



**2024
Modern Slavery
Statement**

Disclaimer

Whilst Aurizon has endeavoured to ensure the accuracy of the information contained in this document at the date of publication, it is general in nature and does not purport to be complete or error free. Any information in this document is subject to change without notice. Except as required by applicable regulations or law, Aurizon is not under any obligation to review or update this document to reflect events or circumstances that arise after publication.

Acknowledgement of Country

We acknowledge the Traditional Custodians of this land and pay our respects to the Elders past, present and future, for they hold the memories, the traditions, the culture and hopes of Aboriginal Australia. We must always remember that under the ballast, sleepers, rail systems and office buildings where Aurizon does business, the land was and always will be traditional Aboriginal land.

Contents

Introduction	4
Our business	6
Risks of modern slavery in our supply chain and operations	11
Actions taken to assess and address the risks of modern slavery	13
Assessing the effectiveness of our actions	18
Our year ahead	19
Appendix 1	20



Aurizon is committed to supporting and respecting the protection of internationally proclaimed human rights.

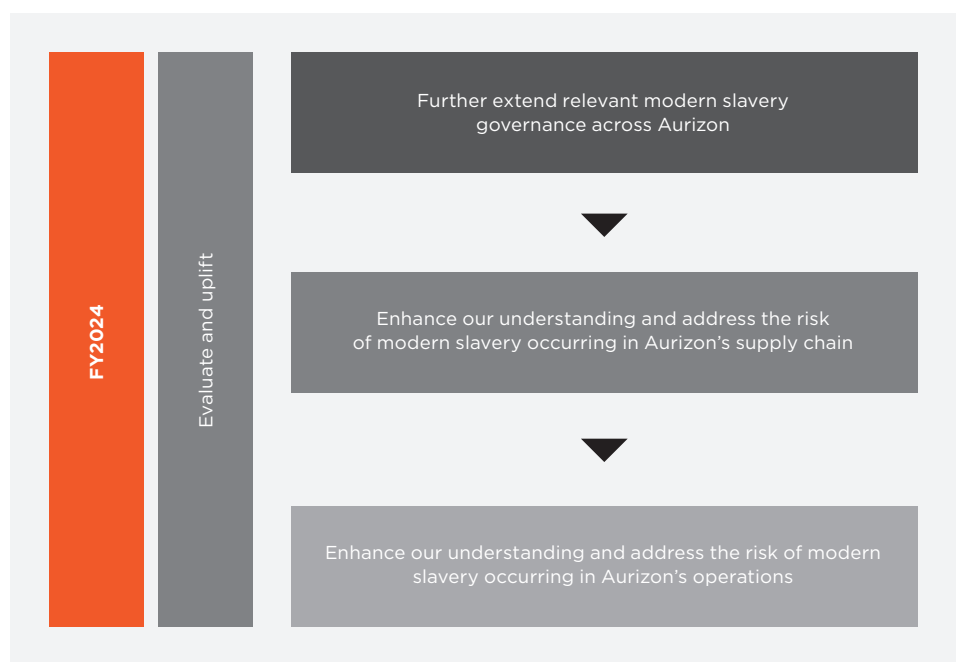
Introduction

As Australia's largest rail freight operator, Aurizon is committed to supporting and respecting the protection of internationally proclaimed human rights, laws and standards. We uphold this commitment through Aurizon's Values and Code of Conduct, our firm commitment to safety, lawful and ethical conduct, and respect for others, and by responsibly considering the community and environment in decision-making.

Our focus in FY2024

During FY2023, a new three-year roadmap was developed to drive our continuous improvement journey. The focus of our actions in FY2024 has been to evaluate and uplift our maturity. Initiatives undertaken this year are detailed in the 'Actions taken to assess and address the risks of modern slavery' section of this modern slavery statement.

Figure 1 FY2024 Modern Slavery Roadmap Initiatives



This is our fifth statement, made pursuant to the *Modern Slavery Act 2018 (Cth)* (the Act).

It reports on the risks of modern slavery in Aurizon's operations and supply chains, the actions taken to identify and address those risks during the financial year ended 30 June 2024, and how we will continue to assess the effectiveness of our actions.

Figure 2 Key achievements**Table 1** Mandatory criteria

Mandatory criteria	Section in statement	Page
1. Identify the reporting entity.	Our business	6
2. Describe the reporting entity's structure, operations and supply chains.	Our business – Our structure, Our operations, Our people, Our supply chain	6 to 10
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks of modern slavery in our supply chain and operations	11 to 12
4. 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.	Actions taken to assess and address the risks of modern slavery	13 to 17
5. Describe how the reporting entity assesses the effectiveness of these actions.	Assessing the effectiveness of our actions	18
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Our business – process of consultation with reporting entities	6

Aurizon (ASX: AZJ) is Australia's largest rail-based transport business.

Our business

Our structure

This joint statement is made by Aurizon Holdings Limited ACN 146 335 622, a company headquartered in Queensland, and entities it owns or controls that are reporting entities for the purposes of the Act. These entities, and the entities that those reporting entities own or control (collectively, the Aurizon Group), are identified in Appendix 1: Aurizon Holdings Limited group structure. Using largely centralised functions, policies and procedures, the Aurizon Group operates in an integrated manner, governed by the Aurizon Holdings Executive Committee and Board of Directors (the principal governing body of the parent entity of the Aurizon Group) who oversee operations and risk in each subsidiary entity of the Aurizon Group. References to 'Aurizon', 'we' or 'our' in this joint statement are references to the entities making up the Aurizon Group.

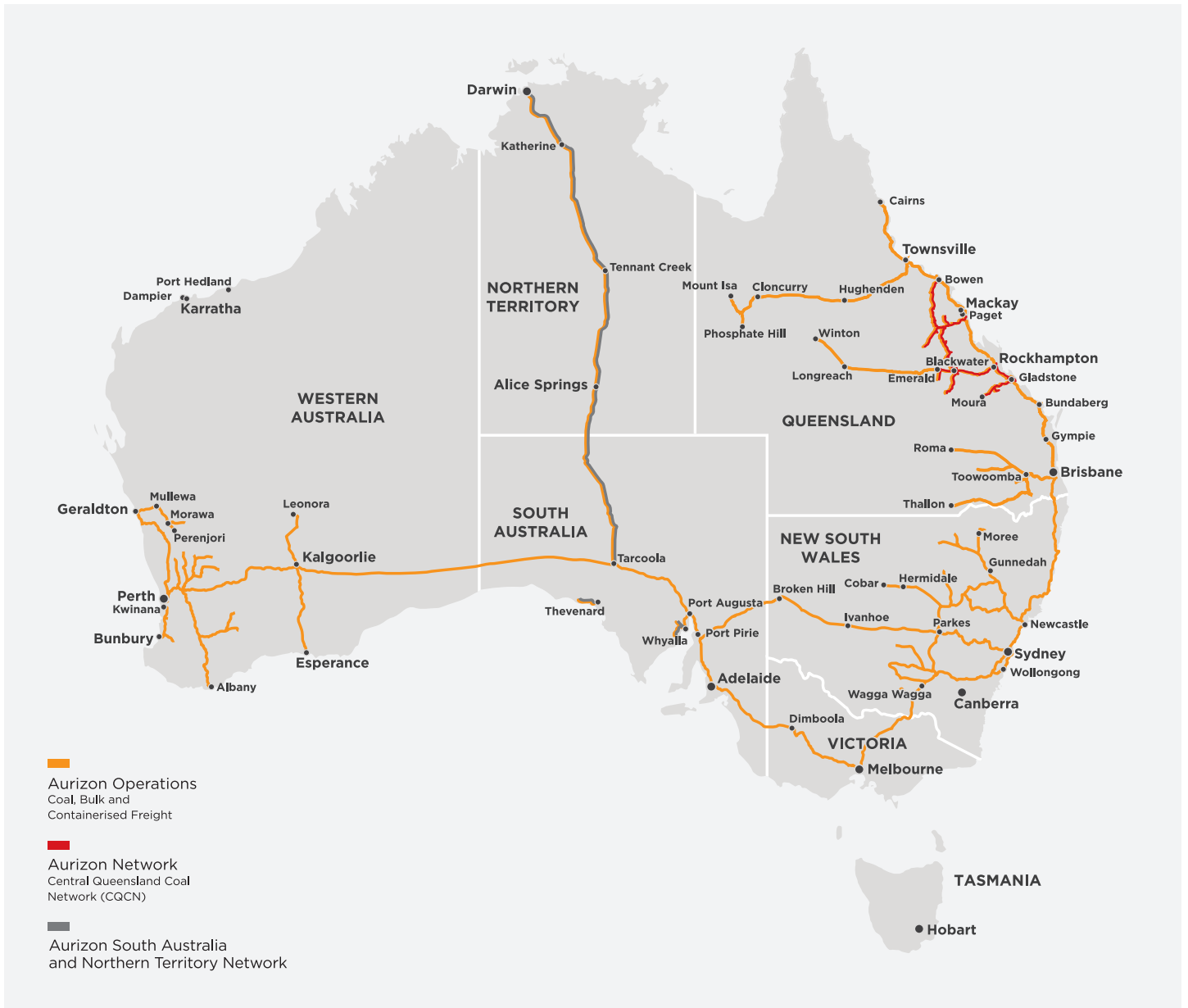
Process of consultation with reporting entities

Due to the integrated nature of our operations, we take an enterprise-wide approach to our modern slavery response. Accordingly, our Modern Slavery Statement has been prepared in consultation with stakeholders across the Aurizon Group, including Procurement, Corporate Affairs, People & Development, Legal, and Governance, Risk & Assurance. This statement has also been prepared through a process of consultation with the Aurizon Holdings Executive Committee and Board of Directors (the principal governing body of the parent entity of the Aurizon Group), as well as Aurizon Modern Slavery Working Group. Consultation has occurred with representatives (being executives and the Board of Directors) of reporting entities in relation to the development of this statement. The Aurizon Holdings Executive Committee has endorsed this statement, and the Board of Directors has approved it.

Figure 3 Aurizon's FY2024 summary



Figure 4 Aurizon's operations



Our operations

Our key operational areas are broken into Operations (Coal, Bulk, Containerised Freight), and Network.

Operations

Our Coal business provides a critical service to Australia's \$91 billion¹ export coal industry, the nation's second largest source of export revenue in FY2024. Aurizon has the largest rail fleet in Australia and is the only operator with services to all nine coal export ports on Australia's east coast. The Bulk business delivers full supply chain solutions, including haulage, terminal storage and handling and stevedoring for commodities such as iron ore, bauxite,

alumina, and grain. Following on from the acquisition of One Rail Australia in July 2022, the Bulk business includes 2,460 kilometres of track infrastructure in South Australia and the Northern Territory.

Our Containerised Freight business provides rail linehaul services for customers in the interstate freight market. This includes the transport of vital supplies such as retail and supermarket goods, vehicles, machinery and equipment. Building upon this national network (and Bulk Central below-rail infrastructure), a land-bridging opportunity is being

developed to deliver freight from the Port of Darwin to major cities via rail.

Network

We hold the long-term lease and operate the Central Queensland Coal Network (CQCN), a critical piece of infrastructure supporting about 90% of Australian steel-making coal export volume. The CQCN connects over 40 mines to five export terminals, as well as to domestic customers. This 2,670 kilometre multi-user track network comprises four major coal systems: Newlands, Goonyella, Blackwater and Moura.

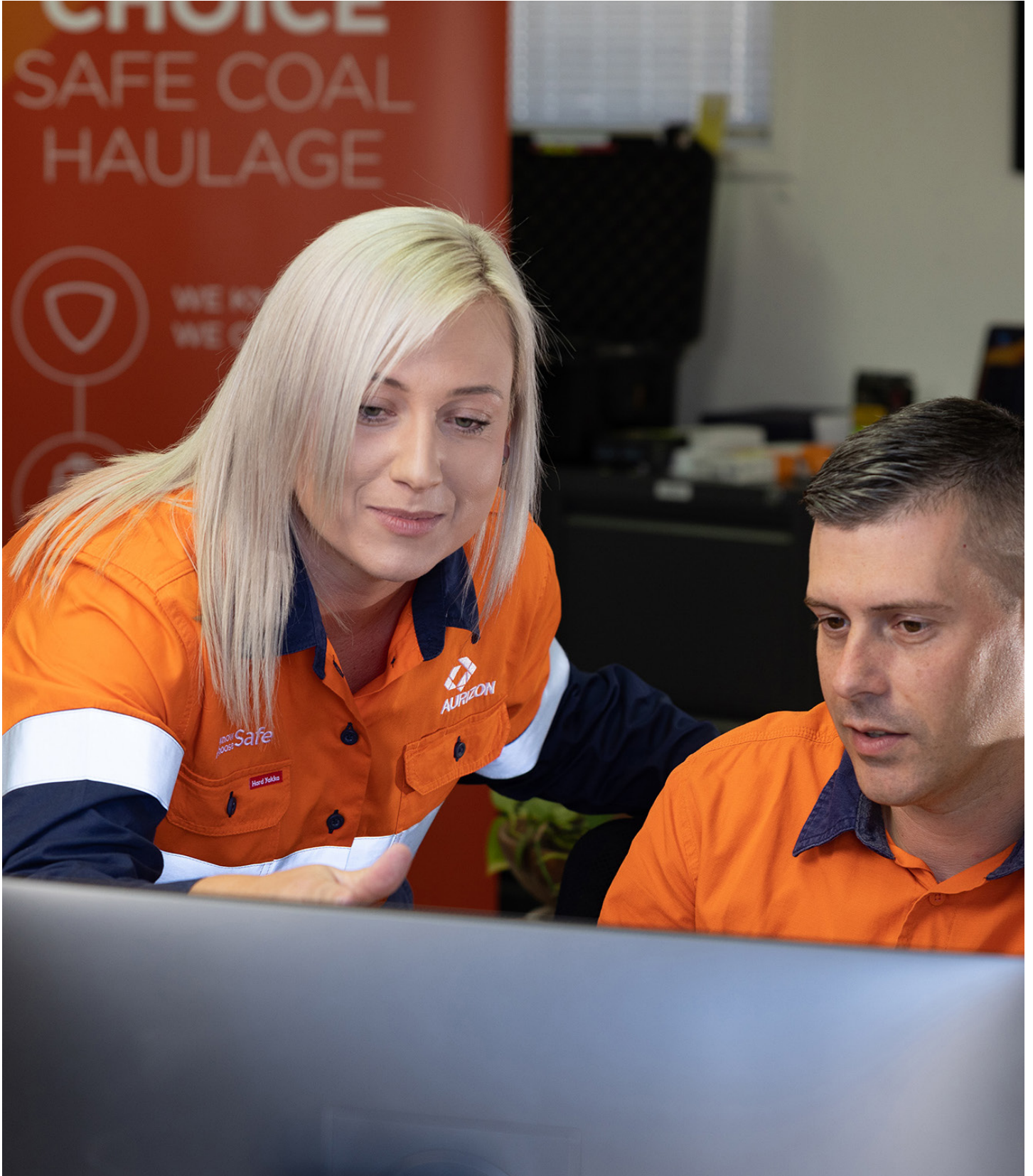
1 Australian Bureau of Statistics

Our people

At Aurizon, our people are our greatest asset. We have over 6,100 employees, with the vast majority living and working in

regional Australia. Our purpose – growing regional Australia by delivering bulk commodities to the world – is underpinned by a workplace culture of connection to enable great outcomes. Through our

commitment to safe and efficient delivery for our customers, we are building our workforce for the future. This includes investing in our people and partnerships and creating an inclusive workplace.



Our supply chain

Aurizon's supply chain is complex and multi-tiered. Our tier 1 suppliers are those we engage directly, while our tier 2 and beyond suppliers are those who provide our tier 1 suppliers with goods or services.

Table 2 Tier 1 suppliers

Continent	Australia	Asia	Europe	North America	Oceania
Spend %	95.7%	3.5%	0.5%	0.2%	0.04%

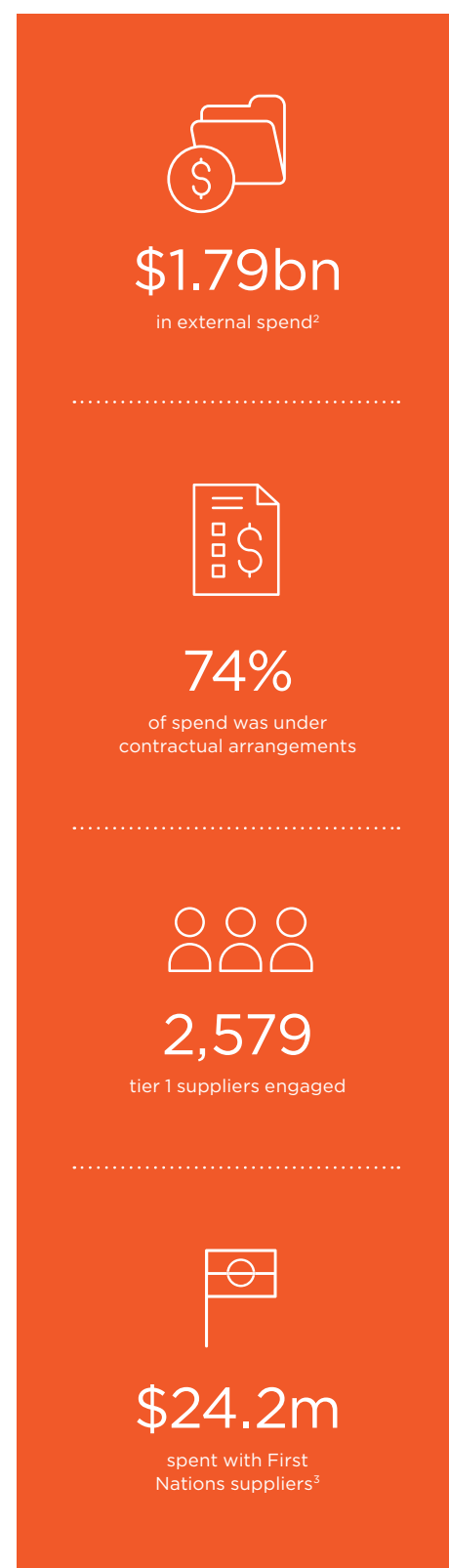
Table 2 identifies the location of our tier 1 suppliers, by spend percentage. We recognise that this might not be indicative of the original source location of the products or services procured. The need for our supply chains to be more transparent is discussed below in 'Tier 2 and beyond suppliers'. Table 3 details the five largest categories of direct external spend incurred across our operations.

Table 3 Five largest spend categories for FY2024

Category	% External spend	Sourcing locations ⁴	Tier 1 suppliers
1. Rollingstock equipment & services			
Assets, parts, and maintenance services, which comprises purchasing and servicing of one of Aurizon's key asset groups.	20%	Australia, Canada, China, Hong Kong, Italy, Ireland, USA, New Zealand	763
2. Fuel			
Lubricant and fuel used in our locomotives and equipment.	19%	Australia, Switzerland	91
3. Construction and maintenance services			
Services to support the maintenance of our rail infrastructure, i.e. civil construction and electrical infrastructure.	8.6%	Australia, Singapore, UK	208
4. Facilities management			
A range of services to support our real estate portfolio, including managed services, cleaning, waste, and trade services.	5.7%	Australia	324
5. Information, communication and technology			
Our technology architecture of hardware, infrastructure, services, software, and telecommunications.	5.6%	Australia, Singapore, India, various European countries, USA, Israel, New Zealand.	271

Note: FY2024 spend categories are closely aligned to FY2022 spend categories. The inclusion of Energy in FY2023 was due to an increase in market energy pricing.

Figure 5 Aurizon's FY2024 performance



² Excludes government charges, access fees, etc.

³ Tier 1 & Tier 2 Supply Nation-verified Indigenous businesses.

⁴ Source location is determined by the domicile of the legal entity.

Tier 2 suppliers

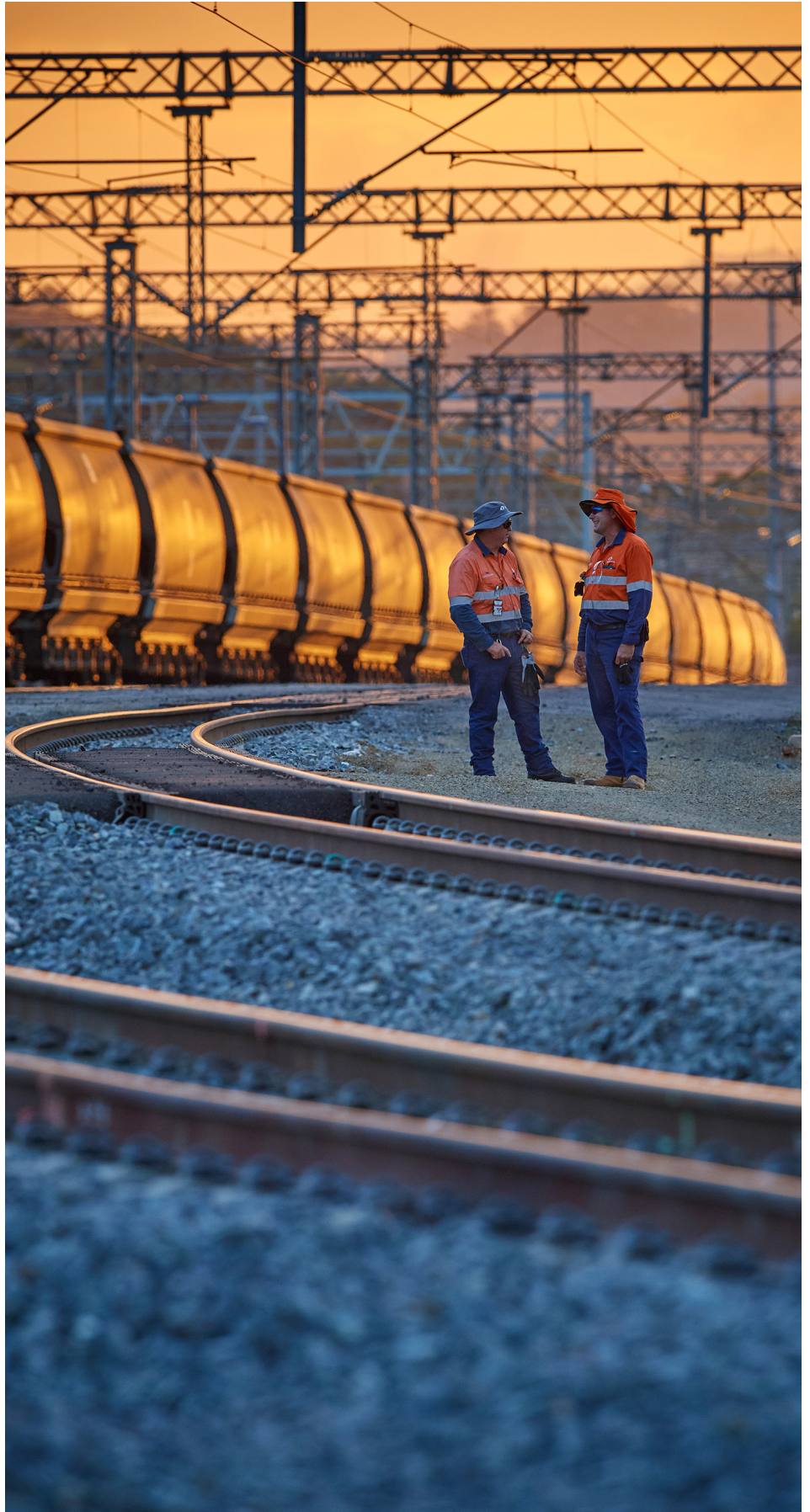
Supply chains – including Aurizon’s – are complex, multi-tiered logistics systems. Due to these complexities, we acknowledge that we do not have the same level of understanding of our suppliers in tier 2 and beyond as we do for our tier 1 suppliers.

Having more transparent supply chains means working in collaboration with our tier 1 suppliers to better understand our risks. We continue to look for innovative ways to improve our understanding, in addition to our general due diligence. This includes the use of our third-party risk assessment platform and supply chain visibility activities.

Our local procurement

Given the regional footprint of our business, we recognise the importance of contributing as partners in the communities in which we operate. An important aspect of our local procurement is our engagement with First Nations suppliers⁵. Working with these suppliers is one way that we help to advance the socio-economic opportunities of the communities in which we operate.

In FY2024, of our tier 1 spend with these suppliers, 91% was within construction and maintenance services (primarily civil infrastructure services) and asset renewals (primarily track infrastructure services) categories.



⁵ Supply Nation-verified Indigenous businesses.

Our Modern Slavery and Human Rights Due Diligence Framework is key to identifying and managing our modern slavery risks.

Risks of modern slavery in our supply chain and operations

Our governance and due diligence processes

Our Modern Slavery and Human Rights Due Diligence Framework (Modern Slavery Framework) aligns with the United Nations Guiding Principles on Business and Human Rights.

The framework is supported by various standards and procedures that govern our approach to conducting business, with many reported in detail in our previous modern slavery statements.

Key documents include:

- Human Rights Policy
- Whistleblower Policy
- Aurizon Code of Conduct; Supplier Code of Conduct
- Procurement Commitment; People Commitment; Governance, Risk and Assurance Commitment
- Enterprise Risk Management Framework.

In FY2024, we completed a review of our Modern Slavery Framework documentation and implemented a new risk assessment tool, in line with our commitments made in our FY2023 Modern Slavery Statement.

Further details of these two actions are provided in the 'Actions taken in our operations' section.

While this review was underway, we continued our due diligence activities in line with our existing Modern Slavery Framework and associated procedures, using our new risk assessment tool.

Key elements of our due diligence include:

- **Risk assessment tool (third-party risk assessment platform)**, to support the risk monitoring and assessment of our suppliers.
- **Supplier Assessment Questionnaires (SAQs)**, to help us measure a supplier's maturity in relation to human rights and to understand supply chain visibility.
- **Modern Slavery Decision Framework**, to provide guidance on the appropriate response to a potential modern slavery risk or an identified incident of modern slavery.
- **Two-way dialogue and collaboration** with our suppliers, to support successful engagement, knowledge sharing and risk mitigation.

Modern slavery risks in our supply chain

Tier 1 suppliers

We understand that risk is dynamic, therefore we use our third-party risk assessment platform to help monitor our suppliers and associated risks.

An assessment of our active tier 1 suppliers identified two key categories where there was a potential for us to contribute to or be directly linked to modern slavery:

1. **Rollingstock equipment** – risk of forced labour and human trafficking due to long, complex and non-transparent supply chains, and

geographical risks based on the country of origin.

2. **Plant and equipment** – risk of forced labour and human trafficking due to characteristics of complex supply chains and reliance on low-skilled labour/products from countries with lower labour standards or limited enforcement capacity.

During FY2023, Aurizon had identified 13 high-risk suppliers. The FY2024 review identified two very high and four high-risk suppliers who are active in Aurizon's systems⁶. These ratings are determined by a combination of country and industry risk within our third-party risk assessment platform.

The adjustment in supplier numbers from FY2023 to FY2024 is due to the change in Aurizon's third-party risk assessment tool, resulting in:

- change to risk rating methodology
- integration of supplier data management processes
- refined alignment with Aurizon's purchasing system.

Further details are provided in the 'Actions taken in our supply chain' section.

All but one of these suppliers fall within our two highest risk categories – rollingstock equipment, and plant and equipment. The remaining supplier is in the IT services category. All six suppliers have either been sent an SAQ request via the platform in FY2024 or completed a site audit in recent years.

Tier 2 and beyond suppliers

Over the last two reporting periods, we have taken varying approaches to improve our understanding of our supply chain, from trade data reviews of rollingstock equipment sub-suppliers (FY2022) to modern slavery statement reviews of major suppliers (FY2023).

During FY2024, we approached a select number of critical tier 1 suppliers within

our high-risk rollingstock equipment category to undertake supply chain mapping workshops.

Due to the complex nature of these supply chains, these meetings were an effective way to gain insightful information on our supply chain. Further details of this action are provided in the 'Actions taken in our supply chain' section.

Modern slavery risks in our operations

We acknowledge that modern slavery risks can be found anywhere; they are not confined to specific countries or regions. Therefore, as an Australian-operated entity, it is still important that we review practices in our operations for indicators that have the potential to cause, or contribute to, modern slavery⁷.

Table 4 Risks in operations

Risk area	Potential risk	Controls
<p>Direct workforce</p>	<p><i>Cause modern slavery where our actions or omissions directly result in modern slavery harm occurring.</i></p> <p><i>Aurizon could cause modern slavery, including if Aurizon subjected workers to exploitative conditions that meet the threshold for modern slavery.</i></p>	<p>Corporate Governance Framework – designed to promote responsible management and conduct of Aurizon.</p> <p>Development programs – targeted leadership programs, support programs for recent graduates and those transitioning to the rail industry. 455 people participated in program initiatives in FY2024.</p> <p>Enterprise agreements/contracts – Aurizon’s direct workforce is covered by individual employment contracts, modern awards and enterprise agreements, which contain at least minimum pay and entitlements.</p> <p>Recruitment and onboarding processes – procedures in place to ensure that recruitment and appointment practices are fair and aim to achieve the objective of equal opportunity in accordance with Aurizon’s Inclusion & Diversity Policy.</p> <p>Employee grievance mechanism – the Employee Grievance Procedure details the principles, process and accountabilities for resolving employee grievances.</p>
<p>Indirect workforce</p>	<p><i>Contribute to modern slavery, where our actions or omissions significantly incentivise, enable, or facilitate modern slavery harm occurring.</i></p> <p><i>Aurizon could contribute to modern slavery, including if Aurizon’s suppliers engaged low-skilled labour to provide IT services, cleaning or facilities management services, and these workers were exploited.</i></p>	<p>Supply Chain due diligence – monitoring via our third-party risk assessment platform, supplier audit and SAQs.</p> <p>Contract clauses and our Supplier Code of Conduct – detailed further in “Actions taken in our supply chain.”</p>

The controls outlined above provide Aurizon with the tools to support the identification of potential modern slavery risks in our operations, ensuring we can assess and address those risks as they may arise.

During FY2024, we completed Supplier Assessment Questionnaires (SAQs) on behalf of the Aurizon Group, which resulted in the overall risk score of ‘very low’. Further information on this action is detailed in the ‘Actions taken in our operations’ section.

Considering these safeguards and assessment results, we have concluded that the likelihood of Aurizon causing or contributing to modern slavery in our operations continues to be low.

⁷ United Nations Guiding Principles on Business and Human Rights.

In line with our updated three-year plan, our focus in FY2024 has been to evaluate and uplift relevant modern slavery governance across Aurizon.

Actions taken to assess and address the risks of modern slavery

Actions taken in our supply chain

Acknowledging that we need a sustainable, long-term plan to manage risks in our supply chain, we continue to take a targeted and staged approach to address this issue.

Key actions completed during FY2024 on our supply chain include the following:

Implement modern slavery risk assessment tools

New tool developed: We made the decision to transition to a new risk management tool to assess modern slavery and human rights risks.

Implemented in FY2024, our new third-party risk assessment platform assesses supplier risk based on industry and country of operation against international indexes (for example, the Global Slavery Index) and other international databases to provide each supplier with an overall risk rating.

Supplier risk review: In implementing the platform, we reassessed the risk ratings of all of our suppliers (outlined above in 'Modern slavery risks in our supply chain' section). This resulted in two very high risk and 10 high-risk supplier ratings. After assessing each supplier and their engagement/purchasing history, we verified that six high-risk suppliers had not been used for an extended period of time. Therefore, they were deactivated in our purchasing system (with purchasing blocks applied). If these suppliers are engaged again, they must complete Aurizon's full onboarding process again.

Customised SAQs: In addition, we continue to send Supplier Assessment Questionnaires (SAQs) to our suppliers in line with our Modern Slavery

Framework. The customised SAQs have been developed to help us target key areas in which we feel it is important to understand our suppliers and their maturity in relation to managing modern slavery risks. This includes approach to managing risks, governance, oversight and supply chain visibility, and human resources elements (recruitment, training, and worker dialogue).

In creating these SAQs, we have identified various critical questions to help identify potential modern slavery risks. These questions relate to key risk indicators (for example, freedom of association, access to grievance mechanisms, and ability to resign without penalty) and trigger due diligence activities in line with our Modern Slavery Framework.

Media alerts: Forming part of this implementation was the integration of adverse media alerts. The alerts in our third-party risk assessment platform are managed at a supplier level and screened daily. Due diligence on media alerts is undertaken in line with our Modern Slavery Framework and supporting procedures.

Process integration: Additional steps were also integrated into our existing supplier onboarding process to support integrity of our third-party risk assessment platform data.

In our FY2023 Modern Slavery Statement, we committed to refining our modern slavery supply chain risk management policies and procedures. Please refer to the 'Actions taken in our operations' section for details relating to this action.

Supply chain transparency (tier 2)

In FY2024, we worked with five critical (tier 1) suppliers to better understand their supply chains through supply chain

mapping workshops. These suppliers, within our Rollingstock category, provide Aurizon with rollingstock (locomotive and wagon) components and services.

These workshops proved valuable to Aurizon and our suppliers, providing a better understanding of the geographical location of our tier 2 suppliers who contribute to the supply chains of key equipment we need to deliver services to our customers. After the workshops, our supplier participants gave some positive feedback: they appreciated the format used to approach the mapping exercise – understanding the intended use of the information made it easier to complete the supply chain mapping. We used the information obtained through these workshops in conjunction with our third-party risk assessment platform to analyse the risk level based on geographic location and industry of the suppliers. The findings from this review are presented in Table 5.

Table 5 Tier 2 findings

Predominant supplier locations	USA 64%	Risk level: Low	Key potential modern slavery risks: Forced labour and forced marriage ⁸
	Australia 33%	Risk level: Very low	Key potential modern slavery risks: Forced labour and forced marriage ⁸
Predominant supplier industry	Machinery	Risk level: Very high Key risk indicators: Complex supply chains, low-skilled labour	Key potential modern slavery risks: Forced labour and slavery

Based on the information available to us and the guidance of the Global Slavery Index 2023, our third-party risk assessment platform, Supplier SAQs, and site audit reports, we concluded that there is a medium risk of modern slavery with these tier 2 suppliers. We will continue to work with our suppliers using similar forums, where suitable, to support our continuous improvement in our tier 2 supply chain transparency.

Supplier Code of Conduct acknowledgment

Our Supplier Code of Conduct outlines our expectations of our suppliers and members of their supply chain against five key principles: Safety; Business Integrity; Labour and Human Rights; Communities; and Environment. Since the implementation of our Supplier Code of Conduct in 2019, we have continued to work with our existing suppliers to increase formal acknowledgement in instances where we do not have contracted obligations for compliance.

During FY2024, we focused our efforts on suppliers without a formal contractual arrangement in place accepting the Supplier Code of Conduct, with annual spend of over \$1 million or a very high/high-risk rating in our third-party risk assessment platform. To streamline this acknowledgement request process, we worked with our Procurement teams to identify a key contact from each supplier and reissued the Supplier Code of Conduct to them, requesting formal, written acknowledgement. We aim to continue to work with these suppliers to obtain acknowledgement during supplier data maintenance and/or procurement activities.

Monitor supply chain risk

Aurizon continues to monitor the potential impact of key supply chain risks on our business (such as shipping

disruptions, cyber security risks, global tensions) through monitoring news, expert commentary, and information from our suppliers. Monitoring these events not only helps Aurizon to reduce exposure to business risk. It can also support our suppliers by ensuring we are not putting pressure on them to supply more stock or to meet unrealistic deadlines because these practices may heighten the risk of vulnerable workers in our supply chain being exploited.

Supplier audits

In FY2024, three site audits were undertaken with key rollingstock suppliers (one tier 1 supplier site and two tier 2 supplier sites) in Australia, USA and Mexico. To complete the audits, Aurizon engaged a third-party independent auditor. The assessment of each site focused on responsible sourcing and consisted of:

- review of documentation, including payroll, time sheets, company policies, and employee information
- site tour
- in most cases, worker interviews.

The audit reports were shared with each supplier, and review meetings were held to discuss the report and findings, which we will continue to work through in FY2025.

Adverse media

While transitioning to our new third-party risk assessment platform, we undertook a detailed screening of a selected supplier group consisting of those with a very high/high-risk rating and top spend suppliers within the Aurizon group. The review, which focused on adverse

media categorised as ‘labour rights’, returned no results for modern slavery risks via the media in the last 12 months. Five historical media articles (older than 12 months) were flagged for a potential risk of modern slavery. Further investigation showed that remediation had been completed or risk had been evaluated in line with our Modern Slavery Decision Framework.

FY2024 prioritised suppliers

In total, 35 SAQs were issued in FY2024. Based on a combination of spend and risk profiles, 20 suppliers were prioritised for further due diligence via SAQs, including three suppliers who also completed our supply chain mapping workshops. The remaining SAQs were issued as part of other procurement-related modern slavery due diligence.

These suppliers were issued an SAQ via our third-party risk assessment platform and, based on responses received, the majority returned an overall risk score of low or very low. Four suppliers submitted non-preferred responses to critical questions, resulting in follow-up conversations for further investigation.

During these conversations, it was identified that due to a combination of question framing and supplier review, these suppliers had incorrectly interpreted the question, resulting in them submitting an incorrect response.

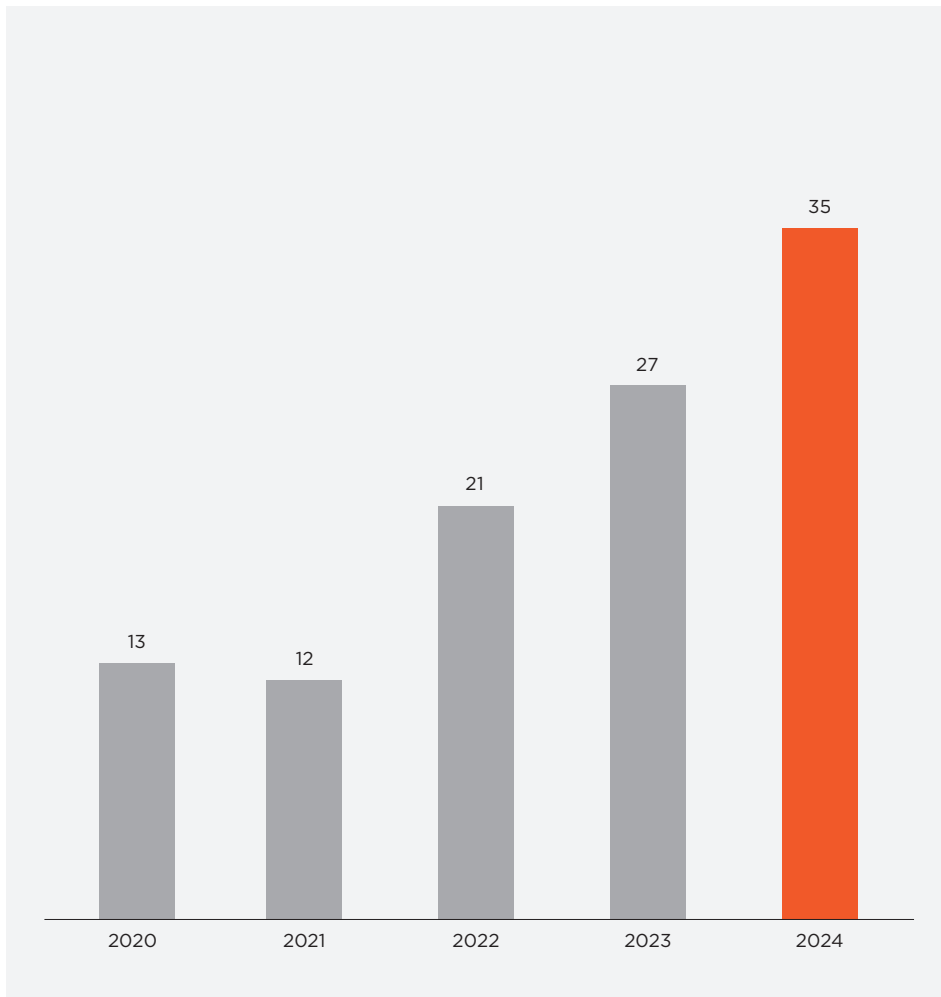
When these suppliers were given the opportunity to resubmit their SAQs, these changes (including audit history) were formally recorded in the third-party risk assessment platform. Key insights into the SAQs can be seen in Table 6.

⁸ Global Slavery Index 2023.

Table 6 FY2024 SAQ key insights

% respondents	Insight
75%	Have assessed the risks relating to modern slavery in their operations and/or supply chain
67%	Have a process for evaluating and selecting suppliers, with consideration to human and labour rights practices
55%	Were reporting entities under modern slavery legislation
85% of the 55%	Report under Australian legislation, <i>Modern Slavery Act 2018</i> (Cth)
56%	Have operational sites outside Australia. Top site locations: 1. USA 2. New Zealand 3. China and UK
80%	Provide human rights and modern slavery training to employees or employees and suppliers

Figure 6 SAQs issued through due diligence activities



Three suppliers failed to respond to our SAQ requests. While one of these entities is a reporting entity under the Act, and one is a reporting entity under the California Transparency in Supply Chains Act 2010, we will follow up each supplier in FY2025 to assess their approach and maturity to modern slavery risks.

As a result of our due diligence this year, no evidence of modern slavery was identified within our current supply chain. Despite no evidence being identified, we acknowledge that we could still be directly linked to modern slavery through our supply chain. Continued due diligence is important to improve transparency.

As we continue to broaden the scope of the application of SAQs, our understanding of our suppliers is improving. Figure 6 outlines our progress since commencing our due diligence processes in FY2020.

Actions taken in our operations

We recognise the importance and value in continually reviewing our operations to ensure our actions remain appropriate and responsive to the potential risks. Key actions completed on our operations in FY2024 include:

People Insights Survey

Our annual People Insights Survey provides our people with the opportunity to give feedback on their experience working with Aurizon. It enables us to continue to improve in areas that matter most to them at work.

Feedback from our 2024 People Insights Survey helped inform several improvements within our business units and functional areas, as well as company-wide initiatives, including:

- Policy and training: reviewed and refreshed our Bullying, Harassment and Discrimination policy and training, emphasising that these behaviours will not be tolerated. Our training program expands on sexual harassment and the need for early intervention and reporting.
- myAcademy (Aurizon’s online learning platform): strengthened and aligned to Aurizon’s Capability Framework to allow a more targeted approach to learning in current and possible future roles.

- **Capability Framework:** upskilling sessions were held to help our people understand the development tools available to enable growth and achieve their full potential.

Refine risk management policies and procedures

In our FY2023 Modern Slavery Statement, we committed to the following actions. These actions intertwine and will be detailed collectively below:

- Further define and update our Modern Slavery Framework
- Augment and optimise our existing supplier due diligence and prequalification risk assessment procedures
- Refine our modern slavery supply chain risk management policies and procedures.

In conjunction with implementing our third-party risk assessment platform, we reviewed our Modern Slavery Framework and supporting procedures. As a result, the resources now formally align with Aurizon’s Enterprise Document Management process and taxonomy. Changes included a designated Supply Chain Due Diligence Procedure, and further refined process tools and templates to support the Modern Slavery Framework and the Modern Slavery Decision Framework.

We consulted with the working group, e.g. Risk Management and People (Human Resources), to confirm consistency with related policies and procedures. After the approval process, all associated documents were published and shared with the relevant stakeholders. Further training is scheduled for early FY2025.

Modern slavery training

Since the initial rollout in 2021, we continue to expand the compliance requirement of online modern slavery training to more Aurizon employees. In FY2024, we applied the module to an additional 277 employees, including expansion across the whole Procurement & Enterprise Services and Legal & Governance teams. We plan to increase the training to other relevant employees in FY2025.

In FY2024, we also reviewed our online modern slavery training module to align the content with Aurizon’s current maturity and updated global reporting data available. The module covers topics

such as defining and describing modern slavery, identifying who may be at risk, and Aurizon’s commitments to addressing modern slavery. Importantly, it now defines key considerations and related processes for purchasing goods and services on behalf of Aurizon. The module is available to all Aurizon employees via our online learning platform.

We also conducted continued learning workshops with our Procurement teams. These sessions were tailored to provide guidance on our updated due diligence mechanisms (policies, processes and system), further detailed under the actions of refine risk management policies and procedures (operations) and modern slavery risk assessment tools (supply chain).

Alignment with new subsidiary/ SAQ - Bulk Central

In line with our FY2023 commitments and our Roadmap, we assessed our Bulk Central subsidiary, which was facilitated by the Modern Slavery Working Group with the support of subject matter experts from the business.

The goal of this assessment was to confirm the status of alignment with Aurizon’s modern slavery-related policies and procedures. To meet the goal, we used our SAQ because it assesses the key areas of maturity of an entity (including policies and procedures). This assessment yielded the same responses to that of the Aurizon Group assessment (detailed further below), except for the response in relation to annual consolidated revenue, which was expected because it was conducted at a subsidiary level. While identifying that there are differences in employment engagement mechanisms, these mechanisms meet Aurizon’s modern slavery requirements. Therefore, the overall risk score for Bulk Central is very low.

Enhance cross-functional working group

In FY2024, we formalised our Modern Slavery Working Group, whose key purpose is to support the execution of program actions and reporting requirements. The working group’s members are subject matter experts from key areas, including Procurement, Human Resources, Legal, Governance, Risk & Assurance. Formalising the working group has raised awareness of modern slavery risk and Aurizon’s obligations as a reporting entity and streamlined the completion of committed actions. During FY2024, the working group conducted regular meetings and updates, ensuring

ongoing communication and tracking of program progress. The working group was also involved in the review of Aurizon’s FY2024 Modern Slavery Statement.

Complete self-assessment questionnaire/reassess maturity

Our reassessment of Aurizon’s maturity in FY2024 used our newly implemented third-party risk assessment platform. The SAQ was completed in consultation with the Modern Slavery Working Group and assessed against the same criteria as our suppliers, as described above in ‘Actions taken in our supply chain’.

Aurizon returned an overall risk score of very low, with very low or low ratings for seven of the eight SAQ sections. The remaining section relating to supply chain transparency and oversight returned a rating of medium. As detailed in this modern slavery statement, Aurizon is aware that gaining greater transparency of our supply chain is important. Each year, our due diligence activities and committed actions will continue to increase our understanding.

Employee awareness

We continued to engage with our employees on the topic of modern slavery through a variety of internal communication tools, including:

- Providing status updates at Procurement townhall meetings and facilitating due diligence refresher training
- Engaging with our Modern Slavery Working Group members monthly through written updates and meetings (as detailed above)
- Issuing of all-staff communication on the release of Aurizon’s modern slavery statement and commitments
- Updating our Procurement Portal (available to all Aurizon employees) with relevant modern slavery-related information, including our FY2024 commitments, Roadmap, access to contact details for the Modern Slavery Working Group members, and guidance on customer requests for questionnaire completion
- Expansion of the modern slavery awareness training module
- Targeted communications to stakeholders (for example, Procurement and Customer Account teams).

Roadmap – subsidiary SAQs

During FY2024, subsidiaries within the Aurizon Group that were not wholly owned or controlled were reviewed to establish current operating status and eligibility for issuing of our SAQ. Of the six identified entities, one was deregistered in FY2024, two are dormant, and the remaining three were issued formal requests to complete SAQs. Results of these SAQs show risk ratings between very low and low, with due diligence completed in line with our Modern Slavery Framework and no outstanding flagged responses or actions.

Grievance mechanisms

We are committed to giving our employees, contractors, suppliers and the general community the opportunity to safely raise grievances about Aurizon upholding and respecting human rights. This includes the opportunity to provide information on specific modern slavery issues.

Our Whistleblower Hotline is operated by an independent third party. It enables employees, contractors, suppliers, and the general community to anonymously report suspected or actual illegal activity, breaches of company policy, and potential fraud or misconduct. This applies even if the matter does not meet the strict criteria for protection under the *Corporations Act 2001* (Cth).

Aurizon’s Whistleblower Hotline is promoted widely to internal and external stakeholders. It is available publicly on the Aurizon website as well as the Supplier Code of Conduct and our Modern Slavery Statement (MSS). In FY2024, the hotline information was also communicated via our enterprise-wide newsletter, online training module, and supplier information pack. In FY2024, no modern slavery concerns were reported.



If you see something that’s wrong, make the **right call** and speak up

The Whistleblower Hotline is there for you to report improper activities within Aurizon. All calls can be completely anonymous, so you can be 100% confident in reporting your concerns without any repercussions. From fraud and corruption to bullying, discrimination and life endangering behaviour – when you see something that feels wrong, make the right call.

WHISTLEBLOWER HOTLINE
1800 144 774



In FY2024, our focus was to evaluate and uplift Aurizon's maturity.

Assessing the effectiveness of our actions

We strive to improve the way we assess and address modern slavery risks in our operations and supply chain, including the way in which we assess the effectiveness of our actions. Initiatives we have used against our key performance areas are outlined below.

Governance and due diligence

We continue to report annually to the Aurizon Holdings Executive Committee and Board of Directors, providing an overview of our actions through the year to address modern slavery and our statement for reporting. Their review and feedback help to ensure our response is appropriate and in line with enterprise expectations. In FY2024, we formalised our Modern Slavery Working Group to support our modern slavery program and commitments. This extra feedback channel helps Aurizon review the effectiveness of our governance mechanisms and ensure alignment across the business. Feedback was sought from the working group regarding effectiveness of the structure and purpose.

In FY2024, we did a considerable amount of work implementing a new risk assessment tool and reviewing and revising our modern slavery-related policies and procedures. These actions support Aurizon's continuous improvement goals and ensure we are pivoting our approach to assessing and addressing our modern slavery risks as our understanding matures.

During FY2024, our modern slavery procurement subject matter experts attended a session with a leading sustainability and supply chain expert. It provided an opportunity to discuss Aurizon's modern slavery journey and focus areas and to gain valuable feedback on shared issues about tier 2 supply chain transparency. These opportunities help us focus on how we can continue to mature our approach to assessing and addressing modern slavery risks.



Procurement and supply chain

Each year, we continue to monitor several indicators: completion rates of employee awareness training; supplier acknowledgements of Aurizon's Supplier Code of Conduct; and outcomes of due diligence activities in line with our Modern Slavery Framework. Similarly, we assess the effectiveness of our actions as part of our annual 'year ahead' plan.

In FY2024, we requested feedback from suppliers who participated in supply chain mapping workshops or site audits. Suppliers said that the workshops were an effective mechanism because they provided them the opportunity to understand the intent of the exercise and, as a group, to map out key products. This approach was preferred over the more common approach of issuing an SAQ for tier 2 insights.

Training and education

During FY2024, the Modern Slavery Awareness training module was expanded to more employees within the Procurement team.

We view this training as an effective way to increase awareness with our employees. At the end of FY2024, our completion rate was over 97%.

Aurizon's modern slavery maturity

We continue to revisit and reassess our maturity by using our SAQ to understand how our actions are supporting our maturity in relation to modern slavery and human rights.

The Modern Slavery Working Group reviews areas of higher risk scoring; any areas of improvement identified are incorporated in our annual priorities, as outlined in the 'Our year ahead' section.

In FY2025, our focus, in line with our Roadmap, will be to 'Embed and Grow'.

Our year ahead

In FY2025, our focus, in line with our Roadmap, will be to 'Embed and Grow'. Aurizon has identified the following priorities:

Governance & due diligence

- Increase awareness of modern slavery risks with Aurizon employees
- Implement efficiencies leveraging our third-party risk assessment platform

Our operations

- Due diligence requirements for new subsidiaries

Our supply chain

- Continue the expansion of due diligence activities with suppliers

This is our fifth Modern Slavery Statement made pursuant to the Act. It constitutes the modern slavery statement of the Aurizon Group for the year ending 30 June 2024 (FY2024).

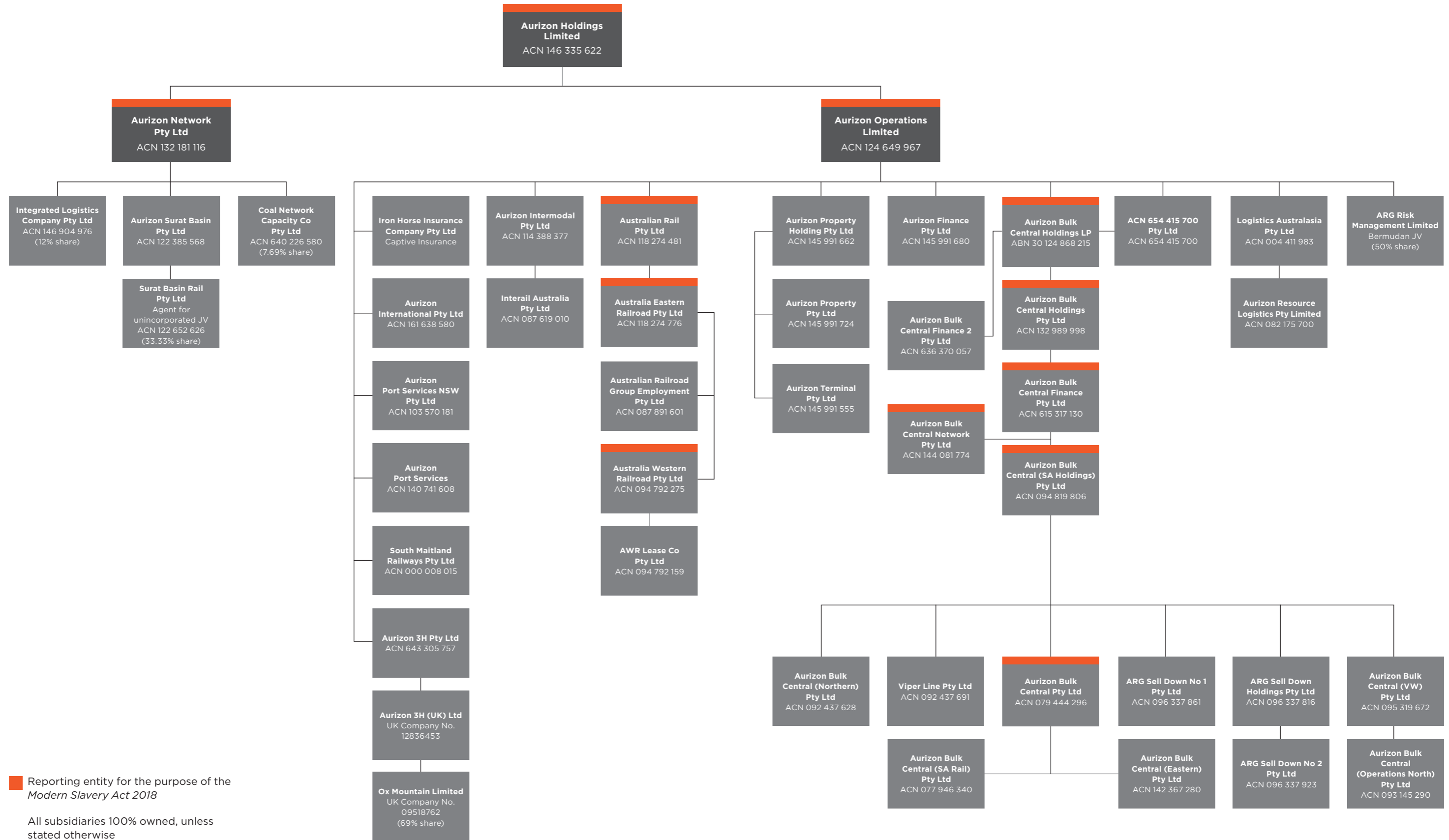
The statement has been approved by the Aurizon Holdings Board of Directors, as the principal governing body of the parent entity of the Aurizon Group on 11 October 2024.




Andrew Harding

Managing Director &
Chief Executive Officer

November 2024



 Reporting entity for the purpose of the Modern Slavery Act 2018

All subsidiaries 100% owned, unless stated otherwise