

Ethical Business Practices Policy

Summary 2019

Transurban is a toll road owner and operator with a vision to build stronger communities through transport.

We provide confidence to all our stakeholders and communities in our operations through the consistent application of sound financial disciplines and strong governance and risk management practices.

The Ethical Business Practices Policy applies to directors and employees of Transurban, our contractors and their employees.

Transurban is committed to a sound culture of corporate compliance and ethical behaviour, and has **zero tolerance** for wilful breaches of its Code of Conduct (including fraud and corruption). Transurban Personnel are expected to conduct themselves in a manner consistent with the Code of Conduct.

Transurban is committed to the following:

- not paying bribes to any individual, government official, organisation or entity
- not paying bribes indirectly through brokers, agents, consultants or other associated persons or third parties
- avoiding the appearance of paying bribes through other means such as improper meals and entertaining, excessive gift giving or making facilitation payments
- maintaining detailed and accurate books and records and internal controls and ensuring bribes or other improper payments are not concealed by “off-book” arrangements or by falsifying books and records

- performing regular fraud, bribery, corruption and modern slavery risk assessments
- maintaining a log of reportable gifts and benefits received
- logging of potential and actual conflicts of interest
- ensuring reports of suspected fraud, bribery or corrupt conduct are reported and investigated thoroughly, impartially and in a timely manner; and
- providing fraud, bribery, corruption and modern slavery awareness training as required for all Personnel.

As set out in Transurban’s Whistleblower Policy, Transurban strongly encourages Personnel to report any information that may relate to a breach of the Ethical Business Practices Policy immediately where there is actual or suspected bribery, fraud or corruption. It is acknowledged that breaches of this nature may result in serious criminal and/or civil penalties as well as damage to Transurban’s reputation.

As part of maintaining the Code of Conduct (How We Work @ TU/TQ) and the corporate governance and integrity framework, Transurban promotes staff awareness of, and compliance with this Policy through regular communication and training (both upon joining Transurban and annually thereafter).

The Ethical Business Practices policy will be reviewed on an annual basis to ensure it continues to be appropriate and operates effectively.