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## voestalpine Railway Systems Australia Pty Ltd

### Modern Slavery Statement for the Financial Year April 2024 - March 2025

**voestalpine**

ONE STEP AHEAD.

Contents

1 About this Statement..... 3

2 Structure, operations, and supply chains..... 4

2.1 Structure..... 4

2.2 Operations..... 4

2.3 Supply chain..... 4

3 Approach to identifying modern slavery risks..... 5

3.1 Operational risk ..... 6

3.2 Supply chain risk ..... 6

4 Approach to addressing modern slavery risks ..... 7

4.1 Policy and governance..... 7

4.2 Risk assessment and supplier engagement ..... 7

4.3 Workforce and capability building ..... 8

4.4 Grievance and remedy ..... 9

5 Building maturity and assessing effectiveness ..... 9

6 Board approval..... 10

# 1 ABOUT THIS STATEMENT

voestalpine Railway Systems Australia Pty Ltd (voestalpine) has developed this Modern Slavery Statement (Statement) for the purposes of reporting under the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act). This Statement applies to our financial year beginning on 1 April 2024 and ending 31 March 2025 (Reporting Period). This is the fifth period in which we met the consolidated revenue threshold for reporting under the Modern Slavery Act. We are pleased to outline the progress we have made over the last financial year regarding our approach to identifying and managing modern slavery risk in our operations and supply chains.

During this Reporting Period, we have continued to progress in our modern slavery journey. Key steps include publishing our [Human Rights Statement](#), developing a Supplier Modern Slavery Due Diligence Protocol and Supplier Modern Slavery Risk Assessment Tool and introducing additional tailored modern slavery training for our workforce. We are committed to further embedding our response to modern slavery over the course of our next financial year.

This Statement covers the seven mandatory criteria for reporting under the Modern Slavery Act. The table below indicates where within this Statement each criterion is addressed.

Mandatory reporting criteria	Section
Identify the reporting entity	1
Describe the reporting entity’s structure, operations and supply chains	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4
Describe how the reporting entity assesses the effectiveness of these actions	5
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	2
Any other relevant information	5

## 2 STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

### 2.1 STRUCTURE

Our structure remains the same as in the last reporting period. We do not own or control any entities. We are ourselves part of the voestalpine AG network (voestalpine Group), the global leader for railway infrastructure system solutions. voestalpine Group is based in Linz, Austria and is listed on the Vienna Stock Exchange. Our position within the voestalpine Group is set out below.

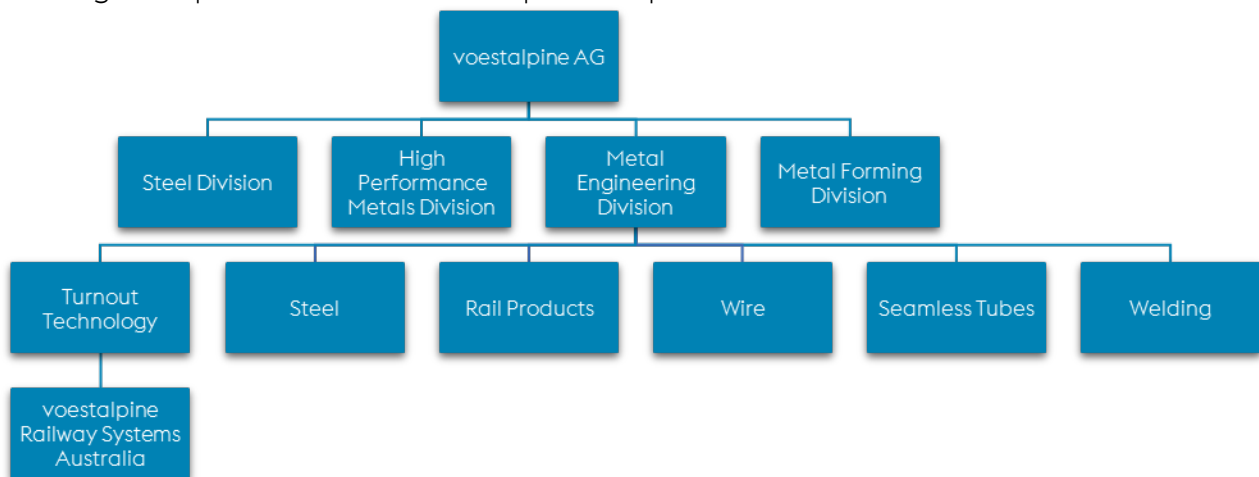


Figure 1: voestalpine Group structure

### 2.2 Operations

We provide railway infrastructure system solutions, products, logistics and services for rails, turnout, signalling and monitoring applications.

The key operational teams within voestalpine consist of:

- Human Resources, Sales, Finance, Supply Chain and Information Technology, all under the supervision of the Chief Executive Officer; and
- Production Mackay, Production Bathurst, Health Safety Environment and Quality (HSEQ), Engineering and Technical Services departments, managed by the Chief Operations Officer.

In terms of our physical footprint, we operate factories in Mackay, QLD, and Bathurst, NSW, and have an office in Sydney, NSW. Our factories manufacture turnouts, crossings, and switches for railways, metros, and tramways (including light rail).

At the time of submitting this Statement, we have a total of:

- 147 full-time, part-time, and casual employees;
- 4 labour hires at Mackay and Bathurst; and
- 9 apprentices and trainees.

### 2.3 Supply chain

During the Reporting Period, approximately 90% (by spend and transactions) of our goods and services were procured locally from Australia. The remaining goods and services were procured from Europe and the United States of America – all of which were from companies within the voestalpine Group.

Main goods and services procured from Australia:

- Steel
- Concrete
- Transport services
- Facilities management services

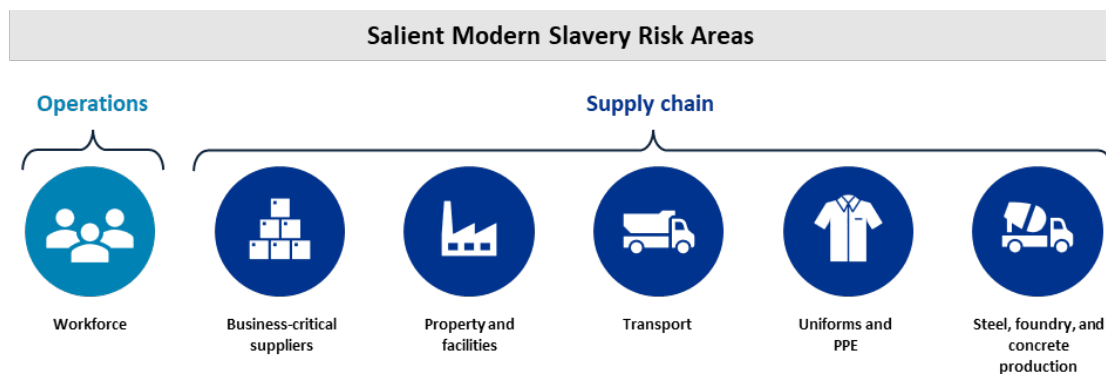
Main good and services procured from overseas:

- **Germany:** rail switch machinery and parts, rail switch locks and operating rods, grooved rails, grooved rail switches and turnouts; and
- **Austria:** deep head harden rails and switch rails.

### 3 APPROACH TO IDENTIFYING MODERN SLAVERY RISKS

voestalpine engaged external human rights specialists to support with the identification of inherent modern slavery risks in our operations and supply chains in 2021, and this process has guided our modern slavery approach in the proceeding years.

Figure 2 below sets out our known salient modern slavery risks, however, we have not completed further risk identification exercises since 2021 and acknowledge that the modern slavery risk presented by these areas may have changed over time. There also may be other areas of the business where modern slavery risk may have increased since the initial risk identification exercise.



*Figure 2: Salient Modern Slavery Risk Areas*

### 3.1 Operational risk

#### Workforce

voestalpine regularly engages workers in categories that are known to be associated with heightened modern slavery risk, including international workers, employees with particular visa conditions, contract employees and workers recruited through third party recruitment agencies/labour hire companies (e.g. to support manufacturing). We understand that vulnerable populations comprise a significant portion of people employed in contract roles, and those who are hired through recruitment agencies and labour hire companies, which elevates the risk of these workers experiencing some form of forced labour, particularly debt bondage. Our recruitment model seeks to mitigate some of this risk (see [section 4.3 Workforce and capability-building](#)).

### 3.2 Supply chain risk

#### Business-critical suppliers

A significant portion of our procurement is of specialist materials and products, for which suppliers are limited. We understand that business-critical procurement in niche industries can present higher modern slavery risk, as our leverage to require supplier conformance in modern slavery risk management and incident response is more limited comparative to more competitive markets.

#### Property and facilities

We operate factories in Australian regional hubs in Mackay and Bathurst, and lease a corporate office in Sydney. We prioritise small, local companies for procurement of property and facilities management services in our regional sites, as this aligns with our intention to support the communities in which we operate. Property and facilities management is known for its exposure to multiple modern slavery risk factors in Australia, due to the prevalence of low-skilled labour and often-poor visibility over the labour contracting relationship.

#### Transport

Air, sea and road freight services represent a significant spend category, with 52% of our bulk freight moved by rail (predominantly Australian East Coast Rail), 15% by sea freight, 30% by road freight and less than 3% by air freight. We understand that these sectors are particularly susceptible to modern slavery risk. This is due to a variety of intersecting factors, including isolated working conditions, prevalence of vulnerable workers from high-risk geographies, and constrained operational costs which can result in cost-cutting measures affecting working conditions.

#### Uniforms and personal protective equipment (PPE)

The production of uniforms and PPE can often involve low-skilled labour in high-risk geographies; these products are a known area of modern slavery risk. voestalpine sources uniforms and PPE locally from suppliers in Mackay and Bathurst. These products are manufactured in China and Southeast Asia by a short list of Tier-2 suppliers, all but one of which are reporting under the Modern Slavery Act. We plan to further interrogate this risk in the next reporting period.

#### Steel, foundry, and concrete production

As specified above, we procure a large amount of steel and concrete both domestically and through our parent company, based in Austria. voestalpine Group identifies forced and child labour as a particular risk in the supply chain for raw materials such as iron, sand and cement based on known risk factors for those materials, including the countries of origin of voestalpine Group's suppliers. voestalpine does not have direct visibility over Tier-2 and below suppliers sourced from through Group, however, Group has a modern slavery risk management strategy for this supply chain (see [section 4 Approach to addressing modern slavery risk](#)).

## 4 APPROACH TO ADDRESSING MODERN SLAVERY RISKS

Overview of key actions undertaken in the Reporting Period	
Published Human Rights Statement	Developed Supplier Modern Slavery Due Diligence Protocol
Developed Supplier Modern Slavery Assessment Tool	Updated and rolled out modern slavery training

### 4.1 POLICY AND GOVERNANCE

The voestalpine Group Code of Conduct states that we regard human rights as fundamental values that must be observed by all employees, in accordance with the International Bill of Rights, the United Nations Guiding Principles on Business and Human Rights, the principles of the United Nations Global Compact (UN Global Compact), and the core labour standards of the International Labour Organisation (ILO). This Group Code of Conduct applies to employees and executives, while suppliers are expected to adhere to the standards outlined in the Code of Conduct for Business Partners.

Additionally, the [Human Rights Statement](#) which was under review during the last reporting period, has been published during this Reporting Period and can be accessed via our website. This statement confirms and sets out our commitment to respecting human rights and aligns the company's activities with the United Nations's Universal Declaration of Human Rights and the 10 principles included in the UN Global Compact.

Our Board is responsible for our ongoing response to the Modern Slavery Act, with operational responsibilities resting with the Modern Slavery Working Group. The Working Group is chaired by the Financial Controller who supports the Modern Slavery Risk Coordinator, a role held by the Supplier Manager. The Working Group also includes the Human Resources Manager and the HSEQ Manager. It meets on a quarterly basis to discuss developments relating to modern slavery in our supply chain and operations. The Modern Slavery Working Group also monitors Group-level directives relating to human rights and modern slavery and works towards ongoing maturing of our modern slavery risk management.

### 4.2 RISK ASSESSMENT AND SUPPLIER ENGAGEMENT

We require suppliers to agree to conform to the expectations laid out in the Group Code of Conduct, including the sections related to forced and child labour. Supplier contracts include requirements for conformance with the Group Code of Conduct, and require a right to audit and implement corrective action measures where non-conformance is found.

voestalpine also has a self-assessment questionnaire (SAQ) for suppliers that has been in place since 2023 to undertake a high-level alignment check. We require suppliers to complete SAQ in line with our Code of Conduct for Business Partners at voestalpine Railway Systems Australia. The SAQ was further reviewed and refined during the Reporting Period to gain further visibility and alignment with best practice.

In line with our goal from the last reporting period regarding risk identification and management at supplier level, we consulted with an external human rights specialist to create the Supplier Modern Slavery Due Diligence Protocol. This protocol supports a systematic and consistent approach to identifying and assessing modern slavery risks associated with new and existing suppliers. It outlines a standard protocol for undertaking modern slavery due diligence in relation to prospective suppliers, and for conducting ongoing monitoring of these suppliers throughout the supplier lifecycle. This protocol will provide the foundation for our supplier's modern slavery due diligence process and will be reviewed and refined regularly to reflect the maturing and evolving ambition of our modern slavery approach.

As part of the risk assessment outlined in the protocol, we have also developed a Supplier Modern Slavery Risk Assessment Tool. This tool evaluates the modern-slavery-related management systems and controls at the supplier level based on supplier responses to the SAQ and determines a residual risk rating for each supplier. The supplier responses and the residual risk rating will further support us to understand our exposure to modern slavery risks in the supply chain and how we can prioritise further due diligence and mitigation activities.

Currently, we are developing an implementation plan for the Supplier Modern Slavery Risk Assessment Tool, with our key focus being the adoption of these processes and tools to mature our supplier engagement and modern slavery due diligence approach.

During this Reporting Period, there was also an increased focus on addressing and overseeing modern slavery risks by voestalpine Group, aligning to the evolving regulatory environment in the EU. This increased due diligence at Group level correspondingly reduces our exposure to modern slavery risk in the small, non-Australian segment of our supply chain, which consists entirely of procurement from Group companies.

#### **4.3 WORKFORCE AND CAPABILITY BUILDING**

Every voestalpine employee receives a contract that is compliant with Australian labour laws and awards, and a one-off mandatory online training on the voestalpine Group Code of Conduct as part of their onboarding with voestalpine. The online training is broad and covers topics across procurement, supply chain, recruitment, and child labour. It includes a mandatory assessment at both local and Group levels. A human rights learning module was also developed at Group level in FY21-22 and added to the learning plans of staff across the broader voestalpine Group, including our own personnel here in Australia. During the Reporting Period it was completed by 67 employees.

In this Reporting Period, we introduced new e-learning modules designed to address the critical issues of forced labour and sexual harassment. These modules were completed by 21 employees from various departments including Production, Supply chain, Sales, Human Resources, Finance, HSEQ, Services and the executive team. New employees are required to complete this training upon joining the voestalpine, with a subsequent annual refresher course to ensure ongoing compliance and awareness. In addition, our induction presentation for new starters now incorporates a modern slavery briefing, integrating modern slavery content at various stages and aspects of their onboarding process.

New employees joining our Procurement team undertake further training that is tailored to their role and responsibilities. This training includes content on human rights and modern slavery issues. In this Reporting Period, we had 10 team members complete the induction training, with the same 10 due to complete refresher training before the end of the next reporting period.

Our model for the hire and onboarding of contractors also mitigates modern slavery risk. We engage two recruitment companies in the process for employing contract staff and work closely with these companies to hire contractors on long-term contracts rather than short-term. Recruitment companies go through the same supplier agreement and the employment process is at no cost to candidates. We



ensure that contract employees are remunerated in accordance with the applicable legal regulations and collective agreements and provide clear guidelines on working hours. We also ensure that contractors receive the same onboarding processes and wages as our employees. We offer ongoing employment options to contractors once they have completed their contract period.

Workers in labour roles at our factories are required to provide their own uniform. If they do not have suitable clothing, they may purchase their uniform and pay via wage deduction over a period of time. This is the only potential cost to employees at onboarding.

#### **4.4 GRIEVANCE AND REMEDY**

voestalpine's Group-level whistleblowing procedure and a hotline number is made available to employees, and is contained within several policy documents including the Code of Conduct and Code of Conduct for Business Partners that are provided to suppliers. The committee procedure for whistleblowing remains unchanged since the last reporting period. The whistle-blowing hotline is displayed on television screens in shared spaces in the office, made accessible to employees on site. As well as a hotline, the Group-level whistleblower system includes a web-based portal where employees and business partners can report misconduct, such as human-rights-related concerns.

Our Complaints Handling Procedure outlines the process for submitting a formal complaint and affects all employees of voestalpine. There have been no updates to this Procedure in this Reporting Period. The committee structure also remains unchanged. During the Reporting Period, there were no modern slavery or human rights related grievances recorded that related to voestalpine. We understand that while we have these systems in place, we lack an action plan for grievance and remediation handling particularly for issues that lie outside the organisational structure of voestalpine.

In enhancing employee training on modern slavery, we aimed to create seamless connections between the training and practical application. We incorporated information on the whistleblower system in the e-Learning module so that the employees have a comprehensive understanding of available support mechanisms. Additionally, we are currently updating the onboarding information package to include the relevant contact persons for modern slavery concerns, the whistleblower web page, and an organisational chart of the risk committee.

## **5 BUILDING MATURITY AND ASSESSING EFFECTIVENESS**

We are proud of all the efforts and progress made in strengthening our modern slavery risk management this Reporting Period. During the Reporting Period, our focus has been on establishing frameworks to effectively facilitate supplier engagement and risk management, as well as deploying training comprehensively to employees in different locations and levels. Looking ahead to the next reporting period, our primary areas of focus will include:

- further socialising and embedding the Supplier Modern Slavery Due Diligence Protocol and the Supplier Modern Slavery Assessment Tool;
- operationalising the Supplier Modern Slavery Assessment Tool, prioritising our highest risk suppliers and supply chains; and
- enhancing engagement with suppliers based on their responses to the SAQ.

While we have made progress on the goals we committed to in this Reporting Period, we acknowledge that we have a long journey ahead to achieve comprehensive modern slavery risk management

practice. By striving to achieve our key actions (as identified above) in the next reporting period, we will continue to grow our maturity in modern slavery risk management.

**6 BOARD APPROVAL**

This Statement was submitted and approved by the board of voestalpine Railway Systems Australia Pty Ltd on 26 May 2025.

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Kylie Huth  
Chief Executive Officer