

### OUR COMMITMENT

SYSTRA ANZ Holdings Pty Ltd (ACN 609 902 212) and all of its subsidiaries operating in Australia and New Zealand (together, 'SYSTRA ANZ') maintain zero tolerance towards slavery, servitude, forced or compulsory labour and human trafficking (modern slavery), and any violation of, and crime against fundamental human rights. This statement is made in relation to the *Modern Slavery Act 2018* (Cth) and outlines SYSTRA ANZ's actions to identify, assess, and address potential modern slavery risks within its business operations and supply chains. We are committed to implementing steps to ensure that there is no slavery or human trafficking within our own business or our supply chains. This policy is in addition to the SYSTRA ANZ Modern Slavery Statement.

### ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

SYSTRA ANZ recognises its responsibility to take a robust approach to slavery and human trafficking. This policy statement covers all activities of SYSTRA ANZ. The scope of our business has been defined as:

"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)."

Our supply chain consists of other professional service providers acting primarily as subconsultants together with suppliers of services and equipment to our offices.

SYSTRA ANZ primarily operates in Australia with some occasional project work in overseas locations.

We consider our business activities to be low risk in relation to slavery and human trafficking, however, through continual review and assessment of our current and new suppliers we will identify any areas where there may be higher risks.

### POLICIES AND PROCEDURES ON SLAVERY AND HUMAN TRAFFICKING

The following policies describe SYSTRA ANZ's approach to the identification of modern slavery risks and the steps taken to prevent slavery and human trafficking in our operations:

#### Corporate Social Responsibility

Social responsibility is an intrinsic element of our business decisions and culture at SYSTRA ANZ and globally, the SYSTRA Group General Policy summarises our core values supported by several

social responsibility commitments.

#### Ethics and Compliance Programme

- SYSTRA Group Business Ethics and Compliance Policy summarises our values, objectives, and commitments designed to ensure that we maintain our reputation and conduct our business with integrity.
- SYSTRA Group's Code of Ethics and Anti-Corruption Code of Conduct sets out our commitment to act ethically and with integrity in all our business relationships.
- We require our colleagues, subcontractors and supply chain to obey the law, observe regulations and guidelines and, irrespective of geographical location or position, remember that ethics, integrity, and loyalty in business practice and respect for others are not negotiable and not open to compromise.
- We have integrated our Code of Ethics and Anti-Corruption Code of Conduct across SYSTRA ANZ through compulsory online training for all colleagues.
- Our corporate ethics and compliance initiatives also involve mandatory procedures and tasks designed to build and strengthen SYSTRA ANZ's culture and reputation for integrity, such as the Business Partners Due Diligence procedure, and the Ethics Alert Process.
- The SYSTRA Business Partner Questionnaire requests information to verify that supply chain partners operate in a manner consistent with our core values on ethics, quality, safety, integrity and sustainability.

### EQUAL OPPORTUNITIES AND DIGNITY AT WORK

Our values and vision are core to the policies which all workplace participants of SYSTRA ANZ are expected to adhere to in relation to their employment. Particularly relevant policies and procedures include:

- The Diversity, Equity and Inclusivity Policy, and the Discrimination, Harassment & Bullying Policy set out our commitment to create a work environment free of harassment and bullying, where everyone is treated with dignity and respect
- The Grievance & Complaints Procedure provides a route for all employees to raise concerns within the workplace in a constructive and supportive manner.
- The Ethics Alert Process and Investigation Protocol provide all workplace participants of SYSTRA ANZ, with confidential access to raise any concerns that they may have about the interests of the organisation, of others, or any instances of malpractice within SYSTRA ANZ.

### CONTINUOUS IMPROVEMENT

SYSTRA ANZ is committed to continuous improvement in all its operations. We are committed to regularly reviewing and updating our policies, procedures, and training programs to strengthen our capacity to prevent and address unethical issues, including modern slavery.



ALANA NEWBROOK  
CEO - SYSTRA ANZ

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JEAN-CHARLES VALLERY  
CEO - SYSTRA

20/06/2025