

## Modern Slavery Statement and Policy

Financial year 2022/2023

### Reporting Entity:

DB Rail are a signalling contractor based in Newcastle, Sydney and Wollongong who provide Rail Infrastructure Maintainers with a reliable and cost-effective solution to their signalling infrastructure requirements. We provide our clients with a broad range of services encompassing construction of new interlockings and infrastructure, track and civil support, and supplementary labour hire. Our team have extensive experience across all regions of NSW and across all networks. We invest in our staff, our equipment, and our systems to ensure we are always able to deliver the safest and most reliable solution.

### Introduction:

At DB Rail, we are committed to conducting our business ethically, responsibly, and in compliance with all applicable laws and regulations, including those relating to modern slavery and human trafficking. We recognize the importance of addressing these issues and take our responsibility seriously to prevent and combat modern slavery in all its forms. This Modern Slavery Plan outlines our approach to identify and mitigate risks of modern slavery within our operations and supply chain, as well as our commitment to fostering a culture of respect, fairness, and human rights.

### Policy Statement:

DB Rail maintains a zero-tolerance policy toward modern slavery, forced labour, human trafficking, and any form of exploitation. We are dedicated to ensuring that all individuals associated with our company, including employees, contractors, suppliers, and other stakeholders, are treated with respect and dignity, and are not subjected to any form of slavery or forced labour.

DB Rail are committed to acting ethically and with integrity and transparency in its business undertakings and to implementing and enforcing controls to ensure modern slavery does not take place in our business or supply chain.

## Supply Chain and Risks:

DB Rails supply chain comprises of predominantly local suppliers based in Australia. These supplier's source and manufacture components wholly in Australia. As we operate and source locally in a low risks country DB Rail have determined our exposure to be very low.

As High-risk categories of services associated with modern slavery are typically engaged in low-skill manual tasks and non-technical or skilled labour hire providers such as service desk providers. Often without union representation or enterprise agreements and/or from disadvantaged backgrounds. These practices are an example of potential for unsafe work practices or exploitation.

High-risk categories for goods, materials and component spares are goods manufactured or sourced from overseas suppliers. This is particularly for suppliers without strong company policies and procedures or sourced from high-risk countries as defined by the Global Slavery Index.

DB Rail currently gain visibility into suppliers they engage to undertake assessment to ensure compliance with modern slavery legislation.

## Risk Assessment:

To manage, identify and assess the risk of modern slavery within our operations and supply chain, we will:

- Set clear guidelines for our suppliers.
- Conduct periodic risk assessments in collaboration with relevant stakeholders to identify areas of potential risk.
- Evaluate our business relationships, including suppliers, subcontractors, and business partners, to ensure they align with our commitment to combatting modern slavery.
- Analyse the geographic locations and industries associated with our supply chain for heightened risks of modern slavery. Including individually source components from suppliers.
- Consider relevant social, economic, and political factors that may contribute to modern slavery.

## Operational Risks:

Due to DB Rail being a localised operational structure and with the consideration to the fact that all our staff are professionals or technically qualified in a trade or higher, modern slavery risks are perceived to be very low within our business.

## Training and Education:

To ensure awareness and understanding of modern slavery issues, all employees, suppliers, and relevant stakeholders will receive training and/or consultation on the signs of modern slavery, how to report concerns, and the importance of maintaining a slavery-free supply chain.

## Reporting and Whistleblowing:

We will establish clear and confidential channels for reporting concerns related to modern slavery. Any employee, supplier, or stakeholder who suspects or witnesses potential modern slavery practices will be encouraged to report it promptly without fear of retaliation. All reports will be investigated and may be reported anonymously, in accordance with the complaints and whistleblowing procedures.

## Continuous Improvement:

DB Rail is committed to continuous improvement in our efforts to combat modern slavery. We will regularly review and update this Modern Slavery Plan to address new risks, challenges, and best practices in accordance with the Quality Management System (QMS).

## Collaboration and Transparency:

We will collaborate with industry peers, organizations, and government entities to share knowledge, best practices, and challenges in addressing modern slavery. Additionally, we will publish any amendments to our Modern Slavery Statement to communicate our progress and actions to stakeholders and the public.

## Breaches to the policy:

Where DB Rail becomes aware of a breach to the Modern Slavery Policy, management shall:

- Take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities in its supply chains; and
- Take all reasonable steps to remediate any adverse impacts caused or contributed to by the Supplier from these practices in accordance with the Guiding Principles on Business and Human Rights.

## Conclusion:

DB Rail is dedicated to upholding human rights, ensuring fair treatment for all, and taking a proactive stance against modern slavery. This Modern Slavery Plan represents our commitment to ethical business practices and the pursuit of a slavery-free supply chain. By working together and fostering a culture of responsibility and respect, we aim to create a better future for all.

## Endorsement:

This modern Slavery statement was approved by the Sole Director of DB Rail Pty Ltd on 11<sup>th</sup> August 2023.



David Bradley

Sole Director – DB Rail Pty Ltd

11/08/2023