

# Human Rights Policy

Transurban recognises its role in respecting and advancing human rights. As one of the world's largest toll-road operators, we are well placed to enhance the recognition and promotion of human rights through our operations and supply chains. However, we acknowledge that our actions and those of our suppliers can positively and negatively affect human rights.

The commitments and expectations we set out in this Human Rights Policy ("Policy") are fundamental to us achieving our purpose to "Be the link between people, places and progress".

## 1 Scope

This Policy sets out how we will fulfill our human rights commitments and engage our stakeholders in preventing and addressing any involvement in adverse human rights impacts.

This Policy applies to all non-executive directors, officers, and employees of Transurban and any contingent worker engaged directly by Transurban or by a third-party service provider.

In this Policy any reference to 'Transurban', 'We', 'Us' or 'Our' is a reference to the Transurban Group. We expect our suppliers to commit to respecting human rights as set out in this Policy and our Supplier Sustainability Code of Practice. We seek to work with other third parties who respect human rights.

## 2 Human rights principles and guidance

Transurban is committed to respecting and supporting all internationally recognised human rights, understood at a minimum to be:

- Universal Declaration of Human Rights; and
- International Covenant on Civil and Political Rights; and
- International Covenant on Economic, Social and Cultural Rights;

together commonly known as the International Bill of Rights; and

- International Labour Organization's Declaration on the Fundamental Principles and Rights at Work.

We are committed to operating in a responsible manner in accordance with the expectations set out in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

We are also participants in the UN Global Compact and are committed to taking action on the UN Sustainable Development Goals most relevant to Transurban.

## 3 Salient human rights issues and expectations

Transurban's salient human rights issues and our responses are summarised in the following table:

Human rights issue	Our response
Bullying, harassment and abusive behaviour	We expect our Workforce to be treated with dignity and respect. We do not tolerate bullying, harassment or abusive behaviour in any form.
Development activities and land acquisition	<p>We will work with government partners and other external stakeholders to seek to minimise property acquisition and, if required, it will be undertaken in a fair and just manner and preferably with the consent of the owner.</p> <p>Projects that we initiate will be designed and developed in ways that seek to avoid or minimise adverse impacts on communities. We will strive to achieve the same outcomes for projects where we partner with governments and/or other external stakeholders.</p>
Discrimination	We prohibit and actively work against discrimination of any kind (including on the basis of gender, race (including traits historically associated with race), ethnicity, colour, marital or family status, sexual orientation, gender identity, age, disabilities, religious beliefs, cultural background, socioeconomic background, perspective and experience, veteran or military status, or any other category protected under applicable law) across our organisation.

Human rights issue	Our response
Diversity and inclusion	<p>Transurban recognises that diversity and inclusion is both fundamental to the success of our business and also a legislative requirement in some jurisdictions.</p> <p>We strive to provide an inclusive environment for all and to have a diverse workforce that reflects our customer base and the communities of the countries where we operate.</p>
Equal remuneration	<p>We will annually and continuously review remuneration across the Transurban Group to achieve equal remuneration for equal or comparable work.</p>
Families	<p>We will maintain workplace structures, systems, policies and procedures that help employees balance their work, family and other responsibilities.</p> <p>We also commit to providing a supportive environment for, and prioritising, the safety of any employee or other worker affected by family and domestic violence or instances of forced marriage.</p>
Health and safety	<p>We will provide a healthy and safe operating environment for the Transurban Workforce and/or visitors (including third party contractors) to our workplaces. This includes supporting both physical and mental wellbeing, including monitoring and managing psychosocial risks.</p> <p>We also commit to working towards improving road safety including eliminating fatalities and injuries associated with the use of our roads.</p>
Indigenous peoples and reconciliation	<p>We will continue to foster a culture of inclusion, respect and proud celebration of Aboriginal and Torres Strait Islander cultures, while respecting the land on which we operate, any areas of traditional cultural significance and the voices of our community neighbours.</p> <p>To assist in achieving this commitment, we will maintain and implement a Reconciliation Action Plan in Australia to bring this commitment to life – directly in our business and in partnership with our suppliers and other stakeholders.</p>
Modern slavery <sup>1</sup> , forced, bonded and child labour <sup>2</sup>	<p>We will work across our extended supply chains to assess and address modern slavery risks, including prohibiting the use of forced labour, bonded labour or child labour within the organisation or by our suppliers. We will also publish modern slavery statements annually.</p>
Privacy	<p>We will seek to robustly protect our employee and customer Personal Information, and any other related information.</p>
Vulnerable customers	<p>We are committed to assisting customers who are experiencing financial or social challenges which may include physical or mental illness, disability, unemployment, drug or alcohol dependence, family breakdown or family violence.</p>
Working conditions and freedom of association	<p>We will strive to provide working conditions that support our employees' needs for a healthy work-life balance and are committed to providing flexible working options.</p> <p>We also respect the right of the Workforce to form and join employee organisations including trade unions and other employee representation bodies, and to bargain collectively.</p> <p>We are committed to making full payment of wages and other entitlements in a timely manner. We will also monitor workloads and productivity and manage any concerns accordingly.</p>

<sup>1</sup> As defined in the Modern Slavery Act 2018 (Cth) which includes human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, the worst forms of child labour.

<sup>2</sup> As defined by the ILO, which defines it as work that deprives children of their childhood, potential, dignity and is harmful to their development.

## 4 Implementation

The commitments set out in this Policy will be implemented across the Transurban Group by:

- communicating this Policy internally through regular training for relevant members of the Workforce and externally (via the Transurban website and to external stakeholders as relevant);
- developing and implementing relevant Transurban procedures;
- undertaking an ongoing process of human rights due diligence to identify, prevent, account for, mitigate and remedy our human rights impacts in our operations and supply chains and through other business relationships;
- making our suppliers aware of our expectations in relation to human rights through this Policy and our [Supplier Sustainability Code of Practice](#) and, where appropriate, working with them to help improve their understanding and capacity to address and remedy relevant human rights issues;
- monitoring the effectiveness of our actions to assess and address human rights impacts;
- maintaining avenues for rights-holders to raise concerns and provide feedback to us through our project-level channels, community engagement surveys and maintaining an anonymous, independent and accessible whistleblower service that can be used by all stakeholders including employees, suppliers, supply chain workers, members of the public, to raise relevant human rights concerns in line with the relevant law and the Whistleblower Policy (which can be found on the Transurban website); and
- collaborating with judicial or non-judicial grievance mechanisms in providing access to remedies.

We encourage anyone who is aware of, has witnessed, has been impacted by, or suspects any Reportable Conduct<sup>3</sup> to promptly raise a concern to our independent, multilingual and confidential [Whistleblower service](#). All reports to this service will be investigated and treated seriously and will be kept confidential and secure as far as possible.

Internal guidance on remediation procedures is available via our [Whistleblowing Policy](#) and our Supply Chain Modern Slavery Remediation Guideline.

Procedures for addressing any instances of human rights violations will vary according to the nature of the issue.

Disciplinary procedures may also apply for instances of non-compliance by members of the Transurban Workforce in relation to this 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 centred approach. Transurban will seek to use its leverage and where applicable, to exercise to the fullest extent 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.

In addition to the above, we will also endeavour to:

- review and enhance our procedures, training, or base-line contractual requirements as appropriate;
- consult with affected stakeholders;
- consider seeking independent expert advice to provide responses that are appropriate and effective; and
- share lessons learnt to prevent reoccurrence of adverse human rights impacts within the organisation, our supply chain and the broader industry.

## 5 Supporting policies and procedures

This Policy is complemented and supported by a number of existing Transurban policies and procedures including: the Code of Conduct, Anti-Bribery, Corruption and Fraud Policy and Procedure, Conflicts Management Policy and Procedure, Diversity and Inclusion Policy, Employee Handbooks (USA and Canada), Equity in the Workplace Policy, Equity in the Workplace and Complaints Procedure, Health, Safety and Environment Policy, Privacy Policy, Sustainability Policy, Supplier Sustainability Code of Practice and Whistleblower Policy.

## 6 Governance

Transurban's Board, which has ultimate responsibility for our human rights approach, has approved this Policy. The Policy will be regularly reviewed and continuously improved in response to feedback from internal and external stakeholders. Material amendments to this Policy are subject to Board approval.



**Michelle Jablko**  
Chief Executive Officer

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<sup>3</sup> For further information in respect to what constitutes "Reportable Conduct", we refer suppliers to Transurban's Whistleblower Policy.