

Modern Slavery Statement

Financial Year 2024/2025

An MTR, John Holland and UGL Company



“Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- *human trafficking*
- *slavery*
- *servitude*
- *forced labour*
- *debt bondage*
- *forced marriage, and*
- *the worst forms of child labour”*

Australian Government, Department of Home Affairs¹

¹ <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>

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1. About Metro Trains Australia Pty Ltd

Metro Trains Australia Pty Ltd (MTA) is a consortium of rail and construction businesses. Our shareholders are MTR Corporation, John Holland Group and UGL Rail.

MTA operates the Rail Industry Worker (RIW) Program which is an online national competency management system for Australian rail workers and operators. It ensures rail safety workers working within the rail industry are competent to do so.

The RIW Program is owned and endorsed by the Australasian Railway Association. MTA commenced operating the RIW Program in June 2019.

MTA also operates the AHP Program which acts as the central hub for Australian Chief Medical Officers, Authorised Health Professionals (AHPs) and Rail Network Operators to efficiently manage the scheduling and training of prospective AHPs, as well as identifying certified AHPs to conduct medical assessments for rail workers.

MTA also provides consultancy services to the rail industry.

1.1 Consultation with Metro Trains Melbourne Pty Ltd

MTA is the holding company of Metro Trains Melbourne Pty Ltd (**Metro**). Metro operates and maintains the metropolitan rail service in Melbourne on behalf of the State Government of Victoria.

With a fleet of more than 269 trains operating across nearly 1,000 kilometres of track, Metro works as a unified team to provide safe, reliable train services and an exceptional passenger experience for both Victorians and visitors to Melbourne.

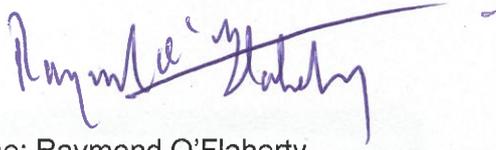
The network comprises 16 lines and 222 stations. Metro delivers thousands of services every day, seven days a week, moving hundreds of thousands of passengers. The organisation employs approximately 7,000 people, including train drivers, station staff, engineers, signallers, and network controllers, all from diverse backgrounds and fields of expertise.

Metro has submitted a separate Modern Slavery Statement for Financial Year 2024/2025.

MTA and Metro have undertaken a collaborative approach to the development of their respective Modern Slavery Statements in order to combat modern slavery. Through this collaborative approach MTA has been able to ensure that appropriate action is being taken by MTA and Metro to identify, assess and address the modern slavery risks relating to each entity.

This consultation has occurred through regular meetings between executives and senior managers of MTA and Metro's procurement, assurance and legal teams and briefings to the Board of Directors of each entity.

This Modern Slavery Statement was approved by the Board of Metro Trains Australia Pty Ltd on 10 December 2025.



Name: Raymond O'Flaherty
Position: Director and Chief Executive Officer



2. MTA operations and supply chain

2.1 Operations

RIW Program

The RIW Program supports the rail industry by giving participant organisations full visibility of workers moving between projects and employers. It maintains a single electronic record of a worker's job roles, competencies, education and fitness for work. This ensures that work is carried out by qualified people, enhancing overall safety on rail networks across Australia to meet the requirements of Rail Safety National Law.



In summary, the RIW Program includes:

- Physical access control to worksites
- Competency management and verification services
- E-Learning
- ID checks
- Fatigue management
- Job Ready which includes services to assist workers obtain their initial RIW card

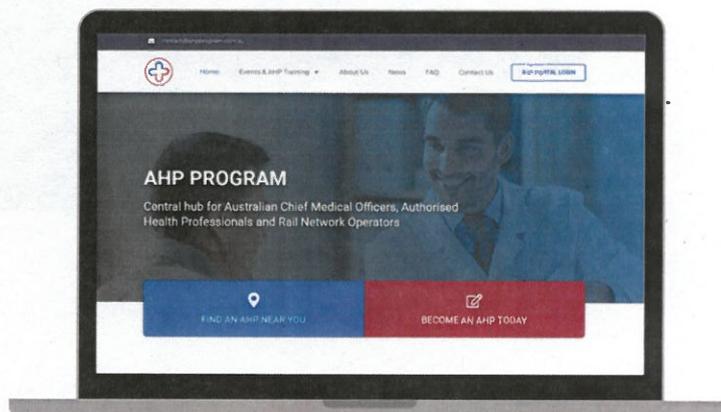
AHP Program

MTA and the Rail Industry Safety Standards Board (**RISSB**) worked together to develop the AHP Program that provides professional administration of the AHP Program.

The AHP Program facilitates the scheduling and training of AHPs and identifies certified AHPs to conduct medical assessments for rail workers.

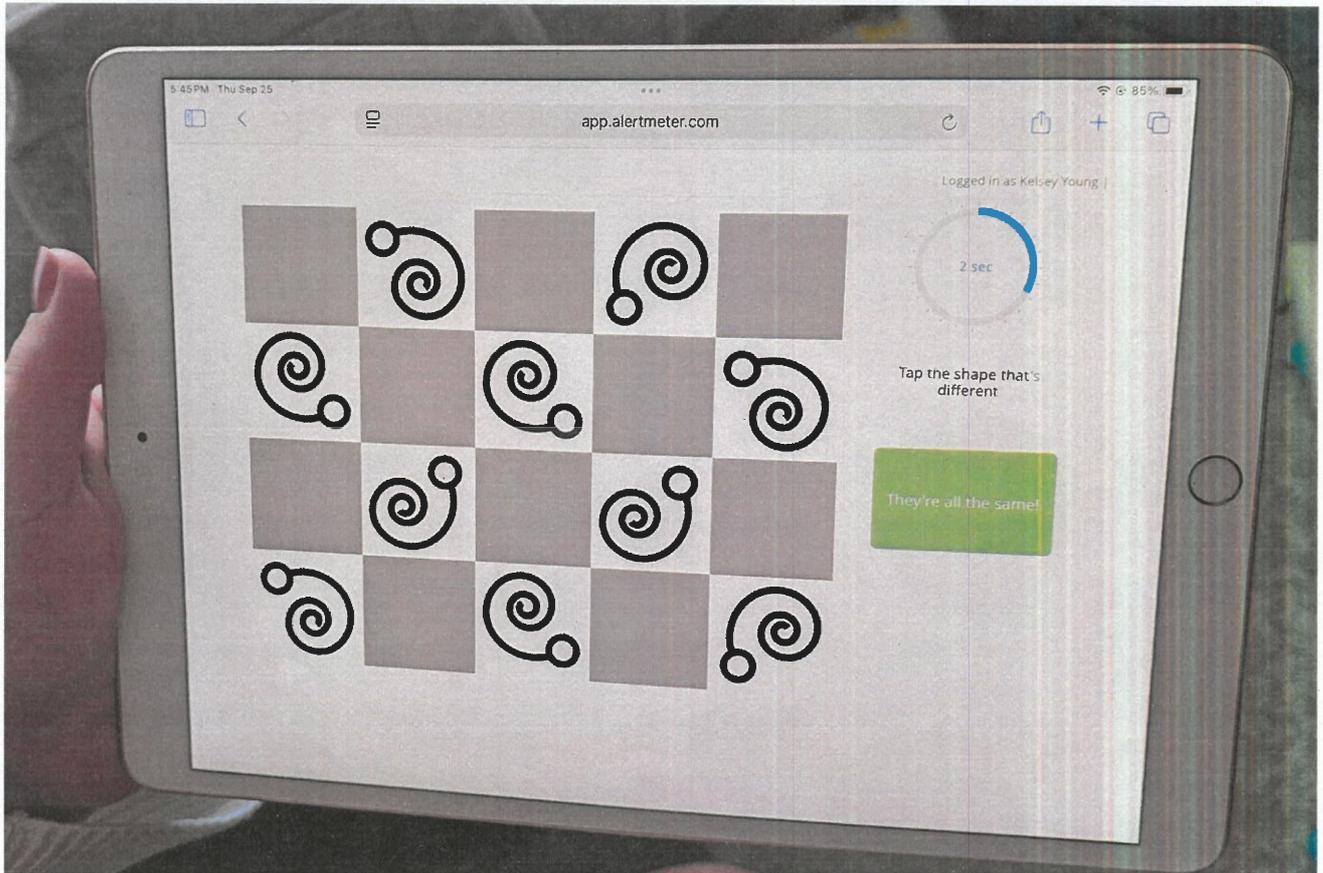
To be able to conduct assessments under the National Standard for Health Assessment of Rail Safety Workers, AHPs will need to carry out mandatory training and register with the AHP Program.

The AHP Program provides a low maintenance, easily accessible and up-to-date directory of participating AHPs.



Fatigue Alert

MTA also has Fatigue Alert which is a fatigue management and impairment detection testing system.



Registered Training Organisation

MTA is establishing a Registered Training Organisation that will provide E-learning training for accredited and non-accredited rail courses with a particular focus in the health and safety area. MTA is committed to delivery in accordance with Australian Skills Quality Authority (**ASQA**) framework.

MTA is also the training provider for the Victorian Infrastructure Delivery Authority's (**VIDA**) Signalling Strategic Taskforce Training Program.

Consultancy Services

Consultancy services are also provided by MTA to the rail industry, including health check assessments.

MTA has a core team of employees from diverse backgrounds who have specialist knowledge and experience in areas such as management and delivery of assurance services, competency management, rail safety, learning and development, account management, information technology, cyber security, communications, finance and legal.

2.2 Supply chain

MTA has engaged a number of suppliers to deliver the overall RIW Program and these are shown in Figure 1 below:

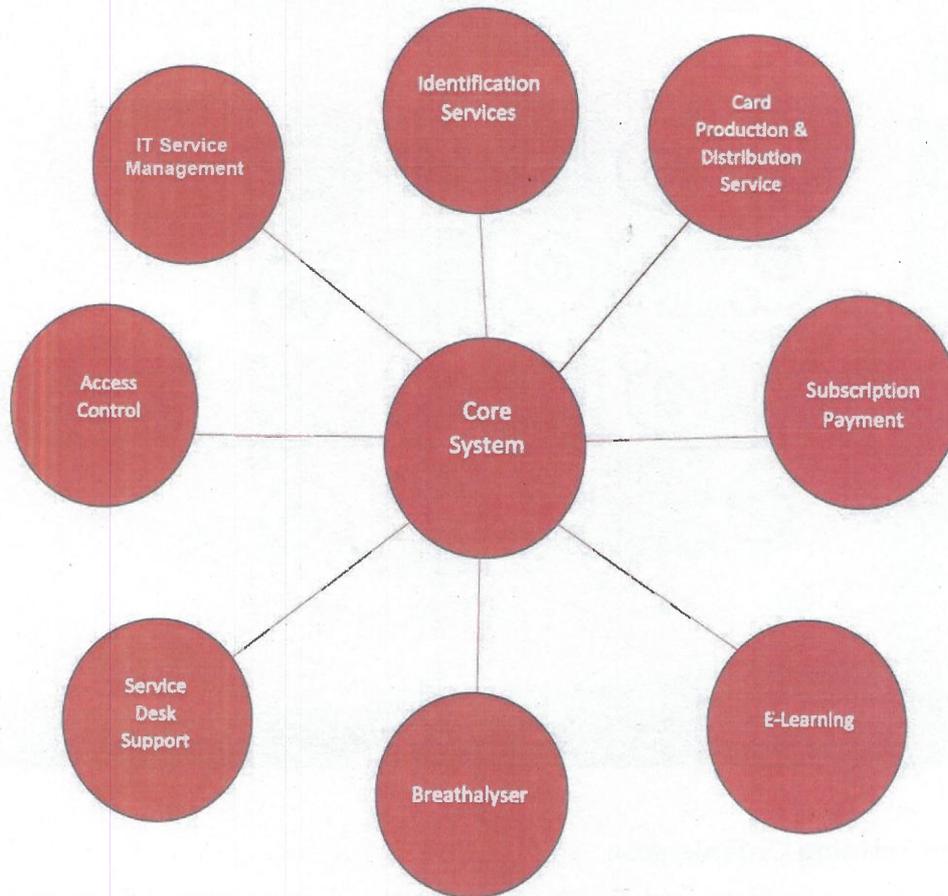


Figure 1: RIW Program – Goods and Services provided by Suppliers

MTA also engages specialist consultants to assist with the provision of training and consultancy services and suppliers for banking, insurance, travel, telecommunications and legal services.

Our supply chain is predominantly drawn from Australia, the United Kingdom and the United States of America. Where MTA sources products and services from overseas, these are mainly specialised technical products and services such as software development, IT service management and IT equipment.

3. Our approach

3.1 Operational risks

Due to MTA's localised operational structure and the fact that all employees are professionals engaged under common law contracts providing all legal entitlements and requirements, modern slavery risks are perceived to be low within our organisation.

MTA's executives oversee all recruitment with assistance from human resource specialists. All salaries are benchmarked annually using industry data to ensure equitable remuneration for employees.

A range of measures continue to be implemented to help support the safety and wellbeing of our employees including:

- Greater flexibility is provided for employees who are required to work outside of standard business hours;
- Employees are encouraged to continue to take annual leave as an important wellbeing measure;
- Regular meetings occur via video conference to ensure employees remain connected and supported by peers and managers; and
- A "Staying Connected" wellbeing program is provided by Metro and is available to all employees. We have also consistently encouraged employees to reach out to our Employee Assistance Program (EAP) if they, or family members, feel extra support is needed.

3.2 Supply chain risks

High-risk categories of services identified are typically engaged in manual tasks that do not require qualified professionals. This includes non-technical or skilled labour hire providers such as service desk providers. These personnel are often without union representation or Enterprise Agreements and/or from disadvantaged backgrounds (as defined by the Victorian Government Disadvantaged Workers Strategy). These factors have the potential for unsafe work practices or exploitation.

With advancements in technology and the global shift toward remote work, emerging risks have been identified in locally sourced and offshore resources providing IT software and support services. In such cases, employment conditions may be obscured, making it difficult to assess labour standards and compliance.

High-risk categories for goods, materials and spare parts are goods manufactured or sourced from overseas suppliers and categories where imported or manufactured raw materials or components are used. This is particularly for suppliers without strong company policies and procedures or sourced from high risk countries as defined by the Global Slavery Index².

MTA primarily has visibility of its first tier suppliers via its Vendor Management Framework which is embedded in the business.

² <https://www.globallslaveryindex.org/>

4. Actions

4.1 New initiatives

MTA continues to advance its modern slavery initiatives via its Vendor Management Framework while implementing ongoing measures across its operations and supply chain. The 2024/2025 financial year represents a period of learning and strengthening MTA's approach to managing supply chain risks related to modern slavery, alongside the continuation and enhancement of existing practices. Key actions undertaken include:

- As part of MTA's commitment to fostering a safe, inclusive, and respectful workplace, MTA conducted regular employee happiness pulse check surveys during the year and appointed a diverse team of four well-being support officers to give MTA staff the opportunity to reach out to someone they feel most comfortable with to discuss any issues.
- The Metro Corporate Group Modern Slavery Network comprising senior leadership from MTA's related entities was established enabling MTA to collaborate, share insights and learn from other rail operators. The Group supports the progression of modern slavery initiatives and ensures alignment within the Group.
- MTA developed and implemented its Modern Slavery Policy. This policy outlines MTA's commitment to preventing modern slavery and human trafficking in all aspects of our business activities. It also enhances internal employees' awareness and provides clarity on MTA's approach and measures implemented to address modern slavery risks within the supply chain.
- Desktop benchmarking was conducted with Australian-based rail operators. By reviewing their most recent Modern Slavery Statements, MTA identified areas for improvement and gathered ideas for future initiatives.
- MTA's Enterprise Risk Register is regularly reviewed and updated to better support contract managers in allocating appropriate contract management and risk management effort, including people related risk.

4.2 Managing risks within MTA's Operations – on-going practices

On-going risk management practices include:

- MTA continues to submit its annual Modern Slavery Statement to the Government's online register.
- MTA has continued to embed its Vendor Management Framework to strengthen contract and supplier management in MTA. The Vendor Management Framework outlines the management approach, structure and principles for supervising MTA's suppliers, including business operations service providers and ICT. It also outlines the context of the MTA Vendor Management function, vendors, scope, key activities and alignment with other frameworks and processes.
- Documented guidance provided for due diligence of sourcing processes covers considerations of risk and detection of modern slavery. This is undertaken prior to contract award and aims to ensure MTA only engages reliable and capable suppliers of good repute and integrity.

- External compliance audits continued to be conducted for MTA's key suppliers and no material non-conformances were identified.
- MTA's Anti-Fraud Policy and Anti-Corruption Policy are in place to ensure all MTA employees and contractors are engaged to act in MTA's business interests and abide by MTA's policies and procedures.
- MTA has established policies to support wellbeing, including MTA's Code of Conduct / Workplace Behaviour Policy and Equity and Diversity in the Workplace Policy.
- Wellbeing programs and Employee Assistance Programs are made available to support employees.
- Whistleblowing and complaint channels are available to both internal and external stakeholders.



4.3 Managing risks within MTA's Supply Chain – on-going practices

On-going risk management practices include:

- MTA's Vendor Management Framework is in place which sets the standard for MTA's procurement and contract management approach and to provide structured support and governance for post-contract activities. It covers the requirements to monitor and mitigate risks including risks associated with people, privacy, security, subcontracting, etc. throughout the contract life cycle.
- Formal monthly review meetings with MTA's suppliers to maintain good communication and be ready to work with suppliers in resolving issues as they arise. These meetings include the review and monitoring of supplier SLA's and KPI's and the provision of MTA's forecasts and requirements to suppliers to provide greater visibility into MTA's business operations.
- Ongoing supplier risk reviews have also been implemented and are conducted each quarter or bi-annually depending on the criticality of the supplier to MTA's business. All risks are recorded, monitored and mitigation actions agreed with the supplier.
- Documented guidance for due diligence in sourcing processes includes considerations for identifying and mitigating modern slavery risks. This is conducted prior to contract award to ensure MTA engages only reliable and reputable suppliers with demonstrated integrity.
- MTA's supplier on-boarding and ongoing monitoring processes via its Vendor Management Framework assess a supplier's OH&S statistics, offences pending resolution, labour hire licence and subcontractor management where applicable.
- The collection of information on suppliers' compliance with the Modern Slavery Act and the source countries of goods and services supplied to MTA. This process also raises awareness of modern slavery obligations among new suppliers.
- Sourcing and procurement processes for high-risk categories include restrictions on subcontracting of works, assessment of labour cost and rates, review of past and current offences or pending litigation and evaluation of corporate policies related to worker welfare.
- MTA's standard contract templates include provisions that restrict subcontracting, grant audit rights and require reporting on labour hours and pay. These measures support compliance and contribute to MTA's efforts to prevent modern slavery.
- Capturing lessons learnt from uncovering and remediating irregularities to take into consideration during future sourcing and contract management activities.

5. Assessing Effectiveness

MTA has been focusing on the development and implementation of the Modern Slavery Policy and continuing to embed the Vendor Management Framework. MTA's processes to review the effectiveness of measures in place will continue to develop in the coming years.

During the reporting period, MTA undertook the following activities to assess and strengthen its approach:

- We continue to have positive outcomes with suppliers including through the implementation of the Vendor Management Framework and our regular review meetings. Ethical labour and anti-modern slavery clauses continue to be embedded into existing and new contracts. MTA will continue to look to reduce any impact on vulnerable workers in future supplier changeovers which impact major labour related categories.
- Learnings and ideas from other organisations, including via the Metro Corporate Group Modern Slavery Network, help with confirming and adjusting MTA's approach to managing modern slavery risks. This includes reviewing and updating our own policies, processes and frameworks as we progress.
- MTA has raised awareness of the Modern Slavery Act across the majority of MTA's supplier base via its Vendor Management Framework and continue to gather valuable data on source countries of goods and services procured by MTA.
- MTA's suppliers are covered by a cyclical audit program and follow-ups on any significant findings. Audit findings and lessons learnt from contract management and monitoring will continue to improve compliance and quality of records maintained by MTA's suppliers. No material issues or non-conformances have been identified via audits or contract management processes. MTA has incorporated lessons learnt into its procurement practices and contractual requirements for its suppliers to promote alignment in ethical sourcing and an increased accessibility of records for audit. Improvements have also been observed via the willingness of suppliers to accept ethical labour and anti-modern slavery contract clauses and more transparency and co-operation with audit requests and provision of records, as well as quality and timeliness of records provided.
- Restrictions on sub-contracting of works has reduced risks of sham contracting and improved job security of workers, especially for labour intensive services contracts.

6. Looking Forward

MTA will progress its endorsed multi-year roadmap with best endeavours, guided by the adapted principles that support a structured and strategic approach to managing modern slavery risks.

MTA will continue reviewing and updating its policies, processes and frameworks for an aligned and consistent approach toward labour and human rights matters in conjunction with the Metro Corporate Group Modern Slavery Network.

It has been identified via the supplier risk review meetings that all of MTA's suppliers practice proactive risk management. These practices will continue to be monitored and audited by MTA. In the event that any issues are identified, a plan for remediation will be put in place and its progress will be tracked by either a MTA contract manager or an independent auditor. Termination of that supplier, while possible, is not the preferred outcome as this can lead to unintended consequences back through that supplier's chain.

Efforts to raise awareness and strengthen the prevention, detection, and response to modern slavery will be ongoing. This includes the development and distribution of toolkits to equip MTA employees with the knowledge and resources needed to identify and address modern slavery risks effectively.

MTA remains committed to reinforcing modern slavery obligations with its suppliers and will encourage the adoption of proactive risk management practices where appropriate.



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