



MODERN SLAVERY PROCEDURE

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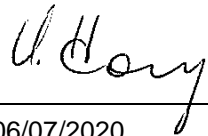
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DOCUMENT CONTROL STATUS

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1. INTRODUCTION

One Rail Australia Pty Ltd ABN 17 079 444 296 (**One Rail** or the **Company**) and its related bodies corporate (collectively “the **Group**”) are committed to the highest standards of conduct and ethical behaviour.

The standards of behaviour expected by the Group are outlined in the HR-PRC-007 Code of Conduct and Ethics (the Code) and other policies adopted by the Group which have been developed to ensure that the Group observes the highest standards of fair dealing, honesty and integrity in its business activities.

One Rail is committed to limiting the risk of Modern Slavery occurring within its own business, infiltrating its supply chains or through any other business relationship. This procedure applies to all persons working for or on behalf of One Rail, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

One Rail expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this procedure and to act in a way that is consistent with its values.

This procedure will be used to underpin and inform any Modern Slavery Reports that the Company is required to produce in accordance with the Modern Slavery Act 2018 (Cth) (The Act).

What is Modern Slavery?

The term Modern Slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception in situations of modern slavery can sometimes involve clear physical indicators, such as physical confinement or confiscation of identity and travel documents. However, often coercion, threats and deception are more subtle and harder to identify.

The Act defines Modern Slavery as including eight types of serious exploitation. Each of these types of exploitation has a clear legal definition in international or Australian law.

Trafficking in Persons: describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.

Slavery: describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

Servitude: describes situations where the victim’s personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.

Forced Labour: describes a situation where the victim is either not free to stop working or not free to leave their place of work.

Forced Marriage: describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony. The Company is required to report on forced marriage in situations where activities all the activities of entities in its supply chain may cause or contribute to forced marriage.

Debt Bondage: describes situations where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

Child Labour: The worst forms of child labour describe situations where children are:

- exploited through slavery or similar practices, including for sexual exploitation; or,
- engaged in hazardous work which may harm their health, safety or morals; or,
- used to produce or traffic drugs.

The worst forms of child labour can occur in a variety of contexts and industries. This may include orphanage trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining and agriculture.

Deceptive Recruiting for Labour or Services: describes situations where the victim is deceived about whether they will be exploited through a type of Modern Slavery.

All forms of Modern Slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling Modern Slavery requires employees to play a part and remain vigilant to the risk in all aspects of One Rail business and its business relationships.

2. WHO DOES THIS PROCEDURE APPLY TO?

This procedure applies to an individual or an organisation who is:

- An employee or officer of an entity in the Group; or,
- A supplier of services or goods (whether paid or unpaid) to an entity in the Group including an individual who is or has been employed by such a supplier.

3. EMBEDDING THE ANTI-SLAVERY POLICY IN PRACTICE

To underpin the commitments laid out in this procedure, One Rail aims to implement the following measures:

- One Rail will conduct risk assessments to determine which parts of the business and which supply chains are most at risk from Modern Slavery so efforts can be focused in the areas that are most 'at risk'.
- Where appropriate, as informed by the risk assessment, One Rail will engage directly with new suppliers in respect of this procedure in order to gain a proper understanding of the measures they have in place to ensure that Modern Slavery is not occurring within their own businesses.
- Moving forward our contractual documentation will endeavour to incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this procedure.
- We will also endeavour to make a provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this procedure.
- Our zero-tolerance approach is supported by our HR-PRC-005 Whistleblower Procedure.

4. RESPONSIBILITY FOR THIS PROCEDURE

The Senior Leadership Team (SLT) has overall responsibility for this procedure and in ensuring that One Rail complies with all its legal and ethical obligations.

The Chief Financial officer (CFO) will have the primary day-to-day responsibility for the implementation of this procedure, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All non-executive managers are responsible for ensuring that their subsidiary complies with the provisions of this procedure in the day to day performance of their roles.

5. COMMUNICATION AND EMPLOYEE AWARENESS TRAINING

One Rail Employees involved in the management of procurement processes will receive adequate training on this procedure and any supporting processes applicable to their role.

6. BREACHES OF THIS PROCEDURE

The breach of this procedure by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

All will fully be expected to co-operate in any investigation into suspected breaches of this procedure or any related processes or procedures.

If any part of this procedure is unclear, clarification should be sought from Human Resources or the Chief Financial Officer (CFO).

7. REVIEW OF THIS PROCEDURE

This procedure will be reviewed from time to time. This is so the Policy remains consistent with applicable standards and relevant legislative requirements as well as the changing nature of the Group.