

MODERN SLAVERY STATEMENT

M1 METRO NORTHWEST AND BANKSTOWN LINE

FINANCIAL YEAR 2025/2026 METRO TRAINS SYDNEY PTY LIMITED

ACN 600 820 737

INFORMATION

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1 About MTS

Operating since July 2014, Metro Trains Sydney Pty Limited ACN 600 820 737 (MTS) is now in its seventh year of operating and maintaining Australia's first fully automated passenger railway, the Sydney M1 Metro Northwest and Bankstown Line.

The M1 Line comprises a 51.5 km fully automated (driverless) rail line between Tallawong and Sydenham. The M1 Line will continue through to Bankstown in late 2026, enhancing seamless connectivity across Greater Sydney.

MTS is a joint venture between MTR Corporation, John Holland Group and MTS HoldCo Pty Ltd. MTS employs over 650 people. MTS is the reporting entity required to provide a modern slavery statement under the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) and does not own or control any other entities.

As a business, MTS understands its role and impact in standing against modern slavery. MTS actively ensures that its supply chain and procurement practices reflect this.

This modern slavery statement was approved by the Board of Metro Trains Sydney Pty Limited on 24 June 2026.

Oliver Bratton
Oliver Bratton (09/06/2026 09:55:47 GMT+1) (Signed)

Name: Oliver Bratton

Director and Chief Executive Officer

2 MTS Operations

MTS is committed to acting ethically and with integrity and transparency in all its business dealings and relationships. MTS continues to implement and enforce effective systems and controls to ensure modern slavery is not taking place in its own business or its supply chain.

MTS maintains electronic records of 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 the Rail Safety National Law. The records also provide visibility of workers moving between projects.

MTS has a core team of employees who have specialist knowledge and experience in areas such as operations, engineering and maintenance, assurance services, competency management, rail safety, learning and development, account management, information technology, cyber security, finance and legal.

3 MTS Supply Chain

The operation and maintenance of the Sydney Metro M1 Line require teamwork and collaboration from our critical operational partners who help us deliver a safe and reliable service for our customers, including Alstom, CBRE, EnerMech, Hitachi Rail, Schindler, John Holland Group, UGL Engineering, Gilgen and TK Elevator. MTS also engages suppliers for banking, insurance broking, telecommunications, training and consultancy services.

MTS' supply chain comprises organisations predominantly based in Australia. The supply chain has limited exposure to organisations based in China, India and Europe. MTS mainly sources rolling stock and signalling maintenance spares from overseas. Due diligence is undertaken in relation to both local and overseas suppliers as part of our internal policies.

4 Our Approach to Key Risks

4.1 Operational Risks

Due to MTS' localised operational structure and the fact that the majority of employees are professionals and are technically qualified, modern slavery risks are perceived to be low within our organisation.

4.2 Supply Chain Risks

MTS' current focus is to gain visibility into suppliers that MTS directly engages as set out in the MTS Procurement Policy (NWRLOTS-NRT-PRD-PM-POL-910152). This policy covers both local and overseas sourced suppliers.

High-risk categories of services identified are typically engaged in low-skill manual tasks and nontechnical or skilled labour hire providers such as service desk providers. Often without union representation or enterprise agreements and/or from disadvantaged backgrounds, this is an example of potential for unsafe work practices or exploitation.

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 Index.

4.3 Supplier Relationships

Maintaining supplier relationships through good communication and robust contract management has been important in gaining greater visibility of potential modern slavery risks. MTS needs critical suppliers to be able to carry on business to support our continuing operations. MTS has not observed any significant changes in supply chain or increased modern slavery risks within our critical suppliers.

5 Actions Taken by MTS to Address Key Risks

5.1 Recent Initiatives

During FY25/26, MTS has continued to monitor and ensure MTS complies with the Modern Slavery Act and that our practices are supportive of driving anti-modern slavery behaviours. Key initiatives include the introduction of a company-wide training module on Modern Slavery and introduction of a questionnaire for significant contractors to declare and reflect on modern slavery within their business.

Going forward, MTS will continue to carry out due diligence during procurement and regular engaging with suppliers and subcontractors on matters relating to modern slavery in their businesses and supply chain. MTS suppliers are aware of the consequences of a negative finding in respect of modern slavery, which will result in a right of contract termination.

5.2 Ongoing Practices

MTS has a range of ongoing practices in place relating to anti-modern slavery, including the following:

- A zero-tolerance approach to modern slavery and setting benchmarks as to how all parties must approach and deal with any issues of modern slavery within their businesses and supply chains.

- To support broader awareness and understanding of modern slavery risks across the business, MTS has developed and implemented an e-learning module, which has been rolled out organisation-wide in 2026. This training is designed to build a shared understanding of what modern slavery is, how it can occur within supply chains and business operations, and the responsibilities each individual holds in identifying and responding to potential risks. It will equip MTS staff with the knowledge and confidence to recognise warning signs, take appropriate action, and ensure we are meeting our compliance obligations.
- A formal Modern Slavery Policy (MTSMS-LE-POL-000001) which underpins its zero-tolerance approach to all forms of modern slavery and reinforces the MTS commitment to ethical sourcing and responsible business practices.
- The MTS Code of Conduct (MTS-ECP-PO-001) functions as a workplace behaviour policy, which provides clear guidelines for all MTS employees and MTS' expectations of them. This includes that MTS employees must abide by all of MTS policies and procedures, which extend to anti-modern slavery guidelines included in MTS' Procurement Policy, and to the MTS CEO Whistleblower Policy (NWRLOTSNRT-ADM-GN-POL-720426).
- As to consideration for the selection of suppliers, MTS' Procurement Policy includes provisions requiring MTS to obtain a warranty from each of its suppliers that there are not, and on an ongoing basis will not be, any instances of modern slavery occurring within the supplier's business or supply chain.
- As part of our Supplier Registration Form, suppliers must declare compliance to Modern Slavery legislation.
- MTS' standard purchasing contract templates contain restrictions on sub-contracting of works, audit rights and reporting/information requirements relating to labour hours and pay.
- Similarly, MTS' Minor Works Agreement Template (MTSMS-PR-TEM-000001) requires subcontractors to provide a statutory declaration that they are not involved in any offences involving modern slavery and have made reasonable enquiries of their supply chains in relation to the same. MTS also has a right to audit the subcontractor's compliance with the Modern Slavery Act and its compliance with that statutory declaration in respect of any potential use of modern slavery in the subcontractor's supply chain.
- The MTS CEO Whistleblower Policy, which was implemented in 2019, ensures that anyone who has reasonable grounds to suspect an instance of, among other things, modern slavery, has a mechanism to report this freely and without fear of reprisal.
- Additionally, MTS have a Speak Up Program (a whistleblower program) that enables the reporting of a wide range of disclosable conduct. It is accessible to employees, contractors and members of the MTS supply chain.
- MTS has strong and regular engagement with its suppliers and robust contract management processes. This has enabled MTS to undertake a thorough assessment of its supply chain to identify, prevent, mitigate and take into account modern slavery risks. There will be a focus on monitoring as MTS' supply chain mapping continues to mature.

6 Assessing Effectiveness

6.1 Improvement across existing practices

- MTS 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 related contract clauses regarding audit requests and provision of records.

- The is supplemented with the addition of our questionnaire which focuses exclusively on Modern Slavery risks and prevention practices. Managing risk within its extended supply chain through the use of a targeted supplier questions, designed to assess suppliers' exposure to modern slavery risks and support the implementation of appropriate mitigation measures.
- Reasonable restrictions on subcontracting of works has reduced risks of sham contracting and improved job security of workers, especially for labour intensive services contracts. These restrictions include restricting subcontracting within maintenance contracts without prior written approval from MTS.
- MTS requests significant contractors to submit a statutory declaration annually certifying that, to the best of their knowledge, no instances of modern slavery occur within their business operations or supply chains. This will enable MTS to actively engage with subcontractors and suppliers and work with them to mitigate any potential risks of modern slavery. As mentioned above, MTS has introduced a learning and development course for employees regarding Modern Slavery that is to be completed biannually.

7 Consultation and Collaboration

MTS continues to consult its business partners and Executive Leadership Team on addressing modern slavery concerns within its supply chain.

8 Looking Forward

MTS will continue to strengthen its management assurance processes to reduce the risk of modern slavery use its best endeavours to reduce the risk of modern slavery within the organisation and its growing network.

MTS will continue to implement training across the organisation to ensure awareness, prevention, detection and response to modern slavery issues across the organisation. MTS has in place a channel to report concerns or make further enquiries about modern slavery risks and embed those into business practices.

MTS will continue to review our policies and procedures with a human rights lens to ensure they continue to be supportive of our actions to prevent and mitigate instances of modern slavery.

APPENDIX A: Version History

Approval Record

Function	Position	Name	Signature	Date
Prepared by	Senior Legal & Commercial Manager	Jocelyn Tan		04/06/2026
Reviewed by	Senior Procurement & Contracts Manager	Hani Noami		09/06/2026
Endorsed by	Head of Procurement & Contracts Management	Alan Clark		09/06/2026
Approved by	General Counsel, Legal & Commercial	Chris Collins		09/06/2026

MTS-Long-Aptos Template. *Template document number MTSMS-DC-TEM-000003 rev 03 date 01/02/2026.

Amendment Record

Date	Rev	Amendment description	By
23/06/2024	02	Update for financial year 2022-2023.	Andrew Fox
01/04/2025	03	Update for financial year 2024-2025.	Andrew Fox
28/04/2025	03	Update to current MTS template standard. Updated referenced documents to current revisions (e.g. changed reference to maintenance services agreement template to minor works agreement template). Addition of document number references. Grammar corrections.	Peter Simcic
27/05/2025	03	Update for financial year 2024-2025 to include updated business information.	Jocelyn Tan
3/06/2026	04	Update for financial year 2025-2026 to include updated business information.	Jocelyn Tan

APPENDIX B: Glossary and List of Terms

Term	Definition
FY	Financial Year
MTS	Metro Trains Sydney

APPENDIX C: Related Documents

Note: some documents will be closely interconnected and will need to be reviewed when this one is changed. Those will be marked yes in the review column below.

Others are simply related content that supplement the material in this document.

Document #	Document Title	Review
NWRLOTS-NRT-ADM-GN-POL-720426	CEO Whistleblower Policy	No
MTSMS-PR-TEM-000001	Minor Works Agreement Template	Yes
MTSMS-LE-POL-000001	Modern Slavery Policy	Yes
MTS-ECP-PO-001	MTS Code of Conduct	No
NWRLOTS-NRT-PRD-PM-POL-910152	Procurement Policy	No

MTSMS-PAC-STA-000001 Modern Slavery Statement rev04

Final Audit Report

2026-06-09

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