

1. PURPOSE

The purpose of this statement is to set out the reporting entity's obligations, framework, and responsibilities regarding Modern Slavery. The reporting entity is Martinus Group Holdings Pty Ltd (Martinus). This statement is in line with the Modern Slavery Act (2018) and outlines our approach to ensuring that Martinus has a robust framework in place to minimise the risk of modern slavery in our business operations and supply chain.

2. OUR BUSINESS AND SUPPLY CHAIN

Martinus is a privately owned company incorporated under the Corporations Act 2001. Martinus owns and operates Martinus Rail Pty Ltd, Martinus Management Services Pty Limited, Martinus Rail Infrastructure Pty Ltd and Salix Products Pty Ltd. The current business divisions are Business Development, Corporate Services, Engineering, Finance, Growth, Haulage, Health Safety & Environment, Infrapay, Major Projects, Marketing, Plant, Products, Rail Infrastructure Services & Resources.

Martinus' supply chain comprises the provision of goods and services to perform maintenance and construction services to national rail infrastructure. Our procurement activities take place in Australia, New Zealand and Chile. Our major areas of supplier spend are rail infrastructure costs, which includes rail sleepers, turnouts, electrical components, labour and civil construction works.

3. POLICY COMMITMENT

We recognise that slavery and human trafficking can occur in many forms, as considered in the Act. This includes slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labor or services. We are an organisation that is committed to operating with diligence, responsibility, and with a sharp focus on maintaining high ethical standards. We will not tolerate any forms of slavery or human trafficking in our business. Our internal policies and procedures ensure that we are committed to operating consistently with our ethical standards, and that our values are enshrined across our business.

4. MODERN SLAVERY RISK MANAGEMENT

The Martinus risk management process is underpinned by the Modern Slavery Procedure. This procedure involves identifying, analysing, evaluating, ranking, managing, monitoring, and reviewing risk. We capture the risks of modern slavery practices within this procedure including the risks that present to our international supply chain. To date, there have been no instances of modern slavery in our operations or supply chain. Our supplier evaluation assessment and selection process allows us to mitigate our supply chain risk. And, our business model involves a large degree of self-performing work, which allows us to have a high degree of visibility of our labour conditions.

5. ACTIONS

We are committed to operating our business lawfully and ethically. We choose to only working with suppliers that are aligned with our values. We expect our suppliers to operate in accordance with our standards, and with compliance to all applicable modern slavery laws outlined in the act. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, staff inclusion and diversity.

In the coming years, steps we are undertaking to further address modern slavery risk in our operations and supply chain include:

1. Assessing the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions;
2. Consult across our entities in line with our Modern Slavery Procedure across our operations and supply chains;
3. Ongoing training for staff in modern slavery requirements;
4. Preparing to conduct due diligence on local and global supply chains;
5. Reviewing supplier contracts and enterprise agreements to ensure they contain terms that are consistent with the Act;
6. Taking steps to address any potential modern slavery risks identified, including requesting the remediation measures and corrective actions implemented by the supplier and the expected timeframes for remediation; and
7. Setting up a program to measure effectiveness through performance monitoring.

6. PERFORMANCE INDICATORS

We determine the effectiveness of our management of modern slavery and and/or human trafficking risk by:

- Reviewing the number of reports received by our organization from employees, the public, our suppliers, or law enforcement agencies raised about modern slavery practices that may have been identified.
- Reviewing our timeliness, and compliance with our internal policies and procedures for all instances where modern slavery practices may have been raised
- Requesting feedback on our information and training sessions regarding modern slavery.

7. APPROVAL

This statement has been authorised and approved by the sole governing body of Martinus Rail, Treaven Martinus (Chief Executive Officer) on 28 June 2024.

Authorised by :

Treaven Martinus

Chief Executive Officer



DATE: 28/06/2024