

A man in an orange high-visibility work shirt and safety glasses is working on a large, curved metal component. He is wearing a grey glove on his right hand, which is holding a tool. The shirt has several patches: a name patch that says "DAVE", a "WORKCRAFT" patch, and a "GEMCO RAIL Make Safe" patch. The background is dark and industrial.

Engenco

MODERN SLAVERY STATEMENT 2024

Modern Slavery Statement

2024

This statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth) (Act). It is submitted by Engenco Limited (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 2024 (FY24).

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.

The Engenco Group is committed to upholding fundamental human rights and eradicating modern slavery in all its forms. We understand our obligations to manage and address the risk of modern slavery across our operations and supply chains.

This statement was prepared in line with Section 16 of the Australian Modern Slavery Act 2018 ("The Act"), and 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.

Engenco



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 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

At the Engenco Group, we are guided by our vision of **inspired people creating sustainable transportation solutions**. As we pursue our vision, we uphold ethical business practices, by operating with integrity and accountability. Across our operations we prioritize the health, safety and wellbeing of our staff, customers and supply partners and remain mindful of the impacts our operations have on the environment and community. We are dedicated to fostering positive change by embracing sustainability and integrating responsible practices across our operations. Our commitment to these principles is embodied in our Code of Conduct and underpinned by our Values.



Integrity

We are committed to doing the right thing. We are motivated to promote a culture of trust, to operate ethically, honestly, legally and transparently and to deliver on what we promise.



Commitment

We are committed to accepting our responsibilities and delivering on our promises. We pledge to maintain a healthy and safe working environment, to practice sustainable business and to work with our customers to deliver quality solutions.



Collaboration

We are committed to working as a team to accomplish our individual and Group goals. We understand that our differences make us stronger. We listen to each other and welcome the opportunity to learn something new. Together we will succeed.



Excellence

We are committed to be the best at what we do. We are driven to never compromise on quality, safety, to prioritise value and to celebrate innovation.

The Engenco Group's governance framework supports our commitment to operating ethically and with integrity, particularly in identifying, and addressing the risks associated with modern slavery. We recognise that modern slavery can take many forms, including human trafficking, slavery, forced labour, and the worst forms of child labour. We are dedicated to combating modern slavery across our operations and throughout our supply chains.

The Engenco Group's governance framework includes, but is not limited to:

- Our **Risk Management Policy** outlines our approach to risk management, aligning closely with our operational activities and adhering to principles outlined in our Corporate Governance Statement.
- Our **Code of Conduct** establishes the principles and standards that all officers and employees of the Engenco Group are expected to comply with in the performance of their duties.
- Our **Whistleblower Policy** defines the process for 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 14, 140 William 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, digital 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), information technology solution providers, 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) (DTPP). DTPP is a non-trading holding company wholly owned by Engenco. Drivetrain's registered address is Level 14, 140 William 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 Supply and Inventory Manager.

CONVAIR ENGINEERING PTY LTD (CONVAIR)

Convair is a proprietary limited company wholly owned by Engenco with its registered office at Level 14, 140 William Street, Melbourne, Victoria 3000. Its principal place of business and manufacturing facility is located at 93 Miller Street, Epping, Victoria 3076. Convair employs approximately 30 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 14, 140 William 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), Rutherford and 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. In support of wagon manufacture contracts awarded in FY2024 Gemco procures wagon components from suppliers operating from China and India.

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 14, 140 William Street, Melbourne, Victoria 3000. Momentum employs approximately 40 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 14, 140 William Street, Melbourne, Victoria 3000. CERT employs approximately 40 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 service providers. CERT has a long-term supply agreement in place with a medical services provider to perform rail and other workplace medicals.

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 14, 140 William 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 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.

To identify and reduce the risk of modern slavery within our supply chains, the Group has conducted a review and subsequent update of our Supplier Management process. Conducted in consultation with members from the Group's Modern Slavery Working Group (Working Group), Procurement, Workplace Health and Safety and Finance teams the Supplier Management process provides a consolidated approach to mitigating potential risks associated with our suppliers, and includes transparency relating to the risk of Modern Slavery, while ensuring continuity and resilience in our supply chain.

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 a small number of suppliers do operate from countries with a medium risk level. For suppliers considered above the low prevalence threshold further due diligence was conducted, including, in some instances a three part audit process, which included internal and external audits of the vendors governance framework in addition to facility inspections. The businesses continue to monitor these relationships for risk of modern slavery exposure.

¹ According to the Global Slavery Index 2024 published by the Walk Free Foundation (<https://www.walkfree.org/global-slavery-index/>).

Assessing effectiveness

The Engenco Group remains committed to operating with integrity, and conducting business ethically, honestly and legally. In support of this commitment, and to increase awareness of potential ethical issues the Engenco Group recently launched a Responsible Procurement training module. Issued to the Group's Executive, leadership, sales and procurement teams this training was designed to increase awareness in recognising signs of bribery, corruption, and modern slavery, while providing guidance for what to do if a risk is identified. Arming our people with the relevant knowledge and tools is an essential step in combating modern slavery.

With enhanced awareness and improving our due diligence approach for managing suppliers the Group is prepared and able to identify and mitigate modern slavery risks.

The Engenco Group is not aware of any instances of modern slavery in its operations or supply chain during FY24. Nevertheless, the Group remains committed to continuously improving our systems, processes, and actions to identify, assess, and address modern slavery across our businesses.

Looking Ahead

PRIORITIES FOR FY25

Our key priorities for the financial year ending 30 June 2025 (FY25) include:

- Leveraging our existing supplier audit program the Group is committed to extending this systematic review and assessment of our vendors to include a review of potential modern slavery risks. Through regular consultation and evaluation of our vendors, we promote transparency and drive improvement for the entire supply chain.
- On-going review and update to our Modern Slavery Policy, and wider governance framework to incorporate any best practice or legislative changes.
- Collaborating with industry associations, peers and stakeholders to increase awareness and develop collective solutions to modern slavery.

Approval

The Board of Engenco Limited has approved this statement on behalf of the Engenco Group on 20 November 2024.



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 with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.	2
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	3, 4, 8



Engenco Limited

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