

## MODERN SLAVERY STATEMENT

### Introduction

Modern slavery describes the most serious forms of exploitation including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Ventura takes a zero-tolerance approach to any form of human rights abuses as defined by the Commonwealth *Modern Slavery Act 2018* in our operations and supply chains.

### Our structure, operations, and supply chains

#### *Our structure and operations*

Ventura Motors Pty Ltd ABN 67 004 235 518 is a privately-owned Australian company registered in Dandenong, Victoria, Australia.

Ventura Motors 100% owns and controls eleven active entities for the purposes of bus operations, mechanical support, property, and finance.

Ventura Motors has produced this Modern Slavery Statement for the reporting period 1 July 2021 to 30 June 2022.

Ventura has been providing bus services since 1924, has twelve (12) depots based in the East, South, Peninsula and North of Melbourne, operates 900+ buses across the network, employs approximately 1800 employees and carries over 17 million passengers each year.

Ventura provides a full range of commercial bus services, including:

- Department of Transport (DoT) route and school services
- Department of Education & Training (DET) services
- Shuttle Services
- Charter Bus Services
- Private School Charter Bus Services
- Night Network Bus Services
- Tram Replacement Services
- Coach Services

#### *Our Supply chain*

To deliver these services Ventura has an extensive network of suppliers and subcontractors providing products and services, including buses, fuel, parts and maintenance, tyres, road tolls, cleaning services, property maintenance, recruitment and training, charter bus operators, insurances, uniforms and personal protective equipment, professional services, utilities and IT software and hardware.

## **Risks of modern slavery in our operations and supply chains**

### *Operations*

As Ventura only operate in Victoria the risk of causing or contributing to modern slavery through the use of labour is considered a low geographical risk as:

- all employees are covered under employment agreements underpinned by the National Employment Standards
- there is very little use of labour hire to deliver services

However, it should be noted that the use of the labour hire industry is still considered an industry risk which requires management.

### *Our supply chains*

A significant number of suppliers of products and services operate in Victoria therefore considered a low geographical risk of modern slavery practices. Contractors who perform work for Ventura are not directly controlled by Ventura meaning that it cannot control all working conditions for workers in its supply chain and does not always have direct oversight over workers in its supply chain.

Ventura recognises the purchasing of products and materials such as fuel, some bus body and chassis, parts, tyres, uniforms, IT software and hardware are sourced from international suppliers thus being a higher geographical risk.

Ventura also sources services from suppliers in industries that are considered an industry risk for example cleaning services. These risks potentially expose Ventura to being directly linked to modern slavery practices which requires management.

## **Actions taken to assess and address the risk of modern slavery**

### *Policies and Procedures*

#### *Modern Slavery Policy*

Ventura has developed a Modern Slavery Policy that sets out Ventura's position against modern slavery. This policy applies to all Ventura companies, employees within Ventura and we expect contractors, subcontractors, and suppliers to apply similar standards.

Other Ventura policies and standards updated to directly influence our behaviours towards Modern Slavery and include:

- Ventura Code of Conduct
- Ventura Values
- Ventura Whistle-blowing Policy
- Ventura Control of externally provided processes, products, and services

These policies and standards have been enhanced to establish an ethical culture and environment which will not tolerate human slavery or abuse to enter Ventura's operations or supply chain.

#### *Review of operations and supply chains*

Ventura's Procurement Group will initially assess suppliers with an annual spend greater than \$50,000 and identify potential operations and supply chain modern slavery risks.

Geographical and industry risk assessments will be undertaken to identify at risk suppliers and contractors relating to modern slavery.

#### *Supplier Questionnaire*

Ventura have developed a Supplier Questionnaire which will seek confirmation that our suppliers are acting in accordance with Ventura's Modern Slavery Policy.

Ventura's Supplier Questionnaire will be distributed to those suppliers deemed high risk and if a supplier fails to confirm they are acting in accordance with the Ventura's Modern Slavery Policy this may result in termination of their supplier contract.

#### *Training*

Breaches of the above-mentioned policies is dependent on our employees identifying and reporting these potential breaches. Therefore, it is vital that our employees are aware of what human rights and modern slavery issues are.

Ventura's Procurement Group have completed customised training to ensure those employees who manage the supplier and contractor relationship have a good understanding of what modern slavery issues and relevant policies are.

#### **Assessment and effectiveness of our actions**

Ventura recognises the importance of monitoring how effective our anti- modern slavery processes are, and we are actively taken steps to review our approach to assessing and addressing modern slavery risks.

Ventura's Procurement Group meet regularly and has a standard agenda item to discuss actions taken and their effectiveness in relation to modern slavery risks.

Procurement Group members have ongoing training to identify and act upon risk in day-to-day operations.

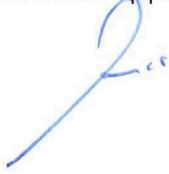
### **Consultation with other entities**

Ventura's Modern Slavery Statement is a result of consultation and collaboration between the senior management group.

Ventura Motors as the Modern Slavery Statement reporting entity, is associated with several other entities that it owns and controls. All Ventura entities adhere to the same organization-wide policies and procedures including the Ventura Modern Slavery Policy.

### *Approval*

This statement was approved by the Ventura board on 14<sup>th</sup> December 2022.

A handwritten signature in blue ink, appearing to be "A. Cornwall", written over a faint blue line.

Andrew Cornwall  
Managing Director