

Modern Slavery Statement

FY2024–2025





Table of contents

Table of contents.....1

Acknowledgement of Traditional Owners and Elders 2

A message from our Chair and Chief Executive Officer 3

Alignment to the Modern Slavery Act..... 4

About Queensland Rail 5

 Our structure6

 Our operations 7

 Our governance8

 Our supply chain10

Our approach..... 12

 Operational risks..... 12

 Supply chain risks..... 13

Our actions..... 15

 Managing risks within our operations 16

 Human rights 17

Assessing effectiveness 18

Looking forward19

Contribution and endorsement.....20

 Contribution 20

 Endorsement..... 20

Acknowledgement of Traditional Owners and Elders

Queensland Rail acknowledges the many Traditional Owners of the lands on which we operate and pays our respects to their Elders, past and present. We recognise their strengths and enduring connection to lands, waters and skies as the Custodians of the oldest continuing cultures on the planet.

We remain committed to actively contributing to Australia's reconciliation journey through listening and learning, empowering more diverse voices and working together for a better tomorrow. We acknowledge the contribution of Aboriginal and Torres Strait Islander people within Queensland Rail and the communities we serve.





A message from our Chair and Chief Executive Officer

At Queensland Rail, our business is built on the principles of integrity, probity, and responsibility. These core values guide us and our suppliers. We are unwavering in our commitment to eliminating modern slavery from our operations and supply chains, in alignment with the *Modern Slavery Act 2018 (Cth)* (The Act).

We are proud to present our fifth Modern Slavery Statement, representing both Queensland Rail (ABN 68 598 268 528) and Queensland Rail Limited (QRL) (ABN 71 132 181 090) — collectively known as Queensland Rail. This statement meets the seven mandatory criteria of The Act and outlines the proactive steps we have taken to identify and address the risks of modern slavery in our operations and supply chain for the fiscal year from 1 July 2024 to 30 June 2025 (FY2024–2025).

Our commitment to combatting modern slavery is strengthened by ongoing enhancements to our internal governance. We recognise that the fight against modern slavery is a continuous journey. We remain dedicated to ongoing improvement, learning, and adapting our strategies to effectively address this global issue. By working together with our suppliers, partners, and stakeholders, we aim to make a meaningful impact and contribute to a world free from modern slavery.



Andrew Wellington
Chair



Kat Stapleton
Chief Executive Officer



Alignment to the Modern Slavery Act

This statement describes the activities we have undertaken in the FY2024–2025 to assess and address the risk of modern slavery within our operations and supply chains.

Table 1 below links the sections of the Statement that specifically address the mandatory content required under The Act.

Table 1. Location of Queensland Rail Responses to the Act

Australian Modern Slavery Act mandatory reporting criteria	Queensland Rail response section	Pages
1. Identify the reporting entity	About Queensland Rail	3
2. Describe the reporting entity's structure, operations and supply chains of the reporting entity and any entities it owns or controls	About Queensland Rail	5–11
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	Our approach	12–14
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	Our actions	15–18
5. Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness	19
6. Provide any other relevant information	Looking forward	20
7. 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)	Consultation and endorsement	21



About Queensland Rail

Queensland Rail has been connecting communities since 1865, supporting local jobs, industries and economies. We are committed to delivering world-class rail services that are safe and reliable for our customers.

Our business is built on the principles of respect, fairness, and care for everyone involved—our team members, customers, contractors, suppliers and their workers, as well as the broader community. These values drive our unwavering commitment to upholding human rights, including taking decisive action against modern slavery.

We are acutely aware of how our business activities impact human rights and where modern slavery risks may arise within our operations and supply chains. Given the complexity of our operations and the diversity of our stakeholders, we are dedicated to proactively identifying and addressing these risks.

Our stakeholders and commitment to human rights

Queensland Rail is deeply committed to upholding human rights, including the right to freedom from slavery.

This commitment is rigorously enforced across all our relationships and business operations.



Our customers



Our people



Our suppliers



Our communities



Our government, regulators and industry groups



Our values

<p>1 Queensland Rail We do better together</p>	<p>Treat others with respect We appreciate everyone's contribution and differences.</p>	<p>Empower our people We have confidence in our people</p>	<p>Act safely We work safe, to go home safe</p>	<p>Make a positive difference We learn from today, to improve tomorrow</p>
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Our structure

Queensland Rail is a statutory authority established under the *Queensland Rail Transit Authority Act 2013* (Qld) (QRTA Act) and is a statutory body for the purposes of the *Financial Accountability Act 2009* (Qld) and the *Statutory Bodies Financial Arrangements Act 1982* (Qld).

Queensland Rail discharges its statutory functions through its wholly owned subsidiary, QRL. QRL does not employ any personnel but owns all non-employee-related assets and contracts. It performs the role of rail transport operator under the *Rail Safety National Law (Qld) Act 2017*.

Queensland Rail's statutory functions include:



Management of railways.



Provision of rail transport services, including passenger services.



Construction and maintenance of rail transport infrastructure.

Queensland Rail is structured around two lines of business focused on our differing customer needs across the state: **South East Queensland** and **Regional**. This modern slavery statement also covers subsidiaries of QRL.



Our operations



\$11.3B total assets



>6,600km network



7,900+ employees



8,503 services a week
in SEQ



More than 55M passenger trips
(FY2024–2025) across our network

With total assets of \$11.3 B and a network that extends more than 6,600 kilometres (km) across the state, we are focused on delivering our services efficiently and sustainably to create value for our customers and Queenslanders.

Our 7,900+ strong workforce delivers services across our South East Queensland (SEQ) and Regional networks, including Travel and Tourism services, and freight.

Our SEQ business provides 8,503 services each week, supporting our customers to reach their destinations safely and on time. Across the last financial year (FY2024–2025), 55M passenger trips were taken on the SEQ network, an increase of more than 14 per cent when compared with FY2023–2024.

Our Regional business provides rail access for freight operators, supporting the critical transport of resources and general freight across the state.

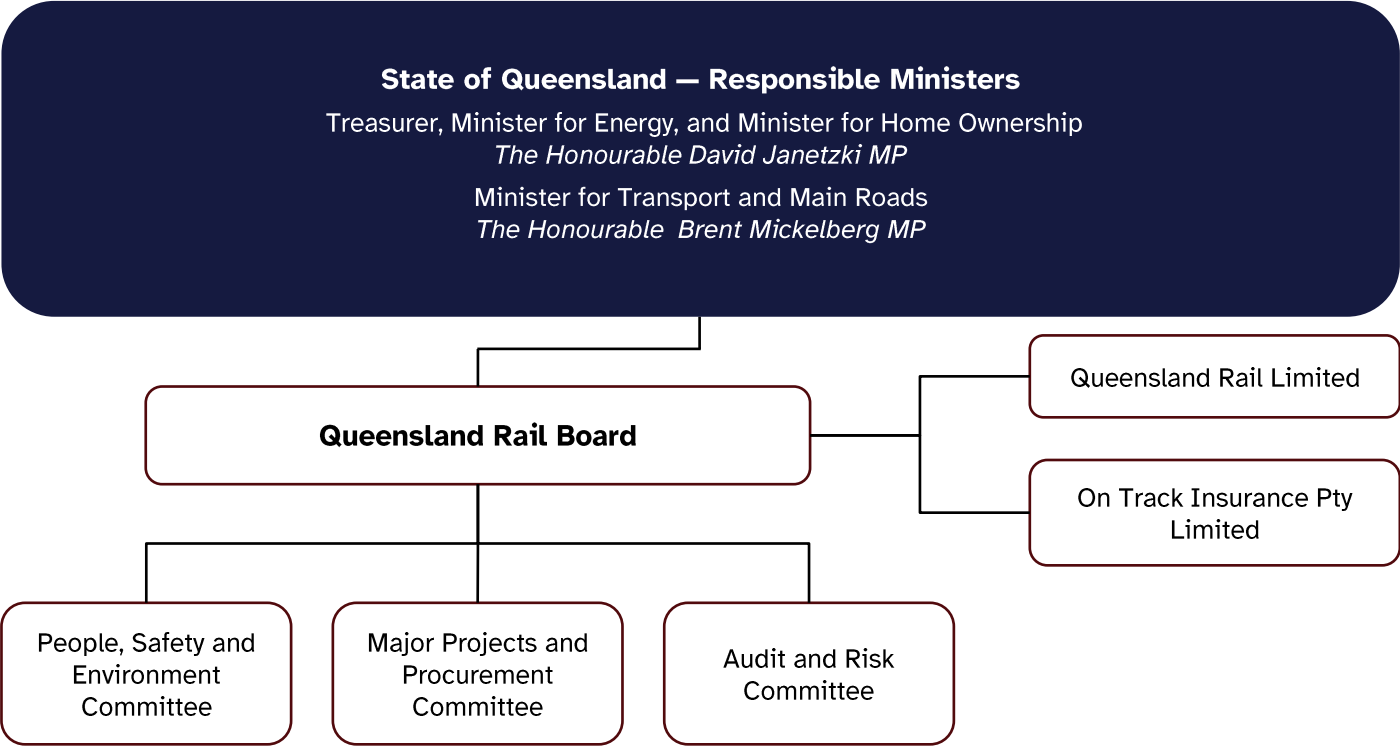
The regional commuter and rail tourism markets are serviced by the Travel and Tourism team. There are eight services connecting regional communities across Queensland with other regional centres and SEQ. These services support the Queensland tourism industry through the provision of unique rail tourism experiences.

We are proud of the role we play in providing vital passenger, tourism and freight services and we are dedicated to ensuring our systems, procedures and practices reflect the highest standards of corporate governance.

Our governance

Queensland Rail is committed to ensuring that its systems, policies, processes and practices reflect the highest standard of corporate governance. Over recent years, we have worked to integrate our modern slavery strategy and response into our broader governance structure. Processes have been established to ensure that Queensland Rail’s corporate governance practices are reviewed regularly and are continually refined in accordance with its enterprise governance framework.

Our governance structure



Our governance bodies

Queensland Rail Board	<p>Responsible for the approval of Policy in accordance with legal and regulatory obligations, and to enable Queensland Rail's pursuit of opportunities is aligned with its vision and values in an ethical and responsible manner.</p> <p>Responsible for overseeing Queensland Rail's modern slavery strategy and response, including approving our Modern Slavery Statement and key policies and standards. Receives quarterly updates about human rights and modern slavery through reports and accompanying meetings.</p>
Audit and Risk Committee	<p>The Audit and Risk Committee is a Board committee created to assist the Board in the effective discharge of its governance and oversight responsibilities relating to the financial reporting and risk management of Queensland Rail.</p> <p>The committee oversees and monitors the preparation of financial statements, internal control structures, compliance and risk management frameworks and the internal and external audit functions of Queensland Rail.</p>
People, Safety and Environment Committee	<p>The People, Safety and Environment Committee is a Board committee created to assist the Board in the effective discharge of its governance and oversight responsibilities relating to the human resources, safety and environmental practices of Queensland Rail.</p> <p>The committee oversees and monitors the remuneration and performance framework for Queensland Rail's senior executives and other employees, the development of human resources policies and practices to enhance employee engagement, and workforce productivity and performance. The committee also provides strategic direction and oversight of Queensland Rail's safety and environmental policies, frameworks, and practices and strategies and initiatives relating to customer experience.</p>
Major Projects and Procurement Committee	<p>The Major Projects and Procurement Committee is a Board committee created to assist the Board in the effective discharge of its governance and oversight responsibilities relating to the delivery of major projects and procurement decisions within Queensland Rail.</p> <p>The Committee is responsible for providing strategic direction and oversight of major projects undertaken by Queensland Rail to ensure those investments are delivered in an efficient and cost-effective manner while meeting the responsible Ministers' performance and strategic expectations. The Committee is also responsible for high level oversight and monitoring of procurement processes and procedures operating within Queensland Rail.</p>
Executive Leadership Team	<p>The Executive Leadership Team is a collective of business function owners who have the authority and accountability to ensure operational management of key information assets which support their business function. They ensure all policy framework managed documents in their respective functions/discipline support compliance requirements with our legal and regulatory obligations and relevant State Government legislation, policies and guidelines.</p>



Our supply chain

Queensland Rail partners with a diverse network of suppliers who deliver a broad array of goods and services, including

- Rollingstock maintenance
- Infrastructure construction and maintenance
- Manufactured goods and spare parts
- Engineering and technical services
- Plant and machinery hire
- Electricity and other utilities
- Labour hire
- Information technology services, systems software, and hardware
- Professional and consultancy services.

Maintaining momentum and mitigating modern slavery risks in the supply chain requires alignment across the business in strategy, policies, systems, key performance indicators, and training. This effort is strongly supported by our centre-led procurement operating model, which enhances knowledge sharing and promotes best practices throughout our supply chain.

In FY2024–2025, we had



\$1.62B

Total Procurement Spend

\$280.6M SME Supplier Spend

1,255 SME Suppliers



2,734

Suppliers

\$7.5M First Nation Supplier Spend

33 First Nation Suppliers

Our supply chain initiatives

Local buying	Queensland Rail promotes local purchasing, which enhances supply chain visibility and improves the assessment of modern slavery risks. The majority of our suppliers are based in Australia, with over 99% of our direct spending in FY2024-2025 going to Australian-based suppliers. However, while we engage directly with Australian companies, this may not always reflect the country of origin for the goods or services provided.
First Nations procurement	Our First Nations procurement approach emphasises the proactive pursuit of opportunities to source goods and services from First Nations suppliers. This strategy helps us to build stronger relationships, create opportunities, and deepen our understanding of Aboriginal and Torres Strait Islander businesses and communities. In FY2024-2025, the company continued to forge long-term agreements with various First Nations groups, fostering mutually beneficial outcomes, including more efficient delivery of Queensland Rail’s capital projects and works.
Sustainability Program	Following the development of our first Sustainability Program in FY2022-2023, Queensland Rail continues to progress the active identification and management of sustainability risks and opportunities. A key focus is on sustainability assessment in projects and works, identification of low-carbon materials options, and supply chain assessments, including for scope 3 emissions.



Our approach

Operational risks

The risks of modern slavery within Queensland Rail's operations are considered minimal, attributed to our localised organisational structure, workforce, and recruitment processes.

7,623 staff members are employed permanently and are covered by formal documented agreements ratified by the Fair Work Commission. Approximately 231 employees are paid above the applicable Queensland Rail enterprise agreement (*Enhanced Remuneration Package and Award Contract*) while still having their employment linked to the enterprise agreement. The remaining employees are typically professionals and employed on common law individual contracts providing full legal entitlements.

When hiring contractors, Queensland Rail utilises a panel of registered specialist labour hire organisations. Our Queensland Rail Values define how we work at Queensland Rail. Robust policies, ongoing monitoring, staff training and accessible grievance/complaint mechanisms are key controls we use to mitigate the risk of modern slavery in our operations.

7,900+

Staff members



7,623

Employed permanently under
Enterprise Agreements









Supply chain risks

Our Risk Management Framework is aligned with ISO 31000 (2018) and is guided by our Risk Management Standard, which underscores our commitment to a continuous, integrated, and consistent approach to risk management across the organisation. By identifying, understanding, and assessing modern slavery risks, we can mitigate the likelihood of adverse impacts and make confident, risk-informed decisions. Queensland Rail has continued to implement a four-step approach—'Identify,' 'Assess,' 'Remediate,' and 'Sustain'—to address modern slavery risks within our supply chains. This approach is supported by strong internal governance, ensuring that appropriate internal controls, processes, and capabilities are in place to uphold it.

Our four-step approach to manage modern slavery risks

Identify	Assess	Remediate	Sustain
			
<p>Undertake research to better understand modern slavery risks</p> <p>Collaborate with other Queensland Government agencies through a Community of Practice</p> <p>Proactively review existing procurement and supply chain processes to identify potential exposure to modern slavery risks</p>	<p>Conduct risk assessments on high-risk industries and geographic locations</p> <p>Assess supplier's existing governance and controls</p> <p>Based on the risk assessments and ratings of the effectiveness of controls, determine the supplier's residual risk of modern slavery</p>	<p>Work collaboratively with suppliers to develop plans to address risk areas</p> <p>Implement plans and provide ongoing monitoring of risk</p> <p>Provide an immediate and thorough response to issues and allegations</p>	<p>Take learnings from previous phases to modify future approaches and improve continuously</p> <p>Conduct a maturity assessment on internal capabilities</p> <p>Develop a roadmap of ongoing initiatives</p>



As part of our due diligence process, we evaluate our supply chain during the early sourcing stages of each tender project. Suppliers undergo periodic assessments through this process. Through a high-level evaluation, we have identified the following categories as having an elevated risk of modern slavery.

Potential modern slavery risks in our supply chain

Rail infrastructure and rollingstock	Queensland Rail sources significant quantities of consumables and inventory for rail infrastructure and rolling stock. The complexity of our supply chain and the diverse geographical origins of these materials may pose risks related to labour exploitation and human trafficking.
Facility management within corporate services	The facility management sector may present risks of underpaid labour and debt bondage, particularly due to outsourced arrangements that limit visibility. The industry's reliance on low-skilled workers and those on temporary visas further heightens the risk of modern slavery.
Information, communication, and technology	Queensland Rail relies on various technology products, including phones, laptops, and monitors. There are potential risks of forced and child labour associated with the manufacturing of these hardware items, particularly due to their source locations.
Personal protective equipment (PPE)	Queensland Rail procures PPE for operations, with most products being manufactured overseas. The source locations for these PPE items present potential risks of forced and child labour.

Consequently, the overall modern slavery risk in our supply chain remains high, particularly among suppliers in categories with elevated modern slavery risks.

Our actions

In FY2024–2025, Queensland Rail continued to progress its efforts to address and mitigate modern slavery risks across our operations and supply chain. Building on the achievements of previous years, our actions this year have focused on strengthening governance, enhancing supply chain visibility, and deepening organisational capability.

Governance and process

A review was conducted of all active suppliers with annual spend over \$500,000, covering approximately 365 suppliers. The previous approach to identifying high-risk suppliers relied mainly on spend and industry classifications from the Walk Free Global Slavery Index 2023. The review highlighted that spend alone is not sufficient to determine a supplier's risk profile.

Each supplier was grouped by category and spend, then assessed against high-risk industries identified in the "Potential Modern Slavery Risks in Our Supply Chain" section. A tier rating was applied, with Tier 1 suppliers deemed high risk and requiring ongoing assessment as part of contract management due diligence. The first round of this review was completed in June 2025, and future assessments will be embedded into business-as-usual processes.

Supply chain and procurement

Queensland Rail evaluated 350 new suppliers using the updated modern slavery self-assessment questionnaire. No issues were discovered during these assessments.

Capability building

Queensland Rail continued to strengthen organisational awareness and capability in managing modern slavery risks. During FY2024–2025, representatives attended three Australasia Modern Slavery Network and Community of Practice sessions, a forum where Queensland Government-owned corporations meet regularly to exchange experiences, share challenges, and discuss best practice approaches to modern slavery risk management.

In addition, Queensland Rail participated in the 2025 ESG in Procurement Conference in Sydney, which provided further insights into emerging practices, regulatory expectations, and supplier engagement strategies. These activities have enhanced the knowledge base across our teams, enabling us to better integrate modern slavery considerations into day-to-day procurement and supply chain activities.

Managing risks within our operations

Queensland Rail is guided by a comprehensive set of policies, procedures, codes of conduct, and standards that embody our ethics and 1TEAM values. These documents direct how we treat our employees and engage with customers, suppliers, and business partners, underscoring our commitment to integrity, probity, and accountability in all our operations. We also require our suppliers to adhere to these same high standards. Each of these documents is regularly reviewed and updated to ensure ongoing relevance and effectiveness.

Documentation we maintain

Document name	Purpose
Code of Conduct Standard	This Standard has been developed to enable our people to understand the behaviours expected to pursue Queensland Rail's vision and purpose.
People Policy	This policy recognises that our people are our greatest assets. Queensland Rail is committed to ensuring our workplace is an inclusive, collaborative and productive environment where our people work together to help Queensland Rail achieve its strategic and operational objectives.
Public Interest Disclosures and Whistleblowing Specification	Queensland Rail holds the highest expectations of conduct and ethical behaviour in all our business activities and in achieving good corporate governance. In pursuit of this, Queensland Rail values the disclosure of information about suspected wrongdoing.
Ethics and Integrity Framework	The purpose of this Framework is to encourage confidence in Queensland Rail by helping employees, contractors and other associated parties deal appropriately with ethics or integrity issues and bringing together Queensland Rail's principal ethics and integrity sources.
Values Principle	This Principle is about Queensland Rail's commitment to creating a unique, focused and accountable business culture. The 1 Queensland Rail approach is reinforced through our 1TEAM Values and our purpose. This principle applies to all Queensland Rail employees, contractors, consultants and visitors to Queensland Rail premises other than customers of Queensland Rail services.
Fraud and Corruption Control Standard	Queensland Rail's fraud and corruption framework is based on a set of essential conditions to establish a sound fraud and corruption control environment.
Recruitment and Selection Specification	This specification sets the requirements for recruitment and selection in Queensland Rail (excluding contract management and executive level positions).
Risk Management Framework and Standard	This Standard is part of the corporate governance framework and outlines the process through which Queensland Rail's risk management is directed, controlled, and assured.



Human rights

Queensland Rail is committed to ensuring it acts and makes decisions compatibly with the *Human Rights Act 2019 (Qld)* (HRA). Queensland Rail continually looks for process improvements to ensure that any decision made gives consideration to the impact on individual human rights.

In circumstances where it is identified that individual human rights might have been impacted, an impact assessment is undertaken.

During this financial year Queensland Rail

- Assessed all new and relevant policies and procedures for compatibility with the HRA, making changes where necessary
- Continued to raise awareness about the HRA and its effect on Queensland Rail's operations.
- Considered the nature of human rights complaints and made adjustments to Queensland Rail's existing policies and procedures as part of our commitment to 'continuous improvement' to adjust to consumer demands and expectations
- Received four human rights complaints.

At Queensland Rail, we have several mechanisms for employees and third parties to report behaviours not aligned with our expectations and the expectations of our customers and stakeholders.

The Human Rights Unit is in place to receive complaints and can be contacted by email humanrights@qr.com.au or phone: 07 3072 8885.

All suspected and actual corrupt conduct can be reported to Safe Station safestation@qr.com.au or 1800 723 377 or via the avenues below

- Stopline 1800 951 277
- QR@stopline.com.au
- qr.stoplinereport.com
- Queensland Rail c/o Stopline, PO Box 403, Diamond Creek, Vic 3089, Australia.

There were no issues raised in relation to modern slavery through these reporting channels.

Assessing effectiveness

Queensland Rail is committed to continuously improving how we manage modern slavery risks within our operations and supply chains. We regularly review and strengthen our training initiatives, due diligence processes, and governance to ensure risks are effectively identified, understood, and mitigated.

Assessment of our modern slavery approach

Component of our modern slavery response	How we assess our effectiveness in this area?
Policy and governance frameworks	We routinely review key policies to ensure they remain current and effective, including an annual review of our Procurement Framework. To monitor the successful implementation of our policies and governance frameworks, we provide quarterly reports to both the Board and the Audit and Risk Committee. Additionally, we incorporate continuous improvement initiatives drawn from our engagements with the Modern Slavery Community of Practice (MSCP).
Risk monitoring	We continuously monitor our modern slavery risk profile to ensure our understanding remains accurate and relevant. This includes collaborating with suppliers to validate our assessment of modern slavery risks within our extended supply chain.
Performance monitoring	<p>We employ a multi-faceted approach to performance monitoring, which includes periodic reporting to the Executive Leadership Team and the Major Projects and Procurement Committee. Key metrics tracked include the number of suppliers in scope, the proportion of suppliers contracted and assessed for modern slavery risks, the status of complaints against suppliers, and the number of resolved and outstanding non-conformances to address audit recommendations.</p> <p>Our engagement with suppliers remains strong, as evidenced by our participation in the modern slavery risk questionnaire, where we achieved a 100% response rate from the suppliers approached this year.</p>
Our grievance mechanisms and remediation processes	We actively consider stakeholder feedback through various channels, such as surveys, forums, and direct communications, to ensure we remain responsive to concerns. We monitor and report on the number of human rights and supplier complaints received and addressed, with a structured process in place to ensure timely and effective resolution. Insights gained from these complaints contribute to our continuous improvement efforts, helping us refine our policies and strengthen our engagement with suppliers.
Training and Awareness	We collaborated with like-minded organisations through the MSCP to exchange insights on risk assessment processes and controls. Additionally, we continued our awareness campaign to educate employees about the risks of modern slavery and its impact on our operations and supply chain.



Looking forward

Queensland Rail remains committed to strengthening how we identify and manage modern slavery risks within our operations and supply chains. In FY2025–2026, our focus will be on further embedding these considerations into our broader sustainability agenda.

Technology and innovation

Queensland Rail remains committed to strengthening how we identify and manage modern slavery risks within our operations and supply chains. In FY2025–2026, our focus will be on further embedding these considerations into our broader sustainability agenda.

Sustainable procurement and supply chain

We will develop a sustainable procurement and supply chain framework that incorporates modern slavery alongside environmental and social priorities. This will ensure our sourcing practices remain responsible, balanced, and aligned with broader sustainability objectives.

Collaboration and capability

We will continue to participate in industry and government forums to share insights, learn from peers, and build the capability of our people. This ongoing collaboration will help us maintain strong governance, improve transparency, and contribute to the reduction of modern slavery risks.



Contribution and endorsement

Contribution

Collaboration is central to Queensland Rail's ethical approach. By uniting our efforts and exchanging knowledge across the organisation on modern slavery and broader human rights issues, we drive meaningful progress and build momentum in this critical area.

This Statement was prepared in consultation with both reporting entities covered by this joint statement (namely Queensland Rail and QRL) and with subsidiaries of QRL. Procurement and Contracts, Legal, Analytics and Reporting, People, Safety and Sustainability, and Brand, Reputation and Corporate Affairs were consulted in the drafting of this Statement.

Endorsement

The Board for both Queensland Rail and QRL has endorsed this Queensland Rail Modern Slavery Statement FY2024–2025.

Andrew Wellington, Chair Queensland Rail
Queensland Rail Limited

December 2025