

**Carmichael Rail Holdings Pty Ltd**

**and**

**Carmichael Rail Pty Ltd**

**Modern Slavery Statement**

Reporting year ended 31<sup>st</sup> March 2024

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## 1. Introduction

This Modern Slavery statement is for Carmichael Rail Holdings Pty Ltd A.C.N. 601 738 827 (**CRHPL**), and Carmichael Rail Pty Ltd A.C.N. 601 873 492 (**CRPL**) (together the “**CR Group**”), which are reporting entities under the *Modern Slavery Act 2018* (Cth) (the “**Act**”). This is the joint statement for the CR Group.

The CR Group is part of the global **Adani Group**. Both the CR Group and the Adani Group are committed to combating the risk of modern slavery in our supply chains and in any part of our business.

As one of the goals of the Adani Group is to act with integrity, we strive to act fairly, ethically, and openly in everything that we do. The CR Group is committed to:

- Operating its business in accordance with the Modern Slavery Act 2018 (Cth).
- Ensuring our people understand modern slavery and the risk it presents to our operations.
- Providing our people with appropriate avenues for reporting potential instances of modern slavery within our operations, or the operations of our suppliers and/or clients.
- Mitigating modern slavery risk within our operations.
- Eliminating potential and/or actual modern slavery practices from our operations and supply chain
- Ensuring appropriate transparency with our people, clients, suppliers, and stakeholders regarding the maturity of our modern slavery due diligence process and the findings arising from this.
- Enhancing our plan for measuring the effectiveness of our existing modern slavery risk framework.

This Modern Slavery statement is prepared in accordance with the Act and describes the risks of Modern Slavery within the CR Group. It outlines the steps we have taken, and the next steps to be completed during the financial year (ended 31 March 2024) to identify, manage and mitigate the risks in our operations and supply chains.

For the purposes of this statement, references to ‘we’, ‘us’ and ‘our’ collectively refer to the CR Group and the reporting entities covered by the statement.

## 2. Modern Slavery Law

The Act identifies seven (7) relevant mandatory criteria (**Mandatory Reporting Criteria**) that the CR Group’s Modern Slavery statement must address, as follows:

- a) identify the reporting entity;
  - b) describe the reporting entity’s structure, operations and supply chains;
  - c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity;
  - d) describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes;
  - e) describe how the reporting entity assesses the effectiveness of these actions;
  - f) describe the process of consultation with any entities that the reporting entity owns or controls; and
  - g) any other information the reporting entity considers relevant.
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### 3. Mandatory Reporting Criteria

#### 3.1. Identity of reporting entity

This is the joint Modern Slavery statement for the CR Group which comprises of the following two (2) Australian registered companies:

- Carmichael Rail Holdings Pty Ltd A.C.N. 601 738 827 (**CRHPL**); and
- Carmichael Rail Pty Ltd A.C.N. 601 873 492 (**CRPL**).

Each of CRHPL and CRPL are Australian proprietary companies, registered in Queensland, and with their respective registered offices at Level 9, 120 Edward Street, Brisbane Queensland 4000.

#### 3.2. Describe the reporting entity's structure, operations and supply chains

##### Structure

CRHPL is an Australian proprietary company established in 2014 and based in Brisbane, Queensland. CRHPL is wholly owned by Carmichael Rail Singapore Pte Ltd (a proprietary company registered in Singapore).

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The CR Group is CRHPL is wholly owned by Carmichael Rail Singapore Pte Ltd (a proprietary company registered in Singapore). and is part of the **Adani Group** of diversified Australian businesses (known as "**Bravus**") delivering integrated energy and infrastructure services. Bravus has been in Australia for more than a decade, bringing investment, new ways of operating, and working with communities since 2010.

##### Operations

The CR Group is principally engaged in providing support for the Carmichael Rail Network project (a 200km rail line in the Galilee Basin) developed by the Carmichael Rail Network Trust (**CRNT**). CRNT supports the reliable and affordable energy mix of the future by transporting high-quality Australian coal for export to nations around the world that want to lift their people out of energy poverty.

During the year, the CR Group's primary activities were to obtain and provide loans facilities to related parties.

##### Supply chains

As noted above, the CR Group's principal supply chain consists of CRNT, and other entities within the Bravus group and wider Adani Group generally, of which are also subject to and comply with the Modern Slavery regime. The CR Group has an extremely limited and narrow commercial supply chain outside of the Adani Group (of which, the majority operate within Australia).

#### 3.3. Risks of modern slavery practices in the operations and supply chains of the reporting entity

As noted above, the CR Group has an extremely limited and narrow commercial supply chain, of which principally consists of CRNT and other entities within the Bravus group and wider Adani Group generally, which are also subject to and comply with the Modern Slavery regime. On this basis, and given the nature of its operations is the provision of loan facilities to related parties, the risk of Modern Slavery in the CR Group's operations and supply chain is assessed as low.

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### **3.4. Actions taken by the reporting entity to assess and address the above risks, including due diligence and remediation processes**

#### **Supply chain due diligence**

The suppliers within the CR Group's narrow supply chain are subject to contract reviews (at regular intervals) and executive meetings (as required), which provides opportunity to raise the Modern Slavery awareness and discuss the risks associated with it.

Additionally, the CR Group has finalised the development of a Supplier Modern Slavery Questionnaire, which will be issued to our primary suppliers.

The purpose of this Supplier Modern Slavery Questionnaire is to ensure all our major business partners and supply chain stakeholders are aware of their own responsibilities and those of the CR Group with respect to managing the risk of modern slavery in the supply chain and to elicit information that the CR Group will use to ensure compliance and assess modern slavery risks within its supply chain.

This questionnaire will be reviewed by our internal stakeholders including the Commercial operations team to ensure we understand our exposure and mitigate the Modern Slavery Risk in our supply chain.

#### **Modern Slavery Awareness Guide**

The CR Group is committed to ensuring that our people and suppliers understand what Modern Slavery is and the key role they play in delivering on our commitments.

To support the education of our employees, a guide will be created to provide an overview of local and global modern slavery trends in related industries and the types of risks our business should be considering. The guide will also provide a tailored view of the legislation applicable to the CR Group, how we deliver on our commitment to the underlying principles, and outline the key commitments in our reporting.

#### **Supply Chain Management and Supplier On-Boarding Processes**

The CR Group has commenced a review of its Standard Purchase Contract and Standard Service Contract with a view to refining templates in relation to the Modern Slavery compliance obligations for our direct suppliers within our narrow supply chain. This review, while something that will always be evolving, has progressed, and the standard suite contracts now include Modern Slavery compliance clauses that oblige the counterparty to take reasonable actions and measures to identify, assess and address the risk of modern slavery practices within the supply chains used in connection with the contract.

In the event the Supplier or Contractor becomes aware of any such practices, that party must take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities within its supply chains.

#### **Remediation: Grievances and Complaints**

The CR Group has a Whistleblowing Policy in place with the reporting route available for both internal and external reports to raise concerns about compliance obligations, corporate governance, bullying and harassment, including any complaint or concern regarding our Modern Slavery obligations.

The Board and senior management encourage everyone who works with the CR Group to speak up and report any conduct they believe to be inappropriate. We are committed to ensuring that individuals who disclose can do so safely, securely and with confidence that they will be protected and supported.

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Our dedicated Whistleblowing Hotline is one of those formal channels. This service is available to any individual who is, or has been a director, employee, secondee, contractor, consultant, supplier, service provider (or their employee or subcontractor), associates of the CR Group and relatives, spouses, dependents of these individuals.

The Whistleblowing Policy is regularly reviewed and updated to ensure an effective and transparent grievance process and compliance with relevant laws.

### **Policies and Guideline**

The CR Group takes guidance from the Adani Group policies and code of conduct (the “**Guidelines**”). The Guidelines require Adani Group entities and its people to conduct business in a manner that respects human rights, employees and contractors treat each other with dignity, respect, and consideration at all times and do not involve modern slavery practices.

All procurement engagements for the business are required to demonstrate that the spending of the company funds is justified, is done so in accordance with the Guidelines, achieves the best value, and is fit for purpose.

The Guidelines also prohibit discrimination, based on any protected attribute under the law. Our employees and contractors are required to understand and adhere to the Guidelines throughout their employment or engagement.

The objective of the Guidelines is to ensure that the procurement of all goods and services is conducted in an honest, competitive, full, fair, reasonable, transparent, and ethical manner.

### **3.5. How the reporting entity assesses the effectiveness of the above actions**

To date, the CR Group has not become aware of any occurrences where a supplier has engaged in practices in breach of their modern slavery obligations.

Notwithstanding the above, in order to assess the effectiveness of its actions, the CR Group shall conduct reviews on the following areas:

- Procurement & supply chain:
  - review of percentage of contracts which include modern slavery clauses; and
  - review of percentage of major suppliers completing the modern slavery questionnaire.
  
- Grievances and reporting:
  - review of number of modern slavery cases identified and remediated.
  
- Reviews of the CR Group’s obligations to ensure that Modern Slavery processes are being complied with.

Further to the above, the CR Group undertakes a continual process of improving the way it distributes information, and implements training, to key staff involved in the procurement and engagement of contractors, consultants, and suppliers in order to ensure such staff are aware of the measures that are currently in place, and those that are to be implemented.

The CR Group is committed, and continues, to develop processes to assess the effectiveness of the actions taken by it and our suppliers to respond to modern slavery risks with respect to supply chains and operations.

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### **3.6. The process of consultation with any entities that the reporting entity owns or controls**

The CR Group consulted with the key leadership team members in preparing this Modern Slavery Statement and circulated a draft of this Statement for review and comment, prior to it being put to the Board of Directors for final review and approval.

### **3.7. Any other relevant information**

The CR Group is continuing to develop and implement an improved framework to assess and monitor the Modern Slavery risks in our operations and supply chain.

The CR Group recognises that the risks of modern slavery are complex and evolving. We will continue to work to identify and address these risks in our business and engage with a range of stakeholders, to assess the effectiveness of our actions and enhance our approach.

## **4. Reporting Entity Board Approval**

This Modern Slavery Statement was approved by the Board of Directors for each of CRHPL and CRPL on 8 November 2024.

## **5. Reporting Entity Signature of Responsible Member**

A handwritten signature in black ink, appearing to read 'S. Vora', with a horizontal line drawn underneath it.

Samir Vora

Director

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