

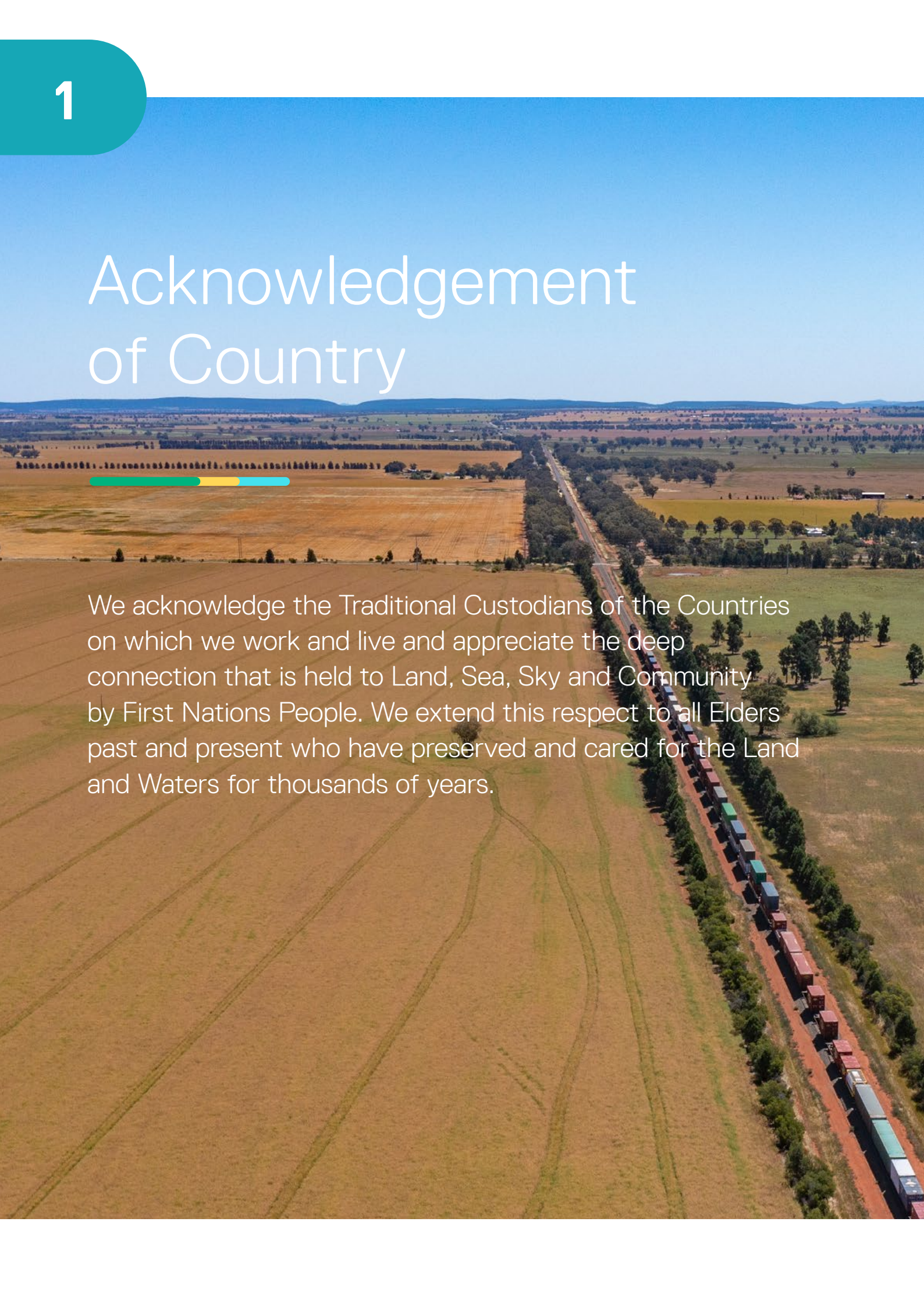
Inland Rail Modern Slavery Statement 2025



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Acknowledgement of Country

An aerial photograph of a long freight train stretching across a vast, flat, brownish-yellow landscape under a clear blue sky. The train consists of many colorful containers (red, green, blue, and white) and is flanked by a line of trees. The landscape is mostly open fields with some distant hills on the horizon.

We acknowledge the Traditional Custodians of the Countries on which we work and live and appreciate the deep connection that is held to Land, Sea, Sky and Community by First Nations People. We extend this respect to all Elders past and present who have preserved and cared for the Land and Waters for thousands of years.

About this Statement

On behalf of Inland Rail Pty Ltd (**IRPL**), we are proud to release our inaugural Modern Slavery Statement to address the requirements of the ***Australian Modern Slavery Act 2018 (Cth)*** (the **Act**), as part of our broader commitment to integrity, transparency and transformation.

This is Inland Rail's first Modern Slavery Statement, following:

1

The establishment of Inland Rail on 1 May 2024 as a subsidiary of Australian Rail Track Corporation (**ARTC**), which itself reports under the Act.

2

Ongoing consultation and collaboration with ARTC regarding the Inland Rail project throughout the FY25 reporting period.

3

Inland Rail meeting the criteria of a *Reporting Entity* in Section 5 of the Act.

The reporting period covered by this Statement is 1 July 2024 to 30 June 2025 (FY25). Prior to this, the Inland Rail project was included in ARTC's reporting under the Act, including for the full year of FY24.

This Statement summarises our approach to preventing modern slavery within our operations and supply chain. This includes actions undertaken in FY25 to assess and address modern slavery risks and maintain our focus on continuous improvements on how we manage modern slavery risks.



Mike Zambelli
Interim CEO



Dr Collette Burke
Chair



About Inland Rail Pty Ltd

3.1 Our Business

Inland Rail is one of the largest infrastructure projects in Australia that is transforming how freight moves across the country, creating economic opportunities and supporting regional communities. Spanning 1,600 kilometres from Victoria to Queensland, it is building a more connected, reliable and efficient national freight network.

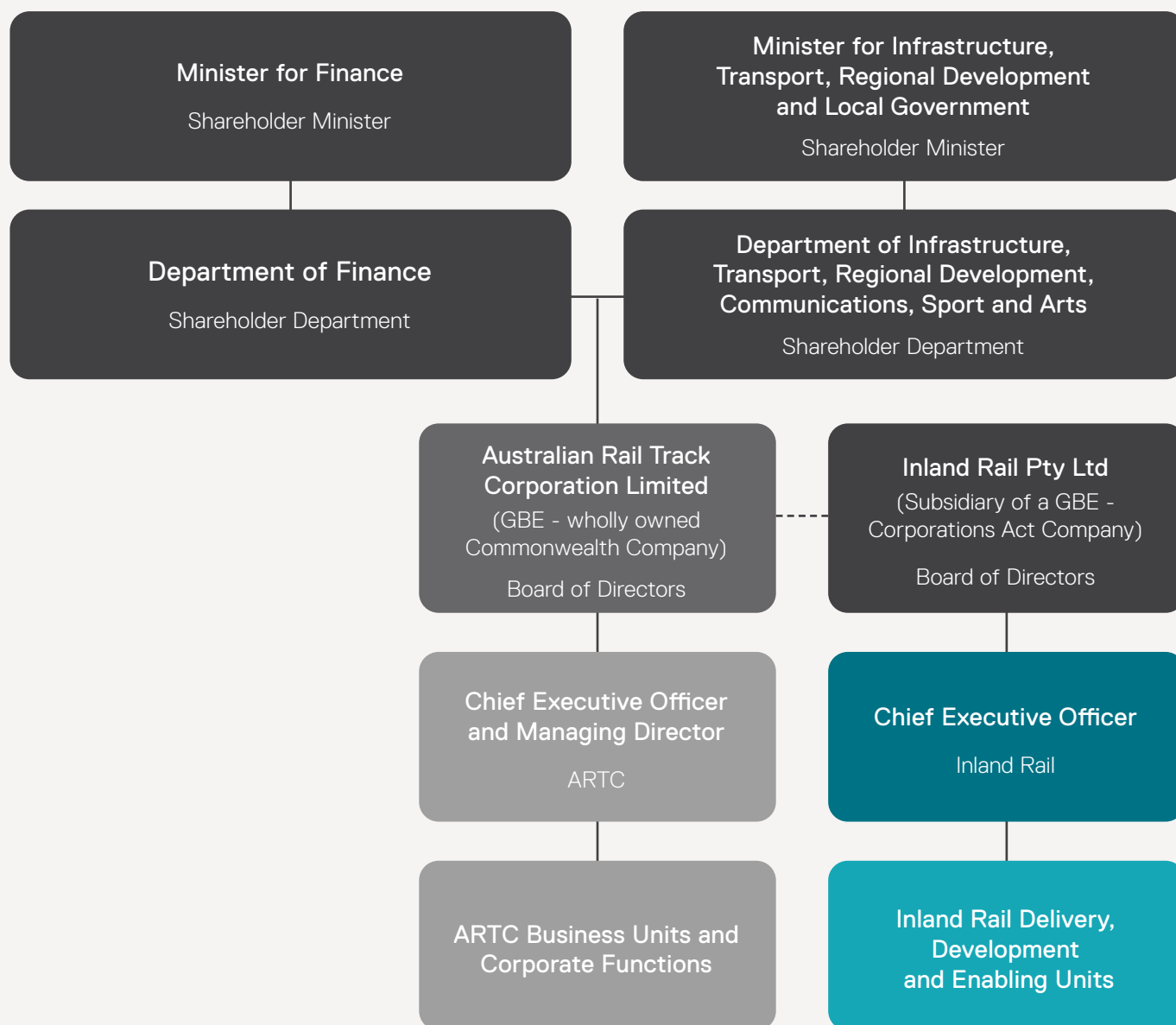
As a subsidiary of ARTC, we are responsible for the planning and delivery of Inland Rail on behalf of the Australian Government. The project is being delivered in 12 sections, involving upgrades or enhancement works to approximately 1,000km of existing track and construction of 600km of new track. Some sections are already operational, others are in the construction or planning stages.

As each section of the Inland Rail project is completed, it is handed back to ARTC to manage and operate within ARTC's interstate rail network.

3.2 Our Structure

We are governed by a Board of Directors approved by our Shareholder Ministers, represented by the Minister for Infrastructure, Transport, Regional Development and Local Government and the Minister for Finance as outlined in **Figure 1** below.

Figure 1: Inland Rail Pty Ltd Structure



Inland Rail has two committees under the Board of Directors, with each Committee governed by its own Charter, detailing the Committee's role, membership requirements and duties. This is reviewed periodically and revised when appropriate.

3.3 Our Operations and People

We are located across Brisbane, Sydney and Melbourne, with regional offices in Toowoomba, Goondiwindi, Narrabri, Narromine, Parkes, Wagga Wagga and Albury.

Our operations span across three states, as highlighted on the Inland Rail Project Alignment map in **Figure 2** below.

Figure 2: Map of the Inland Rail Project Alignment



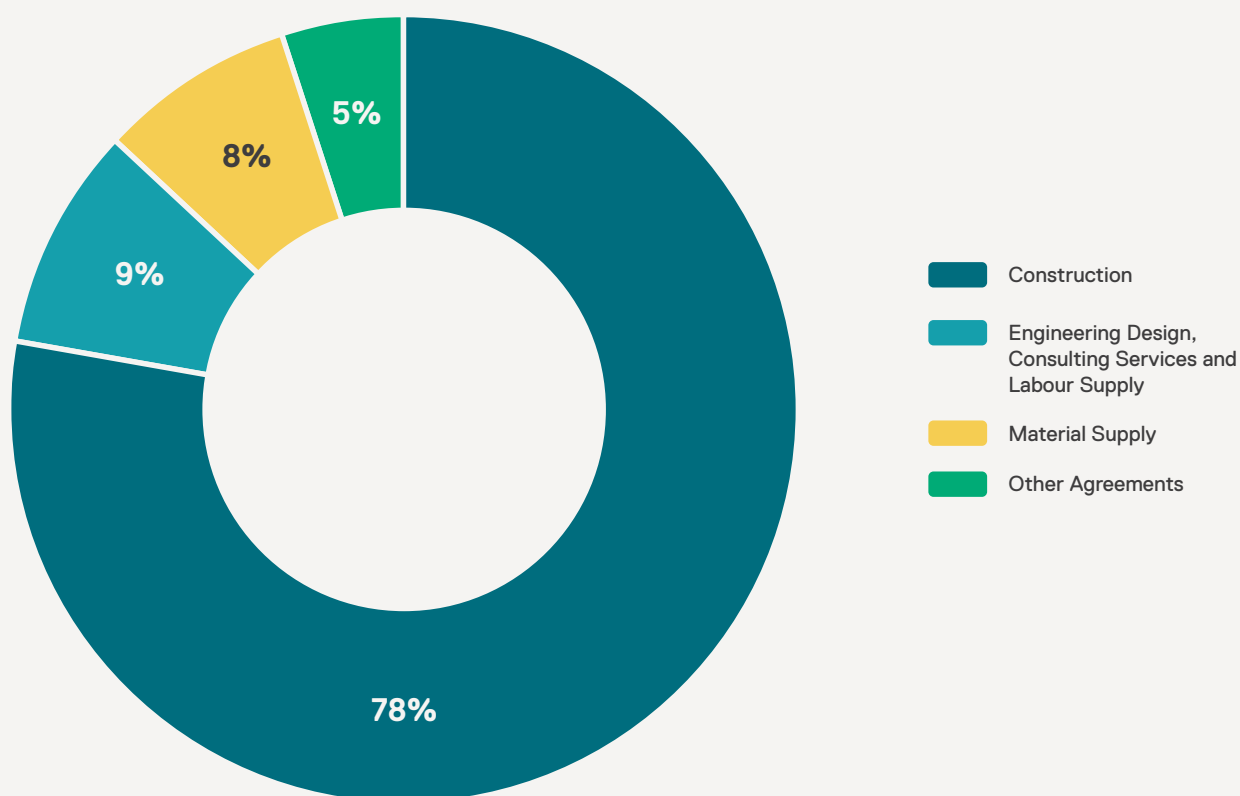
3.4 Our Supply Chain

Our supply chain activities include the acquisition of goods and services to enable the delivery of the Inland Rail project. These include:

- major construction packages awarded to principal construction contractors
- materials supply for construction, particularly domestically produced rail and sleepers
- consulting and labour services, predominantly related to environmental and planning approvals, engineering design and property acquisition services
- a myriad of relatively minor goods and services that precede principal construction contracts and that otherwise support our operations.

This is demonstrated in **Figure 3** below which highlights the types of contracts procured by Inland Rail.

Figure 3: % Spend by Contract Type in Our Supply Chain



Our direct procurement activities occur almost exclusively within Australia and with Australian entities, reflecting our commitment to the Australian Industry Participation policy.



Our Modern Slavery Risks

We recognise the scale and complexity of modern slavery as a global issue, and we acknowledge our role in actively addressing and removing risks of modern slavery in our operations and supply chain.

4.1 Risks in Our Operations

The nature of Inland Rail's geographically dispersed delivery program requires directly employed highly skilled workforce across the Australian Eastern seaboard. As of July 2025, some key statistics of our workforce include:

- 492 people are employed by Inland Rail, with 85% of our workforce employed under Enterprise Agreements and the balance employed under Individual Agreements
- All employees are located in Australia

- 97.4% of our employees work on an ongoing basis and 2.6% on a fixed term basis
- 95% are full time employees, 5% work part time with 11% (across both full and part time workers) having a formal flexible work arrangement
- 44.5% of our employees are female, 55.4% are male and 0.1% are non-binary, intersex or unspecified
- 3.05% of our employees are First Nations Peoples.

Based on the nature of Inland Rail's directly employed workforce as outlined above and our human resources policies, systems and procedures (refer to Section 5.1.1 for further detail), we have assessed our operations as low risk for modern slavery.

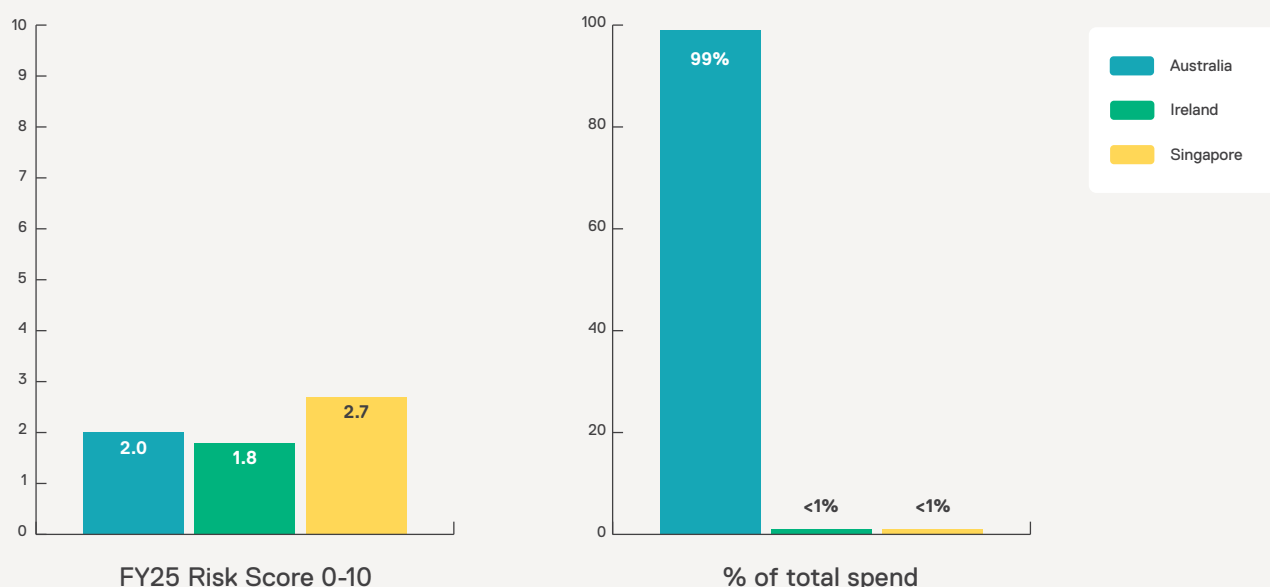
4.2 Risks in Our Supply Chain

In addition to our directly employed workforce, we engage with a large number of indirect workers through our principal construction contractors, subcontractors, suppliers and labour hire agencies.

Inland Rail, in conjunction with ARTC, conducts an annual supplier risk assessment of our supply chain to identify areas of exposure to higher risk of modern slavery.

Utilising this supplier risk model, we have assessed our supply chain and determined that 99% of the suppliers we contract with directly are located in Australia, with the geographic risk assessment for internationally sourced contracts presented in **Figure 4**.

Figure 4: Inland Rail Geographic Risk for International Contracts



**Geographic risk assessed using modern slavery assessment tool developed for ARTC.*

Risk Score explanation 0 = low, 10 = high



Actions Taken

During Inland Rail's first reporting period (FY25), we made significant progress to address modern slavery risks associated with our operations and supply chain.

5.1 Actions in Our Operations

We are committed to active risk management and have a strong culture in identifying and escalating concerns to the appropriate decision maker. Inland Rail's risk governance and management framework ensures there are clearly documented and fit-for-purpose management guidelines that support the consistent application of risk management, including specific management strategies applied for identifying, evaluating and managing risks.

5.1.1 Policies and Procedures

As a recently established subsidiary, we have developed and implemented policies and procedures to ensure our responsibilities on modern slavery are comprehensively planned, implemented and managed throughout our operations. These are outlined further below.

Code of Conduct

Inland Rail's Code of Conduct was launched during the reporting period, including committing to respecting human rights and preventing modern slavery. Our Code of Conduct recognises the importance of integrity and ethical behaviour, and outlines principles of conduct and behaviour required from our employees, contractors and consultants.

Whistleblowing

Our Whistleblowing Policy sets out the process for reporting and dealing with improper conduct. We are committed to preventing victimisation as a result of a protected disclosure.

Procurement

We have a Procurement Policy and documented processes which address modern slavery requirements including:

- Compulsory principles for the procurement of goods and services for Inland Rail. These principles include:
 - Value for money
 - Efficient and effective competition
 - Transparency
 - Confidentiality
 - Ethical behaviour
 - Probity
 - Financial controls
 - Providing reasonable opportunity for participation in employment opportunities and employment from local, regional and Indigenous suppliers
- Vendor registration and supplier prequalification processes
- Our standard contract terms and conditions addressing modern slavery.

People & Culture

Inland Rail has a comprehensive and transparent talent acquisition procedure which outlines how we attract, select and appoint the most suitable candidates. It aims to deliver transparency, consistency, fairness, timeliness and the best outcome for Inland Rail and candidates.

This includes undertaking relevant pre-employment checks to reduce the risk of human trafficking and undocumented workers. Our enterprise agreements and employment contracts are reviewed against Fair Work legislation which reduces the risk of unfair employment practices.

In addition to the above, Inland Rail focuses on creating a positive and safe workplace culture which reduces the risk of mistreating workers. **Figure 5** provides an overview of actions during FY25.

Figure 5: Our Actions Taken During FY25

Area	Actions during FY25
 Inclusion and Diversity	- Established an Inclusion and Diversity Committee which serves as an internal advisory board and strategic enabler, playing a pivotal role in promoting a workplace culture that is inclusive, equitable and diverse. - Undertook gender pay/equity analysis to inform gender pay/equity strategies.
 First Nations Employment	Focused on First Nations employment, with 3.05% achieved during the reporting period.
 Wellbeing and Engagement	- Maintained a comprehensive Employee Assistance Program (EAP) which provides a range of support services to suit individual needs. - Undertook two employee engagement surveys, with overall employee engagement increasing from 59% to 65% during the reporting period. - Undertook a People at Work survey to understand psychosocial risks in the organisation and to identify factors that may cause harm to our workers' psychological health and safety.
 Policies and Procedures	- Developed and implemented a comprehensive suite of policies to support our diverse workforce and culture for us as a standalone subsidiary of ARTC, including: - Code of Conduct - Diverse, Respectful and Inclusive Workplace Policy - Workplace Relations Policy - Conflict of Interest and Gifts and Benefits Policy - Anti-Bribery and Corruption Policy - Work Health and Safety Procedure - Prevention and Response to Sexual Harassment and Sex-Based Discrimination Procedure - Flexible Working Guideline - Whistleblower Policy

5.1.2 Training and Awareness

We support our employees, contractors and consultants to understand our focus on modern slavery risk management, including through targeted training and awareness. During FY25, we delivered:

- **Mandatory Induction Module** on our Code of Conduct, including awareness training of modern slavery risks
- **Compulsory Introduction to Code of Conduct** for existing employees including awareness training of modern slavery risks.

5.2 Actions in Our Supply Chain

5.2.1 Supplier Risk Assessment

Specific modern slavery risks in our supply chain were assessed through an annual risk assessment process facilitated by ARTC to identify modern slavery risk areas based on geography, industry sub sectors, suppliers' own policies and protocols and levels of spend with suppliers. The supplier risk assessments were conducted on over 400 directly engaged Inland Rail suppliers.

Within our procurement activities, we have additionally:

- Undertaken an analysis of FY24 supplier data within the existing (ARTC) Modern Slavery Risk Register to establish a benchmark
- Developed the FY25 Modern Slavery Risk Register complemented by 25 supplier questionnaires for additional scoring in the Risk Register
- Analysed the principal construction contractor's business-wide Modern Slavery Statements
- Reviewed Tier 2 data provided by our principal construction contractors which ascertained that 100% of their direct supply chain working on the Inland Rail project are located within Australia
- Commenced engagement with our principal construction contractors to explore methods of collaboration for specific scrutiny of their supply chains that are involved in the delivery of the Inland Rail project.

5.2.2 Industry Collaboration

We are committed to implementing the Australian Industry Participation policy and have an approved Australian Industry Plan with the Department of Industry Science and Resources to promote the opportunities of the Inland Rail project to Australian businesses. This has resulted in the large proportion of contracts awarded to Australian businesses.



Assessing Effectiveness

Inland Rail monitors the effectiveness of processes and procedures to address modern slavery risks, including by actively engaging and consulting with ARTC as our parent company.

We will continue to evolve the assessment of effectiveness through:

- incorporating modern slavery risks into our assurance framework and whistleblowing service
- conducting a review of training and awareness of modern slavery risks for our employees
- enhancing our policies and procedures to increase the awareness, prevention, detection and response to modern slavery issues across the organisation.



Looking Ahead

We are committed to regularly reviewing our modern slavery risk management and compliance activities and adopting a continuous improvement approach.

During the next reporting period, we plan to continue to strengthen our approach to identifying, mitigating and managing modern slavery risks through:

Our Operations:

- Expanding our leadership and functional team understanding of modern slavery risks through awareness training on modern slavery risks
- Incorporating learnings from ARTC and across the Australasian Rail Association (ARA) Modern Slavery Network to enhance our procurement and contract management policies and procedures to continuously improve modern slavery risk management.

Our Supply Chain:

- Extending the supplier risk model to enhance analysis of Inland Rail's modern slavery risks within the supply chains of our Tier 1 principal construction contractors
- Engaging with our principal construction contractors to ensure modern slavery risks are managed in the delivery of the Inland Rail project.



Approval

This statement is made pursuant to the *Australian Modern Slavery Act 2018 (Cth)* and has been approved by the IRPL Board of Directors.



Appendix A

Mandatory Criteria Checklist

Reference in Modern Slavery Act 2018 (Cth)	Description	Location in this Statement
s. 13(2)c	Is approved by the principal governing body of the entity.	Section 8: Approval
s. 13(2)d	Is signed by a responsible member of the entity.	Section 2: About this Statement
s. 16(1)(a)	Identify the reporting entity.	Section 2: About this Statement
s. 16(1)(b)	Describe the structure, operations, and supply chains of the reporting entity.	Section 3: About Inland Rail Pty Ltd
s. 16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Section 3: Our Modern Slavery Risks
s. 16(1)(d)	Describe the Actions taken by the reporting entity, and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Section 5: Actions Taken
s. 16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions.	Section 6: Assessing Effectiveness

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