



MODERN SLAVERY STATEMENT 2025

(For Financial Year 1 July 2024 to 30 June 2025)

ARTC

Australian
Rail Track
Corporation

ABN 75 081 455 754
11 Sir Donald Bradman Drive
Keswick Terminal, SA 5035



ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Custodians of the Countries on which we work and live and appreciate the deep connection that is held to Land, Sea, Sky and Community by First Nations People.

We extend this respect to all Elders past and present who have preserved and cared for the Land and Waters for thousands of years.



Image: *Journey* artwork by Elenore Binge, Gomerioi/Kamilaroi woman

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ABOUT THIS STATEMENT

The Australian Rail Track Corporation Limited (ARTC) has prepared this Modern Slavery Statement to address the requirements of the *Australian Modern Slavery Act 2018* (Cth) (Act). The reporting period covered by this statement is 1 July 2024 to 30 June 2025 (FY25).

This is ARTC's sixth Modern Slavery Statement and showcases our ongoing commitment to ensure that slavery in any form does not occur within our supply chain.

We believe that all people around the world have the right to live free from exploitation. This statement summarises our approach to preventing slavery within our supply chain and outlines the actions we took in FY25 to further assess and address modern slavery risks.



OUR STRUCTURE, OPERATIONS, SUPPLY CHAINS AND PEOPLE

OUR BUSINESS

At ARTC, our purpose is to deliver a safe and effective rail network operation that connects the nation, now and into the future.

We are a vital link in Australia's transport supply chain – maintaining and operating the national rail network to help move freight and passengers safely, reliably and efficiently.

In fact, our people manage the transit of 415 freight and passenger trains every day to connect our regions, cities and ports. This makes us one of the largest rail network managers in Australia, with our 9,600km network spanning five states and the lands of more than 50 First Nations.



OUR STRUCTURE

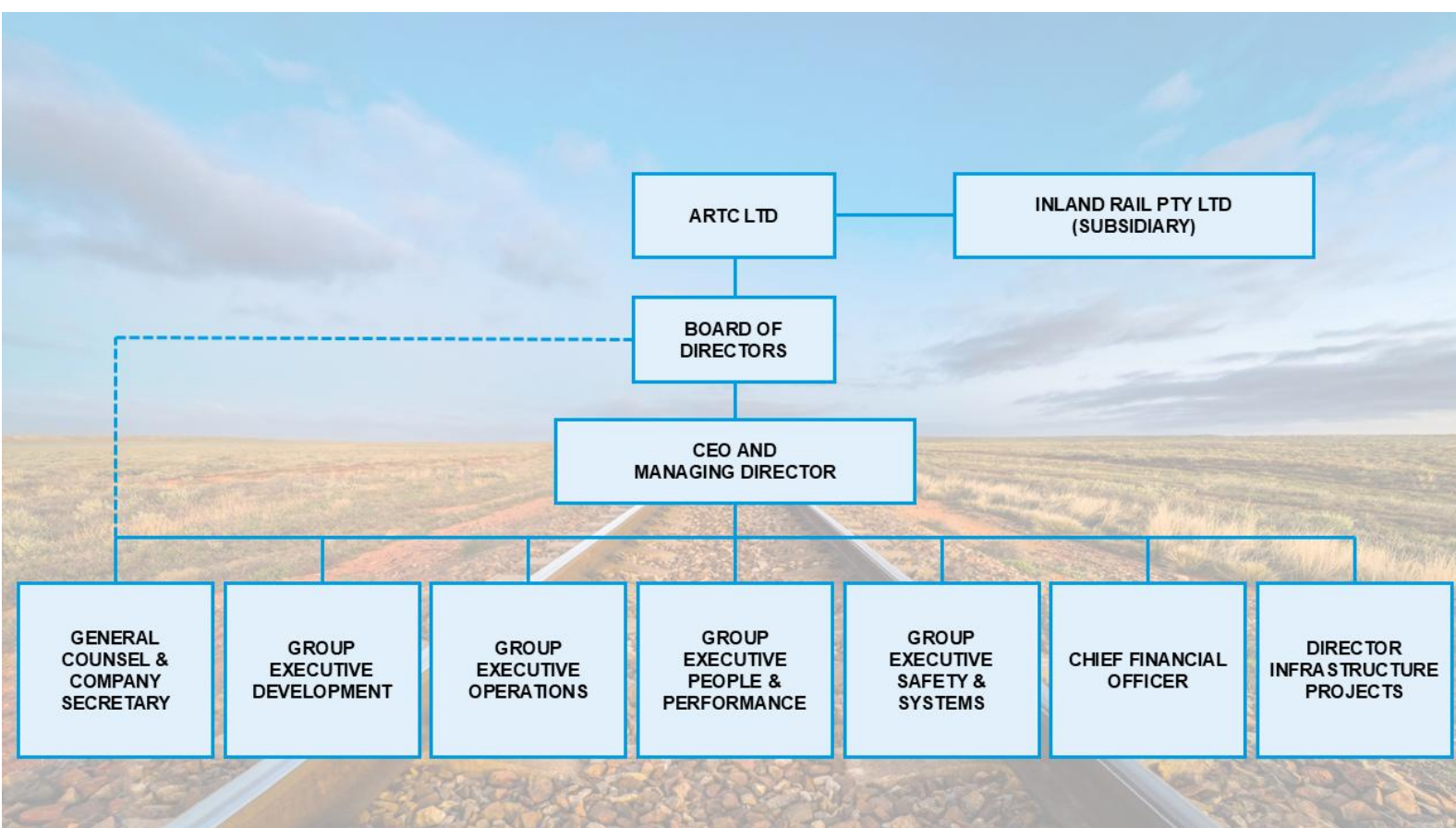
ARTC is an unlisted public company limited by shares incorporated under the *Corporations Act 2001* and a Commonwealth company for the purposes of the *Public Governance, Performance and Accountability Act 2013*.

Our shares are owned by the Commonwealth of Australia, represented by the Minister for Infrastructure, Transport, Regional Development and Local Government, and the Minister for Finance.

We are governed by a Board of Directors, appointed by the Shareholder Ministers.

ARTC has three committees reporting to the Board of Directors, with each Committee governed by its own Charter detailing the Committee's role, membership requirements and duties. Over the course of the year, the Committee's structure was reviewed, leading to the implementation of a revised framework.

Inland Rail Pty Ltd (IRPL) is a wholly owned subsidiary of ARTC to deliver the Inland Rail program. It has its own six-member Board, Chief Executive Officer and constitution. IRPL has been in consultation with ARTC, and they will produce their own Modern Slavery Statement.



GOVERNANCE

ARTC's system of corporate governance reflects the ASX Corporate Governance Principles and Recommendations covering management, Board structure, ethics, reporting, disclosures, risk management and remuneration.

As a Government Business Enterprise (GBE), we are proud to be held to rigorous standards of governance and disclosure. Under Section 98 of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act), the Auditor General is responsible for auditing the company's financial statements.

ARTC's Annual Report is tabled in Parliament and financial accounts are lodged with the Australian Securities and Investments Commission (ASIC).

ARTC continues to implement and maintain high standards of probity and financial controls in connection with procurement as guided by our Shareholder's Statement of Expectations.

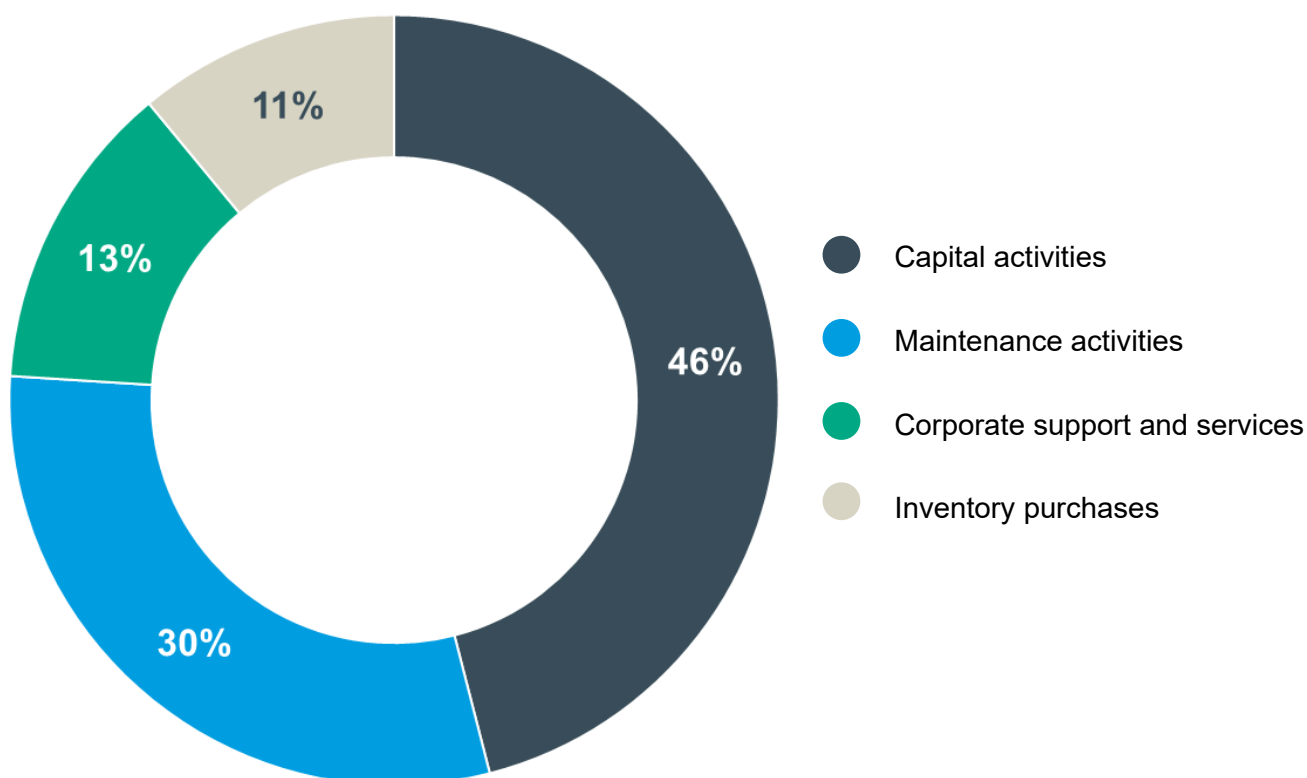


OUR OPERATIONS

Our major areas of supplier spend are rail infrastructure costs including ballast, rail, sleepers, turnouts, electrical components, labour, and civil construction works.

ARTC's supply chain can be broadly classified across four categories:

1. **Capital activities:** Major construction and sustaining capital works.
2. **Maintenance activities:** Engineering, maintenance services and major maintenance rail infrastructure works
3. **Corporate support and services:** Purchases for operations including utilities, training, uniforms, IT services and recruitment
4. **Inventory purchases:** Purchase of type-approved products held as stock items until issued.



SUPPLY CHAIN

ARTC's supply chain comprises the provision of goods and services that enable us to maintain and improve the national rail infrastructure that we are responsible for.

Our procurement activities take place in Australia, and our suppliers are predominantly Australia-based, with some goods and services sourced from the US, Asia and Europe.

We have assessed our supply chain which determined that 99% of the suppliers we contract with directly are located in Australia, and over 90% of our goods and services are sourced or manufactured in Australia.

COUNTRY	*2024 RISK SCORE (0 - 10)	*2025 RISK SCORE (0 - 10)	% OF TOTAL SPEND
Australia	2.0	2.0	99%
United States	3.4	3.5	<1%
New Zealand	1.9	2.2	<1%
United Kingdom	2.6	2.3	<1%
Singapore	3.0	2.7	<1%

**Geographic risk assessed using modern slavery assessment tool developed for ARTC by an independent external advisor.
Risk Score explanation 0 = low, 10 = high*

OUR PEOPLE

At ARTC, 94.15% of our employees work on full-time permanent arrangements. 1.95% are on specific term arrangements, while 3.9% are on part-time arrangements. We operate entirely in Australia with offices located across Australia to operate our 9,600km rail network.

ARTC has introduced various policies and instruments to address the risks of modern slavery in our operations. We have targeted measures for:

AREA	COMMENT
Diversity, Equity & Inclusion	<ul style="list-style-type: none"> Female senior leaders have increased from 47% to 50% during FY25 ARTC became a member of the Champions of Change Coalition Rail Group and held listen and learn sessions led by the CEO to gain insight into our current perceptions and practices on gender equality Following these listening sessions, ARTC has created and commenced work on a 12-month foundational Gender Equity Plan (Tracks for Change) to ensure we meet the standards of our people and our community with realistic and relevant measures A long-term and action-orientated Gender Equity Plan will be developed from the foundational piece to continue our journey of improvement towards safety and opportunity for all genders equally at ARTC.
First Nations participation	Our First Nations participation is above target at 5% and reflective of actions taken.
Wellbeing & engagement	<p>ARTC has a comprehensive Employee Assistance Program (EAP) which provides a range of support services to suit individual needs, including:</p> <ul style="list-style-type: none"> <i>Employee Assist / Family Assist:</i> General issues including high stress, relationships, parenting, returning to work after an absence, caring for an elderly parent, grief/loss etc. <i>First Nations Helpline:</i> A dedicated First Nations support line with culturally available support on topics such as work, personal issues, relationships, financial or cultural <i>Career Assist:</i> Promotion, job loss, retirement, maternity leave etc. <i>Money Assist:</i> Practical strategies to deal with financial stress <i>Lifestyle & Nutrition Assist:</i> Gambling, fatigue, weight, and health issues <i>Conflict Assist:</i> Coping strategies if you are dealing with external stress such as conflict with a colleague or manager/employee etc. <i>Legal Assist:</i> access to two sessions, providing legal counselling service to assist with legal issues, understanding avenues and options <i>Manager Assist:</i> Professional, impartial advice if you are responsible for a team of people and have a workplace issue to work through.

Enterprise Agreements

Approximately 93.5% of ARTC's employees are covered by Enterprise Agreements with terms and conditions that are negotiated with employees and their representatives. Our Enterprise Agreements provide fair and equitable remuneration, including penalty and allowance payments for eligible employees and annual remuneration increases. The Agreements also include a dispute settlement procedure, and a procedure on consultation for major workplace changes.

Common Law Contracts

6.5% of our employees are engaged in common law contracts, the conditions of which are underpinned by the National Employment Standards.

Policies & Procedures

In addition to our Enterprise Agreements, ARTC has a suite of comprehensive policies and procedures providing conditions and employment processes that go beyond legislative entitlements to help us support the human rights of our employees. These include a Leave Policy with various generous provisions including cultural and domestic/family violence provisions, a Talent and Acquisition Procedure to support diverse candidates, and a remuneration framework which benchmarks against market data. Other policies and procedures include our Code of Conduct, Grievance Procedure, Sexual Harassment and Sex-Based Discrimination Procedure, Just and Fair Culture Procedure, Race Relations and Anti-Discrimination procedure and Whistleblower and Public Interest Disclosure Procedure.



RISK MANAGEMENT OF MODERN SLAVERY

The nature of our business means that risk management – especially regarding the safety and wellbeing of our employees and contractors – is extremely important.

We are committed to continually improving and upholding our policies and procedures to make sure we only source from suppliers who meet our pre-qualification requirements. This ensures we only do business with ethical suppliers who look after their employees and subcontractors.

Key related policies and procedures include:

- ARTC's **Sustainable Procurement Policy** includes a commitment to “manage and mitigate modern slavery issues in the procurement of products and/or services.”
- Our **Code of Conduct** recognises the importance of integrity and ethical behaviour. It sets out the principles of conduct and behaviour required by our employees.
- Our framework for the disclosure of suspected wrongdoing and the protection of whistleblowers is in accordance with the *Public Interest Disclosure Act*, which applies to disclosures made by ARTC employees.
- All procurement activity must be conducted without prejudice or favour and in accordance with our **Code of Conduct** and **Conflicts of Interest and Gifts Policy**. All participants in any procurement activity must declare any potential, actual or perceived conflicts of interest.
- Our **Procurement Framework**, which sets out the compulsory principles for the procurement of goods and services for all activities. These principles are:
 - Value for money
 - Open, fair and equitable competition
 - Effective, efficient, economical and ethical processes
 - Ethical behaviour and probity
 - Confidentiality
 - Procurement risk management.
- ARTC's Pre-Qualification requires our suppliers to demonstrate conformance to contract particulars and to key legislative requirements such as Labour Hire Licensing and the Modern Slavery Act.

ARTC also uses a supplier risk assessment tool across the entire supply chain to identify areas of exposure to higher risk of modern slavery based on the following criteria:

- **Inherent risk** – relating to the geographic locations and industries our suppliers operate in
- **Adjusted risk** – relating to factors such as our suppliers' modern slavery initiatives, relevant policies, and their own modern slavery reporting obligations
- **Weighted risk** – relating to our relative exposure to modern slavery risk weighted by spend for each supplier.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the FY25 reporting period, we made significant progress with the actions we outlined in our 2024 Modern Slavery Statement to address the modern slavery risks associated with our operations and supply chains. Key outcomes include:

SUPPLIER RISK ASSESSMENTS

Sustain a greater than 95% completion rate for risk assessments of our suppliers, with primary objective to ensure that all suppliers, regardless of spend, have awareness of modern slavery

We have been able to reach our target by mandating modern slavery questions as part of ARTC's vendor onboarding process. The assessments have been conducted with 2,500+ vendors.

ARTC also developed a more in-depth Self-Assessment Questionnaire (SAQ) for our vendors to complete to ensure transparency and consistent outcome. The additional information includes:

- Specific policies available such as Human Rights / Modern Slavery Policy, Supplier Code of Conduct / Ethics Policy, Whistleblower System / Policy, Sexual Harassment Policy, Anti-Discrimination Policy, Workplace / Occupational Health & Safety Policy
- Supply chain due diligence against suppliers and subcontractors
- Specific exploitation questions relating to child labour, forced labour, bonded labour and human trafficking
- Employment conditions such as contracts, accommodation and entitlements
- Available grievance and redress mechanisms.

This will support further identification of modern slavery risks or, conversely, the reduction of presumed risks and identification for further due diligence.

In FY25, ARTC received 20% of vendor responses for the new SAQ, with the focus on our high-risk construction and high spend contractors. We analysed the results and found a reduction in the contractors' scores from their original, with only 2% needing further review.

Our ongoing aim is to work on receiving responses from all vendors on the new SAQ via the Avetta portal or emails and will conduct reviews either by request for information or interviews.

DUE DILIGENCE REVIEW

Complete the three-year independent desktop due diligence review of ARTC suppliers, with recommendations and interviews completed as required

ARTC continues to engage an independent external advisor to complete due diligence reviews. The methodology aligns with relevant global standards and global counter-slavery legislation.

ARTC requested additional improvements and upgrades to the supplier modern slavery risk assessment tool to expand capability, including:

- **Subnational capability:** The tool looks at the national (country)-level geographic risk of a supplier. We can now analyse down to the sub-national level, ascribing different risks based upon the state or province that the supplier is located within.
- **Human Rights risk capability:** The tool is designed to detect modern slavery risk in supply chains. Adding national-level geographic risk indices by category type will give us the option to evaluate other risks within the supply chain such as Politics & Governance Risk, Labour Practices, Gender and Vulnerability & Development.

There were no direct or immediate red flags identified for corrective or escalatory action.

MODERN SLAVERY TRAINING

Achieve 90% successful completion of Modern Slavery eLearning training by ARTC employees engaged in procurement activities

Modern slavery awareness training is implemented and completed by all ARTC employees through the ARTC Essentials eLearning module.

Our People team launched a refresher ARTC Essentials training during the reporting period and we were able to achieve 98% completion for all ARTC employees, and 99% completion by our employees who purchase goods and services on behalf of the company.

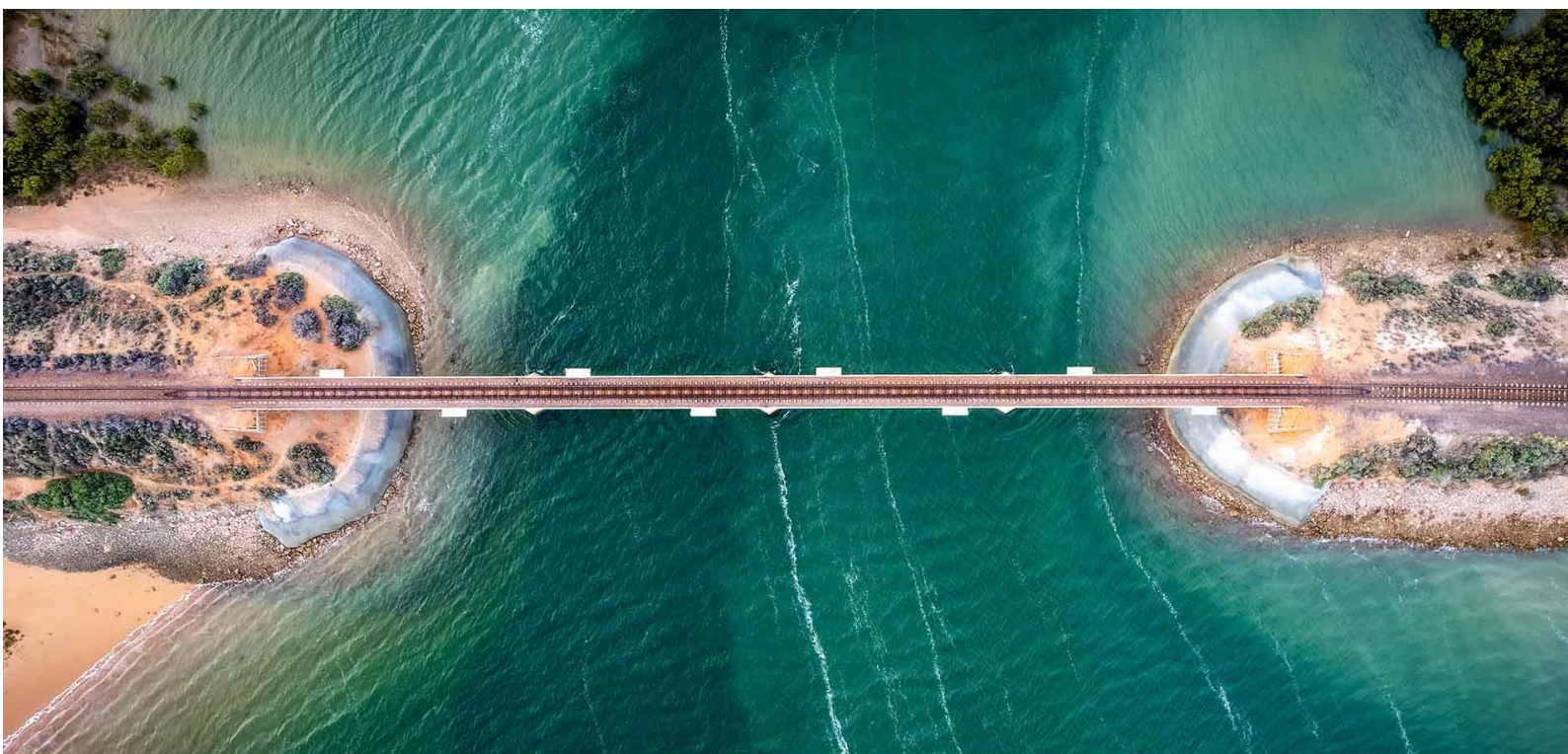
ASSESSING EFFECTIVENESS

ARTC continues to assess and monitor the effectiveness of processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to.

We continually assess the effectiveness of our actions in identifying and managing modern slavery risks by:

- Partnering with suppliers and other external partners
- Periodic auditing of suppliers who provide services considered to be high-risk in relation to modern slavery
- External desktop due diligence reviews every three years to track progress
- Non-compliance reporting to senior management with remediation steps applied, including termination of supply with immediate effect as appropriate
- Partially managing annual modern slavery updates through ARTC's third party contractor compliance system (Avetta)
- Monitoring compliance with the *Labour Hire Licensing Act* (LHLA) for required states
- Ongoing review of training and awareness for our employees
- Ongoing engagement and consultation with stakeholders to prevent slavery within our supply chain
- Ongoing review of policies and procedures to increase awareness, prevention, detection and response to modern slavery issues across the organisation
- Ongoing industry engagement, for example becoming an inaugural member of the ARA's Modern Slavery Network Committee
- Monitor reporting mechanism and promote further communications
- Continuing to submit our annual Modern Slavery Statement to the government's online register as well as publishing on ARTC's website.

Over the next reporting periods, ARTC will develop a plan listing the above practices and actions as key performance indicators (KPIs). Based on the results of these processes we will adapt and strengthen our actions to continually improve our response.



FUTURE COMMITMENT

We remain dedicated to sustaining and further strengthening practices to continuously reduce any exposure to slavery and human trafficking risks.

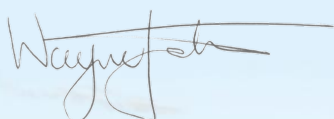
Our future commitments include:

- Using the enhanced risk assessment tool, further investigate scores received from the new SAQ where scores have significantly changed
- Greater than 80% completion rate of the new SAQ received across the supply chain to ensure transparency and consistent outcomes
- Continue to provide training to increase awareness, prevention, detection and response to modern slavery across the organisation
- Develop and monitor key actions and KPIs related to Assessing Effectiveness.

APPROVAL

This statement is made pursuant to the *Australian Modern Slavery Act 2018* (Cth) and has been approved by the ARTC Board on 9 October 2025.

Signed



Wayne Johnson

Chief Executive Officer and Managing Director

ARTC



APPENDIX

How ARTC has addressed the Modern Slavery Act's requirements:

Mandatory criteria	Page Number and Section heading
Identify the reporting entity	Page 1 – About this Statement
Describe the reporting entity's structure, operations, and supply chains	Page 2-8 – Our Structure, Operations, Supply Chains and People
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 9 – Risk Management of Modern Slavery
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Page 10-11 – Actions Taken to Assess and Address Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of these actions	Page 12 – Assessing Effectiveness
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 3 – Our Structure
Provide any other relevant information	Page 13 – Future Commitment and throughout this statement