

# Modern Slavery Statement 2023





## CEO message

*Modern Slavery is a human rights issue, present in the regions where we operate: Australia and North America. On any given day, around 49.6 million people are in modern slavery according to current global estimates.<sup>1</sup> For context, that's around twice Australia's current population.*

Modern slavery can exist in everyday business activities, so it is imperative that all organisations act on and support the eradication of modern slavery. Our business procures a wide variety of goods and services so monitoring the risks to people in our supply chain is key.

This is our fourth Modern Slavery Statement, published in accordance with the Modern Slavery Act 2018 (Cth) (**Act**), for the financial year ending 30 June 2023 (**FY23**). It details the risks of modern slavery in our operations and supply chain, and the actions taken by us to address those risks. Some of our actions for this reporting period included:

- delivering tailored, region-specific modern slavery practices training (Australia and the United States)
- delivering detection training to Traffic Control Room Officers (**TCROs**) (United States)
- delivering training to key suppliers such as incident response crews (Australia)
- collaborating with industry to conduct a pilot mapping exercise tracking the supply chain journey of bitumen (a material used

in asphalt) right down to its component parts – enabling a clearer picture of where modern slavery risks may occur (Australia)

- enhancing our due diligence (how we assess, integrate and track actions) by evaluating 70 suppliers, including 48 high risk category and high-spend suppliers via an internally developed assessment tool.

As was the case in previous reporting periods, in FY23 Transurban did not identify any instances of modern slavery in our operations or supply chain or on our roads. We acknowledge this does not mean modern slavery was not present. We are evolving our ability to identify actual and potential modern slavery instances in our operations and supply chain and on our roads. We will continue to work diligently with our suppliers and the wider industry to share learnings and encourage actions to combat modern slavery.

A handwritten signature in black ink, appearing to read 'Michelle Jablko'.

**Michelle Jablko**  
Chief Executive Officer

<sup>1</sup> [International Labour Organization, Walk Free, and International Organization for Migration, Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, 2022, p2](#)

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## Acknowledgment of Country

Transurban acknowledges the Traditional Owners of the lands across Australia – in particular where we own and operate toll roads – and we pay respect to Elders past and present.

As caretakers and custodians of transportation in urban communities we have a deep respect for First Nations communities and culture and seek to celebrate pride in Country through engagement with, and providing opportunities for, Aboriginal and Torres Strait Islander peoples. We also celebrate connection to Country through artwork and design elements in our infrastructure.

To achieve our purpose – to strengthen communities through transport – we will continue to foster positive and sustainable relationships with all communities, while progressing our efforts to contribute to Australia’s reconciliation journey.

## Reporting suite

### Corporate Report<sup>1</sup>

Transurban’s holistic performance for FY23, including our financial statements.

### Corporate Governance Statement

Statement made in accordance with the ASX Corporate Governance Council’s Corporate Governance Principles and Recommendations (4th Edition) for FY23.

### Modern Slavery Statement (this report)

FY23 overview of how we identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

### Results Presentation

Management presentation of FY23 financial and non-financial results, including non-statutory analysis.

### Sustainability Data Pack

FY23 data sets for sustainability metrics, including GRI, SASB, and TCFD indices, and our progress against the UN SDGs.

### Tax Transparency Report

Overview of our corporate structure, approach to tax and tax position for FY22.

 **All available on our website [transurban.com](https://transurban.com)**

*Reporting entity – This Modern Slavery Statement (Statement) is published in accordance with the Modern Slavery Act 2018 (Cth) (Act). As was the case in the previous reporting period, this is a joint statement by each of the reporting entities under the Act within Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group, as defined in Appendix A. For the purposes of this Statement, ‘Transurban’ collectively refers to Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group. The WestConnex Group, Sydney Transport Partners (STP) and NorthWestern Roads Group (in which Transurban holds an interest) will be lodging their own Modern Slavery Statements under the Act. The Transurban Sustainable Procurement Program (Program) has been deployed across the WestConnex Group (owned and controlled by STP) and is being managed by the Transurban-led procurement team. As a result, there is a substantial amount of overlap across each of these statements.*

*The expressions ‘we’, ‘us’, ‘our’ are used where reference is made in general to Transurban. Unless explicitly identified otherwise in this Statement, Transurban operates using group-wide policies and procedures to assess and address modern slavery risk.*

*Risk definition – Unless stated otherwise, all references to “risks” within this Statement refer to modern slavery risks to people. For more information on Transurban’s corporate and sustainability risks and responses see our [FY23 Corporate Report](#).*

<sup>1</sup> Our sustainability reporting is integrated in the FY23 Corporate Report, including our climate change disclosure

## FY18

Transurban Sustainable Procurement Program established and aligned to ISO 20400:2017.

Commenced working with our suppliers in anticipation of the Act being passed through Parliament.

## FY19

Joined the UN Global Compact Network Australia's Modern Slavery Community of Practice.

Partnered with the Infrastructure Sustainability Council (ISC) to establish the Modern Slavery Coalition.

## FY20

Established a leadership role dedicated to Sustainable Procurement. Implemented new policies, procedures, and contractual terms to better address our risks.

Our people and supplier partners engaged in modern slavery awareness training and workshops.

## FY21

Published our inaugural Modern Slavery Statement (FY20).

Developed an operations pilot program to support our incident responders to better identify and respond to potential instances of modern slavery within our road asset operations.

## FY22

Published our second Modern Slavery Statement (FY21).

Reviewed and strengthened tools and processes used to assess and address modern slavery risks.

Piloted first responders training to identify and escalate potential or actual instances of modern slavery.

## FY23

Embedded the use of our purpose-designed in-house supplier evaluation tool.

Piloted supply chain mapping study of bitumen to deepen our understanding of modern slavery risks.

Continued to expand training and build capacity in our operations and our supply chain.

# FY23 in review

*Modern slavery involves the exploitation of humans,<sup>1</sup> and Transurban recognises that we have a responsibility to respect human rights including freedom from all forms of abuse that make up modern slavery.*

This Statement details the risks of modern slavery in our operations and supply chains and our approach and actions taken to assess, prevent and mitigate those risks.

We continue to improve our understanding and mitigation of modern slavery risks within our operations and supply chain. During FY23 our actions included:

- reviewing our efforts to date to assess and address modern slavery risks
- integrating existing actions and tools into our operations to improve their efficacy, such as improving our training, processes and controls within our Contract Management Framework
- increasing our people's awareness, engagement and capabilities through targeted training and industry collaboration
- tracking our progress and transparently disclosing our risks and actions, including the implementation of our due diligence evaluation tool (see case study on page 20).

We also acknowledge that modern slavery could occur on our roads, and therefore, we include actions to identify these potential instances. We have provided specialty training to teams monitoring our roads to identify potential indicators of modern slavery and educated targeted suppliers in potential modern slavery risks and harms, not just on our roads, but in the wider community.

## FY23 key actions

Key actions for this reporting period included:

- evaluated 70 of our suppliers, including 48 priority (high-risk category and high-spend) suppliers, against tailored modern slavery response criteria developed by Transurban
- piloted, in Australia, a supply chain mapping study of bitumen (bitumen is an ingredient in asphalt, a key road-construction material) including, where possible, identifying suppliers of bitumen's component parts (such as crude oil) to increase visibility of the supply chain and potential risks
- delivered tailored training to our United States TCROs, including raising awareness and knowledge of the types of modern slavery and how to identify potential or actual situations of human trafficking such as trucking debt-bondage<sup>3</sup>
- partnered with suppliers, including non-reporting entities, to increase awareness of modern slavery risks and potential indicators
- updated our key modern slavery related policies, including our [Human Rights Policy](#) and [Supplier Sustainability Code of Practice](#)
- supported one of our non-controlled joint-venture entities to formalise modern slavery criteria within project contracts, including requirements to complete a modern slavery risk assessment, regular reporting and making a grievance channel available to its workforce.

**0 instances of modern slavery** detected in our operations or supply chains

*Detection challenges and risks remain and we continue working to mitigate both*

**More than 99% of direct spend** was with Tier 1 suppliers<sup>2</sup>

*Located in the countries where we operate – Australia, Canada and the United States*

**Key suppliers and personnel trained** in identifying and reporting potential or actual human trafficking on our motorways

*Continued our training program, extending and tailoring it to our US traffic control room officers and key suppliers*

**70 suppliers evaluated** on their modern slavery efforts using a purpose-designed in-house evaluation tool

*Evaluations included 48 priority high-risk category and high-spend suppliers*

<sup>1</sup> <https://www.walkfree.org/what-is-modern-slavery/>

<sup>2</sup> A Tier 1 supplier is a supplier directly contracted by Transurban

<sup>3</sup> [Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers](#)

# About Transurban

*As one of the world's leading toll-road developers and operators, our business is to get people where they want to go, as quickly and safely as possible. Our employees, based in Australia, Canada and the United States, work in partnership with governments, suppliers and business partners to deliver major infrastructure projects and operate roads. We seek to foster an engaged and diverse workforce that prides itself on making significant and lasting contributions to the cities and communities in which we operate.*

## Sustainability focus and reporting

We are increasingly integrating sustainability into our business strategy, planning, operations and supply chain management activities. We also work to make meaningful contributions to the United Nations' Sustainable Development Goals (UN SDGs). Assessing and addressing both human rights impacts and our modern slavery risks are important parts of this work.

Our [FY23 Corporate Report](#) details our progress against the nine UN SDGs that we think are relevant to our business.<sup>1</sup>



Refer to our [FY23 Corporate Report](#) for information on our social and sustainability performance.

## Our values

**Transurban's values set the agenda for the way we work and how we interact with all our stakeholders.**

- Integrity
- Collaboration
- Accountability
- Ingenuity
- Respect

Together these values set the foundation for our work on modern slavery risk management and, more broadly, our overall respect for human rights.

Our purpose – to strengthen communities through transport – informs our approach to human rights, and our approach to communities generally. We continually challenge ourselves in how we respond to social issues and to create social inclusion.

22

assets in operation

4

major infrastructure projects in development

2.4M

trips daily across our roads

10.2M

customers globally

1996

listed on the Australian Stock Exchange

2nd

highest-rated motorway infrastructure company, GRESB 2022

>340km

roads, tunnels, bridges and ramps

<sup>1</sup> Content in this Statement has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States. Visit the [UN Sustainable Development Goals](#) website for more information

# Our structure and operations

Figure 1: Summary of our structure and operations as at 30 June, 2023

- Road asset
- 🏗️ Project
- 📍 Click the location names for detailed maps and information

<b>📍 Montreal, Canada</b> One office site		
● A25	50%	Transurban
	50%	CDPQ
<b>📍 Greater Washington Area, United States</b> Two office sites		
● 495 Express Lanes	50%	Transurban
	25%	AustralianSuper
	15%	CPP Investments
	10%	UniSuper
● 95 Express Lanes	50%	Transurban
	25%	AustralianSuper
	15%	CPP Investments
	10%	UniSuper
● 395 Express Lanes	50%	Transurban
	25%	AustralianSuper
	15%	CPP Investments
	10%	UniSuper
🏗️ Fredericksburg Extension	50%	Transurban
	25%	AustralianSuper
	15%	CPP Investments
	10%	UniSuper
🏗️ 495 Express Lanes Northern Extension	50%	Transurban
	25%	AustralianSuper
	15%	CPP Investments
	10%	UniSuper



**Brisbane, Australia** Four office sites and one depot

● Gateway Motorway	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● Logan Motorway	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● Clem7	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● Go Between Bridge	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● Legacy Way	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● AirportlinkM7	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● Inner City Bypass	100%	Brisbane City Council
<i>Transurban's role: Managing operations, maintenance and incident response</i>		
● Toowoomba Bypass, South East Queensland	100%	Department of Transport and Main Roads
	<i>Transurban's role: Tolling as a service on behalf of the Department of Transport and Main Roads</i>	

**Sydney, Australia** Nine office sites and one depot

● M5 West	100%	Transurban
● Hills M2	100%	Transurban
● Lane Cove Tunnel	100%	Transurban
● Cross City Tunnel	100%	Transurban
● Eastern Distributor	75.1%	Transurban
	14.37%	IFM Investors
	10.53%	UniSuper
● Westlink M7	50%	Transurban
	25%	CPP Investments
	25%	QIC Limited
● M8	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
● M4	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
● M5 East	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
● M4-M8 Link	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
● Rozelle Interchange <sup>1</sup>	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
● NorthConnex	50%	Transurban
	25%	CPP Investments
	25%	QIC Limited
● M7-M12 Integration Project	50%	Transurban
	25%	CPP Investments
	25%	QIC Limited

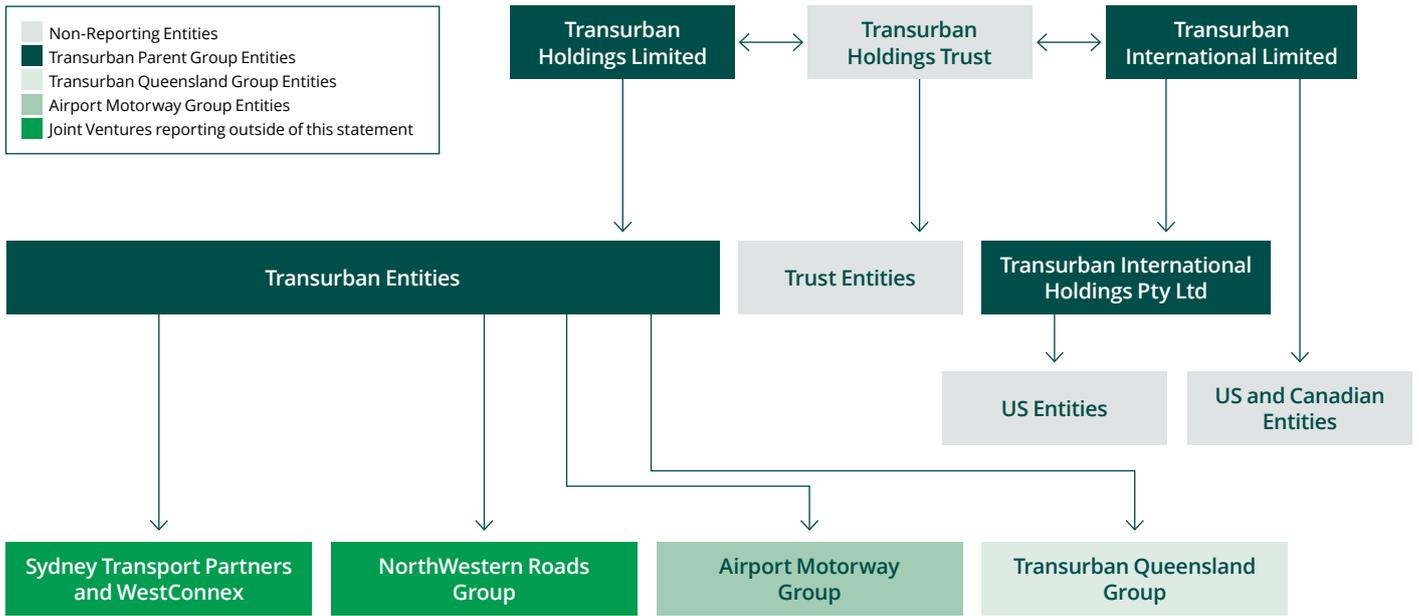
**Melbourne, Australia** Three office sites and one depot

● CityLink	100%	Transurban
● West Gate Tunnel Project	100%	Transurban



<sup>1</sup> Rozelle Interchange is 100% funded and delivered by Transport for NSW with handover to WestConnex to operate upon completion

Figure 2: Corporate structure (Transurban summary)



## Our corporate structure

Transurban road assets are, in general, owned and operated through individual subsidiary companies and are linked to a trust structure.

Transurban operates under a stapled structure. Our triple-stapled securities trade on the ASX under the code TCL. Each stapled security comprises a share in Transurban Holdings Limited (**THL**); a unit in Transurban Holdings Trust (**THT**); and a share in Transurban International Limited (**TIL**). Each THL and TIL share and THT unit is quoted and traded as a single security on the ASX. They cannot be traded separately. Controlled entities within Transurban include corporate entities domiciled and incorporated in Australia, the United States and Canada.

The Board of Transurban Group comprises each of the boards of directors of THL, TIL and Transurban Infrastructure Management Limited (**TIML**), as the responsible entity of THT, which have common directors and meet concurrently. They are collectively referred to as the **Board** in this Statement, unless otherwise indicated.

Each of the three groups that comprise Transurban for the purpose of this Statement (Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group) are overseen by a board of directors. However, the Board has oversight of the Transurban Group in its entirety and the Board has direct responsibility for all applicable reporting entities.

For the purposes of reporting under the Act, in FY23, Transurban had 21 reporting entities. Individual reporting entity information is provided in Appendix A.

In early 2023, we reached an agreement to introduce CDPQ, a global investment group, as a 50% partner in our A25 asset in Canada, bringing along a strategically aligned and well-respected Quebec-based partner. This is the second partnership between Transurban and CDPQ since joining STP as part of WestConnex.

### Statement coverage

As stated above, this Statement covers Transurban Parent Group, Transurban Queensland Group, and Airport Motorway Group. Transurban Parent Group, Transurban Queensland Group, and Airport Motorway Group develop projects and manage motorways via shared systems and risk management processes, and use similar operating approaches, including in how they work with supply chains.

### Transurban Parent Group

For the purposes of this Statement, 'Transurban Parent Group', refers to the stapled entities, THL, TIL and TIML as the responsible entity of THT, as well as the following subsidiaries: CityLink Melbourne Limited; The Hills Motorway Limited; and Interlink Roads Pty Limited.

Transurban Parent Group, under the entity TIL, owns or controls entities in the United States and Canada.

See Appendix A for further details regarding the reporting entities held by Transurban Parent Group.

### Transurban Queensland Group

Transurban Queensland Group forms part of the wider Transurban corporate group and operates toll roads in Queensland, Australia. Transurban Queensland Group is owned by a consortium comprising Transurban (62.5%), AustralianSuper (25%) and Tawreed Investments, a wholly owned subsidiary of the Abu Dhabi Investment Authority (12.5%).

See Appendix A for further details regarding the reporting entities held by Transurban Queensland Group.

### Airport Motorway Group

Airport Motorway Group includes Airport Motorway Pty Limited, the owner and operator of the Eastern Distributor Motorway in Sydney. Airport Motorway Group is a joint venture between Transurban (75.1%), IFM Investors (14.37%) and UniSuper (10.53%).

See Appendix A for further details regarding the reporting entities held by Airport Motorway Group.

For more information on our operations, including our executive team and assets, see our [FY23 Corporate Report](#).

### External lending activities

Transurban does not lend money to third parties. We do, however, have minority investments in non-core road operating assets.

## Our operations<sup>1</sup>

We work in partnership with governments, business partners, suppliers and other stakeholders to build and operate toll roads that benefit our customers and the communities in which we operate. Our toll roads serve as key transport connections for people and freight in major cities and regions across Australia, the United States and Canada.

We currently operate<sup>1</sup> more than 340 kilometres of road infrastructure which includes open roads, tunnels, bridges and ramps.

In FY23, the M4-M8 link tunnels (Sydney) opened to traffic. Operated by Transurban for STP, these tunnels are now helping motorists save up to 40 minutes in travel time, including avoiding 52 sets of traffic lights.<sup>2</sup>

Together with our suppliers, we manage the maintenance and operations of toll roads over concession periods, currently with a weighted average of 28.7 years. At the conclusion of the applicable concession period, assets are handed back to the relevant government.

Beyond the road infrastructure we build and operate, we also deliver parks, cycling and pedestrian paths, playgrounds and public art.

We collaborate with our contractors and subcontractors to develop our projects in line with applicable government technical and social procurement requirements. Once a newly built road is commissioned into service (including being integrated into the wider road network) we operate the road using state-of-the-art technology designed to support safe and efficient traffic flows.

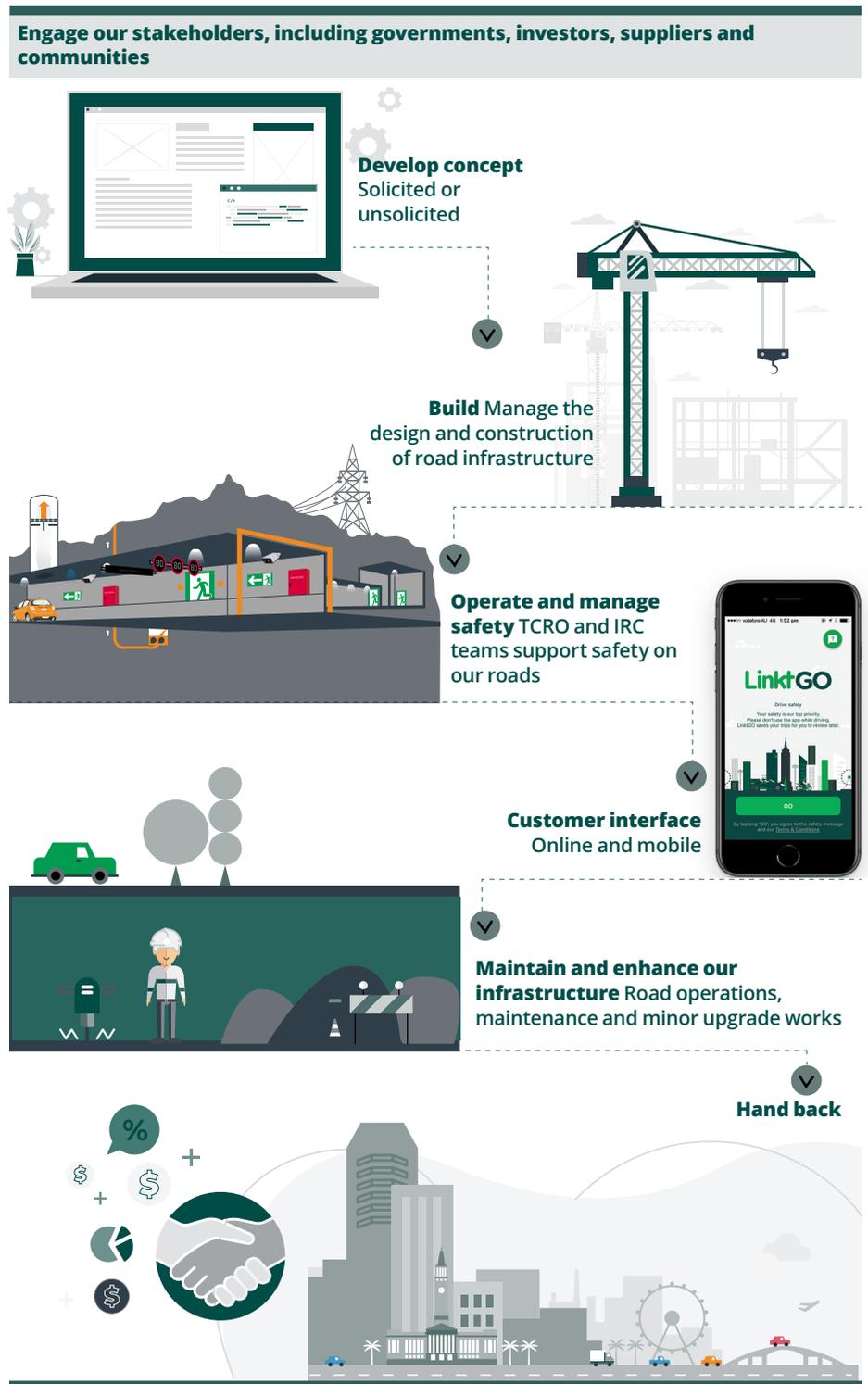
TCROs monitor our roads 24/7 via technology such as CCTV and road sensors. Incident response crews also operate 24/7, responding to incidents within minutes and helping maintain safe and efficient operations while also supporting impacted customers.

Our operational governance, including relevant policies and processes, is described on page 15.

### Customer experiences

Our customers largely manage their toll accounts online or via mobile apps, where they can access information on toll pricing, trip costs and tolling points. Using Trip Compare in Sydney and Melbourne, customers can additionally compare time savings, road incidents and Co2 emissions. Transurban's customer brands are shown in Figure 5 on the right.

Figure 3: Asset lifecycle overview



Transurban may also acquire concessions of existing roads assets, or be engaged by governments to operate their owned assets under contract

Figure 4: Our retail brands



<sup>1</sup> In this Statement, "operations" refers to actions undertaken by our direct workforce, including employees and managed contingent workers. Suppliers and people engaged to provide support services that may interact with our operational teams (such as cleaning contractors) are included and referenced in our supply chain

<sup>2</sup> Customers can save up to 40 minutes on a peak period trip between Parramatta and Mascot. TomTom Data, average travel time saved per hour when using WestConnex eastbound and M4-M8 link tunnel southbound (monthly average workday)

# Our people

*Transurban's direct workforce comprises more than 3,900 people across Australia and North America. Our people work flexibly, primarily from our 22 corporate offices<sup>1</sup> and site locations<sup>2</sup> as well as remotely. Job functions include: toll road operations and maintenance; major road project delivery; customer service; and head office functions (including corporate affairs; customer and technology; facilities; finance; health, safety and environment; legal; people and culture; procurement; risk; and sustainability).*

## Employment standards

Our workforce predominately comprises highly skilled workers. In Australia, our employees are covered by industrial instruments including: modern awards; enterprise agreements; and individual employment contracts. All instruments meet or exceed the 10 minimum entitlements that must be provided to all Australian employees as prescribed under National Employment Standards.

## Skilled workers

During FY23, Transurban employed 125 visa-holders – skilled migrant workers who are directly employed by Transurban. This means these employees have the same entitlements as Transurban's domestic-resident employees, including: access to grievance channels; training in using these mechanisms; and options for raising concerns anonymously.

More than

# 3,900

people in our direct workforce<sup>3</sup>

# 90:9:1

percentage of direct employees across Australia, US and Canada

# 92:6:2

percentage of full-time, part-time and casual direct employees

# 125

direct employees who are visa holders<sup>4</sup>

<sup>1</sup> Four sites are operationally managed by external organisations. Transurban employees may also operate from other sites on connected asset networks other than these Transurban-managed sites

<sup>2</sup> Sites include depot locations that are not offices

<sup>3</sup> As at June 30, 2023. Direct workforce includes direct employees (which include casual, fixed term and permanent employees (excluding leave of absence and Non-executive Directors)), temporary workers and workers contracted through our partner organisations

<sup>4</sup> Valid visa types with permission to work. Remaining direct employees have appropriate working rights through citizenship or permanent residency

# Our supply chain<sup>1</sup>

We have 22 assets in operation and have four projects in development or delivery. In our work, we partner with a diverse range of suppliers including multinational construction contractors, key technology providers, consultants and local and social enterprises.

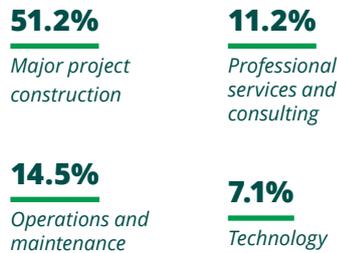
Our supply chains are complex networks of large, medium and small businesses providing goods and services. Our procurement activities encompass many aspects of the lifecycle of major road infrastructure, including design and construction and operations and maintenance.

In FY23, our major procurement activities included tunneling works on the West Gate Tunnel Project (Melbourne), completed in May 2023, and installation of new pacemaker lights in CityLink's Burnley Tunnel (also in Melbourne). Further, a new Transurban operated road, the M4-M8 link tunnels (Sydney) opened to traffic in January 2023.

Asphalt is a common material used in our major project construction and maintenance activities, which was a factor in

a bitumen-supply-chain mapping exercise led by Transurban this year. (Bitumen is an ingredient used in manufacturing asphalt). See the case study on page 12.

Our top supply chain categories remained largely the same as the previous reporting periods. In FY23, these top supply chain categories (comprising more than 84% of our total spend) were:



More than  
**\$1.8B**  
in annual managed spend

**1,600+**  
direct suppliers

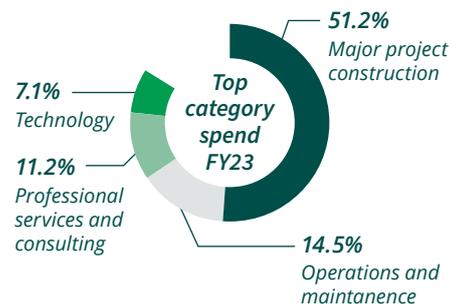
More than  
**90%**  
spend with Australian suppliers

**150+**  
Tier 2<sup>2</sup> suppliers identified during the reporting period

Figure 5: Spend by Region



Figure 6: Spend by Category



<sup>1</sup> All data in this section excludes the WestConnex group

<sup>2</sup> Tier 2 suppliers are suppliers contracted to our Tier 1 suppliers, where Transurban does not have a direct contractual relationship

Category	Activity	Suppliers	Typical activities
<b>Major project construction</b> 	Design and construction (D&C) of new or enhanced roads	Selected D&C suppliers Supplier subcontractors	<b>Heavy works:</b> drilling; pilling; excavation; tunnel boring <b>Mechanical and electrical:</b> wiring; lighting; pumps; jet fans; installing deluge, ventilation and Intelligent Transport Systems (ITS) <b>Management:</b> project and engineering <b>Other:</b> wire mesh; shotcrete, precast and in-situ concreting; asphalt laying; painting
<b>Operations and maintenance</b> 	Maintaining road safety and operating standards in line with mandated requirements	Selected incident response and maintenance suppliers Supplier subcontractors	Operations and maintenance activities are tailored to each road and include civil, mechanical and electrical works and incident response services. Suppliers may appoint subcontractors to deliver some activities. Road maintenance works may involve some of the construction activities listed under 'Major project construction' above.
<b>Professional services and consulting</b> 	Delivering services to corporate management	Selected consultants Legal services	Desktop-based specialist services including: legal support; strategy development; general business and financial consulting.
<b>Technology</b> 	Providing hardware, software and technical expertise	Selected technology suppliers	Information and communications technology hardware; ITS hardware and software; technology consulting, maintenance and support; software (including application licenses) for our head office and operations (including mobile applications).

Consistent with the previous reporting period, we used approximately 450 alternate suppliers<sup>1</sup> during FY23 compared with FY22, representing less than 5% of our total spend.

In FY23, more than 99% of our annual spend was with suppliers with direct trading sites or headquarters in Australia, the United States or Canada (Figure 6). However, we recognise that modern slavery risks may be greater further upstream of the suppliers we directly engage and we are starting to assess these risks by tracking Tier 2 suppliers and the types of vulnerable labour which may be used upstream.

### Labour in our supply chain

Labour is a critical part of our supply chain and includes both direct and indirect labour, particularly in providing:

- road maintenance services (such as landscaping, electrical and mechanical trades, incident response services and machinery operators)
- multi-year infrastructure construction delivery (such as truck drivers, labourers in asphalt paving and civil contractors).

Some labour is provided by casual or migrant workers, with labour sometimes delivered in shifts, such as 24/7 tunnelling works or incident response. Further, road maintenance works are often delivered overnight to mitigate disruptions for road users.

In FY23 we began identifying and tracking migrant labour in our supply chains through the implementation of our supplier evaluation tool (see case study on page 20).

### Managing our supply chain

As described in the previous reporting period, centralised project, operations and divisional teams manage Transurban's major project supply chain and operational procurement activities. Our procurement policies and procedures establish how we and our suppliers work together, including how we assess and address modern slavery risks. See Governance section on page 15.

### Extended supply chains beyond Tier 1

The level of knowledge we have about our extended supply chains beyond our direct-contracted (Tier 1) suppliers varies. In some cases our Tier 1 suppliers are required, through our commercial arrangements, to disclose and report subcontractors, including the labour force used.

During the FY23 reporting period we began to capture more information about Tier 2 suppliers providing services to our major projects. This year we identified over 150 Tier 2 suppliers. Using our internally developed supplier evaluation tool, we have begun to capture information including:

- the countries these suppliers are exposed to in their operations and supply chains
- the raw materials in their supply chains
- their modern slavery risks.

We will use this information to: continue ongoing assessment of the saliency of modern slavery risks; collaborate across more of our supply chain ecosystem; and adapt our actions to reduce risk.

### Transurban entities without supply chains

Transurban's structure includes multiple entities (for example, reporting entities) that do not engage with suppliers to purchase goods or services and have no direct supply chain exposure to modern slavery risks.

<sup>1</sup> Alternate suppliers include new suppliers, as well as others who may have been used by Transurban's entities in prior years and previously onboarded

# Case Study: Mapping the bitumen supply chain

During FY23, Infrastructure Sustainability Council’s Modern Slavery Coalition members (including Transurban) conducted a pilot bitumen supply chain mapping study. Bitumen is an oil-based derivative used to bind the asphalt used in road construction – including by coalition members.

The study was designed to gain, to the fullest extent possible, an overall picture of Australia’s bitumen supply chain, and to use this detailed information to confirm or reassess our current understanding of inherent modern slavery risks in the bitumen supply chain. It was delivered by the coalition’s Bitumen Working Group.

To begin, we identified key global and domestic suppliers, including suppliers of the raw materials used in bitumen manufacture. The group baselined current modern slavery risks and controls from available sources, including: Modern Slavery Statements published on the Australian Government’s [Modern Slavery Register](#); the [Global Slavery Index \(GSI\)](#); and the [2023 US Trafficking in Persons report](#).

Initial desktop research (including using the modern slavery register) identified previously unknown organisations potentially involved in the bitumen supply chain. Engagement with identified suppliers followed. In some cases, this was challenging, with some suppliers having varying levels of appetite for study participation. Participating suppliers shared valuable insights and enabled more detailed mapping of the bitumen supply chain than previously understood. Further, the participants’ positive initial engagements had a cascading effect on transparency further upstream in the supply chain, with information shared driving more open communication.

Our research and engagement identified:

- four bitumen supply chain levels (Tiers 1 to 4) generally located within Australia

- imported bitumen materials’ likely countries of origin, including differences depending on the bitumen manufacturing process (for example, offshore refining)
- other actors involved in the value chain, such as logistics companies, who do not own the supplied materials but are involved in their supply.

### Mapping exercise outcomes

This pilot study enabled validation of some initial assumptions about the level of modern slavery risk in the bitumen supply chain. It also identified some changes to the inherent risk profile.

Prior to the mapping, existing information indicated a large percentage of bitumen material imported into Australia originated from Singapore, Malaysia and China. However, the group’s desktop research and supply chain engagement did not identify China as a material source country for bitumen – a change from the original baseline.

Supplier engagement also led to new distinctions in understanding about imported bitumen and raw bitumen materials:

- imported bitumen – a finished good manufactured in line with Australian standards was primarily imported from South East Asia, including from Singapore, Thailand and Korea
- imported raw materials (that is, oil derivatives) – imported into Australia for use in local bitumen processing facilities – were more likely to originate from Middle Eastern countries.

This refined the group’s understanding of bitumen’s geographic risk factors, depending on whether it was locally manufactured or imported. Assessing these country of origin learnings against the GSI risk data suggested that:

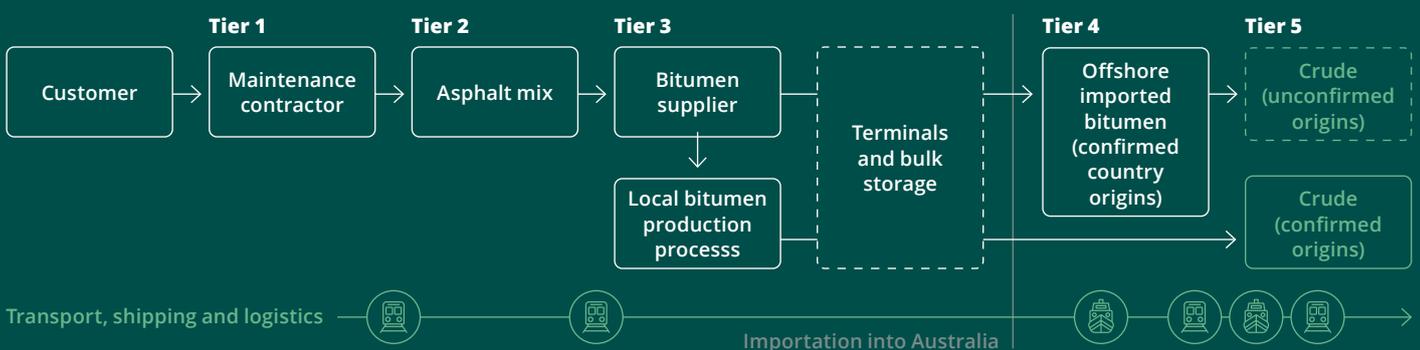
- bitumen had lower exposure to geographic risks when made in Australia (estimated 1.6 people in modern slavery per 1,000 people)
- imported bitumen carried higher geographic risks, with the potential for higher risks if the raw oil was extracted from countries such as Iraq (5.5 people in modern slavery per 1,000 people), Bahrain (6.7 people in modern slavery per 1000 people), Saudi Arabia (21.3 people in modern slavery per 1,000 people)
- geographic risks associated with imported bitumen from South Korea (3.5 people in modern slavery per 1,000 people) and Thailand (5.7 people in modern slavery per 1,000 people) were also considered.

The study found that:

- Through research, engagement and proactive consultation we were able to trace key elements of the supply chain, with the potential to expand this work to gain a robust level of information on the movement of materials, conversion and application of bitumen
- There was some reluctance from some companies to engage on these initiatives, and research and relationships were critical in overcoming these barriers
- The flow of goods can vary depending on location and application, including different supply chain actors. For example, country of origin diverges depending on what is being imported – raw crude or finished bitumen, and this factor can alter the level of inherent modern slavery risks
- Further work is needed to build the capacity of organisations in the supply chain to assess and manage risks to people, such as modern slavery.

Modern Slavery could exist in supporting value chain actors, including in the shipping sector where seafarers could be vulnerable, as well as in other transport, logistics and material handling and storage services.

Figure 7: Bitumen supply chain



# Modern slavery risks

*We recognise our responsibility to take steps to identify the risk of modern slavery within our operations and upstream in our supply chain, as well as potential modern slavery instances which could occur on our roads. We seek to assess relevant risks in alignment with the ‘continuum of involvement framework’, described in the UN Guiding Principles on Business and Human Rights (UNGPs).<sup>1</sup>*

## The UNGPs

The UNGPs establish a framework for businesses to guide their prevention of, and response to involvement in, human rights harm – including modern slavery (an example is shown in the table below).

Using the UNGPs as a guide, we assess modern slavery risks by considering how we may cause, contribute to or be directly linked to potential or actual instances of modern slavery. Our risk identification and assessment processes are applicable across all of Transurban, including the entities Transurban owns or controls.

## Sustainable Procurement Risk Heat Map

Our Sustainable Procurement Risk Heat Map provides a macro view of our procurement risk profile and is reviewed at least annually. The map examines the scope and scale of potential modern slavery impacts (based on prevalence and vulnerability of population) and the irremediable character (severity) of these impacts. The map also shows the proximity of these impacts to Transurban, and whether we may cause, contribute to, or be directly linked to these impacts, and the

likelihood of these impacts occurring. The map was adapted from Transurban’s Risk Management Framework<sup>2</sup> and is informed by ISO 20400 Sustainable Procurement Guidelines and the UNGPs.

Data captured through procurement systems is limited to our activities connected to our Tier 1 suppliers. However, our approach also considers higher-risk activities that may exist deeper within our supply chain (for example, risk associated with raw material extraction) when we attribute risks.

In FY23, our risk heat map was updated to include information from the following sources:

- [2023 Trafficking in Persons Report – United States Department of State](#)
- [List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)
- [Global Slavery Index | Walk Free \(globalslaveryindex.org\)](#)

We also refreshed our heat map against our spend categories; the locations where we operate; and supplier locations. This included a North America-specific assessment of modern slavery risks.

## Risk assessment outputs

### Operations

As was the case in the previous reporting period, we have assessed there is a low risk to people of Transurban causing or contributing to modern slavery in our operations. Our assessment considers factors including:

- Our operations are in countries which are considered to have a low risk of modern slavery
- Our direct employees have formal contractual arrangements and are guided by internal policies, principles and practices
- Our workforce participates in awareness and training programs (deployed across our operations) with content covering knowledge of rights, freedoms and access to grievance channels.

Our potential involvement in modern slavery risks to people in our operations, principally relates to the four employment entities, being the only entities within our corporate structure that employ staff. The majority (~86%) of employees are employed in Australia by Transurban Limited. Our direct workforce includes:

- Visa holders: we have 115 employees on visas in Australia, nine in the United States and one in Canada
- Part-time employees: we have 119 in Australia and one in the United States
- Casual employees: we have 32 employees in Australia.

We have established mechanisms to mitigate against causing modern slavery within our operations, including providing our people with clear employment contracts, and maintaining appropriate internal policies, procedures and practices.

All Transurban employees are free to engage in collective bargaining, can leave their employment without material restrictions and receive mandatory workplace training on ethical business practices, anti-bribery and corruption, harassment, bullying, discrimination, whistleblowing services and grievance channels (see Grievances and remedy on page 21). Employees’ understanding of these matters is assessed within key training modules and completion of required training is included in employees’ performance requirements.

Further, Transurban’s policies and procedures (see page 16) are designed to prevent and mitigate potential modern slavery risks within our operations, and we monitor and measure operational compliance with these.

### Continuum of involvement framework (an example)

	Cause	Contribute	Directly linked
Involvement	Directly engaging in forced labour in its operations.	Acting to influence (via contract negotiations, for example) a supplier using modern slavery practices (such as debt bondage) to supply required work.	Unknowingly engaging a supplier that uses modern slavery practices in providing its goods or services, including via deceptive recruiting.
Expected actions and remedies	<ul style="list-style-type: none"> <li>• cease or prevent the situation</li> <li>• provide or cooperate in legitimate remediation.</li> </ul>	<ul style="list-style-type: none"> <li>• cease or prevent its contribution</li> <li>• use its leverage to mitigate remaining impacts</li> <li>• provide or cooperate in remediation in line with involvement.</li> </ul>	<ul style="list-style-type: none"> <li>• seek to prevent and mitigate the impact</li> <li>• use its leverage to play a role in remediation to the extent possible.</li> </ul>

<sup>1</sup> *Guiding Principles for Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, UN Global Compact*

<sup>2</sup> *Transurban’s Risk Management details can be found on page 82 of the FY23 Corporate Report*

### Vulnerable group identification

We recognise that more vulnerable groups may exist, including contract and contingent-managed workers. As these workers are contracted through professional services labour firms, they are included in our supply chain risk assessment. However, we consider these workers are at low risk of modern slavery due to their skills and expertise, the duties they perform and the locations where these services are provided.

### Supply chain

Transurban's more inherent risks of modern slavery are more likely to occur through our supplier relationships, where our involvement could link us to negative impacts to people. For this reason, our risk management approach prioritises our supply chain relationships and activities.

During FY23, we continued to assess risks and engage with our suppliers directly and

through industry engagement. Given the size and complexity of our overall supply chain, Tier 1 suppliers were our priority to collaborate with to assess and address modern slavery risks in our shared supply chains.

During the reporting period, we continued to deepen our understanding of the inherent modern slavery risks in our supply chain and assess the controls and actions our highest risk and prioritised suppliers take to identify any potential or actual harm.

### Priority risk categories

Our supply chain includes the below priority risk categories:

- Onsite cleaning services
- Construction materials
- Promotional items and Personal Protective Equipment (PPE)
- Security services.

In all identified priority categories, our assessment indicates it is unlikely Transurban would cause or contribute to any potential or actual harm to people. However, we recognise we could be directly linked to harm through our supply chains. We also recognise these could be enabled or exacerbated through any action or inaction from any actor in the supply chain, which could lead to negative impacts on vulnerable people. If these circumstances occurred, any linked involvement could potentially be elevated to 'contributing' to harm.

### FY23 priority risk category assessment

In the previous reporting period, we broadened our risk assessment, identifying security services suppliers as a potential risk category. Security services are now included as a priority risk category. Our refreshed risk assessment and descriptions of our priority risk categories is shown below:

Priority risk	Description of vulnerability, prevalence and the inherent types of modern slavery	FY23 risk responses
Onsite cleaning services	<p>Cleaning services are considered a high-risk category due to the industry's reliance on foreign migrants, visa holders, gig-workers and subcontracted labour. All these groups are vulnerable to modern slavery and human rights abuses such as debt bondage, forced labour and coercive and exploitative situations.</p> <p>The cleaning services industry's historical operational practices are another contributing factor. We have consulted with our contracted suppliers to address these risks. However, we remain vigilant due to the industry's ongoing high-risk status, including its labour sources and established operational practices.</p>	<ul style="list-style-type: none"> <li>• assessed suppliers against our supplier evaluation tool (see page 20)</li> <li>• investigated cleaners' first languages (see page 21)</li> <li>• provided tailored multi-lingual posters displayed in our offices' cleaning cupboards; added an easy-access QR code</li> <li>• increased equitable access to our whistleblower service, including supporting additional, relevant languages (see page 21).</li> </ul>
Construction materials	<p>Materials used in our major projects and in operations and maintenance include raw materials and components that may be assembled in, or originate from countries with increased vulnerabilities of people, and a higher prevalence of modern slavery.</p> <p>Construction materials such as steel, pre-cast concrete, imported materials, electrical equipment, components and wiring may be manufactured at sites engaging in forced labour or deceptive recruiting. The raw materials used in components could be mined by children exploited in dangerous environments.</p> <p>These construction materials are used deeper in our supply chain, at Tier 2 and beyond.</p>	<ul style="list-style-type: none"> <li>• assessed suppliers against our supplier evaluation tool</li> <li>• tracked Tier 2 suppliers through contractual reporting</li> <li>• piloted supply chain mapping of bitumen (see page 12); continuing engagement with industry to assess findings.</li> </ul>
Promotional items and PPE	<p>Research consistently identifies potential and actual instances of forced labour and modern slavery occurring in industries such as textiles, including during the harvesting of raw materials, processing and manufacturing of products. Because of this, we consider promotional items as a high-risk category.</p> <p>These items are mostly imported, and items or raw materials used in the manufacturing process could be produced using state-sanctioned forced labour, or other types of modern slavery deeper within the supply chain.</p>	<ul style="list-style-type: none"> <li>• assessed suppliers against our supplier evaluation tool</li> <li>• developed promotional items and PPE framework, including increased due diligence with sharing of factory audit reports (see page 19).</li> </ul>
Security services	<p>Security services have been prioritised due to this work's 24/7 nature and its use of casual and on-demand and subcontracted workers. The security services industry has historically identified labour issues and employs migrant labour and visa holders.</p> <p>Security services suppliers potentially have severe labour issues and modern slavery instances such as coercion, debt bondage, withholding of documents or threats. These may be more prevalent when security services are subcontracted.</p>	<ul style="list-style-type: none"> <li>• due diligence on security services (noted in our FY22 statement on page 19)</li> <li>• assessed suppliers against our supplier evaluation tool</li> <li>• In FY23, added security services to our high-risk triage within our systems process (see page 18).</li> </ul>

**Downstream and other business relationship risks**

We take the safety of all people seriously, including our customers, communities and people who may be negatively affected by our road's operations or road-construction activities. This includes downstream customers and community members who may be vulnerable to financial issues, potentially including vulnerability to labour exploitation or situations of modern slavery.

During FY23, whilst developing our US specific training for our TCROs, we engaged with international human rights consultants and non-profit organisations. Through this engagement, we learned that debt bondage can occur in the trucking industry, where truck drivers might take out loans (legitimate or illegitimate) to purchase their own trucks which could leave them potentially vulnerable to exploitative financial arrangements from these debts. These learnings were incorporated into our tailored modern slavery identification training to TCROs in the United States.

# Our approach

*Our approach to managing modern slavery risks is largely the same as previous reporting periods. We endeavour to continuously improve our actions and believe we have enhanced certain aspects of our approach. For example, in FY23, we amended certain policies, deployed a supplier evaluation tool, undertook a supply chain mapping initiative and expanded training.*

Our approach includes established governance, due diligence, grievance and remedy procedures and processes. We undertake this approach collaboratively, with our workforce, suppliers and partners and the wider industry to strengthen our industry's understanding of modern slavery risks and the actions we take to address them. Internal training and our capacity building with staff and suppliers helps to support the application of our approach across

our activities.

## Governance

The Transurban Parent Group Board has overall oversight of Transurban, including entities that are owned or controlled. The Board's governance and risk management approach is publicly reported in our [FY23 Corporate Report](#) (see page 74), as well as in our [Corporate Governance Statement](#).

The Transurban Procurement Team implements the Transurban Sustainable Procurement Program. This program determines the actions Transurban will take in assessing and addressing modern slavery risks. The Procurement Team reports to our Chief Financial Officer and provides updates, through functional reporting channels, to the Transurban Board and the Transurban Executive Committee.

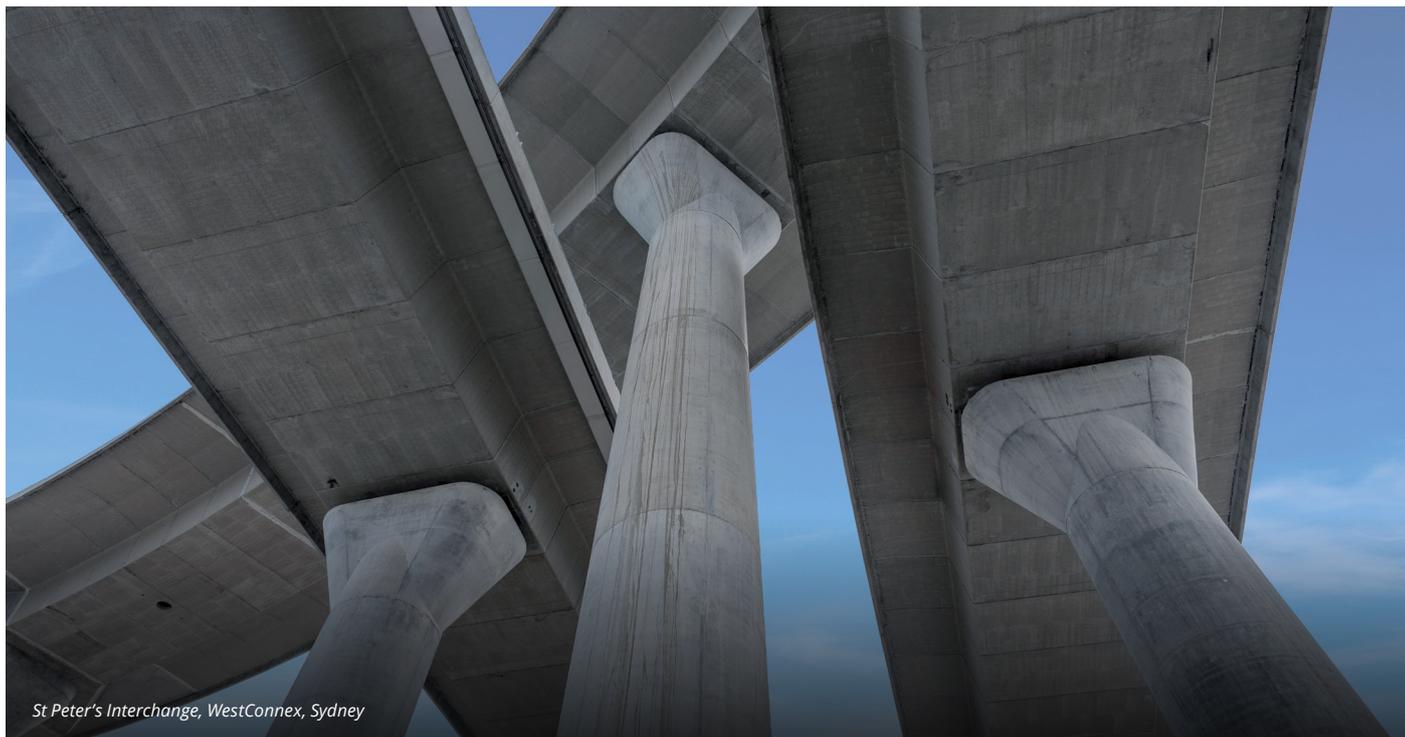
We have regularly engaged with experts to review our actions to-date and support us in continuously improving our approach. Since 2018, we have commissioned expert reviews of our Modern Slavery Statements and our Sustainable Procurement Program and have collaborated with experts to develop and deliver targeted training.

Our Sustainable Procurement Business Leadership Group continues to oversee implementation of agreed actions that assess and address modern slavery risks. This group comprises senior leaders (including function heads and general managers) from across Transurban's operations including: procurement; sustainable procurement; sustainability; social licence; finance and business services; major projects; operations; health, safety and environment; belonging, wellbeing and engagement; compliance and privacy; legal; and customer and technology vendor services.

In FY23, the group met 4 times to receive updates and strategic briefings from our Sustainable Procurement Manager on emerging risks, legislative changes and our progress to combat modern slavery. The group provided input and insights from the business and considered topics including:

**Figure 8: Modern Slavery Governance structure**





St Peter's Interchange, WestConnex, Sydney

- the statutory review of the Act and our engagement with the consultation process
- development of the Canadian Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act
- modern slavery training and awareness raising within our operations
- labour and modern slavery issues in Australia and abroad
- collaboration and engagement with suppliers and industry, including training
- progress and findings from our supplier evaluation tool
- progress and outcomes of the supply chain mapping pilot (see page 12).

Further, our North American operations has its own ESG Taskforce that oversees localised issues, including modern slavery. We continue to take an enterprise approach to our overarching processes, yet look at localised risks and actions appropriate to the countries where we operate.

### Policies and procedures

As noted in previous reporting periods, Transurban has a suite of policies and procedures that set our overall approach to managing modern slavery risks within our operations and supply chain. Our employees, contractors, suppliers and entities are

expected to comply with Transurban's policies and procedures, and this is reflected in employment agreements and contractual controls. Where businesses outside Australia are subject to specific local law requirements requiring them to adopt their own policies, it is expected that the relevant policies are aligned, to the extent possible, with Transurban's approach.

Driving consistent application of our policies and procedures and setting unified expectations and standards across our operations and supply chains is a key element in our approach to managing the risks of modern slavery. Our suite of relevant policies and procedures include:

	Policy or procedure	Scope and description	Implementation
Public	<b><u>Employee Code of Conduct</u></b>	Details employees' responsibilities on topics including bullying and harassment, equity and diversity, risk management, fraud and sustainability.	<ul style="list-style-type: none"> <li>• available on our internal intranet and external corporate website</li> <li>• mandatory annual review for all employees, including their attestation.</li> </ul>
	<b><u>Human Rights Policy</u></b>	Describes how Transurban will fulfill its human rights commitments, including preventing and responding to adverse human rights impacts, including modern slavery and provides guidelines for actions on implementation.	<ul style="list-style-type: none"> <li>• available on our internal intranet and external corporate website</li> <li>• internal contract manager training via the Contract Management Framework process.</li> </ul>
	<b><u>Sustainability Policy</u></b>	Describes Transurban's commitment to People, Planet, Places and Partnerships, including safety of people in our operations and supply chains, and support for the UN SDGs.	<ul style="list-style-type: none"> <li>• available on our internal intranet and external corporate website.</li> </ul>
	<b><u>Supplier Sustainability Code of Practice (SSCoP)</u></b>	Outlines the minimum standards and leadership expectations (including labour and human rights) new and existing suppliers must meet and encourages suppliers to go beyond legal compliance in order to advance their social and environmental responsibility.	<ul style="list-style-type: none"> <li>• available on our internal intranet and external corporate website</li> <li>• included in supplier contracts</li> <li>• internal contract manager training via the Contract Management Framework process</li> <li>• supplier performance tracked via our evaluation tool.</li> </ul>

	Policy or procedure	Scope and description	Implementation
Public	<u>Whistleblower Policy</u>	Explains how Transurban supports reporting of issues including reporting indicators of potential or actual cases of modern slavery.  Provides information to support trust and transparency in the mechanism and process of remediation.	<ul style="list-style-type: none"> <li>• available on our internal intranet and external corporate website</li> <li>• annual awareness and training of the whistleblower policy</li> <li>• internal promotion of the whistleblower service via electronic signage and posters</li> <li>• regular reporting to management and Audit and Risk Committee.</li> </ul>
	<u>Diversity and Inclusion Policy</u>	Details Transurban's commitment to diversity, equity and inclusion at all levels of the organisation, the importance of this to the success of our organisation and the relationship to our values. It outlines our commitment to providing harassment-free and inclusive working environments, flexibility, pay equality and equitable opportunity.	<ul style="list-style-type: none"> <li>• The Board establishes annual, measurable objectives for achieving diversity and inclusion. These are contextual to Transurban's circumstances, strategy and purpose. Progress is reported annually in our <a href="#">Corporate Governance Statement</a>.</li> </ul>
	<u>Anti-Bribery Corruption and Fraud Policy</u>	Outlines Transurban's approach in relation to the prevention, detection, deterrence and management of Bribery, Corruption and Fraud risks as they pertain to the Transurban Group.  Applies to employees, contingent workers, consultants and suppliers of goods or services to Transurban.	<ul style="list-style-type: none"> <li>• available on our internal intranet and external corporate website</li> <li>• gifts and benefits register</li> <li>• mandatory annual training for all employees</li> <li>• accompanying procedure</li> <li>• regular reporting to management and Audit and Risk Committee.</li> </ul>
	<u>Conflicts Management Policy</u>	Defines Transurban's approach to managing conflicts of interest, requiring the declaration of any potential or actual conflicts of interest and appropriate response strategies.  Applies to employees, contractors, consultants or suppliers of goods or services to Transurban.	<ul style="list-style-type: none"> <li>• mandatory annual training for all employees</li> <li>• conflicts of interest register</li> <li>• available on our intranet and external corporate website</li> <li>• accompanying procedure</li> <li>• regular reporting to management and Audit and Risk Committee.</li> </ul>
Internal	<u>Procurement Policy</u>	Commits Transurban to advance alignment with ISO 20400:2017, and to include sustainability considerations in the sourcing process (including human rights) and sets out procurement requirements, including the triage of high-risk categories, risk heat map use, contract and purchase order processes and policy breach measures.	<ul style="list-style-type: none"> <li>• available on our internal intranet</li> <li>• policy is included in Contract Management Framework training</li> <li>• our legal chat bot provides automated guidance.</li> </ul>
	<u>Employee Policy Handbook (US)</u>	Supports US employees in understanding their rights and responsibilities in complying with employee conduct in relation to US operations. It includes US-specific information on harassment, misconduct, anti-bribery and corruption, overtime, employee entitlements and the whistleblower service.	<ul style="list-style-type: none"> <li>• provided to employees upon hiring to review and confirm their understanding by signature and stored in their employment file</li> <li>• available on our internal intranet</li> <li>• reviewed and updated at least annually</li> <li>• key topics covered in our internal Code of Conduct attestations.</li> </ul>
	<u>Employee Policy Handbook (Quebec)</u>	Supports Quebec employees in understanding their rights and responsibilities in complying with employee conduct in relation to our Quebec operations. It includes Quebec-specific information on employee rights as well as accountabilities on harassment, bullying, misconduct, anti-bribery and corruption, overtime, employee entitlements and the whistleblower service.	<ul style="list-style-type: none"> <li>• provided to employees upon hiring to review and confirm their understanding by signature and stored in their employment file</li> <li>• available to access via Quebec SharePoint site</li> <li>• provided in French</li> <li>• reviewed and updated when necessary.</li> </ul>
	<u>Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines</u>	Details how employees can raise issues, including those relating to actual or potential modern slavery in our supply chain. It outlines the triage and assessment process and explains what actions may be taken to provide remediation. More information can be found in the 'Grievances and remedy' section on page 21.	<ul style="list-style-type: none"> <li>• available on our internal intranet</li> <li>• processes align with our Whistleblower Policy</li> <li>• covered in our internal modern slavery training.</li> </ul>
	<u>Contract Management Framework</u>	Provides employees with a standardised approach for managing and administering contracts and is designed to support employees in making responsible and sustainable goods and services purchases. It outlines the roles and accountabilities required over the contract management lifecycle, from initiation to contract close out.	<ul style="list-style-type: none"> <li>• available on our internal intranet</li> <li>• mandatory requirement for strategic and collaborative contracts (high risk / high value)</li> <li>• reviewed annually</li> <li>• regular training sessions provided to contract managers on this framework.</li> </ul>

More information on Transurban's governance can be found in our [Corporate Governance Statement](#), which details some of the above policies and our approach to ethical conduct and responsible decision making.

# Our due diligence

As described in our previous Modern Slavery Statements, one way we assess and respond to modern slavery risks is through our due diligence processes. We track how we and our suppliers meet our policies and contractual requirements, we integrate our findings and we use the overall picture to identify opportunities for improving our actions and processes.

Figure 11 shows how, in general terms, we have integrated due diligence processes into our supply chain management – including the key controls, tools and processes we use throughout the sourcing lifecycle.

Throughout this lifecycle we assess how Transurban may cause, contribute to or be directly linked to, potential or actual instances of modern slavery or adverse human rights impacts using the tools, actions and triage processes that we have available.

This includes reviewing potential spend against high-risk categories and taking actions prior to engaging in business relationships. During the reporting period, three suppliers were triaged through this internal process and were directed to the Sustainable Procurement Manager for investigation and assessment. From this assessment no adverse findings or indicators of modern slavery were identified.

Consistent with previous reporting periods, we continue to learn from our supplier engagements over time and use learnings to improve our processes to better mitigate

and reduce risks to people in our extended supply chains. We have also been asked to complete due diligence processes for our business partners and customers as part of their assessment of their supply chains and connected relationships.

## Due diligence tools

Our due diligence tools are used across the lifecycle of our supplier engagement. Further to the sourcing toolkit descriptions noted in our previous Modern Slavery Statements, the table on page 19 details how we use these tools and how they support our due diligence actions to identify salient risks.

Our tools operate together to monitor risks prior to supplier engagement and to assess further responses to specific risks throughout suppliers' contract lifecycles. We continue to review our risk and due diligence processes across our business and look to use stakeholder feedback to enhance their effectiveness.

<sup>1</sup> [Australian supplier payment code – Business Council of Australia \(bca.com.au\)](https://www.bca.com.au/australian-supplier-payment-code)

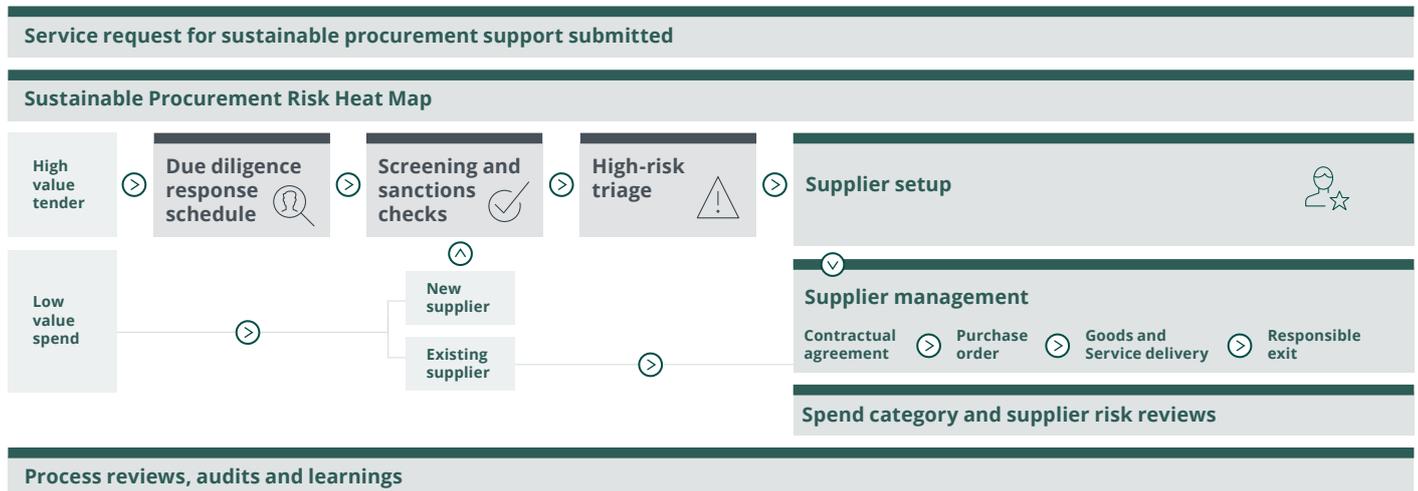
## Supporting small businesses and vulnerable customers

Poor purchasing practices can increase downward pressure on supply chains potentially contributing to an increased likelihood of modern slavery occurring. Transurban is a signatory to the Australian Supplier Payment Code,<sup>1</sup> led by the Business Council of Australia. This is a voluntary code that asks businesses to pay eligible small suppliers on time and within 30 days of receiving a correct invoice. In FY23, we paid \$98M to 636 small businesses in Australia.

We have a number of support mechanisms available to community members experiencing vulnerability to help in reducing their risk of further impacts. These include:

- In Australia, our own Linkt Assist hardship service provides support to our customers experiencing financial hardship which may be a result of social or financial factors including domestic violence, unemployment or disability. This helps to reduce further burdens on people already impacted by vulnerability
- Our Linkt Assist 360 program provides wrap around social support to our customers doing it tough. The support is provided by our community partner Good Shepherd ANZ
- Participating in Thriving Community Partnership's One Stop One Story Hub, a world-first cross-sector digital platform that enables people experiencing domestic and family violence and/or financial hardship to access support from multiple service providers (for example, power, mobile phone and tolls) via one portal (Australia).

Figure 9: Supplier modern slavery due diligence process



This table represents a simplified process map of key modern slavery risk triage points and tools and processes involved to identify and monitor risks of modern slavery in our supply chain

Key triage checkpoints which include modern slavery risks | Ongoing monitoring, tools and actions

Tool	Description	Use-case
<b>Supplier screening</b>	We conduct financial, director and company ultimate benefit ownership checks to identify any known issues such as labour concerns, illegal behaviour or other indicators that may lead to adverse human rights impacts, including insolvency risks.	<ul style="list-style-type: none"> <li>• Procurement operations team reviews new suppliers against sanctions lists</li> <li>• Strategic procurement team conducts additional independent financial and risks checks as needed, prior to contract award.</li> </ul>
<b>Sustainable Procurement Risk Heat Map</b>	Employees use this tool (available on our intranet) to map goods and service purchase categories against inherent modern slavery risk levels.	<ul style="list-style-type: none"> <li>• Employees can seek advice on contract inclusions or measures to take prior to engaging supplier</li> <li>• For high-risk categories, our procurement team assesses supplier spend categories against modern slavery and sustainable procurement risks.</li> </ul>
<b>Tender response schedules</b>	Used for major procurement activities. Schedules enable consistent due diligence and assessment across tender submissions. All proponents must provide evidence demonstrating their ability to meet our codes and policies. Schedule questions include how suppliers mitigate risks to people in operations and extended supply chains.	<ul style="list-style-type: none"> <li>• An evaluation team assesses respondents against agreed criteria based on each scope of engagement</li> <li>• Supplier evaluations assess tender response schedules and provide feedback that informs the awarding of tenders.</li> </ul>
<b>Contractual controls</b>	Establishes binding obligations for suppliers on labour-related and modern slavery clauses. This includes reporting potential or actual cases to us and passing payments to contractors down the supply chain (to reduce labour-related risks beyond Tier 1).	<ul style="list-style-type: none"> <li>• Transurban’s legal team includes a precedent clause working group that regularly reviews clauses. We also draw on external expertise to establish practical and best-practice contractual arrangements.</li> </ul>
<b>Supplier high-risk triage</b>	Determines if new suppliers are providing high-risk goods or services, with high-risk procurement activities triaged to the Sustainable Procurement Manager for investigation.	<ul style="list-style-type: none"> <li>• Investigations may include desktop reviews or seeking further information on supplier controls from employees or suppliers. A supplier may not be onboarded if its controls are insufficient.</li> </ul>
<b>Credit card and purchase order reviews</b>	Purchase orders and credit card spend for higher risk categories identified in our risk heat map are reviewed regularly. Reviews include spend with suppliers who have existing contracts, master services agreements and preferred panels.	<ul style="list-style-type: none"> <li>• Transurban analysts share spend categories and supplier data with the Sustainable Procurement Manager for review. Any learnings inform process improvements in place to manage future transactions with specific suppliers or spend categories and to improve supplier requirements to better mitigate modern slavery risks.</li> </ul>
<b>Supplier evaluation tool</b>	Assesses suppliers’ key controls (policies and processes, including policies and procedures applicable to their supply chains) for managing modern slavery risks. The tool also captures more granular information that will lead to improved future assessments of risks, such as supplier transparency and supplier risk mitigation score assessments.	<ul style="list-style-type: none"> <li>• Transurban’s procurement team uses this evaluation tool as an assessment methodology during tenders</li> <li>• The tool also serves as a guide and reference when we engage with suppliers on process enhancements and additional contractual requirements.</li> </ul>

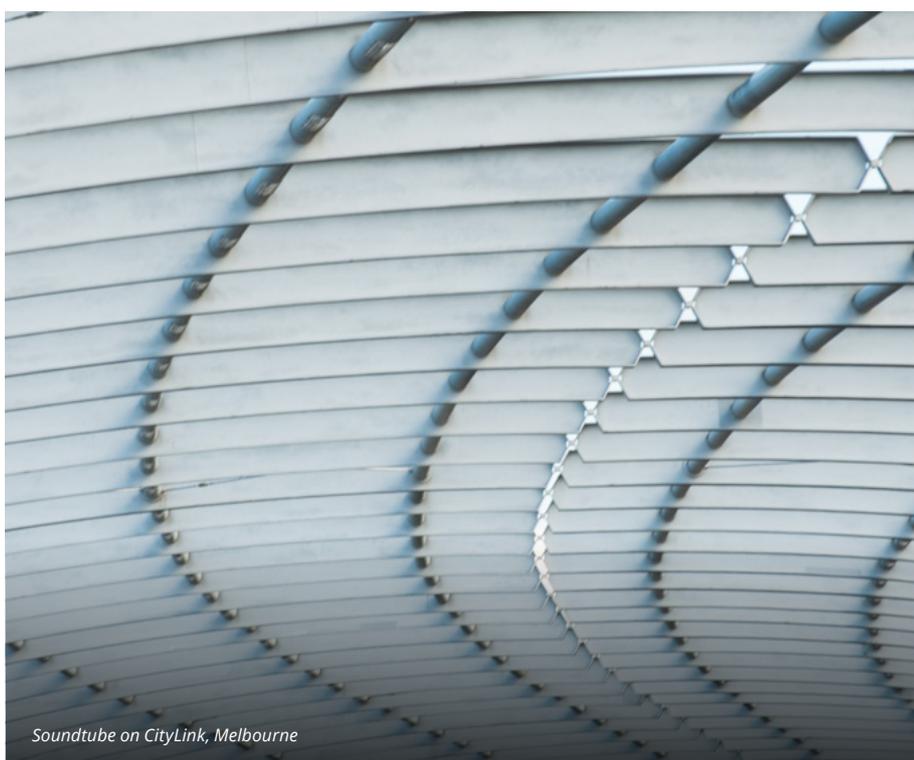
## Sharing Tier 2 supplier audits

For this reporting period we focused our ongoing due diligence efforts on priority-risk categories, including Promotional Items and PPE suppliers. Through discussions with key suppliers we identified an opportunity to gain further knowledge to assess potential labour and modern slavery risks of suppliers further upstream in the supply chain through the sharing of supplier audits.

The aim of this collaborative action is to support our Tier 1 suppliers to understand the labour and modern slavery risks upstream at the Tier 2 supplier level, address any corrective actions that are identified within audits to reduce the potential for modern slavery to occur and to use our leverage to support any further training, actions or remediation that may be required.

Shortly after this reporting period finished, initial SMETA<sup>1</sup> 6.1 audits were shared with us to review.

<sup>1</sup> Sedex Members Ethical Trade Audit which enables organisations to assess their sites and suppliers based on their standards of labour, health and safety, environment and business ethics



Soundtube on CityLink, Melbourne



## Case study: Implementing our due diligence evaluation tool

*Last year, we developed an internal tool to assess suppliers' controls and actions for mitigating risks to people in the supply chain. We have refined this tool further this year, increasing the quantitative data collected, refining qualitative evaluations and improving how we visualise and share data. Our enhanced data set has increased both Tier 1 and upstream supply chain transparency on modern slavery risks.*

### Data captured

Our evaluation tool helps us track and measure the actions suppliers take to address key issues to mitigate modern slavery. The tool captures 65 data points, including: key policies; due diligence actions; and supply chain exposure to labour force and geographical areas. Supplier risk and compliance is measured using:

- **Transparency Score** (quantitative): the number of key issues titles responded to, drawn from 32 data points informed by our core policy expectations, the UNGPs and Act guidance material
- **Risk Management and Health Score** (qualitative): based on the quality of actions taken, measured on a 3 point scale, against an issue title
- **Supplier Sustainability Code of Practice (SSCoP)** alignment: four issues titles assessed against SSCoP minimum criteria and 21 issues titles assessed in total.

These enhancements enable consistent, score-based tender evaluations, provide information for ongoing supplier engagement and allow us to track our suppliers' risk assessment and mitigation performance over time. We have also

used this due diligence evaluation tool to review other business relationships, including potential business acquisitions and customers. We also have the ability to assess overall findings and integrate these into our future efforts on reducing modern slavery risks in our supply chains.

### Minimising suppliers' administrative burdens

Through one-on-one discussions and feedback from industry forums, we understand self-assessment questionnaires (SAQs) can place significant administrative burden on businesses. Our approach reduces this burden by prioritising publicly available information such as Modern Slavery Statements, policies and sustainability reports published on websites or available on public registers.

### Evaluations completed in FY23

We evaluated 70 suppliers, including 48 priority (high-risk category and high-spend) suppliers. This included assessing around 60% of Transurban's addressable spend, and 4,550 issues titles.

- 1,777 issues titles captured (including 342 SSCoP issues)
- 49% met minimum SSCoP requirements

- 69% of suppliers did not appear to have established mechanisms for raising concerns
- 27% identified labour hire in their business and 14% indicated the use of migrant workers
- 34% of suppliers use SAQs and 24% use some form of supplier audits<sup>1</sup>
- Collectively, our suppliers identified more than 235,000 suppliers in their own supply chains<sup>2</sup>

We found that generally the suppliers with lower scores on both transparency and risk management were suppliers of promotional items and PPE which reaffirmed this as a higher risk category. Through using the supplier evaluation tool to assess our priority suppliers, we identified two suppliers that did not appear to have submitted Modern Slavery Statements in line with legislative requirements. We engaged each supplier to understand how they manage modern slavery risks in their operations and supply chains and to raise awareness of their obligations. We learned they were already acting to rectify their positions and we are monitoring their progress.

The process also provided additional information on our suppliers' supply chains, including details on country exposure and raw material input risks, giving us a greater understanding of the potential modern slavery risks further upstream.

<sup>1</sup> Audit types disclosed included SMETA, Ecovadis, Cleaning Accountability Framework and WRAP

<sup>2</sup> The supply chains of our suppliers include goods or services that may not be provided to Transurban or be part of our supply chain

## Grievances and remedy

Access to remedy is a core component of the UNGPs. As indicated in our [human rights policy](#), where we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for, or cooperating in, its remediation through legitimate processes, taking a victim-centered approach. Transurban will seek to use its leverage and where applicable, to exercise to the fullest extent possible any contractual or other legal rights available to it to address any adverse human rights actions or incidents in which we may be involved, including in relation to any issues concerning modern slavery.

We provide both internal and external channels for our employees, contractors and supply chain personnel to raise concerns on issues including potential or actual instances of modern slavery and adverse human rights impacts, as well as fraud, conflicts of interest, bribery and corruption. This includes an independent external whistleblower service that can be contacted via toll-free telephone, online or post. Reports to this service can be made anonymously.

In FY23, we continued to drive awareness of this service, including to TCROs and supplier Incident Response Crews operating WestConnex and Transurban TCROs in the United States. Information on this topic was included in tailored training focused on identifying human trafficking on our roads. We also updated our methods for providing this information to our onsite cleaning contractors. To improve both accessibility and user trust, we produced posters in languages spoken by cleaners working at our sites and displayed these in cleaning cupboards. We added QR codes to the posters that provide quick access to the FairCall service.

Through our independent external whistleblowing hotline service, two issues were raised during the reporting period. These issues were investigated by our Fraud and Corruptions Control Officer under our whistleblowing investigation guidelines. None of these reports related to potential or actual instances of modern slavery.

A less formal channel is also available to our employees: individuals can raise issues internally via the Modern Slavery Query request form on our intranet. These queries are directed to our Sustainable Procurement Manager.

### Remediation guidelines

Our Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines outline the steps we will take if potential or actual instances of modern slavery are identified in our supply chain. We recognise these issues can be complex and sensitive



to navigate, so our guidelines are designed to prioritise the protection and support of identified victims. The guidelines set out ways to investigate any identified instances. If an instance is proven, the guidelines set out key principles and recommended approaches to support victims and support in remediation.

## Training and capacity building

Our awareness raising, training and capacity building is designed to better equip our employees and our supplier partners to understand how modern slavery may occur and flourish in our operations and supply chains, and how to identify and respond to modern slavery risks. Each year, all Transurban employees complete mandatory online training on our policies and our position on these issues. For FY23 our employees were required to complete the following training modules:

- **Ethical Business Practices and Privacy:** our expectations when giving and receiving gifts, benefits or entertainment, fraud, bribery and corruption, conflicts management, and how these topics relate to modern slavery; Privacy and the Whistleblower policy and protections and support available for disclosers.
- **Equal Opportunity and Anti-discrimination:** equal opportunity employment; workplace discrimination and harassment laws including state and federal laws; effects of workplace discrimination and harassment; what to do when faced with these behaviours in the workplace.

- **Sexual Harassment:** workplace sexual harassment; what to do if exposed to any form of sexual harassment in the workplace.
- **Health, Safety and Environment (HSE) Contractor Management:** our "Active Client" contractor management approach; how to implement contractor management assurance; employees' HSE role within our contract management framework.
- **Code of Conduct:** our mandatory behavioural standards and obligations.
- **Whistleblower Policy:** processes for raising concerns (including anonymously) including for situations of potential or actual instances of modern slavery.
- **Modern Slavery:** modern slavery risks; survivor stories; extended supply chain risks; policies; indicators; where to go to raise concerns or for help.

Additional operational training occurs across Transurban, where subject matter experts conduct sessions with targeted team members to deliver learning outcomes on key topics. This includes training on modern slavery and labour related risks as part of contract owner training through Transurban's Contract Management Framework. Contract owners learn about contract requirements relating to modern slavery and how to develop sustainability plans with suppliers, which can include actions to assess and address modern slavery risks.

## Training deployment approach

The training modules outlined on the previous page are deployed annually for mandatory completion by all eligible employees<sup>1</sup> and are supported by internal communications, intranet content (including relevant policy downloads) and public websites. All training modules are accessible as on-demand content as needed.

As part of our integrated approach to risk management, modern slavery was incorporated into an internal panel discussion during HSE month, where Health, Safety and Environment is spotlighted across the Transurban business. The panel discussion titled “How everyone can be a safety leader” supported our people to understand their role in relation to safety including identifying modern slavery risks and how to raise concerns.

The panel was recorded and made available to all employees.

In addition, during FY23 detailed training workshops on modern slavery and key requirements under the Act were also held for all procurement employees and several key contract managers. We also ran key supplier and wider industry workshops, designed to build collective working knowledge of, and capacity to address, modern slavery risks. Collaborating and sharing insights with like-minded industry partners improves overall understanding (see Collaboration and industry engagement on page 24).

We also look to increase the skills and capability of our employees who lead our work on risk management and modern slavery. Two of these team members participated in the UN Global Compact’s Business and Human Rights Accelerator, which was delivered online via on-demand learning sessions, global calls with international human rights organisation Shift, and local peer-to-peer learning sessions with Australian and New Zealand organisations led by the UN Global Compact Network Australia (UN GCNA) and Pillar Two.

This Accelerator was a six-month training program which covered human rights topics including modern slavery and fast tracked learning led by international human rights experts on how to identify, assess, integrate and act on human rights risks.

<sup>1</sup> Direct employees, including managed contractors at the time of deployment, with some exclusions including staff in Canada

## Case study: Collaborating on supplier capacity building

*We understand that, in taking action on modern slavery, we must we must engage and collaborate with our suppliers to share our knowledge and encourage them to take further action in their businesses and supply chains.*

During discussions with a key operations and maintenance contractor in Sydney, New South Wales, we identified an opportunity to increase this team’s skills in identifying and addressing modern slavery. The supplier is a joint venture and did not meet the revenue threshold to report under the Act. We supported by delivering training to relevant personnel of both Transurban and the supplier (including our TCROs, supplier incident response crew members, management and operations staff) Training was delivered as an interactive Toolbox Talk at a maintenance site, with more than 50 people participating. Training content covered:

- modern slavery types and global and national statistics
- the decent work spectrum and where modern slavery exists on this spectrum
- industries where modern slavery can occur, illustrated with examples
- actual modern slavery examples, both in Australia and in NSW

- indicators of potential modern slavery and detecting instances in working on our roads when responding to incidents, dealing with suppliers and working in local communities
- actions to take when raising concerns about actual or potential modern slavery.

The session was recorded and made available to operations and maintenance contractor employees, and to Transurban and WestConnex employees. We will continue educating suppliers, raising industry awareness and increasing capability in identifying potential or actual instances of modern slavery and in knowing how to access and use our provided grievance channels.

We strive to raise awareness across our industry to increase the identification of potential or actual instances of modern slavery, and for our team members and suppliers to be able to know how to respond to suspected cases by raising concerns through trusted and effective channels.



# Measuring effectiveness

*Transurban assesses the effectiveness of our actions to address modern slavery and uses feedback and learnings to refine our program.*

Although the measures for effectiveness remain largely the same as the previous reporting period, we endeavour to evolve and mature our processes to better measure the impact and effectiveness of our efforts. For FY23 we focused on how we assess our suppliers through our evaluation tool, capturing a deeper level of information on modern slavery risks deeper in the supply chain, and how these are managed by our suppliers. We continued to collaborate and raise awareness through training.

As highlighted in previous reporting periods, we strive to continually assess the effectiveness of our actions to mitigate modern slavery risks. We have set out below the controls, actions and indicator framework used. We have also provided quantitative data in Appendix C tracking our progress in assessing and addressing these actions.



Workstream	Controls or action	Effectiveness Indicators
<b>Governance</b>	Policies and guidelines	Regular reviews of policies and guidelines relating to modern slavery
	External benchmarks	Results in public benchmarks, including Dow Jones Sustainability Index and Global Real Estate Sustainability Benchmark for Infrastructure, or public reports on modern slavery disclosures
	Internal audit on controls	Internal auditing of processes and controls relating to assessing and addressing modern slavery and the completion of actions in response to audit findings
	Internal governance groups	Convening of Sustainable Procurement Business Leadership Group meetings. Completion of action items originating from meetings. Qualitative feedback from these leadership meetings on improvements in actions and their effectiveness
	Sustainable Procurement Program KPIs	Meeting annual key performance indicators in relation to continuous improvement in assessing and addressing modern slavery risks in Transurban's operations and supply chains
	Integration of modern slavery considerations into sourcing practices managed directly by the procurement team	Mandatory supplier self-assessment questions including in relation to human rights including modern slavery used in all sourcing activity managed directly by the procurement team
<b>Risk Management</b>	Risk assessment	Annual review of Sustainable Procurement Risk Heat Map, which includes modern slavery risk assessment methodology
	Risk register tracking	Actions taken against corporate risk register items regarding modern slavery
<b>Monitoring</b>	Issues raised through our grievance mechanisms	Accessibility and utilisation of mechanisms Number of issues investigated and remediated
	Annual employee <i>Our Voice</i> survey	Gathers feedback on confidence in leadership, customer focus, sustainability and social license, diversity and inclusion, work environment and more
	Supplier and Business Partners survey	Qualitative feedback to identify areas of focus where Transurban can enhance actions to collaborate with suppliers on mitigating modern slavery risks

# Collaboration and industry engagement

*Transurban continues to contribute to industry progress in tackling modern slavery, including engaging on policy, collaborating on activities<sup>1</sup> and promoting awareness.*

As identified above and consistent with previous reporting periods, one of the ways in which we manage modern slavery risk is through multi-stakeholder collaboration including with non-government organisations (NGOs), civil society, industry-wide engagement and suppliers. As was the case in the previous reporting period, during FY23 we participated in regular forums with suppliers and other industry leaders to share learnings and knowledge on mitigating the risk of modern slavery. In FY23, this included:

- Participating in Australian Government's Modern Slavery Expert Advisory Group, led by the Attorney-General's Department (our Sustainable Procurement Manager was a group member between 2020-2022).
- Participating in the **UN GCNA**, including participating in the network's Modern Slavery Community of Practice – Optimising Stream. Our involvement includes committing to the 10 principles, building our human rights and modern slavery knowledge, engaging with experts, sharing insights and increasing supportive remediation networks.
- Attending the **Australian Government's Modern Slavery Conference**, including presenting on Responsible Sourcing as part of a panel discussion, engaging and learning from multi-stakeholder representatives including from civil society, government and business and listening to the stories of survivors of modern slavery.
- Presenting at the **UN GCNA's 2022 Australian Dialogue on Business and Human Rights** (as a panellist), and learning from human rights experts and peers on current and emerging issues.
- Joining a roundtable with the **UN Special Rapporteur on Contemporary Forms of Slavery**, Prof. Tomoya Obokata to discuss challenges and opportunities in combating slavery within business operations and supply chains.
- Co-Chairing the **Infrastructure Sustainability Council's Modern Slavery Coalition** (see case study right).

We continue to engage with our industry peers to collectively act, share our knowledge where we can help others and learn from peers and experts.

## Engagement with the statutory review of the Modern Slavery Act 2018 (Cth)

During the statutory review of the Modern Slavery Act we wanted to support the review where possible to encourage discussions on the topics that were outlined in the proposed questions from Prof. John McMillan and his review team. We engaged directly in sessions organised by our supplier, Herbert Smith Freehills, and through the UN GCNA.

Some of our suppliers are not currently required to report annually on the risks of modern slavery in their operations and supply chains and actions to address those risks. We recognised that this meant that there were companies in the infrastructure sector that may not have been aware that the Act was under review. The review sought to understand the experiences of non-reporting entities and suppliers to reporting entities and to understand challenges that may arise from any potential lowering of the revenue threshold. We arranged (through our participation in the IS Coalition) a Coalition-member session that enabled some of our suppliers to engage with the review.

## Collaborating for action

The Infrastructure Sustainability Council's Modern Slavery Coalition (of which Transurban is a member) is now in its fourth year. In FY23, the coalition continued to focus on practical opportunities for collaborative action to address shared modern slavery risks in the infrastructure sector, including through:

- **Scenario based training:** designed to build capabilities in responding to a claim of modern slavery in a participant's supply chain, including training on risks, legal responses and communication.
- **Impact note:** aligned modern slavery actions with the Infrastructure Sustainability Council's IS-Rating scheme.
- **Expert presenters:** shared their experience, activity and examples of activity with coalition members. Presenters included James Cockayne (NSW Anti-Slavery Commissioner) and Prof John McMillan (Modern Slavery Act Review).
- **Capability session:** increased supplier awareness, understanding and capability in addressing modern slavery ahead of a potential lower modern slavery reporting requirements threshold.
- **Coalition workshop:** shared insights on challenges and opportunities encountered in developing modern slavery statements and reporting and explored government support and reporting improvement opportunities
- **Modern Slavery Act review submission:** used learnings from capability session, coalition workshop and other engagement to develop a submission for the Modern Slavery Act review.
- **Knowledge Hub:** developed a knowledge hub directory of useful resources for members, with plans to expand access to the wider industry.
- **Supplier risk tool:** developed and published a Supplier Risk Tool tailored to smaller and diverse suppliers
- **Supply chain mapping:** mapped the full supply chain of a key material (bitumen) (see case study on page 12).

<sup>1</sup> All external engagement initiatives are conducted in accordance with applicable laws, including the Competition and Consumer Act 2010 (Cth)

# Approval

## Consultation

Transurban operates using overarching policies, systems and approaches that are designed to be consistently applied across each of the entities comprising Transurban. The entities comprising Transurban have a common Procurement Team. In preparing this Statement, Transurban has communicated with relevant entities (including those owned or controlled) across the Transurban Group to frame expectations, increase awareness, inform our disclosure in this Statement and strengthen our approach to addressing modern slavery risks. This has included seeking input from our ongoing Sustainable Procurement Business Leadership Group for modern slavery risk management, which includes representatives from across a broad range of functions who have responsibilities across the reporting entities covered by this Statement and their owned or controlled entities (including Major Projects, Operations, Sustainability, Social Licence, Finance, People and Culture, HSE, Procurement, Risk and Legal).

During FY23, the Procurement Team also presented to the Boards of Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group on the status of relevant procurement practices and the preparation of this Statement under the Act. This Statement has also been reviewed by the Executive Committee of Transurban, and executive representatives from the Transurban Queensland Group and Airport Motorway Group prior to being put to the relevant group boards for review and final approval.

This joint Modern Slavery Statement was approved by the following Boards of Directors (as the 'higher entity' for the reporting entities within each business group within the meaning of the Act):

- The Board of THL, TIL and TIML as responsible entity for THT for the Transurban Parent Group on 18 October, 2023;
- The Board of Transurban Queensland<sup>1</sup> for the Transurban Queensland Group on 30 October 2023; and
- The Board of Airport Motorway Holdings Pty Limited for the Airport Motorway Group on 23 November, 2023



**Michelle Jablko**

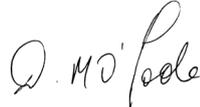
Chief Executive Officer, Transurban Group



**Craig Drummond**

Chair, Transurban Group

As a responsible member of Transurban Parent Group



**Deborah O'Toole**

Chair, Transurban Queensland

As a responsible member of Transurban Queensland Group



**Raymond Golzar**

Chair, Airport Motorway Holdings Pty Limited

As a responsible member of Airport Motorway Group

<sup>1</sup> The "Board of Transurban Queensland" means each of the Boards of Transurban Queensland Holdings 1 Pty Ltd and Transurban Queensland Holdings 2 Pty Ltd. Transurban Queensland Holdings 2 Pty Ltd is not a reporting entity for the purposes of this statement

# Appendix A

## Reporting entities

This Modern Slavery Statement has been prepared as a joint statement on behalf of the following reporting entities:

- Transurban Holdings Limited ACN 098 143 429 ('THL')
- Transurban International Limited ACN 121 746 825 ('TIL')
- CityLink Melbourne Limited ACN 070 810 678
- Interlink Roads Pty Limited ACN 003 845 430
- M5 Holdings Pty Limited ACN 073 922 620
- Sydney Roads Limited ACN 119 323 901
- The Hills Motorway Limited ACN 062 329 828
- Transurban Sun Holdings Pty Limited ACN 169 039 776
- Transurban WGT Co Pty Ltd ACN 617 420 023
- LCT-MRE Holdings Pty Limited ACN 145 311 477
- LCT-MRE Pty Limited ACN 143 401 870,

together with their owned or controlled entities, are referred to as the 'Transurban Parent Group'

- Transurban Queensland Holdings 1 Pty Ltd ACN 169 090 804
  - APL Co Pty Limited ACN 609 262 615
  - APL Hold Co Pty Limited ACN 609 262 624
  - Gateway Motorway Pty Limited ACN 010 127 303
  - Logan Motorways Pty Limited ACN 010 704 300
  - QML Hold Co Pty Limited ACN 165 802 004
  - Queensland Motorways Holding Pty Limited ACN 150 265 197
  - Queensland Motorways Pty Limited ACN 067 242 513,
- together with their owned or controlled entities, are referred to as the 'Transurban Queensland Group'
- Airport Motorway Holdings Pty Limited ACN 078 322 531
  - Airport Motorway Pty Limited ACN 057 283 093,
- together with their owned or controlled entities, are referred to as the 'Airport Motorway Group'

Further details on Transurban roads and projects managed by the reporting entities outlined above are covered in the [FY23 Corporate Report](#), which can be located at [transurban.com](http://transurban.com).

# Appendix B

## Mandatory reporting criteria

## Reference in this statement

Identify the reporting entity	<ul style="list-style-type: none"> <li>• Contents – see page 2</li> <li>• Appendix A – see this page</li> </ul>
Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"> <li>• Our structure and operations – see page 5</li> <li>• Our supply chain – see page 10</li> </ul>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	<ul style="list-style-type: none"> <li>• Modern slavery risks – see page 13</li> </ul>
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	<ul style="list-style-type: none"> <li>• Our approach – see page 15</li> <li>• Collaboration and industry engagement – see page 24</li> <li>• Appendix C – see page 27</li> <li>• Our due diligence – see page 18</li> <li>• Grievance and remedy – see page 21</li> <li>• Case Study – see page 12</li> <li>• Case Study - see page 20</li> </ul>
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	<ul style="list-style-type: none"> <li>• Measuring effectiveness – see page 23</li> <li>• Appendix C – see page 27</li> </ul>
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 joint statement, the entity giving the statement	<ul style="list-style-type: none"> <li>• Consultation – see page 25</li> <li>• Approval – see page 25</li> <li>• Governance – see page 15</li> </ul>
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"> <li>• About Transurban – see page 4</li> <li>• Collaboration and industry engagement – see page 24</li> </ul>

# Appendix C

## Program key tracking metrics

Tracking and Effectiveness Criteria	Area	Indicator description	FY23	FY22	
Are we increasing the visibility of our business and supply chain	Operations	Transurban reporting entities	21	19	
		Transurban operating sites and office locations	22	22	
		Operating countries	Australia, United States of America, Canada	Australia, United States of America, Canada	
		Direct workforce	3900+	3600+	
	Supply chain	Supply chain	Full-time employees	1750+	Not reported
			Supply chain countries	14	18
			Supply chain spend (\$AUD)	over \$1.8b+	Over \$1.3b+
			Tier 1 supplier count (direct)	1600+	1600+
			Tier 2 supplier count	150+ identified	Not reported
			Social enterprises and First Nations suppliers	100+ identified	Not reported
			New/alternate suppliers used in this period compared with previous period	~450	~500
			Major categories of supplier spend	84% of total spend with Major projects Operations and maintenance, Professional services and Technology	82% of total spend with Major projects Operations and maintenance, Professional services and Technology
			Spend with Australian suppliers	90%	84%
			Are we understanding our risks?	Risk Assessment resources	Tools and materials used to inform our risk assessments
US TIP Report	US TIP Report				
US Child and Forced Labour Report	US Child and Forced Labour Report				
Human Rights materials	Human Rights materials				
Supplier Evaluations	Internal expertise				
Internal expertise	Desktop assessments				
Desktop assessments	Modern Slavery Register				
Modern Slavery Register					
Supply chain mapping pilot					
Operations	Operations	Transurban entities with employees			
		Operations risk assessment		Low	Low
		Employees who are visa holders		125	71
		Casual employees		32	25
Supply chain	Supply chain	Transurban entities engaging supply chains		41	Not reported
		Overall spend with suppliers located in countries where we operate		99%	99%
		High-risk spend categories		Cleaning (non-roadside)	Cleaning (non-roadside)
				Promotional items	Promotional items
		Construction materials		Construction materials	
Additional priority risk spend categories	Security services	Not reported			
	PPE				

<b>Tracking and Effectiveness Criteria</b>	<b>Area</b>	<b>Indicator description</b>	<b>FY23</b>	<b>FY22</b>	
<b>Are we improving how we (and our suppliers) address modern slavery risks through ongoing due diligence?</b>	Policies	Operational policies	Human Rights Policy Code of Conduct Sustainability Policy Employee Policy Handbook (US) Whistleblower Policy Anti Bribery, Corruption and Fraud Policy Anti-Money Laundering Policy Diversity & Inclusion Policy Procurement Policy Employee Policy Handbook (Quebec)	Human Rights Policy Code of Conduct Sustainability Policy Employee Policy Handbook (US) Whistleblower Policy Ethical Business Practices Policy Diversity & Inclusion Policy Procurement Policy	
		Supply chain policies (some operational policies also apply to suppliers)	SSCoP Supply Chain Remediation Guidelines	SSCoP Supply Chain Remediation Guidelines	
	Due diligence	Suppliers triaged through high-risk onboarding process	3	3	
		Supplier due diligence evaluations completed (total)	70	44 (third-party digital pilot tool)	
		Priority supplier due diligence evaluations completed	48	Not reported	
		Suppliers identified engaging migrant labour	10	Not reported	
		Suppliers identified using labour hire	19	Not reported	
		Suppliers identified providing workers access to grievance mechanisms	31%	Not reported	
	<b>Are we doing our part to raise awareness of modern slavery by collaborating with suppliers and industry partners?</b>	Mandatory learning – operations	Direct workforce modern slavery eLearning completion	1875	Not reported
		Specialised training	Contract Management staff trained on modern slavery awareness within contracts	70+	Not reported
Tailored TCRO, IRC and supplier training sessions conducted			3	2	
<b>Do potential or actual affected stakeholders have access to, and trust mechanisms to raise concerns and do they have access to remedy?</b>	Grievances and remedy	Total Reportable conduct issues raised (all feedback mechanisms)	2	7	
		Reportable conduct issues relating to Labour rights, working hours, wages	0	0	
		Remediation provided	Not applicable	Not applicable	

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