



Modern Slavery Statement

Issue: 2	Effective: 19/9/2024	Reviewed: 19/9/2024	Owner: Compliance
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1. PURPOSE

L.C. Dyson's Bus Services Pty Ltd (Dysons) has a zero-tolerance approach to all forms of modern slavery practices and is committed to implementing and enforcing effective systems and controls to ensure modern slavery practices are not taking place in our own operations or in any of our supply chains.

This modern slavery statement (Statement) sets out the steps Dysons has taken to prevent modern slavery in its business and supply chains for the financial year 1 July 2023 to 30 June 2024.

This Statement has been prepared in line with the requirements of the Modern Slavery Act 2018 (Cth) ("the Act") and for the purposes of this Statement, "modern slavery" has the meaning given in section 4 of the Act.

2. REPORTING ENTITIES

The entities covered by this Statement are:

- L.C. Dyson's Bus Services Pty Ltd
- Northern Bus Lines Pty Ltd
- Mylon Motorways Pty Ltd
- Reservoir Bus Company (Vic) Pty Ltd
- Midland Tours (Vic) Pty Ltd
- East West Bus Company (Vic) Pty Ltd
- GS & AE Ridgeway Pty Ltd

Dysons acknowledges it has both a legal and a moral responsibility to promote transparency in our operations. Therefore, we implement procedures specifically focused on reducing the possibility of modern slavery practices existing within our business and our supply chain.

3. STRUCTURE, OPERATIONS AND SUPPLY CHAINS

3.1 Structure

Dysons is a wholly Australian family-owned company who are supported by a leadership team that oversees operations, people, finance, fleet services and infrastructure, compliance and administration for all entities within Dysons.

3.2 Operations

The core business of Dysons is to provide and operate bus passenger transportation services on behalf of the Victorian and New South Wales governments.

Dysons now operates a fleet of approximately 800 vehicles and employ more than 1,300 employees. The main components of our staff are bus drivers, maintenance staff and administrative support.

3.3 Supply Chain

Dysons only provide services within Australia. As such, all our employees are based in Australia.

Our supply chain is diverse in terms of the types of products and services that we procure and the size of the supplier entities (being large operators to small and medium local suppliers). Most of these supplier relationships are long term and well established. Dysons are required by its contracts with various government organisations to prioritise local suppliers wherever possible, so our suppliers are primarily located in Australia.

Dysons supply chain is constituted by:

a) direct suppliers of the following general categories of products and services:

- goods and services – for example, fuel, oils, lubricants, spare parts, tyres, uniforms, cleaning services, utilities (including telecommunications services) and information technology systems and services,
- maintenance services – for example, chassis/body repairs, windscreen repairs, general tradesperson works,
- capital purchases – for example, purchase of assets (such as buses and other vehicles), construction and property,
- professional services – for example, advisory services for financial, legal and other technical matters in support of projects such as acquisitions and/or tender responses, and audit services,

for which Dysons a direct contractual relationship (whether formal or informal);

b) indirect suppliers such as:

- suppliers of Dysons direct suppliers throughout the supply chain including suppliers of raw materials used in the production of goods procured by Dysons,
- subcontractors of Dysons direct supplier

4. RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS

4.1 Operational Risk

Dysons only operate in Australia and all our employees are in Australia. Given the controls and societal expectations with respect to employment conditions in Australia, the risk of Dysons causing, contributing to, or being directly linked to modern slavery practices in respect of its operations is minimal.

We have strong visibility over our employees, and we comply with all Australian workplace laws, including the Fair Work Act 2009 (Cth), National Employment Standards (NES), and work health and safety legislation. We are confident there are no modern slavery practices within operations directly under our control.

In accordance with various legislation and enterprise agreements currently in place, Dysons regularly engage with the Australian Manufacturing Workers Union (AMWU), and the Transport Workers Union (TWU) who act in their capacity to represent the interests of their members.

Furthermore, Dysons seek external legal advice from specialist employment lawyers and service providers to ensure we meet various legal and social obligations, and our employees receive the correct entitlements. We are confident that we are not directly causing or contributing to modern slavery practices in our workforce.

Dysons note in particular:

- Our recruitment process verifies prospective employees' age (ensuring they meet the minimum age to be eligible for employment) and are eligible to work in Australia

- Our induction training for new employees clearly outlines expected workplace behaviour including mandatory work health and safety training
- Our contractual and legislative obligations in respect of work health and safety ensure we are held to a very high standard when it comes to protecting its workers health and safety

4.2 Supply chain risks

Dysons recognise that even though most of our suppliers are based in Australia, some of their products and services may be, partly or wholly, manufactured in other countries in the Asian, North American, and European regions.

Our supply chain has multiple tiers and we acknowledge that there are certain industries, products, services and geographic regions which carry a higher risk of modern slavery. While we can coordinate due diligence of our direct suppliers, we have less visibility and influence over the operations and business practices of the suppliers of our suppliers.

Based on the Commonwealth Modern Slavery Act 2018 guidance, Dysons have concluded that the supply of the following general categories of goods and services have inherent risks of involving modern slavery practices along the supply chain.

Risk Sector	Risk Profile
Uniforms and personal protective equipment	The apparel industry is associated with vulnerable populations in higher risk geographies. Often these industries employ low-skilled workers and offer poor labour conditions. Slavery practices are often present in the production side of operation. In high-risk countries or regions, human rights have been poorly protected, and laws are inadequately enforced. For instance, forced labour is an issue in many high-risk countries and regions where individuals are held in debt bondage. Further, the potential for child labour exists in areas of high poverty.
Cleaning services	These industries tend to employ unskilled and often vulnerable workers such as migrants, backpackers or refugees who may not be aware of their rights under Australian law. The work often occurs outside regular business hours or workers do not receive the legal award rate of pay, superannuation or leave entitlements. They may also be more susceptible to work-related injuries due to poor working conditions that are not adequately regulated by occupational health and safety standards.
Information technology equipment	There is a risk the original source material used in manufacture of information technology equipment is linked to modern slavery practices.
Catering Services	These industries tend to employ unskilled and often vulnerable workers such as migrants, backpackers or refugees who may not be aware of their rights under Australian law. The work often occurs outside regular business hours or workers do not receive the legal award rate of pay, superannuation or leave entitlements. They may also be more susceptible to work-related injuries due to poor working conditions that are not adequately regulated by occupational health and safety standards.
Fuel and lubricants	There is a risk raw material extraction could be associated with vulnerable populations in higher risk

	geographies and that the vessels used to transport fuel could expose crew to forced labour and/or unacceptable working conditions.
Spare parts such as tyres	There is a risk that the sourcing of raw materials used to manufacture some types of tyres, natural rubber, is associated with modern slavery practices as the process is labour intensive and is associated with vulnerable populations in higher risk geographies.

5. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISK

During the last twelve months Dysons have made efforts to contact our high-risk suppliers to ascertain their approach to modern slavery risks. It is important to note that 85% of Dysons currently active suppliers are small and medium enterprises (SME) who are not required to lodge a Modern Slavery Statement. We have found the approach and understanding of these SMEs is immature and will require dedicated effort and engagement to get them to gain a full understanding of the risks associated with Modern Slavery.

Dysons aim to manage modern slavery risks across our operations and supply chains by continually improving our ability to identify, assess and address modern slavery risks on a company wide basis.

We have carried out both internal and external audits, reviewed internal complaints raised, and actively sought feedback through employee surveys. We also assessed the actions we take to reduce modern slavery in our supply chains. Employee surveys helped Dysons to gauge employee satisfaction and provided a platform for employees to provide anonymous feedback in relation to working conditions. No concerns were raised in relation to modern slavery. Likewise, no internal complaints were raised in relation to modern slavery risks.

Audits are conducted by Compliance as part of general assurance activities driven by Dysons risk assessments and the various standards Dysons complies with across information security, quality, health and safety and environment. Internal and external compliance audits were conducted for ISO 9001, 14001, and 45001 compliance which includes review of supplier management. External audits were also conducted for the purposes of statutory financial reporting as well as part of certification against standard

During the reporting period we achieved the following:

- The implementation of our Modern Slavery and Whistle Blower Policy.
- The prevention of modern slavery principles was incorporated into our procurement related policies and procedures.
- We commenced a focus on raising awareness of the forms of modern slavery among our employees and supply chain.
- A supplier Code of Conduct was implemented to ensure our suppliers meet and exceed minimum expectations as outlined in the Code and continuously strives to improve the standard of their business practices. Suppliers are expected to comply with all anti bribery, anti-corruption, anti-money laundering, and modern slavery laws.

6. CONSULTATION

Each entity owned or controlled by Dysons as outlined in section 2.0 of this statement is governed by the same management team and board of directors. There is shared governance of policies and procedures in respect of identifying and assessing modern slavery risk for all entities.

As such, the development of this statement was made in collaboration and consultation with the Executive Leadership Team who have oversight of all reporting entities operations and activities.

The Dyson Executive Team include personnel from key business areas such as Operations, Fleet, Finance, Procurement, Human Resources, Safety and Compliance.

7. FUTURE COMMITMENTS

Dysons are committed to continue working on its systems and controls to assess and manage modern slavery risks in our operations and supply chain.

We are focussed on embedding and building the maturity of our modern slavery program in 2024-2025 and beyond through the following actions:

- Continual due diligence on Dysons supply chain to understand the risk level of exposure to modern slavery practices;
- Continually review and improve activities to ensure Dysons is taking all necessary steps to combat modern slavery across the business;
- Develop and release education and awareness training to all employees to help them understand and recognise modern slavery practices;
- Promote policies and Dysons commitments to suppliers, vendors and contractors.

8. APPROVAL

This Statement was approved by the Dysons Board of Directors on the 19 September 2024 and is signed by Andrew Jakab as the Managing Director & CEO for all entities covered in this statement.



Andrew Jakab

Managing Director & Chief Executive Officer