

Modern Slavery Statement





Acknowledgement of Country

DT Infrastructure Pty Ltd acknowledges the Traditional Custodians of the lands where we operate and pays our respects to their Elders, past and present.



Contents

Introduction	2
About this statement.....	3
Process for consultation.....	4
A message from our CEO	6
Organisational structure	8
Operations and supply chain.....	10
Potential risks in our operations and supply chains	13
Addressing the risk of modern slavery practices	16
Assessing the effectiveness of our actions.....	18
Consultation process	19
FY25 commitments.....	20
Approval	20

Introduction

DT Infrastructure Pty Ltd (ABN 39 665 782 730) (**DTI**) upholds high standards of conduct and welcomes feedback from affected parties to improve our due diligence practices in our operations and supply chains. If you have concerns about modern slavery, potential human rights issues, or unethical behaviour in DTI's operations or supply chain, we strongly encourage you to contact us. Your input is valued, and your right to anonymity will be upheld. Any person may make a disclosure on any Improper Conduct that concerns DTI using the Speak Up link to lodge their concerns with our third-party provider. More details on our Speak Up policy are located [here](#).



About this statement

DTI is a key contractor in the Australian infrastructure sector, specialising in the design, construction, and maintenance of complex transport projects. Our expertise spans rail infrastructure, rail maintenance, rail safety technology, roads, bridges, and station construction, providing multi-disciplinary solutions to improve connectivity across urban and regional areas.

This Modern Slavery Statement (**Statement**) outlines DTI's approach to managing modern slavery risks in our operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**the Act**), for the period 1 July 2023 to 30 June 2024.

This Statement does not apply to DTI's non-controlled joint ventures, nor does it apply to entities in which DTI has an interest but is not required to report under the Act.

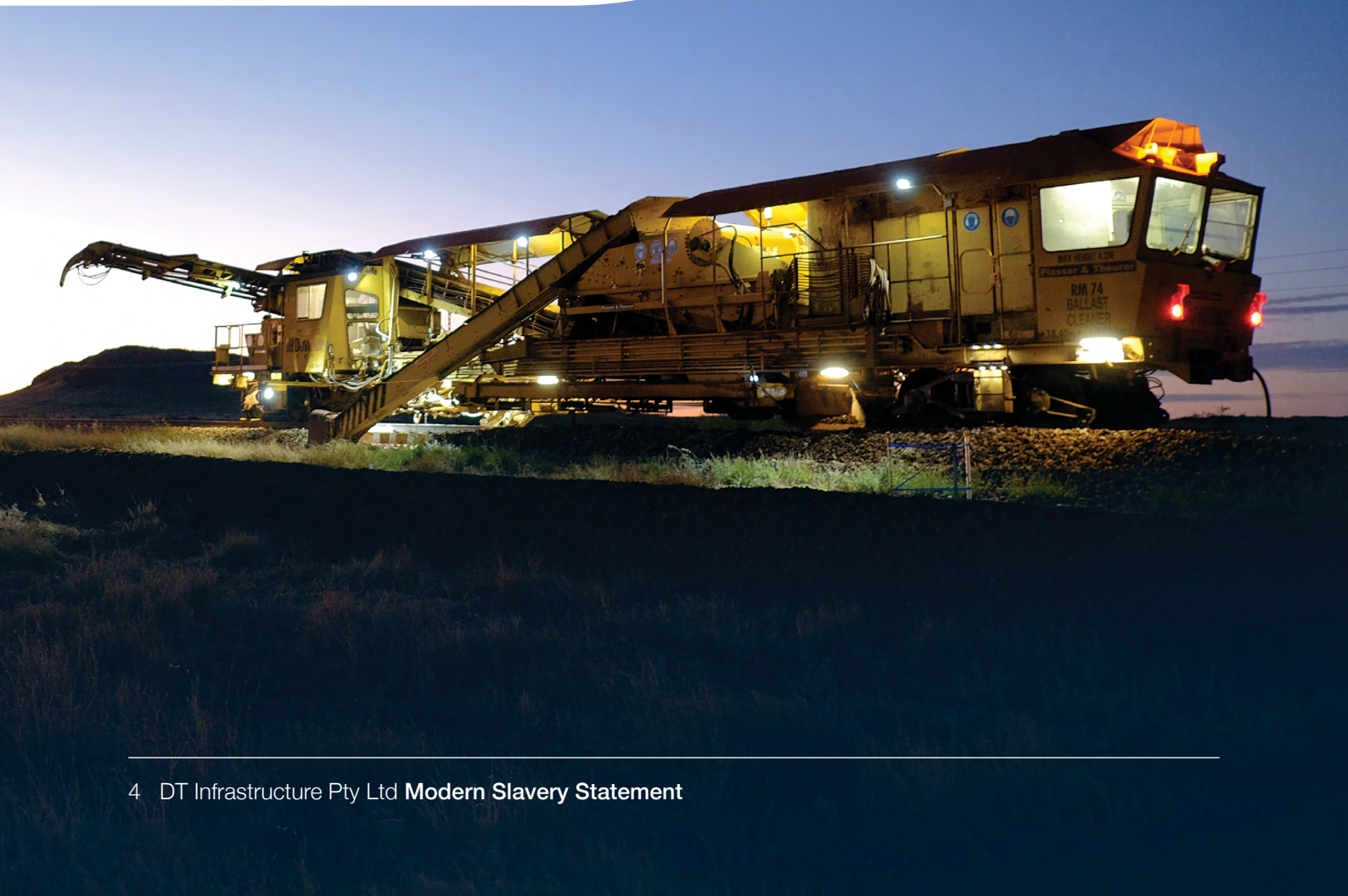
Process for consultation

In preparing this Statement, members of DTI's Senior Leadership Team and stakeholders from within our relevant business units have been actively engaged and consulted. This Statement has been approved by the board of directors of DTI (**the board**).

In the preparation of this Statement, the following has been undertaken:

- (i) collaboration with DTI's Senior Leadership Team, key business units, other internal stakeholders and the board, to provide an overview of the Act's reporting requirements;
- (ii) collation and provision of information in relation to the actions DTI has taken, and intends to take to meet these requirements, including relevant updates to internal policies, procedures and the way we do things; and
- (iii) consolidation of feedback from the above parties in relation to our modern slavery practices, procedures and policies, and modern slavery matters more generally.

This Statement is the consolidated output from those efforts.



DTI's highlights for FY24



Launch of the First Modern Slavery Statement:

DTI's first Modern Slavery Statement marks a significant milestone in our journey to address modern slavery risks in our operations and supply chain.



Enhanced Policies and Governance:

- Implementation of the Modern Slavery Policy and Supplier Code of Conduct, which establish clear expectations for ethical practices and compliance across DTI's supply chain.
- Strengthening of the Procurement Framework with a 100% digital pre-qualification process for suppliers and subcontractors.



Training and Awareness:

Delivery of targeted modern slavery training, including 75 staff completing the Procurement Fundamentals module with a focus on modern slavery awareness and DTI policies.



Transparency and Reporting Mechanisms:

- Introduction of the "Speak Up" policy for stakeholders to confidentially report concerns related to modern slavery.
- Ongoing commitment to reviewing and updating internal policies based on feedback and industry developments.



Strategic Risk Assessment:

Use of tools like the Global Slavery Index and KPMG reports to identify risks in operations and supply chains, ensuring prioritised action on identified vulnerabilities.

A message from our CEO

At DTI as we continue to grow and deliver complex infrastructure projects across Australia, we recognise the critical importance of embedding practices that respect human rights and prevent modern slavery within our operations and supply chains.

This is not just a legal obligation; it is a moral imperative. We believe that every person involved in our operations and supply chains deserves to be treated with dignity and respect. We are dedicated to ensuring that our actions and our processes reflect these values.

The release of our first Modern Slavery Statement as DTI marks an important step in our journey to address and combat modern slavery. We know that slavery and human trafficking take many forms – from forced labour to child exploitation, and we are committed to taking meaningful actions to prevent these practices from taking root in our operations. Our commitment extends beyond compliance—it is embedded in DTI's core values, which guide how we work, operate and interact with all our stakeholders on a daily basis.

Looking ahead, we are aware that as the nature of our work expands and shifts, particularly as we move into renewable energy projects like wind and solar farms and Battery Energy Storage Systems (BESS), new complexities and challenges in our supply chains are inevitable. These projects, while critical to a sustainable future, come with risks, particularly the procurement of raw materials and the use of subcontracted labour. We are up to managing these challenges. We conduct thorough due diligence on our supply partners, including factory audits, supplier capacity-building programs, and collaborative risk mitigation strategies, to ensure our partners meet ethical standards and continuously improve their practices.



Ultimately, our commitment to addressing modern slavery aligns with our broader vision of delivering reliable, safe, and sustainable solutions that benefit the communities in which we operate. We will continue to lead by example, striving for continuous improvement and upholding our responsibilities as a trusted infrastructure partner. Together with our suppliers, subcontractors, and stakeholders, we can make a tangible difference in addressing modern slavery.

As DTI's Chief Executive Officer, I am proud of the steps we have taken so far, but I am even more committed to the journey that lies ahead. Our collective efforts will help ensure that we remain a company that prioritises the well-being, dignity, and human rights of all those who contribute to our success.

A stylized, handwritten signature in dark ink, consisting of several fluid, overlapping strokes.

John Anderson
Chief Executive Officer
DT Infrastructure Pty Ltd

At DTI, we live by the core values of:



Take personal ownership

Every individual at DTI is responsible for upholding ethical standards. We empower our people to take initiative in recognising and reporting any concerns related to modern slavery, ensuring empowerment and accountability is felt at all levels of our business.



Walk the talk

We don't just speak about ethics and human rights; we put these principles into action across our operations; from each and every project we deliver and across every relationship we build within our supply chain.



Adopt open, honest communication

We consider transparency is a key component of preventing modern slavery. We encourage open dialogue with and between our employees, suppliers, clients and other stakeholders to ensure we are all aligned in our efforts to promote ethical practices.



Demonstrate real teamwork

Tackling modern slavery requires collaboration. Whether it's within our teams or in partnership with our suppliers, we believe that working together is a non-negotiable to address complex human rights issues meaningfully and effectively.



Develop our people

We are dedicated to fostering a culture of continuous improvement within our business and on our projects. Through ongoing training and development on best practice procurement methods, and educating our people on modern slavery matters, we ensure that everyone at DTI is equipped with the knowledge and tools to identify, prevent, and address modern slavery risks.

Organisational structure

DTI commenced operations in June 2023, marking a significant transition from our roots as the Downer Group's Infrastructure Projects division. For nearly a decade, this division played a crucial role in delivering multi-disciplinary solutions across Australia's transport, rail, and civil infrastructure sectors. With a strong reputation for designing and constructing major infrastructure projects, including light rail, heavy rail, roads, and bridges, our team's expertise is well-known across the industry.

In June 2023, the leadership of the Infrastructure Projects division and our 1,100-strong workforce transitioned to DTI, a fully owned subsidiary of **Gamuda Berhad**, a global leader in engineering, infrastructure, and property development based in Malaysia. This transition represents a new chapter for our company, strengthening our capabilities and allowing us to leverage Gamuda Berhad's vast experience and resources across the Asia-Pacific region.

DTI's parent company, Gamuda Berhad, was established in 1976, operates in nine countries and is recognised worldwide for delivering innovative, sustainable solutions across a wide range of infrastructure projects. Operating under Gamuda Berhad's ownership has enabled DTI to maintain our local expertise while benefitting from Gamuda Berhad's global reach and technical knowledge. This structure also opens new opportunities for DTI, particularly in renewable energy projects, where Gamuda Berhad has extensive experience.

DTI now operates as a key player within Gamuda Berhad's Australian portfolio, alongside our sister company Gamuda Engineering. Together, we are well-positioned to deliver on our vision of providing reliable, safe, and sustainable infrastructure solutions that benefit the communities in which we work.

Both our leadership team and our employees remain committed to upholding the values and standards that have defined our success to date, while embracing the innovative practices and global expertise that Gamuda Berhad brings to the table.



Gamuda Berhad

Malaysia

Australia

**Gamuda (Australia)
Branch**

ARBN 632 738 768

**Gamuda Holding
Pty Ltd**

ACN 665 763 020

**Gamuda (Australia)
Pty Ltd**

ACN 602 514 456

**Gamuda
Engineering Pty Ltd**
ACN 636 433 522

**DT Infrastructure
Pty Ltd**
ACN 665 782 730

**Gamuda
(Melbourne) Pty Ltd**
ACN 660 668 799

**Gamuda
GEO Pty Ltd**
ACN 662 462 277

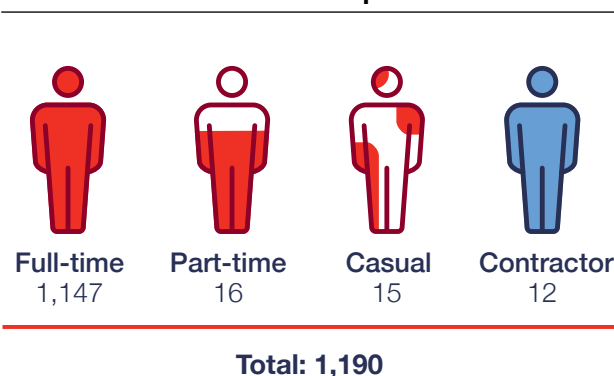
**Tunnelling
Solutions Pty Ltd**
ACN 169 917 551

**DTI Projects
Pty Ltd**
ACN 679 588 571

Operations and supply chain

DTI's operations are focused primarily on the Australian market, where we deliver large-scale infrastructure projects across transport, rail, road, and renewable energy sectors. With a strong workforce of over 1,100 employees, we specialise in complex, multi-disciplinary solutions that include the design, construction, and maintenance of critical infrastructure. Our projects span both urban and regional areas, reinforcing our commitment to improving connectivity and sustainability for communities across Australia in which we work.

Table 1: DTI Workforce Composition¹



Full-time employee: Employed directly by DTI in an ongoing manner on a full-time basis (38 hour per week contract).

Part-time employee: Employed directly by DTI on contractual terms for a portion of time per week that is less than the full time 38 hour per week load.

Casual: Employed directly by DTI, on a day-to-day basis, with casual loading and terms and conditions aligned to casual employment.

Contractor: Not employed directly by DTI, but engaged on an alternative contracting arrangement for a fixed period on alternative commercial terms and conditions to the direct employment contract.

Supply chain overview

DTI's supply chain is predominantly domestic, allowing us to closely manage our procurement activities and maintain strong, transparent relationships with our suppliers. In the 2023-2024 reporting period, our direct overseas procurement was minimal, being from 10 vendors and totalling only 0.3% of our total supply chain spend. This low proportion of international spend is largely attributed to many of our projects being in the later phases of their procurement life cycle, where the majority of the required materials and services have already been sourced locally, and there is a reduced need for large-scale procurement, particularly from international suppliers.

As new projects come onboard, the procurement of specialised materials and/or equipment will grow, potentially involving more international sourcing. This expansion could heighten the risk of modern slavery in our supply chains, as the complexity and geographical diversity of sourcing can make it more challenging to ensure ethical labour practices.

It is also important to note that this Statement does not apply to any non-DTI controlled joint venture (**JV**) projects. A number of DTI's large current infrastructure projects are being delivered through joint venture arrangements with third party entities. The procurement practices on these projects are managed separately by DTI's respective JV partners. Accordingly, in order to remain an accurate reflection of DTI's practices, this Statement focuses solely on DTI's controlled procurement.

The overseas procurement sourced by DTI in this Statement's year was predominantly IT software licenses. Software licencing is an area that is generally considered lower risk in comparison to DTI's other procurement industries, such as raw material sourcing or heavy manufacturing, because it primarily involves intellectual work performed in countries with strong labour protections, unlike raw material sourcing or manufacturing, which often rely on manual labour in high-risk regions.

¹ At date of submission

Typically, the software industry has fewer physical supply chain inputs and is less labour-intensive, reducing exposure to exploitative practices. Nevertheless, we understand that even indirect exposure through software providers or third-party suppliers can carry risks, and as such, we apply the same due diligence to these supply chain partners as we do our partners from other procurement industries. Our Supplier Code of Conduct and our Modern Slavery Policy apply to domestic and international suppliers, ensuring compliance with ethical standards regardless of location.

In FY2024, DTI worked with a total of 1297 direct domestic and 10 international suppliers, with key areas of spend including:

(A) materials such as concrete, steel, piping and asphalt;

- (B) industrial/engineering consumables such as fuel and lubricants;
- (C) subcontractors such as civil, earthworks, electricians, plumbers, and other tradespeople;
- (D) rail componentry;
- (E) plant and equipment;
- (F) personal protective equipment (PPE);
- (G) labour hire;
- (H) professional services; and
- (I) technology and telecommunications.

Supply chain spend

International	\$	1,323,981.34
Total	\$	419,021,180.84

Category	AE	DE	GB	SG	US
Business and strategy				\$ 499,907	
Machinery and equipment		\$ 18,766	\$ 35,694		
Software licences	\$ 486,829				\$ 202,793
Technology			\$ 50,393		
Training		\$ 29,600			
Total	\$ 486,829	\$ 48,366	\$ 86,087	\$ 499,907	\$ 202,793

Future supply chain considerations

Looking ahead, we anticipate increased engagement with international suppliers as we expand into renewable energy projects such as wind farms, solar farms and BESS. These projects often require specialised components sourced from regions with historically higher modern slavery risks.

To mitigate these risks, DTI will further enhance our current supplier vetting processes, increase the frequency of our supplier audits, and conduct additional, on-site audits where necessary. Our focus will be on ensuring that all our international suppliers meet the same ethical standards that we demand of our domestic partners.

In addition to the above, we are committed to strengthening our relationships with our local suppliers and subcontractors to support our sustainability goals and reduce our reliance on overseas procurement where possible. This will not only mitigate modern slavery risks associated with offshore procurement, but will also support local businesses and communities, aligning with our broader commitment to responsible, ethical operations.



Potential risks in our operations and supply chains

At DTI, we recognise that our move into renewable energy projects introduces new risks, particularly in the reliance on international procurement of specialised materials and equipment they require. While the majority of our supply chain remains domestic, our increasing reliance on global suppliers for certain products exposes us to heightened modern slavery risks.

Operational risks

In assessing and considering potential modern slavery risks within our operations and supply chains, we leveraged insights from recognised external sources including the ['Global Slavery Index'](#) and [KPMG's 'Property, Construction & Modern Slavery' report](#). These studies provide invaluable information on known risk factors in the infrastructure and renewable energy sectors and their management. Our procurement expertise, further informed by these sources, allows us to evaluate risk levels across our supply chain and prioritise our efforts and manage those risks accordingly.

While we have primarily relied on desktop reviews to inform our risk identification process, moving forward, this approach will be complemented with a more formal approach as our operations expand.

Moving forward, we are committed to enhancing our risk assessment practices through direct supplier engagement, targeted audits, and additional due diligence measures, adopting the principles outlined in the United Nations Guiding Principles on Business and Human Rights to proactively identify and mitigate our modern slavery risks. By examining these risks we will gain a comprehensive understanding of our exposure to these issues. This approach will empower us to effectively address the diverse facets of human rights risks and develop targeted strategies for mitigation.

When conducting modern slavery risk assessments we review:

- **Sector and industry risk:** Some industries, like agriculture, construction, and textiles, are more prone to modern slavery due to their reliance on low-skilled labour or complex supply chains. We assess these risks by examining the sector's characteristics and regulatory environment.
- **Geographic risk:** Regions with weak labour laws, poor enforcement, or economic instability pose higher risks of modern slavery. We use global indices and human rights data to evaluate risks in countries where we or our suppliers operate.
- **Supplier risk:** Supplier risk depends on the transparency and ethical practices of the entities we engage with. We assess their location, industry, and commitment to combating modern slavery.

The United Nations' 'Guiding Principles on Business and Human Rights' (UNGPs) sets out a three-part continuum of involvement that outlines how businesses can be involved in adverse human rights impacts, including modern slavery.

CAUSE: A business may cause modern slavery (or other human rights harm) where its actions or operations directly result in modern slavery practices.

CONTRIBUTE: A business may contribute where its actions or omissions facilitate or incentivise modern slavery.

DIRECTLY LINKED: A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chain.

Sector and industry risks

International procurement of materials including photovoltaic panels, steel, cable and other specialised equipment often involves complex and challenging supply chains. These items are frequently manufactured in regions with higher modern slavery risks, particularly in countries where forced labour, child labour, and human trafficking are prevalent. Additionally, the production of raw materials, such as metals used in renewable energy technologies, can involve forced labour in mining and processing stages, which we could be linked through our extended supply chain.

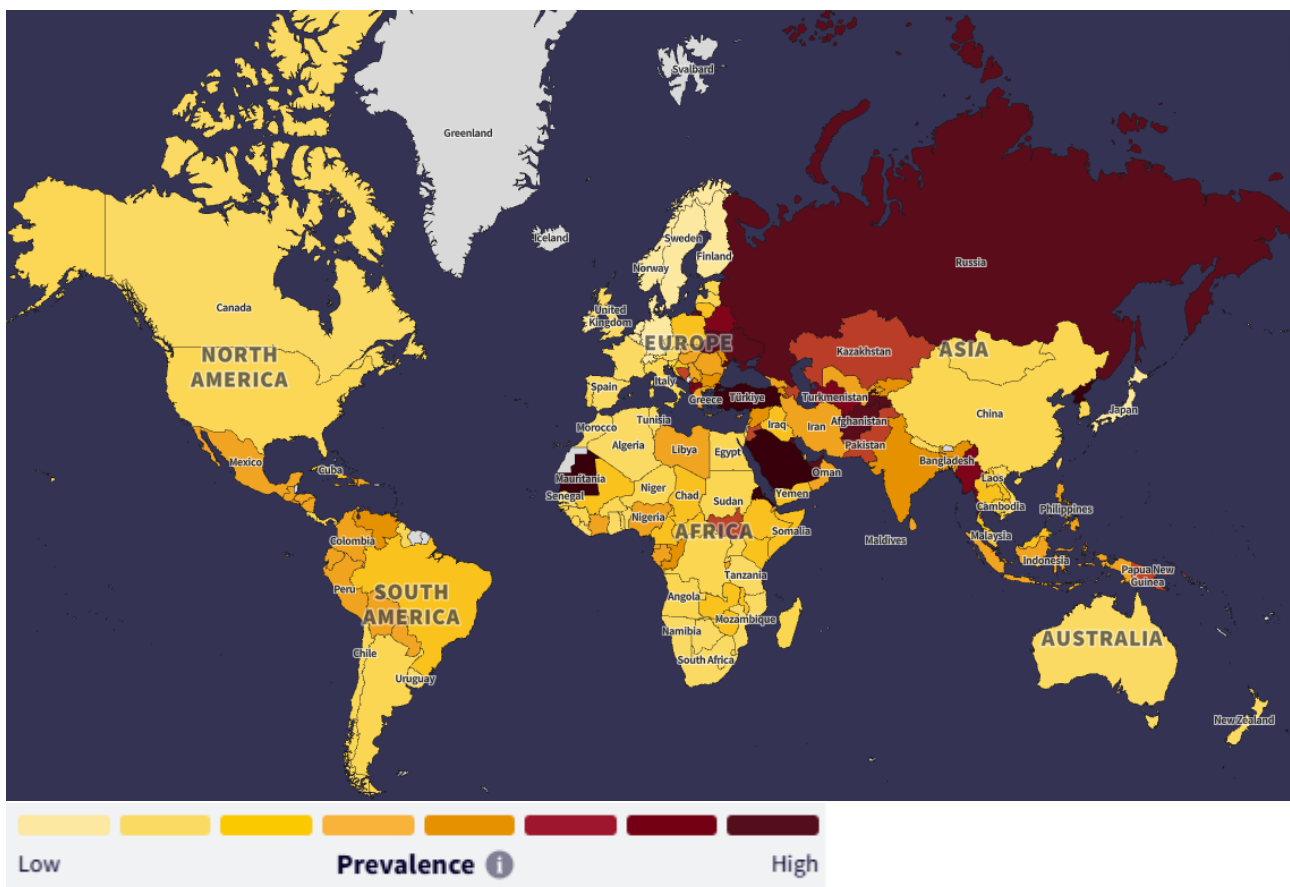
Geographical risks

Regions with weaker labour protections and regulatory oversight pose additional modern slavery risks when in procurement. Countries in Asia, Africa, and some parts of Latin America are known for modern slavery risks in manufacturing and resource extraction industries. As we expand our operations, we may engage with suppliers from these regions,

increasing the importance of thorough due diligence and auditing of our supply chains which we are committed to.

The complexity of global supply chains, particularly in manufacturing, often makes it difficult to trace the origins of materials and ensure compliance with ethical standards. This lack of visibility presents a challenge in identifying and mitigating modern slavery risks, especially beyond the first tier of suppliers. To address these challenges, we will be enhancing our due diligence processes, audits and direct engagement with suppliers in high-risk regions to ensure we engage with suppliers that are committed to ethical labour practices and are implementing traceability initiatives to improve visibility beyond the first tier of our supply chain.

Overall, the assessed level of risk of modern slavery within our direct supply chain was low to medium during FY24, due to the types of goods and services that were procured, combined with the geography of where they were procured from.



Source: Walkfree.org (<https://www.walkfree.org/global-slavery-index/map/>)

Workforce vulnerabilities in international supply chains

In many regions where our suppliers operate, vulnerable worker populations, including migrant workers, low-skilled labourers, and those in precarious employment are at heightened risk of exploitation. These workers can be subject to unsafe working conditions, excessive hours, and underpayment, particularly in industries such as electronics and component manufacturing, which are relevant to our projects and wider operations.

Procuring materials and imported goods from overseas often involves complex supply chains and multiple layers across contractors and sub-contractors, which can result in poor visibility for construction companies over modern slavery risks.

Construction supply chain risks

Sector	Example service or product potential	Potential risks identified
Bulk materials	Quarrying, concrete, steel	<ul style="list-style-type: none">• Forced labour• Human trafficking• Child labour
Service provider	Labour hire, landscaping, cleaning	<ul style="list-style-type: none">• Wages, penalties and working hours• Forced/Compulsory labour• Child labour
Transportation	Transportation of plant/heavy machinery	<ul style="list-style-type: none">• Human trafficking• Forced/Compulsory labour• Child labour
Plant, equipment and machinery	Raw materials and manufacturing	<ul style="list-style-type: none">• Forced/Compulsory labour• Human trafficking• Child labour• Wages and working hours
Technology	Electronic devices, laptops	<ul style="list-style-type: none">• Forced/Compulsory labour• Child labour• Wages and working hours



Addressing the risk of modern slavery practices

Since our incorporation, DTI has created and implemented a comprehensive suite of policies and procedures which support and guide the business in the delivery of our projects and wider operations in understanding and mitigating both real and potential modern slavery risks in our operations and supply chains.

In addition to adoption and implementation of these policies and procedures, we are continuously working towards enhancing our risk management processes, to ensure that we adhere to the highest ethical standards, comply with relevant laws, and promote transparency and accountability across all business relationships.



Policies and governance:

Our **Modern Slavery Policy** establishes a commitment to ethical practices and legal compliance, promoting continuous improvement and collaboration with all employees and suppliers. This policy forms the cornerstone of our commitment to prevent any form of human rights abuse, including slavery, servitude, forced labour, and human trafficking. It emphasises the importance of recognising and reporting any concerns related to modern slavery and ensures that everyone in the organisation is aware of their responsibilities.

Our **Speak Up Policy** encourages the reporting of genuine concerns of malpractice, improper conduct, or misconduct in the workplace. This includes unlawful, unethical, fraudulent, or undesirable activities related. Our Speak Up Policy aims to promote a culture of honesty, integrity, and accountability by providing accessible and safe reporting mechanisms and protecting individuals who disclose serious wrongdoing. All legitimate disclosures are thoroughly investigated.

Our **Employee Code of Conduct** sets the standards of behaviour expected from our employees. It is applied to all employees, with no exemptions. It demonstrates DTI's commitment to being respectful and ethical in all aspects of the business. The expectation is that our employees and everyone involved in the businesses recognises the Code and adheres to it.

The **Supplier Code of Conduct** sets clear expectations for our suppliers and subcontractors, requiring them to operate with honesty, integrity, and transparency. This code highlights the necessity of respecting human rights and adhering to all applicable laws, including those pertaining to modern slavery. By setting high ethical standards and fostering an environment of mutual respect and accountability, we are committed to identifying, addressing, and mitigating modern slavery risks within our supply chains.

The **Supplier and Subcontractor Checklist** further strengthens our risk management efforts by providing a structured approach to evaluating the risk profiles of our suppliers and subcontractors. This checklist helps us gather critical information on their compliance with modern slavery policies and relevant laws, enabling us to develop targeted strategies to manage identified risks effectively. It also ensures that all contractual obligations related to modern slavery are clearly understood and met by our suppliers.

Our **Procurement Framework** outlines the framework for the DTI's procurement operations, guiding all team members through a consistent, transparent, and compliant procurement process. It is essential for ensuring that procurement activities align with our strategic goals, legislative requirements, and ethical standards. We have a 100% digital procurement process where all subcontractors and major suppliers undergo a pre-qualification process prior to award of any works.

Together, these documents create a robust framework for preventing modern slavery in our operations and supply chains. They ensure that we remain vigilant, proactive, and committed to upholding the highest standards of ethical conduct and human rights protection.

Assessing the effectiveness of our actions

DTI is committed to continuously ensuring our efforts to prevent modern slavery are effective. Our company values and policies provide a cultural framework to inform the behaviour of our people. While the responsibility for modern slavery risk management lies with the procurement and commercial teams, everyone at DTI has a responsibility to ensure that any business or person we conduct business with abides by our Codes of Conduct and relevant policies. We have implemented several key processes to monitor and improve the impact of our actions:

Audits and risk assessments

We conduct regular audits and risk assessments of suppliers, particularly in high-risk sectors and regions. These audits ensure compliance with our Supplier Code of Conduct. In future projects with increased risk, we will increase collaboration with international suppliers to manage modern slavery risks more effectively.

Supplier due diligence

All suppliers undergo a qualification and tender process, where we evaluate their policies and procedures related to modern slavery. We also conduct ongoing due diligence, monitoring supplier performance and addressing any identified risks. Non-compliant suppliers may face termination if corrective actions are not implemented.

Monitoring and reporting

We track modern slavery risks through internal reporting mechanisms via our "Speak Up" policy, which allows stakeholders to report concerns. Regular reviews of audit data and incident reports help us spot trends and address systemic risks.

Training

We provide regular training for employees to ensure they are equipped to identify and address modern slavery risks. Training programs are updated to reflect any changes in our operations and regulatory environment. During this reporting period, we had 75 staff complete the Procurement Fundamental training module – which includes a section on Modern Slavery awareness and the associated DTI policy and procedures.

Continuous improvement

We regularly review and update our policies, procedures, and practices based on audit results, stakeholder feedback and industry developments. This ensures our approach remains proactive and effective and up to date as we expand into new sectors like renewable energy.

Policy and governance

DTI has established a comprehensive policy framework to support adherence to the high ethical standards and to enable us to assess and minimise modern slavery risks across our operations. Our Modern Slavery Policy and Supplier Code of Conduct set clear expectations for employees, suppliers, and subcontractors, ensuring supply chain compliance with human rights obligations and promoting a culture of accountability in our business and supply chain.

Grievance and remediation

DTI is committed to providing accessible grievance mechanisms to address concerns related to modern slavery and human rights. Through our "Speak Up" policy, employees, suppliers, and stakeholders can confidentially report any unethical practices or suspected modern slavery incidents. This commitment to transparency and remediation ensures that issues are resolved promptly and that all parties in our supply chain are treated with fairness and respect.

Consultation process

DTI has engaged with key internal and external stakeholders to ensure a comprehensive approach to identifying and mitigating modern slavery risks.

Internal stakeholders

Procurement and commercial teams:	Responsible for supplier assessments and audits, ensuring compliance with our Supplier Code of Conduct and modern slavery policy. We regularly consult them to ensure robust processes and effective risk management.
Legal team:	Provide guidance on legislative requirements under the <i>Modern Slavery Act 2018</i> (Cth) and ensure our procedures, processes and contracts meet regulatory standards.
Senior leadership team:	Our senior leadership team, and the board of directors, are actively involved in overseeing and approving our modern slavery strategy, ensuring it remains a key priority.

External stakeholders

Suppliers:	We support open dialogue with suppliers to promote ethical practices and address any identified risks. Regular reviews and feedback sessions help ensure ongoing compliance with our standards.
Industry bodies:	We collaborate with organisations like the Australian Constructors Association and the Infrastructure Sustainability Council Australia to stay informed on best practices and supply chain risks, enhancing our due diligence processes.
Joint venture partners:	On JV projects, we work closely with partners to align our modern slavery efforts and maintain ethical standards across all operations.
NGOs and experts:	We consult with NGOs and human rights experts like Walk Free to understand global supply chain risks and improve our strategies, particularly in high-risk regions and sectors.

Ongoing engagement

We actively engage with a range of stakeholders, including suppliers, industry bodies, NGOs, and worker representatives, to continuously refine our modern slavery strategy. This engagement includes regular feedback sessions and participation in industry initiatives focused on best practices for modern slavery risk management. As we expand into renewable energy projects, we are prioritising dialogue with suppliers in high-risk regions to address supply chain challenges proactively. Insights from these engagements directly inform our due diligence processes, audit schedules, and training programs, enabling us to respond effectively to emerging risks.

FY25 commitments

Our commitment to abolishing modern slavery is unwavering, and we recognise the importance of continually advancing our approach to tackle this complex issue. As we move forward, we are committed to enhancing our practices, expanding oversight, and engaging more deeply with our supply chain partners. For FY25, we have identified several key commitments to strengthen our efforts, which include:

Commitment	Embedding approach
Enhance supplier due diligence processes	Define/implement a tiered risk-based approach for suppliers.
Undertake a spend based risk assessment	Conduct a modern slavery risk assessment of our spend to define our most salient risks.
Develop a formal risk assessment framework	Conduct regular risk assessments using a consistent methodology, including worker voice data, supply chain mapping, and geographical risk factors.
Strengthen training and awareness programs	Make training mandatory (for procurement, purchasing and commercial staff) with regular updates; use case studies and examples to help recognise modern slavery indicators.
Improve monitoring and reporting	Establish KPIs for audits, training, incidents reported, and remediation; link KPIs to business performance and executive incentives.
Foster industry collaboration	Participate in industry forums, share best practices, align on standards, and collaborate on joint audits.

Approval

This Modern Slavery Statement was approved by the board of DT Infrastructure Pty Ltd on 29 November 2024.

Signed,



Ewan Yee
Director, DT Infrastructure Pty Ltd



