

MODERN SLAVERY STATEMENT 2024

NGR PROJECT COMPANY PTY LTD
ON BEHALF OF THE NGR GROUP



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1. Introduction

This Joint Modern Slavery Statement 2024 (**Statement**) is made on behalf of NGR Project Company Pty Ltd atf NGR Project Trust in accordance with the requirements of the Australian Commonwealth Modern Slavery Act 2018 (*Cth*) (**Modern Slavery Act**) for the financial year ended 30 June 2024 (FY2024) (**Reporting Period**).

This is the fifth statement provided by NGR Project Company Pty Ltd atf NGR Project Trust under the Modern Slavery Act. The Statement covers the following entities:

- NGR Project Company Pty Ltd (ACN 166 706 332);
- NGR Project Trust (ABN 39 281 214 407);
- NGR Holding Company Pty Ltd (ACN 166 705 326);
- NGR Hold Trust (ABN 67 389 478 992);
- NGR Finance Holding Company Pty Ltd (ACN 167 241 223); and
- NGR Finance Pty Ltd (ACN 165 031 612).

(together, **Qtectic** or **NGR Group**), each of which is a reporting entity under the Act.

The Statement outlines and reviews our approach to addressing modern slavery risks in our operations and supply chain. It describes the frameworks and processes that Qtectic has in place to minimise the risk of modern slavery in our business operations and supply chain.

We recognise that modern slavery can occur in many forms. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services. Given the global prevalence of modern slavery, we acknowledge the risk of modern slavery practices in our operations and supply chains. Qtectic is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our business. Qtectic is also committed to understanding and minimising the risk of modern slavery in its operations and supply chain.

Qtectic has formed a Modern Slavery Working Group that includes members from Finance and Human Resources and meets regularly with personnel from Operations. Furthermore, members of the Modern Slavery Working Group have engaged with legal and industry experts to keep abreast of learnings and evolving good practice in terms of understanding modern slavery risk, improving management of modern slavery risk, and engaging with our stakeholders including our Sponsors.

A summary of the actions Qtectic completed in FY2024 and our planned actions for the financial year ending 30 June 2024 are presented on pages 8 to 15 of this Statement.

2. Our Business

Qtectic is a special purpose entity established to execute the New Generation Rollingstock Project (**NGR Project**) for the State of Queensland acting through the Department of Transport and Main Roads (**TMR**).

The NGR Project is being delivered under a public private partnership model, and through this contract, the NGR Project consists of the following elements:

- Delivery of 75 new six-car passenger electric trains (Multiple Units);
- A purpose-built maintenance facility at Wulkuraka, Brisbane which includes a maintenance building, administration offices, decanting facilities, signalling yard control and train lifting jacks;
- Three NGR training simulators for train crew;
- Undertaking additional modifications to the Multiple Units to ensure functionality in line with the Disability Standards for Accessible Public Transport 2002 (DSAPT);
- Implementing the European Train Control System requiring the implementation of both on-board and trackside equipment; and
- Implementing Automatic Train Operations and Platform Screen Doors to enable operation within the Cross River Rail tunnel.

The NGR Project includes a concession period for the maintenance of the Multiple Units until January 2046.

In undertaking the NGR Project, Qtectic:

- Subcontracted the design, manufacture, supply, testing and delivery of the Multiple Units and other related equipment (including Simulators) to a joint venture between Alstom Transport Australia Pty Ltd and IIIQ Pty Ltd (ITOCHU Corporation) (D&D Subcontractor);
- Subcontracted the design, construction, fit out and commissioning of the maintenance facility to the D&D Subcontractor, who in turn subcontracted the design and construction of the maintenance facility to Laing O'Rourke Australia Pty Ltd;
- Subcontracted the provision of availability and maintenance services to Alstom Transport Australia Pty Limited (A&M Subcontractor);
- Subcontracted the implementation of the Disability Standards for Accessible Public Transport modifications to Alstom Transport Australia Pty Ltd (DSAPT Contractor);
- Subcontracted the implementation of the European Train Control System modifications to Alstom Transport Australia Pty Ltd (ETCS Contractor); and
- Subcontracted the implementation of the Automatic Train Operations and Platform Screen Doors modifications to Alstom Transport Australia Pty Ltd (ATO/PSD Contractor).

Qtectic's role is to execute the NGR Project through the performance of its contractual obligations, which are achieved through the management of its subcontract relationships.

In performing that role, Qtectic's objectives are:

- To deliver customer satisfaction by ensuring that the quality of the works undertaken by Qtectic, and its subcontractors meets or exceeds the requirements of the agreement between Qtectic and the State of Queensland;
- To ensure Qtectic and its subcontractors comply with all relevant legislation and contractual obligations;
- To ensure Qtectic and its subcontractors minimise the environmental impacts associated with their activities, so far as is reasonably practicable; and
- To ensure Qtectic and its subcontractors prevent injury and illness to their employees and any other parties who could be affected by the project activities.

3. Our Structure and Operations

Qteclic is a special purpose vehicle established specifically to execute the NGR Project. The following entities hold 100% of the equity in the NGR Group:

- John Laing Investments (NGR) B.V.;
- IIIQ Pty Ltd (Itochu Corporation);
- Aberdeen Infrastructure Investments (NGR) Ltd.; and
- Alstom Transport Australia Pty Ltd.

An overview of the NGR Group structure is outlined (and indicated in orange) below in Figure 1.

NGR Contractual Structure

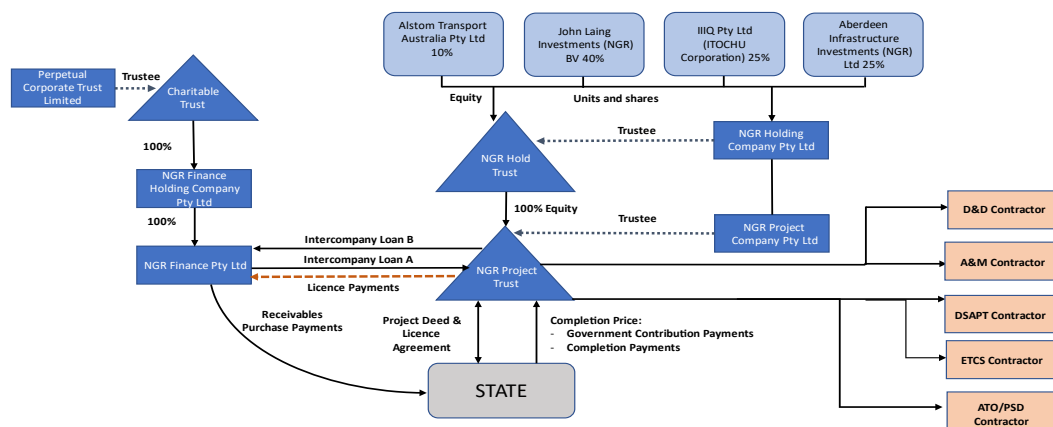


Figure 1 – NGR Contractual Structure

An overview of the NGR Project structure is outlined below in Figure 2.

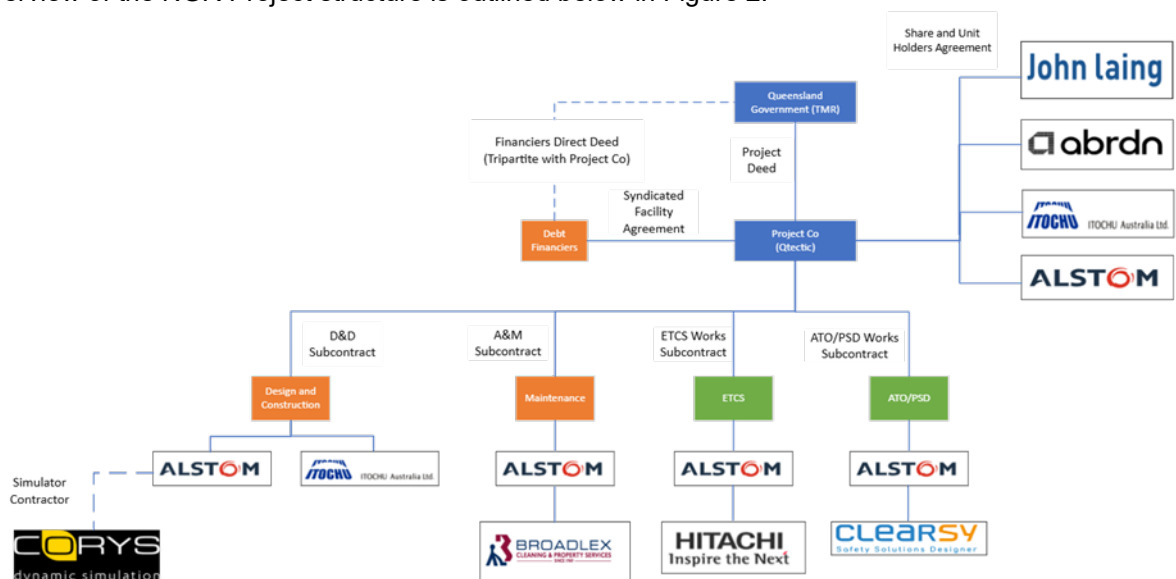


Figure 2 – NGR Project Structure

Qtectic's registered office is in Melbourne, Victoria. As of June 2024, Qtectic employed 24 people who are all based in Queensland, Australia. Of the employees, 21 employees are full-time and three are part-time. Qtectic does not directly utilise any external labour hire organisations.

The key functions and project activities of Qtectic are outlined below in Figure 3:

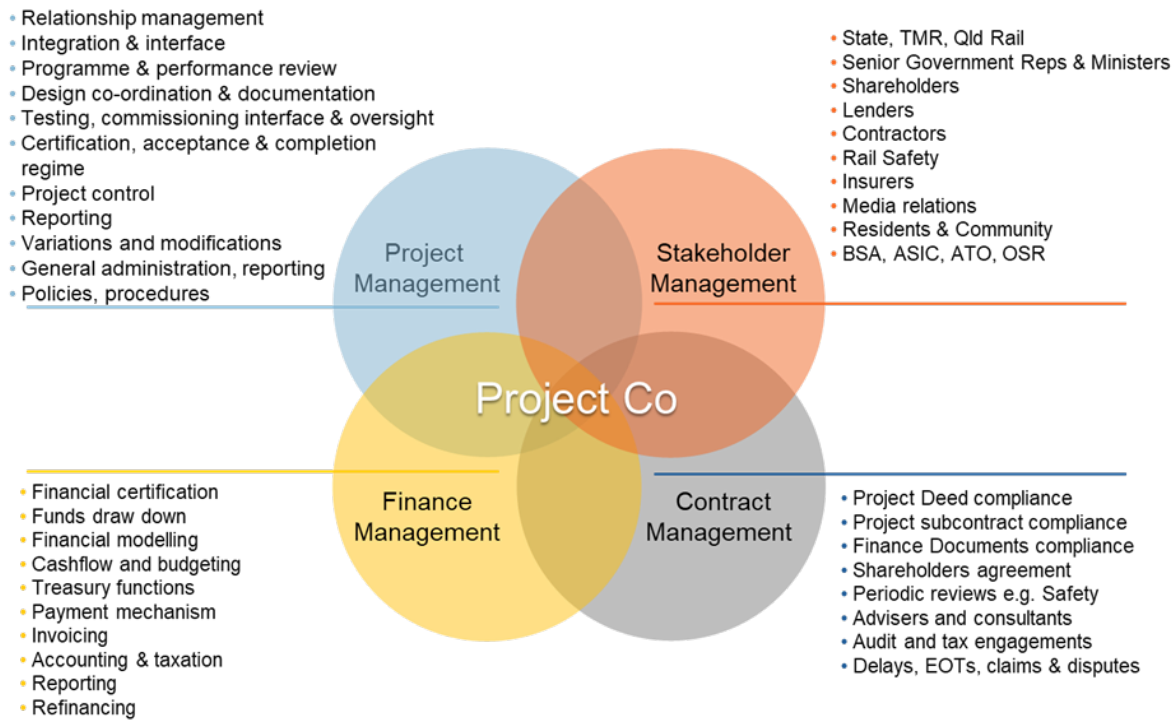


Figure 3 – Key functions and project activities

The NGR Project is delivered by Qtectic in two distinct phases:

Phase 1: Design & Delivery

- Design, manufacture, supply, test, and commission the Initial Fleet of Multiple Units (NGR Fleet) and other related equipment (including Simulators); and
- Design, construct, fit-out and commission of the Wulkuraka Maintenance Facility in Wulkuraka, Queensland.

The design and delivery phase of the Project is now complete.

Phase 2: Availability & Maintenance Services

- Maintenance and overhaul of the NGR Fleet and associated equipment at the Wulkuraka Maintenance Facility and making these available to the State;
- Presentation services including daily cleaning, monthly cleaning and rectification of graffiti and vandalism acts on the NGR Fleet;
- Implementation of the Disability Standards for Accessible Public Transport modifications;
- Implementation of the European Train Control System modifications;
- Implementation of the Automatic Train Operations and Platform Screen Doors modifications; and
- Returning the NGR Fleet, equipment, and the Wulkuraka Maintenance Facility in the return condition on termination or expiry of the concession period.

The availability and maintenance services take place in Wulkuraka, Queensland. The concession period expires in January 2046. NGR Project Company Pty Ltd atf NGR Project Trust is the only entity which engages with external suppliers.

Implementation of the Disability Standards for Accessible Public Transport modifications was completed in July 2024, which was ahead of the contractual completion date.

Implementation of the European Train Control System modifications is progressing, with a target date for Stage One Works Completion of early 2025.

Implementation of the Automatic Train Operations and Platform Screen Doors modifications is progressing, and dynamic testing is expected to be completed by Q3 2025.

4. Our Supply Chain

During the Reporting Period, Qtectic had four direct suppliers and ten indirect suppliers. The direct suppliers provided train manufacturing and rollingstock maintenance services. The indirect suppliers provided a range of goods and services including:

- Simulators
- Train cleaning
- Braking systems
- Seats
- Sidewalls
- Doors
- Floors
- Main circuit
- Fire detection
- Toilets
- ETCS configuration
- ATO/PSD configuration

The majority of Qtectic 's suppliers are located in Australia. A small number of the suppliers are located in India, China, France, Switzerland, Germany, Japan, and Spain, as noted in Table 1 below:

Key Subcontractors:				
Description	Location	Direct or Indirect	Relationship (short term or long term)	Changeable or Stable
Train Manufacturer and Rollingstock maintainer	Global company	Direct	Long term	Stable
DSAPT Subcontractor	Global company	Project Completed	Project Completed	Project Completed
ETCS and ATO/PSD Subcontractor	Global company	Direct	Long term	Stable
Material Subcontractors:				
Description	Location	Direct or Indirect	Relationship (short term or long term)	Changeable or Stable
Simulator manufacturer and maintainer	France	Indirect	Long Term	Stable
Train cleaning services provider	Australia	Indirect	Long Term	Stable
Significant Subcontractors:				
Description	Location	Direct or Indirect	Relationship (short term or long term)	Changeable or Stable
Braking system supplier	Germany	Indirect	Short Term	Changeable
GRP panels throughout train	India	Indirect	Short Term	Changeable
Passenger doors	China	Indirect	Short Term	Changeable
Toilet system (DSAPT)	Spain	Project completed	Project completed	Project completed
Floor covering and intercar doors	Germany	Indirect	Short Term	Changeable
Platform screen doors supplier	France	Indirect	Short Term	Changeable
CCTV provider	Austria	Indirect	Short Term	Changeable
Passenger information system	Melbourne	Indirect	Short Term	Changeable
Pantographs	USA	Indirect	Short Term	Changeable
Wheelset overhaul	Australia	Indirect	Short Term	Changeable

Table 1 – Location of Qtectic Suppliers

5. Modern Slavery Risk in our Operations and Supply Chains

Qtectic conducted an assessment of the modern slavery risk in its operations and supply chain during the year. In addition, internal reviews were conducted by the Modern Slavery Working Group. This included formal meetings with the Qtectic executive leadership team who represent all aspects of the business, and formal meetings with key personnel from the Qtectic subcontractors.

5.1 Operations

Qtectic continues to consider that the risk of modern slavery in its operations is very low. Although Qtectic operates within sectors which are considered to have an elevated risk of modern slavery (i.e., construction, transportation, and cleaning), the following factors are also considered:

- Qtectic's operations are predominantly based in Australia, which has a low prevalence of modern slavery according to the 2023 Global Slavery Index;
- Qtectic's workforce is comprised of permanent employees who are covered under individual contracts. These arrangements have a very low risk of modern slavery as all employees are covered by the National Employment Standards (NES). Qtectic employment contracts not only meet but exceed NES and comply with workplace laws and regulations; and
- Qtectic has policies and procedures in place which are relevant to identifying, assessing and managing modern slavery risk (see section 6.2 below).

5.2 Supply Chain

To assess the modern slavery risk in Qtectic's supply chain, the Modern Slavery Working Group conducted a risk assessment of Qtectic's primary supplier, Alstom (in their roles as D&D Subcontractor, DSAPT Contractor, ETCS Contractor and ATO/PSD Contractor). This included a review of Alstom's Modern Slavery Statement 2024 that was issued on 20 September 2024. Qtectic

considers that the risk of modern slavery in Alstom's operations and supply chain is low. Qtectic identified the following modern slavery risks in respect of Alstom:

- Alstom operates within sectors which are considered to have an elevated risk of modern slavery (i.e., construction, transportation and electronics and electrical products manufacture).
- Alstom produces goods which are considered to be produced with a high risk of modern slavery (i.e., electronics and electrical products).
- Alstom operates in certain countries with a high prevalence of modern slavery according to the 2023 Global Slavery Index, but the majority of countries where Alstom operates have a low prevalence of modern slavery.

Qtectic also reviewed the modern slavery controls that Alstom has implemented, including governance arrangements, supplier code of conduct, policies and commitments, risk management processes, and supplier on-boarding practices, such as corporate social responsibility certification and whistleblowing mechanisms. Based on publicly available information and Alstom's Modern Slavery Statement 2024, it appears that Alstom has effective measures in place to manage modern slavery risks within its operations and supply chain.

Given the identified risks and our knowledge of Alstom's controls, Qtectic considers that Alstom has a low overall risk of modern slavery. Moving forward, Qtectic will continue collaborating with Alstom to better understand its modern slavery risks and evaluate the effectiveness of its controls.

6. Assessing and Addressing Modern Slavery Risks

6.1 Oversight

Qtectic has established a comprehensive governance process to provide Board oversight of its modern slavery risk and ensure compliance with reporting requirements under the Commonwealth Modern Slavery Act. This governance framework includes the key elements noted in Table 2 below:

Element	Description
Modern Slavery Working Group	This group oversees the implementation of modern slavery policies and procedures, regularly reviewing and updating them to ensure effectiveness and compliance. It reports directly to the Board, providing updates on modern slavery risks and controls.
Governance Arrangements	Qtectic includes regular audits and reviews of modern slavery practices in its governance framework. This ensures continuous improvement and adherence to standards. Governance arrangements assign specific roles and responsibilities, ensuring accountability and transparency.
Supplier Code of Conduct	Qtectic requires all suppliers to follow a stringent code of conduct that includes commitments to prevent modern slavery. The code is regularly reviewed and updated to reflect best practices and regulatory changes.

Policies and Commitments	Qtectic has robust policies and commitments to combat modern slavery, including procedures for identifying and mitigating risks, as well as commitments to ethical sourcing and labour practices.
Risk Management Processes	Qtectic uses comprehensive risk management processes to identify, assess, and mitigate modern slavery risks within its operations and supply chains. This includes regular risk assessments and integrating modern slavery considerations into broader risk management frameworks.
Supplier On-boarding Practices	Qtectic's supplier on-boarding process includes rigorous checks to ensure new suppliers comply with modern slavery policies. This involves verifying suppliers' adherence to corporate social responsibility standards and conducting due diligence to identify potential risks.
Whistleblowing Mechanisms	Qtectic has established secure and confidential whistleblowing mechanisms to encourage reporting of any suspected modern slavery activities. These mechanisms are regularly reviewed to ensure they are effective and accessible.
Continuous Improvement	Since 2021, Qtectic has made several updates to its modern slavery governance process, reflecting the company's commitment to continuous improvement and adaptation to emerging risks and regulatory changes. This includes regular audits and reviews to identify areas for improvement and implement necessary changes.

Table 2 – Key Elements of Qtectic's Governance Framework

6.2 Our policies and procedures

Qtectic has a set of policies and procedures that articulate our values, ways of working and expectations for our team and suppliers. This policy framework aims to ensure that our team members and suppliers clearly understand our expectations, and equally that they can recognise when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint.

The policies that are most relevant to managing modern slavery risk in our operations and supply chain are noted in Table 3 below:

Policy / Procedure	Purpose
Code of Conduct	Sets out how Qtectic expects team members to behave towards each other, our customer, and the broader community.
Whistleblowing Policy and Procedure	Encourages reporting of wrongdoing by providing a convenient and safe reporting mechanism, and protection for people who make disclosures in accordance with the policy.
Responsible Procurement Policy	Sets out Qtectic's expectations for all direct suppliers in relation to human rights, modern slavery and responsible sourcing
Grievance Policy	Outlines Qtectic's procedures for grievance assessment, investigation, and remediation.

Table 3 – Qtectic Policies

Qtectic reviews its policies and procedures regularly and, if necessary, updates them to ensure that policy framework is robust and minimises the risk of modern slavery in its operations and supply chain.

6.3 Review of FY2023-24 Activities in relation to Modern Slavery Risks

Qtectic's approach to assessing and addressing the risk of modern slavery in its operations and supply chain, and assessing the effectiveness of its approach, has been incorporated into the Qtectic compliance framework and processes. This aims to ensure that Qtectic has robust and effective processes that are firmly engraved in how it conducts business.

Table 4 below outlines Qtectic's work performed to date to address the risk of modern slavery:

Action	Work Performed	Status/Timing
1. Identify	<p>A Modern Slavery Working Group was established in March 2021 to identify key modern slavery risks and requirements and oversee integration into existing risk and compliance functions. The Modern Slavery Working Group consists of the Finance Director, Finance Manager and HR Manager.</p> <p>Highlights of the achievements of the Modern Slavery Working Group include:</p> <ul style="list-style-type: none"> Comprehensive Review: Analysed operations and supply chains to identify potential modern slavery risks. Policy Integration: Incorporated modern slavery considerations into existing policies, including the Code of Conduct. Awareness Training: Delivered training sessions for staff and 	<p>The Modern Slavery Working Group met quarterly throughout the year.</p> <p>Quarterly updates were completed as part of the supplier risk review.</p> <p>Quarterly supplier risk reviews cover the following areas:</p> <ul style="list-style-type: none"> Examines the supplier's operational capacity and delivery reliability. Assesses the supplier's financial health and ability to fulfill contracts. Ensures the supplier adheres to relevant laws and regulations, including labor laws and modern slavery acts. Reviews the supplier's reputation and any past issues, such as legal disputes or

	<p>suppliers to increase awareness of modern slavery risks and company policies.</p> <ul style="list-style-type: none"> • Reporting Procedures: Established secure whistleblowing mechanisms and procedures for reporting modern slavery concerns. • Regular Updates: Continually reviewed and updated modern slavery policies and procedures to align with best practices and regulatory changes. • Board Reports: Provided updates to the Board, ensuring transparency and accountability in managing modern slavery risks. 	ethical concerns.
2. Develop, document, and execute	<p>Key activities undertaken in 2023-24 include:</p> <ul style="list-style-type: none"> • Ensured that all relevant Qtectic policies and procedures included modern slavery considerations; • Communicated with suppliers based on risk factors through regular scheduled meetings. • Maintained staff awareness and capacity of staff to identify and report modern slavery associated risks through internal Lunch and Learns sessions. • Undertook external training and maintained communication in relation to modern slavery risk; and • Included modern slavery training as an employee performance objective. 	Each of the activities committed to was undertaken in 2024.
3. Monitor risks	<p>Reviewed risks identified by the supplier risk review, Alstom Modern Slavery Statement 2024 and any risks noted as part of internal reviews and audits undertaken.</p> <p>The supplier risk review involves a detailed analysis of the main suppliers to the Project, whether that be direct or indirect and whether any issues or concerns are identified from a financial, environmental or governance perspective including the risk of modern slavery.</p>	<p>Supplier risk review is conducted on a quarterly basis.</p> <p>Alstom's Modern Slavery Statement 2024 was reviewed.</p>

	All staff formally acknowledged modern slavery training as part of introduction of new payroll system.	
4. Report, escalate and assurance	<p>Modern slavery reporting to the Board was undertaken at a minimum of twice a year throughout 2024.</p> <p>This included an overview provided by the Finance Director at the Board Meeting of the activities undertaken in the period and whether any issues have been identified and updates on legislative activity.</p>	Completed
5. Assess effectiveness of the above actions	<p>Modern Slavery Working Group met quarterly and ensured that internal controls remained up to date. The work included:</p> <ul style="list-style-type: none"> • Review of findings from the supplier risk review; • Updates on meetings with key personnel from the Subcontractor • Review of legislative changes • Review of any past activities within the group (if any) that may have raised potential concerns • Updates on training within the Group to increase awareness of modern slavery risks • Review of potential training opportunities for the Modern Slavery Working Group to increase awareness of modern slavery risks 	Completed

Table 4 - Work Performed to Date to Address the Risk of Modern Slavery

6.4 Planned Actions for FY2024-25

Table 5 below outlines the work Qtectic intends to perform to address the risk of modern slavery during FY2024-25:

Action	Work to be Performed	Status/Timing
1. Identify	The Modern Slavery Working Group is committed to meeting on a quarterly basis to identify/review key risks and requirements and oversee integration into existing compliance functions.	Ongoing quarterly meetings are scheduled for FY2024-25.
2. Develop, document, and execute	<p>Key activities to be undertaken in 2024-25 include:</p> <ul style="list-style-type: none"> Continue to ensure that all relevant group policies and procedures include modern slavery considerations; Undertake quarterly supplier risk reviews; Ensure communication with subcontractors based on risk factors; Maintaining awareness and capacity of staff in regard to Modern Slavery risks through internal training; and Incorporate modern slavery training as an employee performance objective in 2025. Expand the Modern Slavery Working Group to include a direct employee from Operations 	<p>Quarterly supplier risk reviews.</p> <p>Modern slavery awareness included as part of induction for all new staff.</p> <p>Refresher training to all staff on an annual basis.</p> <p>Include a direct employee from Operations as part of the Modern Slavery Working Group in Quarter 1, 2025.</p>
3. Monitor risks	<p>Incorporate outcomes from reviews undertaken into policies and procedures.</p> <p>Review the risks identified and improve processes such as implementing regular reviews of our suppliers.</p>	<p>Supplier risk review to be conducted on a quarterly basis.</p> <p>Review of policies and procedures throughout 2025 and ensure references to modern slavery risk are made where applicable.</p>
4. Report, escalate and assurance	Modern slavery reporting to the Board to be undertaken on a regular basis and at a minimum on a six-monthly basis.	Report to Board each six months at a minimum.

5. Australian legislation amendments going forward	<p>On 25 May 2023, the Attorney-General's Department released the outcomes of the statutory review of the Australian <i>Modern Slavery Act 2018</i>.</p> <p>The report makes 30 recommendations for change which, if adopted, will mark a substantial strengthening in Australia's efforts to combat modern slavery, as well as more onerous due diligence and reporting requirements for companies.</p> <p>Qtectic will ensure that it complies with any amendments to the Act.</p>	<p>Include assessment of any amendments to the Act in the quarterly Modern Slavery Working Group meetings.</p> <p>Report to the Board of any amendments to the Act.</p>
6. Assess effectiveness of the above actions	<p>Modern Slavery Working Group to regularly review the actions taken by Qtectic and ensure Qtectic's modern slavery controls remain effective.</p> <p>Qtectic to meet with subcontractors to understand the controls they have in place with respect to modern slavery risks and to communicate Qtectic's expectations in relation to those controls.</p>	<p>Quarterly meetings are scheduled for 2025 for the Modern Slavery Working Group.</p> <p>Quarterly reviews with subcontractors.</p>

Table 5 – Work to be Performed in FY 2024-25

7. Joint Modern Slavery Statement

This statement was prepared by NGR Project Company Pty Ltd atf for NGR Project Trust on behalf of the NGR Group. NGR Project Company Pty Ltd did not consider that formal consultation with the other entities in the NGR Group was necessary in preparing this statement. Each of the entities has the same Board of Directors and employees who are responsible for the management of all NGR Group entities. All NGR Group entities adhere to the policies and procedures described in this statement.

The Modern Slavery Statement was reviewed, discussed and approved by the Board on 19 December 2024.

Timothy Griffiths

Chairperson of NGR Project Company Pty Ltd

Michael Chadwick

Chief Executive Officer of NGR Project Company Pty Ltd