

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 (ABN 98 651 593 878) (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 & Sustainability, 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, North America, and Chile. Our major areas of supplier spend are rail infrastructure costs, which includes rail sleepers, turnouts, electrical components, labour and civil construction works.

We have consulted all relevant companies and business units in the development of this statement.

3. POLICY COMMITMENT

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

Martinus recognises that modern slavery risks can take many different forms that pose invariably different risks in different geographical locations. These risks can include forced labour, forced marriage, debt bonding, human trafficking, servitude, deceptive recruitment, sexual violence, and child labour. This is not a complete and exhaustive list; however, it is a list of risks that are present when managing an international supply chain. Our Modern Slavery procedure is developed to enable a framework to mitigate and address these risks as far as reasonably practicable across Martinus. To date, there have been no instances of modern slavery in our operations or supply chain. Our supplier evaluation assessment and selection process allow us to mitigate our supply chain risk. 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 work with suppliers that are aligned with our values. We expect our suppliers to operate in accordance with our standards, and in compliance with 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 Preventive Measures Procedure across our operations;
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, Treaven Martinus (Chief Executive Officer) on 17 July 2025.

Authorised by:

Treaven Martinus
Chief Executive Officer

