

Modern Slavery Statement

M1 Metro Northwest and Bankstown Line

Financial Year 2025 Metro Trains Sydney Pty Limited

ACN 600 820 737

Information

Issue Date:

20/06/2025

Next Review Date:

19/06/2026

Network:

Overall

Version:

03

Document Number:

MTSMS-PAC-STA-000001

Alternative Number:

SMCSWTS2-MTS-1NL-LE-PRO-002656

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version **03**

This document is uncontrolled when printed.

Page 1 of 10

Table of Contents

1. About MTS.....	3
2. MTS Operations.....	3
3. MTS Supply Chain	4
4. Our Approach to Key Risks	4
4.1 Operational Risks.....	4
4.2 Supply Chain Risks.....	4
4.3 Supplier Relationships.....	5
5. Actions Taken by MTS to Address Key Risks.....	5
5.1 Laying Foundations	5
5.2 Ongoing Practices.....	5
6. Assessing Effectiveness.....	6
7. Consultation and Collaboration	7
8. Looking Forward	7

List of Figures

No table of contents entries found.

List of Tables

No table of contents entries found.

Appendix

APPENDIX A: Version History	8
APPENDIX B: List of Terms	9
APPENDIX C: Related Documents	10

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.

Page 2 of 10

1. About MTS

Operating since July 2014, Metro Trains Sydney Pty Limited ACN 600 820 737 (MTS) is now in its sixth year of operating and maintaining Australia’s first fully automated passenger railway.

MTS is the operator and maintainer of Australia’s largest public transport project, the Sydney Metro M1 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 or around late 2026, enhancing seamless connectivity across Greater Sydney.

MTS is a joint venture between MTR Corporation, John Holland Group and UGL Rail, a division of UGL Pty Ltd. MTS employs over 600 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 19 June 2025.



..... (Signed)

Name: Daniel Williams

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.

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.

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 requires teamwork and collaboration from our critical operational partners who help us deliver a safe and reliable service for our customers, including Alstom, Schindler, John Holland Group, UGL Engineering, Faiveley, Enermech, Freyssinet, Gilgen and Thyssen Krupp. 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. 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.

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.

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 Laying Foundations

During FY24/25, 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.

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.
- 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 (NWRLOTS-NRT-ADM-GN-POL-720426).
- As to consideration for the selection of suppliers, MTS' Procurement Policy (NWRLOTS-NRT-PRD-PM-POL-910152) 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.

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.

- 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) has been updated, requiring 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. Going forward, suppliers will be required to provide these statutory declarations annually to MTS. Periodic contractor meetings are also held to assess the subcontractor's performance.
- 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

MTS assesses the effectiveness of these actions through its reviews of contract management.

Improvement across existing practices

- MTS' suppliers are covered by a cyclical audit program and MTS follows up 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 MTS' suppliers. 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.
- 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.

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.

New measures to be introduced

- MTS plans to implement additional measures to all subcontractors and suppliers in relation to their modern slavery compliance. This includes requiring subcontractors and suppliers to provide statutory declarations in relation to their supply chain. Going forward, they will be required to provide this on a regular basis. This will enable MTS to actively engage with subcontractors and suppliers and work with them to mitigate any potential risks of modern slavery.

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.

An MTR, John Holland and UGL Rail Company


Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.

APPENDIX A: Version History

Approval Record

Function	Position	Name	Signature	Date
Prepared by	Procurement Commercial Manager	Andrew Fox	 <small>Andrew Fox (Jun 11, 2025 13:41 GMT+10)</small>	11/06/25
Reviewed by	Senior Legal and Commercial Manager	Jocelyn Tan		11/06/25
Endorsed by	Head of Procurement and Contracts Management	Alan Clark		12/06/25
Approved by	General Counsel Legal and Commercial	Chris Collins		12/06/25

MTS General Long Template. *Document number MTSMS-DC-TEM-000003 rev 01 date 10/12/2024.

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

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.

APPENDIX B: 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

An MTR, John Holland and UGL Rail Company

Modern Slavery Statement

MTSMS-PAC-STA-000001 | version 03

This document is uncontrolled when printed.











MTSMS-PAC-STA-000001 Modern Slavery Statement

Final Audit Report

2025-06-12

Created:	2025-06-11
By:	Jocelyn Tan (jocelyn.tan@metrotrains-sydney.com.au)
Status:	Signed
Transaction ID:	CBJCHBCAABAA3M0BVTxhQDb6nLqykRf_pK_Ebsfzy5EB

"MTSMS-PAC-STA-000001 Modern Slavery Statement" History

-  Document created by Jocelyn Tan (jocelyn.tan@metrotrains-sydney.com.au)
2025-06-11 - 1:00:10 AM GMT
-  Document emailed to Andrew Fox (andrew.fox@metrotrains-sydney.com.au) for signature
2025-06-11 - 1:00:16 AM GMT
-  Email viewed by Andrew Fox (andrew.fox@metrotrains-sydney.com.au)
2025-06-11 - 2:11:19 AM GMT
-  Document e-signed by Andrew Fox (andrew.fox@metrotrains-sydney.com.au)
Signature Date: 2025-06-11 - 3:41:18 AM GMT - Time Source: server
-  Document emailed to Jocelyn Tan (jocelyn.tan@metrotrains-sydney.com.au) for signature
2025-06-11 - 3:41:29 AM GMT
-  Email viewed by Jocelyn Tan (jocelyn.tan@metrotrains-sydney.com.au)
2025-06-11 - 3:42:27 AM GMT
-  Document e-signed by Jocelyn Tan (jocelyn.tan@metrotrains-sydney.com.au)
Signature Date: 2025-06-11 - 4:25:47 AM GMT - Time Source: server
-  Document emailed to Alan Clark (alan.clark@metrotrains-sydney.com.au) for signature
2025-06-11 - 4:25:50 AM GMT
-  Email viewed by Alan Clark (alan.clark@metrotrains-sydney.com.au)
2025-06-11 - 4:26:26 AM GMT
-  Document e-signed by Alan Clark (alan.clark@metrotrains-sydney.com.au)
Signature Date: 2025-06-12 - 0:30:47 AM GMT - Time Source: server



Document emailed to Christopher Collins (christopher.collins@metrotrains-sydney.com.au) for signature

2025-06-12 - 0:30:49 AM GMT



Email viewed by Christopher Collins (christopher.collins@metrotrains-sydney.com.au)

2025-06-12 - 2:17:47 AM GMT



Document e-signed by Christopher Collins (christopher.collins@metrotrains-sydney.com.au)

Signature Date: 2025-06-12 - 7:40:19 AM GMT - Time Source: server



Agreement completed.

2025-06-12 - 7:40:19 AM GMT



Adobe Acrobat Sign