



Modern Slavery Statement 2025

Loram Pty Ltd



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Mandatory Criteria Reference

This statement addresses all seven mandatory criteria under section 16 of the Modern Slavery Act 2018 (Cth):

s16	Mandatory Requirement	Section in This Statement
16(1)(a)	Identify the reporting entity	About This Statement
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	About Loram / Our Supply Chain
16(1)(c)	Describe the risks of modern slavery in the operations and supply chains of the reporting entity and any entities it owns or controls	Risks of Modern Slavery
16(1)(d)	Describe the actions taken to assess and address those risks, including due diligence and remediation processes	Actions to Assess and Address Risks
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	Assessing Effectiveness
16(1)(f)	Describe the process of consultation with any entities the reporting entity owns or controls, and the entity giving the statement (if applicable)	Consultation
16(1)(g)	Include any other relevant information	Continuous Improvement / Future Commitments

About This Statement

This Modern Slavery Statement has been prepared by Loram Pty Ltd (“Loram”) in accordance with the requirements of the Modern Slavery Act 2018 (Cth) (“the Act”). It covers the reporting period from 1 January 2025 to 31 December 2025.

Loram is committed to respecting human rights and maintaining ethical standards across its operations and supply chain. This statement outlines Loram’s approach to identifying, assessing and addressing the risks of modern slavery, consistent with its obligations under the Act.

Modern slavery includes serious forms of exploitation such as forced labour, human trafficking, servitude, debt bondage, child labour, forced marriage and deceptive recruitment practices. These risks may arise in both direct operations and extended supply chains.

This is Loram’s second Modern Slavery Statement and reflects continued development of its approach, including improvements made following feedback on the previous reporting period.

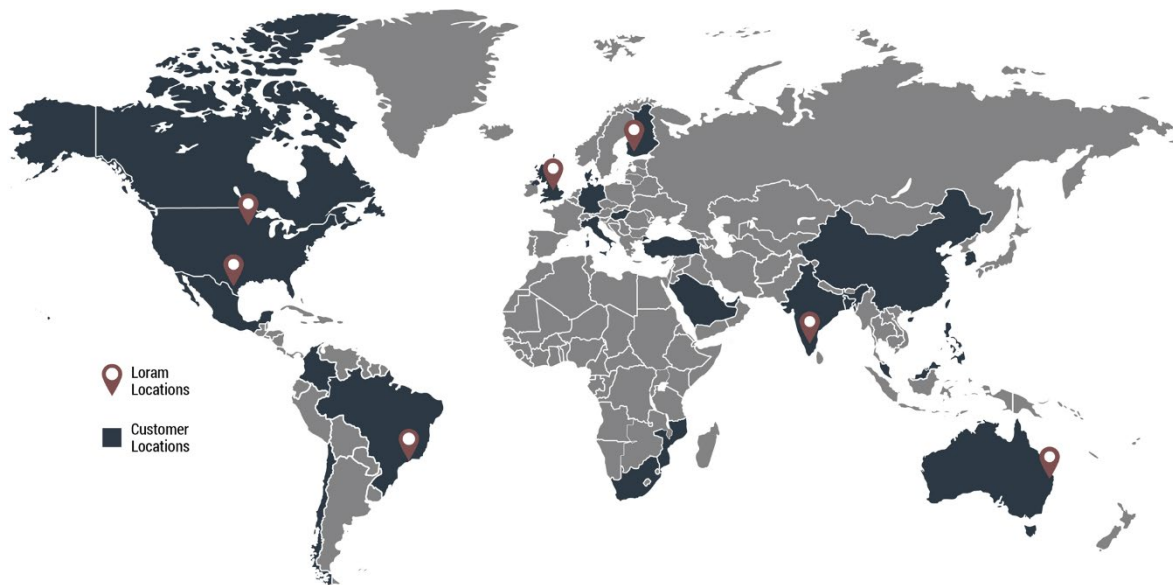
About Loram

Corporate Structure

Loram Pty Ltd is a wholly owned subsidiary of Loram Maintenance of Way Inc. (LMOW). LMOW is a global provider of rail maintenance services, equipment and technology.

LMOW operates across multiple regions including the United States, Canada, Brazil, the United Kingdom, Finland, Australia and India, employing over 1,800 personnel globally and operating more than 250 machines.

Loram Pty Ltd is the reporting entity for the purposes of the Act and does not own or control any other reporting entities in Australia.



Australian Operations

Loram has operated in Australia for over 65 years. Headquartered in Brisbane, Queensland, the business operates across all mainland Australian states, providing services to public and private rail network operators.

Loram employs approximately 250 personnel across operational, engineering and administrative roles. Employees are directly engaged in accordance with Australian workplace laws, including the *Fair Work Act 2009 (Cth)* and relevant industrial instruments.

Services

Loram's services in Australia include:

- Rail Grinding – precision maintenance of rail running surfaces to extend asset life and improve safety
- Friction Management – application of friction modifier products to reduce wheel and rail wear
- Inspection & Optimisation – track geometry, ultrasonic inspection and data analytics services

Values and Governance

Loram is governed by a Board of Directors and operates under LMOW's global values, which emphasise integrity, accountability and ethical conduct. These principles underpin Loram's approach to preventing modern slavery.

Our People

Loram maintains transparent and compliant recruitment and employment practices. All employees are engaged voluntarily and in accordance with Australian law.

The risk of modern slavery within Loram's direct Australian workforce is assessed as low, supported by:

- A skilled workforce directly employed in Australia
- Application of national employment laws and industrial protections
- Absence of high-risk employment practices

No indicators of modern slavery have been identified within Loram's workforce during the reporting period.

Our Supply Chain

Loram procures goods and services required to support specialised rail maintenance operations. This includes spare parts, assemblies, electronic components, consumables and professional services.

The supplier base is relatively stable and primarily comprises established industry participants.

Loram sources from suppliers across Australia, North America, Europe and Asia, creating indirect exposure to jurisdictions where modern slavery risks may be higher.

Risks of Modern Slavery

Loram has assessed modern slavery risks across its operations and supply chain, considering workforce profile, procurement categories and geographic exposure.

Direct Operations

Risk in direct operations is assessed as **low**, reflecting:

- Direct employment model
- Strong regulatory environment
- Established recruitment and governance practices

Supply Chain

Risk in the supply chain is assessed as generally low, with elevated risk in certain procurement categories and geographies, particularly:

- Manufacturing of components in parts of Asia
- Limited visibility beyond Tier 1 suppliers

Most procurement is with established Tier 1 suppliers, which reduces direct risk. Residual risk remains in extended supply chains beyond Tier 1.

No instances of modern slavery have been identified in Loram's operations or supply chain during the reporting period.

Actions to Assess and Address Risks

Loram applies proportionate and practical controls to manage modern slavery risk.

Policies and Governance

- Code of Conduct
- Diversity, Equity and Inclusion Policy
- Whistleblower Policy

These frameworks support ethical business conduct and provide mechanisms for reporting concerns.

Supplier Due Diligence

Loram applies structured due diligence processes, including:

- Supplier pre-qualification questionnaires
- Third-party screening of suppliers
- Ongoing monitoring of supplier risk profiles
- Follow-up where potential risks are identified

Employee Training and Awareness

All employees complete induction training covering the Code of Conduct and modern slavery obligations.

Additional targeted training for procurement and operations personnel is planned for the next reporting period.

Remediation

No instances of modern slavery were identified during the reporting period.

Loram maintains processes to respond to any identified or suspected incidents, including escalation, investigation and engagement with relevant stakeholders where required.

Assessing Effectiveness

Loram monitors effectiveness through:

- Supplier due diligence outcomes
- Third-party screening results
- Reports raised through whistleblower or grievance channels

These processes continue to develop as the program matures.

Consultation

Consultation was undertaken with relevant internal functions and the parent entity (LMOW) in preparing this statement.

Loram Pty Ltd does not own or control any other entities in Australia.

Loram consulted with LMOW to:

- Align with global policies and frameworks
- Inform supply chain risk assessment
- Confirm access to global due diligence tools

This statement was developed through consultation across relevant internal functions within Loram, including:

- Operations
- Procurement
- Finance
- Human Resources

Continuous Improvement and Future Commitments

Loram is committed to improving its approach and intends to:

- Deliver targeted modern slavery training
- Strengthen supplier engagement through recertification and ongoing monitoring

Approval

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and constitutes the modern slavery statement of Loram Pty Ltd for the year ending 31 December 2025.

The statement has been approved by the Board of Directors of Loram Pty Ltd.




Glen Mullins
Director, Loram Pty Ltd

Date: 23 June 2026