QTECTIC
Partners in Rail

PCO-POL-0013

MODERN SLAVERY STATEMENT 2025

NGR PROJECT COMPANY PTY LTD ON BEHALF OF THE NGR GROUP



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1. Introduction

This Joint Modern Slavery Statement 2025 (Statement) is made on behalf of NGR Project Company Pty Ltd ATF NGR Project Trust in accordance with the requirements of the Australian Commonwealth Modern Slavery Act 2018 (Cth) (Modern Slavery Act) for the financial year ended 30 June 2025 (FY2024–25) (Reporting Period).

This is the sixth statement provided by NGR Project Company Pty Ltd atf NGR Project Trust under the Modern Slavery Act. The Statement covers the following entities:

- NGR Project Company Pty Ltd (ACN 166 706 332);
- NGR Project Trust (ABN 39 281 214 407);
- NGR Holding Company Pty Ltd (ACN 166 705 326);
- NGR Hold Trust (ABN 67 389 478 992);
- NGR Finance Holding Company Pty Ltd (ACN 167 241 223); and
- NGR Finance Pty Ltd (ACN 165 031 612).

(together, ***Qtectic*** or ***NGR Group***), each of which is a reporting entity under the Act.

The Statement outlines and reviews our approach to addressing modern slavery risks in our operations and supply chain. It describes the frameworks and processes that Qtectic has in place to minimise the risk of modern slavery in our business operations and supply chain.

We recognise that modern slavery can occur in many forms. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services. Given the global prevalence of modern slavery, we acknowledge the risk of modern slavery practices in our operations and supply chains. Qtectic is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our business. Qtectic is also committed to understanding and minimising the risk of modern slavery in its operations and supply chain.

Qtectic has formed a Modern Slavery Working Group that includes members from Finance, Human Resources and Operations. Furthermore, members of the Modern Slavery Working Group have engaged with legal and industry experts to keep abreast of learnings and evolving good practice in terms of understanding modern slavery risk, improving management of modern slavery risk, and engaging with our stakeholders including our Sponsors.

A summary of the actions Qtectic completed in FY2025 and our planned actions for the financial year ending 30 June 2025 are presented on pages 11 to 15 of this Statement.

2. Our Business

Qtectic is a special purpose entity established to execute the New Generation Rollingstock Project (***NGR Project***) for the State of Queensland acting through the Department of Transport and Main Roads (***TMR***).

The NGR Project is being delivered under a public private partnership model, and through this contract, the NGR Project consists of the following elements:

- Delivery of 75 new six-car passenger electric trains (Multiple Units);
- A purpose-built maintenance facility at Wulkuraka, Brisbane which includes a maintenance building, administration offices, decanting facilities, signalling yard control and train lifting jacks;
- Three NGR training simulators for train crew;
- Undertaking additional modifications to the Multiple Units to ensure functionality in line with the Disability Standards for Accessible Public Transport 2002 (DSAPT);
- Implementing the European Train Control System (ETCS) requiring the implementation of both on-board and trackside equipment; and
- Implementing Automatic Train Operations (ATO) and Platform Screen Doors (PSD) to enable operation within the Cross River Rail tunnel.

The NGR Project includes a concession period for the maintenance of the Multiple Units until January 2046.

In undertaking the NGR Project, Qtectic:

- Subcontracted the design, manufacture, supply, testing and delivery of the Multiple Units and other related equipment (including simulators) to a joint venture between Alstom Transport Australia Pty Ltd and IIIQ Pty Ltd (ITOCHU Corporation) (D&D Subcontractor);
- Subcontracted the design, construction, fit out and commissioning of the maintenance facility to the D&D Subcontractor, who in turn subcontracted the design and construction of the maintenance facility to Laing O'Rourke Australia Pty Ltd;
- Subcontracted the provision of availability and maintenance services to Alstom Transport Australia Pty Limited (A&M Subcontractor);
- Subcontracted the implementation of the Disability Standards for Accessible Public Transport modifications to Alstom Transport Australia Pty Ltd (DSAPT Contractor);
- Subcontracted the implementation of the ETCS modifications to Alstom Transport Australia Pty Ltd (ETCS Contractor); and
- Subcontracted the implementation of the ATO and PSD modifications to Alstom Transport Australia Pty Ltd (ATO/PSD Contractor).

Qtectic's role is to execute the NGR Project through the performance of its contractual obligations, which are achieved through the management of its subcontract relationships.

In performing that role, Qtectic's objectives are:

- To deliver customer satisfaction by ensuring that the quality of the works undertaken by Qtectic, and its subcontractors meets or exceeds the requirements of the agreement between Qtectic and the State of Queensland;
- To ensure Qtectic and its subcontractors comply with all relevant legislation and contractual obligations;
- To ensure Qtectic and its subcontractors minimise the environmental impacts associated with their activities, so far as is reasonably practicable; and
- To ensure Qtectic and its subcontractors prevent injury and illness to their employees and any other parties who could be affected by the project activities.

3. Our Structure and Operations

Qtectic is a special purpose vehicle established specifically to execute the NGR Project. The following entities hold 100% of the equity in the NGR Group:

- John Laing Investments (NGR) B.V.;
- IIIQ Pty Ltd;
- Aberdeen Infrastructure Investments (NGR) Ltd.; and
- Alstom Transport Australia Pty Ltd.

An overview of the NGR Group structure is outlined (and indicated in orange) below in Figure 1.

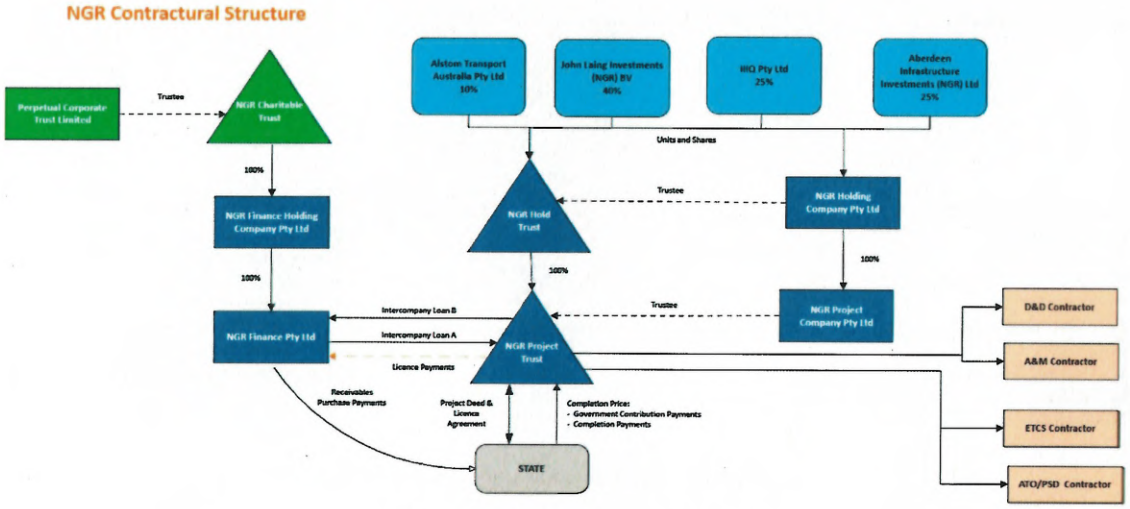

Figure 1 – NGR Contractual Structure

An overview of the NGR Project structure is outlined below in Figure 2.

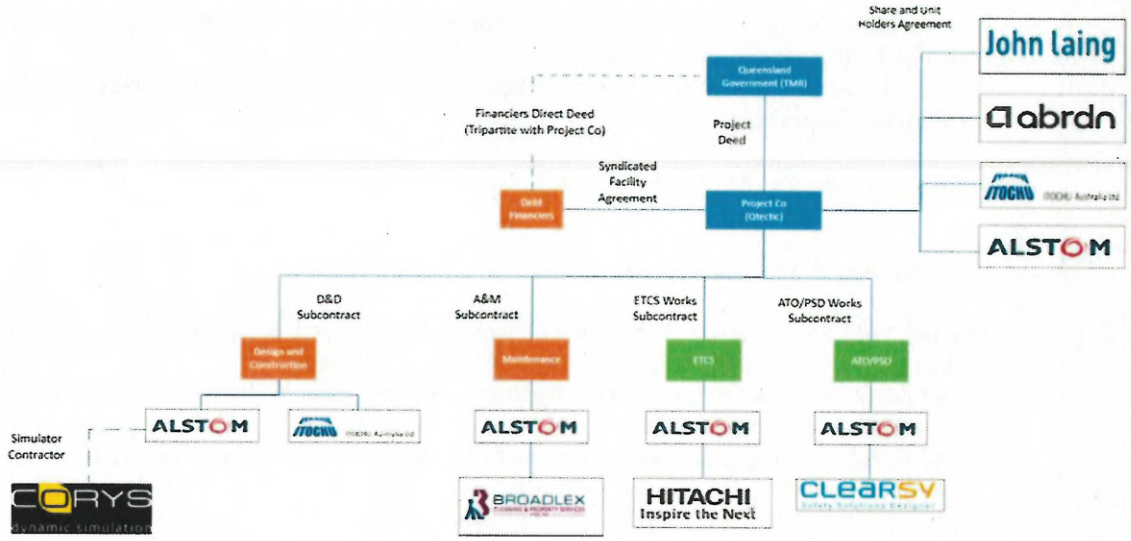

Figure 2 – NGR Project Structure

Qtectic's registered office is in Melbourne, Victoria. As of June 2025, Qtectic employed 21 people who are all based in Queensland, Australia. Of the employees, 17 employees a full-time and four are part-time. Qtectic does not directly utilise any external labour hire organisations.

The key functions and project activities of Qtectic are outlined below in Figure 3:

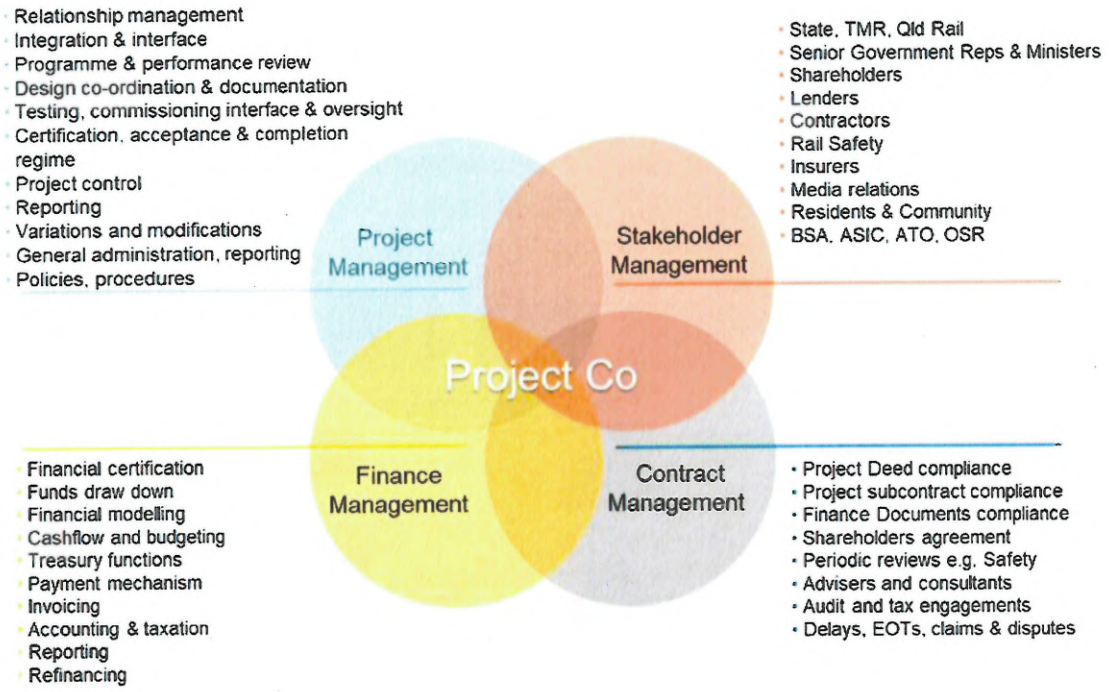

Figure 3 – Key functions and project activities

The NGR Project is delivered by Qtectic in two distinct phases:

Phase 1: Design & Delivery

- Design, manufacture, supply, test, and commission the Initial Fleet of Multiple Units (NGR Fleet) and other related equipment (including simulators); and
- Design, construct, fit-out and commission of the Wulkuraka Maintenance Facility in Wulkuraka, Queensland.

The design and delivery phase of the Project is now complete.

Phase 2: Availability & Maintenance Services

- Maintenance and overhaul of the NGR Fleet and associated equipment at the Wulkuraka Maintenance Facility and making these available to the State;
- Presentation services including daily cleaning, monthly cleaning and rectification of graffiti and vandalism acts on the NGR Fleet;
- Implementation of the Disability Standards for Accessible Public Transport modifications;
- Implementation of the ETCS modifications;
- Implementation of the ATO and PSD modifications; and
- Returning the NGR Fleet, equipment, and the Wulkuraka Maintenance Facility in the return condition on termination or expiry of the concession period.

The availability and maintenance services take place in Wulkuraka, Queensland.

The concession period expires in January 2046. NGR Project Company Pty Ltd atf NGR Project Trust is the only entity which engages with external suppliers.

Implementation of the ETCS on to the NGR fleet is continuing with several Multiple Units having been modified and returned to service.

The ATO/PSD modification is ongoing with the first train expected to have its modification completed in 2026.

4. Our Supply Chain

During the reporting period, Qtectic had four direct suppliers and eleven indirect suppliers. The direct suppliers provided train manufacturing and rollingstock maintenance services. The indirect suppliers provided a range of goods and services including:

- Simulators
- Train cleaning
- Braking systems
- Seats
- Sidewalls
- Doors
- Floors
- Main circuit
- Fire detection
- ETCS configuration
- ATO/PSD configuration

The majority of Qtectic 's suppliers are located in Australia. A small number of the suppliers are located in India, China, France, Switzerland, Germany and Japan, as noted in Table 1 below:

Key Subcontractors:

Description	Location	Direct or Indirect	Relationship (short term or long term)	Changeable or Stable
Train Manufacturer and Rollingstock maintainer	Global company	Direct	Long term	Stable
ETCS and ATO/PSD Subcontractor	Global company	Direct	Long term	Stable

Description	Location	Direct or Indirect	Relationship (short term or long term)	Changeable or Stable
Simulator manufacturer and maintainer	France	Indirect	Long Term	Stable
Train cleaning services provider	Australia	Indirect	Long Term	Stable

Description	Location	Direct or Indirect	Relationship (short term or long term)	Changeable or Stable
Braking system supplier	Germany	Indirect	Short Term	Changeable
GRP panels throughout train	India	Indirect	Short Term	Changeable
Passenger doors	China	Indirect	Short Term	Changeable
Floor covering and intercar doors	Germany	Indirect	Short Term	Changeable
Platform screen doors supplier	France	Indirect	Short Term	Changeable
CCTV provider	Austria	Indirect	Short Term	Changeable
Passenger information system	Melbourne	Indirect	Short Term	Changeable
Pantographs	USA	Indirect	Short Term	Changeable
Wheelset overhaul	Australia	Indirect	Short Term	Changeable
Coupler overhaul	Australia	Indirect	Short Term	Changeable
Decanting	Australia	Indirect	Short Term	Changeable

Table 1 – Location of Qtectic Suppliers

5. Modern Slavery Risk in our Operations and Supply Chains

Qtectic assessed the modern slavery risk in its operations and supply chain during the year. In addition, internal reviews were conducted by the Modern Slavery Working Group. This included formal meetings with the Qtectic executive leadership team who represent all aspects of the business, and formal meetings with key personnel from the Qtectic subcontractors.

5.1 Operations

Qtectic continues to consider that the risk of modern slavery in its operations is very low. Although Qtectic operates within sectors which are considered to have an elevated risk of modern slavery (i.e., construction, transportation, and cleaning), the following factors are also considered:

- Qtectic's operations are predominantly based in Australia, which the 2023 Global Slavery Index identifies as having a comparatively low prevalence of modern slavery by global standards, though risks remain, particularly in industries reliant on vulnerable and migrant workers;
- Qtectic's workforce is comprised of permanent employees who are covered under individual contracts. These arrangements have a very low risk of modern slavery as all employees are covered by the National Employment Standards (NES). Qtectic employment contracts not only meet but exceed NES and comply with workplace laws and regulations; and
- Qtectic has policies and procedures in place which are relevant to identifying, assessing and managing modern slavery risk (see section 6.2 below).

5.2 Supply Chain

To assess modern slavery risks within Qtectic's supply chain, the Modern Slavery Working Group conducted a risk assessment of Qtectic's primary supplier, Alstom (in its role as D&D Subcontractor, DSAPT Contractor, ETCS Contractor, and ATO/PSD Contractor). This included a review of Alstom's Modern Slavery Statement for the reporting period 1 April 2024 to 31 March 2025, which was approved on 30 September 2025. Qtectic considers the overall risk of modern slavery within Alstom's operations and supply chain to be low.

Qtectic identified the following potential modern slavery risk factors in relation to Alstom:

- Alstom operates within sectors recognised as having a higher risk of modern slavery, including construction, transportation, and the manufacture of electronic and electrical products.
- Alstom's products include components and materials that may originate from industries associated with higher modern slavery risks, such as electronics and electrical goods.
- Alstom has operations and supply partners in countries identified by the 2023 Global Slavery Index as having higher prevalence rates of modern slavery, although the majority of countries in which Alstom operates are considered low risk.

Qtectic also reviewed the controls implemented by Alstom to mitigate these risks, including its governance framework, Supplier Code of Conduct, relevant policies and commitments, risk management processes, and supplier onboarding practices—such as corporate social responsibility certification and whistleblowing mechanisms.

Based on publicly available information and Alstom's Modern Slavery Statement 2025, Qtectic considers that Alstom has robust measures in place to identify and manage modern slavery risks within its operations and supply chain.

Given the identified risk factors and Alstom's demonstrated controls, Qtectic concludes that Alstom presents a low overall risk of modern slavery. Qtectic will continue to collaborate with Alstom to enhance understanding of its supply chain risks and to monitor the effectiveness of its modern slavery prevention measures.

6. Assessing and Addressing Modern Slavery Risks

6.1 Oversight

Qtectic also acknowledges the establishment of the Australian Anti-Slavery Commissioner under the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024. The Commissioner provides national oversight and guidance to strengthen compliance with the Act, improve transparency, and support organisations to mitigate risks of modern slavery.

Qtectic has established a comprehensive governance process to provide Board oversight of its modern slavery risk and ensure compliance with reporting requirements under the Commonwealth Modern Slavery Act.

This governance framework includes the key elements noted in Table 2 below:

Element	Description
Modern Slavery Working Group	This group oversees the implementation of modern slavery policies and procedures, regularly reviewing and updating them to ensure effectiveness and compliance. It reports directly to the Board, providing updates on modern slavery risks and controls.
Governance Arrangements	Qtectic includes regular audits and reviews of modern slavery practices in its governance framework. This ensures continuous improvement and adherence to standards. Governance arrangements assign specific roles and responsibilities, ensuring accountability and transparency.
Supplier Code of Conduct	Qtectic requires all suppliers to follow a stringent code of conduct that includes commitments to prevent modern slavery. The code is regularly reviewed and updated to reflect best practices and regulatory changes.
Policies and Commitments	Qtectic has robust policies and commitments to combat modern slavery, including procedures for identifying and mitigating risks, as well as commitments to ethical sourcing and labour practices.
Risk Management Processes	Qtectic uses comprehensive risk management processes to identify, assess, and mitigate modern slavery risks within its operations and supply chains. This includes regular risk assessments and integrating modern slavery considerations into broader risk management frameworks.
Supplier On-boarding Practices	Qtectic's supplier on-boarding process includes rigorous checks to ensure new suppliers comply with modern slavery policies. This involves verifying suppliers' adherence to corporate social responsibility standards and conducting due diligence to identify potential risks.

Whistleblowing Mechanisms	Qtectic has established secure and confidential whistleblowing mechanisms to encourage reporting of any suspected modern slavery activities. These mechanisms are regularly reviewed to ensure they are effective and accessible.
Continuous Improvement	Since 2021, Qtectic has made several updates to its modern slavery governance process, reflecting the group's commitment to continuous improvement and adaptation to emerging risks and regulatory changes. This includes regular audits and reviews to identify areas for improvement and implement necessary changes.

Table 2 – Key Elements of Qtectic's Governance Framework

6.2 Our policies and procedures

Qtectic has a set of policies and procedures that articulate our values, ways of working and expectations for our team and suppliers. This policy framework aims to ensure that our team members and suppliers clearly understand our expectations, and equally that they can recognise when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint.

The policies that are most relevant to managing modern slavery risk in our operations and supply chain are noted in Table 3 below:

Policy / Procedure	Purpose (aligned to Australia's Modern Slavery framework)
Code of Conduct	Sets clear expectations for lawful, ethical behaviour, including respect for human rights; requires staff and contractors to avoid, identify and escalate modern slavery risks.
Whistleblowing Policy and Procedure	Provides safe, confidential channels for disclosures (internal and external), protects reporters from detriment, and links into the incident management and remediation process.
Responsible Procurement Policy	Embeds human rights due-diligence expectations into sourcing, onboarding and contract management (screening, risk rating, verification, ongoing monitoring) and supports future statutory due-diligence requirements flagged by Government.
Grievance Policy	Offers accessible, multilingual channels for workers (including supplier workers) to raise concerns; outlines assessment, investigation, remediation and feedback timelines; integrates with whistleblowing and supplier management.
Privacy and Confidentiality Policy	Safeguards personal and sensitive information gathered through due-diligence, investigations and remediation; supports safe handling of survivor information.
Environmental, Social and Governance Policy	Embeds human rights and ethical sourcing into broader sustainability and governance commitments.
Anti-Bribery and Corruption Policy	Prevents corrupt practices that could conceal or enable modern slavery in supply chains.

ESG Policy	Embeds human rights and ethical sourcing within broader ESG commitments, target-setting and reporting; aligns with continuous-improvement expectations in Government guidance.
Training & Awareness Framework	Mandates risk-based training for employees, procurement, project managers and key suppliers; includes onboarding and periodic refreshers; records participation to support reporting on effectiveness.
Board Oversight & Approval	Confirms governance and formal approval and sign-off of the Modern Slavery Statement.

Table 3 – Qtectic Policies

Qtectic reviews its policies and procedures regularly and, if necessary, updates them to ensure that policy framework is robust and minimises the risk of modern slavery in its operations and supply chain.

6.3 Review of FY2024-25 Activities in relation to Modern Slavery Risks

Qtectic's approach to assessing and addressing the risk of modern slavery in its operations and supply chain, and assessing the effectiveness of its approach, has been incorporated into the Qtectic compliance framework and processes. This aims to ensure that Qtectic has robust and effective processes that are firmly engraved in how it conducts business.

Table 4 below outlines Qtectic's work performed to date to address the risk of modern slavery:

Action	Work Performed	Status/Timing
1. Identify	A Modern Slavery Working Group was established in March 2021 to identify key modern slavery risks and requirements and oversee integration into existing risk and compliance functions. The Modern Slavery Working Group consists of the Finance Director, A&M Project Manager, Finance Manager and HR Manager. Highlights of the achievements of the Modern Slavery Working Group include: • Comprehensive Review: Analysed operations and supply chains to identify potential modern slavery risks. • Policy Integration: Incorporated modern slavery considerations into existing policies, including the Code of Conduct. • Awareness Training: Delivered training sessions for staff and suppliers to increase awareness of modern slavery risks and	The Modern Slavery Working Group met quarterly throughout the year. Quarterly updates were completed as part of the supplier risk review. Quarterly supplier risk reviews cover the following areas: • Examines the supplier's operational capacity and delivery reliability. • Assesses the supplier's financial health and ability to fulfill contracts. • Ensures the supplier adheres to relevant laws and regulations, including labor laws and modern slavery acts. • Reviews the supplier's reputation and any past issues, such as legal disputes or ethical concerns.

	company policies. • Reporting Procedures: Established secure whistleblowing mechanisms and procedures for reporting modern slavery concerns. • Regular Updates: Continually reviewed and updated modern slavery policies and procedures to align with best practices and regulatory changes. • Board Reports: Provided updates to the Board, ensuring transparency and accountability in managing modern slavery risks.	
2. Develop, document, and execute	Key activities undertaken in 2024-25 include: • Ensured that all relevant Qtectic policies and procedures included modern slavery considerations; • Communicated with suppliers based on risk factors through regular scheduled meetings. • Maintained staff awareness and capacity of staff to identify and report modern slavery associated risks through internal Lunch and Learns sessions. • Undertook external training and maintained communication in relation to modern slavery risk; and • Included modern slavery training as an employee performance objective.	Each of the activities committed to was undertaken in 2025.
3. Monitor risks	Reviewed risks identified by the supplier risk review, Alstom Modern Slavery Statement 2025 and any risks noted as part of internal reviews and audits undertaken. The supplier risk review involves a detailed analysis of the main suppliers to the Project, whether that be direct or indirect and whether any issues or concerns are identified from a financial, environmental or governance perspective including the risk of modern slavery. All staff formally acknowledged modern slavery training as part of mandatory training.	Supplier risk review is conducted on a quarterly basis. Alstom's Modern Slavery Statement 2025 was reviewed.

4. Report, escalate and assurance	Modern slavery reporting to the Board was undertaken at a minimum of twice a year throughout 2025. This included an overview provided by the Finance Director at the Board Meeting of the activities undertaken in the period and whether any issues have been identified and updates on legislative activity.	Completed
5. Assess effectiveness of the above actions	Modern Slavery Working Group met quarterly and ensured that internal controls remained up to date. The work included: • Review of findings from the supplier risk review; • Updates on meetings with key personnel from the Subcontractor • Review of legislative changes • Review of any past activities within the group (if any) that may have raised potential concerns • Updates on training within the Group to increase awareness of modern slavery risks • Review of potential training opportunities for the Modern Slavery Working Group to increase awareness of modern slavery risks	Completed

Table 4 - Work Performed to Date to Address the Risk of Modern Slavery

6.4 Planned Actions for FY2025-26

Table 5 below outlines the work Qtectic intends to perform to address the risk of modern slavery during FY2024-25:

Action	Work to be Performed	Status/Timing
1. Identify	• The Modern Slavery Working Group (MSWG) will continue to meet quarterly to identify, assess, and review key modern slavery risks and requirements. • Integrate risk identification into broader enterprise risk management and compliance programs. • Update risk mapping to reflect the latest Global Slavery Index 2023 and any sector-specific guidance issued by the Australian Anti-Slavery Commissioner.	• Ongoing – quarterly meetings scheduled for FY2025–26 • Integration planned for 2026, with updates made as required thereafter. • Review quarterly as part of supplier risk review and update as required.
2. Develop, document, and execute	• Key activities for FY2025–26 include: - Ensuring all group policies and procedures explicitly address modern slavery and human rights obligations. - Communicating expectations to subcontractors and suppliers based on identified risk levels. - Continuing to raise awareness among staff through modern slavery training and integrating training completion into employee KPIs and performance reviews.	• Supplier risk reviews – quarterly • Modern slavery induction for all new staff • Annual refresher training for all employees • Training completion tracked as a 2026 KPI
3. Monitor risks	• Conduct quarterly supplier reviews, including verification of corrective actions where risks are identified. • Integrate outcomes from supplier assessments into Qtectic's risk register and update relevant policies and procedures.	• Quarterly supplier reviews • Policy and process review throughout 2026
4. Report, escalate and assurance	• Provide modern slavery updates to the Board at least bi-annually, including risk findings, actions taken, and effectiveness metrics.	• Bi-annual reporting to the Board (minimum)

5. Australian legislation amendments going forward	• Monitor ongoing legislative reforms and guidance following the Government's December 2024 response to the Modern Slavery Act Review. • Anticipate the introduction of mandatory due-diligence obligations, civil penalties for non-compliance, and expanded reporting criteria. • Review Qtectic's Modern Slavery Statement, policies and procedures each quarter to ensure alignment with any new requirements or standards issued by the Australian Anti-Slavery Commissioner. • Provide governance updates to the Board on material changes and compliance readiness.	• Ongoing – Review and report quarterly or when needed to Board
6. Assess effectiveness of the above actions	• MSWG to review and evaluate the effectiveness of Qtectic's modern slavery controls quarterly using defined KPIs (e.g. supplier assessment coverage, training completion rates, remediation outcomes). • Develop an Effectiveness Evaluation Framework in FY2026 to meet anticipated statutory requirements for measuring and reporting on effectiveness. • Record all continuous improvement actions and their outcomes in the FY2026 Modern Slavery Statement.	• Quarterly MSWG meetings • Quarterly subcontractor engagement • Effectiveness framework in place by mid-FY2026

Table 5 – Work to be Performed in FY 2025-26

7. Joint Modern Slavery Statement

This statement was prepared by NGR Project Company Pty Ltd ATF for NGR Project Trust on behalf of the NGR Group. NGR Project Company Pty Ltd did not consider that formal consultation with the other entities in the NGR Group was necessary in preparing this statement. Each of the entities has the same Board of Directors and employees who are responsible for the management of all NGR Group entities. All NGR Group entities adhere to the policies and procedures described in this statement.

The Modern Slavery Statement was reviewed, discussed and approved by the Board on 12 December 2025.

Geoff Ingram

Chairperson of NGR Project Company Pty Ltd

Michael Chadwick

Chief Executive Officer of NGR Project Company Pty Ltd