

# NorthWestern Roads Group Modern Slavery Statement





## /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 2022 to 30 June 2023 (Reporting Period or FY23) 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 with entities

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.**

# /02 Our FY23 Key Actions



## Risk Assessment

Conducted spend analysis to enhance risk assessment processes



## Engagement

Continued to include modern slavery clauses in new contracts with suppliers



## Governance

Established an internal working group to coordinate modern slavery risk management



## Collaboration

Maintained collaborative relationships with key suppliers to understand their approach to modern slavery



## Effectiveness

Included a project-specific modern slavery management plan requirement for a large civil infrastructure project



### Chair's Foreword

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

NWRG acknowledges the United Nations Guiding Principles on Business and Human Rights and works to align our procurement practices with the International Guidelines for Sustainable Procurement (ISO20400).

NWRG is committed to identifying and addressing risks or impacts of modern slavery in our operations and supply chains and actively works to understand how our key suppliers are fulfilling their obligations. As part of this, NWRG maintains a modern slavery risk register across its operations and this year established a Modern Slavery Working Group to coordinate modern slavery risk management across our business.

#### **Penny Graham**

Chair of NorthWestern Roads Group



# NWRG acknowledges the principles and objectives of the Modern Slavery Act and is dedicated to identifying and mitigating potential modern slavery risks within our operations and supply chains.

In this Statement we provide an overview of our modern slavery risk management strategies during the Reporting Period, along with updates reflecting the evolution of these strategies.

NWRG has established a foundation for modern slavery risk management, as outlined in our Sustainability Policy, which has been approved by our Board of Directors. We are committed to continuously improving our ability to identify modern slavery risks and enhance our reporting procedures. Through direct engagement with our key suppliers, we monitor whether their practices meet our expectations to assess and address modern slavery risks, ensuring transparency and accountability in our supply chain. Additionally, we maintain a dedicated modern slavery risk register to address the risk of modern slavery within our operations.

We acknowledge that modern slavery risk management is an ongoing process that requires adaptability to changing trends in our business operations and to emerging risk areas. NWRG remains committed to managing modern slavery risks within our operations and supply chain in a responsible fashion. We appreciate this opportunity to recognise how our approaches have been improved upon in the past year.





# /03 Structure, Operations and Supply Chain

## About NWRG

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).

NWRG's registered office is in Eastern Creek, NSW 2766. Its responsibilities involve 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 north-west of Sydney.

For detailed information about each motorway, please visit [www.WestlinkM7.com.au](http://www.WestlinkM7.com.au) and [www.Northconnex.com.au](http://www.Northconnex.com.au).

NWRG does not directly employ its workforce but instead operates through a Management Services Agreement with NorthWestern Roads Management Services Company (referred to as NWR). Under this arrangement, NWR's skilled professionals and managerial staff provide their services to support NWRG's operations. The team at NWR comprises a small but dedicated group of employees.

Permanent employees

46%

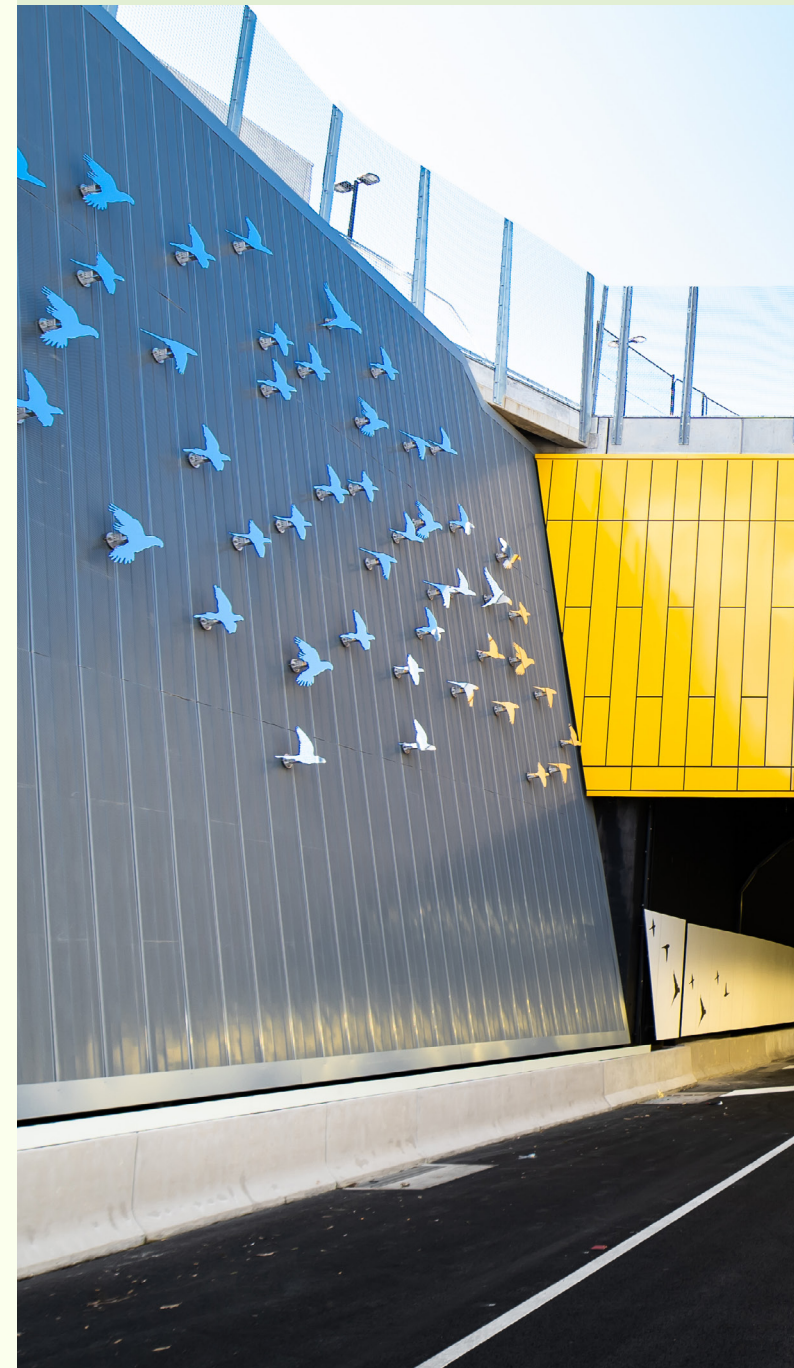
Contractors (indirect labour)

52%

Casual employees

2%

Table 1. NWR Staff Profile (As at June 30, 2023)



NWR has less than 50 staff and all NWR staff are based in Australia. These team members play a pivotal role in managing the two toll roads on behalf of NWRG, overseeing various aspects of the operation, including contract administration, financial management, risk management, technology, safety, and environmental management. Additionally, NWR employees are responsible for managing contractors who execute essential operations and maintenance services for the Westlink Motorway and NorthConnex Tunnel.

These operations and maintenance activities encompass:

- Civil, electrical, and control system maintenance;
- Operation of motorway control rooms;
- Landscape maintenance;
- Motorway incident response.



NorthWestern Roads Group Pty Ltd ACN 169 328 330  
NorthWestern Roads Group Nominees Pty Ltd as trustee for the NorthWestern Roads Group Trust ACN 169 328 287

### Shareholders



### Assets & Supply Chain



Westlink Motorway Group  
ACN 102 757 924



NorthConnex Company Pty Ltd  
ACN 602 719 513

### Key Supply Chain Partners

Operations & Maintenance  
Tolling & Operational technology

Figure 1. NWRG Group Structure



## Supply Chain

NWRG requires a resilient and dependable supply chain and achieves this through strong relationships with the small number of Tier 1 suppliers who provide the majority of our service and material inputs. These established partners, many of whom are large ASX-listed companies, are predominantly the same suppliers as reported in our FY22 Modern Slavery Statement.

During the Reporting Period NWR conducted an analysis of our expenditure by supplier type for the NorthWestern Roads Group. This is summarised below.



Supply Chain Category	Percentage of Overall Expenditure
Operations and maintenance services	78%
Professional services	7%
Legal services	2%
Technology services	2%
Other miscellaneous services and materials	11%

Table 2. Supply Chain Overview by Spend

## Operations & maintenance services:

- Road operations, maintenance and incident response;
- Tolling and Customer Management Services;
- Roadside Tolling Equipment and Services Contractors;
- Operational Management and Control Systems (OMCS) providers\*

The operations and maintenance services outlined are provided by four Australian-based providers with whom NWR has a high degree of engagement (two of whom have actively contributed to the drafting of this Statement).

## Remaining NWRG supply chain:

- **Professional services**
  - Engineering, environmental and project advisory services;
  - All 8 are Australian-based;
- **Legal services**
  - Three Australian-based legal services;
- **Technology services**
  - Information technology and cyber security services;
  - All 4 are Australian-based;
- **Other miscellaneous services and materials**
  - Human resources advisory;
  - Professional member services;
  - Minor office equipment, catering and merchandise.

In 2023, we entered into the M7-M12 Integration Project contract with a Tier 1 Australian-based construction company to widen the M7 Motorway and construct a connection to the new M12 Motorway. Specific contractual clauses addressing modern slavery were included in the contract. The construction company itself reports under the Modern Slavery Act.

\* The contract was transitioning during the Reporting Period (the current provider reports separately under the Modern Slavery Act and the new provider's organisation is based in Spain).



# /04 Understanding our Risks



## Risk Assessment

In 2020, NWRG engaged a specialist consultancy company with expertise in mapping human rights risks to assist with assessing and documenting our supply chain human rights risks, including modern slavery.

### Our risk assessment was conducted by:

- Mapping key products and services across NWRG supply chains;
- Designing a supply chain risk assessment methodology in line with AS ISO 20400:2018 Sustainable Procurement Guidance and the UN Guiding Principles on Business and Human Rights;
- Undertaking preliminary research and assigning a draft risk scoring for each product/service in scope; and
- Conducting a workshop to assess modern slavery risks across these products and services, involving key staff from across functional areas including operations, technology, finance, risk and safety.

The assessment weighed risks associated with the country or region from which the goods or services were sourced, risks associated with the industry in question, and risks associated with a particular buyer or supplier.



On the basis of the risk assessment, we prepared a **human rights “heat map”** to identify the levels of risk in NWRG’s supply chains. This risk assessment is updated annually to assess any material change in NWRG’s risk profile. There were no changes to the “heat map” reviewed in the Reporting Period due to the stable supply chain for NWRG.

Since, as discussed above, NWR employs a small number of professional employees in Australia, an internal assessment was made that the direct risk of modern slavery within NWR’s own operations is very low. This is based on NWR having well-documented and clear human resource controls. All employees are paid on or above award rates. For these reasons, our risk assessment processes are targeted to our supply chain activities.

## Priority Risk Areas

NWRG has identified five priority areas of modern slavery risk within our supply chain based on the heat maps described in the above section:

### Merchandise

Includes cotton apparel, which might be exposed to forced labour risks, noting that most cotton is produced in geographical regions exposed to higher modern slavery risks.

### Design & Construction

Where sourced materials, such as steel or cement, are imported there is a heightened risk this material may come from geographies with a higher risk of modern slavery.

### Tolling System Equipment

Electrical components with a disparate supply chain are known to have a pervasive modern slavery risk.

### Customer Care Services

Includes customer care services provided in geographical regions with higher prevalence of modern slavery risks.

### Operational Management & Control System

Electrical components with a disparate supply chain are known to have a pervasive modern slavery risk.



# /05 Addressing and Mitigating Risks

## Governance

NWR operates an internal **Modern Slavery Working Group** with representatives from across asset management, finance, technology and risk. The Modern Slavery Working Group coordinates assessment of NWRG's overall modern slavery risks and NWRG's engagement with key supply chain partners.

## How NWRG addresses its modern slavery risks through its governance arrangements:

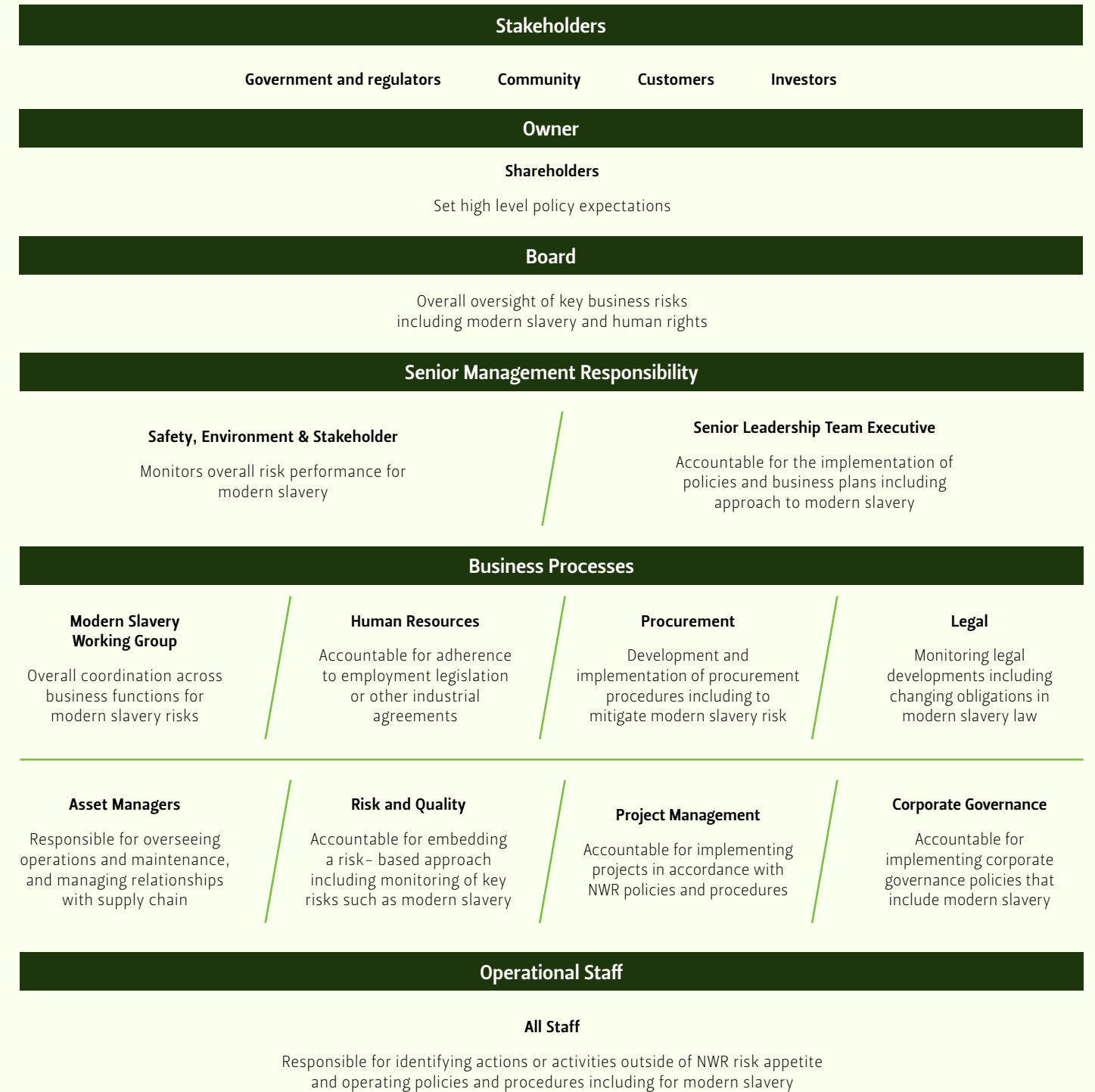


Table 3. Modern Slavery Governance Framework



## Policies

The following documents form the procedural framework for our management of modern slavery risks in our operations and supply chains.

Policy Tool	Relevance to our Anti-Modern Slavery Approaches
People Policy	Articulates the requirements for ensuring team members are legally permitted to work in our business, including compliance with relevant visa conditions.
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	Articulates how our purchasing decisions are to be made.
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 out our expectations and requirements of suppliers, including in relation to modern slavery and human rights.
Risk Policy	The policy outlines strategies and controls for mitigating and managing risks, including consideration of third party reputational and social risks.
Modern Slavery Risk Register	Specific risk register to manage NWRG's modern slavery risks. The register is used to identify actions to be taken to maintain or improve our risk profile.
NWR Whistleblower Policy	Provides a publicly accessible mechanism to report any breach of the law, such as criminal conduct, fraud or unethical behaviour against NWR's Code of Conduct through a specialist independent service.
NWR Supply Chain Modern Slavery Remediation Guideline	Outlines how NWRG would respond to, investigate and remediate reports of modern slavery identified in the NWRG supply chain.

Table 4. Policy Framework

## Capability and Awareness

All staff receive **annual refresher training** from the NWRG Safety, Environment and Stakeholder Manager. This training aims to remind staff of NWRG's key modern slavery risks, and overview of our approaches to address those risks. It also involves a discussion of contemporary issues that have arisen and that may relate to risk indicators to be mindful of.





# Project Level Approaches

## Case Study M7–M12 Integration Project

In this Reporting Period NWRG, through its Westlink M7 asset, entered into a contract to widen 23 km of the motorway and construct a new interchange with the planned M12 motorway.

This is a significant civil construction project and is being designed and constructed by a tier one construction company. Given the scale of the project and the depth of the supply chain, we required a project-specific modern slavery management plan from the contractor for this engagement. This is a significant shift for our team, and the first time we have required long-term commitments to manage modern slavery risks from our supplier across a project's life-cycle. We have worked with this construction company to specify an annual reporting regime for the life of the construction works to ensure our management of these risks throughout the contract's full life-cycle. If successful, we hope to use this as a model for future major projects.

## Supplier Engagement

**We recognise that management of modern slavery risks does not only happen at supplier selection.**

Leveraging our deep relationships with our consolidated supply base, NWRG actively engages with prioritised suppliers (based on both risk and spend) to understand their processes for addressing modern slavery risks in their operations and supply chains throughout our contract lifecycle.

While many of our key suppliers are reporting entities in their own right, we leverage our contract management meetings to explore how our key suppliers identify and address modern slavery risk beyond information that may be shared in their disclosures.

Engagement involves a mix of informal discussions and formal audit and assurance programs across a range of risks, including subcontractor and supply chain management.

## Grievance and Remediation

Integrity is one of our core values and is of high importance in supporting the confidence of our customers, suppliers, shareholders and employees. It is important that we are aware of any concerns relating to an actual or suspected violation of our policies, codes, health, safety and environmental obligations and other business integrity issues, including any suspected breach of human rights (including labour rights). We strongly encourage anyone who is aware of, has witnessed, or suspects any reportable conduct to report this immediately to our independent and confidential **Whistleblower Service**. All reports to this service will be investigated and treated seriously and will be kept confidential and secure as far as possible. The service is referred to as 'Fair Call' and can be contacted on 1800 500 965 and is available 24/7.



NWR maintains a **Supply Chain Modern Slavery Remediation Guideline**. The Guideline provides direction for NWR staff on how to report and respond to a potential modern slavery issue identified within NWRG's supply chain. The Guideline also outlines recommended steps on how NWR would respond to, investigate and remediate these issues. The Guideline provides clear direction on information collection, confidentiality and use of external resources, such as legal counsel, the use of an independent investigator and informing relevant authorities. It also outlines recommended approaches to managing issues that may involve child labour, debt bondage or forced labour.



# /06

## Measuring effectiveness

### FY23 goals and progress

The NorthWestern Roads Group 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.



Area	FY23 Goal	Progress
Governance	Maintenance of: <ul style="list-style-type: none"> <li>• Modern slavery risk register;</li> <li>• Sustainability Policy; and</li> <li>• Whistleblower Policy.</li> </ul>	Conducted an annual review of all three policies in relation to their modern slavery elements. Improved recognition of modern slavery identified to be included in Whistleblower Policy.
	Establish an NWRG Modern Slavery Working Group with responsibility for overall coordination across business functions for modern slavery risks.	Modern Slavery Working Group established. Group meets routinely and has enhanced overall coordination across NWR business functions.
	Conduct a spend analysis to gain a more detailed understanding of modern slavery risks in the NWRG supply chain.	Analysis conducted and will assist in our approaching modern slavery risks and targeting supplier collaboration in the next reporting period.
Due Diligence	Reviewing the FY22 modern slavery statements of our suppliers who are reporting entities under the Modern Slavery Act, to understand their assessment of their modern slavery risks, their approach to mitigating those risks, and the need to apply any relevant practices within NWRG.	Modern slavery statements of key suppliers reviewed. Approaches reviewed are in line with NWRG's expectations.
	Benchmarking of NWRG practices with industry peers.	Reviewed peer modern slavery statements. Sought insights from shareholder subject matter experts who have relevant industry experience. Conducted collaboration meetings with key suppliers who are also industry peers. Sought additional advice on reporting practices from third party experts.
	Monitor the approach of the new owner of the Operation and Maintenance provider for the Westlink M7 asset to addressing modern slavery risk.	Met with representatives of the new Operation and Maintenance provider parent entity and was provided details of the company's approach to modern slavery, including an overview of their own statement.
Grievance and Remediation	Report on any identified modern slavery events from our whistleblower hotline to our board.	No events were recorded in the current period.
	Making our remediation process visible and available.	Whistleblower process available on our websites and in our corporate offices.

Table 5. Summary of our FY23 goals and progress



# /07 Next Steps

## Risk Assessment

- ▶ Engage an external consultant to review NWRG's risk assessment approach against contemporary practice.

## Governance

- ▶ Finalise a review of our Whistleblower Policy to specifically identify modern slavery as reportable conduct.
- ▶ Conduct role-specific training for staff with responsibility for key modern slavery risks.

## Due Diligence

- ▶ Establish a collaborative forum with the contractor delivering the M7-M12 Integration Project for NWRG. Review the modern slavery reporting outputs required by the contractor.
- ▶ Standardise collaborative efforts with key tier one suppliers.
- ▶ Commence additional analysis of supply chain to examine category detail (e.g. greater understanding of material inputs).

## Grievance & Remediation

- ▶ Review grievance accessibility and identify if actions can be taken to ensure access to vulnerable workers in our supply chains.



## 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 6 December 2023.

*Penny Graham*

**Penny Graham**  
Chair of NorthWestern Roads Group