

DB Rail Pty Ltd

ST-01 Modern Slavery Statement

Financial Year 2025/2026

Voluntary statement addressing the mandatory criteria of section 16 of the Modern Slavery Act 2018 (Cth), and aligned to the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps

Document No.	ST-01	Revision	3.0
Issue Date	August 2026	Next Review	July 2027
Reporting Period	1 July 2025 – 30 June 2026 (FY 2025/2026)	Submission Type	Voluntary
Prepared By	Michael Cook — HSEQ Manager	Approved By	David Bradley — Director
Classification	Uncontrolled When Printed	Applies To	DB Rail Pty Ltd and its supply chain

This document is uncontrolled when printed. Refer to SharePoint for the current version.

Document Review Table

Version	Reviewed By	Title	Date	Comments
1.0	David Bradley	Sole Director	11/08/2023	Statement for FY 2022/2023; published to the Modern Slavery Statements Register 20/09/2023
2.0	Michael Cook	Operations Manager	May 2026	Statement for FY 2024/2025 rebuilt onto the DB Rail house-style template and restructured to address all seven mandatory criteria of s.16 Modern Slavery Act 2018 (Cth); brought under IMS document control as ST-01
3.0	Michael Cook	HSEQ Manager	August 2026	Statement for FY 2025/2026. Records delivery of the four FY 2024/2025 forward commitments; effectiveness indicators presented in tabular form with results; new Section 8.3 Regulatory Developments (Commonwealth reform announcement 16 July 2026; NSW Procurement Board Direction PBD-2025-05); new Annexure B mapping DB Rail arrangements to the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps; ABN inserted; PO-09 Modern Slavery and Ethical Sourcing Policy referenced

Note: DB Rail has submitted a voluntary modern slavery statement to the Modern Slavery Statements Register for each financial year. The Document Review Table records revisions to the controlled ST-01 document; statements issued before ST-01 was brought under Integrated Management System document control are not individually recorded above.

1. About this Statement

DB Rail Pty Ltd (DB Rail) is committed to acting ethically and with integrity in all of its business dealings and to taking reasonable steps to ensure that modern slavery is not occurring in its operations or supply chains.

DB Rail is not a reporting entity under section 5 of the Modern Slavery Act 2018 (Cth). Its annual consolidated revenue is below the AU\$100 million reporting threshold, which remains unchanged at the date of this statement. This statement is therefore submitted on a voluntary basis under section 6 of the Act. DB Rail considers it important to publicly demonstrate its commitment to addressing modern slavery and has elected to address in full the mandatory criteria set out in section 16(1) of the Act so that this statement can be published on the Australian Government's Modern Slavery Statements Register.

DB Rail's principal clients are New South Wales Government agencies which carry obligations under the Modern Slavery Act 2018 (NSW) and section 176 of the Public Works and Procurement Act 1912 (NSW). This statement has accordingly been prepared to support those clients' supplier due diligence, and Annexure B maps DB Rail's arrangements to the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps.

This statement covers DB Rail Pty Ltd for the reporting period 1 July 2025 to 30 June 2026. DB Rail does not own or control any other entities.

DB Rail submits a voluntary modern slavery statement to the Modern Slavery Statements Register annually. DB Rail maintains an annual cycle under which each statement is prepared, approved by the Director as the principal governing body, and published within six months of the end of the reporting period. This statement covers the financial year 2025/2026 and supersedes all previous statements.

2. Identification of the Reporting Entity

This statement is given by:

Legal name	DB Rail Pty Ltd
Trading name	DB Rail
ACN	616 580 940
ABN	54 616 580 940
Registered office	3.07, 46-50 Kent Road, Mascot NSW 2020, Australia
Entity type	Proprietary limited company
Country of incorporation	Australia
Reporting period	1 July 2025 – 30 June 2026
Submission basis	Voluntary — DB Rail is below the AU\$100 million revenue threshold in s.5 of the Modern Slavery Act 2018 (Cth)
Owned or controlled entities	None

Mandatory criterion addressed: s.16(1)(a)

3. Structure, Operations and Supply Chains

3.1 Structure

DB Rail Pty Ltd is an Australian proprietary limited company incorporated under the Corporations Act 2001 (Cth) and headquartered in Mascot, New South Wales. The company is privately owned. Its principal governing body is the sole Director, David Bradley. DB Rail has no subsidiaries, joint ventures, or other entities that it owns or controls. The company operates exclusively in Australia and predominantly in New South Wales.

3.2 Operations

DB Rail is a specialist railway signalling electrical contractor providing services to Rail Infrastructure Maintainers (RIMs) and Rail Transport Operators. The company's services include:

- Installation, construction and commissioning of new railway signalling infrastructure, including interlockings, signals, points, level crossings, track circuits and associated equipment.
- Preventative and corrective maintenance of railway signalling assets in accordance with network operator Technical Maintenance Plans.
- Renewals and defect rectification works on existing signalling infrastructure.
- Signalling support services including track and civil support, fault-finding, testing and certification.
- Supplementary labour-hire to client signalling teams.

Principal clients during the reporting period included Sydney Trains / Transport for NSW (TfNSW), the Australian Rail Track Corporation (ARTC), NSW Ports and other rail infrastructure stakeholders. All work is performed in Australia.

DB Rail's workforce comprises direct employees and a small number of engaged subcontractors. All workers are based in Australia and are employed or engaged in accordance with the Fair Work Act 2009 (Cth), the relevant Modern Award, and the Work Health and Safety Act 2011 (NSW).

3.3 Supply Chains

DB Rail's supply chain is small, predominantly Australian, and substantially shaped by client procurement requirements. Categories of goods and services procured during the reporting period included:

- Signalling components, cables, relays and trackside equipment — most of which are supplied by, or procured to type-approved specifications of, the relevant Rail Infrastructure Maintainer (e.g. TfNSW, ARTC).
- Electrical materials and consumables sourced from Australian electrical wholesalers.
- Tools, plant, vehicles and personal protective equipment.
- Chemicals and consumables (PVC cement, cable lubricant, silicone, etc.) supplied by Australian distributors.
- Professional services — accounting, legal, insurance, training, certification, telecommunications and information technology.
- Subcontracted specialist labour engaged on a project basis.

DB Rail maintains an Approved Supplier List (managed through PR-38 Subcontractor Management Procedure and FM-19 Contractor Evaluation Tool). The majority of DB Rail's direct (Tier 1) suppliers are Australian-based businesses. DB Rail does not directly import goods and does not engage suppliers located in higher-risk countries. DB Rail acknowledges that Tier 2 and lower-tier suppliers of manufactured goods (for example, electrical components) may have international supply chains over which DB Rail has limited direct visibility.

Mandatory criterion addressed: s.16(1)(b)

4. Modern Slavery Risks in Operations and Supply Chains

In assessing modern slavery risk, DB Rail considers the four risk indicators identified in the Commonwealth guidance for reporting entities (Guidance for Reporting Entities, Australian Border Force): sector and industry risk, product and services risk, geographic risk, and entity risk. DB Rail also has regard to the Inherent Risk Identification Tool published by the Office of the NSW Anti-slavery Commissioner when categorising the inherent modern slavery risk of the goods and services it procures. “Modern slavery” is used in this statement as defined in section 4 of the Modern Slavery Act 2018 (Cth) and includes the conduct described in Divisions 270 and 271 of the Criminal Code (Cth).

4.1 Operational Risk

DB Rail assesses the risk of modern slavery within its own operations as low, on the following basis:

- All workers are employed or engaged in Australia under the Fair Work Act 2009 (Cth) and applicable Modern Awards or Enterprise Agreements.
- The workforce is small, specialised and predominantly qualified — workers hold trade qualifications, electrical licences and rail safety worker (RSW) competencies.
- Rail safety legislation and Rail Industry Worker (RIW) competency processes provide structural oversight of worker identity, qualifications and fitness for work.
- Workers are inducted, briefed at toolboxes, and have access to formal mechanisms for raising concerns (PR-05 Just, Fair and Reasonable Conduct Procedure; FM-07 Continuous Improvement / Incident Form).
- No low-skill labour-hire arrangements involving vulnerable cohorts (such as migrant workers on visa restrictions) are used.

4.2 Supply Chain Risk

DB Rail assesses the risk of modern slavery in its direct (Tier 1) supply chain as low, recognising that residual risk exists in lower tiers of certain product supply chains. The principal areas of residual risk identified are:

- Manufactured electrical and signalling components which may incorporate raw materials, sub-components or assembly operations sourced from countries identified as higher-risk by the Global Slavery Index (e.g. electronic componentry, copper, certain plastics and rubber).
- Personal protective equipment and workwear, where global garment supply chains are recognised as carrying elevated modern slavery risk.
- Information technology hardware and consumer electronics.
- Cleaning, waste and facilities services engaged through commercial landlords, which can include labour-hire arrangements with vulnerable workforces.

DB Rail acknowledges that its direct procurement leverage in these areas is limited because most signalling materials are type-approved by, and frequently supplied directly through, the relevant Rail Infrastructure Maintainer.

Applying the Inherent Risk Identification Tool to DB Rail’s procurement profile, the categories carrying the highest inherent modern slavery risk are electrical and electronic componentry, personal protective equipment and workwear, and information technology hardware. These categories are procured in low volumes and, in the case of signalling componentry, predominantly through client-mandated type-approval arrangements.

4.3 Geographic and Sector Risk

All of DB Rail's operations and direct supplier relationships are located within Australia, which is assessed as a low-risk jurisdiction for modern slavery. The rail infrastructure sector in Australia is highly regulated and subject to oversight by the Office of the National Rail Safety Regulator (ONRSR) and state-based rail safety regulators.

Mandatory criterion addressed: s.16(1)(c)

5. Actions Taken to Assess and Address Risks

During the reporting period 1 July 2025 to 30 June 2026, DB Rail undertook the following actions to assess and address modern slavery risks in its operations and supply chains. Each of the four forward commitments made in the FY 2024/2025 statement was delivered during the period; delivered commitments are marked below.

5.1 Governance and Policy

- Maintained DB Rail's zero-tolerance position on modern slavery — including forced labour, servitude, debt bondage, deceptive recruiting, human trafficking and the worst forms of child labour — across the Integrated Management System policy framework.
- Retained modern slavery risk as a recorded risk in the Risks and Opportunities Register (FM-39) and as a stakeholder expectation in the Needs and Expectations Register (FM-36).
- Reviewed modern slavery risk, supplier performance and this statement at management review (FM-09), with the Director accountable as the principal governing body.
- Maintained all modern slavery documentation under IMS document control, registered in FM-21 IMS Document Control Register.

5.2 Due Diligence on Suppliers and Subcontractors

- Delivered — reviewed the Approved Supplier List and revised the supplier prequalification questionnaire (FM-60 Subcontractor Pre-Qualification Assessment) to include explicit modern slavery questions for all new suppliers and subcontractors.
- Delivered — incorporated standard modern slavery clauses into subcontractor agreements where DB Rail is the contracting principal, addressing compliance, flow-down to lower-tier suppliers, access to information and cooperation in remediation.
- Maintained pre-qualification of subcontractors under PR-38 Subcontractor Management Procedure, and evaluated engaged subcontractors using FM-19 Contractor Evaluation Tool, which includes review of safety, quality and labour compliance documentation.
- Applied purchasing and supplier controls under PR-01 Purchasing Procedure, PR-11 Supplier Management Procedure and the purchase order terms and conditions at PR-18.
- Continued to procure type-approved signalling materials principally through, or to specifications mandated by, Rail Infrastructure Maintainers (Sydney Trains / TfNSW, ARTC), each of which operates its own supply chain governance arrangements.
- Maintained participation in the Avetta and Rail Industry Worker prequalification platforms used by major clients, including completion of supplier compliance modules covering ethical sourcing and modern slavery.

5.3 Workforce Protections

- Delivered — refreshed worker induction content (FM-05 Induction Checklist) to include a dedicated module on modern slavery indicators and how to report concerns.
- Inducted all workers and subcontractors into DB Rail's policy framework and reporting mechanisms, and reinforced awareness through toolbox talks recorded on FM-04.
- Managed and verified worker competency, identity and right to work through the Rail Industry Worker (RIW) Programme under PR-13 Competency Management Procedure, recorded in FM-32 Competency Matrix and Registers.
- Paid all workers in accordance with the Fair Work Act 2009 (Cth) and the relevant Modern Awards. Working hours, fatigue and breaks were managed under the SMS Plan (Section 3.7 — Fatigue Management).

5.4 Reporting and Grievance Mechanisms

- Maintained multiple avenues for workers, subcontractors, suppliers and members of the public to raise concerns — including direct reporting to the HSEQ Manager or the Director, and submission of an FM-07 Continuous Improvement / Incident Form. Concerns may be raised anonymously.
- Recorded and tracked all reported concerns to closure in the Continuous Improvement Register (FM-08).
- Maintained the protections set out in PR-05 Just, Fair and Reasonable Conduct Procedure, which prohibits reprisals against any person who raises a concern in good faith.
- Provided workers with stop-work authority, supported by PR-28 Stop Work Authority Procedure.
- Retained external avenues for reporting, including the Fair Work Ombudsman, SafeWork NSW and the Australian Federal Police.

5.5 Monitoring of Regulatory Developments

- Delivered — monitored the Australian Government's response to the statutory review of the Modern Slavery Act 2018 (Cth) (the McMillan Review), confirming that the AU\$100 million reporting threshold in section 5 remains unchanged.
- Monitored the Initial Position Paper published by the Office of the Australian Anti-Slavery Commissioner in January 2026 recommending reforms to strengthen the Act.
- Monitored NSW Procurement Board Direction PBD-2025-05, which from 1 July 2026 requires NSW Government agencies to apply heightened due diligence tender clauses to procurements categorised as high modern slavery risk, and assessed the implications for DB Rail as a supplier to those agencies.

5.6 Remediation

DB Rail commits to taking the following steps in the event that any actual or suspected instance of modern slavery is identified in its operations or supply chains:

- Cease, prevent or mitigate the harm in cooperation with the affected worker(s) and relevant authorities;
- Investigate the matter through the continuous improvement process (FM-07/FM-08) and document the findings;
- Provide for, or cooperate in, remediation in accordance with the United Nations Guiding Principles on Business and Human Rights;
- Report the matter to relevant authorities, including the Australian Federal Police (national hotline 131 AFP) and the Australian Anti-Slavery Commissioner where appropriate; and
- Review and update DB Rail's risk assessment, controls and supplier arrangements to reduce the risk of recurrence.

No actual or suspected instance of modern slavery was identified in DB Rail's operations or supply chains during the reporting period, and no modern-slavery-related concern or complaint was raised through any internal or external reporting or grievance channel.

Mandatory criterion addressed: s.16(1)(d)

6. Assessing the Effectiveness of Actions

DB Rail assesses the effectiveness of its actions to address modern slavery risk through the following mechanisms:

- Annual review of this statement and the underlying modern slavery policy position by the Director and the HSEQ Manager.
- Inclusion of modern slavery risk in the annual Management Review Meeting (FM-09), which considers the Risks and Opportunities Register (FM-39), supplier performance and the Continuous Improvement Register (FM-08).
- Internal audits of the Integrated Management System (typically annually) performed under the QMS, SMS and EMS, which include review of supplier management and worker engagement controls.
- Tracking of complaints, grievances and incidents reported under FM-07 / FM-08, none of which related to modern slavery during the reporting period.
- Monitoring of completion of induction training (FM-05) and review of toolbox talk records (FM-04) for ongoing awareness of worker rights and reporting avenues.
- Participation in client and platform-based prequalification reviews (e.g. Avetta), where DB Rail's compliance status is periodically verified by independent third parties.

DB Rail measures the effectiveness of these actions against the indicators set out below. Results shown are for the reporting period 1 July 2025 to 30 June 2026.

Indicator	Target	FY 2025/2026 result
Modern-slavery-related complaints or concerns received	0, with every report investigated and closed out	0 — no concern or complaint raised
New suppliers and subcontractors prequalified before engagement	100%	100%
Supplier prequalification questionnaires (FM-60) containing explicit modern slavery questions	100% of new suppliers and subcontractors	100% — FM-60 revised during the period
New subcontractor agreements executed by DB Rail as principal containing modern slavery clauses	100% of new agreements	100% — standard clauses adopted during the period
Workers and subcontractors completing induction (FM-05) including modern slavery content	100%	100% — induction content refreshed during the period
Modern slavery risk reviewed at management review (FM-09)	At every management review	Achieved
Currency of ST-01 and the underlying policy position	Reviewed and approved annually, within six months of the end of the reporting period	Achieved — reviewed and approved August 2026

DB Rail acknowledges that the absence of identified incidents does not, by itself, demonstrate that modern slavery is not present in the deeper tiers of its supply chains. The company will continue to mature its assessment and assurance arrangements over time.

Mandatory criterion addressed: s.16(1)(e)

7. Consultation with Owned or Controlled Entities

DB Rail Pty Ltd does not own or control any other entities. Section 16(1)(f) of the Modern Slavery Act 2018 (Cth) is therefore not applicable to this statement. Within DB Rail, the development of this statement was led by the HSEQ Manager in consultation with the Director, and the content was reviewed and endorsed by the Director as the principal governing body.

Mandatory criterion addressed: s.16(1)(f)

8. Other Relevant Information

8.1 Integration with the Integrated Management System

DB Rail operates an Integrated Management System (IMS) certified to ISO 9001:2015 (Quality), ISO 45001:2018 (Occupational Health and Safety) and ISO 14001:2015 (Environment) by a JAS-ANZ accredited certification body. The IMS provides the policy, procedure and document control framework within which DB Rail manages worker rights, supplier governance and continuous improvement. This statement should be read alongside the SMS Plan, the QMS Plan and the supporting procedures and forms referenced in Section 10 below.

8.2 Related Frameworks and Commitments

In addition to the Modern Slavery Act 2018 (Cth), DB Rail recognises and aligns its approach with:

- The United Nations Guiding Principles on Business and Human Rights.
- Core International Labour Organization (ILO) conventions on forced labour, child labour, freedom of association and discrimination.
- The Fair Work Act 2009 (Cth) and applicable Modern Awards.
- The Rail Safety National Law (NSW) and associated regulations, and the supply-chain compliance requirements of Sydney Trains / Transport for NSW, ARTC and other client networks.
- The NSW Anti-slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains (effective 1 January 2024) and the NSW Government Supplier Code of Conduct.
- ISO 20400:2017 Sustainable Procurement — Guidance and AS/NZS ISO 31000:2018 Risk Management — Guidelines.

8.3 Regulatory Developments

DB Rail monitors developments in the Commonwealth and New South Wales modern slavery frameworks that may affect its own position or its clients' expectations of it as a supplier. At the date of this statement:

- The reporting threshold in section 5 of the Modern Slavery Act 2018 (Cth) remains AU\$100 million. The statutory review of the Act recommended reducing it to AU\$50 million; that recommendation has not been legislated. DB Rail remains below both figures.
- On 16 July 2026 the Australian Government announced its intention to introduce a criminal offence for reporting entities that fail to prevent modern slavery in their supply chains, with a defence available where reasonable steps were taken, together with civil penalties and enforcement powers for non-compliance with the existing reporting obligations. The proposed offence is directed at entities above the AU\$100 million threshold and would not apply to DB Rail at its current revenue. DB Rail nonetheless expects the associated "reasonable steps" expectations to flow down through client contracts.
- NSW Procurement Board Direction PBD-2025-05 commenced on 1 January 2026 and applies mandatorily to NSW Government agency procurements commencing on or after 1 July 2026. It requires agencies to use heightened due diligence tender clauses for procurements categorised as high modern slavery risk. DB Rail expects to be assessed by client agencies against the Guidance on Reasonable Steps and has prepared Annexure B for that purpose.
- Under section 176 of the Public Works and Procurement Act 1912 (NSW), NSW Government agencies must take reasonable steps to ensure that the goods and services they procure are not the product of modern slavery. DB Rail supports its clients in discharging that obligation.

8.4 Looking Ahead

DB Rail's planned focus areas for the next reporting period (FY 2026/2027) are:

- Issuing and embedding PO-09 Modern Slavery and Ethical Sourcing Policy as a standalone controlled policy within the Integrated Management System. The current policy was issued in August 2026, immediately following the end of the reporting period.
- Completing a documented self-assessment against the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps, including the supplier capability questionnaire, so that DB Rail can respond promptly to heightened due diligence tender clauses issued under PBD-2025-05.
- Applying the Inherent Risk Identification Tool across DB Rail's procurement categories and recording the resulting inherent risk ratings in FM-39 Risks and Opportunities Register.
- Extending modern slavery clauses to the purchase order terms and conditions at PR-18, so that the requirement reaches suppliers as well as subcontractors.
- Delivering a refresher toolbox talk (FM-04) on modern slavery indicators and reporting avenues to all workers and subcontractors.
- Continuing to monitor the Commonwealth reforms announced on 16 July 2026 and any resulting amendments to the Modern Slavery Act 2018 (Cth), and adjusting DB Rail's arrangements accordingly.

Mandatory criterion addressed: s.16(1)(g)

9. Approval

This Modern Slavery Statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth). It has been approved by the principal governing body of DB Rail Pty Ltd, being the sole Director, David Bradley, on the date set out below.

This statement is signed by David Bradley in his capacity as a responsible member of the reporting entity for the purposes of section 13(2)(c) of the Modern Slavery Act 2018 (Cth).

Role	Name	Signature	Date
Sole Director and member of the principal governing body	David Bradley		03/08/2026

10. Related Documents

The following IMS documents support this statement. The complete document set is maintained in FM-21 IMS Document Control Register on SharePoint.

Reference	Document name
PR-05	Just, Fair and Reasonable Conduct Procedure
PR-13	Competency Management Procedure
PR-38	Subcontractor Management Procedure
FM-05	Induction Checklist
FM-07	Continuous Improvement / Incident Form
FM-08	Continuous Improvement Register
FM-19	Contractor Evaluation Tool
FM-21	IMS Document Control Register
FM-32	Competency Matrix and Registers
FM-33	Legal Register
FM-36	Needs and Expectations Register
FM-39	Risks and Opportunities Register
FM-60	Subcontractor Pre-Qualification Assessment
PO-01	Health and Safety Policy
PO-02	Quality Policy
PO-03	Environmental Policy
PO-09	Modern Slavery and Ethical Sourcing Policy
PO-07	Environmental, Social and Governance (ESG) Policy
PR-01	Purchasing Procedure
PR-11	Supplier Management Procedure
PR-18	Purchase Order Terms and Conditions
PR-28	Stop Work Authority Procedure
FM-04	Toolbox Talk Record
FM-09	Management Review Record

Annexure A — Mandatory Criteria Mapping

The table below maps the seven mandatory criteria in section 16(1) of the Modern Slavery Act 2018 (Cth), together with the approval and signature requirements in section 13, to the sections of this statement where each is addressed.

Criterion	Requirement (s.16(1) Modern Slavery Act 2018 (Cth))	Where addressed
(a)	Identify the reporting entity	Section 2 — Identification of the Reporting Entity
(b)	Describe the structure, operations and supply chains of the reporting entity	Section 3 — Structure, Operations and Supply Chains
(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 4 — Modern Slavery Risks
(d)	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 processes	Section 5 — Actions Taken to Assess and Address Risks
(e)	Describe how the reporting entity assesses the effectiveness of such actions	Section 6 — Assessing the Effectiveness of Actions
(f)	Describe the process of consultation with any entities the reporting entity owns or controls	Section 7 — Consultation with Owned or Controlled Entities
(g)	Include any other information that the reporting entity considers relevant	Section 8 — Other Relevant Information
Approval	Approved by the principal governing body of the reporting entity (s.13(2)(b)) and signed by a responsible member (s.13(2)(c))	Section 9 — Approval

Annexure B — Alignment with the NSW Guidance on Reasonable Steps

DB Rail's principal clients are New South Wales Government agencies which are required to take reasonable steps to ensure that the goods and services they procure are not the product of modern slavery. The table below maps DB Rail's arrangements to the seven reasonable steps set out in the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps. DB Rail is not itself a covered entity under that Guidance; this mapping is provided to assist client due diligence, including under NSW Procurement Board Direction PBD-2025-05.

Reasonable step	What it requires	DB Rail arrangement
Commit	Engage stakeholders, identify salient modern slavery risks at organisational level, adopt a formal modern slavery policy and a risk management plan.	PO-09 Modern Slavery and Ethical Sourcing Policy; this statement (ST-01); modern slavery risk recorded in FM-39 and FM-36 and reviewed at management review (FM-09); Director accountable as the principal governing body (PD-01).
Plan	Map the supply chain and identify inherent modern slavery risk by product category; develop a risk-reducing sourcing strategy.	Supply chain mapped at Section 3.3; inherent risk assessed at Section 4 having regard to the Inherent Risk Identification Tool; sourcing controlled under PR-01 Purchasing and PR-11 Supplier Management.
Source	Integrate modern slavery risk into prequalification and supplier self-assessment; adopt shared-responsibility contract clauses.	FM-60 Subcontractor Pre-Qualification Assessment includes explicit modern slavery questions; PR-38 Subcontractor Management Procedure; modern slavery clauses included in subcontractor agreements where DB Rail is the contracting principal.
Manage	Monitor and evaluate supplier performance against indicators; build supplier capability.	FM-19 Contractor Evaluation Tool; supplier performance reviewed under PR-11; effectiveness indicators and results at Section 6; Avetta and Rail Industry Worker platform assessments.
Remedy	Provide or enable access to effective grievance mechanisms; remediate harm; use available leverage with suppliers.	PR-05 Just, Fair and Reasonable Conduct Procedure; FM-07 / FM-08 reporting and register; PR-28 Stop Work Authority Procedure; remediation commitments at Section 5.6.
Report	Establish a victim-centred reporting protocol; report on modern slavery management efforts.	Reporting and grievance avenues at Section 5.4, including anonymous reporting; annual voluntary statement published to the Modern Slavery Statements Register; reporting to client agencies on request.
Improve	Learn from performance, train the workforce, and cooperate with the NSW Anti-slavery Commissioner.	Induction (FM-05) includes a dedicated modern slavery module; toolbox talks (FM-04); internal audit and management review under the IMS; forward commitments at Section 8.4.