

# Modern Slavery Statement

FY2024



# 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.



#### WE DELIVER WHAT MATTERS

# **pacific**national

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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 2024 (FY24). This Modern Slavery Statement (statement) responds to s16 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 2024.

#### **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 employee modern slavery awareness, modern slavery questionnaires, modern Slavery risk assessment and vendor management.

This statement has been endorsed by Pacific National's Audit and Risk Committee. It has been approved by the Pacific National 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 Paul Scurrah, Chief Executive Officer.

# **CEO Commitment**

At Pacific National we are committed to delivering what matters - for our people, customers, and our shareholders. We believe it is important to contribute to the long-term sustainability of the communities we operate in and provide our workforce with a safe, inclusive, and respectful workplace. This responsibility extends to prevention of modern slavery, exploitation, and human trafficking from our direct and indirect supply chains.

I welcome the opportunity to present our fifth Modern Slavery Statement, which outlines our efforts to assess and monitor risks of modern slavery in our supply chain and implement appropriate mitigating actions to safeguard our workforce.

We operate with integrity and transparency. Our governance structure, processes, and policy framework allow us to maintain the highest standards of corporate governance to comply with all local laws and regulations. This includes a focus on mitigating the risk of modern slavery in our operations and supply chain.

We are clear on the conduct and behaviours we expect of our workforce and ensure our employees can speak up against any misconduct. This expectation and approach is extended to our suppliers.

We continue to work on our approach to modern slavery risk management to further integrate it in our dayto-day business. In FY24, we made progress in a several areas identified as priorities for action:

- Developed a Procurement Framework to include modern slavery-specific risk assessments, supplier questionnaires, and ongoing risk monitoring.
- Developed our first Indigenous Procurement Strategy to diversify our supply base.
- Continued to upskill our procurement and commercial leaders who attended the Faculty Roundtable and Masterclass Programs.
- Developed a modern slavery training module scheduled for roll out in FY25.

This is my final Modern Slavery Statement as Pacific National's Chief Executive Officer. 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.

Paul Scurrah 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 and diverse customer base, servicing energy and resources, fast moving consumer goods, multi-national 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.

We are committed to protecting human rights and we are focused on refining our modern slavery risk management as our understanding of how to identify and address those risks further develops.





#### **The Pacific National Approach**

The Pacific National Approach (PNA) – our guiding principles – reinforces 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.



#### WE DELIVER WHAT MATTERS

# <u>pacific</u>national

# **Our Operations**



# Our Workforce

Pacific National employees oversee and implement strategy, operations and service delivery, property and finance, human resources, legal, and logistics activities. We employ 4,309<sup>1</sup> people across 70 sites in Australia. The majority of our workforce is in regional areas (55 percent), with the rest of our people located across Sydney, Melbourne, Brisbane, Adelaide, and Perth (45 percent). Around 78 percent of our workforce is engaged through permanent contracts, 3 percent through fixed-term contracts, while casual employees represent around 1.3 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 speak-up about discrimination, harassment, vilification, and abuse of all forms and take appropriate action to promote our people's health and well-being in all locations across Australia. Our values set the tone for how we work and set the standard for how others work with us.

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. A number of our people are employed in office-based roles in corporate functions such as 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 internal 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 2024 ESG Report in the Performance Data section on pages 70-74.

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

A summary of the most relevant data is provided below.

FY24 Workforce Profile		
Total employees		4309 <sup>2</sup>
	Permanent contract	3349
	Fixed-term contract	134
	Casual	58
Contingent workers		768 <sup>3</sup>
Percentage of employees covered by collective bargaining agreements		<b>74%</b> <sup>4</sup>



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

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

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

# **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 \$1.59 billion across 1381 suppliers.

Primary suppliers	Secondary suppliers
Primary suppliers are those we engage with directly. Our team procures goods and services that are essential to our operations, including fuel, access, 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.
Total Procurement Spend	~\$1.59bn
Primary suppliers	1381

Primary suppliers	1381
Top 50 primary suppliers based on spend	86%
Spend on suppliers in regional areas	~\$40 million
Australian suppliers based on spend	98 %
International suppliers based on spend	2%
Number of suppliers registered in Procurement risk management system (Avetta)	509
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 97 percent of our primary suppliers, with 3 percent of our supply chain based overseas. We engage overseas suppliers for some of our rollingstock procurement (four percent), Information Technology (IT) and communications spend (13 percent) and miscellaneous spend (3 percent). For categories of fuel, access to rail, labour hire, cleaning and accommodation, and PPE and safety equipment, all of our primary suppliers are based in Australia. 80 percent of our total procurement spend is in the categories of fuel, access to rail networks, and rollingstock. We engage 168 suppliers for procurement of these goods and services.

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, and fuel.

We continue to evolve our procurement process. We choose our supply partners carefully and are guided by our internal procurement policies and procedures.

Category	Percentage of total spend	Number of suppliers	Percentage of Australia-based suppliers	Percentage of overseas suppliers
Fuel	30.0	11	100	0
Access	26.0	22	100	0
Rollingstock	23.6	135	96	4
Labour hire (train crew and non-crew)	5.2	101	100	0
IT and communications	1.9	63	87	13
Cleaning/accommodation	1.3	83	100	0
PPE and safety equipment	0.1	4	100	0
Other (miscellaneous spend)	11.9	962	97	3

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

#### **Local and First Nations Procurement**

Our team aims to engage regional suppliers in Australia to support local communities wherever we can. A number of our top suppliers are based in Woolloongabba, 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.

Our procurement team developed Pacific National's first Indigenous Procurement Strategy to diversify our supply base. In FY24, Pacific National applied to become a member of Supply Nation which will enable us to connect and engage with First Nations owned businesses.

#### **Our Rollingstock**

In FY24, more than 20 percent of our total supplier spend was on rollingstock, including our locomotives and wagons. Most are built in Australia with parts sourced primarily from the USA, with some from New Zealand and Germany. Our new 94 Class locomotives are being built in Australia with major components such as engines and traction motors sourced from the USA. Pacific National's most recent wagon purchases were from an Australian 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.

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

# **Modern Slavery Governance**

#### **Our Governance Structure**

Our Board of Directors and Executive Leadership Team are dedicated to maintaining a high standard of corporate governance at Pacific National. Our governance structure promotes ethical and responsible business conduct. 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 ESG strategy, risks, metrics, and ESG related incentives, including modern slavery risk management.



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#### **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 FY24, we launched our Procurement Framework and Indigenous Procurement Strategy. We have updated our Code of Conduct, Supplier Code of Conduct and Request for Information Terms and Conditions, details of which are provided below.

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at Pacific National during the reporting period
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	All employees at Pacific National receive training on their obligations under the Code of Conduct.	
	As of 30 June 2024, 84 per cent of employees had completed the training with the remaining 16 per cent including new starters.	
		We have revised and updated our Code of Conduct to reflect changes to legislation.
Supplier Code of Conduct	The Pacific National Supplier Code of Conduct specifies the principles and expectations we have for our suppliers' behaviours and business practices, including modern slavery risks.	All suppliers to Pacific National are required to review and comply with the Supplier Code of Conduct.
		The Supplier Code of Conduct was updated to align with the updated Code of Conduct.
Compliance Framework and Policy	This policy outlines Pacific National's commitment and approach to implementing a compliance framework across all business operations. It describes the accountability structures to govern compliance management.	The policy ensures we comply with all applicable legal, regulatory, standards, codes, and licence requirements, including the Modern Slavery Act 2018 (Cth).
Risk Management Framework and Policy	The Pacific National Risk Management Policy establishes the context of risk management and aligns the company's defined risk tolerance and risk attitude.	The purpose of this policy and framework is to articulate the approach for an enterprise-wide risk management system at Pacific National.



Whistleblower Policy	Our Whistleblower Policy empowers employees, suppliers, and contractors to raise concerns regarding misconduct, or improper circumstances on a confidential basis. These concerns may include human rights abuses or forms of slavery. The Whistleblower Policy is supplemented by our Respect at PN policy which was updated in October 2023 to include new provisions around sexual harassment. In late 2023, we launched a new Speak Up policy that replaced our Grievance Resolution Policy and separated management of whistleblower complaints.	Directors, Executive and senior leaders receive training on the process for handling whistleblower complaints. In FY24, Pacific National received 30 whistleblower disclosures. None of these disclosures were related to modern slavery.
Procurement Framework	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.	The Procurement Framework was developed in FY24 and implemented in across our procurement activities. All Procurement activities abide with the Procurement Framework which includes modern slavery assessments and requirements as part of the evaluation before supplier selection.
Indigenous Procurement Strategy	Our Indigenous Procurement Strategy includes our approach to increasing engagement with First Nations suppliers in our procurement activities.	In FY24, our procurement team developed Pacific National's first Indigenous Procurement Strategy to diversify our supply base. In FY24, we applied to Supply Nation to become a member, which will enable us to connect and engage with First Nations owned businesses.
Request for Information and Purchase Order Terms and Conditions	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.	Our Legal and Procurement teams updated the terms and conditions linked to any Request for Information issued to vendors. These terms now specifically include provisions around Modern Slavery and adherence to our Supplier Code of Conduct. Our Purchase Order terms and conditions were also updated to include modern
		slavery-related and anti-corruption clauses applicable to both our company and our suppliers.

# Modern Slavery Risks

Pacific National acknowledges the risk that modern slavery may be present in our operations and supply chain.

#### **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 in place 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.
- As part of Induction process, all new employees complete training on the Respect at Pacific National and Code of Conduct Policies.
- 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 several programs implemented to increase representation of women, LGBTQIA+, and people with disabilities.
- We developed a modern slavery training module scheduled for roll out in FY25.

#### Our Supply Chain

We acknowledge that we can be contributing 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 in those locations. Modern slavery risks associated with these products include child labour, forced labour, and debt bondage.

We apply a risk-based approach to identifying modern slavery risks in our supply chain. Our aim is to continually assess modern slavery risks associated with our company as our operating environment changes, impacting our supply chain and business relationships.

In FY24, we reassessed the results of our FY23 modern slavery risk assessment using the Global Slavery Index. We evaluated 50 of our top suppliers to categorise the risk profile as high, medium, or low. Our team considered actual and potential human rights impact in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We applied risk ratings against 24 suppliers previously uncategorised, of whom two are now rated as high risk.

Areas of focus determined through the assessment include:

- High risk categories where our procurement spend was considered material. This included fuel supply, where there is a potential risk to Pacific National of indirect association with modern slavery practices.
- High risk categories where the goods or services were procured in Australia included labour hire organisations, cleaning, and security services.
- High risk categories where we had a direct commercial relationship with the supplier (primary suppliers) over extended supply chains (including secondary suppliers).

We regularly engage with our primary suppliers to assess modern slavery risk management practices. Given the complexity of our supply chain, we do not have visibility over our secondary suppliers to the same extent as our primary suppliers. We are working on gaining greater transparency beyond our direct suppliers to better understand the risk of modern slavery practices in our supply chain.

We monitor our relationships with labour hire organisations. These suppliers primarily provide cleaning and garden maintenance services. We also outsource IT, project management and recruitment to deliver support to our corporate services. We choose reputable suppliers with a strong presence in Australia and maintain a robust ongoing relationship with these entities. Three suppliers that provide train crew labour account for 90% of the spend related to labour hire.

# Actions Taken

#### **Procurement Framework**

We developed a Procurement Framework to standardise our 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.

#### Indigenous Procurement Strategy

Our procurement team developed Pacific National's first Indigenous Procurement Strategy to diversify our supply base. We have applied to Supply Nation to become a member, which will enable us to connect and engage with First Nations owned businesses.

#### Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement Certification

This year our team again partnered with the Procurement Institute to obtain Ethical Procurement Certifications as part of our mandatory training program. It strengthens Pacific National's ability to deliver best practice ethical procurement and supports our commitment to improved social outcomes throughout our third-party supply chain.

CIPS is a globally recognised accreditation and membership organisation and is instrumental in driving change, sustainability, and best practice across the procurement sector. The certification is globally recognised and equips individuals and organisations to embed sustainable ethical processes, practices, and standards across all procurement activity.

This annual certification strengthens Pacific National's ability to deliver best practice ethical procurement activity and supports Pacific National's ongoing commitment to deliver improved social outcomes throughout our third-party supply chain.

#### The Faculty Roundtable and Masterclass Program

Our procurement and commercial leaders attended the Faculty Roundtable and Masterclass Programs, conducted by Procurious to develop skills in sustainable, social, Indigenous procurement, gender diversity, and carbon literacy. These education programs allow our team members to share experiences and insights and learn from industry leaders.

#### **Request for Information Terms and Conditions update**

Our Legal and Procurement teams updated the terms and conditions linked to any request for information issued to vendors to specifically include provisions around modern slavery. Our terms and conditions also include adherence to our refreshed Supplier Code of Conduct. Pacific National's procurement spend platform, Coupa, assists us in monitoring acceptance of the new terms. Our purchase order terms and conditions were also updated to include modern slavery-related and anti-corruption clauses applicable to both our company and our suppliers.

# **Effectiveness of Actions**

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

**Education** – The addition of CIPS Ethical Procurement Certification has equipped our procurement team with necessary skills and knowledge to embed sustainable ethical procurement processes when engaging third-party suppliers and better manage modern slavery risks.

**Awareness** – the provision of appropriate materials to suppliers and employees about Pacific National's approach to modern slavery and access to grievance procedures for reporting purposes. All employees, contractors, customers, and suppliers to Pacific National were given access to relevant information in FY24.

**Feedback** – action taken in response to any feedback received from internal and external stakeholders as to the effectiveness of actions taken to identify, manage and mitigate modern slavery risks.

**Supplier engagement** – in total we have assessed 509 suppliers via the Avetta supply chain management and assessment platform. 89 percent of Avetta registered suppliers completed our modern slavery assessment questionnaire, improving supply chain management and in particular, access to information on lower value expenditure suppliers.

**Mitigation** – the timeliness of actions where any grievances have been reported or breach of policies identified. No grievances or breaches were reported in FY24. Ethical procurement practices and responsible sourcing, including modern slavery considerations, have been incorporated into Pacific National's ESG program since FY22 and their performance will also be monitored through the delivery of our ESG strategy.

# **Our Focus for the Next Year**

In the next year, we will focus on expanding our modern slavery-related risk assessment action and engaging with an expanded number of our suppliers.

#### **Education and Awareness**

• Increase modern slavery awareness and risk mitigation practices internally by refreshing materials available to Pacific National employees via our intranet and social networking platform.

#### Supply Chain and Operations

- Automate the assessment requirements relating to supplier modern slavery risk during the tender process.
- Maturing practices related to supplier modern slavery assessment upon engagement of suppliers.
- Continue risk profiling primary suppliers.
- Establish a contract management framework which focuses on risk management, innovation, performance management and contract compliance.

#### **Internal Reporting**

• Modern slavery reporting from Avetta to be provided to Pacific National ESG Team and Executive Leadership Team.

#### **Update Recruitment Procedure**

• To include additional requirements on rights to work, minimum working age and child labour.

# Mandatory Criteria

	dern Slavery Statement ndatory Criteria	Section reference	Page
1.	Identify the reporting entity	About this statement	3
<ol> <li>Describe the reporting entity's structure,</li> </ol>		About Pacific National	
	operations, and supply chains.	Our Operations	
		Our Workforce	5 - 13
		Our Supply chain	
		Our Modern Slavery Governance	
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	16
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	Actions Taken	18
	processes.		
5.	Describe how the reporting entity assesses the effectiveness of such actions	Effectiveness of Actions	19
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 106978 330 Pty Ltd	Subsidiary of the ultimate holding company