	Modern Slavery Statement HOLDCO HOLDINGS PTY LTD	HR POL 004 Version No: 01 Approved By: Brent Nally
Created Date: 26 April 2021	Last Revision Date: 26 April 2021	Printed Date: 18 June 2021

MODERN SLAVERY STATEMENT 2021

1. Introduction

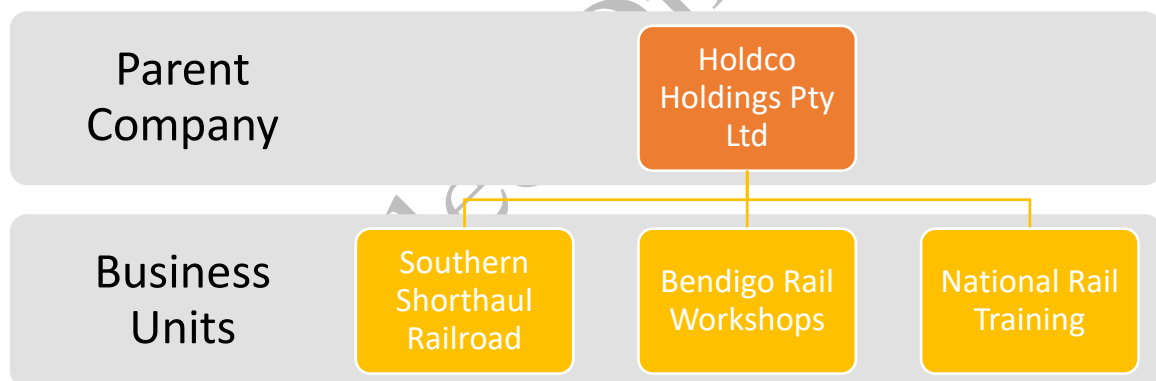
This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) for Holdco Holdings Pty Ltd (Holdco) including all wholly owned subsidiaries for the period 1 July 2020 to 30 June 2021 (reporting period).

The ‘Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities’ describes modern slavery as *situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom*. It refers to *serious exploitation and encompasses human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment, and the worst forms of child labour*.

The Holdco head office is situated at 175 Murphy Street, Bendigo, Victoria and is committed to operating in a lawful manner with high ethical standards.

2. Our structure, operations and supply chains

Holdco is an Australian owned and operated customer-focussed full service rail business operating throughout Australia. Striving to be more than just an expert rail freight services operator, Holdco has the ability and expertise to provide its customers with flexible and responsive equipment servicing and repair.



Southern Shorthaul Railroad (SSR)


SSR is an accredited rail operator with rail freight trains operating predominantly in New South Wales and Victoria. The core markets SSR operate in are:

- Grain and Coal Haulage
- Infrastructure Work Trains
- Intermodal Freight
- Testing and Commissioning; and
- Rollingstock Transfers

Bendigo Rail Workshops (BRW)

Based on two sites in Bendigo BRW provide full maintenance services to both freight and passenger rail customers. The core services offered by BRW include;

- Routine servicing, provisioning and wagon periodic maintenance.
- Repairing locomotive faults, changing out core components such as traction motors, power assemblies, engines, compressors, alternators, main generators, wheelsets and installing new ICE radio equipment.

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- Upgrade and project specific tasks for passenger rail assets including component change outs and full paint works
- Accident repairs
- Full strip down and overhaul
- Bogie overhauls
- Painting
- Field service and provisioning
- Emergency recovery

National Rail Training (NRT)

Is a Registered Training Organisation specialising in the delivery of rail specific training to SSR to ensure all staff within the organisation are trained and competent to complete their everyday tasks efficiently and safely.

At the end of the reporting period, the Holdco workforce consisted of more than 300 employees based throughout New South Wales and Victoria.


Our main supply chain comprise a mixture of government entities, multi-national or national companies and local supplier partners that provide products or services. All regular suppliers are based within Australia.

Core Areas of the Supply Chain	
Southern Shorthaul Railroad	Bendigo Rail Workshops
<ul style="list-style-type: none"> - Fuel - Track access - Rollingstock hire - Maintenance of rollingstock including spare parts - Accommodation - Motor vehicle management - Information technology - Consumables 	<ul style="list-style-type: none"> - Raw materials for manufacture - Components and spare parts - Consumables

3. Risks of modern slavery practices in our operations and supply chains

The ‘Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities’ describes the risks of modern slavery practices as the potential for an entity to *cause, contribute to, or be directly linked to modern slavery through its operations and supply chains*. There is minimal risk of causing modern slavery as Holdco have policies, procedures and practices in place to ensure that our business remains legally compliant and ethical. Employee entitlements and workplace conditions, and that our employees treat each other with fairness, respect and dignity are governed by Enterprise Agreements, Awards governed by Fair Work Australia or internal policies.

Holdco acknowledges there is potential risk of modern slavery practices in its supply chain but assess this as very low due to the high compliance, component quality tracing and regulatory nature of the industry. This ensures suppliers are assessed by senior management prior to any engagement. The risk is further reduced by having no direct international suppliers.

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4. Actions taken to assess and address modern slavery risks

This is the first reporting period for Holdco and as such focused on gaining a better understanding of modern slavery risks and how these risks may be present in our operations and supply chains. As part of the due diligence process, we have considered risk factors such as the industry we operate in, the types of products and services we require to meet our customer requirements. A review of major suppliers has determined any instances of modern slavery practices during the reporting period is very low risk. Holdco has extensive policies, procedures and practices in place, including continuous improvement and review processes, to ensure that our business remains legally compliant and ethical.

We are proud of our culture and values, and our executive management team are highly engaged on a daily basis which ensures the business meets the needs and compliance of all stakeholders. We will continue to have our procedural controls and reviews in place to keep this risk low. We also consider the risk of modern slavery practices occurring in our major suppliers who are generally large companies as low, or if such risks have been identified they are being addressed, because these companies already have their own modern slavery compliance measures in place.

In the next reporting period Holdco will start to focus on supplier surveys to capture current data for review to aid in identifying modern slavery risks as well as creating awareness.

5. Assessing the effectiveness of actions taken

During this first reporting period, Holdco's focus was to gain a better understanding of modern slavery risks and how such risks may be present in our operations and supply chains. A preliminary assessment of these risks in our operations and of our major supplier partners was performed. At this early stage, we are unable to adequately assess the effectiveness of the measures undertaken. However, Holdco has commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

6. Commitments for the next reporting period

For the next reporting period, our focus will be to:

- Create awareness within senior management in modern slavery requirements.
- Review new supplier processes to include a risk assessment regarding modern slavery.
- Engage our major supplier partners and obtain data to aid in identifying modern slavery risks in their operations and supply chains.
- Continue to work on developing frameworks and processes to assess the effectiveness of the actions taken to identify and address modern slavery risks.

This statement was approved by the Board of Directors.



Brent Nally
 Director – Corporate Services