



Modern Slavery Statement

2023

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This statement is submitted as a joint statement in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**). It is submitted by Engenco Ltd (ACN 120 432 144) (**Engenco**) on behalf of itself and its wholly owned Australian subsidiaries (**Engenco Group**). It describes the steps taken by the Engenco Group to assess modern slavery risks in its operations and supply chain during the financial year ending 30 June 2023 (**FY23**). Although **not all** Engenco subsidiaries are required to report under the Act, the Engenco Group has decided to nonetheless include a voluntary report of its subsidiaries' actions in this joint statement for completeness and consistency as all entities in the Engenco Group have employed the same approach to combating modern slavery. This statement was prepared in consultation with management and supply chain personnel from each reporting entity within the Engenco Group.



ABOUT THE ENGENCO GROUP

The Engenco Group provides a diverse range of innovative products and solutions for transportation. Employing over 500 people (full-time equivalent) in over twenty locations in two countries.

The Engenco Group are a national transport services business with proven capability around Australia with well-established facilities and strong relationships with our industry leading customers. Across the Group we strive to source, develop, and adapt products and services that help increase our customers' competitiveness and efficiency.

Through the Group's three business streams: Power and Propulsion, Rail, and Workforce Solutions the Engenco businesses provide high-quality transportation products and solutions for customers in the defence, resources, marine, power generation, rail, heavy industrial, mining and infrastructure industries.

With a strong focus on customer service and providing sustainable solutions, and superior value for our customers the Group specialises in:

- Maintenance, repair and overhaul of heavy-duty engines, powertrain, propulsion, and gas compression systems;
- Design and manufacture of road and rail transportation and storage tankers, for dry bulk products;
- Product development, manufacture, installation, maintenance and spare parts services for Hedemora Turbochargers and Hedemora Diesel Engines, for customers in all parts of the world;
- Maintenance, repair, and overhaul of locomotives;
- Rollingstock manufacture, maintenance, products, and services for the Australian and New Zealand rail markets;
- Nationally accredited training, contract labour solutions and outsourced workforce management for the Australian Rail and transportation industries.

The Engenco Group entities covered by this statement include:

- Drivetrain Australia Pty Ltd (ACN 060 704 789)
- Convair Engineering Pty Ltd (ACN 058 868 134)
- Gemco Rail Pty Ltd (ACN 079 764 444)
- Total Momentum Pty Ltd (ACN 109 979 991)
- Centre for Excellence in Rail Training Pty Ltd (ACN 104 577 933)
- Eureka 4WD Training Pty Ltd (ACN 150 816 578)

OUR GOVERNANCE AND POLICY FRAMEWORK

The Engenco Group is committed to ethical business practices with the health, safety and wellbeing of our staff, customers and supply partners as our number one priority. Our commitment to these principles is embodied in our Code of Conduct and underpinned by our Values.

Engenco has a Risk Management Policy which is aligned with our business operational activities and in accordance with the Corporate Governance Statement.

Our policy and governance framework supports our commitment to assessing and addressing the risk of modern slavery in our operations and supply chains.

Inspired people
creating
sustainable
transportation
solutions.

Engenco Group Values



Integrity

The power of honesty



Commitment

The power of responsibility



Collaboration

The power of working together



Excellence

The power of quality

- Our **Code of Conduct** sets out the principles and standards with which all officers and employees of the Engenco Group are expected to comply in the performance of their duties.
- Our **Whistleblower Policy** supports staff and suppliers to report any actual or suspected illegal or unethical conduct within the Engenco Group.
- Our **Modern Slavery Policy** provides the framework for how the Engenco Group will assess and address modern slavery in its operations and supply chains.
- Our **Anti-Bribery and Corruption Policy** outlines the responsibilities of the Engenco Group and its personnel in observing and upholding prohibition on bribery and related improper conduct.
- Our **Supplier Code of Conduct** outlines the expectations for ethical business practices that the Engenco Group has for its suppliers, including expectations for suppliers to investigate, assess and address the risks of modern slavery within their own operations and supply chains.

Copies of these and other policies can be found on our website at www.engenco.com.au/investor-center/governance/.

STRUCTURE, BUSINESS OPERATIONS AND SUPPLY CHAINS

ENGENCO LIMITED

Engenco is a publicly listed company (ASX: EGN) with its registered office at Level 22, 535 Bourke Street, Melbourne, Victoria 3000. Engenco provides corporate shared services to the Engenco Group entities. Corporate shared services are comprised of finance, legal, human resources, marketing, information technology and general administration functions. Engenco employs approximately 60 people at its corporate offices in Melbourne (Victoria), Welshpool (Western Australia) and Forrestfield (Western Australia).

In addition to the Engenco Group entities covered by this statement, Engenco also owns Hedemora Turbo and Diesel AB, a company incorporated in Sweden, and HS Turbochargers America, Inc, a company incorporated in the State of Nevada, United States of America.

Engenco has a decentralised procurement function with each entity largely responsible for engaging and managing their own suppliers. Suppliers to Engenco consist mainly of professional advisory services (legal services, auditing and financial services), fleet management services, recruitment services, contract labour hire and office cleaning services.

DRIVETRAIN AUSTRALIA PTY LTD (DRIVETRAIN)

Drivetrain is a proprietary limited company wholly owned by Drivetrain Power and Propulsion Pty Ltd (ACN 052 506 886) (DTTP). DTTP is a non-trading holding company wholly owned by Engenco. Drivetrain's registered address is Level 22, 535 Bourke Street, Melbourne, Victoria 3000 and its principal place of business is 13 Firebrick Drive, Thornton, New South Wales 2322. Drivetrain employs approximately 100 people at its workshops across Australia.

Drivetrain is a leading supplier of technical products and services to the mining, energy, transport and defence industries. From its workshops located in Victoria, New South Wales, Queensland, South Australia and Western Australia, Drivetrain provides engineering, maintenance, repair and overhaul services on driveline components, utility vehicles and other equipment.

Drivetrain has stable, long-term supply agreements with its major suppliers. Drivetrain acts as the Australian distributor for manufacturers located in Canada, Sweden, Germany, the United States of America and Australia.

Drivetrain's supply chain is managed by a centralised team lead by an experienced Strategic Supply Chain Manager.

CONVAIR ENGINEERING PTY LTD (CONVAIR)

Convair is a proprietary limited company wholly owned by Engenco with its registered office at Level 22, 535 Bourke Street, Melbourne, Victoria 3000. Its principal place of business and manufacturing facility is located at 93 Miller Street, Epping, Victoria 3076. Convair employs approximately 40 people at its Epping facility.

Convair specialises in the manufacture, supply and service of pneumatic dry bulk tankers.

Convair has a stable, long-term supply chain consisting of local Australian and international suppliers. Convair is the Australia/New Zealand agent for aluminium pneumatic dry bulk tankers manufactured in Germany by Feldbinder Spezialfahrzeugwerke GmbH. Convair is also the national distribution agent for several ancillary parts manufacturers from Germany and the United States of America.

Convair's supply chain is managed by a dedicated Procurement Manager.

GEMCO RAIL PTY LTD (GEMCO RAIL)

Gemco Rail is a proprietary limited company wholly owned by Engenco with its registered office at Level 22, 535 Bourke Street, Melbourne, Victoria 3000. Its principal place of business is 860-870 Abernethy Road, Forrestfield, Western Australia 6058. Gemco Rail employs approximately 230 people across Australia with key operations in Forrestfield (Western Australia), Dynon (Victoria), Telarah (New South Wales) and Gladstone (Queensland).

Gemco Rail specialises in providing fleet-management services to Australian rail operators and in the manufacture, refurbishment and overhaul of rail rollingstock and other rail equipment.

Gemco has strategic partnership agreements and/or long-standing relationships with rail part suppliers in the United States of America and Australia. Gemco also procures industrial products (e.g. oil and grease) and electrical services, engineering services and recruitment services from Australian suppliers.

Gemco Rail has a dedicated supply chain team lead by an experienced National Supply Chain Manager.

TOTAL MOMENTUM PTY LTD (MOMENTUM)

Momentum is a proprietary limited company wholly owned by Engenco with its registered office at Level 22, 535 Bourke Street, Melbourne, Victoria 3000. Momentum employs approximately 95 people across Australia.

Momentum is a leading provider of contract labour solutions and outsourced workforce management to the Australian rail industry. Momentum operates nationally within Australia delivering skilled staff to rail operators and infrastructure owners.

Momentum procures accommodation services from local Australian hoteliers in addition to equipment and services from Australian-based suppliers.

CENTRE FOR EXCELLENCE IN RAIL TRAINING (CERT)

CERT is a proprietary limited company wholly owned by Engenco Investments Pty Ltd (ACN 124 975 462) (**Engenco Investments**). Engenco Investments is a non-trading holding company wholly owned by Engenco. CERT's registered address is Level 22, 535 Bourke Street, Melbourne, Victoria 3000. CERT employs approximately 50 people across Australia.

CERT is a nationally registered training organisation (**RTO**), primarily delivering nationally accredited qualifications and industry compliance programs to the Australian transport, resource and defence markets. CERT operates across Australia delivering a range of training options, including classroom, on-site, distant and remote learning.

CERT's key suppliers are Australian-based equipment and service providers. CERT has a long-term supply agreement in place with a medical services provider to perform rail and other workplace medicals. Other long-term suppliers include heavy equipment hire (forklifts and cranes) for high-risk training courses.

EUREKA 4WD TRAINING PTY LTD (EUREKA)

Eureka is a proprietary limited company wholly owned by Engenco Investments Pty Ltd (ACN 124 975 462) (**Engenco Investments**). Engenco Investments is a non-trading holding company wholly owned by Engenco. Eureka's registered address is Level 22, 535 Bourke Street, Melbourne, Victoria 3000 and its principal place of business is 77A Great Eastern Highway, Bellevue, Western Australia 6056. Eureka employs approximately 15 people at its offices in Western Australia.

Eureka is a nationally registered training organisation (**RTO**), delivering nationally accredited 4WD and truck driving qualifications to commercial and individual customers. Eureka operates in Western Australia.

Eureka's key suppliers are Australian-based equipment and service providers.

IDENTIFYING AND ADDRESSING MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

The Engenco Group considers the risk of modern slavery in its operations to be very low. All direct employees of the Engenco Group are engaged under written contracts of employment on terms and conditions that are in accordance with Australian legislation, and any applicable modern awards or enterprise agreements. The Engenco Group has policies, procedures and resources to ensure compliance with relevant laws, including with respect to employee pay and entitlements. Our Code of Conduct ensures that employees are treated fairly and our Whistleblower Policy supports staff and suppliers to report any actual or suspected illegal or unethical conduct within the Engenco Group.

In FY23, the Engenco Group's Modern Slavery Working Group (**Working Group**) continued to inform and drive implementation of the Engenco Group's response to modern slavery within our supply chain. The Working Group consists of supply chain representatives from all reporting entities as well as representatives from the finance and legal department.

To continue to address and mitigate the risk of modern slavery in its supply chain, each entity within the Engenco Group continued to assess its top suppliers (by spend) against the framework and continued to engage with suppliers through our supplier questionnaires. A Group wide Supplier Application and Questionnaire is currently under review, to provide consistency for vendor engagement, across the Group.

Most suppliers were assessed to be at low risk of modern slavery due to being either local Australian-based companies or large international companies based in countries with a low prevalence of and high government response to modern slavery.¹ While the overall risk assessment of the Engenco Group's top suppliers was low, it was noted that some medium country-level risks may exist with a small number of suppliers whose products are ultimately manufactured in third-country locations with a medium prevalence of and vulnerability to modern slavery.²

1 According to the Global Slavery Index 2023 published by the Walk Free Foundation (www.globalslaveryindex.org).

2 Ibid.

ASSESSING EFFECTIVENESS

The Engenco Group remains focused on identifying and addressing modern slavery in our operations and supply chains. Throughout FY23 our procurement professionals were committed to enhancing their understanding of the prevalence of modern slavery and the actions we can take to minimise the risk of it in our supply chain, supported through our due diligence approach for on-boarding new suppliers. Furthermore we continued to engage with our top suppliers (by spend) through our supplier questionnaire and follow-up actions that arise therefrom.

The Engenco Group is not aware of any instances of modern slavery in its operations or supply chain during FY23; nonetheless, it remains committed to the continued improvement of its systems, processes and actions to identify, assess and address modern slavery in its businesses.

LOOKING AHEAD

PRIORITIES FOR FY24

Our key priorities for the financial year ending 30 June 2024 (**FY24**) include:

- Roll-out of a standardised procurement process, ensuring all vendors complete our supplier questionnaire, to assist in identifying any potential risks across the Engenco Group entities; and
- A modern slavery awareness training program in the form of an e-learning module to be rolled out to those employees involved in procurement and supply chain decisions to raise awareness on how to identify signs of modern slavery and how to report an incident or raise any concerns.
- Development of a supply chain audit program, to effectively review our supply chain and identify opportunities for improvement.

Approval

The Board of Engenco Limited has approved this statement on behalf of the Engenco Group on 19 December 2023.



Vince De Santis

Chairman - Engenco Limited

ANNEXURE – MANDATORY CRITERIA

The table below indicates the page number(s) of the Engenco Group's statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page Number (s)
a) Identify the reporting entity	2
b) Describe the reporting entity's structure, operations and supply chains	3, 5, 6, 7
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls.	5, 6, 7
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.	7
e) Describe how the reporting entity assesses the effectiveness of these actions.	8
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).	2
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	3, 4, 8

Engenco

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