

Modern Slavery Policy

Global Rail Australia Pty Ltd understands that the establishment of our business strategy and delivery of our business objectives can only be achieved by carrying out business openly, honestly and with integrity. We are accordingly committed to ensuring there is no modern slavery in our operations and supply chain. Breaches of this policy may result in disciplinary action up to and including termination of employment and termination of our relationship with other individuals and organisations working on our behalf or our suppliers and supply chain.

This policy forms part of our global policy framework, underpinned by our Global Code of Conduct and will be realised by:

- Prohibiting modern slavery in all forms, including threats of violence, harassment, discrimination and intimidation within our operations and supply chain.
- Ensuring that employees have freedom of movement, freedom of association and freedom to terminate employment, and communicating our expectation of the same from all of our contractors, suppliers, and other business partners, including that they ensure the same from their own suppliers.
- Prohibiting the use of worker-paid recruitment fees within our operations and supply chain.
- Prohibiting compulsory overtime within our operations and supply chain.
- Prohibiting child labour.
- Prohibiting the confiscation of workers' original identification documents and communicating our expectation of the same from all of our contractors, suppliers, and other business partners, including that they ensure the same from their own suppliers.
- Appropriately supporting victims of modern slavery in identifying access to remedy, compensation, and justice.
- Ensuring that we understand and comply with the labour/employment laws and laws against slavery applicable to Global Rail Australia in the jurisdictions in which we operate.
- Training employees to ensure they understand the standards expected of them.
- Implementing effective due diligence procedures and other controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains and communicating our expectation of the same high standards from all of our contractors, suppliers, and other business partners, that they will hold their own suppliers to the same high standards.
- Ensuring that effective arrangements are in place to allow employees to report where they have concerns about modern slavery, and to ensure that such concerns are investigated and reported appropriately to the relevant authorities.
- Ensuring that no one who uses our 'speak up' procedures are subject to victimisation as a result of reporting any suspicion of modern slavery.
- Ensuring appropriate oversight of our modern slavery program.
- Reviewing this policy regularly to ensure its effectiveness.

Modern slavery is a violation of fundamental human rights through the severe exploitation of other people for personal or commercial advantage and includes securing services from children and persons vulnerable to modern slavery, slavery, servitude, forced or compulsory labour, human trafficking, debt bondage and deceptive recruiting for labour or services.

Global Rail Australia expects compliance with this policy across all its global operations. This policy applies to all employees and officers of Global Rail Australia. It also applies to all persons working for us or on our behalf in any capacity, including all employees, directors, officers, agency workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners, and includes suppliers to Global Rail Australia.

Overall responsibility for this policy rests with the Company Directors of Global Rail Australia.

Signed 10th January 2024, for and on behalf of Global Rail Australia Pty Ltd by



Ivan Holloway
Managing Director