operations, engineering and supervisory-related roles. We also have people employed in office-based roles in corporate functions such as risk management, finance, strategy, environment health and safety, people and culture, legal, commercial and customer service, communications, procurement, and sustainability.

All employees are engaged in Australia under local employment laws. Recruitment is managed by our People and Culture team with external recruiters used where required. All recruitment and onboarding is overseen by the Pacific National People and Culture team in compliance with our Code of Conduct and Respect at Pacific National Policy. A detailed breakdown of our workforce can be found in our 2025 Sustainability Report in the Performance Data section on pages 64-66.

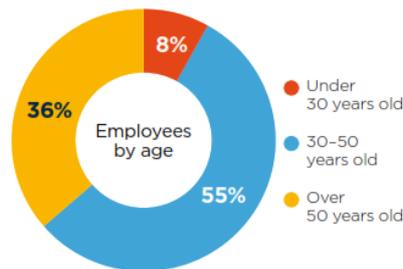
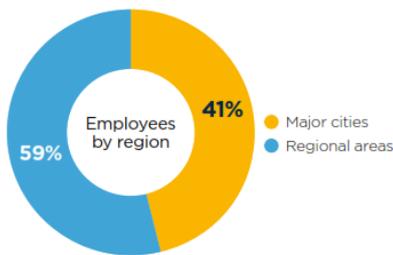
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<sup>1</sup> Includes Pacific National permanent, fixed-term contract, casual works and contingent workers.

A summary of the most relevant data is provided in Table 1.

**Table 1. Pacific National FY25 workforce profile**

FY25 Workforce Profile	
Total employees	4069 <sup>2</sup>
Permanent contract	3160
Fixed-term contract	110
Casual	53
Contingent workers	746 <sup>3</sup>
Percentage of employees covered by collective bargaining agreements	75% <sup>4</sup>



## Our Supply Chain

Pacific National procures various services and goods not for resale including operating equipment, access to infrastructure, and energy for our operations. During the reporting year, Pacific National’s supplier spend was approximately \$1.55 billion across 1415 suppliers.

Primary suppliers	Secondary suppliers
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Primary suppliers are those we engage with directly. Our team procures goods and services that are essential to our operations, including fuel, access to infrastructure, and rollingstock.

Secondary suppliers are those who trade with or provide materials or services or subcontract to our primary suppliers. This includes manufacturing plants and sourcing of raw materials, who may potentially be located overseas.

<sup>2</sup> Includes Pacific National permanent, fixed-term contract, casual works and contingent workers.

<sup>3</sup> Employees engaged with Pacific National via third-party agency.

<sup>4</sup> Percentage of employees engaged through Enterprise Agreements out of the total Pacific National workforce, excluding contingent workers.

**Table 2. Pacific National FY25 supplier profile**

Total Procurement Spend	~\$1.55bn
Primary suppliers	1415
Top 50 primary suppliers based on spend	85%
Spend on suppliers in regional areas	~\$38 million
Australian suppliers based on spend	99%
International suppliers based on spend	1%
Number of suppliers registered in Procurement risk management system (Avetta)	530
Top 50 Suppliers based on spend - number of suppliers assessed as high risk	5
Top 50 Suppliers based on spend - number of suppliers assessed as medium risk	20
Top 50 Suppliers based on spend - number of suppliers assessed as low risk	25

Australia-based suppliers account for 99 percent of our primary suppliers, with one percent of our supply chain based overseas. Based on the number of suppliers, the percentage of overseas suppliers for our rollingstock procurement is 2 percent, Information Technology (IT) and communications spend is 14 percent and miscellaneous spend is 3 percent (as outlined in Table 3). For categories of fuel, access to rail, labour hire, cleaning and accommodation, and PPE and safety equipment, all our primary suppliers are based in Australia. 78 percent of our total procurement spend is in the categories of fuel, access to rail networks, and rollingstock. We engage 166 suppliers for procurement of these goods and services.

We have identified five suppliers from our “Top 50 Suppliers based on spend” as being high risk. These suppliers were profiled as high risk primarily based on their operating locations and industry type. We recognise that some of our primary suppliers have manufacturing locations or are headquartered in countries associated with a higher risk of modern slavery practices, including China.<sup>5</sup> We are also at risk of indirect association with modern slavery practices in instances where inputs into goods we purchase were sourced in high-risk countries. This relates to goods such as uniforms, PPE, rollingstock parts, IT and communications and fuel.

We continue to evolve our procurement processes to improve our understanding of our supply chain, manage the instance of modern slavery risk in that supply chain and are guided by our internal procurement policies and procedures.

<sup>5</sup> According to the Global Slavery Index prevalence and vulnerability indices – [www.globalslaveryindex.org](http://www.globalslaveryindex.org), suppliers that manufacture in countries associated with a higher risk of modern slavery specifically include China.

**Table 3. Procurement category percentage spend**

Category	Percentage of total spend	Number of suppliers	Percentage of Australia-based suppliers	Percentage of overseas suppliers
Fuel	25.8	6	100	0
Access	23.7	21	100	0
Rollingstock	29.0	139	98	2
Labour hire (train crew and non-crew)	5.2	81	100	0
IT and communications	3.0	81	86	14
Cleaning/accommodation	1.5	81	100	0
PPE and safety equipment	0.1	4	100	0
Other (miscellaneous spend)	11.7	982	97	3

## Local and First Nations Procurement

Our team aims to engage regional suppliers in Australia to support local communities wherever we can. Several of our top suppliers are based in Georgetown, Dubbo, Nebo, Broken Hill, and East Bendigo<sup>6</sup> supplying:

- Wagon maintenance and freight services for our rollingstock.
- Building Construction and operational consumables for our Infrastructure.
- IT Consultants and IT Communications.

Based on supplier head office locations, Pacific National's FY25 regional supplier spend is approximately \$38 million. Additionally, \$367 million, 23.7% of total Procurement spend, is for access charges paid to rail infrastructure providers, with head office locations based in metropolitan areas but operating largely across regional areas.

Our procurement team recently developed Pacific National's first Indigenous Procurement Strategy to diversify our supply base. In FY25, Pacific National joined as a member of Supply Nation which will enable us to connect and engage with First Nations owned businesses. Where there are suitable options, Pacific National is committed to including First Nations suppliers in all external tenders.

## Our Rollingstock

Rollingstock is a critical asset for Pacific National, essential to effective operations and characterised by long asset lifecycles. In FY25, 29% of our total supplier spend was directed towards rollingstock. Our new 94 Class locomotives are being assembled in Australia, with major components such as engines and traction motors sourced from the United States and smaller components from New Zealand and Germany. Pacific National's most recent wagon purchases were from a Chinese company with manufacturing completed in China. A large portion of structural steel used to manufacture our rollingstock is sourced from China.

As per our Procurement Framework and due diligence processes, we continue to engage with our primary rollingstock suppliers to better understand their processes for management of modern slavery risks. Such engagement includes the use of supplier screening tools and utilisation of a suite of template commercial head contracts.

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<sup>6</sup> Supplier locations are based on their principal place of business.

## Modern Slavery Governance

### Our Governance Structure

Pacific National’s governance structure is designed to promote ethical and responsible business conduct, with clear lines of accountability and reporting.

It is a critical pillar that allows us to achieve our objectives, including mitigation of risks associated with modern slavery.

The Board provides the highest level of oversight and has adopted corporate governance policies and procedures that define the way Pacific National conducts business. The Board and its committees provide governance and direction over Sustainability Strategy, risks, metrics, and sustainability-related incentives, including modern slavery risk management.

### Modern Slavery governance at Pacific National

Board of Directors	Reviews and approves the Modern Slavery Statement
Board Audit and Risk Committee	Considers modern slavery risks and recommends approval of the statement to the Board
Executive Leadership Team (ELT)	Manages modern slavery risks in day-to-day operations .The CEO endorses the Modern Slavery Statement
Social and Governance Steering Committee	Ensures governance , oversight of modern slavery risks and compliance against progress on related action items.
Risk and Resilience Team	Responsible for the Pacific National’s overall risk management framework and its implementation , governance and reporting
Procurement Team	Responsible for supplier selection, management and modern slavery risk evaluation in accordance with Procurement Framework and Supplier Code of Conduct
Sustainability Team	Prepares the annual Modern Slavery Statement and coordinates the development and completion of Modern Slavery related action items
People & Culture Team	Manages recruitment , employment, training and ensures that fair work practices are employed across our operations
Business Units	Day-to-day management of modern slavery risks in accordance with Pacific National’s risk management practices and policies

### Our Policy Framework

Our policy framework guides ethical conduct at Pacific National. It sets the foundation for our approach to management of modern slavery risks in our operations and supply chain.

In FY25, we refreshed our Risk Management Framework. The Risk Management Framework is aligned to ISO 31000:2018 and provides our business with tools and guidelines to more effectively manage risk, including Modern Slavery. The Risk Management Framework and additional policy details are provided below.

### Pacific National Risk Management Framework



### Pacific National Policies Relevant to Modern Slavery

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at Pacific National during the reporting period
<b>Code of Conduct</b>	Sets the standard of behaviour we expect of all who work with us, including employees, officers, directors, contractors, and suppliers. It embodies our commitment to good corporate governance and responsible business practices, including rejecting all forms of slavery.	All Pacific National employees receive training on their obligations under the Code of Conduct and are required to comply with it as part of their terms of employment at Pacific National.  As of 30 June 2025, 88 per cent of employees (including third party contractors) had completed the training.
<b>Supplier Code of Conduct</b>	Applies to all our suppliers and is aligned with our Code of Conduct. The Supplier Code of Conduct reflects the expectations of our people, customers, investors, regulators, and the community.	All suppliers to Pacific National are required to review and follow with the Supplier Code of Conduct.

<p><b>Risk Management Framework and Policy</b></p>	<p>Guides our risk management approach and includes guidelines and tools to manage risk effectively throughout our organisation.</p>	<p>The purpose of this policy and framework is to articulate the approach for an enterprise-wide risk management system at Pacific National.</p>
<p><b>Whistleblower Policy</b></p>	<p>Encourages and enables eligible whistleblowers to confidentially raise concerns, protects eligible whistleblowers for raising such concerns and provides transparency regarding how reported concerns are received and, where appropriate, investigated by Pacific National.</p> <p>The Whistleblower Policy is supplemented by our Respect at PN Policy and our Speak Up Procedure.</p>	<p>Directors, Executive and senior leaders receive training on the process for handling whistleblower complaints.</p> <p>We had a total of 34 disclosures in FY25, 23 of these disclosures were considered ‘protected disclosures’ in line with Pacific National’s Whistleblower Policy and the legislation.</p> <p>None of these disclosures were related to modern slavery.</p>
<p><b>Procurement Framework</b></p>	<p>Our Procurement Framework includes standardised procurement processes, including several risk mitigation tasks across sourcing, supplier risk assessment, tender response evaluation on contract management procurement stages. It encompasses modern slavery-specific risk mitigation practices, such as supplier questionnaires, and ongoing risk monitoring.</p>	<p>Procurement activities abide with the Procurement Framework which includes modern slavery assessments and requirements as part of the evaluation before supplier selection.</p>
<p><b>Indigenous Procurement Strategy</b></p>	<p>Our Indigenous Procurement Strategy includes our approach to increasing engagement with First Nations suppliers in our procurement activities.</p>	<p>In FY25, Pacific National joined as a member of Supply Nation which will enable us to connect and engage with First Nations owned businesses.</p>
<p><b>Request for Information and Purchase Order Terms and Conditions</b></p>	<p>The Request for Information and Purchase Order Terms and Conditions set out rules of engagement with our vendors and suppliers, including management of modern slavery risks.</p>	<p>Request for Information terms and conditions issued to vendors include provisions around Modern Slavery and adherence to our Supplier Code of Conduct.</p> <p>Our Purchase Order terms and conditions include modern slavery-related and anti-corruption clauses applicable to both our company and our suppliers.</p>

## Complaints and Grievance Mechanism Overview

Having a culture of speaking up is essential in fostering our Pacific National Approach ('PNA'), values and "care more" philosophy. We want our people to feel safe sharing concerns, reporting misconduct, and addressing potential ethical violations including any potential Modern Slavery events.

Pacific National's Whistleblower Policy enables our employees to raise workplace-related concerns and provides transparency regarding how reported concerns are received and, where appropriate, investigated by Pacific National. The Whistleblower Policy is supplemented by our Respect at PN policy and our Speak Up Procedure.

Our Speak Up Procedure outlines how employees can raise concerns related to our workplace and sets out avenues for resolving work-related issues. Employees are encouraged to raise concerns promptly to help identify and address issues. The Procedure applies to all employees, officers and directors, and any contractors and consultants who perform work for Pacific National. It also reflects the expectations of our customers, suppliers, shareholders, and the community.

Our Respect at PN Policy affirms our commitment to a safe, inclusive, and respectful workplace where all individuals are valued and supported. It sets clear standards of behaviour for employees, leaders, contractors, and consultants, and reflects the expectations of our customers, suppliers, investors, and the wider community.

Our People & Culture representatives provide support and guidance to leaders in handling inappropriate conduct or grievances effectively. If our employees or partners are not comfortable reporting through the recommended channels, they can contact our external confidential hotline (STOPline).

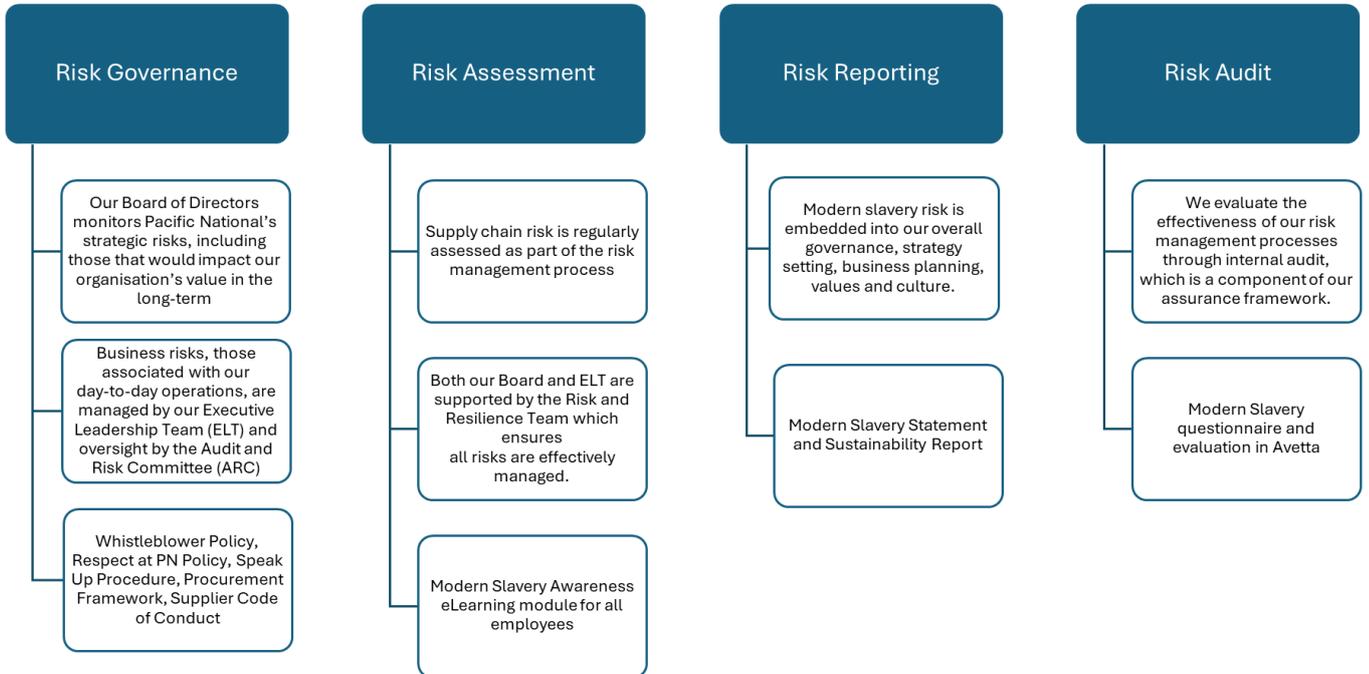
We assess modern slavery risk in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs) to align with the global best practice. Our response to the UNGPs 31 effectiveness criteria for non-judicial grievance mechanisms is included below.

Effectiveness criteria	Pacific National's response
<p><b>a. Legitimate</b></p>	<p>Our Code of Conduct, Whistleblower Policy, Respect at PN, and Speak Up Procedure provide an overview of grievance mechanisms, including steps to make a complaint and policies on safeguarding against retaliation.</p> <p>They are approved by the Pacific National Board and the ELT as per the Board policy map.</p> <p>For potential or suspected breaches of the law, regulations, obligations or if our employees and partners do not feel comfortable reporting through the Pacific National recommended channels, they can contact an external confidential hotline (STOPline).</p>
<p><b>b. Accessible</b></p>	<p>Our Whistleblower Policy, Respect at PN and Speak Up Procedures are promoted through internal communication and learning platforms and our website.</p> <p>Access to all grievance mechanisms is free.</p> <p>All employees are informed about grievance options and procedures at induction and onboarding, through mandatory training and internal workplace communication platforms.</p>

<p><b>c. Predictable</b></p>	<p>Our Whistleblower Policy, Respect at PN and Speak Up Procedures provide standardised, repeatable and proven processes for complaints and grievances, promoted by our Executive Team and implemented across our operations.</p> <p>Ethical procurement practices and responsible sourcing, including modern slavery considerations, have been incorporated into Pacific National’s ESG program since FY22 and their performance is monitored through the delivery of our ESG strategy.</p>
<p><b>d. Equitable</b></p>	<p>Our complaints and grievance mechanisms are easily accessible, confidential, and free. We also offer access to an external support hotline (STOP line).</p>
<p><b>e. Transparent</b></p>	<p>Our grievance mechanisms are clearly outlined in our policies and procedures which are available to our employees and partners through our internal ‘LearningHUB’ platform and through our public website. We publish information on whistleblower complaints in our annual Modern Slavery Statement.</p>
<p><b>f. Rights-compatible</b></p>	<p>Our policies and procedures are aligned with a range of Australian legislation, codes, and standards, including the Corporations Act 2001 (Cth), Fair Work Act 2009 (Cth), Australian Human Rights Commission Act 1986 (Cth), and Racial Discrimination Act 1975 (Cth). They are designed to be gender-sensitive and culturally appropriate, ensuring they do not contribute to harm and are consistent with human rights–based outcomes.</p>
<p><b>g. A course of continuous learning</b></p>	<p>Periodic reviews and updates of policies and procedures as per the Board Policy Map and completion of relevant training such as Respect at PN and Modern Slavery Awareness training. Engagement with relevant industry associations through Modern Slavery Working Groups.</p>
<p><b>h. Based on engagement and dialogue</b></p>	<p>We engage with employees, suppliers, and stakeholders to ensure our grievance mechanisms remain effective, trusted, and responsive to emerging risks and concerns.</p>

## Modern Slavery Risks

Pacific National acknowledges the risk that modern slavery may be present in our operations and supply chain. In response, we implement effective risk management processes to ensure that we keep our people safe and mitigate Modern Slavery risks across our supply chain. Modern slavery risk is embedded into our overall risk governance, assessment reporting and audit.



## Our Operations

There is an inherent risk of modern slavery related to the potential exploitation of our workforce. Given the nature of employment arrangements for our employees, our governance, policy framework, and employee training, we have assessed the residual risk of exploitation of our employees as low.

The majority of our workforce is engaged through permanent contracts. Most of our employees are engaged through Enterprise Agreements (EAs) approved by the Fair Work Commission following a bargaining and voting process. The rest of our employees are engaged through common law contracts.

We have well-defined internal processes that allow us to minimise risk of modern slavery in our operations:

- All Pacific National employees must have valid working rights, which are established during the recruitment and hiring process.
- During induction, all new employees complete mandatory training on the Respect at Pacific National, Our PNA - The Pacific National Approach, Health, Safety and Environment at Pacific National and Code of Conduct Policies. This training is refreshed every two years to ensure ongoing awareness and alignment with company standards.
- Our policy suite includes practices that commit our organisation to providing fair and inclusive working conditions, that support wellbeing, good health, and inclusion for all our employees, suppliers, and contractors.
- We continue to work on ensuring that we have an inclusive and diverse workforce, with Pacific National being recognised by WORK 180 as a top employer for gender equity for the second consecutive year.

## Our Supply Chain

We acknowledge that we may be contributing to, or be linked to, risks of modern slavery in our supply chain. This includes a range of risk factors in several categories of goods and services we acquire. These risks depend largely on where the goods are manufactured and the conditions of employment and cultural factors in those locations. Modern slavery risks associated with these products include child labour, forced labour, and debt bondage.

We adopt a risk-based approach to identify and manage modern slavery risks, continually assessing our supply chain as our operating environment and business relationships evolve. We completed a modern slavery risk assessment using the Global Slavery Index, evaluating our top 50 suppliers and categorising risks based on actual and potential human rights impacts in line with the UN Guiding Principles on Business and Human Rights.

Key focus areas identified include:

- High-risk categories with material procurement spend, such as fuel supply, which may carry indirect modern slavery risks.
- High-risk services procured within Australia, including labour hire, cleaning, and security services.
- High-risk primary suppliers with extended supply chains, where secondary suppliers may pose additional risks.

We engage with our primary suppliers to assess their modern slavery risk management practices. Given the complexity of our supply chain, we have limited visibility over secondary suppliers and are working to increase transparency and better understand risks beyond our direct supply relationships.

We monitor relationships with labour hire providers, particularly those delivering cleaning, garden maintenance, IT, project management, and recruitment services. We prioritise reputable suppliers with a strong Australian presence and maintain robust ongoing relationships. Notably, three suppliers providing train crew labour account for 90% of our labour hire spend.

## Actions Taken

### Procurement Framework

We continue to refine our Procurement Framework which includes standardised procurement process. Each stage includes several risk mitigation tasks, including ESG and Modern Slavery risk assessments, Modern Slavery-specific supplier questionnaires, and ongoing risk monitoring.

All procurement tenders contain specific questions relating to modern slavery, including requesting from prospective suppliers of their strategies (such as copies of modern slavery statements). All Pacific National contract templates contain specific clauses related to modern slavery.

### Indigenous Procurement Strategy and Supply Nation membership

We are implementing our first Indigenous Procurement Strategy which was launched 2024.

This year, we have become a member of Supply Nation, Australia's largest national listing verified of Aboriginal and Torres Strait Islander businesses. The platform enables us to connect and engage with over 5,000 certified and registered enterprises.

**Modern Slavery Training Module**

Continuously improving our human rights and modern slavery management practices is important to delivering on our company values. Our team understands that Pacific National needs to build internal capability to better manage modern slavery risks within our operations and supply chain. This year, we launched a new Modern Slavery Awareness eLearning module. Employees from Operations, Procurement, HSE, and People & Culture have successfully completed the Modern Slavery training. The training package provides education on key modern slavery matters, from definitions to identifying warning signs and risks; legislative obligations under the Modern Slavery Act; and our approach to human rights management.

**Onboarding and Induction Program**

Modern Slavery awareness has been incorporated into our new starter onboarding and induction program.

Progress against FY25 Modern Slavery commitments is outlined in Table 4.

**Table 4. Progress against FY25 Modern Slavery Commitments.**

FY25 Commitment	FY25 Actions taken
<b>Education and Awareness</b>	
Increase modern slavery awareness and risk mitigation practices internally by refreshing materials available to Pacific National employees via our intranet and social networking platform.	Introduced a new employee induction module “Introduction to Modern Slavery”.  Launched a Modern Slavery eLearning Module for all employees.
<b>Supply Chain and Operations</b>	
Automate the assessment requirements relating to supplier modern slavery risk during the tender process.	Re-evaluating the viability of procurement software solutions supporting supplier Modern Slavery Risk Assessment.
Maturing practices related to supplier modern slavery assessment upon engagement of suppliers.	Assessed 530 suppliers through the Avetta supply chain management platform. Eighty five per cent of suppliers registered with Avetta have completed our Modern Slavery assessment questionnaire.
Continue risk profiling primary suppliers.	Continued primary supplier risk profiling and will continue this into FY26 along with completing desktop reviews based on supplier risk profiles.
Establish a contract management framework which focuses on risk management, innovation, performance management and contract compliance.	In FY25, we continued to develop our procurement framework focusing on modern slavery risk mitigation.
<b>Internal Reporting</b>	
Modern slavery reporting from Avetta to be provided to Pacific National ESG Team and Executive Leadership Team.	Work on the Avetta dashboard was delayed last year. This action will carry over into a FY26 commitment to develop a Modern Slavery reporting dashboard that includes key Modern Slavery risk indicators.
<b>Update Recruitment Procedure</b>	
To include additional requirements on rights to work, minimum working age and child labour.	The updated recruitment procedure has been drafted and will be rolled out in FY26.

## Effectiveness of Actions

The effectiveness of Pacific National's actions to address modern slavery risks continue to be tracked through the following metrics:

**Education** – we launched a Modern Slavery eLearning Module and integrated Modern Slavery awareness into our onboarding induction program. To date, 108 employees from Operations, Legal, Procurement, HSE, and People & Culture have successfully completed the Modern Slavery training.

**Awareness** – grievance mechanisms are promoted through internal communication channels and public website, providing opportunity for free and accessible reporting. As at 30 June 2025, 88% of employees and contractors had completed our Code of Conduct training, supporting awareness of our grievance processes.

**Feedback** – action taken in response to any feedback from internal and external stakeholders. This feedback informs updates to our training content, awareness campaigns, and supplier engagement processes to ensure our approach remains relevant and responsive to any identified risks.

**Supplier engagement** – we have assessed 530 suppliers via the Avetta supply chain management analytics platform. Eighty five percent of Avetta registered suppliers completed our modern slavery assessment questionnaire, strengthening our supply chain management.

**Mitigation** – the timeliness of actions where any grievances have been reported or breach of policies identified. We had 34 Whistleblower complaints in FY25 with 23 of these considered as 'protected disclosures' in line with our Whistleblower Policy. None of these disclosures were related to modern slavery.

## Our Focus for the Next Year

### Education and Awareness

- Broaden Modern Slavery awareness across Pacific National by increasing the number of personnel completing the Modern Slavery Awareness eLearning module.

### Supply Chain and Operations

- Continue risk profiling primary suppliers.
- Conduct desktop reviews based on supplier risk profiles.

### Modern Slavery Dashboard

- Develop a Modern Slavery reporting dashboard that includes key Modern Slavery risk indicators.

### Modern Slavery Risk Management

- Formalise process for dealing with potential Modern Slavery instances within our operations and supply chain.

## Mandatory Criteria

Modern Slavery Statement Mandatory Criteria	Section reference	Page
1. Identify the reporting entity	About this statement	3
2. Describe the reporting entity's structure, operations, and supply chains.	About Pacific National	5
	Our Operations	6
	Our Workforce	7
	Our Supply chain	8
	Our Modern Slavery Governance	12
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities the reporting entity owns or controls.		
	Modern Slavery Risks	17
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.		
	Actions Taken	18
5. Describe how the reporting entity assesses the effectiveness of such actions		
	Effectiveness of Actions	20
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.		
	About This Statement	3

## Appendix A

### Reporting entities included in this Modern Slavery Report

Name	Description
Australian Logistics Acquisition Holdings Pty Ltd (ABN 28 611 628 909)	The ultimate holding company
Australian Logistics Acquisition Investments Pty Ltd (ABN 85 611 628 712)	Subsidiary of the ultimate holding company
Pacific National Holdings Pty Ltd (ABN 26 123 652 862)	Subsidiary of the ultimate holding company
Pacific National Holdings (Rail) Pty Ltd (ABN 34 123 684 051)	Subsidiary of the ultimate holding company
Pacific National Rail Holdings Pty Ltd (ABN 72 098 059 137)	Subsidiary of the ultimate holding company
Pacific National Pty Ltd (ABN 39 098 060 550)	Subsidiary of the ultimate holding company
Pacific National Services Pty Ltd (ABN 48 052 134 362)	Subsidiary of the ultimate holding company
Pacific National (Queensland Coal HoldCo) Pty Ltd (ABN 51 130 556 151)	Subsidiary of the ultimate holding company
Pacific National (Queensland Coal) Pty Ltd (ABN 63 129 529 648)	Subsidiary of the ultimate holding company
Pacific National (NSW) Pty Ltd (ABN 83 099 150 688)	Subsidiary of the ultimate holding company
ACN 106978330 Pty Ltd (ABN 52 106 978 330)	Subsidiary of the ultimate holding company