

NorthWestern Roads Group Modern Slavery Statement 2024

/01 About this Statement

This Modern Slavery Statement (Statement) is made on behalf of NorthWestern Roads Group Pty Ltd (the ultimate holding company of the NorthWestern Roads Group) and the following NorthWestern Road Group reporting entities (together referred to as we, our, NorthWestern Roads Group or NWRG).

- NorthWestern Roads Group Pty Ltd (ACN 169 328 330);
- NorthConnex Company Pty Ltd (ACN 602 719 513);
- NorthWestern Roads Group Nominees Pty Ltd as trustee for the NorthWestern Roads Group Trust (ACN 169 328 287); and
- Westlink Motorway Group (ACN 102 757 924).

This Statement covers the reporting period 1 July 2023 to 30 June 2024 (Reporting Period or FY24) and has been prepared to meet the mandatory criteria of the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act). This Statement is informed by the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (2023).

Consultation and Engagement

In preparing this Statement, the Safety, Environment and Stakeholder Manager for NorthWestern Roads Management Services Company, actively engaged and consulted with the relevant business units and entities within NorthWestern Roads Management Services Company, which provides management services to the broader NorthWestern Roads Group. This was undertaken by (i) collaborating with the relevant business units, shareholder subject matter experts, entities and boards of each reporting entity to provide an overview of the reporting requirements of the Modern Slavery Act, (ii) providing information regarding the actions we intend to take to address these requirements including relevant updates, and (iii) seeking feedback from relevant business units, entities and the boards with respect to modern slavery matters. The boards of the reporting entities have common directors. This Statement is the consolidation of the outputs from those efforts.

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In the spirit of reconciliation NWRG acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today. We operate and base our activity on Darug Country.

NWRG upholds high standards of conduct, and we are continuously seeking to improve our due diligence practices. We strongly encourage anyone to alert us of concerns about modern slavery, potential human rights issues or unethical behaviours in our operations or supply chain through our whistleblower hotline. Your input is valued, and we take reports of improper conduct seriously. Lodge your report anonymously with our third-party provider using [this link](#).

Our FY24 Key Achievements



Risk Assessment

Conducted a modern slavery risk assessment to thoroughly identify and manage our risks.



Capability and Awareness

Delivered role specific modern slavery training to 92% of NWR employees on modern slavery risks and how we address and manage them.



Grievance and Remediation

Updated the NWR Supply Chain Modern Slavery Remediation Guideline and shared updated grievance mechanisms with suppliers.



Due Diligence

Worked with our design and construction contractor to understand the modern slavery screening they performed for high-risk steel supplied for a major project funded by NWRG. Developed a ‘audit for non-auditors’ checklist for NWRG employees to note modern slavery concerns during supplier visits.



Governance

Updated our Whistleblower Policy with explicit mention of modern slavery as reportable conduct.

Chair’s Foreword

NWRG is committed to fostering a culture that respects internationally recognised human rights.

NorthWestern Roads Group (NWRG) is responsible for operating and maintaining almost 50km of road and 40km of shared path across the Westlink M7 Motorway and NorthConnex Tunnel, enabling over 85 million trips a year, supporting key freight corridors. As stewards of these national assets and connections between employment, industrial and residential growth areas, we’re committed to managing them responsibly, ethically and sustainably. In addition to our community, this commitment also considers our impact on people and places, particularly our awareness of and respect for human rights.

Modern slavery is a violation of human rights involving the exploitation of people through coercion, threats or extortion. It exists in all sectors and countries, including our own, with the 2023 Global Slavery Index reporting that 41,000 Australians live in modern slavery every day.

In addition to being a disregard for human rights, modern slavery is a crime. It’s also a system failure, where businesses aren’t held accountable for addressing vulnerability in their supply chains or operations. As an organisation, NWRG is committed to fostering a culture that respects internationally recognised human rights taking steps to assess and address the risks of modern slavery in our supply chain and operations. We place great importance on the United Nations Guiding Principles on Business and Human

Rights, aligning our procurement practices with the International Guidelines for Sustainable Procurement (ISO20400). To effectively address modern slavery, NWRG requires an ongoing awareness of not only our operational impact but the impact of our suppliers and partners, too. We place significant weight on maintaining strong, collaborative relationships with actors in our supply chain and proactively understanding how they fulfil their obligations. As providers of vital services, materials and utilities, we all operate on a mutual understanding and ongoing dialogue on the gravity of modern slavery.

This year, NWRG conducted our third modern slavery risk assessment to thoroughly identify, assess and manage modern slavery risks in our business operations and supply chain. The assessment also allowed us to define and prioritise our most salient risks within our risk management framework to establish our due diligence process. Through this year’s Modern Slavery Statement, we proudly share our progress for this reporting period and our future commitments to improve in areas that will be most impactful.

Penny Graham
Chair of NorthWestern Roads Group



/02 About NWRG

NorthWestern Roads Group operates and maintains **one of Australia’s busiest road systems**, encompassing the Westlink M7 Motorway and NorthConnex Tunnel. Managing almost 50km of road and 40km of shared path that allows for more than 85 million trips a year is **a responsibility we take seriously**.

2.1 Our Vision and Values

NWRG strives to operate with a positive social, environmental and economic impact, including addressing and mitigating the risk of modern slavery in our organisation. With dependable yet complex supply chains and business operations, we’re aiming to improve how we address potential areas where modern slavery risks exist, including procurement, employment, maintenance and manufacturing.

NWRG takes a serious approach to addressing these human rights violations, with our broader company values guiding every action. Through ongoing collaboration with our partners and the improvement of internal policies and processes, we’re on a journey to improve how we identify and address modern slavery in our operations and supply chain.

As stewards of significant assets that require a range of services and support to operate and maintain, we understand the potential impact that our entire supply chain and business operations have. Most importantly, we know that every purchasing and partnership decision must consider these impacts, too.

Our vision is linking Sydney and beyond to thrive, and our values guide everything we do.

Collaboration

Together we can go further, faster and safer.

Integrity

We take our responsibility seriously and do the right thing.

Authenticity

We are open about our challenges with a focus on solutions. We think, act and talk with transparency.

Focus

We exist to help Sydney and beyond thrive, so this is the mindset we will bring to everything we do.

2.2 About NWRG

NWRG, with its registered office located in Eastern Creek NSW, is responsible for the management and operation of two significant infrastructure assets in New South Wales, Australia: the Westlink M7 motorway in western Sydney and the NorthConnex Tunnel in the northwest of Sydney. For detailed information about each motorway, please visit www.WestlinkM7.com.au and www.Northconnex.com.au.

NWRG is owned by QIC Private Capital Pty Limited, acting on behalf of funds and clients managed by QIC Limited, the Canada Pension Plan Investment Board (trading as CPP Investments), and Transurban Limited (ABN 96 098 143 410).



2.3 Operations

NWRG operates and maintains key road infrastructure, managing traffic systems and related services to ensure efficient transport and connectivity across major road networks. We rely on many skilled professionals and managerial staff to support these operations, and our direct and subcontracted labour hire is based in Australia. These team members play a crucial role in overseeing various aspects of our operations, including contract administration, financial management, risk management, environmental management, technology and safety.

Although NWRG does not directly employ its workforce, it does operate through a Management Services Agreement with NorthWestern Roads Management Services Company, wholly owned by NWRG (referred to as 'NWR').

A small but dedicated group of less than 30 permanent employees of NWR is responsible for managing contractors who execute essential operations and maintenance services for the Westlink Motorway and NorthConnex Tunnel under this agreement, including:

- **Operations and Traffic Management;**
- **Maintenance Activities (Mechanical, Electrical, Civil and Building, Intelligent Transportation System (ITS), Landscaping);**
- **Incident Management and Response.**

During FY24, NWR hired five professionals on consultancy agreements for various roles within the organisation.

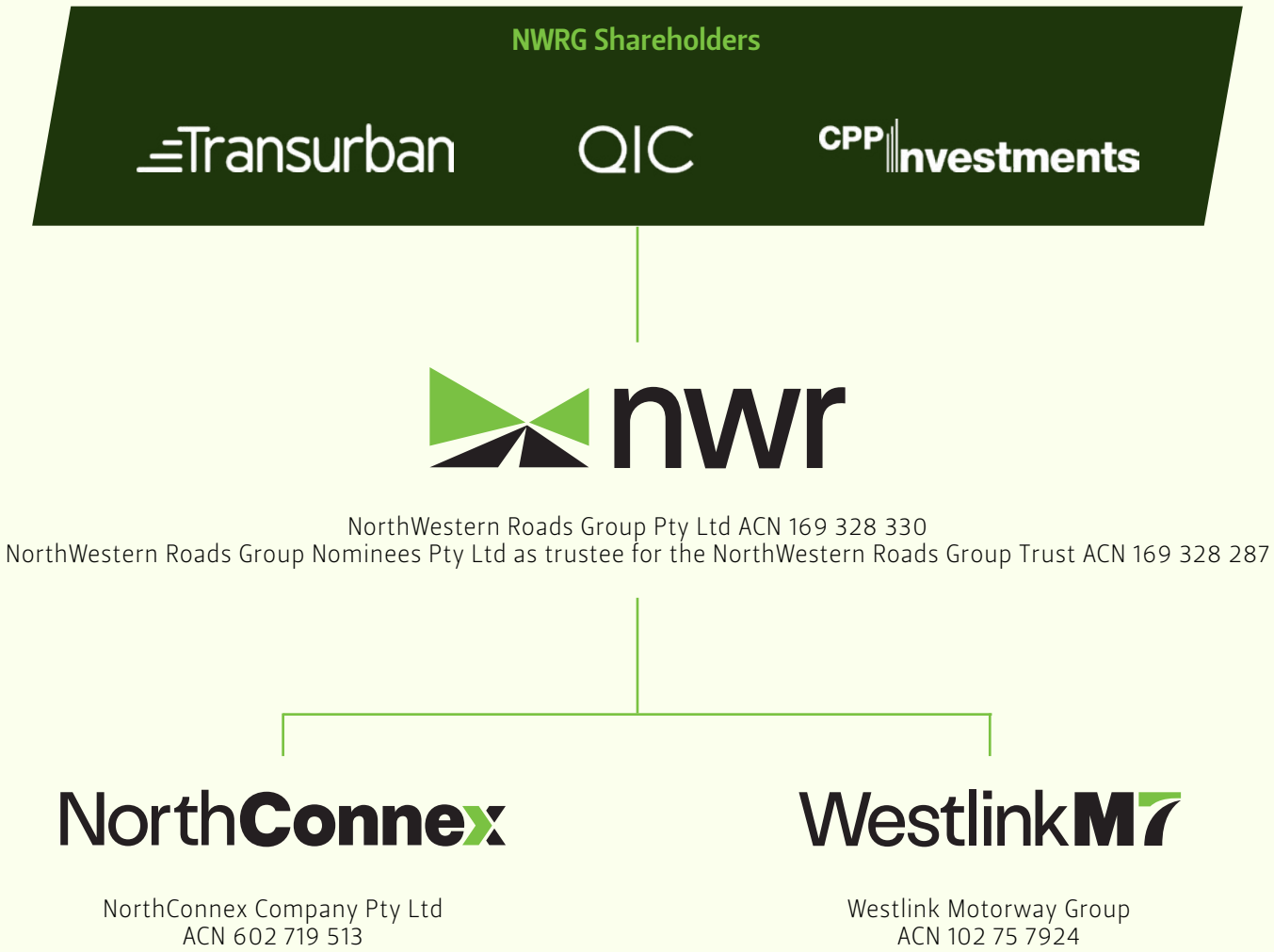


Figure 1. NWRG Group Structure



2.4 Supply Chain

NWRG operates with a complex yet dependable supply chain and a commitment to maintaining strong and collaborative relationships with our suppliers.

We source 100% of our goods from Australian-based suppliers and, aside from a call centre in Manila, Philippines, used by a supplier to support our customers, we source our services within Australia. However, there are still varying degrees of modern slavery risks in our procurement of services and materials. As 95.5% of our spend is with a select group of 19 Australian-based suppliers, we can build even closer and more resilient partnerships with each one to better understand how they fulfil obligations and address modern slavery risks within their operations.

During this Reporting Period, we've maintained the majority of relationships from our two previous Modern Slavery Statements, further strengthening this collaboration and alignment on values. As most of our Tier 1 partners are established ASX-listed companies, they understand the importance of maintaining an ongoing dialogue about modern slavery risks and concerns and addressing them as they arise.

Case Study #1
Conducting A Modern Slavery Risk Assessment

In FY24, NWRG commissioned Edge Impact to conduct a modern slavery risk assessment, assisting us in better identifying and managing our risks.

As modern slavery practices such as forced labour and exploitation often hide in complex supply chains like those we operate in, it was critical to understand our impact. Based on life cycle methodology, the assessment reviewed our spend across 71 categories in FY23, incorporating 446 of 447 suppliers in our supply chain.

The assessment screened our spend through internationally recognised data sources, including Exiobase, the Social Hotspot Database and Global Slavery Index, as well as a comprehensive media and literature database review. The assessment established that the majority of NWRG’s supply chain spend contained very-high and high risks related to construction services, including within product, material and labour supply chains.

The review also found that our spend categories involving direct or subcontracted labour hire had an increased risk. As the construction industry’s supply chains are fragmented and complex, it’s particularly susceptible to modern slavery practices and of particular importance to NWRG.

The assessment allowed us to better understand and mitigate risks associated with modern slavery. Internally, we used the modern slavery risk assessment to inform our risk management framework and provide guidance on due diligence actions. You can find the detailed results of this assessment in Section 4.

Supply Chain Overview
by Spend

Supply Chain Category	Percentage of Overall Expenditure
Operations and maintenance services	39%
M7 and M12 integration project	38%
Professional services	7%
Legal services	2%
Technology services	2%
Other miscellaneous services and materials	12%

Table 1. Supply Chain Overview by Category of Spend

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Our Approach to Risk Management



As a group which owns and operates motorways, NWRG is exposed to a number of modern slavery risks in our supply chain and operations.

To manage these risks appropriately and improve our actions to address them, we must first understand them, including where we might cause, contribute to or be directly linked to modern slavery.

3.1 Modern Slavery Risk Assessment

In 2024, NWRG undertook a thorough reassessment of modern slavery risks **across our business areas**. This assessment provided valuable insights into our operations and supply chain, identifying areas of potential exposure to modern slavery.

Operations Risk Assessment

During FY24, NWRG conducted an Operations Risk Assessment to identify and mitigate modern slavery risks across its operations. This assessment was carried out as a desktop review led by Edge Impact and informed by publicly available resources such as the Global Slavery Index. NWRG assessed the modern slavery risk associated with its direct workforce, which comprises 25 permanent employees employed by NWR under a Management Services Agreement with NWRG. These employees are engaged in professional or technical roles based in Australia,

a jurisdiction generally considered to have a low risk of modern slavery. Employees are covered by comprehensive entitlements, including above-award wages, superannuation, leave benefits, and access to formal grievance mechanisms. These factors informed our conclusion that the risk of modern slavery within our direct workforce is minimal. As previously stated, NWRG does not directly employ workers. Subcontracted roles have been assessed within the scope of our supply chain risk assessment below.

Supply Chain Risk Assessment

As modern slavery risks are more likely to arise in our supply chain, we focused our risk assessment in this area. To evaluate supply chain risks, we engaged the expertise of Edge Impact to screen our FY23 spend using their proprietary risk screening tool. This tool draws from best practice global databases, including Exiobase, the Social Hotspot Database, the Global Slavery Index and a comprehensive media and literature review. Each spend category, including design and construction services, core services fees and infrastructure renewal, was analysed to determine the likelihood of modern slavery risks. The assessment applied a life cycle methodology,

which estimates modern slavery risks across global supply chains. The risk was assessed with a focus on potential harm to people, considering geographic (country level) and product or service specific risks. This approach adheres to internationally recognised standards and frameworks, reinforcing NWRG's commitment to responsible business practices. Through this assessment, we gained a comprehensive understanding of the modern slavery risks in our supply chain and alignment on pragmatic actions to address identified risks in the future.

3.2 Our Priority Risk Areas

To better manage our modern slavery risks, we need to understand those specific to our business and the industries we work across. It’s important to note that while these risks don’t indicate a problem within NWRG, they do highlight the level of potential risk that this impact might occur. Based on these priority risk categories in our services (business operations) and materials (supply chain), we can also identify priority risk factors and how we might directly or indirectly contribute to them.



Priority Risk Categories:
Services and Materials

Informed by our modern slavery risk assessment and the life cycle methodology of services and materials, NWRG has identified the following priority risk categories.



Category	Risk
Design and construction	Services and materials
Tolling system equipment	Services and materials
Landscaping	Services and materials
Repair and maintenance	Services and materials
Personal protective equipment	Materials
Operational Management and Control Systems (OMCS)	Services and materials
Cleaning	Services

Risk Factors: Materials

The construction sector has an **elevated risk** of modern slavery due to its fragmented and complex supply chain and the fact that many stakeholders take part in delivering projects.

The key risks specific to NWRG include forced labour and child labour in the supply chain of materials such as cement, metals and minerals which we use for the maintenance and construction of our assets.

Our recent modern slavery risk assessment found that over 50% of our highest-risk categories by spend are related to construction materials and services, including raw extraction and manufacturing of materials, specifically in the design and construction category.

Whilst 100% of NWRG’s materials spend is within Australia, modern slavery risks still occur across various stages of the supply chain. The modern slavery risk assessment took a life cycle approach to address this and identify potential social impacts such as labour conditions, worker rights and known cases of modern slavery associated with the life cycle of relevant materials and services. In Australia, subcontracting and outsourcing are standard practices,

- creating elevated risks due to challenges in monitoring and enforcing labour standards throughout the entire chain.
- From the assessment, we identified these high-risk categories:**
- Sourcing materials or equipment that are extracted from or manufactured in countries with weak labour regulations;
 - Complex and fast-moving global supply chains;
 - Reliance on lower-skilled labour across supply chain;
 - Absence of grievance mechanisms in manufacturing facilities;
 - Lack of transparency across the supply chain at each stage of the product life cycle, shipping and transport;
 - Deceptive recruitment practices, including false promises related to wages, working conditions and contract terms.

The following infographic represents the **life cycle of products and materials procured by NWRG** and the risk factors that increase modern slavery risk.



Figure 2. Life cycle of products and materials



Risk Factors: Services

NWRG relies on many skilled professionals to provide services across our business, including landscaping, construction, hospitality, printing, transport and repairs and maintenance.

Our business comprises a small team of less than 30 permanent employees and five contractors, with direct and subcontracted labour hire sourced through a Management Services Agreement with NorthWestern Roads Management Services Company (referred to as 'NWR'). Within this services supply chain, specific risks exist, including forced labour, where workers may be coerced or forced to work against their will, and wage exploitation and underpayment of workers.

Our recent modern slavery risk assessment found that over 50% of our highest-risk categories by spend are related to construction materials and services, including labour service in construction, maintenance, cleaning, IT services and security.

- Within our service and labour hire spend categories, the assessment identified the following potential risk factors:**
- Difficulty in achieving proper oversight and due diligence on subcontractors;
 - Reliance on temporary and migrant workers who may be isolated or face higher risks due to language barriers and unfamiliarity with local laws;
 - Use of third-party recruitment;
 - Reliance on lower-skilled labour;
 - Absence of grievance mechanisms on-site;
 - Deceptive recruitment practices, including false promises related to wages, working conditions, debt bondage, and contract terms;
 - Retention of identity documents.

This infographic demonstrates the **services procured by NWRG** and the risk factors that increase modern slavery risk.

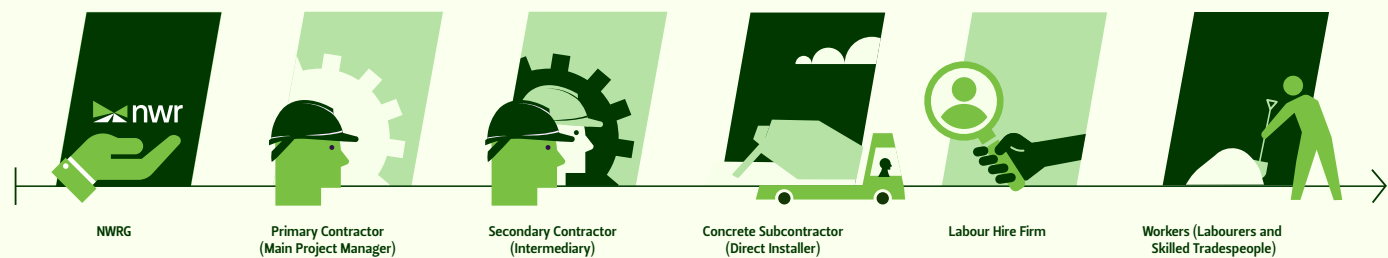


Figure 3. Life cycle of services

Case Study #2
Creating a Modern Slavery Audit Checklist

Our supply chain is complex, and as part of our supplier management and quality assurance efforts, NWR employees occasionally visit supplier sites, including manufacturing and field locations.

These visits also provide an opportunity to gain valuable insights into the treatment of workers in our supply chain. To help our employees capture these observations, we developed an “audit for non-auditors” checklist in FY24, allowing them to note any potential concerns during their visits.

The checklist, combined with the modern slavery training NWR employees receive, enables

them to recognise key indicators of worker mistreatment, such as inadequate PPE, unsafe practices, absence of a complaint mechanism or the presence of child labour. By recording these observations in a structured way, NWR can follow up on any areas needing further investigation.



/04

Addressing and Mitigating Risks

NWRG understands that our modern slavery risks are constantly evolving, and as such, they require a risk management strategy that adapts to stay ahead of these changes.

Through governance and policies, stakeholder engagement and the creation of a risk management framework, we're proactive about improving how we address and mitigate these risks in our operations and supply chain. As we aim to integrate these considerations into our business, we'll also work toward NWRG's broader goal of managing our assets responsibly, ethically and sustainably.

4.1 Governance

Effectively addressing and mitigating the risks of modern slavery in our operations and supply chain requires a collaborative approach across the business, and an understanding that everyone in our team has a role to play. In line with this, our internal modern slavery working group includes representatives from business areas, including asset management, finance, technology and risk, coordinating its assessment of the overall NWRG risk and engagement with key supply chain partners. Alongside shareholder subject matter experts, the working group informs and advises on risks and impacts to help prepare the annual Modern Slavery Statement.



Case Study #3

Updating Our Whistleblower Policy

Identifying and addressing our modern slavery risks requires many inputs, with the most valuable coming from those directly within our supply chain and operations.

In August 2023, NWRG updated its Whistleblower Policy, an important tool in helping us identify issues or conduct that might not otherwise be reported, to explicitly mention modern slavery. We shared the updates with the NWR team, including a training video on how to use the Policy, and then made the resources available on our intranet.

Alongside the Policy, we maintained our whistleblower hotline, so that anyone with concerns about modern slavery, potential human rights issues or unethical behaviour in NWRG's

operations and supply chains has a channel to report them anonymously. Although we've received no reports to date, we recognise the importance of having this channel available and are committed to continuously improving our grievance mechanisms as part of our journey.



4.2 Policies

NWRG has a number of policies and procedures that shape our formal framework for identifying, addressing and reducing risks of modern slavery within our operations and supply chain.

These documents also help our employees, contractors and suppliers understand their responsibility and compliance. As with previous reporting periods, we continuously update our Policy Framework to reflect any changes to modern slavery risks, impacts or legislations.

Policy Tool	Relevance to our Anti-Modern Slavery Approaches
NWR People Policy	Articulates the requirements for ensuring team members are legally permitted to work in our business, including compliance with relevant visa conditions.
NWR Code of Conduct	Defines how we do business and outlines the standards of behaviour expected from our team members and leaders.
NWR Sustainability Policy	Outlines our commitment to respecting human rights, and our pathway to achieving our commitments.
NWR Purchasing Policy	Declares how purchasing decisions are to be made, including how to consider non-price attributes in our contracting processes.
NWR Model Contract Clauses	This library of clauses is used in contracts for key materials (either during initial onboarding or renewals) to incorporate requirements to comply with the Supplier Code of Conduct.
NWR Supplier Code of Conduct	Sets our expectations and requirements on modern slavery, human rights and other key considerations.
NWR Risk Policy	The Policy outlines strategies and controls for mitigating and managing risks, including consideration of third party reputational and social risks.
NWR Modern Slavery Risk Register	A risk register that details our latent risk level and category level controls for managing modern slavery risks.
NWR Whistleblower Policy	Independent service which provides a publicly accessible mechanism to report any breach of the law or NWR’s code of conduct, such as criminal conduct, fraud or unethical behaviour.
NWR Supply Chain Modern Slavery Remediation Guideline	Outlines how NWRG would respond to, investigate and remediate reports of modern slavery identified in our supply chain.

Table 4. Policy Framework

Our **Modern Slavery Governance Framework** demonstrates how NWRG’s stakeholders and business functions are involved in identifying, addressing and managing modern slavery risks.



Table 3. Modern Slavery Governance Framework

4.3 Capability and Awareness

NWR understands that improving the skills and capability of our people, including providing specific training on modern slavery, can help us identify and manage these risks more effectively.

Modern Slavery Training

NWR delivers annual baseline awareness training on modern slavery as a team meeting for employees. Employees not in attendance are advised to review the recorded meeting content afterwards. This training informs employees about modern slavery risks and key risk indicators to be mindful of.



4.4 Stakeholder Engagement

Building strong relationships with our partners and suppliers is paramount to understanding and addressing the modern slavery risks in our supply chain. These actions from this Reporting Period were helpful in improving engagement and transparency in addressing modern slavery risks with our stakeholders.

Regular Meetings with Key Suppliers

We continued our process of meetings twice a year with the operations and maintenance suppliers for NorthConnex and Westlink M7. As most of our spend is with these suppliers, it's vital we continue to gain insights into their supply chains, including any changes we should be informed of.

Attended Industry Events

During this Reporting Period, NWRG attended two events to remain informed on modern slavery and broader ESG requirements in the infrastructure industry, including the Fair Supply 'Future of Modern Slavery Reporting' event and Allens' and QIC's online ESG forum.

Modern Slavery Mitigation Clauses in Contracts

In reviewing contracts with suppliers, we requested the inclusion of a modern slavery mitigation clause. NWRG aims to include this clause, if it doesn't already exist, in all supplier contracts moving forward.

Engaged With Suppliers on Internal Training and Grievance Management Processes for Modern Slavery

We engaged with our Westlink M7 operations and maintenance supplier to learn more about their internal processes for training employees on modern slavery and to share training information. They also provided evidence of their internal process for managing a grievance relating to modern slavery.

Case Study #4
Delivering Modern Slavery Training

All NWR employees have a role in identifying and managing modern slavery risks within our operations and supply chain.

In FY24, NWR engaged Edge Impact to deliver a one-hour online training session to Procurement and Project Managers, enhancing their understanding of modern slavery risks and legislative requirements. Tailored to NWR's operations, and the role of the procurement professional, the session explored the complexities and root causes of modern

slavery, focusing on identified high-risk areas such as construction materials and the use of subcontracted labour. Participants learned practical strategies to identify risks, engage suppliers, and follow ethical practices in procurement.



4.5 Risk Management Framework

Applying insights from our modern slavery risk assessment, NWRG developed a due diligence process that informs our risk management framework for suppliers, allowing us to continually evolve and improve our response to modern slavery in our supply chain.

The framework also helps us be as conscientious with new suppliers as we are with existing ones, setting expectations before we commence relationships so that we're aligned on our commitment to human rights.

The level of risk assigned to each supplier determines the due diligence actions we take. As the risk increases, so does the number of actions, the level of assessment and the information we require from the supplier.

The process includes:

- Share our Supplier Code of Conduct;
- Conduct a thorough media and desktop scan of the supplier;
- Ensure there is a preference for certifications in specific categories;
- Complete the “Audit for non-auditors” checklist when visiting factories;
- Request Tier 1 suppliers to share their audits and supply chain findings.

4.6 Grievance and Remediation

Integrity is one of our core values, and upholding it ensures our customers, suppliers, shareholders and employees have confidence in NWRG. As such, we must be aware of any concerns relating to an actual or suspected violation of our policies, codes, human rights (including labour rights), health, safety and environmental obligations and other business integrity issues, with these grievance and remediation mechanisms supporting the process.

- **NWR Whistleblower Service**
Our independent and confidential whistleblower service is available for anyone aware of, having witnessed or suspecting any reportable conduct. We investigate reports to this service, treating each one seriously and confidentially. The service is available 24/7 on 1800 500 965.
- **NWR Supply Chain Modern Slavery Remediation Guideline**
The Guideline is a formal grievance mechanism, informing NWR employees about raising issues and reporting or responding to potential instances of modern slavery within our supply chain.
- **NWR Grievance and Complaint Handling Procedure**
As part of the NWR Supply Chain Modern Slavery Remediation Guideline, this procedure outlines specific steps for NWR employees to take when a grievance has been raised.

Case Study #5
Screening for High-Risk Steel

In FY24, we began construction of our M7–M12 Integration Project, incorporating the widening of the M7, the construction of an interchange between M7 and M12, and the Elizabeth Drive Connection.

The design and construction contractor for this project is one of NWRG’s key Tier 1 suppliers, with whom we have an existing strong and collaborative relationship, specifically regarding addressing modern slavery. For this project, they were responsible for delivering most services and materials, including higher-risk elements such as steel.

To better understand these material inputs and identify modern slavery risks, we established a forum with our partner to support them in

performing an additional supply chain analysis. Our contractor demonstrated their process for seeking assurance, including modern slavery warranties for the steel they procured from China. We also began formal discussions with the contractor’s Commercial Manager on their modern slavery process, with confirmation on these expected in FY25. Through a tailored approach to risk management, NWRG aims to be more thorough in identifying risks, further strengthening our collaborative supplier relationships.

Case Study #6
Updating Our Grievance Mechanisms

Having effective grievance mechanisms in place is essential for uncovering modern slavery risks in supply chains and business operations.

To effectively address and resolve concerns specific to NWRG, we require input from workers in our supply chains and business operations. So that our people know how to report and respond to these instances, we updated the NWR Supply Chain Modern Slavery Remediation Guideline in FY24, also sharing it with our suppliers.

The comprehensive new Guideline aims to help our staff understand the process for raising issues and reporting concerns around modern slavery in our supply chain. It also provides clear direction

on information collection, confidentiality and use of external resources, including legal counsel, independent investigators and relevant authorities. So that the Guideline continues to serve as an effective grievance mechanism and offer pertinent advice, NWRG plans to update it regularly.

/05

Measuring Effectiveness

NWRG assesses the effectiveness of its actions to assess and address modern slavery risks by identifying key goals aligned to its areas of highest risk, and tracking progress against those goals on a periodic basis.



5.1 FY23’s Goals and Progress

Area	FY23 Goal	Progress
Risk Assessment	Engage an external consultant to review NWRG’s risk assessment approach against contemporary practice	Complete: Engaged Edge Impact to update NWRG’s modern slavery risk assessment with life cycle assessment methodology.
Governance	Finalise the review of our Whistleblower Policy to specifically identify modern slavery as a reportable conduct	Updated: Whistleblower Policy has been updated and modern slavery has been explicitly called out.
	Conduct role specific training for employees with responsibility for key modern slavery risks	Complete: Edge Impact delivered modern slavery training to key decision-makers, informing them how to support the mitigation and identification of modern slavery risks within NWRG. NWRG’s Safety, Environment and Stakeholder Manager’s annual refresher training updated employees on modern slavery risks and issues.
Due Diligence	Establish a collaborative forum with the contractor delivering a large civil project for NWRG	Complete (and ongoing): NWRG established a forum with the Contractor’s Commercial Manager to liaise on modern slavery process, with the finalised report duly submitted in August 2024.
	Standardise collaborative efforts with key Tier 1 suppliers	Complete (and ongoing): Routine meeting with key suppliers twice a year to understand any changes or concerns in their supply chains.
	Commence additional analysis of supply chain to examine category detail (e.g. greater understanding of material inputs)	Ongoing: One key contractor for M7–M12 Integration Project demonstrated their process for seeking assurance on modern slavery, including modern slavery warranties for high-risk materials.
Grievance and Remediation	Review grievance accessibility and identify if actions can be taken to ensure access to vulnerable workers in our supply chains	Ongoing: NWRG’s updated grievance mechanisms have been shared with suppliers and on our website. We are continuing to identify areas with a lack of coverage and will update these as they become visible.

Table 5. Update on Last Year’s Commitments

/06

Next Steps



6.1 Future Commitments

Area	Commitment	Success Criteria
Risk Assessment	Refine the procurement process to tailor the shape of tender return schedules based on defined risk profiles	Update procurement process with embedded risk profiles.
	Develop a clear interpretation guide for self-assessment questionnaires (SAQ) and tender return schedules that screen potential suppliers and inform the nature and terms of a supplier relationship beyond contract signing	Publish a defined return schedule guidance document and train employees responsible for using it.
Governance	Refine and update modern slavery KPIs	KPIs have been developed, refined and shared with key stakeholders.
	Update Supplier Code of Conduct	Include explicit mentions of modern slavery and an invitation to collaborate and share information with suppliers for more effective identification and remediation of modern slavery cases.
Due Diligence	Review supplier onboarding questionnaire	To assess if we are asking suppliers the right questions and identify the next steps to take based on their responses.
	Discuss modern slavery provisions in the upcoming onboarding of a new technology supplier	Inclusion of modern slavery mitigation clauses in request for quotes (RFQ) and contracts.
Grievance and Remediation	Define informal and formal channels where NWRG may receive grievances	Define grievance pathways, such as the whistleblower hotline and direct interaction between employees and contractors.
	Develop an approach to improve grievance accessibility with key suppliers and subcontractors in priority high-risk contexts	Communication strategy developed for grievance pathways.

Table 6. Our future roadmap

Approval

The purpose of this Statement is to provide general information only as required by the Modern Slavery Act and is correct as at the date of publication.

NorthWestern Roads Group Pty Ltd and NorthWestern Roads Group Nominees Pty Ltd (as trustee for the NorthWestern Group Trust) are the parent companies of the reporting entities within NWRG (including, for the avoidance of doubt, all reporting entities listed in this Statement). This Statement was approved by the Boards of the NorthWestern Roads Group, being the principal governing bodies of each of the reporting entities respectively, on 25 November 2024.

Penny Graham

Penny Graham

Chair of NorthWestern Roads Group