	<p style="text-align: center;">Modern Slavery Statement</p> <p style="text-align: center;">HOLDCO HOLDINGS PTY LTD</p>	<p style="text-align: center;">HR POL 004 Version No: 02 Approved By: Brent Nally</p>
<p>Created Date: 26 April 2021</p>	<p>Last Revision Date: 14 June 2022</p>	<p>Printed Date: 24 September 2024</p>

## MODERN SLAVERY STATEMENT 2024

### 1. Introduction

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) for Consolidated Rail Holdings Pty Ltd including all wholly owned subsidiaries<sup>1</sup> (**Holdco**) for the period 1 July 2023 to 30 June 2024 (reporting period).

The ‘Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities’ (**Guidance**) describes modern slavery as *situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom*. It refers to *serious exploitation and encompasses human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment, and the worst forms of child labour*.

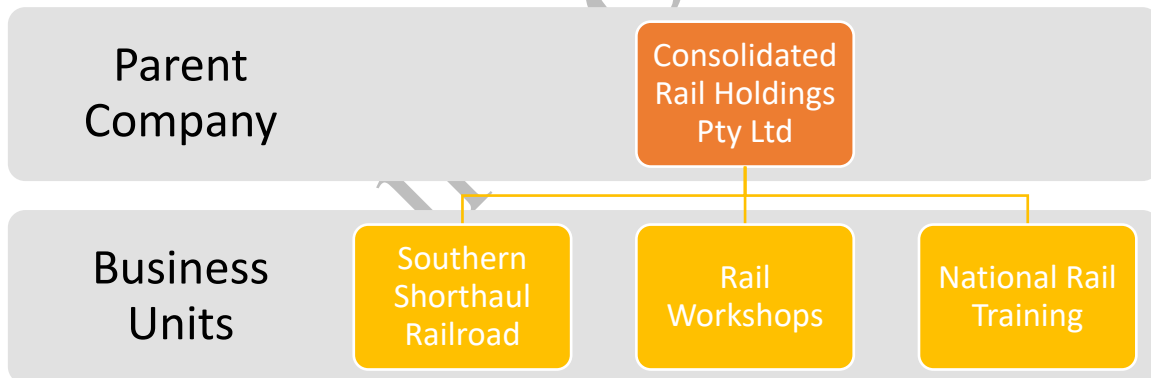
Holdco is committed to operating in accordance with all applicable laws and regulations and with high ethical standards.

### 2. Our structure, operations and supply chains

The Holdco’s head office is situated at 175 Murphy Street, East Bendigo, Victoria, 3550. Holdco is an Australian owned and operated customer-focussed full-service rail business operating throughout Australia. Holdco is an expert rail freight services operator and also has the ability and expertise to provide its customers with flexible and responsive equipment servicing and repair.

The Holdco workforce consists of more than 350 employees based throughout New South Wales and Victoria. Holdco is undergoing significant expansion.

The following is information on Holdco’s business units.




#### Southern Shorthaul Railroad (SSR)

SSR is an accredited rail operator with rail freight trains operating predominantly in New South Wales and Victoria. The core markets SSR operates in include:

- Grain and coal haulage;
- Intermodal freight;
- Testing and commissioning; and
- Rollingstock transfers.

<sup>1</sup> Including Holdco Holdings Pty Ltd, Coalemp No 2 Pty Ltd, Coalemp No 3 Pty Ltd, Coalemp No 4 Pty Ltd, Bendigo Rail Workshops Pty Ltd, Lithgow Railway Workshops Pty Ltd, and BN Rail Maintenance Pty Ltd.

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**Rail Workshops (RW)**

Based in Bendigo Victoria, and at sites in regional New South Wales, RW provides full maintenance services to both freight and passenger rail customers. The core services offered by RW include:

- Routine servicing, provisioning, and wagon periodic maintenance;
- Repairing locomotive faults;
- Undertaking accident repairs to rollingstock;
- Undertaking core component changeouts on locomotives;
- Upgrade and project specific tasks for passenger rail assets including component change outs and full paint works;
- Full strip down and overhaul;
- Bogie overhauls;
- Painting;
- Field service and provisioning; and
- Emergency recovery.

**National Rail Training (NRT)**

NRT is a Registered Training Organisation specialising in the delivery of rail specific training to SSR. NRT ensures staff within the organisation are trained and competent to complete their everyday tasks efficiently and safely.

**Supply chains**


Holdco’s main supply chain comprises a mixture of government entities, multi-national or national companies and local supplier partners that provide products or services. All regular suppliers are based within Australia. Holdco seeks to support other Australian businesses when it looks for suppliers and will opt for Australian-sourced products before overseas ones.

Core Areas of the Supply Chain		
Southern Shorthaul Railroad	Rail Workshops	National Rail Training
<ul style="list-style-type: none"> <li>• Fuel</li> <li>• Track access</li> <li>• Rollingstock hire</li> <li>• Maintenance of rollingstock including spare parts</li> <li>• Accommodation</li> <li>• Motor vehicle management</li> <li>• Information technology</li> <li>• Consumables</li> <li>• Recruitment</li> <li>• PPE/uniform</li> </ul>	<ul style="list-style-type: none"> <li>• Raw materials for manufacture</li> <li>• Components and spare parts</li> <li>• Consumables</li> <li>• Recruitment</li> <li>• PPE/uniform</li> </ul>	<ul style="list-style-type: none"> <li>• Stationery</li> <li>• Information technology (provided by Holdco)</li> <li>• Accommodation</li> </ul>

**3. Consultation with Holdco entities**

Holdco owns the entities in its corporate structure. Since Holdco’s last Statement, it has taken full ownership of the entities in its corporate structure. All business units owned and/or operated by Holdco continue to have common executive management and directorships. This team provides consistent corporate direction, oversight, and risk management across the corporate structure.

Through the ownership structure, and common executive managers and directors, the Holdco business units were engaged in the consultation process for this joint statement, and it has the approval of all business units in the Holdco structure.

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#### 4. Risks of modern slavery practices in Holdco operations and supply chains

The Guidance describes the risks of modern slavery practices as the potential for an entity to *cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.*

In order to manage and minimise the risk of modern slavery, Holdco has policies, procedures and practices in place to ensure that our business remains legally compliant, ethical, and in accordance with human rights standards. Employee entitlements and workplace conditions are governed by awards, enterprise agreements, and/or common law contracts. Employees who work on visas are provided with equivalent terms and conditions as local employees, and we provide additional assistance to help them settle in Australia. Employees are subject to policies and procedures that ensure they are treated, and treat each other, with fairness, respect and dignity, in accordance with applicable laws. Employees are provided with clear instruction and training in this regard as well.

Holdco acknowledges there is potential risk of modern slavery practices in its supply chain. This risk has been assessed to be very low due to the high compliance, component quality tracing and regulatory nature of the rail industry. This ensures suppliers are assessed by senior management prior to any engagement.

A small proportion of Holdco's procurement comes from overseas, for example China. Holdco acknowledges there is a higher risk of modern slavery in some overseas countries and has reviewed the Walk Free Global Slavery Index to inform itself of this. Holdco understands that the greatest risk of modern slavery arises through its overseas procurement.

#### 5. Actions taken to assess and address modern slavery risks

This is the fourth reporting period for Holdco. Holdco continues to focus on improving our understanding of modern slavery risks and how these risks may be present in our operations and supply chains, particularly as our business grows. As part of the due diligence process, we continue to focus on risk factors such as the industry we operate in, and the types of products and services we require to meet our customer requirements. A review of major suppliers has determined any instances of modern slavery practices occurring is very low risk, we cross reference our major suppliers against the Modern Slavery Statements Register and considered the statements of our suppliers. Holdco has extensive policies, procedures, and practices in place, including continuous improvement and review processes, to ensure that our businesses remain legally compliant and ethical.

We are proud of our culture and values, and our executive management team are highly engaged on a daily basis which ensures the business meets the needs and compliance of all stakeholders. We will continue to have our procedural controls and reviews in place to keep this risk as low as possible. We also consider the risk of modern slavery practices occurring in our major suppliers who are generally large companies as low, or if such risks have been identified they are being addressed, because these companies already have their own modern slavery compliance measures in place.


Holdco is reviewing its suite of commercial contracts and is looking at building in specific and definite modern slavery provisions into them. This is to help reduce the risk of modern slavery in our supply chain and to also help build the awareness of those we partner with about modern slavery and signal we do not want it in our business operations.

#### 6. Assessing the effectiveness of actions taken

During this reporting period, Holdco's executive management team worked to gain an understanding of the impacts of modern slavery on the individuals who unfortunately find themselves trapped in the various forms of this abhorrent practice. This is to help to help ensure that our executive management team is able to identify and respond to any actual or suspected incidences of modern slavery.

Holdco's executive management team also considered what others in the rail industry are doing to tackle the issue.

Additionally, the executive management team considered the Forced Labour Convention of 1930 in terms of it being a touchstone for consideration of modern slavery.

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**7. Focus for the next reporting period**

Holdco will focus on the following in the next reporting period:

- Looking at including modern slavery provisions in our commercial contracts.
- Continue to ensure that the executive management team, and senior and supervisory roles in our business understand modern slavery requirements.
- Continue to engage our smaller suppliers and obtain data to aid in identifying modern slavery risks in their operations and supply chains.
- Continue to work on developing frameworks and processes to assess the effectiveness of the actions taken to identify and address modern slavery risks.

This statement was approved by the Board of Directors.



Brent Nally  
Director – Corporate Services

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