

2025  
Modern Slavery  
Statement



**Disclaimer**

Whilst Aurizon has endeavoured to ensure the accuracy of the information contained in this document at the date of publication, it is general in nature and does not purport to be complete or error free. Any information in this document is subject to change without notice. Except as required by applicable regulations or law, Aurizon is not under any obligation to review or update this document to reflect events or circumstances that arise after publication.

**Acknowledgement of Country**

We acknowledge the Traditional Custodians of the lands, and pay our respects to the Elders past, present and future, for they hold the memories, the traditions, the culture and hopes of Aboriginal Australia. We must always remember that the land under the ballast, sleepers, rail systems, and office buildings where Aurizon does business was, and always will be, traditional Aboriginal land.

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Appendix 1

# Introduction

**Aurizon is committed to supporting and respecting the protection of internationally proclaimed human rights, laws and standards.**

As Australia’s largest rail freight operator, we uphold this commitment through Aurizon’s Human Rights Policy.

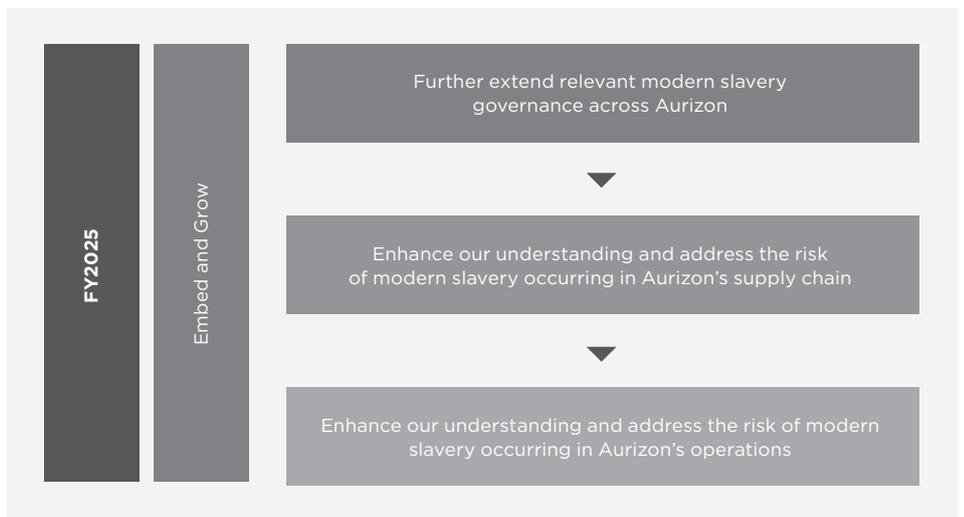
Aurizon’s Values and Code of Conduct support our firm commitment to safety, lawful and ethical conduct, respect for others, and responsibly consider the community and environment in decision-making.

## Our focus in FY2025

The focus in FY2025 has been to embed and grow our governance. Initiatives undertaken this year are detailed in the ‘Actions taken to assess and address the risks of modern slavery’ section of this modern slavery statement.

**This is our sixth statement, made pursuant to the *Modern Slavery Act 2018 (Cth) (the Act)*. It reports on the risks of modern slavery in Aurizon’s operations and supply chains, the actions taken to identify and address those risks during the financial year ended 30 June 2025, and how we will continue to assess the effectiveness of our actions.**

**Figure 1** FY2025 Modern Slavery Roadmap Initiatives



**Figure 2** Key achievements



Table 1 Mandatory criteria

Mandatory criteria	Section in statement	Page
1. Identify the reporting entity.	Our business	6
2. Describe the reporting entity's structure, operations and supply chains.	Our business – Our structure, Our operations, Our people, Our supply chain	6 to 9
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks of modern slavery in our supply chain and operations	10 to 12
4. 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.	Actions taken to assess and address the risks of modern slavery	13 to 16
5. Describe how the reporting entity assesses the effectiveness of these actions.	Assessing the effectiveness of our actions	17
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Our business – process of consultation with reporting entities	6

# Our business

## Aurizon (ASX: AZJ) is Australia’s largest rail-based transport business and an ASX-listed company.

Using largely centralised functions, policies and procedures, the Aurizon Group operates in an integrated manner, governed by the Aurizon Holdings Executive Committee and Board of Directors (the principal governing body of the parent entity of the Aurizon Group) who oversee operations and risk in each subsidiary entity of the Aurizon Group. References to ‘Aurizon’, ‘we’ or ‘our’ in this joint statement are references to the entities making up the Aurizon Group.

### Our structure

This joint statement is made by Aurizon Holdings Limited ACN 146 335 622, a company headquartered in Queensland, and entities it owns or controls that are reporting entities for the purposes of the Act. These entities, and the entities that those reporting entities own or control, including entities acquired during the reporting period (collectively, the Aurizon Group), are identified in Appendix 1: Aurizon Holdings Limited group structure.

### Our operations

Our key operational areas comprise Operations (Coal, Bulk, Containerised Freight) and Network.

#### Operations

Our Coal business provides a critical service to Australia’s \$72 billion<sup>1</sup> export coal industry, the nation’s second largest source of export revenue in FY2025.

Demand is linked to Asian steel production and energy generation. Aurizon has the largest rail fleet in Australia and is the only operator with services to all nine coal export ports on Australia’s east coast. The Bulk business delivers full supply chain solutions, including haulage, terminal storage and handling, and stevedoring for commodities, such as iron ore, alumina, copper and grain. The Bulk business

### Process of consultation with reporting entities

Due to the integrated nature of our operations, we take an enterprise-wide approach to our modern slavery response. Accordingly, our Modern Slavery Statement has been prepared in consultation with stakeholders across the Aurizon Group, including Procurement, Corporate Affairs, People & Development, Legal, and Governance, Risk & Assurance.

This statement has also been prepared through a process of consultation with the Aurizon Holdings Executive Committee and Board of Directors (the principal governing body of the parent entity of the Aurizon Group), as well as Aurizon Modern Slavery Working Group. Consultation has occurred with representatives (being executives and the Board of Directors) of reporting entities in relation to the development of this statement. The Aurizon Holdings Executive Committee has endorsed this statement, and the Board of Directors has approved it.

Figure 3 Aurizon’s FY2025 summary



<sup>1</sup> Australian Bureau of Statistics.

also includes 2,460 kilometres of track infrastructure in South Australia and the Northern Territory. During FY2025, Aurizon acquired Flinders Logistics Pty Ltd (renamed Aurizon Port Services (SA) Pty Ltd) and its subsidiary Pirie Bulk Pty Ltd (renamed Aurizon Pirie Logistics Pty Ltd), providing stevedoring, logistics and warehousing services to importers and exporters of bulk commodities at Port Adelaide and Port Pirie in South Australia.

Our Containerised Freight business provides rail linehaul services for customers in the interstate freight market, in addition to imported freight via the Port of Darwin (land-bridging).

**Network**

We hold the long-term lease for and operate the Central Queensland Coal Network (CQCN), a critical piece of infrastructure supporting about 90% of Australian steel-making coal export volume.

The CQCN connects over 40 mines to five export terminals, as well as to domestic customers across 2,670km of multi-user track. Around 70% of volume hauled across the network is steel-making coal (the other 30% is thermal coal), and around half of all global seaborne export steel-making coal travels across the network.

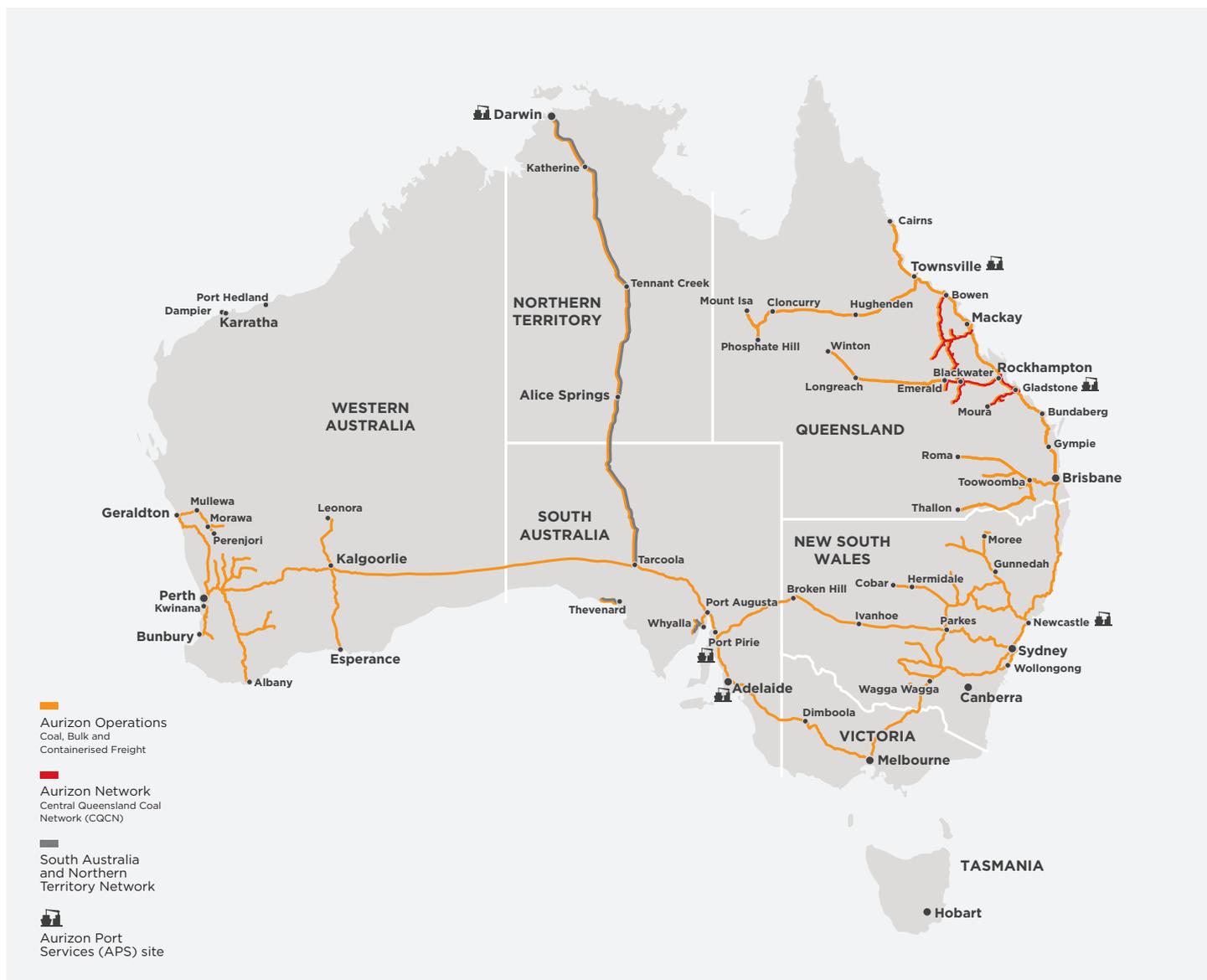
**Our people**

At Aurizon, our people are our greatest asset. We have approximately 6,000 employees living and working across our national footprint of operations.

Our purpose - growing regional Australia by delivering bulk commodities to the world - is underpinned by a workplace culture of connection to enable great outcomes.

Through our commitment to safe and efficient delivery for our customers, we are building our workforce for the future. This includes investing in our people and partnerships and creating an inclusive workplace.

Figure 4 Aurizon's operations, as at 30 June 2025



## Our supply chain

Aurizon's supply chain is complex and multi-tiered. Our tier 1 suppliers are those we engage directly, while our tier 2 and beyond suppliers are those who provide our tier 1 suppliers with goods or services. The geographical split of our supply chain is detailed in table 2. We recognise that this might not be indicative of the original source location of the products or services procured. The need to gain more transparency into our supply chains is discussed below in 'Tier 2 and beyond suppliers'. Table 3 details the five largest categories of direct external spend incurred across our operations, which are the same as FY2024.

**Table 2** Tier 1 suppliers

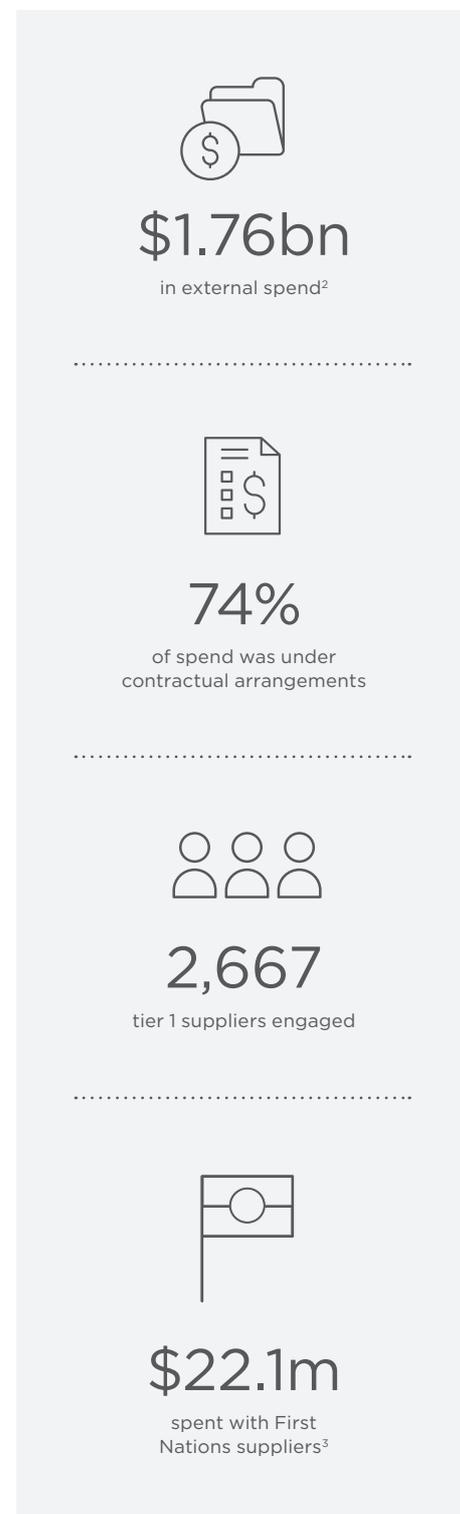
Continent	Australia	Asia	Europe	North America	Oceania
Spend %	98.7%	0.56%	0.36%	0.33%	0.04%

**Table 3** Five largest spend categories for FY2025

Category	% External spend	Sourcing locations <sup>4</sup>	Tier 1 suppliers
<b>1. Rollingstock equipment &amp; services</b>			
Assets, parts, and maintenance services, which comprises purchasing and servicing of one of Aurizon's key asset groups.	20.5%	Australia, Barbados, China, Hong Kong, USA	824
<b>2. Fuel</b>			
Lubricant and fuel used in our locomotives and equipment.	20%	Australia	85
<b>3. Construction and maintenance services</b>			
Services to support the maintenance of our rail infrastructure, i.e. civil construction and electrical infrastructure.	9.3%	Australia, Hong Kong, Singapore, UK, USA	244
<b>4. Facilities management</b>			
A range of services to support our real estate portfolio, including managed services, cleaning, waste, and trade services.	6.0%	Australia, New Zealand, USA	381
<b>5. Information, communication and technology</b>			
Our technology architecture of hardware, infrastructure, services, software, and telecommunications.	5.9%	Australia, Singapore, various European countries, UK, USA, Israel, New Zealand, United Arab Emirates	289

The remaining ~38% of spend is in the following categories: asset renewals, corporate (goods and services), energy and labour services, plant, equipment, freight & logistics, materials & engineering.

**Figure 5** Aurizon's FY2025 performance



<sup>2</sup> Excludes government charges, access fees, etc.

<sup>3</sup> Tier 1 & Tier 2 Supply Nation-verified Indigenous businesses.

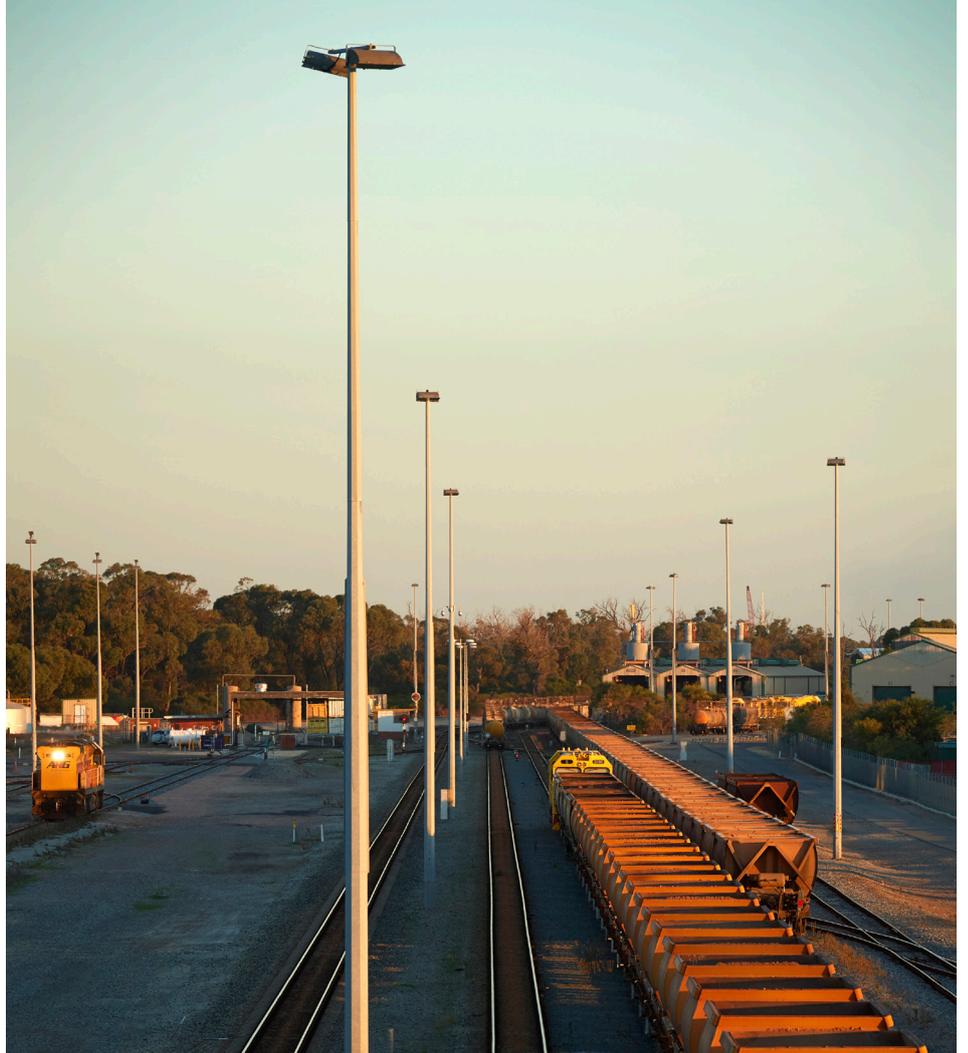
<sup>4</sup> Source location is determined by the domicile of the legal entity.

### Tier 2 suppliers

Supply chains – including Aurizon's – are complex, multi-tiered logistics systems. Due to these complexities, we acknowledge that our understanding of suppliers in tier 2 and beyond is not as comprehensive as it is for our tier 1 suppliers. We continually seek innovative ways to enhance our understanding, alongside our general due diligence, including utilising our risk assessment tool and engaging in supply chain visibility activities. Insights gained through these activities in this reporting period are detailed in the 'Actions taken in our supply chain' section.

### **Our local procurement**

Given the regional footprint of our business, we recognise the importance of contributing as partners in the communities in which we operate. An important aspect of our local procurement is our engagement with First Nations suppliers<sup>5</sup>. Working with these suppliers is one way that we support advancing the socio-economic opportunities of the communities in which we operate. In FY2025, of our tier 1 spend with these suppliers, 76% was within construction and maintenance services (primarily civil infrastructure and vegetation management services).



**Gaining more transparency into our supply chain means working in collaboration with our tier 1 suppliers to better understand our risks.**

<sup>5</sup> Supply Nation-verified Indigenous businesses.

# Risks

## Our governance and due diligence processes

Our Modern Slavery and Human Rights Due Diligence Framework (Modern Slavery Framework) is supported by various standards and procedures that govern our approach to conducting business, including, but not limited to:

- Human Rights Policy
- Whistleblower Policy
- Aurizon Code of Conduct; Supplier Code of Conduct
- Procurement Commitment; People Commitment; Governance, Risk and Assurance Commitment
- Enterprise Risk Management Framework & Appetite.

Key elements of our due diligence include:

- **Modern Slavery Decision Framework**, to provide guidance on the appropriate response to a potential modern slavery risk or an identified incident of modern slavery.
- **Modern Slavery Supply Chain Due Diligence Procedure**, to detail the critical steps, requirements and accountabilities for assessing the potential risk of modern slavery in Aurizon's direct suppliers.
- **Third-party risk assessment platform (risk assessment tool)**, to support the risk monitoring and assessment of our suppliers.
- **Supplier Assessment Questionnaires (SAQs)**, to help us measure a supplier's maturity in relation to human rights and to understand supply chain visibility.
- **Two-way dialogue and collaboration** with our suppliers, to support successful engagement, knowledge sharing and risk mitigation.

## Risks of modern slavery in our supply chain and operations.

Our Modern Slavery and Human Rights Due Diligence Framework is key to identifying and managing risks in our supply chain and operations.

**Table 4** Segmentation of highest risk suppliers by category

Category	Supplier risk: High	Supplier risk: Very High
Rollingstock equipment	4	1
Plant and equipment	1	1
Information technology	2	

In FY2025, we formalised a due diligence process for our subsidiaries. Further details of this action are provided in the 'Actions taken in our operations' section.

## Modern slavery risks in our supply chain

### Tier 1 suppliers

Recognising that risk is dynamic, we use our risk assessment tool to help monitor our suppliers and associated risks.

Every year, we assess our active tier 1 suppliers to identify our highest risk categories. Our FY2025 assessment confirmed that our two key categories with a potential for us to contribute to or be directly linked to modern slavery remain unchanged from FY2024:

1. **Rollingstock equipment** – risk of forced labour and human trafficking due to long, complex and non-transparent supply chains, and geographical risks based on the country of origin.
2. **Plant and equipment** – risk of forced labour and human trafficking due to characteristics of complex supply chains and reliance on low-skilled labour/products from countries with lower labour standards or limited enforcement capacity.

In FY2025, we had two very high and seven high-risk suppliers who are active in Aurizon's systems<sup>6</sup>. These ratings are determined by a combination of country and industry risk within our risk assessment tool.

The increase of three high-risk suppliers in FY2025 was due to new supplier engagement requirements. Due diligence on these suppliers resulted in SAQ requests or purchasing blocks.

As reported in FY2024, due diligence has already been recently undertaken on the existing six very high and high-risk suppliers. This due diligence took the form of SAQ requests, commissioning of third-party audits, or purchasing blocks.

**Our Modern Slavery Framework is underpinned by the United Nations Guiding Principles on Business and Human Rights.**

### Tier 2 and beyond suppliers

Since our due diligence activities on our supply chain began, we have adopted a range of approaches to improve our understanding of our supply chain, from trade data reviews of rollingstock equipment sub-suppliers (FY2022) to modern slavery statement reviews of major suppliers (FY2023).

More recently, we have taken the approach of working with selected critical tier 1 suppliers in supply chain mapping workshops. In FY2024, we received positive feedback from those involved in this approach. Due to the complex nature of these supply chains, these meetings were an effective way to gain insightful information on our supply chain and were continued in FY2025. There are more details of this work in the 'Actions taken in our supply chain' section.

### Modern slavery risks in our operations

We recognise that modern slavery risks are a global issue and are not limited to specific countries or regions. As an Australian-operated entity, it is crucial for us to continually review our operational practices for indicators that could potentially cause, or contribute to, modern slavery<sup>7</sup>.

The controls outlined in table 5 provide Aurizon with the tools to support the identification of potential modern slavery risks in our operations, ensuring we can assess and address those risks as they may arise.

During FY2024, we completed an SAQ on behalf of the Aurizon Group, which resulted in the overall risk score of 'very low'. There have been no material adverse

changes to Aurizon's controls during FY2025 that could increase this risk score.

Considering these safeguards and assessment result, we continue to conclude that the likelihood of Aurizon causing or contributing to modern slavery in our operations is low.

Two new subsidiaries were acquired during FY2025, as set out in the 'Our operations' section above. Due to the timing of the action relating to Aurizon's new Modern Slavery Subsidiary Due Diligence Procedure (as detailed in the 'Actions taken in our operations' section), the operations of these subsidiaries had not been formally assessed in line with the procedure at the end of the reporting period. This assessment will be completed and reported in FY2026.



Table 5 Risks in operations

Risk area	Potential risk	Controls
<p><b>Direct workforce</b></p>	<p>Cause modern slavery where our actions or omissions directly result in modern slavery harm occurring.</p> <p><i>Aurizon could cause modern slavery, including if Aurizon subjected workers to exploitative conditions that meet the threshold for modern slavery.</i></p>	<ul style="list-style-type: none"> <li>● Corporate Governance Framework – designed to promote responsible management and conduct of Aurizon.</li> <li>● Modern Slavery Working Group – cross-functional group with subject matter experts from Procurement, Human Resources, Legal, Governance, Risk &amp; Assurance. The key purpose of the Working Group is to support the execution of modern slavery program actions and reporting requirements.</li> <li>● Modern slavery training – awareness training covering topics such as defining and describing modern slavery, identifying who may be at risk, key considerations for purchasing goods and services, and Aurizon’s commitments. This is available to all employees, with mandatory completion required for those who can influence operations and the supply chain.</li> <li>● Enterprise agreements/contracts – Aurizon’s direct workforce is covered by individual employment contracts, modern awards and enterprise agreements, which contain at least minimum pay and entitlements.</li> <li>● Recruitment and onboarding processes – procedures in place to ensure that recruitment and appointment practices are fair, and aim to achieve the objective of equal opportunity in accordance with Aurizon’s Inclusion &amp; Diversity Policy.</li> <li>● Employee grievance mechanism – the Employee Grievance Procedure details the principles, process and accountabilities for resolving employee grievances.</li> </ul>
<p><b>Indirect workforce</b></p>	<p>Contribute to modern slavery, where our actions or omissions significantly incentivise, enable, or facilitate modern slavery harm occurring.</p> <p><i>Aurizon could contribute to modern slavery, including if Aurizon’s suppliers engaged low-skilled labour to provide IT services, cleaning or facilities management services, and these workers were exploited.</i></p>	<ul style="list-style-type: none"> <li>● Supply chain due diligence – formalised process and monitoring via our risk assessment tool, supplier audit and SAQs.</li> <li>● Supplier Code of Conduct and contract clauses – the Supplier Code of Conduct outlines Aurizon’s expectations for its suppliers across several key areas. These include safety, labour and human rights, business integrity, community engagement, and environmental responsibility.</li> <li>● Our contract templates include clauses relevant to human rights compliance, including requiring that suppliers not engage in modern slavery or conduct that is inconsistent with recognised international human rights. If Aurizon deemed a supplier in breach of these clauses, the relevant contract owner should follow the internal Supplier Issue Escalation Procedure. This procedure details the critical process steps, requirements and accountabilities for dealing with issues that may be encountered when transacting with Aurizon suppliers.</li> </ul>

# Actions taken

## Actions taken to assess and address the risks of modern slavery.

In line with our three-year plan, our focus in FY2025 has been to embed and grow our modern slavery governance across Aurizon.

### Actions taken in our supply chain

We continue to take a targeted approach to modern slavery risks in our supply chain, recognising that we need a sustainable strategy. Key actions completed during FY2025 on our supply chain include the following:

#### Continued expansion of due diligence activities with suppliers

Supplier Assessment Questionnaires: During FY2025, 34 SAQs were issued in line with the criteria outlined in our Supply Chain Due Diligence Procedure. These suppliers were issued the SAQ via our risk assessment tool and, based on responses, all received an overall risk score of low or very low. Key insights into the SAQs are summarised in table 6.

Continuous Improvement Actions: During FY2025, we implemented system-generated continuous improvement actions into our SAQ process. Table 7 shows the relevant key insights. Overall, most suppliers had initiatives in place supporting modern slavery due diligence and maturity. More details on this implementation are offered in 'Actions taken in our operations' section.

Two suppliers failed to complete our SAQ request by the end of the reporting period. While the risk rating of these suppliers was Medium, we will follow up each supplier in FY2026 to assess their approach and maturity to modern slavery risks.

FY2024 Follow-ups: During the previous reporting period, we identified three suppliers who did not respond to our SAQ request. After we followed up these suppliers in FY2025, they completed their SAQs. None of them returned any high-risk results or continuous improvement actions.

Table 6 FY2025 SAQ key insights

% respondents 2025	% respondents 2024	Insight
81%	75%	Have assessed the risks relating to modern slavery in their operations and/or supply chain
56%	67%	Have a process for evaluating and selecting suppliers, with consideration of human and labour rights practices
44%	55%	Were reporting entities under modern slavery legislation
93% of the 44%	85% of the 55%	Report under Australian legislation, <i>Modern Slavery Act 2018</i> (Cth)
56%	56%	Have operational sites outside Australia
1. New Zealand 2. USA 3. Canada and China	1. USA 2. New Zealand 3. China and UK	Top site locations
50%	80%	Provide human rights and modern slavery training to employees or employees and suppliers

Table 7 Key insights

Continuous Improvement Actions	
Suppliers with improvement opportunities identified	9
Total improvement opportunities identified	11
Feedback on Modern Slavery maturity and controls	85
Non-preferred response, requiring follow-up	1

With supply chain due diligence procedures finalised in FY2024, our approach to SAQs is embedded in our procurement processes. With this risk-based approach, the number of SAQs issued to suppliers will fluctuate in line with requirements set out in the procedure.

Following our due diligence efforts this year, we found no evidence of modern slavery within our current supply chain. However, we recognise that because there is still a possibility of being directly linked to modern slavery through our supply chain, our continued due diligence will help to make the process more transparent.

**New subsidiary supplier due diligence**

During FY2025, two new subsidiaries entered the Aurizon Group, as detailed above in the ‘Our operations’ section. In line with our Supply chain due diligence procedure, all new suppliers onboarded through these two subsidiaries were integrated into our risk assessment tool. All suppliers returned a risk rating between Low and Medium.

These suppliers will be subject to further due diligence, as required, under our Modern Slavery Framework.

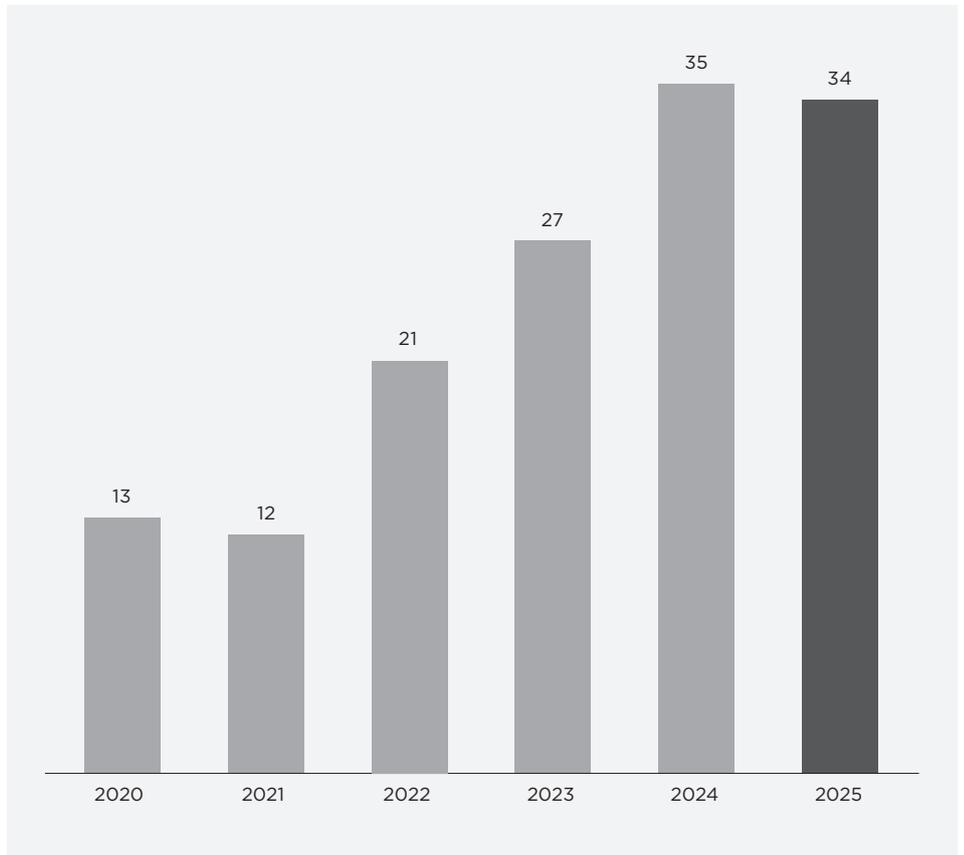
**Supply chain transparency (tier 2)**

In FY2025, we continued our supply chain mapping workshops. Within our Rollingstock category, we worked with two critical suppliers who provide Aurizon with rollingstock (wagon) components and services.

These workshops provide valuable insights into our tier 2 suppliers who contribute to the supply chains of key equipment we need to deliver services to our customers.

Leveraging our risk assessment tool, we used the information obtained through these workshops to analyse the risk level based on geographic location and industry of the suppliers.

**Figure 6** SAQs issued through due diligence activities



The findings from this review are presented in table 8.

**Table 8** Tier 2 findings

Category	Details	Risk level	Modern slavery risks	Key risk indicators
Supplier location	Australia (67%)	Very low	Forced labour, forced marriage <sup>8</sup>	—
	China (33%)	High	Forced labour, forced marriage <sup>8</sup>	—
Supplier industry	Industrial machinery	Very low	Forced labour, slavery <sup>8</sup>	Complex supply chains, low-skilled labour

Based on the information available to us and the guidance of the Global Slavery Index 2023, our risk assessment tool, and supplier SAQs, we concluded that there is a Medium risk of modern slavery with these tier 2 suppliers.

We will continue to work with our suppliers using similar forums, where suitable, to support our continuous improvement in our tier 2 supply chain transparency.

**Monitor supply chain risk**

Aurizon continues to monitor the potential impact of key supply chain risks on our business (such as shipping disruptions, cyber security risks, global tensions) through news, expert commentary, and information from our suppliers.

By monitoring these events, Aurizon not only mitigates supply chain risks but also supports our suppliers. This ensures we do not pressure them to increase stock or meet unrealistic deadlines, which could raise the risk of exploiting vulnerable workers in our supply chain.

**Supplier audits**

While no site audits were required during FY2025, we continued to work through the FY2024 audit reports with our key rollingstock suppliers in Australia, USA and Mexico. With close collaboration, all clarifications were completed and each audit closed out.

**Adverse media**

With the transition to our new risk assessment tool completed in FY2025, we are again using a third-party

platform to monitor our suppliers for adverse media. This includes a dashboard for a holistic view of new alerts, and email notifications. Our FY2025 monitoring is summarised below:

- 28 alerts in total, against 18 suppliers
- 6 alerts related to social/labour issues or disputes
- 5 out of 6 resulting in government action
- 1 supplier request for response.

**Actions taken in our operations**

We recognise the importance and value in continually reviewing our operations to ensure our actions remain appropriate and responsive to the potential risks.

Key actions completed on our operations in FY2025 include the following:

**Human Rights Policy update**

Our Human Rights Policy was reviewed, with minor changes to wording to incorporate our updated employee grievance procedure. This update was approved by the Board of Directors (Remuneration and People) Committee.

**People Insights Survey**

Our annual People Insights Survey provides our people with the opportunity to give feedback on their experience working with Aurizon. It enables us to continue to improve in areas that matter most to them at work.

Feedback from our People Insights Survey helped inform several improvements within our business units and functional areas, as well as company-wide initiatives, including:

- Creating Respectful Workplaces: training for employees and leaders to support a better understanding of their role in creating a safe, respectful and inclusive environment.
- Strategic Workforce Planning: continuing to proactively prepare for future workforce skills, developing our people and delivering attraction and retention initiatives.
- Leading for Safety: updating the program to include a focus on psychological safety and ensuring employees feel comfortable to speak up in the workplace.

**Implement efficiencies**

During FY2025, we focused on enhancing our due diligence processes by leveraging our risk assessment tool. This involved implementing system-generated continuous improvement actions and a tracking dashboard.

## If in doubt, speak out. Aurizon’s Whistleblower Policy aligns with our values and our code of conduct.

These actions flag non-preferred responses, provide positive feedback, and identify improvement opportunities based on supplier responses.

SAQ scoring outcomes and actions are visible to Procurement teams and suppliers, which enables them to record dialogue around SAQ responses and clarifications, facilitating efficient two-way communication and collaboration. In the first quarter, post-implementation, we reviewed the system logic and made minor adjustments to improve efficiency (e.g. refining response logic and adding new logic for high-risk scoring).

Additionally, we introduced a dashboard to provide holistic oversight of action statuses, which has been incorporated into regular SAQ reporting.

Training on these improvements was undertaken in early FY2025, as part of SAQ expansion training.

### Increased awareness with Aurizon employees

Awareness initiatives: We continued to engage with our employees on the topic of modern slavery through a variety of internal communication tools, including:

- facilitating due diligence refresher training
- engaging with our Modern Slavery Working Group members monthly through written updates
- issuing all staff communication on the release of Aurizon’s modern slavery statement and commitments
- updating our Procurement Portal (available to all Aurizon employees) with relevant modern slavery-related information, including our FY2025 commitments, Roadmap, access

to contact details for the Modern Slavery Working Group members, and guidance on customer requests for questionnaire completion.

Training: Since developing our online training module in 2021, we have continued to expand the compliance requirement to more Aurizon employees and reviewed training content to align with Aurizon’s current maturity and updated global reporting data.

In FY2025, we applied the updated module to an additional 216 employees, including expansion across Safety, Health and Environment, Technology & Facilities teams. A review was also completed of the existing allocation rules to develop a sustainable approach to training allocation of our commercial and customer teams.

With our Procurement teams, we also continued workshops that were tailored to provide guidance on our due diligence improvements. Throughout the year, ongoing support of these due diligence activities is provided to the Procurement teams, as required.

### Due diligence requirements for new subsidiaries

In line with our Roadmap actions for FY2025, we have formalised a due diligence process for subsidiaries of Aurizon Holdings Limited.

The process requires due diligence to be undertaken on subsidiaries during the following events:

- acquisition of a new entity
- change in majority percentage of control or status of subsidiary
- change in identified controls of subsidiary.

Formalising this process will ensure a consistent approach to the critical process steps of our modern slavery due diligence, which leverages our risk management tool. Consultation was undertaken with the key stakeholders of the process, including the Modern Slavery Working Group.

The finalised document (Modern Slavery Subsidiary Due Diligence Procedure) was published on our enterprise Modern Slavery Sharepoint site and will be rolled out in FY2026.

## Grievance mechanisms

We are committed to ensuring that our employees, contractors, suppliers, and the general community can safely raise concerns about Aurizon’s commitment to upholding and respecting human rights.

Our Whistleblower Hotline is operated by an independent third party. It enables employees, contractors, suppliers, and the general community to anonymously report suspected or actual illegal activity, breaches of company policy, and potential fraud or misconduct. This applies even if the matter does not meet the strict criteria for protection under the *Corporations Act 2001* (Cth).

Aurizon’s Whistleblower Hotline is promoted widely to internal and external stakeholders. It is available publicly on the Aurizon website as well as the Supplier Code of Conduct and our Modern Slavery Statement (MSS). In FY2025, the hotline information was also communicated via our enterprise-wide newsletter, online training module, and supplier information pack. In FY2025, no modern slavery concerns were reported.

# Assessing the effectiveness of our actions

## In FY2025, our focus was to embed and grow Aurizon's governance maturity.

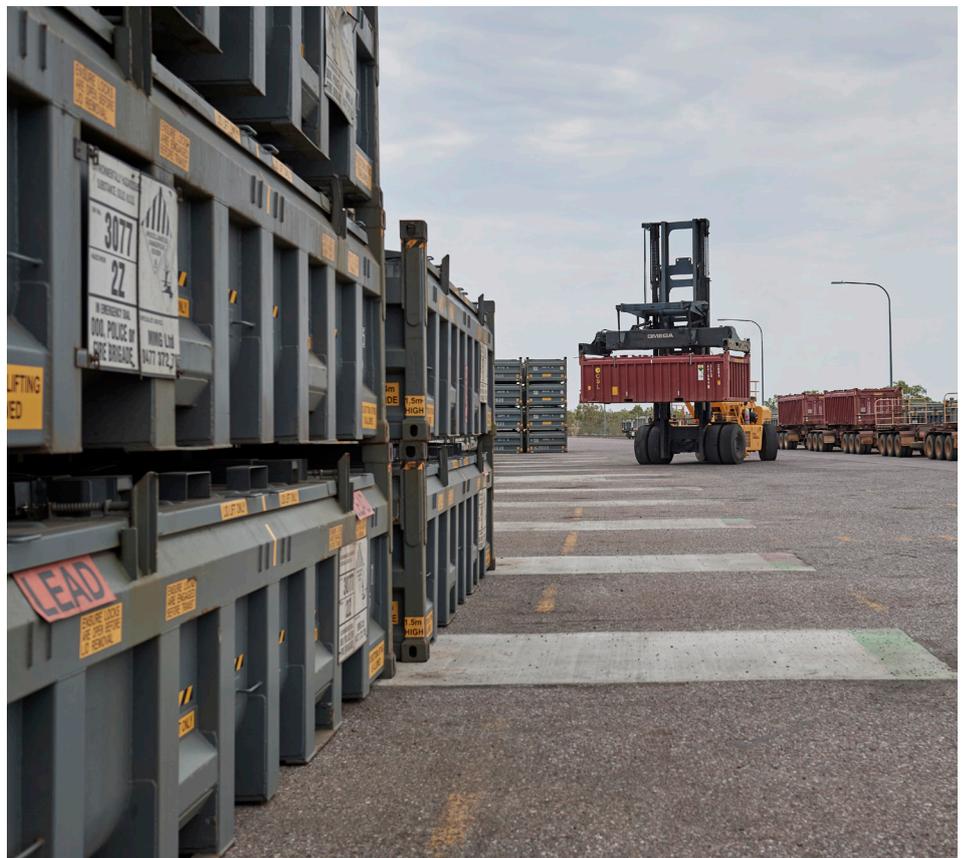
We are committed to enhancing our assessment and management of modern slavery risks within our operations and supply chain, including the way in which we assess the effectiveness of our actions. Initiatives we have used against our key performance areas are outlined below.

### Governance and due diligence

Feedback is an important aspect of our continuous improvement process. We report at agreed intervals throughout the year to key internal stakeholders to seek feedback.

- Aurizon Holdings Executive Committee and Board of Directors:** annual reporting that provides an overview of our actions to address modern slavery throughout the year and our statement for reporting. This ensures our response is appropriate and in line with enterprise expectations.
- Modern Slavery Working Group:** monthly review and support of our modern slavery program and commitments. This helps us review the effectiveness of our governance mechanisms and ensure alignment across the business.

Our efforts during FY2024 to implement our new risk assessment tool and refresh our modern slavery-related policies and procedures enabled us to focus on improvement initiatives in FY2025. Using our risk management tool, we have been able to make our SAQ process more consistent and provide process efficiencies for our Procurement teams, while still maintaining due diligence standards. We continue to deepen our understanding of modern slavery risks through mechanisms such as human rights-related webinars, attended by members of the Modern Slavery Working Group. These information-sharing forums, featuring subject matter experts and other reporting entities, provide Aurizon with valuable insights into the challenges faced by other organisations, new tools and resources available, and expert perspectives from panellists. These opportunities help us refine our approach to identifying, assessing and addressing modern slavery risks within our operations and supply chain.



### Procurement and supply chain

Each year, we continue to monitor several indicators: completion rates of employee awareness training; adverse media alerts; and outcomes of due diligence activities in line with our Modern Slavery Framework. Similarly, we assess the effectiveness of our actions as part of our annual 'year ahead' plan.

During FY2025, we received supplier feedback about our due diligence requirements, particularly SAQ process. While it is not mandatory for suppliers to provide feedback about these requirements, this feedback loop is invaluable and helps us further assess the effectiveness of our due diligence.

### Training and education

We continue to review the allocation of our Modern Slavery Awareness training. During FY2025, it was expanded to more employees across the enterprise. As an organisation with a national footprint, we use this online training as an effective way to increase awareness among our employees. At the end of FY2025, our completion rate was 97%.

# Our year ahead

In FY2026, our focus, in line with our Roadmap, will be to 'Measure and Sustain'. Aurizon has identified the following priorities:

## **Governance & due diligence**

- Extend internal advocacy
- Refresh three-year Roadmap

## **Our operations**

- Continue training employees on modern slavery policies

## **Our supply chain**

- Refresh supplier due diligence program

This is our sixth Modern Slavery Statement made pursuant to the Act. It constitutes the modern slavery statement of the Aurizon Group for the year ending 30 June 2025 (FY2025).

The statement has been approved by the Aurizon Holdings Board of Directors, as the principal governing body of the parent entity of the Aurizon Group on 17 October 2025.



Andrew Harding

Managing Director &  
Chief Executive Officer

November 2025



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