 SOUTHERN SHORTHAUL RAILROAD	<p>Modern Slavery Statement</p> <p>HOLDCO HOLDINGS PTY LTD</p>	<p>HR POL 004 Version No: 02 Approved By: Brent Nally</p>
Created Date: 26 April 2021	Last Revision Date: 14 June 2022	Printed Date: 10 November 2025

MODERN SLAVERY STATEMENT 2025

1. Introduction

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) for Consolidated Rail Holdings Pty Ltd including all wholly owned subsidiaries¹ (**Holdco**) for the period 1 July 2024 to 30 June 2025 (reporting period).

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

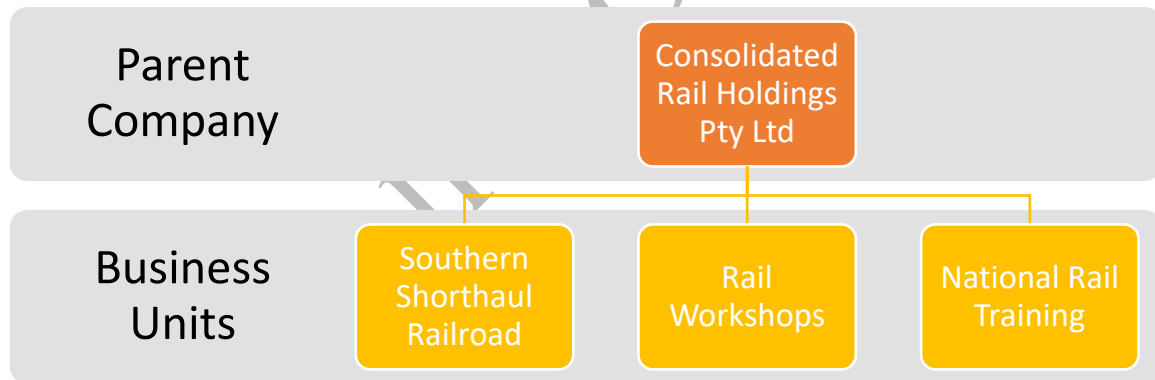
Holdco is committed to operating in accordance with all applicable laws and regulations and with high ethical standards.

2. Our structure, operations and supply chains

The Holdco’s head office is located at 175 Murphy Street, East Bendigo, Victoria, 3550. Holdco is an Australian owned and operated customer-focussed full-service rail business operating throughout Australia. Holdco is an expert rail freight services operator and also has the ability and expertise to provide its customers with flexible and responsive equipment servicing and repair.

The Holdco workforce consists of just under 600 employees based throughout New South Wales and Victoria.

The following is information on Holdco’s business units.




Southern Shorthaul Railroad (SSR)

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

- Grain and energy haulage;
- Intermodal freight;
- Testing and commissioning; and
- Rollingstock transfers.

¹ Including Southern Shorthaul Railroad Pty Ltd, Coalemp No 3 Pty Ltd, Coalemp No 4 Pty Ltd, Bendigo Rail Workshops Pty Ltd, Lithgow Railway Workshops Pty Ltd, and National Rail Training Pty Ltd.

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Rail Workshops (RW)

Based in Bendigo Victoria, and at sites in regional New South Wales, RW provides full maintenance services to both freight and passenger rail customers. The core services offered by RW include:

- Routine servicing, provisioning, and wagon periodic maintenance;
- Repairing locomotive faults;
- Undertaking accident repairs to rollingstock;
- Undertaking core component changeouts on locomotives;
- Upgrade and project specific tasks for passenger rail assets including component change outs and full paint works;
- Full strip down and overhaul;
- Bogie overhauls;
- Painting;
- Field service and provisioning; and
- Emergency recovery.

National Rail Training (NRT)

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

Supply chains

Holdco's main supply chain comprises a mixture of government entities, multi-national or national companies and local supplier partners that provide products or services. The biggest modern slavery risks in its supply chain are in relation to slavery, servitude, forced labour, debt bondage, and deceptive recruitment.


Most regular suppliers are based within Australia. Holdco seeks to support other Australian businesses when it looks for suppliers and will opt for Australian-sourced products before overseas ones.

Core Areas of the Supply Chain		
Southern Shorthaul Railroad	Rail Workshops	National Rail Training
<ul style="list-style-type: none"> • Fuel • Track access • Rollingstock hire • Maintenance of rollingstock including spare parts • Accommodation • Motor vehicles and their management • Information technology • Consumables • Recruitment • PPE/uniform 	<ul style="list-style-type: none"> • Raw materials for manufacture • Components and spare parts • Consumables • Recruitment • PPE/uniform 	<ul style="list-style-type: none"> • Stationery • Information technology • Accommodation

3. Consultation with Holdco entities

Holdco owns the entities in its corporate structure. All business units owned and/or operated by Holdco have common executive management and directorships. This team provides consistent corporate direction, oversight, and risk management across the corporate structure.

Through the ownership structure, and common executive managers and directors, the Holdco business units were engaged in the consultation process for this joint statement, and it has the approval of all business units in the Holdco structure.

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4. Risks of modern slavery practices in Holdco operations and supply chains

The Guidance describes the risks of modern slavery practices as the potential for an entity to *cause, contribute to, or be directly linked to modern slavery through its operations and supply chains*.

In order to manage and minimise the risk of modern slavery, Holdco has policies, procedures and practices in place to ensure that our business remains legally compliant, ethical, and in accordance with human rights standards. Employee entitlements and workplace conditions are governed by awards, enterprise agreements, and/or common law contracts. The few employees engaged on visas are provided with equivalent terms and conditions as local employees, and we provide additional assistance to help them settle in Australia.

Employees are subject to policies and procedures that ensure they are treated, and treat each other, with fairness, respect and dignity, in accordance with applicable laws. Employees are provided with clear instruction and training in this regard as well.

Holdco acknowledges there is potential risk of modern slavery practices in its supply chain. This risk has been assessed to be low due to the high compliance, component quality tracing and regulatory nature of the rail industry. This ensures suppliers are assessed by senior management prior to any engagement.

Holdco understands that the greatest risk of modern slavery arises through its overseas procurement. Holdco sources equipment from a manufacturer in China. Holdco has spent time and resources in this reporting year to build a strong rapport with this manufacturer, part of this has been to ensure the manufacturer understands what modern slavery is, that Holdco abhors slavery, what Holdco's obligations are under the Act, and received a declaration from the manufacturer that includes a commitment to expel modern slavery from its supply chains and ensure that there is compliance with the Act. The supplier has also provided information about its human resources, labour union, and manufacturing practices, which has provided Holdco with comfort that the Act is being complied with.

Holdco partners with an entity in the Philippines with regard to provision of desk-based duties. As above, Holdco has educated this provider about Holdco's modern slavery obligations and has been provided with an assurance that the provider understands modern slavery and has practices and procedures in place to ensure it does not occur in its operations. This entity has used the Australian Government's Modern Slavery Toolkit to conduct an assessment of its operations.

5. Actions taken to assess and address modern slavery risks

This is the fifth reporting period for Holdco. Holdco has focused on improving our understanding of modern slavery risks and how these risks may be present in our supply chains, particularly where we have suppliers overseas. A review of major suppliers has determined any instances of modern slavery practices occurring is low risk, we cross reference our major suppliers against the Modern Slavery Statements Register and considered the statements of our suppliers. We refer to the Walk Free Global Slavery Index to consider and assess the prevalence and risk of modern slavery in overseas countries where we do business and where our partners are located. Holdco has extensive policies, procedures, and practices in place, including continuous improvement and review processes, to ensure that our businesses remain legally compliant and ethical.


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

Holdco's template commercial contracts have modern slavery provisions in them. This is to help reduce the risk of modern slavery in our supply chain and to also help build the awareness of those we partner with about modern slavery and signal we do not want it in our business operations. Likewise, we accept modern slavery provisions in contracts presented to us.

6. Assessing the effectiveness of actions taken

During this reporting period, Holdco's executive management team worked to gain an understanding of the risks of modern slavery arising from our suppliers in China and the Philippines. Prior learning has enabled

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our executive management team to be able to confidently discuss the risks and impacts of modern slavery with our suppliers and identify and respond to any actual or suspected incidences of modern slavery.

7. Focus for the next reporting period

Holdco will focus on the following in the next reporting period:

- Continuing to look at the inclusion of modern slavery provisions in our commercial contracts.
- Continue to ensure that the executive management team, and senior and supervisory roles in our business understand modern slavery requirements.
- Continue to build rapport with our overseas suppliers to raise awareness of modern slavery, and obtain data to aid in identifying modern slavery risks in their operations and supply chains.
- Assess the effectiveness of the actions taken to identify and address modern slavery risks in Holdco's supply chain.

This statement was approved by the Board of Directors.



Brent Nally

Director – Corporate Services