MODERN SLAVERY STATEMENT

Financial Year 2024-25



KEOLIS





To meet our seven mandatory reporting criteria, our statement is structured across seven sections.

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ACKNOWLEDGEMENT OF COUNTRY

Keolis ANZ acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work.

We would like to acknowledge and pay our respects to the Elders of the past, present and future in maintaining the culture, country and their spiritual connection to the land



Do you have a modern slavery concern?

Our Voice is an external, independent service which allows people to report behaviour that is inappropriate, unethical, corrupt or illegal, including concerns about modern slavery. All reports made to Our Voice may be made anonymously.

Online: https://keolisanz.dws.deloitte.com.au
Phone: 1800 940 889 (free call from within Australia)
Letter: Keolis ANZ Our Voice, Reply Paid 12628, A'Beckett Street, Melbourne VIC 8006





Chief Executive Officer Introduction

As the CEO of Keolis ANZ (previously Keolis Downer), I am pleased to present our Modern Slavery Statement for FY25 financial year.

Modern slavery is a profound violation of human rights, encompassing practices such as forced or bonded labour, human trafficking, child labour or deceptive recruiting for labour or services.

At Keolis ANZ we are committed to ensuring that our operations and supply chains are free from any form of human rights abuse, including modern slavery. We are dedicated to conduct business in an ethical and responsible way. We implement a risk-based approach to managing modern slavery and are committed to continuously improving our processes.

In FY25, we continued to strengthen our processes and procedures to combat modern slavery risks within our operations and supply chain. While we have made progress and improvements, we remain alert to the challenges and risks we face and understand we must keep sight of current and evolving threats. We will continue to collaborate with our internal and external stakeholders over the coming years to address our own modern slavery risks and build on our commitment to combat modern slavery in our supply chain.

This Modern Slavery Statement was approved by the Board of Keolis ANZ.



David Franks
Keolis ANZ Chief Executive Officer

Criteria A
About our statement

This Modern Slavery Statement applies to and describes the steps taken by Keolis ANZ Pty Ltd ACN 165 343 680 (Keolis ANZ) and all group subsidiary entities, as informed by the Commonwealth Modern Slavery Act 2018, for the period 1 July 2024 to 30 June 2025 (FY25) to mitigate modern slavery in its operations and supply chains.

KEOLIS ANZ PTY LTD

Registered office:

Suite 2.03 Level 2
55 Clarence St
Sydney NSW 2000 Australia

This statement is submitted as a joint statement on behalf of all reporting entities which include the following Keolis ANZ Group wholly owned operating subsidiary entities:

- KDR Victoria Pty Ltd ACN 136 066 074
- Keolis ANZ Bus and Coachlines Pty Ltd ACN 604 655 140
- Keolis ANZ Adelaide Pty Ltd ACN 644 359 473

Other group entities covered by this Statement are listed in the Appendix[1].

The Statement has been signed by the Chief Executive Officer of Keolis ANZ.

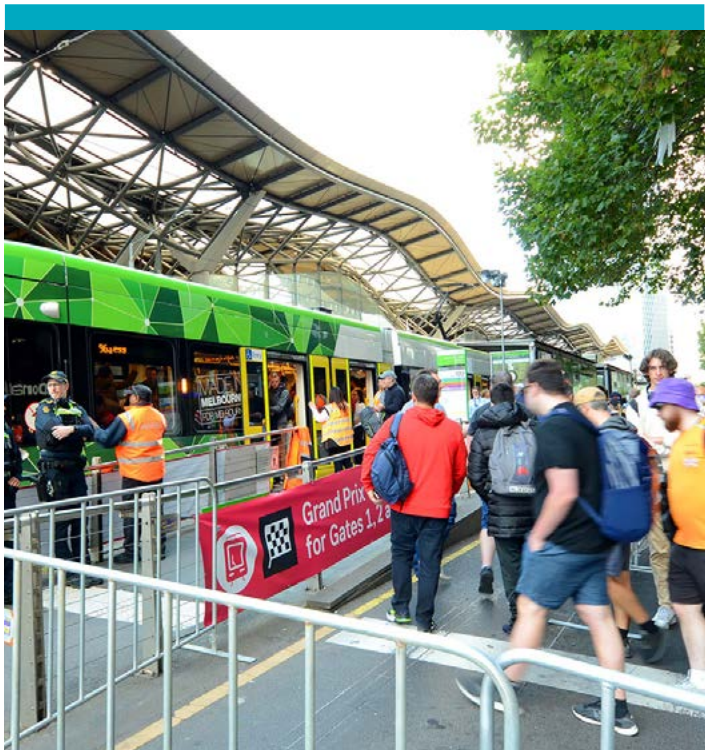
Our approach

This Modern Slavery Statement is published in accordance with the Modern Slavery Act 2018 (Cth). Keolis ANZ supports the aim of the Act, which is to combat modern slavery in global supply chains and to illuminate the impact of modern slavery across the world. The Keolis ANZ approach to modern slavery risk reflects our core values which is to treat people with fairness, respect and dignity.

Keolis ANZ respects universal human rights and will work to identify and manage the risks of modern slavery in its own operations and in its supply chain. We provide a healthy, safe and sustainable workplace underpinned by the Keolis ANZ Zero Harm Policy and we reject any activities which may cause or contribute to forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage or deceptive recruiting for labour or services.

Keolis ANZ stands against modern slavery in all its forms and expects that all our employees, suppliers, contractors, stakeholders and other business partners share this view.

We acknowledge the diverse nature of our supply chain and the challenges we face to make our supply chain visible. To mitigate these challenges, we will provide leadership through education, collaborate widely and establish a pathway of accountability for our organisation.



Criteria B
Our structure, operations and supply chain

Our Operations

Keolis ANZ is a leading operator and integrator of public transport in Australia. With over 2500 employees and a presence in five states, Keolis ANZ enables tens of millions of passenger journeys per year.

We operated and maintain the largest tram network in the world in Melbourne (Yarra Trams) until December 2024, the light rail network on the Gold Coast (G:link), the Adelaide Metro train services and more than 1,500 buses in New South Wales, Western Australia, South Australia and Queensland.

Established in 2009 as Keolis Downer, Keolis ANZ continue to be a provider of integrated services across Australia.





Keolis ANZ Snapshot

MELBOURNE LIGHT RAIL – YARRA TRAMS (UNTIL DECEMBER 2024)

Yarra Trams is the world's largest tram network proudly operated by Keolis ANZ and delivers more than 200 million passenger trips each year.

- 500+ trams
- 2,500+ employees
- 5,000 services a day





GOLD COAST LIGHT RAIL – G:LINK

- 18 trams
- 200+ employees
- 845,000+ passengers every month

ADELAIDE METRO RAIL SERVICES (UNTIL FEBRUARY 2025)

- 70 diesel and 30 electric trains
- 6 lines
- 89 stations
- 500+ employees
- 15 million passenger trips per year





NEWCASTLE MULTI MODAL CONTRACT

First multi-modal public transport contract to be delegated to a private operator in Australia.

It includes buses, ferries and light rail.

- Over 180+ buses
- 2 Ferries
- 6 light rail vehicles
- 4 On Demand Vehicles
- 400+ employees



BUS OPERATIONS ACROSS AUSTRALIA

NEW SOUTH WALES - Northern Beaches & Lower North Shore: 800+ employees, 400+ vehicles, 31 million+ passenger trips per year, 12 On Demand Vehicles.

WESTERN AUSTRALIA - Pathtransit: 700+ employees, 15 million vehicle km/per year, 400+ vehicles, 8 million passenger journeys per year.

SOUTH AUSTRALIA - Southlink & LinkSA: 260+ vehicles, 3,600+ weekly services, over 3.5 million passenger journeys per year and 6 On Demand Vehicles.

QUEENSLAND - Hornibrook Buslines: 115+employees, 64+ vehicles, Over 1.7million passenger journeys per year, 3.6 million+ vehicle km/per year.



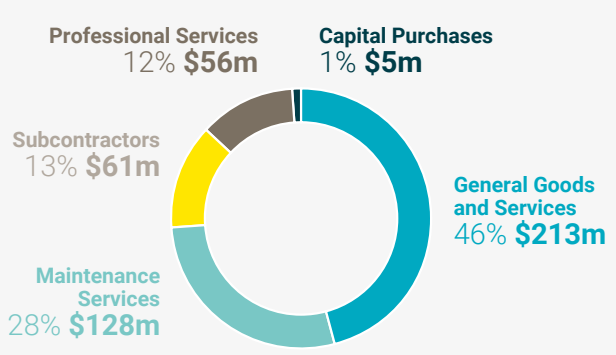
Our Supply Chain

Keolis ANZ engages with a diverse network of suppliers. Our partners range from large established businesses to smaller local business. Keolis ANZ's supply chain can be broadly classified across 5 categories:

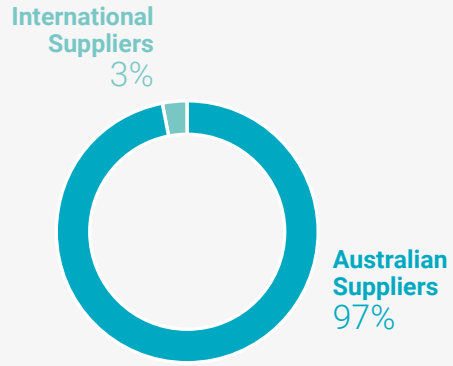
- **General Goods and Services:** Purchases for operations including fuel, spare parts, uniforms, IT services and other items
- **Maintenance Services:** Maintenance works and services on vehicles and property.
- **Subcontractors:** Contractors hired by Keolis ANZ to perform services such as consulting and other operational activities.
- **Professional Services:** Supporting functions for business which can include legal, financial and accounting advisory in addition to other technical services.
- **Capital Purchases:** Purchase of assets such as fleet vehicles, land and buildings.

The major suppliers used by Keolis ANZ are essentially Australian for 93%, which reflects our priority in supporting local Australian businesses.

Percentage of spend for major suppliers by supplier category



Major Supplier profile by geographic location by spend



	Country	Spend	Modern Slavery Risk Rating			
			Prevalence	Vulnerability	Government Response	Overall Rating
1	Australia	$314m	1.6	7	67	Low
2	Czech Republic	$4.2m	4.2	13	59	Low
3	Austria	$1.3m	1.9	8	62	Low
4	China	$1.3m	4	46	40	Medium
5	Germany	$0.6m	0.6	11	62	Low

Total Spend for major suppliers in FY25 was $337m.

Based on Global Slavery Index

1 to 4.5	1 to 39	60-100	Low
4.6-10.5	40-79	30-59	Medium
More than 10	80-100	1 to 29	High

Criteria C
Identification of modern slavery risks in our operations and supply chain

Keolis ANZ recognises modern slavery as acts of servitude, slavery, forced labour, forced marriage, child labour, debt bondage, deceptive recruiting for labour or services and trafficking.

It refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

Keolis ANZ's group and entity policies govern how we identify and respond to modern slavery risk.

Consistent with the **UN Guiding Principles on Business and Human Rights**, we continue to assess our potential to:

- Cause modern slavery through our operations
- Contribute to modern slavery through our operations
- Be directly linked to modern slavery through the operations, products, services or activities of a supplier, whether they reside in our Tier 1 supply chain or beyond.

For the purposes of this report, Keolis ANZ defines our operations and supply chain in the following way:

Operations: Activity undertaken by Keolis ANZ to pursue its business objectives and strategy, including the direct employment of workers engaged in the lifecycle of services delivered to our customers.

Supply chain: The products and services (including labour) that contribute to Keolis ANZ's own services. This includes subcontractors and products and services sourced in Australia or overseas and extends beyond Keolis ANZ's Tier 1 suppliers or subcontractors.

The vast majority of our supplier spend relates to goods and services suppliers and subcontractors who are based in Australia.

RISK OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAIN

Keolis ANZ Bus as our largest employer and supply chain user, conducts a review of suppliers to identify instances and risk factors of modern slavery. Suppliers which were new and in higher risk industries or locations were selected for further analysis. While no instances of modern slavery were identified through this process. Keolis ANZ is committed to continuing the review and investigation of potential instances of modern slavery.

OPERATIONAL RISK – KEOLIS ANZ'S WORKFORCE

We consider operational risk within Keolis ANZ to be inherently low due to its geographical location. Keolis ANZ employs more than 3,000 people, primarily based in Australia. They are employed under Australian laws and regulations and are largely subject to union oversight and unionised agreements.

The profile of Keolis ANZ's workforce at the end of FY25 is shown below.

EMPLOYEES BY EMPLOYMENT TYPE

	FY24	FY24 %	FY25	FY25 %
Permanent – Full & part time	5,627	89.7%	2,954	85.0%
Casual and Fixed term contract	649	10.3%	523	15.0%
Total	**6,276**	**+2%**	**3,477**	**-44.6%**

Note, the loss of Yarra Trams as of December 1 2024 explains the drop in numbers

Through our HR teams and trusted external advisors, we are committed to ensuring we meet all employment obligations; whether arising under statute, collective agreements or modern awards. This is achieved by conducting regular reviews and audits, a thorough analysis of terms and conditions built into our payroll systems and by quickly remedying any issues identified. Group entities also conduct appropriate background security checks on prospective employees.

Keolis ANZ's Business Integrity Policy provides a mechanism for grievance reporting via any senior manager or officer of the company. In addition, the 'Our Voice' whistleblower service allows our employees, subcontractors and suppliers to make an anonymous report of inappropriate, illegal, corrupt or unethical behaviour, which may include instances of modern slavery and labour exploitation.

Because of these factors we consider operational risk within Keolis ANZ's workforce to be inherently low.

SUPPLY CHAIN RISK

After successfully applying our risk-based approach to identifying modern slavery risks in previous Financial Years, we again used this methodology to assess risk factors and prioritise areas for monitoring in Financial Year 2025. Suppliers were categorised and assessed as high, medium, or low risk for modern slavery practices.

General goods and services again comprised the largest category. This category is considered more at risk than other categories although this is mitigated by service based procurement being largely in-house and outsourced services will be monitored through induction of staff. Procurement relating to employee uniforms, cleaning and IT services were classified as potential risk areas.

Capital purchases were made almost exclusively from Australian based companies. Keolis ANZ is cognisant that materials and/or additional labour used within the manufacture of these capital items may have been sourced from overseas, where there is a potential risk to Keolis ANZ of indirect association with modern slavery practices.

Geographically, we used the WalkFree Global Slavery Index2, the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor3and third Party's Corruption Perception Index

we have classified the location of most of our suppliers as low risk. We have only considered China as a medium risk country.

Given the complexity of our supply chain, we do not have visibility over our Tier 2 and 3 suppliers to the same extent as our Tier 1 suppliers. We are examining ways to gain greater transparency beyond our direct suppliers to better understand the risk of modern slavery practices in our supply chain. This is an ongoing focus for us.

The Keolis ANZ bus division has the largest spend on suppliers and a Modern Slavery Risk assessments were conducted on companies considered to be higher risk suppliers. This included using information collected and contained in the Keolis global software (Ecovadis) after the MSS group agreed on the 6 highest potential risky suppliers.

The reviews of various goods and services including bus supply, spare parts, communications and systems integration. In all cases they showed no flags via the independent third-party due diligence and compliance platforms used. Five of the six suppliers were not mandated to produce a Statement (one Australian supplier has a registered Statement and another US based supplier had published its first global statement on modern slavery). All references indicated policies and employment practices that mitigated Modern Slavery risks.

A procurement to source an IT Management Services provider (a category considered to be at higher risk of Modern Slavery practices due to enabling greater cross-border exploitation due to digital environments) was conducted by Keolis ANZ group in 2024. Tenderers were requested to complete a comprehensive Modern Slavery Questionnaire outlining the company's practices (including policies, reporting obligations, mapping of supply chains, screening of prospective suppliers and training within the organisation) to ensure the risk of Modern Slavery in their operations or within their broader supply chain was minimised.

A separate criterion in the evaluation of tenders was scored based on the responses received. In 2025 this contract has remained in place with no reported issues.

SUBCONTRACTORS AND LABOUR HIRE

Keolis ANZ engages subcontractors and labour hire providers across our operational locations. We are aware that modern slavery risks may not be immediately visible within this network. Labour hire contracts require Keolis ANZ contractors to comply with industrial relations obligations under the Fair Work Act and not engage in unethical work practices.

Services procured relating to maintenance, subcontractor and professional services were exclusively performed within Australia, the majority of which were performed by qualified professionals. This category was considered low risk. Our supply agreements also have modern slavery clauses.



CLEANING SERVICES

The cleaning industry can be highly susceptible to modern slavery risks, via common practices such as subcontracting, employment of migrant workers, as well as the high volume, time pressured and often base-skilled nature of the work itself. The industry has historically been classified as 'high risk'.

Keolis ANZ recognises this risk and uses certain suppliers for the provision of cleaning services, most of which are major Australian-owned/operated and all operating primarily or exclusively within Australia to provide services. Suppliers are expected to maintain fundamental labour and human rights standards and comply with all applicable laws and regulations of the jurisdictions in which the suppliers are doing business, including employment laws, maintain just and decent working conditions, share Keolis ANZ's respect for the environment and implement sound security measures.

Keolis ANZ has reviewed the Modern Slavery Statement of suppliers where available.

We also take additional action, such as the inclusion of explicit obligations in respect to modern slavery in new contracts with suppliers and subcontractors. This includes the right for Keolis ANZ to take meaningful steps should those obligations be breached.



Criteria D
Assessment of our Modern Slavery risks and process to address

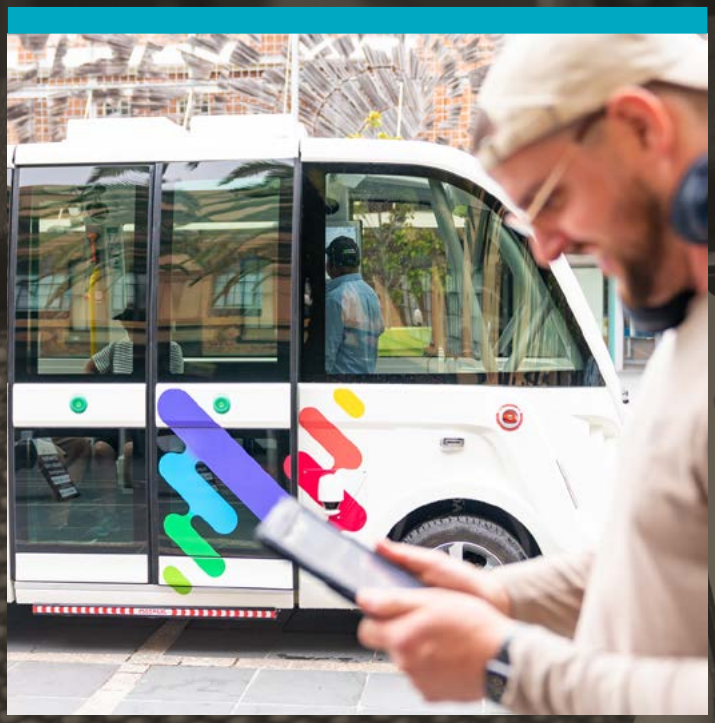
Our approach

Keolis ANZ implements a four-stage mitigation approach in dealing with modern slavery risk.

These stages are:

1. **Policies and framework:** Our Modern Slavery Statement is supported by Keolis ANZ policies based on the Group Keolis "Konformite" program which incorporates human rights, employee conduct, supplier conduct, sustainable procurement and modern slavery.
2. **Processes, procedures and standards:** Our policies and framework are supported by procedures and standards to prevent modern slavery occurring within our supply chain. These include:
   - Employee training including at induction related to Modern Slavery and other employment and business policies;
   - Improvement of our Procurement processes and further training of procurement and contract management staff;
   - Supplier and subcontractor prequalification in line with procurement processes;
   - Standard terms and conditions for supply agreements and subcontracts, including our purchase order terms and conditions;
   - Supplier due diligence.
3. **Governance:** Strong governance assures compliance with our policies, framework, processes, procedures and standards. Keolis ANZ employees, suppliers, contractors and consultants can raise concerns about modern slavery through our formal whistleblower process.
4. **Continuous improvement:** Keolis ANZ is committed to continually enhancing our approach to modern slavery. Keolis ANZ's progress in Financial Year 2025 is set out below while our focus areas for Financial Year 2025 are outlined in Criteria G – Looking Forward.





During 2025, Keolis ANZ took the following steps to mitigate the risk of modern slavery based on the objectives identified in our FY24 Modern Slavery Statement.

LOOKING BACK: FY2025 OBJECTIVES

Focus Area	Objective	Outcome
Communicate our Modern Slavery commitments internally and externally:	Keolis ANZ modern slavery e-learning general training module to continue to be delivered to all employees including as a part of Keolis ANZ employee induction process;	Completed
Increase our understanding:	Enhanced Keolis ANZ modern slavery procurement training module converted to e-learning and delivered to ensure enhanced awareness of modern slavery issues and relevant policies, in order that breaches of Keolis policies can be identified and reported.	Training developed but not fully rolled out
	Modern slavery training content to be included in the Keolis ANZ site-based induction process for suppliers working at each site.	Completed
Improve systems and processes to comply with Keolis Policies:	Continue to review and progressively build in specific modern slavery terms and conditions into our procurement templates and supply contracts as each of them are varied or renewed.	Continuing
Better understand our supply chain:	Further assessment and monitoring of higher-risk suppliers and/or Tier 2 suppliers;	Completed
	Explore whether supplier risk and compliance assessment can be enhanced through Keolis ANZ group wide use of a technological platform solution.	Continuing – to be reassessed by Group following separation of Yarra Trams.



Criteria E
Assessing the effectiveness of our actions

ASSESSMENT AND EFFECTIVENESS OF OUR ACTIONS

Keolis ANZ's Modern Slavery Working Group is comprised of members of the operations, finance, legal, procurement and communications departments from the Group's operating entities. This group met routinely through 2022 until January 2025. With the removal of Yarra Trams from the business, the actions were worked on, but the working group was disbanded. It is expected to be re launched in 2025/26 financial year.

It has oversight to

- Provide for regular engagement and feedback between key functions;
- Tracking actions and measuring the impact of our actions;
- Review the effectiveness of Keolis ANZ's Modern Slavery controls and provide a forum for regular engagement and feedback;
- Monitor training development and deployment;
- Check risk assessment processes to ensure they remain up to date;
- Oversee internal audits, supplier agreements, and results of supplier prequalification;
- Review any feedback in relation to any potential Modern Slavery risks identified and subsequent course of action to remediate;
- Review policies relevant to modern slavery.

By their nature, these actions are expected to continue, providing a basis for internal and external reporting of our progress.

Keolis ANZ's Modern Slavery working group conducted regular meetings to discuss the effectiveness of actions taken and continues to mature our risk management framework.

In 2024/2025 no actual instances of modern slavery were identified via our assessments, due diligence processes, or through our grievance procedures or whistleblower processes.



Criteria F
Consultation process

CONSULTATION WITH OTHER ENTITIES

The Keolis ANZ Modern Slavery Statement is a result of consultation and collaboration between Keolis ANZ operating entities and Keolis ANZ shareholders.

Through our Keolis ANZ Modern Slavery Working Group, we maintain an ongoing dialogue with our controlled entities to ensure alignment with our Modern Slavery commitments. This includes:

REGULAR MEETINGS

Holding regular meetings to discuss modern slavery risks and mitigation strategies. These meetings provide a platform for sharing information, addressing challenges, and coordinating efforts.

SHARED TRAINING PROGRAMS

Implementing shared training programs across all entities to ensure consistent understanding and application of policies. These programs are able to be tailored to the specific needs and contexts of each entity.

COLLABORATION AND SUPPORT

Offering ongoing support and resources to subsidiaries and controlled entities to help them address modern slavery risks. Each Keolis ANZ operating entity representative on the Modern Slavery Working Group monitors their respective controlled entity's compliance with and support Keolis ANZ's modern slavery positions, including compliance with all relevant legislation, adoption of procurement-related standards and polices and training.

KEOLIS SHAREHOLDER GROUP

Keolis Downer's General Counsel shares Keolis ANZ's Modern Slavery Statement with the Keolis Global Legal Steering Committee. This provides an opportunity to collaborate on Group compliance and procurement policies and to benchmark on developing global standards in this area.

DOWNER SHAREHOLDER GROUP

Keolis Downer consults with Downer's Group Procurement & Strategic Sourcing members to ensure alignment on Modern Slavery matters.

INDUSTRY ASSOCIATIONS

Keolis Downer's Modern Slavery Working Group is represented on the Australasian Railway Association (ARA) Modern Slavery Network. Group members regularly attend and participate in Network meetings.



Criteria G
Looking forward

Looking forward: FY2025 Objectives

Focus Area	Objective
Communicate our Modern Slavery commitments internally and externally:	Communicating with senior leadership teams within Keolis ANZ operating entities to reinforce knowledge of our Modern Slavery obligations and report on activities of the Keolis ANZ Modern Slavery Working Group.
	Communicating with smaller (non-reporting) suppliers in relation to identification of Modern Slavery and Keolis ANZ's obligations.
Increase our understanding:	Provide ongoing training to procurement and contract management specific staff.
	Communicate Modern Slavery reporting process internally.
Improve systems and processes to comply with Keolis ANZ's Policies:	Continue to review and progressively build in specific modern slavery terms and conditions into our procurement templates and supply contracts as each of them are varied or renewed.
	Explore the rationalisation of procurement processes across the group including standardising supplier prequalification process.
Better understand our supply chain:	Further engagement with our suppliers including working with Tier 1 supplier in a high risk category to review Tier 2 suppliers.
	Reassess whether supplier risk and compliance assessment can be enhanced through Keolis ANZ group wide use of a technological platform solution (following separation of the KDR Victoria business).

CURRENT AND FUTURE LEGISLATIVE CLIMATE

The Commonwealth Modern Slavery Act (2018) was reviewed during FY24. Following an extensive consultation period, 30 recommendations were brought to Government for consideration. A bill, the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 was introduced to establish a Federal Anti-Slavery Commissioner on 30 November 2023. The core functions of the Anti-Slavery Commissioner include supporting victims of modern slavery and supporting businesses to address the risks of modern slavery in their operations and supply chains. The bill was passed by the Government on 28 May 2024. At present, this is the only recommendation resulting from the review of the Modern Slavery Act that has been passed by Government.

Certification & Appendix

CERTIFICATION BY DIRECTORS

This statement was approved by the Board of Keolis ANZ Pty Ltd.

Signed



Director
Keolis ANZ Pty Ltd

APPENDIX

1. **Other Group Entities**
   Keolis Gold Coast Pty Ltd ACN 150 236 936
   KDR Victoria Services Pty Ltd ACN 169 448 382
   Keolis Bus and Coachlines Property Pty Ltd ACN 604 655 834
   Hornibrook Transit Management Pty Ltd ACN 010 693 348
   South West Transit Pty Ltd ACN 077 811 253
   Australian Transit Enterprises Pty Ltd ACN 066 987 086
   Hornibrook Bus Lines Pty Ltd ACN 010 013 224
   Path Transit Pty Ltd ACN 074 765 692
   Southlink Pty Ltd ACN 067 806 544
   Link SA Pty Ltd ACN 131 552 415
   Keolis Downer Hunter Pty Ltd ACN 614 205 766
   Keolis Downer Northern Beaches Pty Ltd ACN 621 012 717
   Keolis South Australia Pty Ltd ACN 644 358 234
2. https://www.globalslaveryindex.org/2018/findings/highlights/
3. https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print



KEOLIS ANZ

Level 2, Suite 2.03
55 Clarence Street Sydney NSW 2000

E: communications@keolis.au

keolis.au

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