

PG029 Modern Slavery Statement

April 2025

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Document History and Version Control

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Table of Contents

Document History and Version Control.....	2
Table of Contents	3
1 Introduction & Approval	4
2 About The Pulitano Group	4
2.1 Our Structure.....	4
2.2 Our Operations.....	4
2.3 Our Supply Chains	5
3 Risk Assessment & Identification	5
3.1 Risks in Our Industry	5
3.2 Our Risk Assessment Methodology	5
4 Addressing the Risks of Modern Slavery	6
4.1 Supplier Due Diligence & Oversight.....	6
4.2 Supplier Engagement & Collaboration.....	6
4.3 Internal Controls & Policies	6
5 Assessing the Effectiveness of Our Actions	6
6 Consultation & Future Commitments	7
7 Approval and Submission	7

1 INTRODUCTION & APPROVAL

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and outlines the steps taken by Pulitano Group ("the Group") to assess and address risks related to modern slavery in its operations and supply chains.

The Group is committed to ethical business conduct, the protection of human rights, and eliminating modern slavery risks from our operations and supply chains. We acknowledge that modern slavery includes forced labour, human trafficking, child labour, and debt bondage, and we strive to ensure that our business activities do not contribute to these issues.

This statement has been approved by the Board of Directors of The Group on 7 April 2025.



[Authorised Signatory]
Chairman Board of Directors
Pulitano Group

2 ABOUT THE PULITANO GROUP

2.1 Our Structure

The Pulitano Group is a family-owned business that operates multiple public transport and related services. Our registered address and primary place of business is:

Pitcher Partners, Level 13, 664 Collins Street, Docklands VIC 3008.

Our network includes the following related entities:

- Westside Bus Co Pty Ltd
- Toowoomba Transit Pty Ltd
- Bus Queensland (Lockyer Valley) Pty Ltd
- Cranbourne Transit Pty Ltd
- Bus Queensland Pty Ltd
- Pulitano Investments Pty Ltd
- Toowoomba Admin Pty Ltd
- Park Ridge Admin Pty Ltd
- Cranbourne Transit Admin Pty
- Mansfield-Mt Buller Bus Lines Pty

2.2 Our Operations

The Group specialises in the provision of safe, reliable, and efficient transport solutions. Our key operational activities include:

- Providing scheduled public transport services under government contracts.
- Operating private charters and school bus services.
- Managing a fleet of buses and associated maintenance facilities.

- Employing drivers, mechanics, and administrative staff across various locations in Queensland.
- Engaging overseas candidates for labour, ensuring compliance with sponsorship and labour agreements.

Bus Queensland operates exclusively in Australia.

2.3 Our Supply Chains

Our supply chains include suppliers of:

- Bus manufacturers and vehicle parts suppliers.
- Fuel and energy providers.
- Cleaning and maintenance service providers.
- IT, telecommunications, and office equipment suppliers.
- Uniform and safety equipment manufacturers.

Key suppliers include:

- Volvo, Volgren, Scania, Multispares, and Ampol.
- These suppliers operate both in Australia and internationally, providing vehicles, parts, and consumables.

We expect our suppliers to be compliant with the Modern Slavery Act due to their size and global presence, though we recognise the need for further due diligence.

3 RISK ASSESSMENT & IDENTIFICATION

3.1 Risks in Our Industry

The transport industry has exposure to modern slavery risks, particularly in:

- The manufacturing of buses and vehicle parts in high-risk regions.
- The procurement of fuel, uniforms, and electronic equipment from suppliers with complex global supply chains.
- The employment of subcontracted cleaning and maintenance workers, where conditions may be less regulated.
- The engagement of overseas workers in potential breach of sponsorship or labour agreement obligations.

3.2 Our Risk Assessment Methodology

To assess these risks, we:

- Conducted a geographical risk assessment based on the Global Slavery Index.
- Mapped our key suppliers and their labour practices.
- Reviewed contractual obligations and supplier due diligence processes.
- Identified sector-specific risks, such as reliance on low-paid or migrant workers.

4 ADDRESSING THE RISKS OF MODERN SLAVERY

4.1 *Supplier Due Diligence & Oversight*

The Group has implemented a supplier assessment framework, which includes:

- **Supplier Code of Conduct:** Outlining ethical standards and modern slavery compliance expectations.
- **Pre-contractual due diligence:** Assessing supplier labour policies and governance.
- **Ongoing audits and site visits:** Conducting regular ethical audits for high-risk suppliers.
- **Contractual obligations:** A modern slavery clause is proposed to be included in purchasing agreements for buses and parts.

4.2 *Supplier Engagement & Collaboration*

We work closely with our suppliers to mitigate modern slavery risks by:

- Establishing long-term partnerships with reputable manufacturers and service providers.
- Encouraging open dialogue about ethical labour practices.
- Supporting continuous improvement in supplier working conditions.

4.3 *Internal Controls & Policies*

The Group has adopted the following internal measures:

- **PG025 Whistleblower Policy:** Providing employees and suppliers with secure channels to report concerns.
- **PG024 Human Rights Policy:** Ensuring compliance with international human rights laws.
- **PG030 Procurement Guidelines:** Integrating modern slavery risk assessments into supplier selection.
- **Employee Training:** No formal training programs have been conducted, but future initiatives are planned.

5 ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

To evaluate our efforts in addressing modern slavery risks, we:

- Conduct regular reviews of supplier compliance and risk assessments.
- Monitor and respond to whistleblower reports and grievance mechanisms.
- Benchmark against industry best practices and international human rights standards.
- Engage with external auditors and industry groups to improve oversight and transparency.
- Track metrics such as non-compliance incidents reported and resolved.

6 CONSULTATION & FUTURE COMMITMENTS

We have engaged with key stakeholders across our operations and supply chains to strengthen our approach to modern slavery risk management. Our future commitments include:

- Expanding supplier audits and risk assessments.
- Enhancing employee and supplier training programs.
- Strengthening our supplier Code of Conduct and contract requirements.
- Collaborating with industry partners to promote ethical procurement practices.

At present, consultation with subsidiaries or related entities is limited, but will be developed as part of our continuous improvement efforts.

7 APPROVAL AND SUBMISSION

Name and Position of Approving Authority: Board of Directors

Date of Approval: 7 April 2025

Publication Method: This statement will be published on the Bus Queensland's, Cranbourne Transit's and Mansfield's website and the Australian Border Force Modern Slavery Register.