

A close-up photograph of several industrial metal bolts and nuts. The bolts are arranged on a dark, textured surface, possibly a metal plate or a workbench. The lighting is dramatic, with strong highlights and deep shadows, creating a sense of depth and texture. The background is blurred, focusing attention on the foreground bolts.

Engenco

MODERN SLAVERY
STATEMENT 2025

Modern Slavery Statement

2025

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 2025 (FY25).

Although not all Engenco subsidiaries are required to report under the Act, the Engenco Group includes a voluntary report of its subsidiaries' actions in this joint statement for completeness and consistency, as all entities in the Engenco Group have adopted a shared approach to managing modern slavery risks.

The Engenco Group remains 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 accordance 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.

With a strong focus on customer service and providing sustainable solutions, and superior value the Group specialises in:

Engenco



- 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)
- Connect Talent Pty Ltd (ACN 163 081 114)

Our governance and policy framework

Guided by our vision of **inspired people creating sustainable transportation solutions** the Engenco Group is committed to conducting business with integrity, accountability and to the highest ethical standards.

Our governance framework promotes transparency, defines behavioural expectations, and outlines the mechanisms available to report concerns. 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 or safety, to prioritise value and celebrate innovation.

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 www.engenco.com.au/governance/.

Structure, business operations and supply chains

ENGENCO LIMITED

Engenco is a publicly listed company 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 40 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 agent in Australia and New Zealand 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 260 people across Australia with key operations in Forrestfield and Karratha (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 Gemco procures wagon components from suppliers operating from China.

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 6 people across New South Wales and South 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 rail and transport 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 office 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.

CONNECT TALENT PTY LTD (CONNECT TALENT)

Connect Talent is a proprietary limited company wholly owned by Eureka 4WD Training Pty Ltd (ACN 124 975 462) (Eureka 4WD). Connect Talent'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. Connect Talent employs approximately 10 people in New South Wales.

Connect Talent manage apprenticeships and traineeships, handling recruitment, training, and compliance. Connect Talent operates in New South Wales.

Connect Talent'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 continues to assess the risk of modern slavery within our operations and supply chain as low. All direct employees are engaged under written contracts of employment compliant with Australian legislation, and any applicable modern awards or enterprise agreements. Our policies and procedures ensure fair treatment, lawful employment and safe working conditions.

Throughout FY25 the Group remained vigilant in monitoring suppliers and maintaining awareness across all operations.

Internal awareness has been strengthened with the rollout of a mandatory Responsible Procurement online training program. This program reflects our ongoing commitment to operating with integrity and conducting business ethically, honestly, and legally. Delivered via the Group's learning management system, the training has equipped employees to recognise the signs of unethical practices and provide them with knowledge to prevent and respond to potential risks within our operations and supply chains.

All members of Engenco’s executive, leadership, sales, and procurement teams were required to complete the Responsible Procurement program. The training has helped to build awareness of modern slavery risks, supporting a responsible, and ethical workplace.

Furthermore, an assessment of the top 100 vendors was initiated to understand and evaluate potential modern slavery risks within our key supplier base. This review forms the foundation for a more comprehensive assessment to be conducted during FY26. From this initial review most suppliers were assessed to be at low risk of modern slavery due to being either local Australian-based companies or large international companies operating from countries with a low prevalence of and high government response to modern slavery.¹ Acknowledging the heightened risks in certain regions, Engenco maintains active oversight of these suppliers through regular audits and continued engagement.

Assessing effectiveness

Engenco remains committed to evaluating and managing modern slavery risks in our supply chain. Our ability to identify and mitigate modern slavery risks continues to be supported by our governance framework, internal training programs, and procurement practices.

The Engenco Group is not aware of any instances of modern slavery in its operations or supply chain during FY25. Nevertheless, the Group remains committed to continuously improving our systems, processes, and actions to identify, assess, and address modern slavery across the Group.

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

Looking Ahead

PRIORITIES FOR FY26

Our key priorities for the financial year ending 30 June 2026 (FY26) include:

- Undertaking a modern slavery survey with the Group's top 100 vendors to assess our supply chain's policies, commitments, and practices for managing modern slavery risks.
- Reviewing and updating the Modern Slavery Policy and Supplier Code of Conduct to incorporate lessons from the vendor review and evolving best practice.
- Maintaining vigilance through regular monitoring of high-risk supplier categories and regions.
- Continuing to collaborate 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 December 2, 2025.



Kelly Elphinstone
Chair - 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

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