

A man with short brown hair, wearing a blue blazer over a white t-shirt, stands on a tram platform. He is looking towards the left, where a tram is visible. The background shows a city street with buildings and other people, slightly blurred.

Modern Slavery Statement

Transdev Australasia & Yarra Journey Makers | 2025





Transdev Group is a team with over 107,000 members, transporting an average of 14 million people every day in 19 countries. We empower freedom to move every day thanks to safe, reliable and innovative solutions that serve the common good. This is our purpose, what unites us and motivates us every day, and our compass for decision-making.

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Acknowledgment of country

Transdev Australasia Pty Ltd (‘Transdev’) and Yarra Journey Makers Pty Ltd (‘YJM’) acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands on which we live and work across Australia.

We pay our respects to Elders past and present and acknowledge the continuing connection of Aboriginal and Torres Strait Islander peoples to land, waters, culture and community.

We acknowledge the historic and ongoing impacts of colonisation on First Nations Peoples, including dispossession, systemic injustice and intergenerational trauma, and recognise that these impacts continue to shape lived experience today.

We also pay our respects to the Maori people as the Tangata Whenua Aotearoa (people of the land in New Zealand), and the Tiriti o Waitangi (Treaty of Waitangi).

Transdev and YJM are committed to advancing reconciliation and strengthening respectful relationships between Indigenous and non Indigenous peoples, for the benefit of all across our Australasian footprint.

What is Modern Slavery?

The term ‘Modern Slavery’ in the Modern Slavery Act 2018 (Cth) (the Act) is used to cover several types of exploitative practices including:

- (i) trafficking in persons;
- (ii) slavery;
- (iii) servitude;
- (iv) forced marriage;
- (v) forced labour;
- (vi) debt bondage;
- (vii) deceptive recruiting for labour or services; and
- (viii) the worst types of child labour (including where children are subject to slavery or similar practices, or engaged in hazardous work).

These practices undermine individual freedoms recognised under the Universal Declaration of Human Rights.



CEO introduction and purpose of this statement

We are proud to report that 2025 was a year of steady and sustainable growth for Transdev and YJM. Our operations continued to deliver public transport services for communities throughout Australia and New Zealand supporting passenger commutes to work, home, schools, and in and out of cities.

A contributor to our success includes ensuring that we continue to promote transparency and ethical business dealings throughout our operations and supply chains. We recognise the human rights of each individual and condemn modern slavery in all its forms. As a company, we are committed to sound environmental, social and governance practices, and ensure that robust standards of business conduct are understood and valued by those that work at and work with Transdev and YJM. We recognise the joint effort and contribution expected from us, our stakeholders and those within our community to prevent and address the risks of modern slavery. We are determined in ensuring that we embed the right practices and processes so that no person’s freedom is denied.

This Statement is made pursuant to section 14 of the Act by the reporting entity, Transdev Australasia Pty Ltd for the year 01 January 2025 to 31 December 2025. Transdev Australasia Pty Ltd is a proprietary entity limited by shares incorporated under the Corporations Act 2001 (Cth), and is the parent company, related and/or controlling entity of the reporting entities outlined on page 15. This Statement is also made on behalf of those reporting entities. Therefore,

- any reference to “Transdev” is a reference to Transdev Australasia Pty Ltd and its controlled entities;
- any reference to “Transdev and Yarra Journey Makers Pty Ltd (‘YJM’),” “us,” “our,” or “we” is a reference to Transdev Australasia it’s controlled and related entities as a collective; and
- any standalone reference to “Yarra Journey Makers” or “YJM” is a reference to Yarra Journey Makers Pty Ltd only.

This Statement describes the steps and initiatives taken by Transdev and YJM to prevent and manage modern slavery risks that may exist or arise within our organisation and/or supply chain in accordance with the below mandatory reporting criteria under the Act.

Mandatory Criteria	Page
Identify the reporting entity	15
Describe the reporting entity’s structure, operations and supply chains	15-17
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	18-20
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	22-24

Mandatory Criteria	Page
Describe how the reporting entity assesses the effectiveness of these actions	26-30
Any other relevant information (Future outlook)	32
Describe the process of consultation with any entities the reporting entity owns or controls	34

We recognise that modern slavery risks may potentially exist within our operations and supply chain. However, we are committed to working with our stakeholders, contractors, and suppliers in preventing and mitigating modern slavery risks and impacts to the best of our abilities.

The continued implementation of Transdev’s Sustainable Procurement Action Plan (SPAP) helps to ensure that objectives are addressed and reflected in Transdev’s procurement practices. The SPAP was developed with the support of external experts (informed by completion of a gap analysis of existing procurement processes at the time and mapping risks and opportunities inherent in Transdev’s supply chain). The SPAP was launched in 2020 and has been an integral part of Transdev’s business procurement practices since.

The objectives relating to human rights and modern slavery, within the SPAP include:

- ensuring all businesses operate in accordance with the Act including all future amendments to the legislation.
- ensuring Transdev’s employees understand modern slavery.
- providing people with appropriate avenues for reporting potential instances of modern slavery within Transdev’s operations and within the operations of Transdev’s suppliers.
- mitigating modern slavery risk within Transdev’s operations.
- eliminating potential and/or actual modern slavery practices from Transdev’s operations and supply chains.

The SPAP continues to influence the way in which Transdev does business, and it complements its existing governance and risk management practices in Australia, New Zealand and globally (as we are part of the European headquartered Transdev Group S.A (‘Transdev Group’)). Our approach demonstrates our commitment to meeting our communities’ expectations, to improve trust and respect among all employees and our stakeholders.

Sincerely,

Brian Brennan



Section 1 | About us

We are a multi-modal transport operator with a presence across Australia and New Zealand employing over 7,100 people. This figure also includes 2,500 employees from Yarra Journey Makers Pty Ltd (YJM). In 2025, collectively we delivered 271 million+ bus, ferry, light rail, tram and train passenger journeys across Melbourne, Sydney, Brisbane, Perth, Wellington and Auckland.

Transdev's roots stem from Europe, as our parent company, Transdev Group is French and German owned, with the headquarters located in Paris, France. Transdev Group is an international organisation employing over 107,000 people worldwide delivering services everyday across 19 countries, and 5 continents.



Transdev Sydney Light Rail

Transdev has operated the Inner West Light Rail on behalf of Transport for New South Wales for over 20 years. The 12.7 kilometre route connects Central Station and Dulwich Hill. The ALTRAC Light Rail consortium (of which Transdev is a partner) is also the successful contractor to operate and maintain the new CBD to South East Light Rail network. These two networks combined complete more than 41 million journeys per year.

Great River City Light Rail

In 2024, we commenced the operation of the Parramatta Light Rail connecting Westmead to Carlingford via the Parramatta CBD and Camellia with a two-way track spanning 12 kilometres, increasing mobility options.



Transdev Sydney Ferries

Since 2012, we have been proudly operating Sydney's iconic fleet of ferries, and the Balmain Shipyard, under a unique partnership with the NSW Government. With a workforce of more than 650 Journey Makers, we deliver a new age of customer-centric, efficient and innovative transportation, providing access to other transport modes across Sydney.

We operate the iconic Sydney Ferries fleet with seven different classes of vessels, covering 38 wharves over ten key routes.



Transdev Queensland (Bus)

Transdev operates bus services in Queensland (including school charter services). Our people are committed to connecting communities across Brisbane, Redlands and greater South East Queensland.



Transdev Western Australia (Bus)

Transdev Western Australia is a leading bus operator, delivering services on behalf of Transperth. We cover more than 22.5 million kilometres each year, providing safe, reliable, and accessible public transport services across Perth’s metropolitan and regional communities.



Mana Newlands (Bus)

We are a growing business that serves the Wellington community. Founded in 1984 by the Waddell Family, we have grown from a small bus operator to a key Wellington transport service that is a recognisable brand in the local community.



Transdev Wellington (Heavy Rail)

In Wellington, we work in partnership with Hyundai Rotem to operate and maintain the city’s passenger train network on behalf of Greater Wellington Regional Council.



Transdev John Holland Buses

Transdev has extensive bus operating experience in New South Wales. Over the last 4 years, the joint venture between Transdev and John Holland has been operating the Region 9 bus services around the Eastern Suburbs of Sydney. The business is dedicated to providing safe, reliable and enjoyable transport for clients and customers across the region.



Howick and Eastern (Bus)

Transdev Howick & Eastern operates urban bus routes and school services in Auckland, providing essential connections between the eastern suburbs and the city centre.



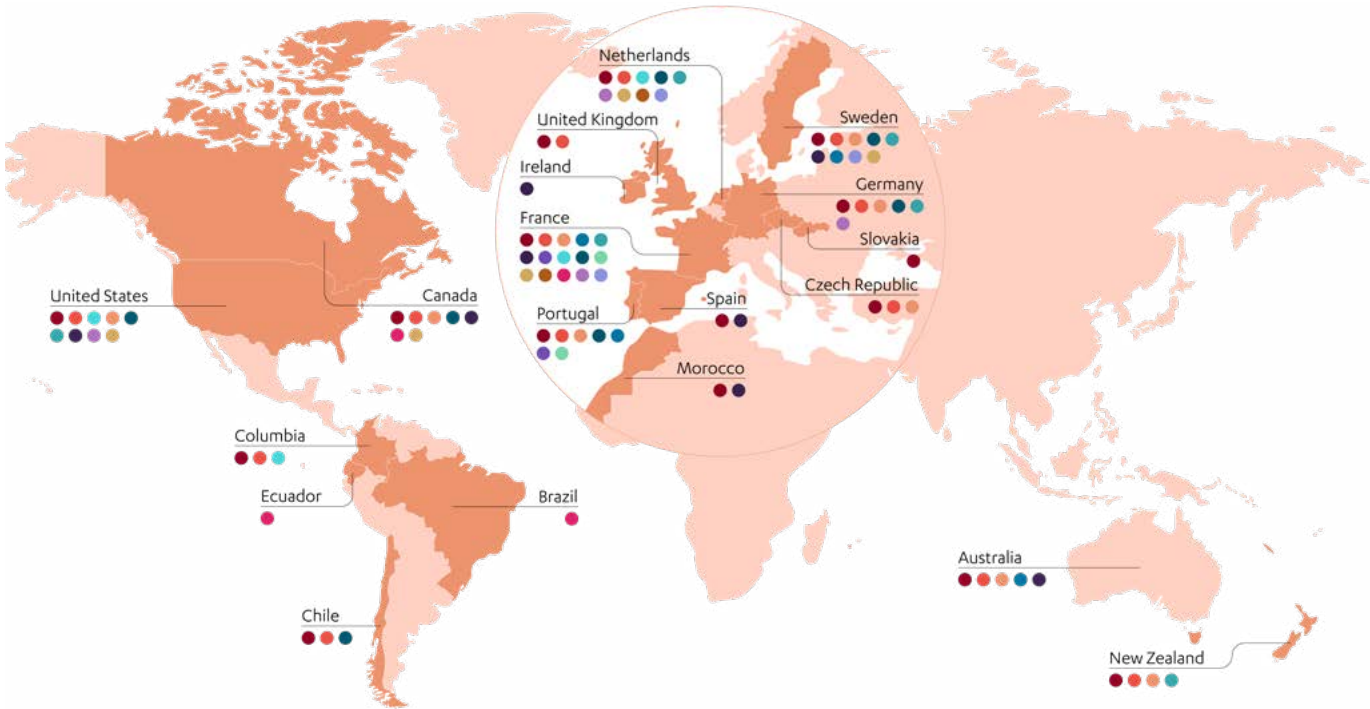
Yarra Trams

Yarra Journey Makers is a joint venture between Transdev and John Holland which commenced operation of Melbourne’s tram network December 2024. The iconic tram network spans 24 routes, with 250 kilometres of double track, around 500 trams, and over 1600 stops.

Our purpose and approach

Our approach is rooted in long-term partnerships with communities, businesses and public transport authorities. We strive to be at the forefront of providing safe, reliable, and innovative transport solutions to meet the needs of today and tomorrow, empowering communities and contributing to more liveable cities and the most innovative mobility solutions.

Transdev and YJM are committed to providing mobility services to commuting passengers, whilst also acting in a way, that is exemplary and consistently meeting and exceeding community, customer, and client expectations.



- Key**
- | | | | |
|----------------------------|-----------------------|--------------------------|--------------------|
| Bus | Rail | Transportation on-demand | Metro |
| Electric & hydrogen bus | Light Rail | Cable car | Autonomous vehicle |
| Coach | Bicycle share-service | Paratransit | Ambulance |
| Water borne transportation | Bus rapid transit | Community bus | |

14 M
Customer journeys
every day

19
Countries

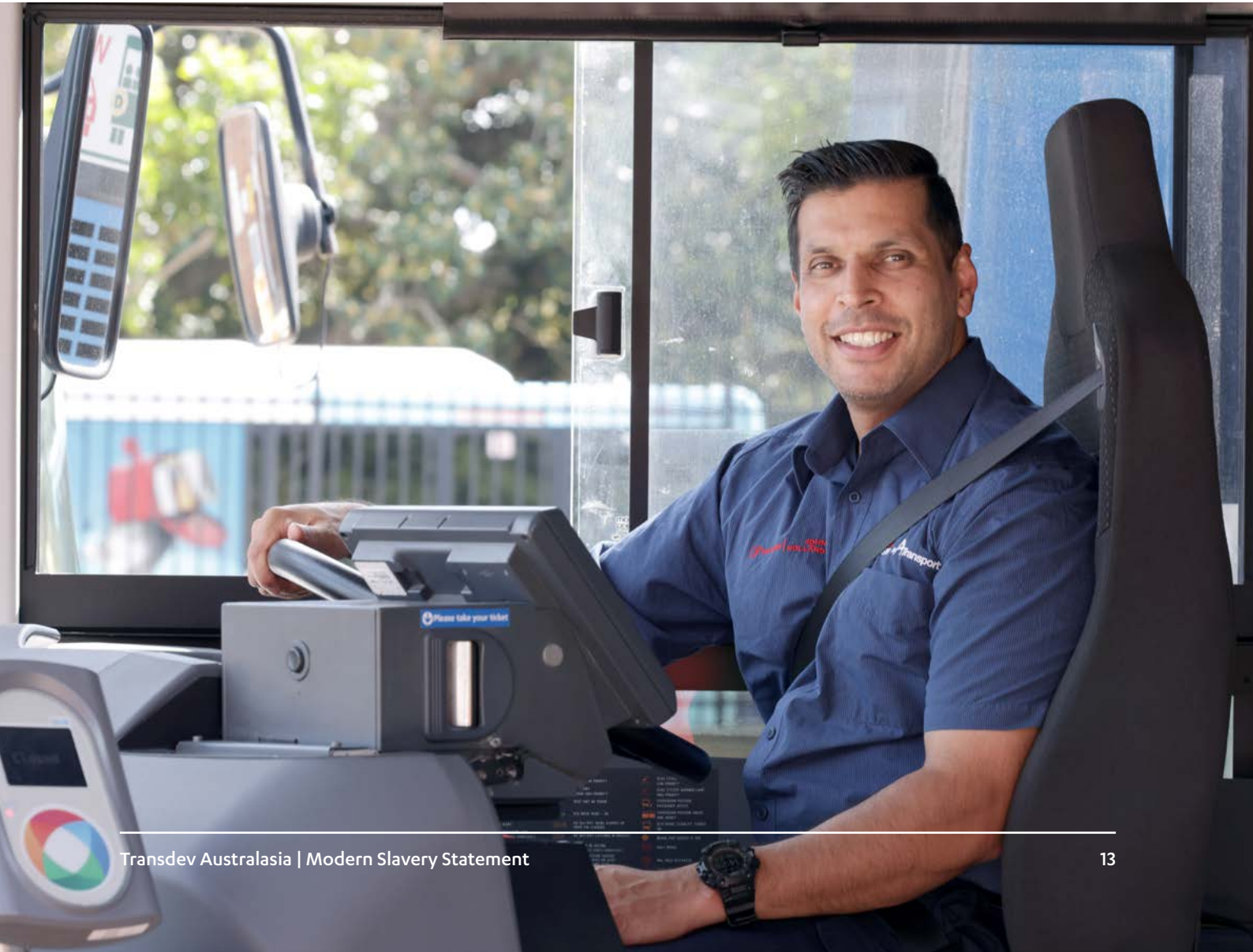
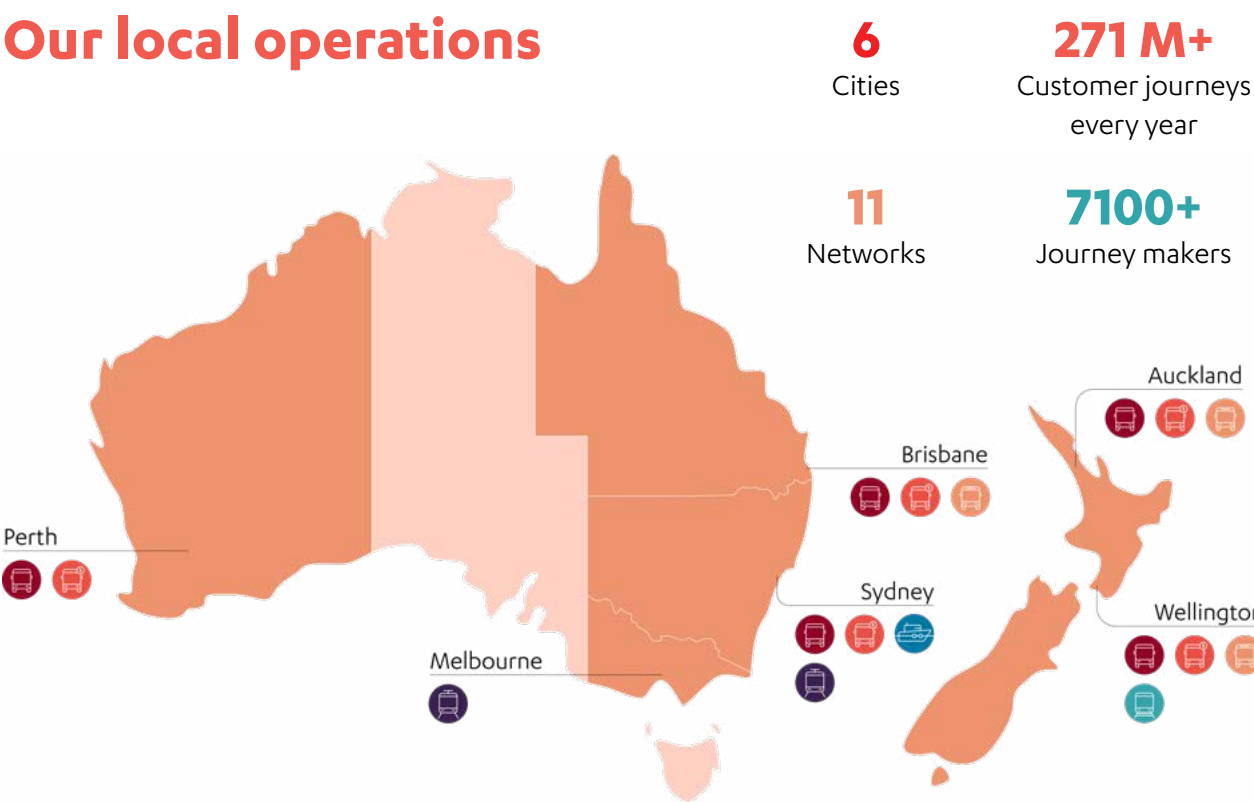
16
Transport modes

107,000
Journey makers

2,626
'Zero emission' buses
and coaches

60,885
Vehicles operated
world wide

Our local operations





Our company structure is as displayed in the table below:

Parent Company	Controlled Entities/Related Partners	Operating Model	Legal Structure
Transdev Australasia 100%	Transdev WA Pty Ltd	Bus public transport and charter services	Proprietary companies limited by shares incorporated under the Corporations Act 2001 (Cth)
	Transdev Queensland	Perth and Brisbane	
	Transdev Sydney Pty Ltd	Light Rail public transport services in Sydney	
	Transdev Sydney Ferries Pty Ltd	Ferry public transport services in Sydney	Companies limited by shares registered under the Companies Act 1993 (NZ)
	Howick & Eastern Buses Ltd	Bus public transport and charter services in Auckland and Wellington	
	Mana Coach Services Ltd		
	Transdev Wellington Ltd	Rail public transport services in Auckland and Wellington	
Transdev Australasia 70%, CAF Rail Australia 30%	Great River City Light Rail Pty Ltd	Supply, operate and maintain Paramatta light rail network in Sydney	A proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth)
Transdev 75%, John Holland 25%	Transdev John Holland Buses (NSW) Pty Ltd	Bus public transport and charter services in Sydney	A proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth)
Transdev 51% John Holland 49%	Yarra Journey Makers Pty Ltd	Tram public transport in Melbourne	

Section 2 | Structure of operations and supply chain of Transdev Australasia

Our operating model

Our teams that make our operations possible supporting the commutes of our passengers each and every day are broken down as follows:



Operational Teams

Our frontline staff consisting of drivers, operations managers, and other vital roles focused on delivering an ever-improving service to all of our passengers and on behalf of our clients.



Fleet & Assets Teams

Maintain our assets, including the condition of our vehicles and vessels to support a safe and secure experience for our customers.



Facilities Teams

Maintain our building assets including our depots, licenced facilities and shipyards.



Corporate Teams

Provide support to all primary teams and consist of IT, Legal, People and Culture, Communications, Finance, Network Planning, Safety & Assurance among other functions.

Our supply chains

We engage with a wide variety of suppliers from fleet procurement, spare parts, maintenance, cleaning, security services and more which in total consist of over approximately 2,800 different suppliers across Transdev and YJM.

- Around 357 of these supplier relationships exceed a spend value of \$200,000 (AUD) per annum; and
- Around 399 supplier relationships exceed a spend value of \$100,000 (AUD).

Majority of our suppliers are Australia and New Zealand based with some located in Europe (France, Germany, Ireland and London).

Sixty-seven (67) key procurement categories have been identified for Transdev, and nineteen (19) for YJM. Across our organisation, the key procurement categories are as shown in the table below:

Team/operational area		Key Procurement Categories	
Corporate		IT & telecommunications services	Marketing, communications & publishing
		IT equipment & software	Insurance, legal & financial services
		Collective living and catering area	Labour hire & recruitment
		Office supplies & furniture	Travel & company cars
		Consultancy	

Team/operational area		Key Procurement Categories	
Facilities		Infrastructure subcontracting or facility management	Waste management
		Utilities (including Electricity Supply)	Construction
		Security & CCTV	
Fleet/Assets		Spare parts	Batteries
		Repairs & maintenance subcontracting	Tyres
		Tools, hand tools, small equipment supplies	Diesel fuel & additives
		Bus, coach & vessel – purchases	Lubricants
Operations		Cleaning	Uniforms
		Cash transportation subcontracting	Safety equipment

Our emphasis on long-term strategic partnerships enables us to foster close relationships with our suppliers, which allows for transparency and collaboration on sustainability-related issues, including modern slavery and human rights.

Whilst we cannot directly control the actions of those within our supply chain, we aim to positively influence our suppliers by establishing and communicating our values and expectations to them including the requirement to act in an ethical, transparent and virtuous manner. At Transdev, we set these standards with the support of our Ethics and Compliance Management System (ECMS) made up of a suite of policies and processes, some of which are outlined on page 20 which also includes Transdev’s Supplier Charter.

Transdev’s Supplier Charter is a key document for all Transdev suppliers as it outlines the principles and commitments that we expect Transdev’s suppliers to comply with. This includes addressing and promoting ethical conduct, sustainability, quality standards and more. The document is publicly available on Transdev’s website and is communicated to suppliers during the Transdev on-boarding process. It is also referred to and linked in Transdev’s purchase order terms and conditions and contracts templates for the supply of goods and services. In accepting Transdev’s terms, suppliers commit themselves to take action and eliminate human rights related risks, and complying with possible audits.

Section 3 | Modern Slavery Risks

Operational structure risks

The modern slavery risk within our operational structure is considered low due to the following factors:

- Geographic Location:**
Our presence across Australia and New Zealand where the risk of modern slavery is inherently low.
- Compliance with Australian law and regulations:**
 - Transdev and YJM's compliance with the Act;
 - Transdev and YJM's compliance with local labour and workplace laws helps ensure that staff are working in safe conditions, receive appropriate remuneration and have the required rights to work in Australia and New Zealand.
 - Transdev and YJM's compliance with the Corporations Act 2001 (Cth) ensures that there are risk management systems in place and executive and board oversight over these risks.
 - Transdev and YJM's operational structure is characterised by a high degree of unionisation. Frontline employees working within or for Transdev and YJM are subject to enterprise agreements under which they are remunerated accordingly. All other employees including those in corporate teams, are subject to employment contracts subject to local National Employment Standards.
- Compliance with requirements from parent company and our ECMS:**
Our parent company is European based, and majority owned by the Rethmann Group, a large German family-owned holding company, and minority owned by Caisse des dépôts et consignations, a French government owned financial institution. Transdev Group is headquartered in Paris, France therefore, we are subject to stringent regulatory and compliance requirements (this means that Transdev has policies and process in place which are based on and compliant with the Sapin 2 Law and the Duty of Vigilance). The requirements and obligations under these French laws go beyond the expectations imposed on a private entity under local law and regulations. Transdev's ECMS is highly influenced by Transdev Group ensuring that Transdev sets aligned policies and processes to the extent that they comply with local legislation.
- Local supply chain:**
Given the nature of the services that we deliver, most of our direct suppliers are based in Australia and New Zealand.

Risk assessment

Sustainable Procurement Action Plan

In 2020, Transdev established a Sustainable Procurement Project team, including members from Procurement, CSR, People and Culture and Safety and Assurance Functions. This project team worked with reputable external experts to complete a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable Procurement, and a risk and opportunity analysis of Transdev's supply chain. Through a series of internal stakeholder interviews and risk workshops, Transdev reviewed 46 of its supplier categories and mapped risks and opportunities covering Transdev's six key focus areas of sustainable procurement highlighted below:

**Human Rights**
Includes modern slavery, child labour, labour standards, working conditions, freedom of association, inequality.

**Health & Safety**
Includes physical injury, illness, impairment, mental well-being, fatalities.

**Diversity, Inclusion & Community**
Includes gender, aboriginal participation, long-term unemployed, social enterprises.

**Fair Practices**
Includes crime, bribery and corruption, ethical business operations.

**Environmental Opportunities:**
Includes carbon emissions, water, energy, waste, materials, recycling.

**Environmental Risks**
Includes contamination and leakages, hazardous materials, biodiversity, weather event and climate change resilience.

Transdev and YJM have not identified any specific instance of modern slavery in its operations and do not actively cause or contribute to modern slavery. However, we recognise that modern slavery risks do exist and may arise in our operations or supply chains. As it's difficult to have total oversight of our suppliers' actions particularly their indirect supply chains, through processes such as communicating Transdev's Supplier Charter Transdev ensures that its suppliers and their suppliers are aware of Transdev's expectations and requirements including those relating to human rights compliance.

Using the categories and results from the 2020 SPAP, in 2024, Transdev commenced the creation and implementation of a Modern Slavery Risk Assessment on industries that are susceptible to a higher risk of modern slavery. These industries include:

**Cleaning**

**Security**

**Uniforms**

**Spare parts**

**Bus manufacturing**

**Diesel & fuel suppliers**

Transdev engaged with its top 30 key suppliers which were selected based on Transdev's 2024 spend with the supplier, and suppliers from the high-risk industries outlined above. The selected suppliers were asked to complete a Modern Slavery Questionnaire outlining measures the supplier takes to prevent and manage modern slavery risks including their internal policies and key awareness actions within their organisation and supply chains. The review of supplier responses and policies was carried

out in 2025 and the results of the assessment are summarised below:

- 6 suppliers were marked as having a low modern slavery risk
- 16 suppliers were marked as having a medium modern slavery risk predominantly due to the complexity of their businesses and supply chains.
- 6 suppliers were deemed high due to the following conclusions drawn:
 - no responses or insufficient information provided by the supplier;
 - no publicly available information; and
 - no comprehensive due diligence measures in place to prevent the risk of modern slavery.

Some of these suppliers in the medium risk category were and are subject to audits as part of Transdev's Supplier Audit Programme ensuring that Transdev continues to take active steps to monitor modern slavery risks and supplier progress.

Supplier Audit Programme

In 2025, Transdev commenced audits on Transdev's three (3) high spend suppliers against following categories:

- Health, Safety, Environment and Quality (HSEQ); and
- Corporate Social Responsibility (CSR).

As part of the audit, Transdev reached out to and liaised with the selected suppliers to understand their policies, processes and procedures in relation to their approach to HSEQ and CSR compliance which also included a review of the suppliers' human rights and modern slavery practices. In 2026, Transdev aims to finalise the Supplier Audit Programme by undertaking audits on its final selected suppliers.

YJM Fair Supply Tool

In 2025, YJM adopted and rolled out the FairSupply tool which is a cloud-based environmental, social and governance (ESG) risk intelligence platform that helps identify, manage, and mitigate supply chain risks. It automates the analysis of complex, multi-tier supply chains to detect modern slavery, Scope 1, 2, and 3 carbon emissions, and biodiversity impacts.



Our approach

At Transdev, several measures are in place to alleviate and manage the risks and responses to human rights and modern slavery within the organisation which are also applicable to our stakeholders and suppliers.

Ethics and Compliance Management System (ECMS)

In Australia, Transdev complies with, and models our management system and processes in line with the Transdev Group ECMS. As mentioned earlier in this Statement, the ECMS is modeled based on European legislative regulations and requirements and covers a wide range of topics including human rights, transparency, anti-corruption and more. Most of the Transdev entities in Australia and New Zealand implement the ECMS and are also subject to internal reporting and performance monitoring processes to test the effectiveness of the system.

Internal Policies

We have a zero-tolerance approach towards modern slavery and human rights violations, a notion which is supported and outlined in our key policies and Transdev’s compliance with the ECMS. Transdev’s key policies and how they support our zero-tolerance approach are outlined below:

Code of Conduct

Sets out the expectations of Transdev employees, partners, contractors and suppliers including but not limited to treating others with fairness, equity and respect.

Group Code of Ethics

Sets out Transdev’s key ethical principles including ‘Compliance’ which involves adherence to applicable laws and regulations, and ‘Diversity’ whereby it rejects all forms of discrimination. The Code also outlines an avenue for reporting grievances.

The Anti-Corruption, Money Laundering and Financing Terrorism (ACMF) Code

provides guidelines, rules and principles associated with preventing corruption within a business:

- Gifts and invitations
- Sponsorship, Corporate Philanthropic, Non-profit Organisations and Charities
- Intermediaries
- Political Contributions
- Facilitating Payments
- Influence Peddling
- Collusion
- Recruitment and other HR Advantages
- Business relationships

Transdev Australasia Conflicts of Interest Policy:

Communicates that conflict-of-interest situations must be reported and managed appropriately, and provides guidance on how Transdev employees should handle these situations if, and when they arise.

Transdev Australasia Human Rights Policy:

Details clear commitments to respecting, protecting and promoting fundamental rights and freedoms, and how this should be done in a daily business context. The policy covers several topics including:

- acceptable working conditions and hours
- fair treatment (no harassment, privacy protection, no discrimination)
- freedom of association; and
- free and adult labour.

Transdev Australasia Whistleblowing Protection Policy:

Transdev has implemented the anonymous reporting platform ‘SpeakUp’ and encourages staff and other stakeholders including suppliers to report alleged and/or actual unethical, illegal, and improper conduct within the business including those related to human rights and modern slavery, in a safe and confidential manner, without the fear of retaliation.

YJM Whistleblowing Policy:

Encourages staff and stakeholders to report alleged or actual wrongdoing through various available channels including the anonymous whistleblowing system called ‘Whispli.’

Transdev Australasia International Sanctions and Debarments Policy

Outlines the policy on business dealings with sanctioned parties which prohibits business dealings with those individuals and bodies that are listed on the Australian consolidated list or those that are on the United Nations Security Councils consolidated list, and subject to sanctions

Tender questionnaires during selection process

Transdev’s tender process also requires prospective suppliers to acknowledge and confirm that they comply with the Act.

Supplier Charter

Transdev’s Supplier Charter outlines the standard expected from its suppliers ensuring they are compliant with local laws, regulations and Transdev’s ECMS and policies. We expect of all new and onboarding suppliers to commit to the charter including all clauses within it.

Our Contracts:

- **Model clauses:** Our contracts contain model clauses which have been prepared in line with generally accepted market standards and main regulatory contracts relating to ethics and compliance matter (e.g., UKBA, FCPA, Sapin II). They are designed to remind our counterparty of the values and principles to which we adhere and are means of obtaining representations from the counterparty that they have not/will not commit an ethics and compliance breach with the purpose of the contract at stake. These clauses also allow us to impose remediation measures on the counterparty or effectively terminate the contract in the event of a reasonable suspicion of breach with the clause, including a human rights violation.

- **Audit clauses:** Our contracts also ensure that we have the right to audit suppliers which includes undertaking an ethics and compliance audit.

Know Your Counterparty (KYC) Checks

As part of the supplier onboarding process, at Transdev a screening of prospective suppliers is conducted, which includes an ethics assessment on high-risk suppliers prior to entering into a contractual agreement with them. A KYC Check is performed to ensure that the counterpart can perform its mission and deliver the goods or services procured, is compliant with law and regulations, is financially reliable and ethically aligned to Transdev. As part of Transdev's internal policy, Transdev is required to monitor suppliers by updating the KYC Checks at least every 3-years to ensure that the supplier is still an appropriate counterparty to Transdev.

Human Rights Questionnaire

Annually, and for selected business development projects, Transdev undertakes a human rights risk assessment which includes considering whether necessary measures have been taken to prevent modern slavery practices such as child and forced labour.

Case Study: Must Know May

In 2025, the Transdev Ethics and Compliance team ran an awareness campaign throughout the entire month of May, whereby each Friday afternoon an information training session via Microsoft teams was delivered covering key policies and employee obligations under those policies which included the following topics:

Week 1: Ethics and Compliance & Gifts and Invitations

Week 2: Human Rights and Modern Slavery

Week 3: Conflicts of Interest & Whistleblowing

Week 4: Privacy

A couple days prior to the relevant session, a bulletin was shared with invitees outlining and summarising the topic that would be covered in the upcoming session.

The invitees/attendees included staff throughout Transdev Australia and New Zealand, including the Transdev Executive team, corporate offices and those from our operating businesses.





ECMS Working Group

Transdev’s Ethics and Compliance Management System (‘ECMS’) Working Group consists of members from the legal, finance, ethics and compliance, people and culture and IT departments. The Transdev ECMS Working Group meets quarterly to discuss the effectiveness of the ethics and compliance framework and imposes actions to improve the ECMS and Transdev’s compliance with laws and regulations including modern slavery. The ECMS Working Group:

- Allows for engagement and feedback between function on ethics and compliance;
- Tracking the impact of actions to improve ethical purchasing;
- Discuss ethics training developments and deployment; and
- Consider improvements requirements to our ECMS.

YJM Modern Slavery Monthly Meetings

As reported in the previous year’s Statement, 2024 was a big year for Yarra Journey Makers Pty Ltd (YJM) (a joint venture 51% owned by Transdev and 49% owned by John Holland) as it commenced operating the iconic Melbourne tram network, Yarra Trams from 1 December 2024.

As part of YJM’s governance, YJM have developed and implemented a Modern Slavery Risk Management Plan which outlines YJM’s objectives in relation to taking active steps to address modern slavery risks and mitigation measures. YJM refer to and list a number of initiatives and processes in the Plan for implementation.

During 2025, YJM and Transdev personnel worked collaboratively to strengthen modern slavery risk management with the sharing of procedures and processes to support the implementation of these practices within YJM. This collaboration has led to the establishment of regular monthly meetings between TDA and YJM to discuss broader modern slavery risk management initiatives.

Remediation

Transdev and YJM value input and feedback on issues from all stakeholders. Our culture of minimising risks and taking responsibility allows us to take a proactive stance on remediation.

The Transdev Australasia Whistleblower Policy (which is publicly available) and YJM’s Whistleblower Policy applies to all employees and external stakeholders. Through these policies, we encourage individuals to voice their concerns including modern slavery related issues without fear of retaliation through the process outlined in the Policy including anonymously via Transdev’s Whistleblower Platform ‘SpeakUp’ and YJM’s Whistleblower Platform ‘Whispli’

Entity	Whistleblower Platform	Country	Org code	Phone	Web link
Transdev	SpeakUp	Australia	127993	+61 2 8284 6262	transdev.speakup.report/speakup
Transdev	SpeakUp	New Zealand	127993	+64 9 913 5892	transdev.speakup.report/speakup
YJM/Yarra Trams	Whispli	Australia	N/A	N/A	yarra-trams.whispli.com/speak-up?locale

Section 4 | Measuring our performance and effectiveness

Monitoring Performance

The below KPIs have been used to assess Transdev Australasia’s effectiveness in the approach to mitigating Modern Slavery

Action	Progress
Ethics & compliance working group	Meeting frequency: Quarterly
	Meetings held: 4 (one per quarter)
Training	0 contract managers
	66% of procurement team
	All contract managers and procurement team members were invited to attend and provided with a human rights and modern slavery bulletin outlining key risk industries and measures in place at Transdev to support a culture of compliance and modern slavery prevention
Modern Slavery Instances	96% of Top Managers and Top Executives have completed the anti-corruption e-learning whilst 31% of other Managers have completed the anti-corruption e-learning during the 2025 year.
	Instances Detected: Nil (0)
	Instances Remedied (and how): Nil (0)

Progress against Transdev’s 2025 Modern Slavery Objectives

2025 Objectives	Progress
Review of some of Transdev’s key policies, ensuring that they protect human rights adequately and address modern slavery risks.	During 2025 an initiative was undertaken to implement new and update existing Transdev ethics related policies and processes. Part of this project, a local version of the Human Rights policy specific to Australia and New Zealand was created and implemented.
Implementation and commencement of high-risk supplier audit program which will address broader ethics and compliance topics.	In 2025, Transdev commenced audits on its high-spend suppliers. The audit considered HSEQ and CSR practices and initiatives within the supplier’s organisation and business dealings including those related to compliance with human rights and modern slavery requirements. For those suppliers where gaps were identified, Transdev met with them and highlighted key areas for improvement which the suppliers took on notice and which will be reported on by the supplier to Transdev.

2025 Objectives	Progress
Completing Transdev’s modern slavery risk assessment and understanding the modern slavery risk within the supply chain.	In 2025, Transdev conducted a risk assessment on its top 30 suppliers (including those from industries prone to modern slavery risks). The results identified suppliers mostly from the following industries with the larger risk of modern slavery: • Cleaning; • Spare parts; • Uniform; and • Security.
Development of a modern slavery e-learning program for employees that transact with suppliers/stakeholders (contract managers and procurement team).	In 2025, a training campaign was delivered to all staff including contract managers and the procurement team around human rights and modern slavery risks.
Deliver annual training to operational staff on the Ethics and Compliance Management System, and our policies.	
Consider any feedback received on modern slavery issues and implementation of opportunities to enhance compliance.	As a result of the supplier modern slavery risk assessment and supplier audit program undertaken during the 2025, these initiatives have helped Transdev consider the processes and policies in place within the supplier’s organisation and the areas for improvement. Additionally, in 2025 Transdev introduced the requirement to undertake and conduct annual human rights risk assessments which also incorporates modern slavery related topics. This questionnaire is also to be completed as part of any large-scale projects undertaken by Transdev.
Communication campaign informing employees about the availability of the enhanced Whistleblower Platform	In 2025, the Transdev whistleblower system ‘SpeakUp’ was upgraded and an awareness campaign was undertaken to inform employees of the availability of the system. New posters were prepared for Transdev office spaces, depots and other facilities, details were updated on Transdev’s intranet, communication through the company newsletter and the company mobile app. Further to the above, in May 2025 a training session was delivered to Transdev employees on the key requirements under Transdev’s Whistleblower Policy and the avenues for reporting wrongdoing including the ‘SpeakUp’ whistleblower system.

Progress against YJM’s 2025 Modern Slavery Objectives

2025 Objectives	Progress
Commence the implementation of an ECMS across Yarra Journey Makers Pty Ltd to align policies for consistency in approach and processes.	In 2025, a gap analysis was undertaken on some of the key policies in place at YJM to help identify the extent of alignment and gaps in relation to some of the policies and process at YJM. This initiative will fall part of a wider project to review additional policies and process during the 2026 year to assist with the implementation of an ethics and compliance management system at YJM.
Commence implementation of the initiatives outlined in the Yarra Trams Modern Slavery Risk Management Plan.	YJM have established a Modern Slavery Working Group, and maintain an action tracker to track progress on the Modern Slavery Risk Management Plan.
Yarra Journey Makers to deliver a modern slavery lunch and learn session informing staff about the topic, the risks involved and how to identify them.	Briefing of Procurement staff undertaken for modern slavery risks. For all other staff the briefing has been scheduled for the second half of 2026.



Section 5 | What's Next

Transdev actions:

In 2026, Transdev intends to take the following actions to support the prevention and management of modern slavery risks:

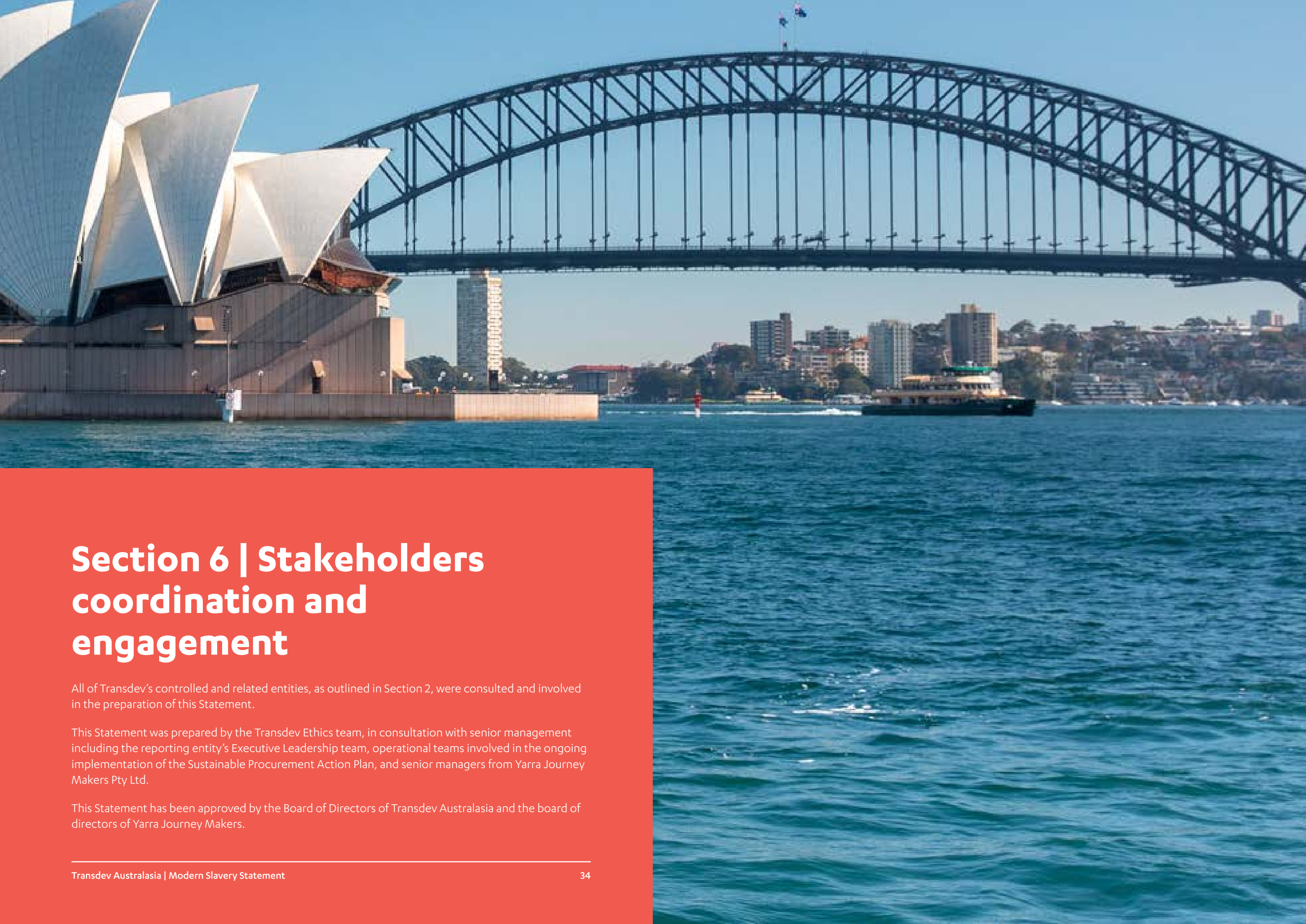
- Undertaking periodic reviews and assessments of suppliers who are more prone to modern slavery risks based on the results of the Modern Slavery Risk Assessment;
- Follow up on the 'opportunities for improvement' for those suppliers where gaps were identified part of the supplier HSEQ and CSR audit programme undertaken;
- Foster staff awareness of human rights and modern slavery risks by delivering our annual training on key ethics topics; and
- Encouraging reporting on modern slavery issues or concerns through our SpeakUp whistleblower platform.

Yarra Journey Makers actions:

In 2026, Yarra Journey Makers intends to take the following actions to support the prevention and management of modern slavery risks:

- Refreshing the procurement policy which also focuses on ethical supply chain and procurement governance to improve transparency of the supply chain and risks.
- YJM will be employing a new role within procurement which will include the governance of ethical supply chain practices.





Section 6 | Stakeholders coordination and engagement

All of Transdev’s controlled and related entities, as outlined in Section 2, were consulted and involved in the preparation of this Statement.

This Statement was prepared by the Transdev Ethics team, in consultation with senior management including the reporting entity’s Executive Leadership team, operational teams involved in the ongoing implementation of the Sustainable Procurement Action Plan, and senior managers from Yarra Journey Makers Pty Ltd.

This Statement has been approved by the Board of Directors of Transdev Australasia and the board of directors of Yarra Journey Makers.

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