

# 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 in the markets where we operate. We acknowledge there are opportunities and risks that can positively or negatively affect human rights.

The commitments and expectations we set out in this Policy are fundamental to us achieving our purpose *“To strengthen communities through transport”* and our desire to be a market leader in environmental, social and governance performance.

## 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.

The Policy applies to all Transurban Personnel<sup>1</sup> and our wholly owned subsidiaries. We expect our suppliers to respect human rights as set out in our Supplier Sustainability Code of Practice and seek to work with other third parties who respect human rights.

## 2 Human rights principles and guidance

In implementing this Policy, we are committed to respecting and supporting internationally recognised human rights, in line with the UN Guiding Principles on Business and Human Rights, as set out in the:

- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights; and
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We are also guided by the following additional initiatives and frameworks:

- UN Global Compact;
- UN Sustainable Development Goals; and
- OECD Guidelines for Multinational Enterprises.

## 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	Everyone who works for or with us is to be treated with dignity and respect. We do not tolerate bullying, harassment or abusive behaviour in any form.
Development activities and land acquisition	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.  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.
Discrimination	We prohibit and actively work against discrimination of any kind (including on the basis of gender, race, ethnicity, physical ability or sexual preference) across our organisation.
Diversity and inclusion	We will provide an inclusive workplace for all and strive to have a diverse workforce that reflects our customer base and the communities of the countries where we operate.

1. Transurban Personnel means all Transurban Group Australian and North American employees, contractors, directors and officers.

Human rights issue	Our response
Equal remuneration	We will annually review remuneration across the Transurban Group and continuously strive to achieve equal remuneration for equal work regardless of status (gender, race, ethnicity or otherwise).
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 Transurban Personnel and/or visitors (including third party contractors) to our workplaces. This includes supporting both physical and mental wellbeing.</p> <p>We also commit to working towards road safety including eliminating fatalities and injuries associated with the use of our roads.</p>
Indigenous peoples and reconciliation	<p>We will create a culture of inclusion, respect and proud celebration of Aboriginal and Torres Strait Islander cultures with our employees and business partners, 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	We will work across our extended supply chain to assess and address modern slavery risks, including prohibiting the use of child or forced labour within the organisation or by our suppliers. We will also publish modern slavery statements annually.
Privacy	We will seek to robustly protect our employee and customer personally identifiable information, and any other related information.
Vulnerable customers	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.
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 arrangements.</p> <p>We also respect the right of Transurban Personnel to form and join employee organisations including trade unions and other employee representation bodies, and to bargain collectively, in accordance with local laws.</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>

## 4 Implementation

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

- communicating this Policy internally 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, mitigate and account for our human rights impacts;
- making our suppliers aware of our expectations in relation to human rights and applying our Supplier Sustainability Code of Practice and, if appropriate, working with them to help improve their understanding and capacity to address relevant human rights issues;
- conducting due diligence on our operations and supply chain and other business relationships in order to assess human rights impacts;
- providing regular internal training for relevant Transurban Personnel;
- monitoring the effectiveness of our actions to assess and address human rights impacts including through internal (and in the future, external) audits of relevant supporting policies and procedures; and
- maintaining an anonymous, independent and accessible whistleblower service that can be used by all stakeholders including employees, suppliers, supply chain workers and members of the public to raise relevant human rights concerns.

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 Transurban Personnel 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. Transurban will seek, 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 ensure responses 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.

Internal guidance on remediation is available via our Supply Chain Modern Slavery Remediation Guideline.

## 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, Ethical Business Practices Policy, Employee Handbooks (USA and Canada), Diversity and Inclusion Policy, Equity in the Workplace Policy, Equity in the Workplace and Complaints Procedure, Privacy Policy, Whistleblower Policy, Health, Safety and Environment Policy, Sustainability Policy and Supplier Sustainability Code of Practice.

## 6 Governance

Transurban's Board, which has ultimate responsibility for our human rights approach, has approved this Policy. The Policy will be reviewed annually and continuously improved in response to feedback from key stakeholders and the evolution of our procedures and findings from our processes or audits.



**Scott Charlton**  
Chief Executive Officer

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