



JOINT MODERN SLAVERY STATEMENT

2024

SYSTRA

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AT SYSTRA,

we are committed to conducting our business in an ethical and responsible manner. This Modern Slavery Statement outlines the steps we have taken and will continue to take to ensure that modern slavery does not occur within our operations or supply chains.



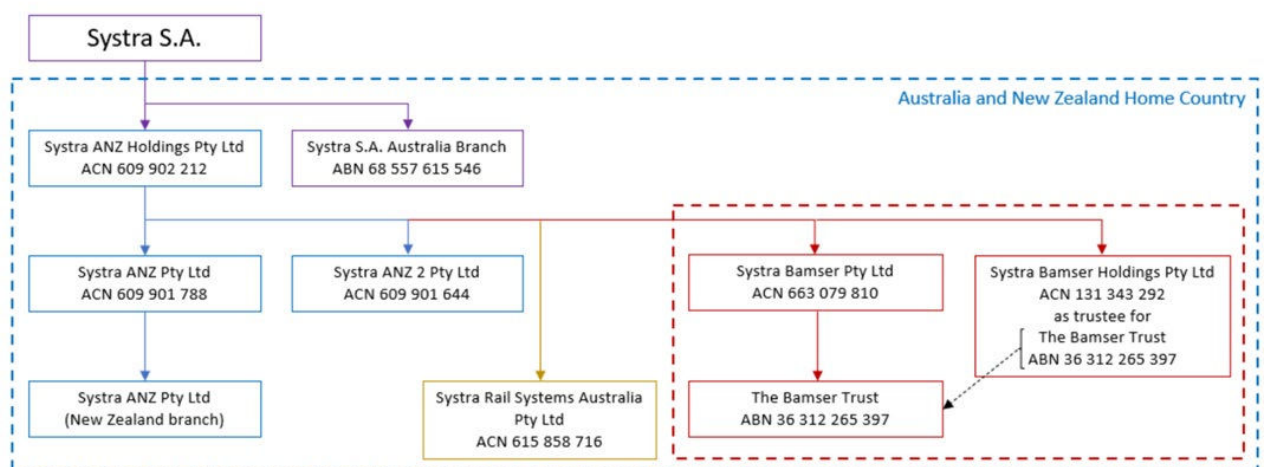


SYSTRA ANZ acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea, and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.



Reporting entity and period

This joint statement covers **SYSTRA ANZ Holdings Pty Ltd** (ACN 609 902 212) and all its subsidiaries operating in Australia ('**SYSTRA ANZ**') as listed below, as of June 2025.

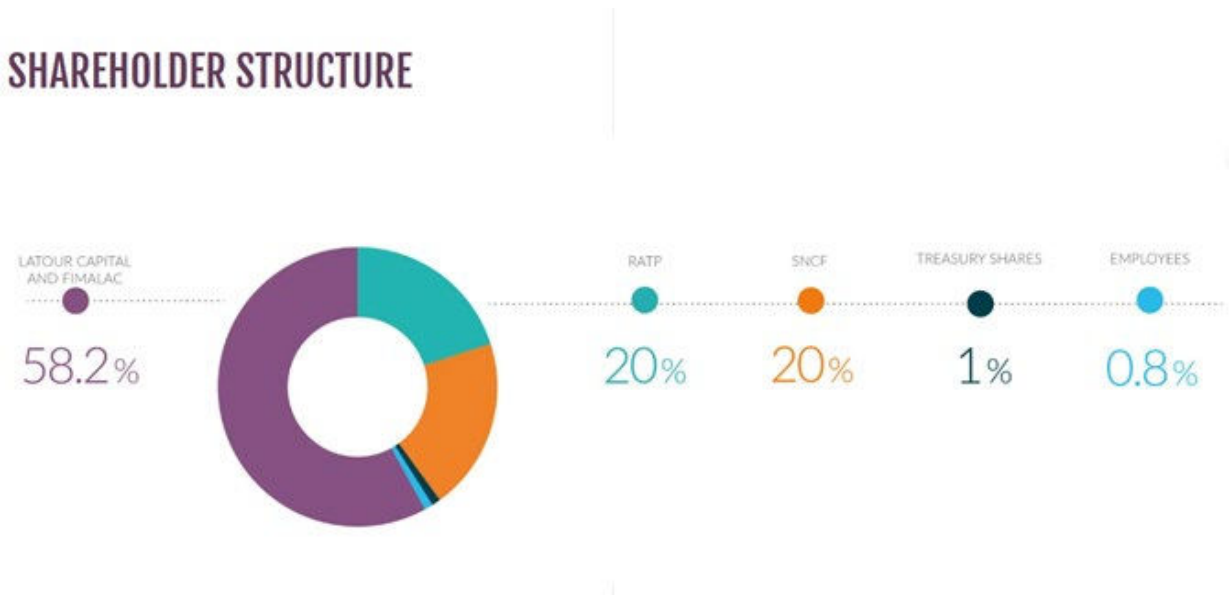


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REFERENCE (SAIMS): SAIMS-GUD-1025, VERSION: 1.0, APPLICATION DATE: 30/05/2025

REFERENCE (MYSMI): GU-02704, VERSION: 1.0, APPLICATION DATE: 30/05/2025

In the above chart, 'SYSTRA S.A' refers to the SYSTRA Group ('SYSTRA Group'). Our shareholder structure is as follows:



This Modern Slavery Statement details the measures implemented by SYSTRA ANZ to detect, assess and mitigate the risks of modern slavery within its operations and supply chains, in compliance with the *Modern Slavery Act 2018* (Cth) ('**Act**') for the reporting year ending 31 December 2024.

Whilst SYSTRA ANZ Pty Ltd (company number: 6329224), our New Zealand branch, is not captured by the Act, we note that the same internal rules and policies are applicable to this entity. This further highlights our commitment to maintaining ethical practices.

Identifying and Assessing the risk of Modern Slavery

SYSTRA Group

SYSTRA Group is present on five continents and its expertise networks enable the needs of its clients to be addressed, throughout the world.

SYSTRA Group is a global leader in mass transport and smart mobility, headquartered in France, which employs state of the art techniques and develops innovative solutions

that meet the explosive growth in demand for public transport and alternative transportation delivery services in and around the world's largest metropolitan areas. The SYSTRA Group is unique in its global focus on transportation and transportation technology solutions and is home to more than 11,000 employees around the world who share a passion for enhancing the mobility and hence the economic wealth and sustainability of the communities that we serve. In 2024, SYSTRA Group had revenues of 1.25bn Euros, 80% of which being earned from international markets.

SYSTRA Group's expertise spans the entire spectrum of transportation. From metros, tramways, high speed and heavy rail to bridges, roads and tunnels, SYSTRA Group is focused on delivering positive outcomes that move the world forward. SYSTRA Group is committed to planning, designing and delivering safe, efficient, cost-effective transport solutions that enhance the passenger experience. It is present from the earliest phases of a transportation scheme, advising city authorities on strategy, policy and planning, through to design, project management, construction supervision, system integration, testing and commissioning, and asset management. In more than 65 years, the expertise of our teams has gained the confidence of towns and regional authorities around the world, leveraging sustainability, reliability and safety to meet the challenges raised by mobility: access for all to education, employment and leisure activities, and energy transition.

SYSTRA ANZ

SYSTRA in Australia and New Zealand integrates systems expertise with infrastructure, delivering solutions that keep our society moving. We bring 65 years of global experience to local challenges, offering specialist engineering skills that are hard to find elsewhere. Our international production model allows us to scale rapidly, giving our local clients unparalleled access to world-class infrastructure solutions.

To keep pace with this fast-growing market, we rely on our flexible, transversal organisation, on our in-depth understanding of the challenges of sustainable mobility, and on our dedication to meeting our clients' needs.

SYSTRA ANZ is governed as a wholly owned subsidiary of SYSTRA S.A. and is run by a Managing Director of SYSTRA ANZ (also known as SYSTRA ANZ CEO). The role of the Managing Director/CEO for SYSTRA ANZ is to govern the local business, provide leadership (setting local strategy, vision, mission and culture), managing company resources and tools, operations and performance, maintaining compliance to laws and upholding company policies and procedures. The SYSTRA ANZ CEO is ultimately

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responsible for the going concern of the business and the safety, wellbeing and development of all its people.

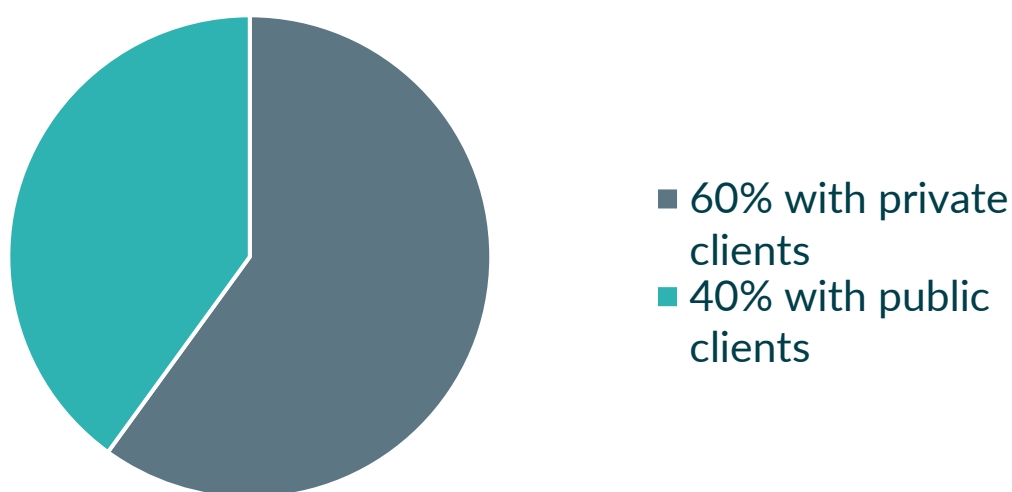
SYSTRA ANZ provides consulting, project management, engineering design and build and operational advice to the Transport, Utilities, Mining, Energy and Federal Government Agencies (focusing on national security and resilience). The delivery of these services is structured around three (3) market facing business lines:

- Infrastructure Engineering,
- Systems,
- Security and Technology Solutions.

The business lines are responsible for delivering the ANZ P&L for their area of responsibility. The rest of the organisation consists in corporate functions including operations, finance, people and culture, legal, growth and development.

SYSTRA ANZ's key direct clients include both public entities and private companies.

TURNOVER SPLIT



The majority of our supply chain consists of professional service providers who primarily act as subconsultants, along with suppliers of services and equipment to our offices.



In Australia and New Zealand, we employ over 300 staff members across 7 offices, with our head office presently located in the Sydney CBD at Level 15/2 Chifley Square, Sydney, NSW 2000. Our head office is scheduled to relocate to Level 13, 65 Berry Street, North Sydney, 2060, in September 2025.

Our supply chain consists of suppliers based in Australia, intercompany arrangements with other SYSTRA Group entities outside of Australia, and 'non-SYSTRA Group' suppliers located outside of Australia.

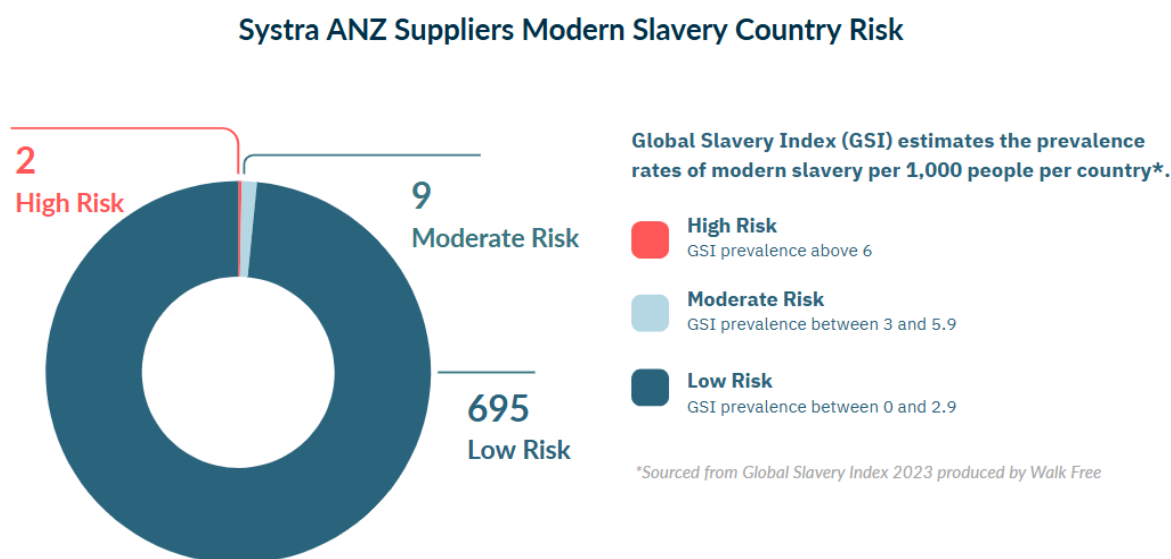
SYSTRA ANZ conducted a risk assessment of active suppliers by extracting and consolidating supplier data from the ERP systems of each subsidiary of SYSTRA ANZ Holdings Pty Ltd, excluding direct employees. Suppliers were classified as domestic, international, or intercompany, with intercompany suppliers considered low risk due to common ownership and compliance standards. Each non-intercompany supplier was assigned a country of registration, and both the count and percentage of suppliers per country were determined. Using the 2023 Global Slavery Index (GSI) from Walk Free, each country was mapped to an external risk index, allowing suppliers to be categorized as low, moderate, or high risk. This approach provides a transparent method to identify and quantify modern slavery risks in SYSTRA ANZ's supplier pool, with a clear focus on geographic risk factors.

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Details are available in the results of risk assessment of our suppliers document: *"Modern Slavery Statement - Assessment of our supply chain 2025.xlsx"*



We assess the risk of modern slavery within our operations as low.

Most of our suppliers are located in Australia and New Zealand, regions renowned for their robust regulatory frameworks and enforcement mechanisms. Additionally, we engage with other SYSTRA Group entities overseas through intercompany arrangements, ensuring that the same ethical procedures and policies from our headquarters are consistently applied.

While a very small portion of our non-SYSTRA Group suppliers are based in higher-risk jurisdictions such as Malaysia or India, these engagements primarily involve professional sub-consultancy services, which are generally considered low risk for modern slavery.

Our assessment is informed by country-level data from the Global Slavery Index ([Global Slavery Index | Walk Free](#)).

We remain committed to the continuous review and monitoring of our current and prospective suppliers to identify any emerging or heightened risks related to modern slavery.

Actions Taken

The senior leadership team at SYSTRA ANZ is actively involved in shaping our approach to addressing modern slavery, recognising that this is SYSTRA ANZ's first modern slavery statement.

To ensure our staff is well-informed about SYSTRA ANZ's strategies for managing modern slavery risks, we are committed to updating our internal processes to mitigate these risks within our operations, and to sharing our strategies with staff via our intranet and periodic written updates.

Additionally, we are considering providing targeted training to employees identified as most exposed to potential ethical risks, based on SYSTRA ANZ's E&C risk mapping. This initiative aims to enhance awareness of this critical issue and will complement the existing policies and procedures already in place.

In addition to the actions taken to date and as set out below, SYSTRA ANZ is committed to continuing to develop and strengthen our modern slavery framework to embed our processes and systems to minimise the risks associated with modern slavery arising in our operations and supply chains.

Policies & Procedures

Our commitment to preventing modern slavery is embedded in our core policies and governance frameworks, both locally and at the Group level.

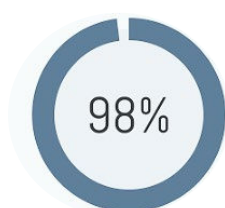


These documents outline our commitment to act ethically and with integrity in all our business relationships. In particular, our Code of Ethics explicitly prohibits any form of forced labour, human trafficking, and exploitation.

All employees and business partners are expected to adhere to these standards. They must comply with regulations and guidelines, and regardless of geographical location or position, they must remember that ethics, integrity, loyalty in business practices, and respect for others are non-negotiable and uncompromising.

Training

We recognise that education and awareness are vital in combating unethical practices. To this end, we have integrated our Code of Ethics and the Anti-Corruption Code of Conduct throughout SYSTRA ANZ by implementing mandatory online training for employees. Additionally, a variety of resources in relation to ethical conduct are readily accessible on our intranet to support employee learning. This approach ensures that all staff members are equipped to understand the risks and effectively identify and address potential unethical issues.



Our progress is reported to SYSTRA's Group on a quarterly basis. In 2024, SYSTRA ANZ achieved a 98.82% completion rate for the Anti-Corruption Code of Conduct training and a 100% completion rate for the 'Classroom trainings'.

Classroom training sessions are conducted by SYSTRA ANZ's Compliance Officer for employees identified as being the most exposed to potential ethical risks, in accordance with SYSTRA ANZ's E&C risk mapping. The purpose of these sessions is to present SYSTRA's ethics program, raise awareness of the main ethical risks, and engage participants in case studies.

SYSTRA ANZ's leadership team is also in the process of considering specific online training on modern slavery to be delivered by an external provider to specific employees of SYSTRA ANZ on an annual basis. We note this may be included in our next modern slavery statement.

Business Partner Due Diligence

Our corporate ethics and compliance initiatives also involve mandatory procedures and tasks designed to build and strengthen SYSTRA Group and SYSTRA ANZ's culture and reputation for integrity, such as our Business Partners Due Diligence procedure.

We conduct due diligence on all key partners—including suppliers, subcontractors, co-contractors, freelance consultants, members of consortia or joint ventures, as well as our direct public and private clients—to identify and mitigate any ethical risks.

To address the risks of modern slavery in our operations and supply chains, we perform due diligence and risk assessments through the 'SYSTRA Group Business Partner Questionnaire,' which requests information to verify that the partner's business practices are ethical.

We are currently considering updating these questionnaires to specifically address modern slavery risks in our supply chains.

Ethics Alert Process

SYSTRA Group has established an ethics alert mechanism to report any concerns regarding unethical practices, including those related to modern slavery.

SYSTRA requests that any employee who becomes aware of a situation constituting a breach of the Group's ethical rules and values report it to the Group Compliance Officer.

Any employee or external stakeholder can submit a report via the following address: ethics@systra.com.

The ethics alert process is available on SYSTRA's internal and external websites, and communications about the process are regularly distributed within the Group.

The ethics alert process is managed by the Group Ethics Department. Upon receipt of an alert, the Ethics Department handles it in accordance with the Investigation Protocol, which outlines the various steps of the investigation. Depending on the circumstances and the nature of the allegations, the Ethics Department may refer the matter to SYSTRA ANZ's Compliance Officer or to other departments, including Human Resources, 3S, or Sustainability.

The alert process guarantees the confidentiality of the whistleblower's identity and prohibits any form of retaliation for submitting a report.

Effectiveness of actions

We continuously monitor our progress in combating modern slavery and are committed to transparency in our efforts. SYSTRA ANZ carries out the following measures to evaluate the effectiveness of its actions in managing modern slavery risks:

1. **Reporting:** SYSTRA ANZ's Compliance Officer provides quarterly reports to the SYSTRA Group regarding adherence to our processes including in relation to employee mandatory trainings. Any significant matters are also escalated to SYSTRA ANZ's senior leadership team and/or SYSTRA Group.
2. **Continuous Improvement:** We are committed to regularly reviewing and updating our policies, procedures, and training programs to strengthen our ability to prevent and address unethical issues, including modern slavery. These reviews are typically conducted in accordance with ISO requirements and/or other relevant standards, including those set by the SYSTRA Group. For example, the Group Code of Conduct was recently reviewed, resulting in the release of the latest version in January 2023.



As outlined in the SYSTRA Group Code of Ethics, we are especially attentive to adhering to the core conventions of the International Labour Organization, with a strong focus on the prohibition of child labor and forced labor.

First Modern Slavery Statement

SYSTRA ANZ acknowledges that this is our first modern slavery statement. We are committed to continuously enhancing our processes.

1. Alongside the training we currently offer to our employees, we are considering additional online training to specific employees in relation to modern slavery, to be delivered online by an external provider.
2. We are also currently reviewing all our precedents to ensure that contracts with suppliers incorporate clauses mandating compliance with anti-slavery laws and our Code of Conduct.
3. Furthermore, we intend to adapt our Business Partner Due Diligence questionnaire to include additional questions for our suppliers in relation to modern slavery for the approval of suppliers.

Consultation Process & Board Approval

This Modern Slavery Statement was approved by the board of directors of SYSTRA ANZ Holdings Pty Ltd (as parent entity and principal governing body of all entities listed in the “*Reporting entity and period*” section of this Statement) at a meeting held on 5 June 2025, for the reporting year ending on 31 December 2024.

Prior to approval by the board of directors of SYSTRA ANZ Holdings Pty Ltd, this Statement was prepared by SYSTRA ANZ Holdings Pty Ltd in consultation with each of its subsidiaries covered by this joint statement. The consultation process included input, review, and approval from members of SYSTRA ANZ's senior leadership team. The directors of each subsidiary of SYSTRA ANZ Holdings Pty Ltd also reviewed and approved the Statement as part of this consultation.

This Modern Slavery Statement is signed by a responsible member of SYSTRA ANZ Holdings Pty Ltd.



Alana NEWBROOK
CEO of SYSTRA ANZ

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