

# METRO TRAINS MELBOURNE MODERN SLAVERY STATEMENT 2024/2025

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(For financial year 1 July 2024 to 30 June 2025)



**“Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:**

- *human trafficking*
- *slavery*
- *servitude*
- *forced labour*
- *debt bondage*
- *forced marriage, and*
- *the worst forms of child labour”*

Australian Government, Attorney-General’s Department<sup>1</sup>



Metro acknowledges the Victorian Traditional Owners of the land on which our rail network operates, the Wurundjeri Woi Wurrung and Bunurong peoples of the Kulin Nation. We pay respect to their Elders, past, present, and emerging, and to their cultural and spiritual connections to Country and Waters. We recognise that our trains move people every day through a landscape that holds the footprints and stories of thousands of generations of Aboriginal Victorian communities.

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<sup>1</sup><https://modernslaveryregister.gov.au/about/>

## ABOUT MELBOURNE TRAINS MELBOURNE

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Metro Trains Melbourne (Metro) operates and maintains Melbourne’s metropolitan rail network. It is a consortium of leading rail and construction businesses by MTR Corporation, John Holland Group, and UGL Rail that delivers services on behalf of the State Government of Victoria.

Metro began operating the network in 2009. The current franchise, awarded in 2017, has recently been extended to 2027.

With a fleet of more than 269 trains operating across nearly 1,000 kilometres of track, Metro works as a unified team to provide safe, reliable train services and an exceptional passenger experience for both Victorians and visitors to Melbourne.

The network comprises 16 lines and 222 stations. Metro delivers thousands of services every day, seven days a week, moving hundreds of thousands of passengers.

The organisation employs approximately 7,000 people, including train drivers, station staff, engineers, signallers, and network controllers, all from diverse backgrounds and fields of expertise.

As the Accredited Rail Operator, Metro plays a vital role in supporting the Victorian Government’s major rail infrastructure projects. This includes the delivery of new infrastructure and assets, such as trains and stations, to enhance safety, increase capacity, and improve service reliability. Metro collaborates with a range of partners to support key initiatives, including the Metro Tunnel and the Level Crossing Removal Project.

Metro does not own or control any other entities.



## CEO FOREWORD

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Metro moves Melbourne. As one team we work to deliver safe, reliable train services, and an exceptional passenger experience for all Victorians and visitors to Melbourne. Metro maintains and renews the railway network, ensuring assets operate safely and reliably. We partner with the Victorian State Government to deliver city-shaping projects, including the new Metro Tunnel and build Melbourne's railway of the future.

With a large operational footprint and reach across our city, Metro has an important responsibility to the community.

This is our latest Modern Slavery Statement and details Metro's actions over the past year. Some of the actions include developing a Supply Chain Modern Slavery Risk Management Framework and reassessment of supply

chain risks. As part of Metro's commitment to fostering a safe, inclusive, and respectful workplace, Metro conducted an employee engagement survey during the year.

We continue to progress our work, guided by our 2024-2027 roadmap. The Metro values of Caring, Safely Always, Dependable, One Team and Make a Difference guide us in what we do every day. Metro remains committed to working towards the eradication of modern slavery.

Raymond O'Flaherty  
CEO Metro Trains Melbourne  
December 2025



# METRO OPERATIONS AND SUPPLY CHAIN

## Operations

Metro has three primary delivery teams responsible for operating and maintaining the metropolitan rail network, as well as supporting major rail infrastructure projects.

The **Operations and Passenger Delivery** team oversees the end-to-end management of network performance, encompassing strategic planning and daily service delivery.

The **Network Assets and Assurance** team is accountable for the management, assurance, and performance of Metro's network assets.

The **Projects Delivery** team supports the Victorian Government's Big Build program. This includes working with multiple partners, in Metro's role as the Accredited Rail Operator, to undertake significant infrastructure works. These projects include the removal of dangerous and congested level crossings, construction of the Metro Tunnel, and ongoing upgrades and improvements across the network.

These delivery teams are supported by the Corporate Affairs, Finance and Commercial, and Safety and People functions.



## Supply chain

Metro engages directly with more than 900 suppliers, with approximately 100 of these accounting for around 80 per cent of Metro's total expenditure. These suppliers provide a wide range of goods and services that support the operation, maintenance, and enhancement of the metropolitan rail network.

The goods and services procured include:

- Infrastructure construction, maintenance, and renewals
- Rolling stock maintenance, renewals, and spare parts
- Engineering, professional, scientific, and technical services
- Electricity and other utilities
- Manufactured goods, spare parts, and materials
- Plant, machinery, security services, and labour hire
- Buses and taxis to manage passenger disruptions
- Graffiti removal, vegetation management, and facilities management for rolling stock, stations, depots, and the rail corridor
- Technology, operational control and management systems, software, hardware, and related services
- Office leases and telecommunications
- Banking, insurance, travel, marketing, and consultancy services

Metro's supply chain is predominantly based in Australia and New Zealand. This aligns with the Local Industry Development Plan commitments that form part of Metro's agreement with the State Government.

Items sourced from overseas are typically specialised technical products such as electronics, signalling equipment, and rolling stock spare parts. Such materials are classified as 'Type Approved', and are sourced from Original Equipment Manufacturers (OEMs). For other imported goods, Metro seeks to procure through well-established local distributors.

# RISKS

## Operational risks

Metro's operational structure is highly localised, with employees substantially covered by union representation and common law contracts. As a result, the risk of modern slavery within Metro's direct operations is considered low.

Frontline employees are entitled to union representation and are remunerated under enterprise agreements that have been negotiated and verified by the Fair Work Commission. More than two-thirds of Metro's workforce is employed under these agreements.

The remaining employees are typically professionals engaged under common law contracts, which provide all legal entitlements and protections required under Australian law.



## Supply chain risks

The majority of Metro's expenditure on goods and services for the operation and maintenance of the rail network is directed to suppliers and distributors located within Australia or New Zealand.

However, certain categories of locally sourced services are considered higher risk. These typically involve manual tasks that do not require formal qualifications, such as non-specialist cleaning, security services, and low-skilled labour hire. These roles are often filled by migrant workers and are characterised by high turnover and ease of worker replacement, which can increase vulnerability to exploitation.

With advancements in technology and the global shift toward remote work, emerging risks have been identified in locally sourced IT software and support services, as well as professional, engineering, and consultancy services performed by offshore resources. In such cases, employment conditions may be obscured, making it difficult to assess labour standards and compliance.

High-risk categories of goods, materials, and spare parts include items that are either manufactured or sourced from overseas or produced locally using imported components or raw materials. These categories encompass consumer products such as stationery, uniforms, personal protective equipment (PPE), IT equipment, and food and beverages, as well as Original Equipment Manufacturer (OEM) products. Particular concern is given to items sourced from countries identified as high-risk in the Global Slavery Index.

Metro primarily has visibility over its first-tier suppliers. Through the Avetta supplier prequalification platform, Metro collects data on the source countries of goods and services provided by directly engaged suppliers. This includes both locally and internationally sourced products and services.

# ACTIONS

Metro continues to advance its Modern Slavery Roadmap initiatives while implementing ongoing measures across its operations and supply chain. The 2024–25 financial year represents a period of learning and strengthening Metro’s approach to managing supply chain risks related to modern slavery, alongside the continuation and enhancement of existing practices.

Key actions undertaken include:

- As part of Metro’s commitment to fostering a safe, inclusive, and respectful workplace, Metro conducted an **employee engagement survey** during the year.
- The **Metro Modern Slavery Working Group comprising senior leadership** was established and met regularly to collaborate and share insights. This group supports the progression of Modern Slavery Roadmap initiatives and ensures alignment with broader business priorities, with periodic updates provided to Metro’s Executive team.
- Following the introduction of the **Metro Modern Slavery Guiding Principles for Supply Chain**, Metro developed its own **Supply Chain Modern Slavery Risk Management Framework**. This framework enhances internal employees’ awareness and provides clarity on Metro’s approach and the measures implemented to address modern slavery risks within the supply chain.

- Metro has refreshed its **e-learning** module on the Metro **Contract Management Framework** that provides structured guidance for managing contracts effectively and ethically at Metro, with a strong emphasis on compliance, performance, and risk mitigation. The e-learning module will be rolled-out in the coming financial year and completion will be mandatory for all contract managers across the business and the Procurement team.
- Ongoing source country data collection through the Avetta platform, as part of Metro’s supplier prequalification and monitoring processes, was analysed and converted into a visual **reporting dashboard**. This dashboard is accessible to individuals who perform sourcing, contracting and contract management activities.



- Metro implemented the **Labour Hire Procurement Process** and the **Independent Contractor Engagement Process**. These processes aim to mitigate risks associated with unethical labour supply across Metro’s operations and supply chain. This process also ensures that all labour hire engagements, whether for individual supplementary resources or as part of broader work packages, are centrally managed and aligned with the principles of fairness and compliance.

- **Desktop benchmarking** was conducted with Australian-based rail operators. By reviewing their most recent Modern Slavery Statements, Metro identified areas for improvement and gathered ideas for future initiatives.
- Metro actively participates in both the **Australasian Railway Association (ARA)** and the **Metro Corporate Group Modern Slavery Networks**, enabling the organisation to share experiences and learn from other rail operators and suppliers.
- The **timeline of Metro’s Modern Slavery Roadmap initiatives** was reviewed to ensure better alignment with business priorities and to maintain visibility of progress.

## Ongoing Risk Management Practices

### Within Metro's operations

- Metro continues to submit its annual Modern Slavery Statement to the Government's online register. The statement is published on Metro's internal and external websites, accompanied by communications via LinkedIn, targeted emails to Metro's Senior Leadership Group, and an article in the internal employee newsletter.
- Metro has established procedures to support employee wellbeing, including the Workplace Bullying, Discrimination and Harassment Procedure, and the Employee Wellbeing and Assistance Programs.
- Whistleblower and complaint channels are available to both internal and external stakeholders.

### Within Metro's supply chain

- Supplier onboarding and ongoing monitoring are conducted through the Avetta platform. This process assesses suppliers' occupational health and safety statistics, unresolved offences, labour hire licences, and subcontractor management practices where applicable. The majority of Metro's suppliers are monitored through this platform.
- Data collected via Avetta includes information on suppliers' compliance with the Modern Slavery Act, the source countries of goods and services supplied to Metro, and the existence of internal policies aimed at preventing modern slavery. This process also raises awareness of modern slavery obligations among new suppliers.
- Sourcing and tender processes for high-risk categories include restrictions on subcontracting, assessment of labour costs and rates, review of past and current offences or pending litigation, and evaluation of corporate policies related to worker welfare. A probity advisor is appointed to oversee high-risk tender events to ensure robust supplier selection processes are followed.
- Documented guidance for due diligence in sourcing processes includes considerations for identifying and mitigating modern slavery risks. This is conducted prior to contract award to ensure Metro engages only reliable and reputable suppliers with demonstrated integrity.
- The Community of Practice for Sourcing and Contract Management serves as a forum to communicate planned changes and initiatives, share lessons learned, and promote best practices through case studies. It reinforces the requirements of Metro's Procurement Policy and Procedures, contract management framework and supports continuous improvement in contract and supplier management across all teams.

- Identification and mitigation of people-related risks are embedded within Metro's Contract Management Framework. This includes the use of the Risk-Value Contract Classification Tool, the Risk Register, and the Supplier Annual Due Diligence Checklist.
- Metro's legal contracting templates include provisions that restrict subcontracting, grant audit rights, and require reporting on labour hours and pay. These measures support compliance and contribute to Metro's efforts to prevent modern slavery.
- Metro monitors compliance with the Labour Hire Licensing Act (LHLA) and promotes adoption of the LHLA scheme as a risk mitigation strategy for high-risk categories. Guidance is provided to both supply chain partners and internal business areas.
- Suppliers are given the opportunity to remediate any irregularities identified through ongoing monitoring or contract management activities. Remedial plans are developed and followed up by a Metro representative.
- Lessons learned from identifying and remediating irregularities are documented and considered in future sourcing and contract management activities.



## ASSESSING EFFECTIVENESS

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Metro acknowledges that its processes for reviewing the effectiveness of modern slavery measures are still in the early stages of development. These processes will continue to evolve over the coming years as part of Metro's Modern Slavery Roadmap.

During the reporting period, Metro undertook the following activities to assess and strengthen its approach:

- Metro collaborated with strategic suppliers to conduct cost reviews, ensuring their operations remained sustainable. These reviews also assessed how suppliers were managing inflationary pressures in relation to employee welfare and job security, in accordance with regulatory reporting requirements.
- Metro's inventory planning and management approach helped suppliers mitigate the impact of global logistics disruptions on production and workforce stability, without causing operational disruptions for Metro.
- The modern slavery question sets on the Avetta platform, as part of supplier prequalification, reached more than 1,000 businesses, including 80 per cent of Metro's active suppliers. Of these, 84 per cent provided quality responses, contributing valuable data on the source countries of goods and services, and raising awareness of obligations under the Modern Slavery Act.
- The Environmental, Social and Governance (ESG) data collection and Business Risks modules continued to reach over 1,100 businesses. The response rate was 82 per cent for ESG questions and more than 90 per cent for Business Risk scores. This data supports Metro in identifying relevant monitoring requirements and assessing modern slavery risks.
- During the year, 37 complaints were submitted through whistleblower and supplier complaint channels. Of these, 4 related to labour issues. All were investigated and resolved.
- Approximately half of Metro's workforce participated in the employee engagement survey, and the results reflected a strong overall engagement score, with employees reported a sense of belonging, confidence in career development opportunities, and alignment with Metro's corporate values. These outcomes support Metro's broader efforts to uphold human rights, promote decent work, and mitigate modern slavery risks across Metro's operations.



# LOOKING FORWARD

Metro Trains Melbourne will continue to advance its endorsed multi-year Modern Slavery Roadmap, guided by adapted principles that support a structured and strategic approach to managing modern slavery risks.

Metro will regularly review and update its policies, processes, and frameworks to ensure a consistent and aligned approach to labour and human rights matters across the organisation.

Efforts to raise awareness and strengthen the prevention, detection, and response to modern slavery will be ongoing. This includes the development and distribution of toolkits to equip Metro employees with the knowledge and resources needed to identify and address modern slavery risks effectively.

Metro will continue mapping the source countries of procured goods and services to gain deeper insights into its supply chain. This will help ensure that suppliers sourcing from countries with high vulnerability are actively managing associated risks.

Metro remains committed to reinforcing modern slavery obligations with its suppliers and will encourage the

adoption of proactive risk management practices where appropriate.

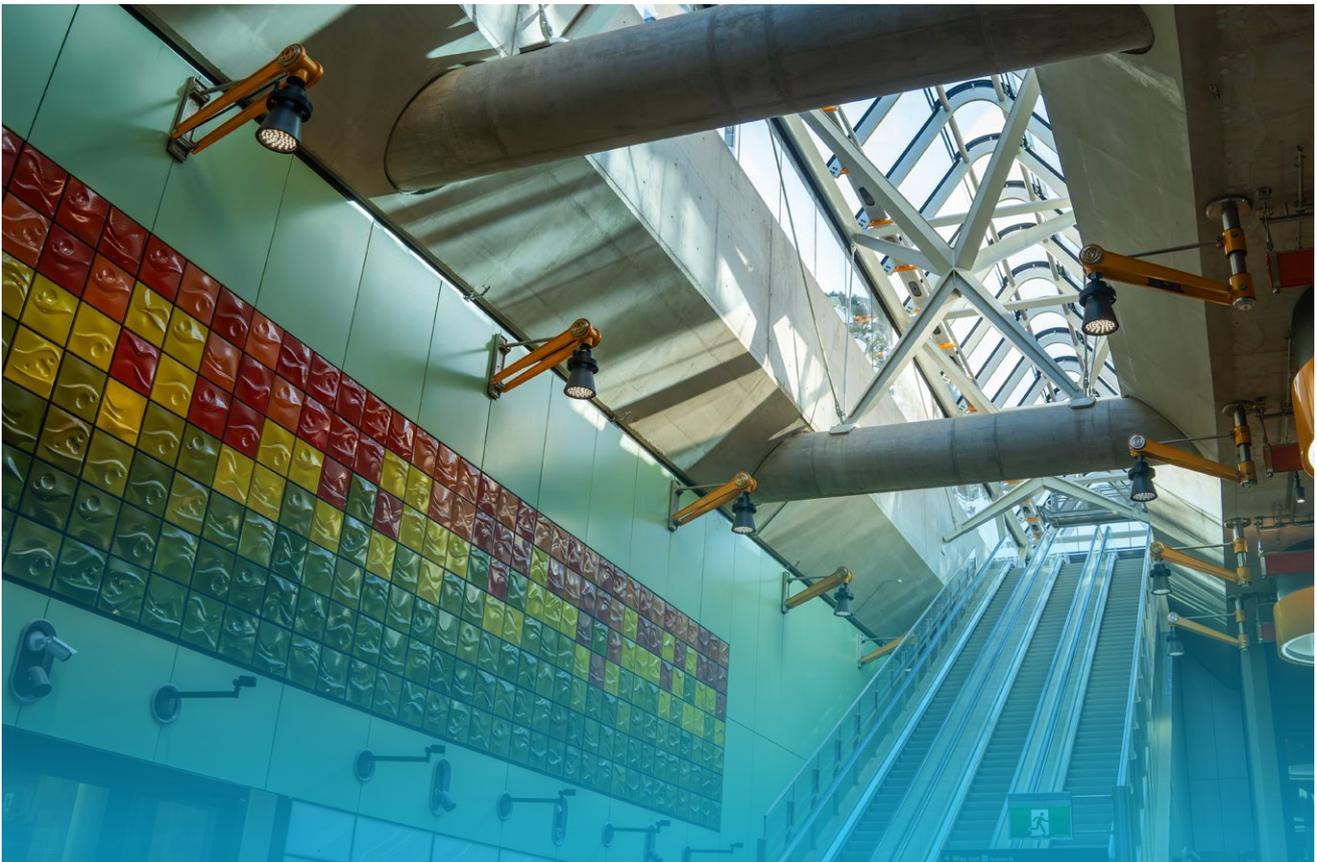
In instances where modern slavery or unethical practices are identified, Metro will take steps to minimise further harm to victims or potential victims. These situations will be managed through Metro’s standard terms and conditions, procurement policy, sourcing procedures, and ongoing contract management processes.

This Statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and has been approved by the Board of Metro Trains Melbourne on 9 October 2025.

Signed



Raymond O’Flaherty  
CEO Metro Trains Melbourne  
December 2025



#### Mandatory criteria

#### Section heading and page number

a. Identify the reporting entity.	Front, About Metro Trains Melbourne – pg 3, Back
b. Describe the reporting entity’s structure, operations, and supply chains.	Metro operations and supply chain – pg 5
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks – pg 6
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Actions – pg 7-8
e. Describe how the reporting entity assesses the effectiveness of these actions.	Assessing effectiveness – pg 9
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	About Metro Trains Melbourne – pg 3
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Looking forward – pg 10



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**Metro Trains Melbourne Pty Ltd (ABN 43 136 429 948)**

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