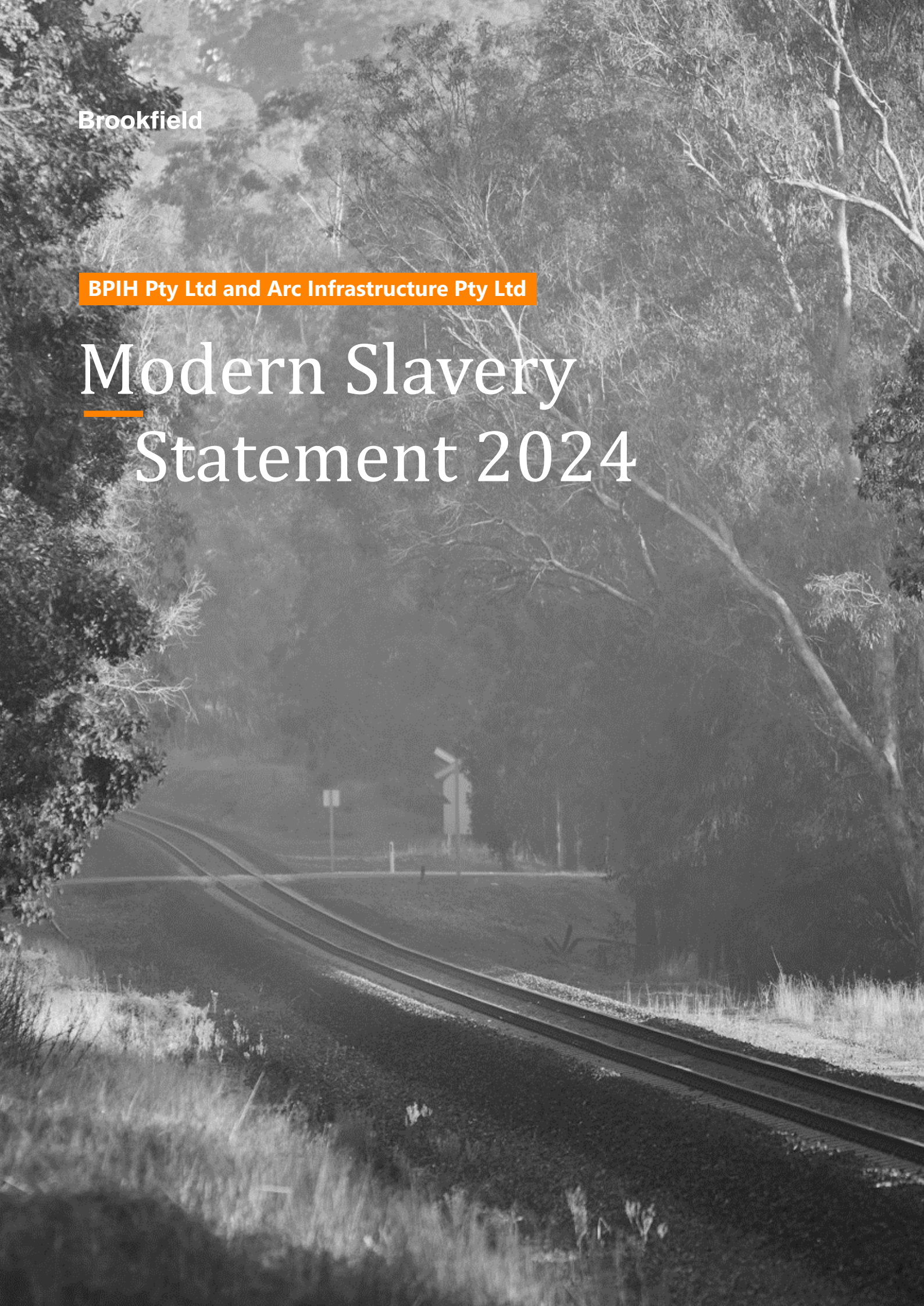


Brookfield

BPIH Pty Ltd and Arc Infrastructure Pty Ltd

# Modern Slavery Statement 2024



# Background

This Modern Slavery Statement (**Statement**) is made by BPIH Pty Ltd (**BPIH**) on behalf of itself and its subsidiary, Arc Infrastructure Pty Ltd (**Arc**), together the Reporting Entities, in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**), for the financial year ended 31 December 2024 (**Reporting Period**). The Reporting Entities remain opposed to human trafficking and slavery both within their businesses and supply chains and fully support the objectives of the Act.

The Reporting Entities are part of the global Brookfield Corporation and Brookfield Asset Management Ltd. (**Brookfield**) group, which in Australia consists of diverse real estate, infrastructure, renewable power and private equity portfolios across key cities. Globally, Brookfield is a leading global alternative asset manager, focused on investing in long-life, high-quality assets across real estate, infrastructure, renewable power and transition, credit, and private equity. The Reporting Entities and their related entities represent a diverse portfolio of critical infrastructure assets, including transport, utilities, data and midstream. Brookfield is a signatory to the United Nations-supported Principles for Responsible Investment, which is part of our ongoing commitment to responsible investment and sustainability best practices. Brookfield seeks to employ best-in-class responsible investment, sustainability and corporate social responsibility practices, mindful of the important role this plays in fostering long-term value creation. In Australia, the Reporting Entities follow the same principles in day-to-day business activities.

In this Statement, references to “we”, “us” or “our” refer to the Reporting Entities. The Reporting Entities and controlled assets largely operate the same processes, supply chain management practices and operating systems.

# Structure, operations and supply chains

REPORTING ENTITY	STRUCTURE & OPERATIONS	SUPPLY CHAIN
<p><b>BPIH Pty Ltd</b></p> <p>ACN: 100 364 234</p> <p>Brookfield Place</p> <p>Level 19, 10 Carrington St, Sydney NSW 2000</p>	<ul style="list-style-type: none"> <li>• BPIH’s ultimate parent is Brookfield Corporation.</li> <li>• BPIH does not employ any employees.</li> <li>• BPIH is the head entity of a consolidated group which engages in the following activities:               <ul style="list-style-type: none"> <li>- corporate services, including administration, finance, treasury, tax, internal audit, information technology, company secretarial, compliance, sourcing/procurement</li> <li>- investment in infrastructure assets</li> </ul> </li> </ul>	<p>BPIH’s suppliers are primarily Australia based companies although some of the goods and services that they supply may originate from outside Australia.</p> <p>Suppliers domiciled outside Australia are predominantly located in Europe and are engaged to deliver professional services. Spend is distributed across approximately 20 vendors and several categories.</p> <p>The main types of goods and services procured by BPIH are:</p> <ul style="list-style-type: none"> <li>• Professional services including auditing, accounting, tax, legal, recruitment and advisory services primarily from top tier organisations.</li> <li>• Shared services provided by Brookfield related entities including outsourced finance and internal audit services</li> </ul>
<p><b>Arc Infrastructure Pty Ltd</b></p> <p>ACN: 094 721 301</p> <p>Level 3, 1 George Wiencke Drive</p> <p>Perth Airport WA 6105</p>	<ul style="list-style-type: none"> <li>• Arc is a railway infrastructure manager and access provider in Western Australia with a long-term lease on the rail freight network from the State of Western Australia.</li> <li>• Arc operates and maintains approximately 5,500 kilometres of standard, narrow and dual gauge rail infrastructure across the State.</li> <li>• Arc employs approximately 582 staff where:               <ul style="list-style-type: none"> <li>- 93% are employed on a full-time basis, 5% on part-time and 2% on casual</li> <li>- 89% are permanent workers, 9% are contract workers and 2% are casual workers</li> <li>- 21% are female workers and 79% are male workers</li> </ul> </li> <li>• Arc has a number of offices spread across the Perth metropolitan area and the regional areas within the southern half of Western Australia. Its head office is based at Perth Airport.</li> <li>• Staff are employed across the various offices in the following functions:               <ul style="list-style-type: none"> <li>- Administration (finance, human resources, risk and compliance, communications, information technology, procurement, commercial and regulatory, business support and facilities management)</li> </ul> </li> </ul>	<p>The majority of Arc’s tier one suppliers are Australia-based companies, although some of the goods and services that they supply originate from other countries. Arc’s annual spend is distributed across approximately 1,000 suppliers and several categories, including:</p> <ul style="list-style-type: none"> <li>• railway infrastructure materials, equipment and services</li> <li>• engineering and project management services</li> <li>• building construction, repair and maintenance services</li> <li>• software, IT and telecommunications services and hardware</li> <li>• electronics</li> <li>• travel and accommodation services</li> <li>• work wear and personal protective equipment (PPE)</li> <li>• building cleaning and security human resources services</li> <li>• logistics</li> </ul> <p>Arc’s largest categories of supplier spend relate to rail infrastructure costs, including rail, electrical components, labour, rail maintenance and civil construction services.</p>

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- Health, safety and environment
  - Track maintenance
  - Track signalling and communications
  - Engineering
  - Projects
  - Network operations
  - Asset Strategy and Planning
  - Contract workers and casual workers perform a wide range of roles across all functions, from IT and network operations, through to business support officers and project engineers.
  - Arc is part of the Arc Infrastructure WA Pty Ltd group which includes 10 entities with Arc being the operating entity who engages with all of Arc's suppliers.
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# Modern slavery risks in operations and supply chains

In the Reporting Period, the Reporting Entities did not identify any instances of modern slavery in our operations or supply chain. We acknowledge that this does not necessarily mean that modern slavery was not present in our supply chain, and that we continue to seek improvement in our ability to identify modern slavery risks in our operations and supply chain.

## MODERN SLAVERY RISKS IN OUR DIRECT WORKFORCE

Given the fact that our operations have remained largely unchanged from 2023, we remain of the view that the risks of modern slavery practices within our direct operations and workforce is low. Employees of the Reporting Entities are based in Australia (primarily Western Australia), which is ranked 149 out of 160 countries for modern slavery prevalence by the 2023 Global Slavery Index (GSI). Despite the low prevalence of modern slavery in Australia, the GSI has brought to light that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This estimate reminds us that despite Australia's strong rule of law and efforts by the government, business community and individuals as consumers to mitigate the risks, modern slavery occurs in Australia.

We remain conscious of the GSI finding in the way in which we conduct our recruitment of our workforce and implement workplace policies and procedures. For example, as noted in our previous statements, human resource policies, procedures and processes are in place and designed to ensure that staff are remunerated in accordance with applicable laws and awards and/or agreements and are working of their own free will, including their rights under the employment agreements. All workers are free to join unions or associations relating to their employment. These measures are in place to safeguard our workers, especially those in manual labour roles.

We continue to maintain and monitor processes for reporting and resolution of staff concerns and grievances. Having regard to the aforementioned safeguards that continue to remain in place in our operations together with the low jurisdiction risk, our view is that there is a low risk that we have caused or contributed to modern slavery in our operations.

## MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

During the Reporting Period, we continued to review the potential risk of modern slavery within our supply chain. We remain committed to conducting our business in an ethical and responsible manner, including by carrying out our own procurement activities in a way that considers the modern slavery risks, including child and forced labor, in the supply chains of the goods and services that we procure. This is reflected in our contract terms with suppliers, due diligence processes, training and communications, as appropriate.

In accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we continue to take a risk-based approach to identifying the greatest areas of modern slavery risk within our supply chain. This approach enables us to prioritise our actions commensurate with risk.

Much like our operations have remained unchanged from 2023, our supply chain also remains largely unchanged. Accordingly, the description of modern slavery risks in our 2023 statement is largely consistent with the risks pertaining to our supply chain in 2024. The list below of categories within our supply chain with increased risks was based on indicators including inherent industry risks, raw materials risks within the components in finished goods supplied to us, and workforce profile – that is where a products' supply chain is reliant upon low-skilled workers, often on temporary visas:

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Cleaning and janitorial services

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Electronics and IT hardware and devices

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Catering and hospitality services

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Security services

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Building, construction, maintenance and repair services, and materials including solar panels

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Rollingstock

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Logistics

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Office supplies (tea/coffee, stationery and other consumables)

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Uniform and corporate merchandise

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Manufacturing

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Machinery and equipment wholesaling

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We recognise that each of our suppliers have their own supply chains risks and our category-based assessment sought to factor in these risks to the extent possible. A small number of our suppliers from the above categories operate in jurisdictions that are more vulnerable to modern slavery including China, Brazil, India, Taiwan and Indonesia.<sup>1</sup>

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<sup>1</sup> As drawn from the interim Modern Slavery Questionnaire (**MSQ**) results.

# Our approach to mitigating modern slavery risks in our operations and supply chains

The Reporting Entities remain committed to seeking improvement in their efforts to mitigate the risks of modern slavery in their operations and supply chain. In doing so, the Reporting Entities recognise the importance of embedding human rights considerations, including modern slavery, in the way we conduct our business activities, through training, communications, contracts, and due diligence processes as appropriate. These practices extend to our interactions with our key vendors and other business partners.

## POLICY FRAMEWORK

During the Reporting Period, our comprehensive framework of policies to mitigate modern slavery risk, as described in our 2023 statement, continued to apply. These policies describe the principles and requirements for our employees and for our vendors to follow and include:

- **Global Human Rights and Anti-Modern Slavery Policy**

Brookfield's global Human Rights and Modern Slavery Policy codifies our approach to respecting fundamental human rights and our efforts to identify and prevent human rights violations within our business and supply chain. This policy applies to employees of the Reporting Entities. This policy outlines the related policies and procedures and approach for communication, training, remediation and governance.

Importantly, the Policy makes clear that where Brookfield identifies that it has caused or contributed to human rights violations, it will, wherever practicable and reasonable, take appropriate action to mitigate or remedy the violation, taking into account all relevant circumstances (including, but not limited to (i) the extent to which Brookfield has directly caused or contributed to the violation, (ii) Brookfield's ability to influence the mitigation or remedy of the violation, and (iii) any wider consequences which may flow from Brookfield's action).

- **Code of Business Conduct and Ethics (Code)**

This Code outlines our commitment to, and expectations of, conducting business in an ethical and responsible manner and prohibiting child and other forced labour. It applies to all officers, employees and temporary workers, with annual certification of compliance.<sup>2</sup>

- **Procurement and Payment Policy and Control Principles**

These documents describe the process for sourcing, exercising due diligence and monitoring new and existing vendors and includes the process for managing risks including modern slavery. It applies to all employees of the Reporting Entities who have a procurement function.

- **Vendor Risk Management Framework**

This document describes the framework when purchasing goods or services for, or on behalf of, the Reporting Entities and defines the processes to assess, monitor and mitigate vendor risk. This includes modern slavery risks.

- **Sustainability Report<sup>3</sup>**

In 2025, Arc released its third annual sustainability report (for the 2024 reporting year) (**2024 Sustainability Report**) inline with its Sustainability Strategy. Arc's Sustainability Strategy describes Arc's analysis of the 17 UN Sustainable Development Goals (SDGs) and the supporting 169 targets, with a view to identifying how we could best contribute to these goals. It sets out our plan to embed and enhance sustainable practices across our business. Arc's 2024 Sustainability Report provides updates on the progress of key initiatives identified in Arc's Sustainability Strategy. Monitoring, assessing and preventing modern slavery is one aspect of Arc's Sustainability Strategy and is captured within the Safety and Risk Management theme.

- **Modern Slavery Standard**

This standard outlines the Reporting Entities' commitment to preventing modern slavery in its operations and supply chain, in line with the Australian Modern Slavery Act 2018 (Cth). The Standard outlines the measures in place to mitigate the risks of modern slavery in our operations and supply chains. These include modern slavery clauses in contracts, regular supplier assessments, Supplier Code of Conduct and awareness training.

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<sup>2</sup> <https://bam.brookfield.com/sites/brookfield-bam/files/BAM-IR-Master/Corporate-Governance/2024/BAM%20-%20Code%20of%20Business%20Conduct%20and%20Ethics%20May%202024%20English.pdf>

<sup>3</sup> [https://issuu.com/arcinfrastructurecommunications/docs/annual\\_sustainability\\_report\\_2024](https://issuu.com/arcinfrastructurecommunications/docs/annual_sustainability_report_2024)

- **Supplier Code of Conduct** <sup>4</sup>

Arc's Supplier Code of Conduct (**Supplier Code**) forms a key part of our Modern Slavery Framework. It outlines Arc's expectations and minimum standards for its vendors with respect to legal, ethical, environmental and social matters. It requires suppliers to comply with applicable modern slavery laws, manage modern slavery risks within their own supply chains, and also ensure that their own suppliers are similarly taking active steps to address and minimise the risks of modern slavery within their supply chains. Specific standards are detailed in relation to matters such as working conditions, wages, working hours, subcontracting and how to report concerns via Arc's complaints or whistleblowing mechanisms.

The Supplier Code reserves Arc's right to request information from suppliers and to undertake due diligence and risk assessments to verify supplier compliance. Arc's procurement contract templates were previously updated to include a requirement for Arc's suppliers to comply with the Supplier Code, and all new procurement contracts issued by Arc include a reference to the Supplier Code. During the Reporting Period, Arc continued with the inclusion of provisions requiring compliance with the Supplier Code in all extensions and variations of existing contracts to ensure they are updated to contain the Supplier Code.

## **PROCUREMENT**

We continued to implement mitigation strategies for high-risk vendors on a case by case basis - such as specific contract clauses in agreements, requesting the vendor to provide their modern slavery statement and evidence of their modern slavery mitigation strategies. The strategies may also include audits of their internal processes and policies and establishing grounds for spot audits.

- **Procurement Contract Templates**

Arc's procurement contract templates and vendor purchase order terms and conditions, where applicable, incorporate provisions prohibiting modern slavery practices by the vendor and requiring them to do all things necessary to mitigate or reduce risks of modern slavery within the vendor's operations or supply chain. During the Reporting Period, new procurement contracts entered into contained these modern slavery provisions and existing procurement contracts which were due for renewal were updated to include modern slavery provisions, wherever possible.

- **Vendor Due Diligence**

Those of our vendors considered to be potentially high risk of impacting human rights continue to be subject to ongoing monitoring via a third party online platform.

During the Reporting Period Arc developed a Supply Chain Mapping Assessment. The Supply Chain Mapping Assessment Template is an additional control designed to ensure that modern slavery due diligence is conducted at the purchase order level for specific goods and services provided by a supplier where Arc deems necessary.

In the Reporting Period, Arc used this template for the purchase of goods from a vendor where the vendor had sought to negotiate out of Arc's standard modern slavery clauses. Arc explained the importance and necessity of the clauses and managed to include the substantive elements of the clauses in the agreement. The variation resulted in the implementation of additional due diligence measures by Arc, including considerations of the vendor's sub-suppliers. The Supply Chain Mapping Assessment was then reported to Arc's Audit, Risk and Compliance Committee as part of the governance process and approval was subsequently given to proceed with procurement by virtue of the control measures put into place by Arc.

<sup>4</sup> <https://www.arcinfra.com/ARCInfrastructure/media/documents/Supplier%20info/W702-000-002-Supplier-Code-of-Conduct-Rev-1-00.pdf>



- **Contract Clause Compliance Framework**

During the Reporting Period, Arc engaged external subject matter experts to conduct an independent compliance review to assess supplier adherence to key contractual clauses and our Supplier Code of Conduct, with a primary focus on modern slavery, due diligence, and human rights obligations. The purpose of the review was to evaluate whether ten of our key suppliers were meeting their contractual commitments, particularly in relation to ethical sourcing, risk management, and compliance with regulatory frameworks such as modern slavery legislation. This was undertaken to validate supplier compliance with modern slavery obligations and assess the maturity of our suppliers in their understanding of the risks and measures to mitigate those risks.

The review process involved assessing supplier modern slavery statements published by suppliers, considering their due diligence procedures as described in the statement, and evaluating compliance with our warranty and representation clauses. Findings revealed that while some suppliers demonstrated compliance and risk management frameworks, others lacked transparency and failed to provide clear evidence of due diligence processes. In some cases, suppliers did not have documented policies or sufficient disclosures to verify their commitment to mitigating modern slavery risks in their operations and supply chains.

The review highlighted the importance of validating supplier compliance to prevent a “set and forget” approach, the need for enhanced due diligence procedures and stronger contractual enforcement. Key recommendations included requiring suppliers to demonstrate adequate procedures, implementing standardised compliance assessments, and reinforcing contractual obligations to ensure greater accountability and alignment with best practice.

## **TRAINING AND EDUCATION**

We continued to deliver mandatory training to our employees in relation to human rights and modern slavery. The training was provided via an eLearning module and covered the definition of modern slavery, why modern slavery is an important issue for the Reporting Entities and our employees, and the relevance to our operations and supply chains including example scenarios. It also advised employees on how to report a known or suspected modern slavery risk.

During the Reporting Period, Arc’s Procurement Contracts and Sourcing Lead continued to involvement in the [Australasian Railway Association \(ARA\)](#)’s Modern Slavery Network. The ARA Modern Slavery Network has been set up by the ARA for member organisations to discuss measures industry is taking to prevent modern slavery in the rail supply chain. Throughout the Reporting Period, Arc actively participated in all four quarterly meetings, fostering meaningful engagement with industry peers and gaining valuable insights into best practices and innovative initiatives implemented by other organisations. This ongoing participation strengthens Arc’s approach to modern slavery risk management. The network will continue to meet during the next reporting period to provide opportunities for information sharing and collaboration, further enriching Arc’s approach to modern slavery mitigation strategies through industry-wide knowledge exchange and the adoption of emerging best practices.

## **MODERN SLAVERY RISK MANAGEMENT AND DUE DILIGENCE**

During the Reporting Period, we continued to deploy our due diligence processes that form part of our Vendor Risk Management Framework which seeks to assess and respond to human rights and modern slavery risks.

Vendors are generally given a preliminary risk rating against an established criterion which determines their ongoing performance management and due diligence. Additional assessment and vendor engagement is conducted on vendors that are determined to be potentially high risk for modern slavery. Such vendors may be required to complete a modern slavery screening questionnaire to qualify and to provide services to the Reporting Entities, which is reviewed by a member of the procurement and risk teams as part of the vendor risk assessment and vendor approval process.

Arc continues to vet and monitor its vendors via a third party online platform to identify whether a vendor is potentially involved in any human rights or similar violations based on material available online. During the Reporting Period, this platform was further updated to help Arc to record its assessed modern slavery risk rating for each vendor to assist with data reporting.

During the Reporting Period, Arc conducted a deep dive into modern slavery risks within the cleaning and janitorial service providers across its depots. Cleaning services were selected due to their high-risk nature, given the industry’s reliance on low-wage, migrant, and casual labour, as well as the prevalence of subcontracting practices. The purpose of this enhanced due diligence process was to review and identify the vendors’ frameworks for mitigating modern slavery risks within their operations and supply chains. As part of this process, Arc reviewed the vendors’ policies and procedures relating to modern slavery, subcontracting agreements and recruitment practices in conjunction with the application of enhanced due diligence reports and ongoing monitoring via the third party online platform. Moving forward, Arc will continue to refine due diligence processes, expand supplier monitoring, and enhance training via

targeted supplier engagement sessions with key representatives to strengthen modern slavery risk management and best practices in this sector.

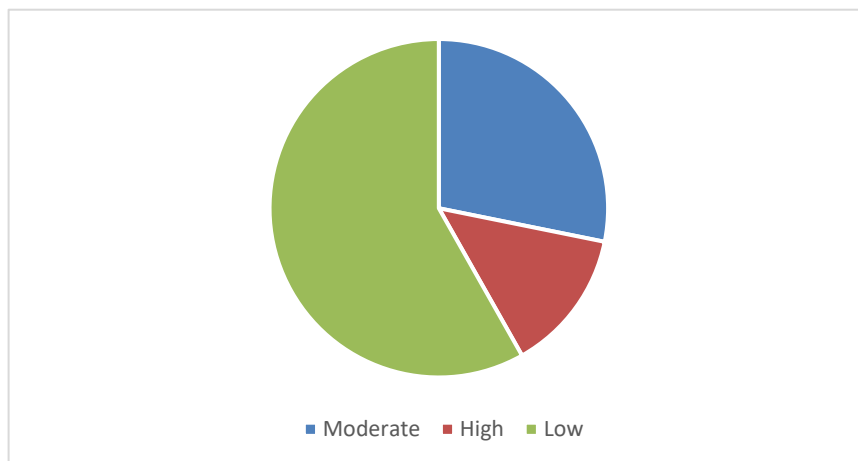
During the Reporting Period, Arc continued to issue our Modern Slavery Questionnaire to a targeted supplier list via the Ethixbase360 platform.

The Modern Slavery Questionnaire uses five key indicators to assess a supplier's modern slavery risk profile, namely:

- Jurisdiction (country) of operations and headquarters
- Industry of supplier / industry of goods & services supplied;
- Products attributed to high risk of modern slavery;
- Workforce characteristics; and
- Risk-mitigating measures specific to the individual supplier.

In the previous Reporting Period, Arc identified suppliers in its supply chain to target for the purposes of the questionnaire, focusing on vendors with significant annual spend and greater inherent risk based on industry, product type and geographical location. Below is a summary of the information obtained from the Modern Slavery Questionnaire undertaken during the Reporting Period:

- The Modern Slavery Questionnaire was issued to 267 suppliers. Of these suppliers 110 suppliers completed the questionnaire, equating to an overall completion rate of 41% (2023 completion rate was 33%).
- Suppliers that completed the Modern Slavery Questionnaire were assigned a risk rating based on their responses. Of these suppliers 64 suppliers were rated as low risk, 31 suppliers were rated as medium risk, and 15 suppliers were rated as high risk. The distribution of the risk ratings is shown in the chart below:



- Consistent with the findings of the 2023 Modern Slavery Questionnaire, the majority of suppliers who completed the 2024 questionnaire are domiciled in Australia, with some indicating they manufacture, source and operate from lower risk countries such as Germany, Japan, Austria, Belgium, Switzerland, US and UK. However, several suppliers source materials and services from higher-risk jurisdictions including China, Brazil, India and Indonesia, raising the potential exposure to modern slavery risks in our supply chain.
- The results of the questionnaire highlighted several suppliers that require further engagement to continue strengthening Arc's supply chain and approach to modern slavery risk management.
  - Suppliers without relevant policies and controls - Suppliers that reported having no relevant policies, controls, or codes in place, the majority of which are small to medium-sized enterprises (SMEs);
  - Suppliers unable to meet Arc's "Adequate Procedures" requirement - Suppliers who indicated they do not have sufficient procedures in place to prevent, detect, assess, manage, and remedy modern slavery risks;
  - Suppliers with limited contract knowledge - Suppliers who indicated they are unaware of the specific terms of their contract with Arc, including the modern slavery requirements; and
  - Suppliers operating within higher risk industries such as cleaning and janitorial, catering and hospitality services that employ potentially vulnerable worker groups, including labour hire and contract workers, low wage and base skill workers, migrant workers and workers under the age of 18.

### Offshore Manufacturing Project

Recognising the inherent risks within offshore supply chains, during the Reporting Period Arc undertook a deeper investigation into rolling stock manufacturing, specifically the ballast wagons acquired. This included conducting pre-manufacturing site visits at key offshore suppliers to assess labour conditions, safety standards, and ethical sourcing practices. An initial screening of the supplier and its sub-suppliers using the Ethixbase360 platform identified no immediate concerns but highlighted the need for ongoing monitoring due to inherent industry and country risks. Before attending site visits, project team members completed “How to visually identify modern slavery risks” training. Both facilities were found to be well-organized, highly automated, and compliant with expected safety and labour standards. Workforce demographics appeared consistent with those of an Australian manufacturing facility, with no observed indicators of forced or child labour. However, challenges in verifying worker backgrounds and historical concerns about forced labour in the region mean that we need to remain vigilant.

To address these concerns, we are strengthening supplier compliance requirements and conducting further engagement with suppliers to ensure transparency in their sourcing practices, including assessing raw material origins and conducting additional due diligence on sub-suppliers. Moving forward, we will seek to implement regular audits to ensure that modern slavery risks are effectively identified and mitigated.

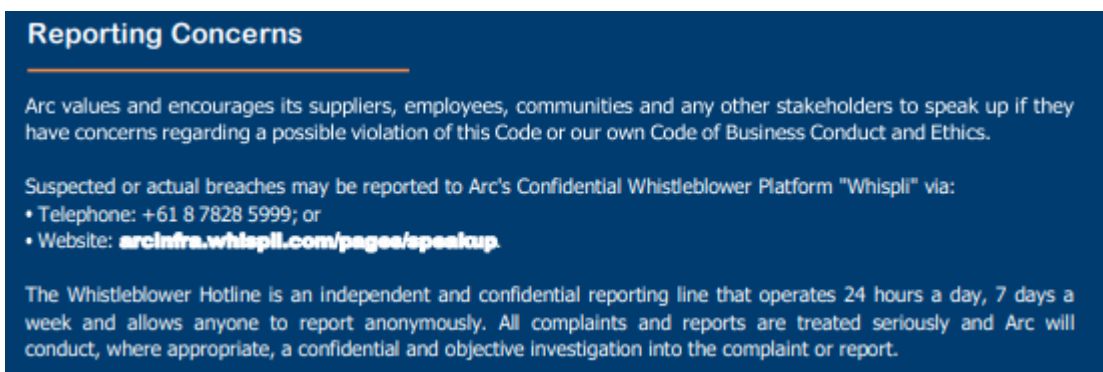
The insights gained from this process will guide our ongoing efforts to enhance due diligence, supplier accountability, and modern slavery risk management within our operations and supply chains. We remain committed to aligning with best practices outlined in the UNGPs while continuously refining our approach to identifying and mitigating modern slavery risks. As part of this commitment, Arc will collaborate closely with suppliers requiring further due diligence to address identified risks.

Beginning in June 2025, we will issue the annual Modern Slavery Questionnaire to all new suppliers during the supplier onboarding process. As well as targeted release of the questionnaire for existing suppliers classified as medium, and high risk of modern slavery. This initiative aims to transition the completion of the questionnaire into a standard operating practice for all suppliers, with a particular focus on making it a mandatory and ongoing task for medium and high-risk suppliers who remain part of our supply chain. The requirement for all suppliers to complete the updated questionnaire annually, aims to reinforce the expectation that modern slavery risk management is an integral and continuous part of their supply chain and daily operations.

## GRIEVANCES AND REMEDIATION

The Reporting Entities maintain and monitor an anonymous Reporting Hotline for its employees, vendors and other stakeholders to report any matters relating to unethical business conduct or violations of Laws, with the option to do so anonymously. Modern slavery is reportable on this hotline. During the Reporting Period, we did not receive complaints related to modern slavery via our Reporting Hotline or the whistleblower system.

The Reporting Hotline forms part of our Code of Business Conduct and Ethics and Supplier Code, which has been designed to provide protection to disclosers, ensure reports are dealt with appropriately, and protect disclosers from victimisation and retaliation. It is available toll-free, 24 hours a day, 7 days a week and may be accessed by phone or by Internet. It is managed by an independent third party and allows anyone to call anonymously to report in English and other languages. Details of Brookfield’s Reporting Hotline is included in its Code. The details of Arc’s Reporting Hotline are shown below:



**Reporting Concerns**

Arc values and encourages its suppliers, employees, communities and any other stakeholders to speak up if they have concerns regarding a possible violation of this Code or our own Code of Business Conduct and Ethics.

Suspected or actual breaches may be reported to Arc's Confidential Whistleblower Platform "Whispli" via:

- Telephone: +61 8 7828 5999; or
- Website: [arcinfra.whispli.com/pages/speakup](https://arcinfra.whispli.com/pages/speakup)

The Whistleblower Hotline is an independent and confidential reporting line that operates 24 hours a day, 7 days a week and allows anyone to report anonymously. All complaints and reports are treated seriously and Arc will conduct, where appropriate, a confidential and objective investigation into the complaint or report.

Remediation is approached on a case-by-case basis with the aim of protecting the victim from further harm. We would take guidance from the UNGPs in planning our response to remedy where we have caused or contributed to modern slavery. In the event that we become directly linked to modern slavery via the conduct of our suppliers, depending on the circumstances, we would seek to work with the supplier to identify the root cause and develop a collaborative corrective plan to mitigate similar risks arising again. In line with the UNGPs, we consider termination a measure of last resort given the further potential adverse impacts for workers and their families where termination is triggered.

# Assessing the effectiveness of actions taken

We seek to assess the effectiveness of our actions by reference to the following overarching measures:

- Regular engagement and feedback on the subject matter provided between core departments such as Portfolio Management, Risk Management, Finance, Legal and Human Resources
- Monitoring and reporting on modern slavery risks to management directors and Board reporting framework
- Data on the key risks, including of modern slavery, are collected by the Procurement Contract Team and is provided to the Governance and Risk Team who then report quarterly to Arc’s Audit, Risk and Compliance Committee
- Monitoring and tracking all reports to the Ethics Hotline

We also continue to review and report against a number of indicators. These include:

<b>Incidences of modern slavery in our operations</b>	In the Reporting Period, we had no reported incidents of our business causing or contributing to modern slavery in our operations.
<b>Incidences of modern slavery in our supply chain</b>	In the Reporting Period, we had no reported incidents of our business having caused or contributed to modern slavery in our supply chains.
<b>Incidences of modern slavery reported to our Reporting Hotline</b>	In the Reporting Period, there have been no incidents of modern slavery reported through our Ethics Hotline.
<b>Number of staff received modern slavery training</b>	In the Reporting Period, training was delivered: <ul style="list-style-type: none"> <li>• to all staff on modern slavery as part of their annual mandatory Code of Conduct training; and</li> <li>• to project team members prior to attending site visits to offshore manufacturing facilities.</li> </ul>

We recognise that the absence of reports via the Ethics Hotline does not necessarily equate to the absence of risks or issues, but rather, it may be a reflection on how well the Hotline is understood, trusted or accessed by relevant stakeholders.

In our 2023 modern slavery statement, we identified 5 measures to progress during 2024 as part of our commitment to continuous improvement in our approach to mitigating modern slavery risks. The work we have undertaken in relation to these measures have been described in this statement.

Within our next Reporting Period, the Reporting Entities will seek to:

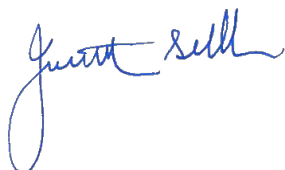
- continue our assessment of the supply chain for the manufacture of rollingstock being acquired by Arc offshore and collate key learnings and observations with a view to mitigating modern slavery risks in the raw materials used to manufacture rollingstock.
- ensure completion by the procurement team of the eLearning Ethical and Responsible Sourcing module provided by the Chartered Institute of Procurement and Supply (CIPS) to strengthen awareness and application of modern slavery risk mitigation in procurement practices.
- issue the updated 2025 Modern Slavery Questionnaire to new suppliers during the supplier onboarding process and existing suppliers that fall into Arc’s medium and high risk categories of modern slavery and continue to refine the Modern Slavery Questionnaire in conjunction with legal counsel.
- continue to identify supplier(s) operating in a higher risk sector with limited know-how in relation to modern slavery mitigation measures, including through review of MSQ results, and work with them to increase their capabilities to assess and address modern slavery risks in their operations and supply chains.

In addition to the above, Arc intends to capture the results of the 2025 Modern Slavery Questionnaire in the next modern slavery statement and continue to engage with select suppliers with a higher modern slavery risk profile following our due diligence processes.

# Process of consultation and approval

The Reporting Entities took a cross-functional approach to preparing and drafting this statement. A consultation process involving discussions with members of core departments, as well as the Directors, of the Reporting Entities was undertaken. The board of each Reporting Entity was given an opportunity to consider and provide comments to the Statement prior to publication.

This Statement has been approved by the board of directors of BPIH and Arc on 30 June 2025.



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Jonathon Sellar  
Director  
BPIH Pty Ltd



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Nathan Speed  
Director and Acting Chief Executive Officer  
Arc Infrastructure Pty Ltd