

VicTrack Modern Slavery Act Statement

2025



VicTrack

Modern Slavery Act Statement 2025

This is the fifth statement related to the *Modern Slavery Act 2018* (Cth) made by VicTrack¹. This statement sets out the actions we have taken to address modern slavery and human trafficking risks in our business, operations and supply chain in the reporting year 1 July 2024 to 30 June 2025 (Reporting Year).

1. VicTrack means Victorian Rail Track ABN 55 047 316 805 and includes its Subsidiary Companies as set out in the section titled "Our Corporate Structure" on page 4.

Our approach

VicTrack recognises that modern slavery:

- practices such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting, physical abuse, restricting freedom of movement, confiscation of passports, wage theft and child labour² (modern slavery) are serious violations of human rights
- can be hidden in plain sight
- manifests itself in a number of forms and is a multifaceted, complex issue.

VicTrack does not tolerate any form of modern slavery in any part of its business or supply chain.

Disclosure

VicTrack sought information from 454 suppliers using a targeted modern slavery questionnaire (Questionnaire).

The questionnaire expanded our risk analysis to the entire first tier (Tier One³) of VicTrack's supply chain (see figure 1, below).

A total of 159 suppliers (35%) responded to the 2025 questionnaire. Of those who responded, VicTrack identified nine high risk instances. VicTrack immediately commenced remediation activities with the suppliers involved.

Seven suppliers cooperated and either provided significant additional information to confirm that the risks either:

- did not exist, or
- were being monitored, mitigated or remediated to varying levels of maturity.

The remaining suppliers which did not respond to the questionnaire, will continue to be monitored carefully and prioritised for follow-up during 2025–26.

The results from the questionnaire are as follows:

Risk score	2025			2024	
	% Change from last year	% Respondent	Total No. Respondents	% Respondents	Total No. respondents
Low (1–4)	-4.4	28.4	129	32.8	175
Moderate (5–7)	1.2	4.6	21	6.4	34
High (8–10)	0.3	2	9	1.7	9
Not responded	5.8	65	295	59.2	317

Table 1: Summary of VicTrack Supplier Modern Slavery Risk, Source: Ethixbase360

Our business

VicTrack was established in 1997 as a state-owned corporation with an independent Board of Directors that oversees VicTrack's performance. VicTrack owns the transport land, assets and infrastructure of the State of Victoria (the State or Victoria/n) and its subsidiary companies,¹ as set out in the section titled "Our corporate structure", hold all classes of rolling stock. The role of VicTrack is to protect and grow the value of Victoria's transport portfolio and support a thriving transport system that makes travel and living better for all Victorians.

VicTrack's transport assets – such as rail buildings, signalling, track, telecommunications network and the Melbourne Underground Rail Loop – are primarily leased via the [Department of Transport and Planning \(DTP\)](#) and franchised to the state's rail and tram operators ([Metro Trains Melbourne](#), [Yarra Trams](#), [ARTC](#) and [V/Line](#)). Assets which are not used for transport are commercialised with proceeds being reinvested to meet Victoria's transport agenda.

VicTrack works with other agencies to enhance Victoria's rail transport assets to safely connect people, places and opportunities. The VicTrack vision is, as defined in the [Transport Integration Act 2010 \(Vic\)](#) as being: "[to] meet the aspirations of Victorians for an integrated and sustainable transport system that contributes to an inclusive, prosperous and environmentally responsible state".

VicTrack's core functions include:

- telecommunication services and network infrastructure that supports public transport
- management of land set aside for transport purposes, including the development and sale of land no longer required for transport
- project management and civil engineering services for rail infrastructure upgrades
- transport facilities and asset management, including the open access Dynon Rail Freight Terminal and heritage, buildings and environmental preservation.

3. Tier One suppliers refer to those who provide goods and/or services directly to VicTrack or its subsidiary entities.

4. VicTrack's business partners, service providers, suppliers and entities directly linked to VicTrack's business operations, products and services.

Our corporate structure

The VicTrack group consists of Victorian Rail Track (trading as VicTrack) ABN 55 047 316 805 and its subsidiary companies (Subsidiary Companies) being Rolling Stock Holdings (Victoria) Pty Limited ABN 74 104 780 056 (Rolling Stock Holdings); Rolling Stock (Victoria-VL) Pty Limited, ABN 23 093 317 992; Rolling Stock (VL-1) Pty Limited, ABN 35 093 563 412; Rolling Stock (VL-2) Pty Limited, ABN 31 093 563 458; and Rolling Stock (VL-3) Pty Limited, ABN 35 093 563 476.

Our organisational structure

This reporting year, VicTrack had two specialist delivery groups – Property and Telecommunications – which were supported by three central groups: the Office of the Chief Executive, Corporate Services and Strategy and Transformation.

The two specialist delivery groups were:

Telecommunications

As a licensed telecommunications provider with network infrastructure spanning the state, we provide a full suite of telecommunications services to the transport sector. Our networks act as the backbone for public transport customer information, Myki (Victoria's paperless ticketing system), driver communications and other network critical systems, such as signalling. We also provide 24-hour network monitoring, as well as planned and emergency repair and maintenance to ensure the highest standards of reliability for the transport system.

Property

As landowners, our role is to ensure our transport land best serves the transport sector and Victorian communities. With vast land parcels across the state and air rights throughout the public transport corridor, we work across all land use matters impacting on transport land, including land sales and acquisition, property development, commercial leasing, land use and access, infrastructure and facilities management and heritage and environmental preservation.

Our values

VicTrack has four key values which guide our operations, our behaviours and our decisions:

- **Professional**
- **Collaborate**
- **Achieve**
- **Innovate**

VicTrack's operations are underpinned by the Victorian Public Sector Commission (VPSC) Code of Conduct and key principles enshrined in the *Public Administration Act 2004 (Vic)*.

Both VicTrack's values and the VPSC Code of Conduct are supported by many policies and procedures including VicTrack's Public Interest Disclosure Policy and Procedure, VicTrack's Fraud and Corruption Control Procedure, VicTrack's Conflicts of Interest Policy and VicTrack's Procurement and Sourcing Procedure.

Employees are encouraged to report any breaches or issues to their managers or in accordance with the Public Interest Disclosure Policy and Procedure. VicTrack has also implemented an anonymous reporting [hotline](#), Core Integrity, so that employees and third parties may report unacceptable conduct, including in relation to suppliers.

Governance and compliance framework

VicTrack operates its business responsibly, ethically and with integrity.

As a state-owned enterprise, VicTrack abides by, among others:

- the [Public Administration Act 2004 \(Vic\)](#) which takes a comprehensive approach to supporting good public administration in Victoria.
- the [Financial Management Act 1994 \(Vic\)](#)
- the [Principles of Probity](#) (integrity, fairness and honesty)
- the [Codes of Conduct](#) issued by the Victorian Public Sector Commission (VPSC)
- our own internal business controls, policies and procedures, which include Conflicts of Interest, Fraud and Corruption Control; Public Interest Disclosure; Competitive Neutrality; Gifts, favours, entertainment and other payments; Confidential information; Discrimination and sexual harassment; Health, Safety and Environment; Accounting, financial reporting and internal controls.

Procurement, due diligence and supply chain assurance

VicTrack follows procurement practices that meet Victorian Government and VPSC requirements, ensuring compliance with the [Supplier Code of Conduct](#).

Specialised vendor compliance systems support contractor oversight, safety and insurance compliance monitoring, business intelligence, and modern slavery risk reporting across the supply chain.

Over the reporting year, VicTrack improved its modern slavery assessment tool for Tier One suppliers to better identify modern slavery risks. From 2025–26, VicTrack will review all new suppliers for modern slavery risks using enhanced compliance resources.

Our supply chain

Tier One: Direct Supply

VicTrack has continued the work to map its overall supply chain during the reporting year and has continued to expand our knowledge of supplier activity past Tier One for the third year.

This reporting year, the number of Tier One suppliers reduced from 1088 to 921. Suppliers provided additional information regarding their own supply chains as part of our 2024–5 review process. All suppliers with active status in our finance system were reviewed.



Figure 1 2024-25 VicTrack Active Third-Party Suppliers by Country of Origin. (Source: Internal Finance Data)

In this reporting year, direct engagement reduced from nine to six countries overall: Australia, Canada, Germany, Singapore, United Kingdom and the United States.

Tier Two: Expanded Supply Chain and Business Operations

In 2024–25 there was a slight contraction in the number of countries engaged across the expanded network (from 63 to 60). Previously identified downstream supply chain links to both high-risk and sanctioned countries, specifically Russia and several high-risk countries in Central and South America and Africa, continue to be identified.

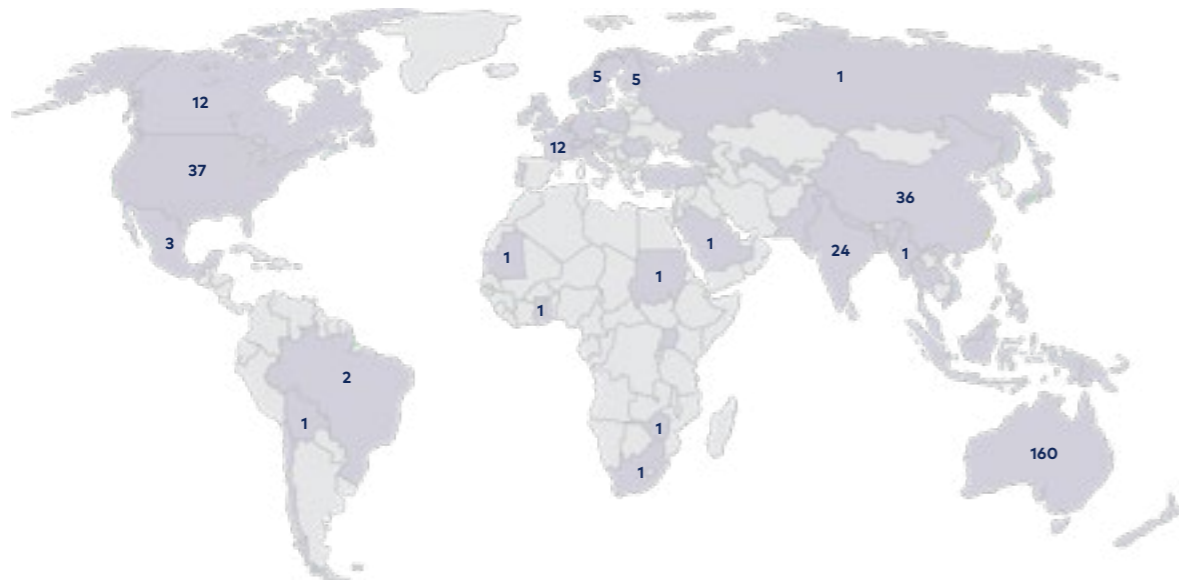


Figure 2 2024-25 VicTrack Expanded Supply Chain & Business Operations 2025 (Source: Avetta One)

Country	GSI* Rank	No. VT Suppliers 2025	No. VT Suppliers 2024
Mauritania	3	1	1
Saudi Arabia	4	1	1
Turkiye	5	3	4
United Arab Emirates	7	3	1
Russia	8	1	1

* GSI - Global Slavery Index Ranking (2023), Walk Free Foundation

Table 2 Available VicTrack suppliers with presence in countries with most prevalence of modern slavery (Sources: Avetta One and 2023 Global Slavery Index, Walk Free Foundation)

Moderate Modern Slavery Risk

The majority of VicTrack's procurement continues to be for services primarily from within Victoria in line with the [Local Jobs First](#) requirements. VicTrack considers that the risk of modern slavery continues to be a low to moderate one because VicTrack's Procurement Office has:

- expanded knowledge of the supply chain overall, which would identify additional modern slavery risk across the business
- implemented a more integrated and robust system to provide both internal and external education to operational and supply chain stakeholders
- developed targeted and general training which was rolled out from Q3 of 2023-24. To date, the completion rates of the training is as follows

	General MS Training (1 Module)	Targeted MS Training (3 Modules)
2023–24 Percentage of staff with completed training (Q4 only)	63%	55%
2024–25 Percentage of staff with completed training (full year)	100%	100%

Table 3 Modern Slavery comparative training completion for 2024–25 and 2023–24 Q4

All staff with procurement decision-making requirements were issued and completed their required modern slavery training for this financial year. Ongoing attendance of these courses and whether there is a corresponding improvement in internal knowledge and application of that knowledge will continue to be monitored by the Procurement team in future statement periods.

Modern Slavery risk by business unit

VicTrack identified in this reporting year:

- nine suppliers as being at potential high-risk of modern slavery
- 21 suppliers as a moderate risk.

The below chart provides the cross-section of risk factors identified across VicTrack overall.

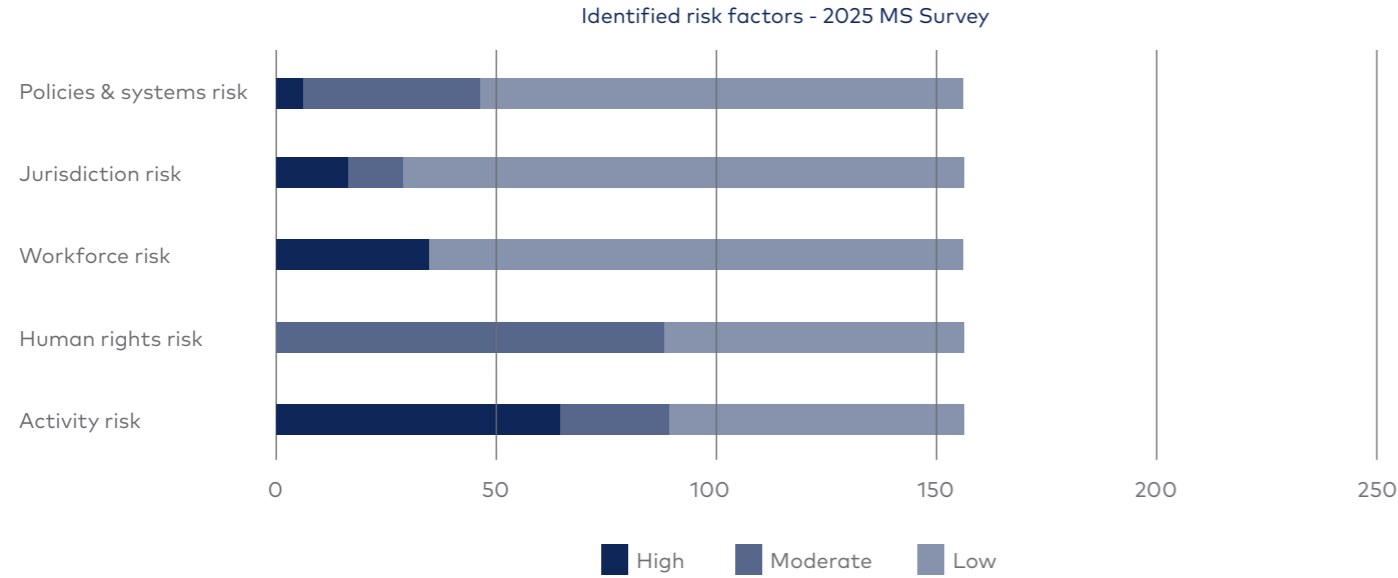


Figure 3 2025 Identified Modern Slavery risk factors from questionnaire responses (Source: Ethixbase360)

VicTrack has identified that the highest modern slavery risks continuing to impact our own supply chain operations are:

- High migrant workforces (Saudi/United Arab Emirates "Kafala" sponsorship system) with minimal to no legal rights.
- High refugee traffic (Syrians entering Türkiye & Russia).
- Political conflict (Russia/Ukraine, Mauritania). Mauritania is also the last country globally to abolish slavery on paper – there are still significant issues around hereditary ownership and dependence by newly freed citizens on previous owners due to lack of economic opportunity. Meanwhile, the ongoing conflict in Ukraine continues to test supply chains globally, as does the ongoing political impact of tariffs imposed by the United States both directly to Australia, and to indirect supply chain partnering countries.
- In almost all cases, these countries are impacted by protracted political instability, military rule, conflict and/or authoritarianism, often masking elevated modern slavery practices.

The below table summarises the cross section of suppliers with high modern slavery risk, and where they were sourced to across all VicTrack business areas:

Supplier (De-identified)	Telecommunications	Property	Support (OCE, Strategy & Transformation & Corporate Services)
Supplier 1		X	
Supplier 2	X		
Supplier 3	X		
Supplier 4		X	
Supplier 5		X	
Supplier 6		X	
Supplier 7		X	
Supplier 8			X
Supplier 9	X		

Table 4 2024–25 High Modern Slavery risk suppliers by business unit traded with (Source: Ethixbase360 and internal finance data)

It is important to note that the above are related to potential threats indicated by data provided to VicTrack; remediation activities only mitigate and provide visibility of these specific operations.

Subsidiary companies

Rolling Stock Holdings owns the majority of the State of Victoria's rolling stock (trains and trams). The Department of Transport and Planning (DTP) sources the rolling stock and transfers ownership of the assets to VicTrack. The modern slavery risk here is that parts are made outside of Australia, in countries which are identified as being high risk for modern slavery.

Rolling Stock Holdings did not enter new contracts to purchase additional rolling stock during the period from 1 July 2024 to 30 June 2025.

Case study 1: Follow up - Where low spend does not equal low risk

VicTrack a high-risk supplier in a low-risk part of our network. This supplier continues to work with VicTrack to monitor risk factors which are continually present in their supply chain activity. VicTrack is seeing evidence of small, significant improvements in their supply chain operation over time.

One of VicTrack's telecommunications suppliers with a very low overall spend, was identified over the past three years to be a continued high-risk supplier. VicTrack has annually sought more information to address remediation.

The supplier had registered high-risk scores in three areas of our questionnaire sent out through Ethixbase for this year:

- **Jurisdiction (High)**

Being a provider of components, they had goods manufactured in several countries, including China, France, United States, United Kingdom, Finland and Germany. During the 2025 remediation process, it was identified that the Chinese-based suppliers in question are wholly owned subsidiaries of large, reputable multinational corporations headquartered in the United States, Germany and France. These corporations operate under stringent corporate governance frameworks which reduces risk.

- **Activities (High)**

As a component provider, they also flagged in the survey analysis for products advised as containing several materials in the high-risk category, including copper, gold, tin, nickel and zinc, supply of these are being monitored ongoing.

- **Workforce (High)**

The supplier also advised that they employed young workers within Australia. This required follow up to confirm that these workers were being employed under appropriate conditions and has been found to be in line with Australian industrial relations requirements.

- **Policies and systems (Low - updated from Moderate in 2023-24)**

The supplier contended that appropriate policies were in place to provide protections to staff relating to anti-slavery, anti-bribery and corruption and Health & Safety; this looks to have extended into supply chain activity in 2024-25, with more stringent checking of suppliers' own ethical procurement responsibilities including modern slavery.

- **Human Rights (Moderate)**

The supplier has assessed their human rights impacts. However, the supplier had not provided any training internally, or taken steps to provide any training to their own suppliers, nor had they made any adjustments to internal policies.

The supplier provided significantly more detailed information indicating improvements to their due diligence and ongoing compliance activities, including:

- continued on-site inspections
- review of suppliers' standard and certifications, including quality and management system certifications such as ISO 9001 AS9100
- ongoing compliance engagement, including obtaining updated compliance declarations, reviewing modern slavery statements (where applicable), and monitoring changes to their corporate social responsibility policies.

While this supplier will continue to be monitored carefully, we are encouraged by the improvements made, and anticipate removing the supplier from the high-risk list in the next 12 to 24 months.

Actions taken by VicTrack during the reporting year

During the year we:

- merged our compliance reporting into a single system, removing duplication across compliance and finance portals. This merging allowed full mapping of all VicTrack's Tier One suppliers and many Tier Two suppliers in our supply chain.
- used an updated questionnaire which requested more targeted information from each of VicTrack's suppliers.

This improved reporting process reduced the timeframe of the process from 10 weeks in 2023-24 to two weeks in 2024-25.

Modern Slavery risk identified (score identified)	No. of suppliers advising risk existed	Remediation action
Workforce unable to resign from their employment by giving the supplier reasonable notice	1	Followed-up with supplier, subsequently identified a data entry error and reduced to Moderate Risk.
Combination of high-risk jurisdictions, activities and workforce indicators by supplier raised modern slavery risk to high	8	Remediation follow-up with suppliers: <ul style="list-style-type: none"> • one has been discussed in the case study • one has a Modern Slavery Statement that indicates the relevant risks are sufficiently mitigated • three further confirmed that their products and components were sourced locally and/or responsibly • one supplier had not responded at time of writing.

Table 5 High Risk suppliers with Identified Modern Slavery Risk and remediation outcome

VicTrack recognises that our suppliers have a diverse range of understanding, education and maturity in their implementation of anti-modern slavery measures. Even amongst suppliers who have a mature understanding of the general concepts, it takes time and proactive effort to embed anti-modern slavery practices into pre-existing business practices.

Improving effectiveness

VicTrack's goals for the 2025-26 reporting period are to:

- Continue to finetune the analysis activity relating to all our Tier One suppliers and further build on our expansion of supplier transparency into our Tier Two suppliers and increase transparency of our global supply chain.
- Continue to ensure all front-line purchasing staff are provided with appropriate training in modern slavery practices and the appropriate mechanisms to identify and report these internally.
- Commence work to consolidate VicTrack's modern slavery risk requirements into its overall approach to ethical, sustainable procurement practices.
- Review our Modern Slavery policy.

Process of consultation with Subsidiary Companies in preparation of the Modern Slavery Statement

The composition of the Board of each of the Subsidiary Companies is the same composition as the VicTrack Board and so they have been consistently updated on the Modern Slavery strategy.

This statement has been approved by the Board of each of the Subsidiary Companies.

Modern Slavery Act 2018 (Cth) – Statement Annexure

Principal Governing Body Approval

This Modern Slavery statement was approved by the principal governing body of Victorian Rail Track Corporation (VicTrack) and its subsidiaries as defined by the *Modern Slavery Act 2018* (Cth)⁴ ("the Act");

Approved by the VicTrack Board of Directors on 1 December 2025.

Approved by the Rolling Stock Holdings (Victoria) Pty Limited Board of Directors on 1 December 2025.

Approved by the Rolling Stock (Victoria – VL) Pty Limited Board of Directors on 1 December 2025.

Approved by the Rolling Stock (VL-1) Pty Ltd Board of Directors on 1 December 2025.

Approved by the Rolling Stock (VL-2) Pty Ltd Board of Directors on 1 December 2025.

Approved by the Rolling Stock (VL-3) Pty Ltd Board of Directors on 1 December 2025.

Signature of Responsible Member

This Modern Slavery statement is signed by a responsible member of Victorian Rail Track Corporation (VicTrack) as defined by the Act⁵:



Paul Hardy

Chair | VicTrack

⁴ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph — a prescribed body within the entity, or a prescribed member or members of the entity.

⁵ Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee —that trustee; or (c) if the entity is a corporation sole —the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001 —the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph —a prescribed member of the entity.

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	3: Our business 4: Our organisational structure 6: Our supply chain
c) Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7: Modern Slavery risks in our operations and supply chains (including our subsidiaries)
d) 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.	11: Actions taken (including by subsidiaries) to assess and address those risks, including due diligence and remediation processes
e) Describe how the reporting entity assesses the effectiveness of these actions.	11: How the organisation assesses the effectiveness of the actions taken
f) 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).*	11: Process of consultation with subsidiary entities in preparation of the Modern Slavery Statement
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

VicTrack

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