



Modern Slavery Statement

Issue: 1	Effective: 1/7/2023	Reviewed: 1/7/2023	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 2022 to 30 June 2023.

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:

- 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) 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 guidance from the Australian Department of Home Affairs and the Global Slavery Index 2018, 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
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.
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

Dysons acknowledges that this is our first year of reporting and we are in the early stages of identifying and mitigating risks of modern slavery within our operations and supply chain. It will be an ongoing and collaborative process that will take a continuous improvement approach to building a risk mitigation framework. We look forward to collaborating with more people and entities within our sphere of influence so that we may eliminate any exposure to modern slavery practices within our business and the communities where we work.

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.

During the reporting period we commenced the assessment of the risk of modern slavery in our business including:

- Reviewing and updating (where necessary) existing policies including finalising and implementing a Modern Slavery and Whistleblower Policy.

- Incorporating prevention of modern slavery principles into our procurement related policies and procedures.
- We will focus on raising awareness of the forms of modern slavery among our employees and supply chain.

6. CONSULTATION

All the entities in Dysons are family owned.

This Statement has been reviewed and approved by the directors of Dysons. The development of this Statement was done and reviewed by an executive/senior management group comprising representatives of Dysons.

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 2023- 2024 and beyond through the following actions:

- Finalising our Modern Slavery and Whistleblower Policies
- Raise awareness of modern slavery and understand its present impacts on our society by developing educational materials and training sessions for internal key stakeholders. These training documents will outline and summarise information that will equip key staff to:
 - Recognise common forms of exploitation identified in the Modern Slavery Act 2018
 - Understand the facts and impacts of modern slavery
 - Identify signs of modern slavery, both in our operations and our supply chain
 - Understand what actions to take if confronted by suspected modern slavery
 - Identify our high-level requirements and obligations pertaining to the Modern Slavery Act 2018
- Undertake a supply chain mapping exercise in accordance with guidance published by the Australian Department of Home Affairs and, following this, assessing modern slavery risk as described in section 3.4.2 of this statement including requesting certain additional suppliers complete a due diligence questionnaire to provide information about the suppliers' policies and practices if required.
- Continue to Incorporate prevention of modern slavery principles into our procurement related policies and procedures.

8. APPROVAL

This Statement was approved by



Andrew Jakab
Managing Director & Chief Executive Officer