

# Ethical Business Practices Policy

Summary 2021

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 instilling and embedding a culture of acting lawfully, ethically and responsibly, and has **zero tolerance** for wilful breaches of its Code of Conduct (including privacy, ethical business practices, 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 either directly or indirectly to any individual, government official, organisation, broker, agent consultant or other associated persons or third parties
- Avoiding the appearance of paying bribes through other means such as meals and entertainment, excessive gift giving or making facilitation payments
- Maintaining detailed and accurate books and records and effective internal controls
- Ensuring regular fraud, bribery, corruption and modern slavery risk assessments are incorporated into every-day business practices
- Ensuring our dealings with third parties comply with the Competition and Consumer Act 2020 (Cth)
- Maintaining a register of reportable gifts and benefits
- Maintaining a register of potential and actual conflicts of interest
- Ensuring any report of suspected fraud, bribery or corrupt conduct are reported and investigated in accordance with the relevant policy(ies); and
- Providing fraud, bribery, corruption and modern slavery awareness training to all Personnel.

As set out in Transurban's Whistleblower Policy, Transurban strongly encourages personnel to immediately report any information that may relate to a breach of the Ethical Business Practices Policy 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.

The Ethical Business Practices Policy supports Transurban's corporate governance and integrity framework by:

- Promoting and encouraging ethical practices within our business and with our third-party suppliers
- Providing guidance on the prevention, detection and response to suspected fraud, conflicts of interest, bribery, corruption or breaches of the Modern Slavery Act
- Providing guidance on managing gifts and benefits
- Ensuring appropriate internal controls are in place for accountability and safeguarding for the business; and
- Demonstrating our commitment to accuracy in reporting and recording of transactions.

As part of maintaining the Code of Conduct and the corporate governance and integrity framework, Transurban promotes employee awareness of, and compliance with this Policy through regular communication and training (both upon joining Transurban and annually thereafter).

Failure to comply with this policy may result in disciplinary action in accordance with the Code of Conduct.

This policy will be reviewed on an annual basis to ensure it continues to be appropriate and operates effectively.