

1. PURPOSE

The purpose of this statement is to set out Martinus' position on Modern Slavery and our actions and responsibilities in relation to such matters. This is our first statement under the Modern Slavery Act (2018) and covers the Financial Year 2019/2020. This statement outlines our approach to ensuring that Martinus has robust frameworks and processes 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. The current business divisions are Finance, People and Culture, Products, Recruitment, Commercial, Legal, Rail Services Team, Growth Team, Plant, Marketing and Construction teams.

Martinus' supply chain comprises the provision of goods and services to allow 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. Our major areas of supplier spend are rail infrastructure costs, including 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 fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our business. We will not tolerate any forms of slavery or human trafficking in our business. Martinus has a longstanding commitment to conducting business in a responsible manner and in accordance with our code of conduct. We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

4. MODERN SLAVERY RISK MANAGEMENT

Martinus risk management process involves identifying, analysing, evaluating, ranking, managing, monitor and reviewing the risk. To date, we have not become aware of any instances of modern slavery in our operations or supply chain. Our business model involves a large degree of self-performing work, meaning we have a large degree of visibility of labour conditions compared to some other business models in our industry. We mitigate supply chain risk through our supplier evaluation assessment and selection process.

5. ACTIONS

We are committed to operating our business lawfully and ethically and in only working with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking, and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and 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. Developing and reviewing company policies on modern slavery in operations and supply chains;
3. Developing training for staff in modern slavery requirements;
4. Preparing to conduct due diligence on local and global supply chains;
5. Reviewing supplier contracts 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

The effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking risk is addressed within our business if:

- No reports are received from employees, the public, our suppliers, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Internal auditing will not show any breaches of increased risks of modern slavery occurring within our business operations.

7. APPROVAL

This statement has been authorised and approved by the sole governing body of Martinus Rail, Treaven Martinus on 1st March 2021.

Authorised by: 
Treaven Martinus
Managing Director

Dated: 01/03/2021