

Modern Slavery Statement FY25



Reporting Entities under the Modern Slavery Act 2018 (Cth) –

This Modern Slavery Statement (Statement) is published in accordance with the Modern Slavery Act 2018 (Cth) (Act). As was the case in the previous reporting periods, this is a joint statement by each of the Reporting Entities under the Act as listed in Appendix A (“Reporting Entities”). For the purposes of this Statement, unless otherwise indicated, ‘Transurban’, ‘we’, ‘us’ or ‘our’ refers to the Reporting Entities. The WestConnex Group, Sydney Transport Partners (STP) and NorthWestern Roads Group (in which Transurban holds an interest) will be lodging their own Modern Slavery Statements under the Act. The Transurban Sustainable Procurement Program (Program) has been deployed across the WestConnex Group (owned and controlled by STP) and is being managed by the Transurban-led procurement team. As a result, there is a substantial amount of overlap across each of these statements. Unless explicitly identified otherwise in this Statement, Transurban operates using group-wide policies and procedures to assess and address modern slavery risk.

Risk definition – Unless stated otherwise, all references to ‘risk’ within this Statement refer to modern slavery risks to people as per the United Nations Guiding Principles on Business and Human Rights (UNGPs). For more information on Transurban’s corporate and sustainability risks and responses see our [FY25 Corporate Report](#).

About this report

Modern slavery involves the exploitation of humans, and we recognise that Transurban and our suppliers have a responsibility to respect human rights, including freedom from all forms of abuse that make up modern slavery. We are committed to respecting all internationally recognised human rights, including modern slavery.

Our Modern Slavery Statement records the actions we've taken during the reporting period to improve our ability, where possible, to identify, assess, mitigate and manage modern slavery risks in our operations and supply chains. We acknowledge that our work in this regard is ongoing, and we continue to strengthen our controls and investigate further into our supply chains.

Modern slavery can exist in any country or industry, and include some of the most extreme human rights abuses. It can be embedded into many global challenges including growing populations, climate change, technological development, global trade, geopolitical issues and conflict.

The most vulnerable people around the world continue to be at risk of situations that could lead to modern slavery, particularly migrants, women and children.

This is our sixth Modern Slavery Statement, published in accordance with the *Modern Slavery Act 2018* (Cth).

While we did not detect or receive alerts about any actual or suspected modern slavery instances in our operations or supply chains over the reporting period, we recognise this does not mean that modern slavery was not present.

We also acknowledge that our roads are used by people who may be engaging in, or victims of, modern slavery activities. While we may not cause or contribute to these activities, we continue working to better identify potential instances of modern slavery on our roads and to improve the awareness and capabilities of teams monitoring our roads. See our [FY25 Corporate Report](#) for more information on our sustainability approach, activities and performance.

Our approach to mitigating our modern slavery risks during FY25 encompassed:

- **Improved due diligence and tracking.** For example, improving our evaluation tool used to monitor and assess suppliers and business partners controls to identify, assess and respond to modern slavery risks
- **Third-party advice.** For example, engaging an expert third-party to carry-out two semi-announced audits of offshore supplier call centre sites
- **Updated our policies and procedures.** For example our [Supplier Sustainability Code of Practice](#) and [Human Rights Policy](#)
- **In-house expertise.** For example, using in-house talent to develop and build a new bespoke e-learning module tailored to our operations and supply chains.

Program timeline

FY18 to FY21

- Transurban Sustainable Procurement Program established, aligned to ISO 20400:2017
- Joined the UN Global Compact Network Australia's Modern Slavery Community of Practice
- Partnered with the Infrastructure Sustainability Council (ISC) to establish the Modern Slavery Coalition
- Established a dedicated sustainable procurement leadership role
- Conducted modern slavery awareness training and workshops for our people and key suppliers
- Published our inaugural Modern Slavery Statement (FY20).

FY22 to FY24

- Piloted first responders training to identify and escalate potential or actual instances of modern slavery
- Embedded the use of our purpose-designed in-house supplier evaluation tool
- Piloted a bitumen supply-chain study to deepen our understanding of modern slavery risks
- Fast-tracked our supplier engagement on modern slavery by bringing digital labour rights and modern slavery triage actions forward in the onboarding process
- Delivered tailored modern slavery training to our traffic control room operators and incident response contractors.

FY25 key actions

- Updated our [Human Rights Policy](#) and [Supplier Sustainability Code of Practice](#)
- Extended our supplier evaluations to more than 300 suppliers within the past 24 months, including 179 suppliers with spend in FY25, covering more than 84% of total Transurban spend
- Increased our direct construction-material supplier engagement, including reviewing a desktop supply chain analysis of electronic tags and steel used in our supply chain
- Developed bespoke modern slavery e-learning for Transurban's workforce– specifically tailored to the operations and supply chains of our business
- Delivered tailored and interactive training to a specific incident response team in NSW, targeting key corridors where trafficking in persons could occur
- Co-chaired an industry coalition working to reduce modern slavery risks in infrastructure supply chains
- Conducted social and labour audit training for the Transurban Procurement team, supporting professional development and understanding into how audits can detect instances or indicators of human rights issues (including modern slavery)
- Engaged a third party to conduct semi-announced social and labour audits on two international supplier call centre sites (see case study, [page 18](#)).

Our structure and operations

Figure 1 – Structure and operations overview (as at 30 June 2025)

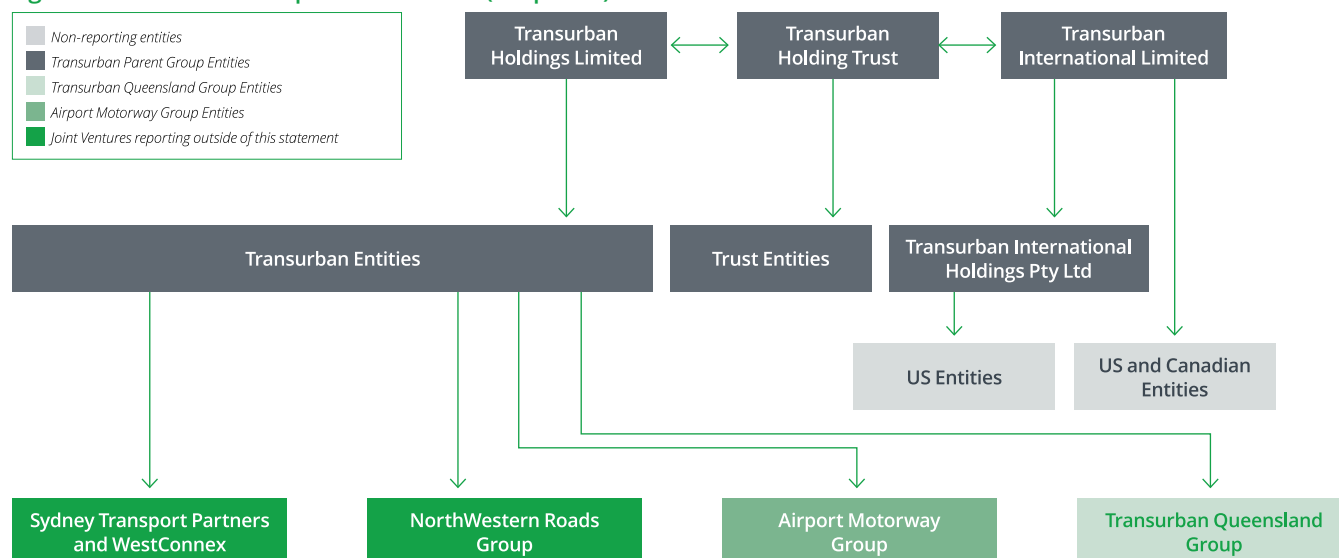
Market	Asset	Company	Ownership
Montréal, Canada One office site	A25	Transurban	50%
		La Caisse	50%
Greater Washington Area, US Two offices sites ¹	495 Express Lanes	Transurban	50%
	95 Express Lanes	AustralianSuper	25%
	395 Express Lanes	CPP Investments	15%
	Fredericksburg Extension	UniSuper	10%
	495 Express Lanes Northern Extension Project*		
	95 Express Lanes / Opiz Boulevard Ramp Project*		
Brisbane, Australia Three office sites, one depot and one incident response site	Gateway Motorway	Transurban	62.5%
	Logan Motorway	AustralianSuper	25%
	Clem7	Platinum Tawreed Investments	12.5%
	Go Between Bridge		
	Legacy Way		
	AirportLinkM7		
	Logan West Upgrade Project*		
Sydney, Australia 10 office sites and one depot	Inner City Bypass, Brisbane	Brisbane City Council	100%
	<i>Transurban manages operations, maintenance and incident response</i>		
	Toowoomba Bypass, South East Queensland	Department of Transport and Main Roads	100%
	<i>Transurban provides tolling services</i>		
	M5 West	Transurban	100%
	M2		
	Lane Cove Tunnel		
	Cross City Tunnel		
	Eastern Distributor	Transurban	75.1%
		IFM Investors	14.37%
		UniSuper	10.53%
	M7	Transurban	50%
	M7-M12 Interchange Project*	CPP Investments	25%
		QIC Limited	25%
	WestConnex	Transurban	50%
	M8	AustralianSuper	20.5%
	M4	CPP Investments	10.5%
	M5 East	La Caisse	10%
	M4-M8 Link	Platinum Tawreed Investments	9%
Melbourne, Australia Five office sites	Rozelle Interchange		
	NorthConnex	Transurban	50%
		CPP Investments	25%
		QIC Limited	25%
	CityLink	Transurban	100%
	West Gate Tunnel Project*		

* under development or construction

¹ One additional office site is located in California

Our corporate structure

Figure 2 – Transurban corporate structure (simplified)



At the parent level, Transurban operates under a triple-stapled structure, where each stapled security is quoted and traded as a single security on the ASX. Each stapled security is comprised of a share in Transurban Holdings Limited (THL), a share in Transurban International Limited (TIL), and a unit in Transurban Holding Trust (THT).

Each of these entities is overseen by its respective Board of Directors: THL Board, TIL Board and, the Board of Transurban Infrastructure Management Limited (TIML) as the responsible entity of THT. These boards have common Directors and meet concurrently. Unless otherwise indicated, in this Statement, the three boards are collectively referred to as the Board.

Controlled entities within the Transurban Group include corporate entities domiciled and incorporated in Australia, the United States (US) and Canada.

Statement coverage

This Statement covers the Reporting Entities in Appendix A. For the purposes of this Statement, the Reporting Entities have been separated into the three corporate groups, namely, the Transurban Parent Group, Transurban Queensland Group, and Airport Motorway Group, as defined in Appendix A and as follows:

- **Transurban Parent Group:** 'Transurban Parent Group' refers to the stapled entities THL, TIL, TIML as the responsible entity of THT, and the subsidiaries identified as Transurban Parent Group members in Appendix A. Transurban Parent Group, under the entity TIL, also owns and controls entities in the US and Canada.
- **Transurban Queensland Group:** Transurban Queensland Group forms part of the wider Transurban corporate group and operates toll roads in Queensland, Australia. Transurban Queensland Group is owned by a consortium comprising Transurban (62.5%), AustralianSuper (25%) and Platinum Tawreed Investments, a wholly owned subsidiary of the Abu Dhabi Investment Authority (12.5%).
- **Airport Motorway Group:** Airport Motorway Group includes Airport Motorway Pty Limited, the owner and operator of the Eastern Distributor Motorway in Sydney. Airport Motorway Group is a joint venture between Transurban (75.1%), IFM Investors (14.37%) and UniSuper (10.53%).

Joint ventures

As shown in our structure and operations overview (Figure 1) and our simplified corporate structure (Figure 2), Transurban holds non-controlling equity investments in non-operated joint ventures in Australia, Canada and the US. In some cases, Transurban acts as the operator of road assets under contract to these entities. Where Transurban operates road assets, information is included within this Statement unless otherwise noted.

External lending and investing activities

Transurban does not lend money to third parties. We do, however, have minority investments in non-core road operating assets.

More information

For more information on the Reporting Entities held by Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group entities, see Appendix A.

For more information on our operations, executive team and assets, see our [FY25 Corporate Report](#).

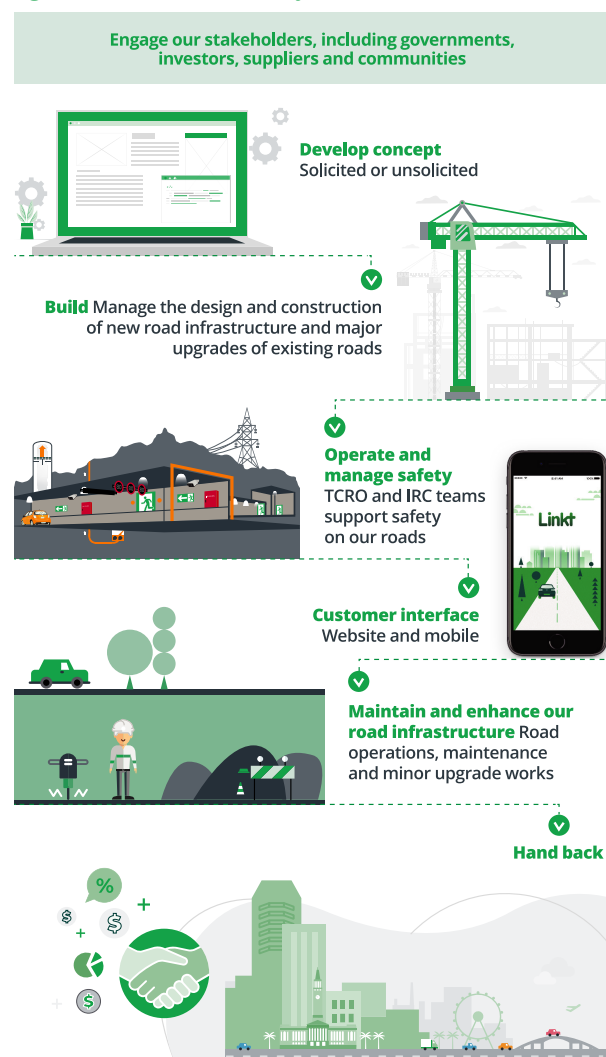
Our operations

Our operations¹ broadly involve working in partnership with governments, business partners, suppliers and other stakeholders to build and operate toll roads that benefit our customers and neighbouring communities. Our toll roads serve as key transport connections for people and freight in major cities and regions across Australia, the US and Canada.

A typical toll-road lifecycle is shown in Figure 3. As well as building new roads, we also acquire existing roads. We manage the operations and maintenance of our roads, including managing major upgrades over specified concession periods. The average concession period across our assets is 27.9 years. When a specified concession period ends, assets are handed back to the relevant government. We currently operate more than 360 kilometres of road infrastructure, including open roads, tunnels, bridges and ramps.

¹ In this Statement, 'operations' refers to actions undertaken by our direct workforce including employees and managed contingent workers. Suppliers and people engaged to provide support services that may interact with our operational teams (such as cleaning contractors) are included and referenced in our supply chain

Figure 3 – Road asset lifecycle overview



Transurban may also acquire concessions of existing road assets, or be engaged by governments to operate their owned assets under contract

Beyond building and maintaining road infrastructure, we also deliver parks, cycling and pedestrian paths, playgrounds, and public art. We work with contractors on projects to meet government regulations and procurement requirements.

Once a road is opened, we use advanced technology to operate and manage traffic efficiently and safely. Our traffic control rooms operate 24/7, supported by CCTV, road sensors, and AI-enabled alert systems. Incident Response Crews (IRC) also operate 24/7, ready to respond to incidents within minutes¹ and helping maintain safe and efficient operations while also supporting impacted customers.

For information on our major projects progress, see our [FY25 Corporate Report](#).

For information on our operational governance, policies and processes, see page 12.

Customer experiences

Our customers largely manage their toll accounts online or via mobile apps, where they can access information on toll pricing, trip costs and tolling points. Customers can receive notifications and view information such as road incidents, fuel and Co2 emissions savings and time travel savings on our Australian assets using Linkt's Trip Compare tool and the Linkt app. For more information on our Linkt app, see our [FY25 Corporate Report](#).

Figure 4 – Our retail and rewards brands

Australia	United States	Canada

Our people

Transurban's direct workforce² comprises more than 4,100 people across Australia and North America. Our people primarily work from our 25 corporate offices³ and site locations,⁴ as well as remotely. Job functions include: toll road operations and maintenance; major road project delivery; customer service; and head office functions (such as customer and technology; facilities; finance; health, safety and environment; legal; people and culture; procurement and risk).

Employment standards

In Australia, our employees are covered by industrial instruments including modern awards, enterprise agreements and individual employment contracts. These instruments meet or exceed minimum entitlements required for Australian employees under National Employment Standards.

In the US, employees are provided with clear information regarding their roles, working hours, salary and benefits and employment standards aligned with legal requirements where we operate.

Skilled workers

During FY25, our direct workforce included 203 people working under visa arrangements.⁵ Their direct employment means our visa-holder employees have the same entitlements as Transurban's domestic-resident employees, including training on our codes and policies, multiple avenues to access grievance channels as well as the ability to raise concerns anonymously.

For more information on our workforce, see our [FY25 Corporate Report](#) and [FY25 Sustainability Data Pack](#).

¹ In FY25, our median incident response time was 7.3 minutes (7 minutes and 18 seconds)

² As at 30 June 2025. Our direct workforce includes employees (including casual, fixed term and permanent employees and excluding leave of absence and non-executive directors), temporary workers and workers contracted through our partner organisations

³ Three Transurban sites are operationally managed by external organisations. Transurban employees may also operate from non-Transurban-managed sites, including on connected asset networks

⁴ Sites include depot locations that are not offices

⁵ Valid visa types (e.g. skilled migrant workers) with permission to work. Remaining direct employees have appropriate working rights through citizenship

Our supply chain¹

We have 22 assets in operation and three major projects expected to open by mid-2026. We partner with a diverse range of suppliers including global multinational construction contractors, international technology providers, consultants and local and social enterprises, with the majority located in the countries where we operate.

Our supply chains are complex networks of large, medium, and small businesses providing goods and services. Our annual managed spend is more than \$1.55 billion and we have more than 1,300 direct suppliers. Our procurement activities reflect the lifecycle of major road infrastructure projects, and include products and services relating to road design and construction, and to operations and maintenance.

91.8% Australia
99.7% countries where we operate

The industries, categories and suppliers we used to provide goods or services to support our operations remained consistent with previous years.

During the reporting period, major project construction work continued on the West Gate Tunnel Project, M7-M12 Integration Project and the 495 Express Lanes Northern Extension Project.

Across our major projects and operational supply chains, we used approximately 365 alternate suppliers³ this year compared with FY24, representing around 7% of our total spend. More than 220 of these suppliers were new to Transurban. New suppliers are reviewed prior to their onboarding, as noted in our due diligence section (page 15).

More than 99% of our FY25 spend was with suppliers with trading sites or headquarters in Australia, the US or Canada (Figure 5). Recognising labour risks may be greater upstream from our direct suppliers we have (so far) identified more than 500 Tier 2 suppliers⁴ – that is, businesses our direct suppliers have contracted with or have proposed to contract with when delivering goods or services to Transurban. We have used our supplier assessment tools to assess more than 30 of these identified Tier 2 suppliers so far, including reviewing their modern slavery risk controls and actions, and checking for potential vulnerable upstream labour.

Figure 5 – Tier 1² direct supplier spend by geography (FY25)

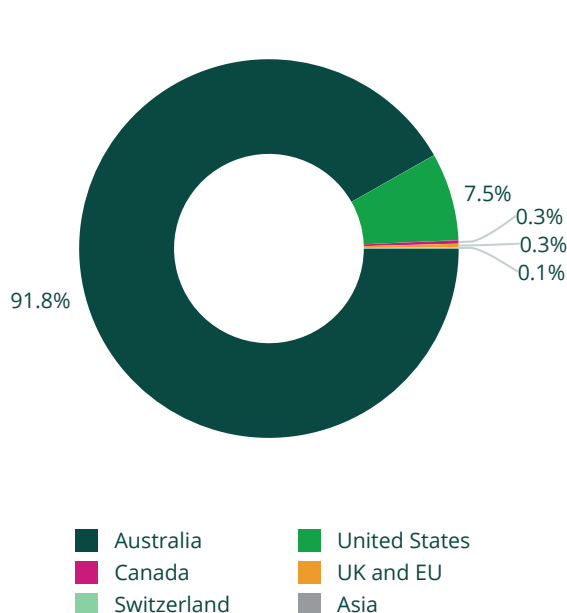
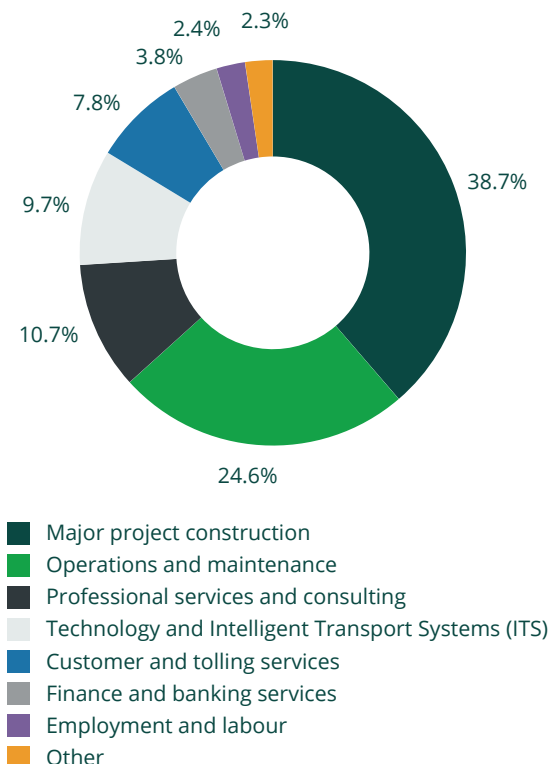


Figure 6 – Top managed spend by category (FY25)



¹ All data in this section excludes the WestConnex Group, which Transurban operates on their behalf

² Tier 1 suppliers are suppliers directly contracted by Transurban

³ Alternate suppliers include new suppliers and suppliers who were not used by Transurban in the immediate prior reporting year

⁴ Tier 2 suppliers are suppliers contracted to our Tier 1 suppliers, where Transurban does not have a direct contractual relationship

Our top FY25 supply chain categories (comprising more than 91% of our total spend) are listed below. See Figure 6 for a breakdown of spend per category.

Category	Activity	Suppliers	Typical activities
Major project construction	Designing and constructing new roads and delivering major upgrades to existing roads	- Selected design and construction suppliers - Supplier subcontractors	Heavy works: drilling; piling; excavation; tunnel boring Mechanical and electrical: wiring; lighting; pumps; jet fans; installing deluge, ventilation and ITS Management: project and engineering Labor: civil labour, traffic control, project management, qualified skilled labour Other: wire mesh; structural steel, shotcrete, precast and in-situ concreting; asphalt laying; painting
Operations and maintenance	Maintaining road safety and operating standards in line with contractual requirements	- Selected incident response and maintenance suppliers - Supplier subcontractors	Road-specific operations and maintenance activities: civil, mechanical and electrical works; landscaping maintenance and incident response services. - Road maintenance works may involve some of the construction activities described under 'Major project construction' above. - Suppliers may appoint subcontractors to deliver some activities.
Professional services and consulting	Delivering services to corporate management	Selected consultants	Desktop-based specialist services: legal support; strategy development; and general business and financial consulting.
Technology and ITS	Providing hardware, software and technical expertise	Selected technology suppliers	Information and communications technology: hardware; ITS hardware and software; road safety systems; technology consulting, maintenance; support; and software for our offices (including application licences) and operations (including mobile apps).
Customer and tolling services	Supporting our business and customers	Selected suppliers, consultants and technology providers	Customer products and services that support our operations: sales platforms; customer relationship management; call centre services; billing systems; video tolling services; electronic tags

Labour in our supply chains

We use both direct and indirect labour services. Indirect labour services are used for activities such as:

- Road maintenance services: for example, landscaping, electrical and mechanical trades, incident response services, traffic management, civil maintenance and machinery operators.
- Multi-year infrastructure construction delivery: for example, truck drivers, asphalt paving, civil contractor services and labourers.
- Skilled labour: for example, contingent workforce, professional services, technology and customer services, legal services, consultants and the skilled labour workforce used in our corporate supplier partners.

Indirect labour services also exist further upstream in our supply chains. For example, factory labourers manufacturing goods, materials or components; transport, shipping and logistics workers; and further labour is used in subcontractors through every tier of the supply chains.

Some labour services may include casual or migrant workers, with labour sometimes delivered in shifts, such as overnight cleaning, weekend construction works; or provided 24/7 such as incident response services. Road maintenance works are also often delivered overnight where critical infrastructure within our tunnels can be inspected, maintained and repaired to minimise road-user disruptions.

We continue to track potential labour risks and monitor those controls that suppliers have to protect and allow workers to enjoy their labour rights at work. Through the data collection and assessment tools we use, we identified that in FY25:

- 40 suppliers have disclosed workers on visa arrangements in their operations
- 7 suppliers hold labour-hire licences and 32 suppliers have identified that they use labour-hire in their operations or supply chains

- 13 suppliers demonstrated that they had collective bargaining agreements in place.

We acknowledge that on a global scale, Australia has been documented as having a lower prevalence of modern slavery. We continue to work with our industry partners and suppliers to elevate the awareness of labour risks in Australia and globally and work towards assessing the risks of modern slavery more critically. For more information, see collaboration and industry engagement (page 22)

Managing our supply chains

Centralised project, operations and procurement teams continue to manage Transurban's major project supply chains and operational procurement activities – unchanged from previous reporting years. Our policies, frameworks and procedures establish how we and our suppliers work together to minimise and manage risks, including how we assess and address modern slavery risks.

We do not tolerate serious breaches of our policies and procedures, where suppliers fail to commit to corrective actions within agreed timeframes. In such cases, we would seek to terminate the commercial relationship.

But we also do not walk away from suppliers facing genuine difficulties in achieving compliance with our policy and procedural requirements. We understand that in some situations the tasks can be challenging and our aim is to support suppliers so that difficulties can be addressed.

We continue to work to understand and investigate the complex layers of our supply chains to improve our effectiveness of assessing and addressing supply chain risks, including modern slavery risks to people. We continue to review, and strengthen where necessary, our policies and processes to reduce any potential involvement in causing or contributing to adverse impacts to people. For more information see our approach (page 12).

Case study

Identifying our supply chains beyond Tier 1

During FY25, we continued capturing and assessing information about our value chains, including the potential risks to people associated with goods and services. To date, we have identified and captured information from more than 500 Tier 2 suppliers as well as a small number of suppliers deeper in their supply chains.

We continue to improve our visibility of extended value chains to assist us in identifying the exposure countries and types of modern slavery existing in these categories and locations of supply. As a result, we are increasingly better equipped to recognise risks and instances of slavery further along our supply chains.

In the reporting period, we worked with key suppliers to trace specific areas and identify countries, key actors and factors involved in the supply of goods or services. These pilot exercises help us deep dive into specific areas and refine our modern slavery risk determinations associated with these supply chains.

In addition to identifying the countries, suppliers and processes in the supply chain journey, we also used product or certification information such as Environmental Product Declarations or Lifecycle Assessments to confirm the steps taken in the supply of these products or materials.

Figure 7 – Supply chain traceability example of steel used in a Victorian project

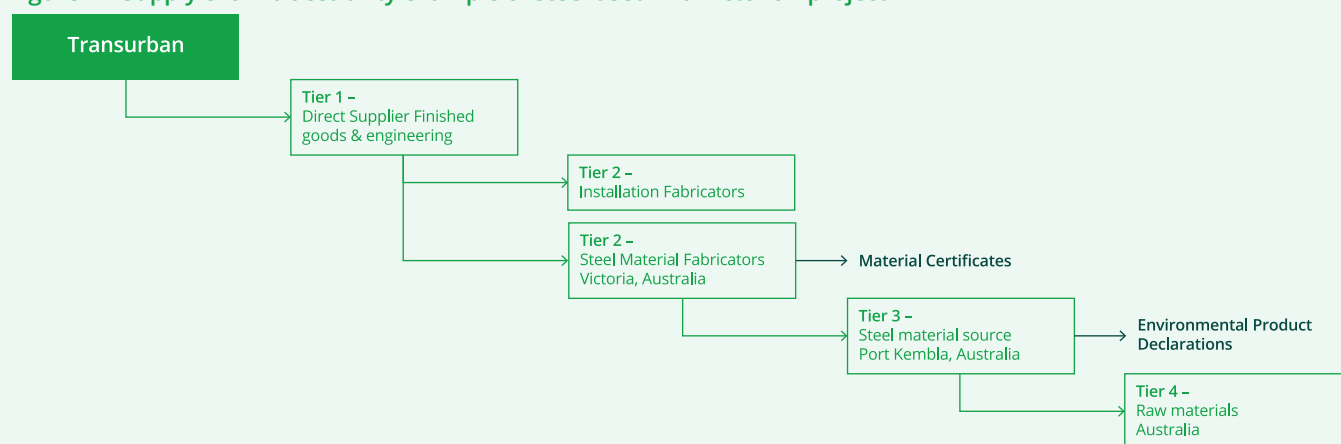
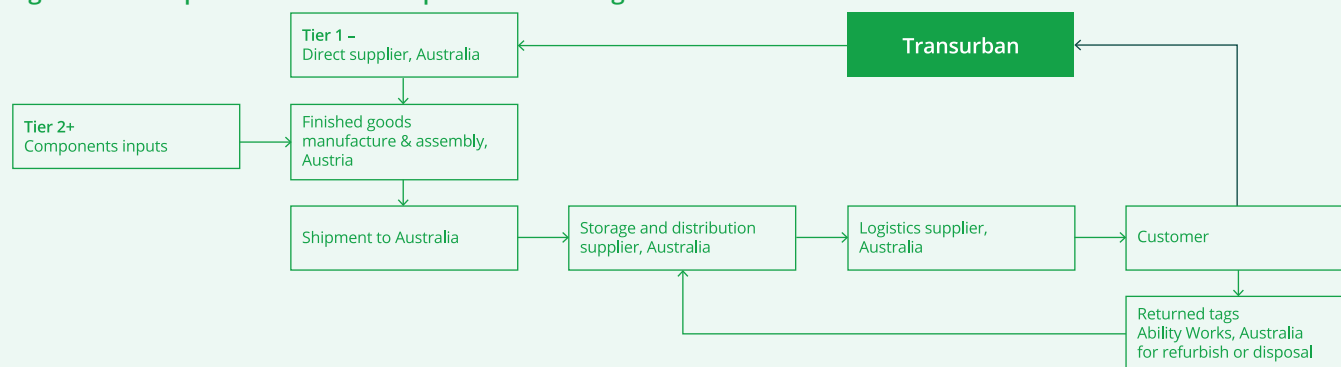


Figure 8 – Example of value chain map of electronic tags



Transurban entities without supply chains

Transurban's structure includes entities (for example, Reporting Entities) that do not engage with suppliers to purchase goods or services and have no direct supply chain exposure to modern slavery risks.

Modern slavery risks

We recognise the importance of identifying all human rights risks, including modern slavery risks within our operations and our supply chains. The widespread nature of modern slavery, means people perpetrating or those impacted by modern slavery may potentially travel on our roads. Understanding these risks mean we can seek to equip our teams to respond appropriately in the event that a potential instance is detected.

The UN Guiding Principles on Business and Human Rights (UNGPs)

The UNGPs¹ establish a framework for businesses to guide the prevention of, and response to involvement in, human rights harm – including modern slavery (see Figure 9). Our risk-assessment processes are designed to align with this framework. This includes assessing how we could potentially cause, contribute to, or be directly linked to potential or actual instances of harm, including negatively impacting human rights. This includes modern slavery. Transurban's risk identification and assessment processes also apply to Transurban owned or controlled entities.

Figure 9 – Continuum of involvement framework example

	Involvement	Expected actions and remedies
Cause	Directly engaging in modern slavery (such as forced labour) in its operations.	• cease or prevent the situation • provide or cooperate in legitimate remediation.
Contribute	Acting to influence (for example, via contract negotiations) a supplier to use modern slavery practices (such as debt bondage) to supply work.	• cease or prevent its contribution • use its leverage to mitigate remaining impacts • provide or cooperate in remediation in line with involvement.
Directly linked	Unknowingly engaging a supplier that uses modern slavery practices (including deceptive recruiting) in providing its goods or services	• seek to prevent and mitigate the impact • use its leverage to play a role in remediation to the extent possible.

Sustainable Procurement Risk Heat Map

Our Sustainable Procurement Risk Heat Map, which is informed by Transurban's Risk Management Framework, ISO 20400:2017 Sustainable Procurement Guidance and the UNGPs, provides a macro view of the goods and services' procurement categories with potentially higher risks (likelihood and severity) of modern slavery occurring.

We update this map at least annually, and we use the map to assess our suppliers and categories of spend against determined risk profiles. Our assessment considers higher-risk activities that may exist deeper within our supply chains when we attribute risks, for example, risk associated with labour in the manufacturing of components, or labour used in the extraction of raw materials. However, we acknowledge supply chains can be complex and our risk-identification approach will evolve as we identify and assess these deeper supply chain activities.

Our risk heat map uses the information sources outlined in Appendix B, and during this reporting period was again refreshed with our spend categories and geographical sourcing locations.

Risk assessment outputs

Operations

We assess the risk of causing or contributing to modern slavery in our operations as low due to factors, including:

- Our operations are in countries whose jurisdictions are considered to have lower modern slavery risks on a global comparison.²
- The office and site locations, job roles and activities undertaken in our direct operations have not generally been identified as being high-risk.
- Our direct employees have formal contracts or written terms that are guided by internal policies, principles and practices put in place by Transurban based on applicable laws.
- We consider our workforce to be predominately highly skilled and based on international research reporting, this cohort of workers is generally at a lower risk of vulnerabilities that contribute to modern slavery.
- We engage in fair and ethical recruitment practices, including prohibiting recruitment agencies from charging fees to potential employee candidates.
- Our operations workforce participates in modern slavery awareness and training programs with content covering knowledge of rights, freedoms and access to grievance channels, including mandatory induction training on these topics for new starters and contingent workers and regular 'refresher' training – over 2350 workers completed the relevant training during FY25.
- We do not retain any workforce original identity documents (e.g. passports).
- Our workforce is engaged on employment terms which include fair remuneration, leave entitlements, work flexibility and freedom to unionise.

At an operational level, our potential involvement in modern slavery risks to people principally relates to our four corporate-structure entities that employ staff. Most (90%) of Transurban employees are directly employed by Transurban Limited.

In FY25, our direct workforce included:

- 203 visa-holding employees
- 90 part-time employees
- 3 casual employees.

We have established mechanisms to address the risk of modern slavery occurring within our operations, including providing our people with clear employment contracts, and maintaining appropriate internal policies, procedures and practices (see page 13).

All Transurban employees are free to engage in collective bargaining and can leave their employment without material restrictions. Our employees also complete mandatory workplace training on ethical business practices, anti-bribery and corruption, harassment, bullying, discrimination, whistleblowing services and grievance channels (see Grievances and remedy on page 18). Employee understanding of key issues is assessed within training modules; and training completion is included in our employees' performance requirements.

We recognise that other human rights issues could arise in our operations. These salient human rights issues are detailed within our [Human Rights Policy](#).

¹ *Guiding Principles for Business and Human Rights: Implementing the United Nations (UN) Protect, Respect and Remedy Framework, UN Global Compact*

² *Based on comparative prevalence from information obtained from the [Global Slavery Index](#)*

Vulnerable group identification

We recognise some groups may be more vulnerable to modern slavery risks, including contract and contingent-managed workers. As these workers are contracted through professional services labour firms, they are included in our supply chain risk assessment. However, we consider these workers are likely to also be at low risk of modern slavery due to their skills and expertise, the duties they perform and the locations where they provide their services. In addition, contingent workers have access to Transurban's whistleblower service, Fair Call, and are provided resources and training to support their awareness of avenues to raise concerns.

Supply chains

Transurban's more inherent modern slavery risks exist within our supplier relationships and can be inherently higher due to the geographic locations of where goods are made or services are performed, such as countries with no or low protection for workers,

or a weak rule of law. It may also be more prevalent in supply chains which are known to have poor practices, reliance on low-skilled labour, temporary labour, migrant labour or other groups of people who may be more vulnerable to modern slavery risks. These are our prioritised focus due to the higher potential for modern slavery to occur.

Priority risk categories and assessment

Our FY25 assessment activities indicated it is unlikely Transurban would directly cause or contribute to modern slavery due to the proximity of modern slavery risks being higher in complex upstream supply chains. However, we recognise we could be linked to labour rights and human rights issues, and modern slavery impacts through our supply chains.

We also understand that we could contribute to harm through our actions to influence the supply chains or if we fail to take appropriate actions against suspected harm as expected under the UNGPs.

Figure 10 – Priority risk categories

Priority risk category and proximity	Vulnerability, prevalence and modern slavery inference
1. Tier 1 Supply chain: Onsite cleaning services	Cleaning services is considered a high-risk category due to the industry's reliance on: migrant, visa holder and gig workers; subcontracted labour; the basic skillsets required; and limited barriers to accessing work. All these elements increase cleaning services workers' vulnerability to modern slavery, labour and human rights abuses – for example, debt bondage, forced labour or coercive and exploitative situations. In FY25, our supplier evaluations continued to indicate both cleaning and general labour services are a recognised risk in our indirect supply chains. We engage with our direct contracted suppliers on addressing these risks. Given the industry's ongoing high-risk status, including its labour sources and established operational practices, vigilance remains necessary.
2. Tier 3+ Supply chain: Construction materials	Our major projects and operations and maintenance activities include the use of raw materials and components that may be assembled in, or originate from, countries where people are more vulnerable to labour and modern slavery risks, and where modern slavery is more prevalent. Construction materials such as steel, pre-cast concrete, imported materials, electrical equipment, components and wiring could potentially be manufactured at sites engaging in forced labour or deceptive recruiting. Further, raw materials used in components could be mined by exploited children in dangerous environments. We continue to evaluate suppliers, map supply chains and investigate key material upstream steps to improve our identification of risks to people.
3. Tier 2+ Supply chain: Labour	As detailed throughout this statement, we recognise that vulnerable labour sources may be engaged in the provision of goods or services in Australia or offshore. Debt bondage, forced labour and coercion are the particular forms of modern slavery that could be prevalent in labour supply chains. Especially vulnerable groups are migrant workers, women and children. We continue to raise this topic within our industry groups and with suppliers to collaborate on efforts to further reduce risks to people in our supply chains and across our industry. Modern slavery issues could occur domestically in construction, offshore in high-risk countries with prevalence of modern slavery, or in high-risk sectors such as call centres or steel making industries.
4. Tier 2+ Supply chain: Technology and ICT equipment	It is well documented that forced labour and other forms of modern slavery could be present in the development of technology components produced in large scale offshore factories, as well as the mining and processing of raw materials used to make them. We recognise that these issues can be difficult to tackle with the complexity, size and scale of the suppliers involved and the minimal leverage that we may have. We continue to review and evaluate the actions that our multi-national technology suppliers take to assess and address modern slavery risks.¹

¹ Electronics is the highest value at-risk import for most G20 countries, worth estimated US\$243.6 billion. Global Slavery Index, [walkfree.org/global-slavery-index/findings/importing-risk](https://www.walkfree.org/global-slavery-index/findings/importing-risk)

Our approach

Our overall approach to managing modern slavery risks remains consistent across all reporting periods to date and we continuously work to improve and enhance aspects of our approach.

Our established governance, due diligence, grievance and remedy procedures and processes are integral to our approach, and provide consistency and clarity for our workforce, suppliers and partners and the wider industry. One of our goals is to continue increasing overall understanding of modern slavery risks and the actions needed to address these risks across our operations and supply chains. The training and capacity building we engage in with both staff and suppliers is strengthening our approach across our day-to-day operations.

Governance

The Board has oversight of Transurban's wholly-owned and controlled entities. The Board's structure is described on page 5 and the modern slavery governance structure as set out below in Figure 11. Our governance and risk management approach is detailed in our [FY25 Corporate Report](#) and in our [FY25 Corporate Governance Statement](#).

Our Procurement Team implements our Sustainable Procurement Program. This program determines the actions that Transurban (and Transurban's owned or controlled entities) will take in assessing and addressing modern slavery risks. The Procurement Team reports to our Chief Financial Officer and provides updates, through functional reporting channels, to the Board and Executive Committee.

Our Sustainable Procurement Business Leadership Group consults and informs management on the implementation of agreed actions for assessing and addressing Transurban's modern slavery risks and broader sustainable procurement activities. This group comprises a cross functional team of senior enterprise leaders from across Transurban.

During the reporting period, changes across the organisation impacted the frequency of meetings, however the group continued to be informed on, and had input into key issues that shape our sustainable procurement actions including:

- Awareness of global events and issues that may impact our business, supply chains and potentially affected workers – such as the effects of conflict on supply chains
- Regulatory changes both domestically and internationally which may impact on sustainable procurement activities, including the appointment of the Australian Anti-Slavery Commissioner
- Internal policy enhancements, such as our [Human Rights Policy](#) and [Supplier Sustainability Code of Practice](#)
- Best practice and sustainable procurement activities which may inform our actions, including our approach to auditing suppliers operating in higher risk contexts such as our supplier call centres.

Policies and procedures

Transurban maintains a suite of policies and procedures that set out our overall approach to managing modern slavery risks within our operations and supply chains. We provide information on these policies and procedures in each modern slavery statement, with descriptions detailed in Figure 12.

Our employees, contractors, suppliers and entities are expected to comply with the relevant policies and procedures, and this expectation is reflected in our employment agreements and supplier contractual controls. Where businesses outside Australia are subject to local law requirements that necessitate adopting separate policies, Transurban expects these policies will be aligned, to the extent possible, with our own. Setting unified expectations and standards across our operations and supply chains, and driving consistent application of our policies, are key elements of our approach to managing modern slavery risks.

Figure 11 – Modern slavery governance structure



Figure 12 – Relevant Transurban policies and procedures

Public	Policy or procedure	Scope and description	Implementation and actions
	<u>Code of Conduct</u>	Details employees' responsibilities on topics including bullying and harassment, equity and diversity, risk management, fraud and sustainability.	• available on our employee intranet and the Transurban website • mandatory annual review for all employees, including attestation.
	<u>Human Rights Policy</u> Updated in FY25	Describes how Transurban aims to fulfill its human rights commitments, including reducing and responding to adverse human rights impacts (including modern slavery) and provides guidelines for actions on implementation.	• available on our employee intranet and the Transurban website • employee training provided within the Contract Management Framework process.
	<u>Sustainability Policy</u>	Describes Transurban's sustainability approach across four pillars: people (including the safety of people in our operations and supply chains); planet; places and partnerships; and demonstrates how our approach supports the UN SDGs.	• available on our employee intranet and the Transurban website.
	<u>Supplier Sustainability Code of Practice (SSCoP)</u> Updated in FY25	Sets out the minimum standards and leadership expectations new and existing suppliers must meet – including for labour and human rights; and encourages suppliers to go beyond legal compliance in advancing their social and environmental approaches.	• available on our employee intranet and the Transurban website • included in supplier contracts • employee training provided within the Contract Management Framework process • supplier performance tracked via our evaluation tool.
	<u>Whistleblower Policy</u>	Explains how Transurban supports reporting of issues including reporting indicators of potential or actual cases of modern slavery. Provides information to support trust and transparency in the mechanism and process of remediation.	• available on our employee intranet and the Transurban website • annual employee training • electronic signage and posters displayed at our workplaces • regular reporting to management and Audit and Risk Committee.
	<u>Diversity and Inclusion Policy</u>	Details our commitment to diversity, equity and inclusion at all levels of the organisation, including its importance in driving our organisation's success and its relationship to our values. Also details our commitment to providing harassment-free and inclusive working environments, flexibility, pay equality, and equitable opportunity.	• available via our employee intranet and the Transurban website • measurable diversity and inclusion objectives are reported in our Corporate Governance Statement • annual objectives are set in the context of Transurban's strategy, purpose and operating environment.
	<u>Anti-Bribery Corruption and Fraud Policy</u>	Outlines our approach to preventing, detecting, deterring and managing bribery, corruption and fraud risks. Applies to our employees, contingent workers, consultants and suppliers.	• available on our employee intranet and the Transurban website • gifts and benefits register • mandatory annual employee training • accompanying procedure • regular reporting to management and Audit and Risk Committee.
	<u>Conflicts Management Policy</u>	Details our approach to managing conflicts of interest; potential or actual conflict of interest declaration requirements; and appropriate response strategies. Applies to employees, contractors, consultants and suppliers.	• mandatory annual employee training • conflicts of interest register • available on our employee intranet and the Transurban website • accompanying procedure • regular reporting to management and Audit and Risk Committee.

	Policy or procedure	Scope and description	Implementation and actions
Internal	Procurement Policy	Details our commitment to aligning with ISO 20400:2017; and to include sustainability considerations (including human rights) in our sourcing processes. Sets out procurement requirements, including: high-risk category triage; risk heat map use; contract and purchase order processes; and policy breach measures.	• available on our employee intranet • policy is included in Contract Management Framework training • our legal chatbot provides automated guidance.
	Employee Policy Handbook (US)	Supports US employees in understanding their rights and their responsibilities in complying with employee conduct expectations. Includes US-specific information on harassment, misconduct, anti-bribery and corruption, overtime, employee entitlements and whistleblower services.	• provided to employees upon hiring for review and confirmation • available on our employee intranet • regularly reviewed and updated • key topics covered in our internal Code of Conduct attestations.
	Employee Policy Handbook (Canada)	Supports Canadian employees in understanding their rights and their responsibilities in complying with employee conduct expectations. It includes Canadian and Quebec-region specific information on employee rights, harassment, bullying, misconduct, anti-bribery and corruption, overtime, employee entitlements and whistleblower services.	• provided to employees upon hiring for review and confirmation • available to access via intranet • provided in French-Canadian language • reviewed and updated as required.
	Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines	Details how employees can raise issues relating to actual or potential modern slavery in our supply chains. Explains triage and assessment processes and remediation actions. processes align with our Whistleblower Policy. See Grievances and remedy on page 18 for more information.	• available on our employee intranet • included in Contract Management Framework and Modern Slavery training.
	Contract Management Framework and Policy	The framework and policy requires team members to adhere to a standardised contract management and administration approach. It also describes contract management roles and accountabilities and provides guidance for employees on responsible and sustainable procurement activities.	• available on our employee intranet • mandatory requirement for strategic and collaborative contracts (high risk and high value) • reviewed annually • regular training sessions provided to contract managers on this framework.

For more information on our policies and our approach to ethical conduct and responsible decision making, see our [FY25 Corporate Governance Statement](#). Key policies are available on the [Transurban website](#).

Supporting small businesses and social enterprises

Considered purchasing practices can help reduce downward pressure on supply chains – a potential contributor to modern slavery occurrences. Transurban is a signatory to the Australian Supplier Payment Code,¹ led by the Business Council of Australia. This is a voluntary code that asks signatories to pay eligible ‘small businesses’ on time and within 30 days of receiving a correct invoice.

In the first half of FY25, 5.7% of Transurban's overall Australian spend was with 466 small businesses (as defined in the Code), and we paid 99.1% of Australian small businesses within 30 days.

Additionally, we continue to extend further support to our social enterprise and First Nations suppliers, and pay these invoices within 14 days.



¹ Australian supplier payment code, Business Council of Australia

Our due diligence

Our due diligence approach is informed by international human rights standards including the ILO Declaration of Fundamental Rights at Work¹ and the OECD Guidelines for multi-national enterprises.

We track how we and our suppliers meet our policies and contractual requirements. We integrate our findings and use the overall picture to identify opportunities for improving our actions and processes.

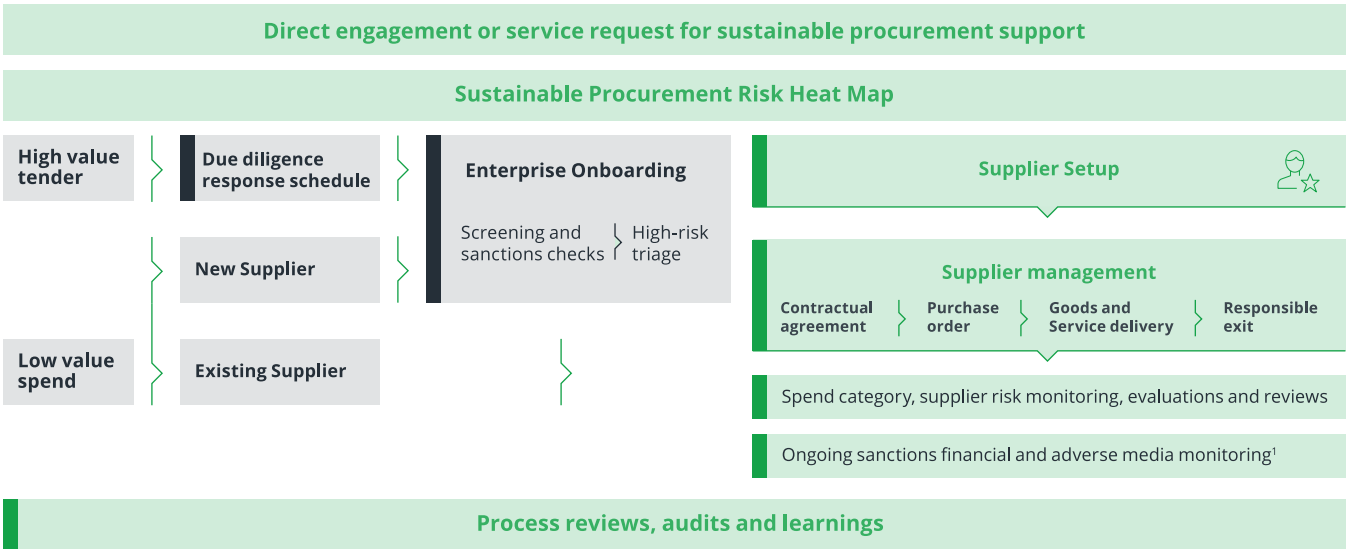
Figure 13 shows, in general terms, our process to integrate due diligence activities into our supply chain management – including the key controls, tools and processes we use across the procurement

lifecycle. As shown, assessments are conducted at multiple points in the procurement lifecycle, including actions to test whether our procurement could cause, contribute or be directly linked to potential or actual instances of modern slavery or adverse human rights impacts. This includes reviewing our potential spend against high-risk categories.

During FY25, 39 suppliers were triaged through to our Sustainable Procurement Manager for investigation and assessment of their labour and modern slavery actions through our enterprise supplier onboarding tool.

We continue to upskill our procurement team members, learn from our supplier engagements and use these learnings to improve our processes to better mitigate and reduce risks to people in our extended supply chains. We have also completed due diligence assessments for business partners and customers as members of their supply chains and through our connected relationships.

Figure 13 – Modern slavery due diligence process (suppliers)



This table represents a simplified process map of key modern slavery risk triage points and tools and processes involved to identify and monitor risks of modern slavery in our supply chain

Ongoing monitoring, tools and actions
Key triage checkpoints which include modern slavery risks

¹ For more information, visit the [International Labour Organization's website](#)

Due diligence tools

We conduct due diligence throughout the supplier engagement lifecycle, via the tools described in Figure 14. These tools collectively drive ongoing risk monitoring of modern slavery related issues, tailored to each procurement stage. Our due diligence approach is under constant review, including through collecting stakeholder feedback, to improve our effectiveness at identifying risks.

Figure 14 – Due diligence tools overview

Tool	Description
Sustainable Procurement Risk Heat Map	Used to map goods and services purchase categories against assigned risk levels. Prior to engaging a supplier, employees can seek advice on contract inclusions and other appropriate measures. High-risk categories are used to triage new suppliers or contracts for investigation (see below).
Tender response schedules	Used during major procurement activities (for example, purchases above a specified contract value) where detailed response schedules are self-reported by suppliers to demonstrate their ability to meet our codes and policies. Schedule questions align with the UNGPs, including covering mitigating risks to people in operations and extended supply chains. Assessment of these schedules by an agreed evaluation team informs the awarding of tenders.
Supplier screening	Used to conduct financial, director, and company ownership checks to identify known issues such as labour concerns, illegal behaviour, insolvency risks and other indicators that may lead to adverse human rights impacts in our supply chains. Our procurement team engages third-parties to provide information and reviews suppliers against entity sanctions lists. Selected suppliers are continuously monitored using third-party risk screening tools and desktop assessments.
Supplier high-risk triage	Used to determine if new suppliers are providing high-risk goods or services, with high-risk procurement activities triaged to the Sustainable Procurement Manager. Further investigations may comprise a desktop review, or potentially seeking additional supplier-control information from the supplier, the Transurban contract manager or both. We may decide not to onboard suppliers with insufficient controls, or we may require suppliers commit to improvement or corrective actions within specified timeframes prior to onboarding.
Enterprise supplier onboarding	Self-assessment questionnaires used prior to onboarding provide early notification of potential risks and rapid-triage. Available questionnaires cover specific topics, (including labour and modern slavery) and capture key information, capabilities, qualifications and risks, including migrant labour use. Completed surveys are managed digitally and are assessed by subject-matter experts for action as required. We are also re-qualifying existing suppliers for consistency in risk management actions. Transurban may request further information, allocate a risk score, reject a supplier's onboarding application, or initiate supplier improvement expectations based on questionnaire responses.
Supplier evaluation tool	Used to assess suppliers' key modern slavery risk controls, including its own policies and processes and those applicable to its supply chains. This tool also captures granular information – such as supplier transparency and supplier risk mitigation score assessments – that supports assessment of tender submissions and onboarding, and is used to inform future programs of work targeting refined human rights risk areas.
Contractual controls	Used to establish binding labour-related and modern slavery obligations for suppliers. For example, requiring suppliers to report potential or actual cases to us, and passing payments to contractors upstream in the supply chain (to reduce labour-related risks beyond Tier 1). We draw on external expertise to establish practical and best-practice contractual arrangements.
Social and labour audits	Social and labour audits are used to conduct site and time specific, evidence based due diligence to support in the identification of indicators or actual instances of labour rights or human rights abuses. Suppliers operating in high-risk countries, sectors or that have been flagged as higher-risk are prioritised to undergo or provide evidence of audits completed by independent credible auditing bodies. Audits include detailed assessments of a supplier's compliance with applicable laws and International Labour Organisation standards, including identifying any indicators of child labour, forced or bonded labour and whether recruitment fees have been charged or confiscation of personal documents has occurred.

Case study

Evaluating our supplier's controls

Our supplier evaluation tool,¹ summarised below in Table 1, and established in FY22, enables our ongoing assessment and monitoring of our suppliers' modern slavery risk controls and governance, both in the suppliers' own operations and in their supply chains.

As part of our primary ongoing due diligence, we assess and track our suppliers controls and actions using our supplier evaluation tool.

During this reporting period, we reviewed and enhanced the tools components, including the evaluation criterion and tool functionality.

In FY25, we undertook new or updated existing evaluations of 166 suppliers, increasing our evaluation coverage with over 84% of Transurban's annual supplier spend being assessed within the past 24-months.

Evaluation trends

Through our engagement and our due diligence processes we are beginning to track the trends in controls and actions that our suppliers have, with the aim to improve these controls over time.

In FY25, we saw an increase in suppliers implementing policies and processes to reduce the likelihood of modern slavery occurring.

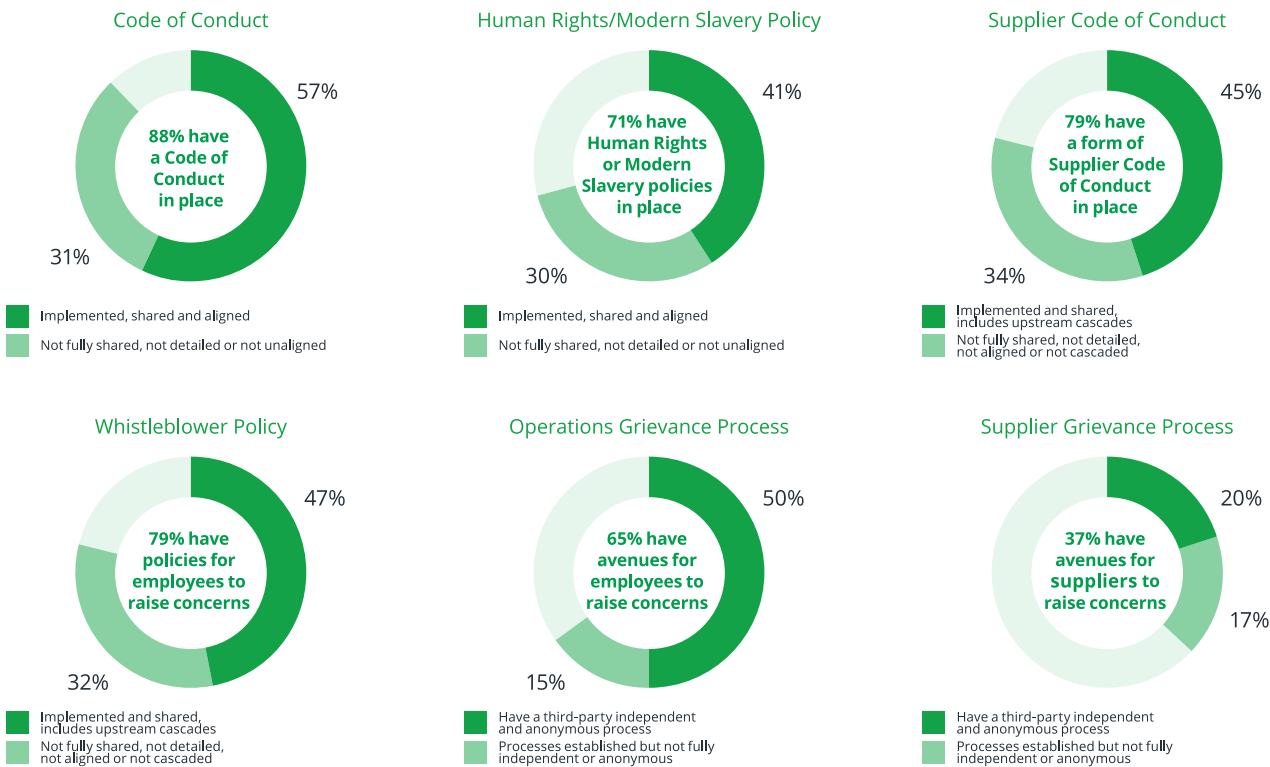
We received more transparent information from our engaged suppliers who communicated that they had codes of conduct in place, policies that supported human rights or the elimination of modern slavery as well as having mechanisms to raise concerns and protect disclosers. We also saw increases in suppliers who had developed and implemented their own supply chain codes, working to prevent harm further upstream.

Again in FY25 we saw overall improvement in the disclosure of suppliers. The percentage of suppliers and business partners providing information in line with our Supplier Sustainability Code of Practice (SSCoP) minimum requirements, increased from 71% in FY24 to 79% in FY25. We noted that suppliers are taking further actions deeper in the supply chains and are continuing to implement self-assessment questionnaires as well as moving to more rigorous audit methods. Suppliers implementing some form of social and labour audits increased from 34% in FY24 to 42% in FY25.

Table 1 Supplier evaluation methodology

Transparency score (quantitative)	Risk management and health score (qualitative)	Supplier Sustainability Code of Practice (SSCoP) alignment (compliance)
This score reflects the number of key issues titles responded to, drawn from 33 data points informed by our core policy expectations, the UNGPs and Modern Slavery Act guidance material.	This score is based on the quality of actions taken, measured on a three-point scale, against an issue title.	This score is based on five issues titles assessed against SSCoP minimum criteria and assessment of 38 issues titles.

Figure 15 – Assessed supplier findings overview



¹ Information is gathered and assessed from desktop research, publicly reported information, or direct disclosure of requested information by suppliers to Transurban as part of our due diligence processes.

Case study

Conducting due diligence on labour services in high-risk countries

We strengthened our due diligence approach during this reporting period by engaging an independent third-party auditing firm to conduct targeted on-site social and labour audits for our offshore call centres operating in The Philippines.

Our global call centre partner operates two call centres on different shifts for Transurban, providing support services to our customers in Australia and North America. These two sites work on different shift patterns to service these global regions in each of their time zones.

We chose to implement semi-announced SMETA 7.0 4-pillar audits at each of the locations. Although the supplier had previously not undertaken audits at these sites, they were collaborative in the process to implement and support a comprehensive audit.

The scope of the audits assessed the four-pillars of the SMETA methodology: labour standards; health and safety; environmental performance; and business ethics. This enables a broader perspective of insights on human rights and environmental risks, beyond just labour risks.

There were no critical non-conformances identified against the supplier.

Findings that were identified related to opportunities to improve the due diligence of Tier 2 suppliers in their supply chains and assessing the contracts, documents and practices of hiring workers for security and cleaning services to the supplier.

All findings were accepted by the supplier and have corrective action timelines proposed.

Using findings to monitor broader human rights linkages

Conducting due diligence activities such as audits not only supports our efforts to assess and address modern slavery risks in our supply chains, they also provide insights to help assess and address broader human rights and environmental risks.

We use the findings from audits to inform our due diligence and track indicators against human rights impacts, which include:

- Childrens' rights to be protected: checking child labour through age verification
- Rights to be free from discrimination: through worker interviews and observations of policies and behaviours during audits
- Right to life: assessing building and operational safety in the workplace
- Right to work and fair remuneration: assessing worker wages, living wage benchmarks, social securities and employment contracts
- Rights to unionise: identifying whether workers are restricted from freely unionising in the country or working location, and understanding whether unions or worker committees are in existence and operational
- Freedom from slavery: identifying actual or suspected cases of modern slavery.

Grievances and remedy

Access to remedy is a core component of the UNGPs. If we were to cause or contribute to adverse impacts, we would provide for, or cooperate in, remediation through legitimate processes. Where applicable, we would also seek to exercise leverage –including contractual or legal rights to address any adverse human rights impacts or incidents in which we may be involved, including incidents relating to modern slavery.

We provide both internal and external channels for our employees, contractors and supply chain personnel to raise concerns on issues including potential or actual instances of modern slavery, as well as fraud, conflicts of interest, bribery and corruption. This includes an independent external whistleblower service that can be contacted via toll-free telephone, online or post. Reports to this service can be made anonymously.

In FY25, we continued to drive awareness of this service, including via updated e-learning training, tailored training sessions for suppliers, procurement team members and a specific supplier incident response crew operating in NSW.

Information shared with each of these groups included:

- Overviews of modern slavery, including forced labour and child labour
- What controls Transurban has in place to prevent and respond to these situations
- Tailored information and actions important for each of these groups, including the risks and response in identifying human trafficking on our road networks.

Our grievance channels, including our independent external whistleblowing service received 6 reports during the reporting period. None of these reports related to potential or actual instances of modern slavery.

A less formal channel is also available to our employees who can raise issues internally via an intranet form. Issues raised are directed to our Sustainable Procurement Manager.

Remediation guidelines

Our Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines outline the steps we will take if potential or actual instances of modern slavery are identified in our supply chains. We recognise these issues can be complex and sensitive to navigate, so our guidelines are designed to prioritise the protection and support of identified victims.

These guidelines are available to all employees via our intranet. We aim to improve and develop these further as we continue to learn about effective remediation.

Case study

Training our supplier incident response teams

Safety is a key focus at Transurban, including the safety of our customers, communities and people who may be negatively affected by our road operations or construction activities. This includes the safety of customers and community members (our downstream value-chain) who may be vulnerable to financial issues, potentially including vulnerability to labour exploitation or modern slavery situations.

During FY25, we engaged with critical suppliers providing incident response services on our roads. This year we continued to roll out specific training to frontline team members of our incident response service provider, Ventia. In consultation with our supplier, we targeted an area along the M5 South West corridor in NSW where first responders may come into contact with vulnerable people. There are well documented incidents of labour rights abuses, human rights abuses and incidents of modern slavery linked to horticulture and other industries in NSW where these roads could be used as corridors between airports, metropolitan areas and these remote or rural settings¹. Our aim was to upskill first responders who may be in a position to identify indicators of modern slavery.

Our interactive training:

- Explained in detail what is modern slavery is and challenged perceived thinking about the prevalence of modern slavery in Australia
- Provided real life examples of modern slavery in Australia, where people were coerced and trafficked internationally and domestically – including through metropolitan cities to rural and remote areas and exploited, highlighting potential travel routes of traffickers, and where these incidents are more likely to occur on our roads
- Provided insights into migrant labour risks and examples of exploitation
- Engaged participants to workshop indicators of people who could be in modern slavery or vulnerable situations
- Provided practical tips to incident responders on how to engage with people on our roads and how to respond without exacerbating harm.

Attendees shared their own experiences and observations from real-life incidents and workshopped strategies for responding to incidents where road users could be agitated or distressed.

Attendees were also given information on internal and external avenues for reporting suspected modern slavery incidents.

Training and capacity building

Our awareness raising, training and specialised capacity building is designed to better equip our employees and our supplier partners to understand how modern slavery may occur in our operations and supply chains, and how to identify and respond to modern slavery risks. Transurban employees complete mandatory online training on our policies and positions on:

- **Ethical business practices and privacy:** Our expectations related to giving and receiving gifts, benefits or entertainment; fraud, bribery and corruption; conflicts management; and how these topics relate to modern slavery; privacy and whistleblower policy and protections and support available to disclosers.
- **Equal opportunity and anti-discrimination:** Equal opportunity employment; workplace discrimination and harassment laws including state and federal laws; effects of workplace discrimination and harassment; what to do when faced with these behaviours in the workplace.
- **Respect at work and sexual harassment:** Workplace sexual harassment; and what to do if exposed to any form of sexual harassment in the workplace.
- **Health, safety and environment (HSE) contractor management:** Our active client contractor management approach; how to implement contractor management assurance; employees' HSE role within our contract management framework.
- **Code of conduct:** Our mandatory behavioural standards and obligations.
- **Whistleblower policy:** Processes for raising concerns (including anonymously) including for situations of potential or actual instances of modern slavery.
- **Modern slavery:** Modern slavery risks; stories from people with lived experience; extended supply chain risks; policies; indicators; what actions to take to raise concerns or for help.

¹ *Parliament of NSW, Inquiry into modern slavery risks faced by temporary migrant workers in rural and regional NSW*

Training deployment approach

Mandatory training is deployed to all eligible employees¹ either annually or every two years. Training is supported by internal communications, intranet content (including relevant policy downloads) and websites. All training modules are also accessible as on-demand content.

In addition, during FY25, detailed training workshops on modern slavery, and key requirements under the Act were also held for procurement team members and key contract managers as part of our wider program.

During the reporting period we conducted a specialised training session for our central procurement team members providing upskilling opportunities to understand the use, implementation and outcomes from social and labour audits.

The training session took the team through why audits are a good tool to support due diligence, how they are used and what insights and outcomes they can deliver to mitigate against risks to people.

The training connected broader human rights examples to the social and labour audit issues that are assessed and explained how audit findings are reviewed and corrective actions are implemented.

We continued to conduct and support key supplier and wider industry workshops, designed to build collective working knowledge of and capacity to address modern slavery risks. Collaborating and sharing insights with like-minded industry partners improves overall understanding.

For more information, see collaboration and industry engagement on page 22.

Case study

Improved our modern slavery e-Learning

Modern slavery can occur in any setting and in any country. Even more so, poor labour practices and actions by any person or organisation can lead to the decline of rights and rise of situations where modern slavery can occur in everyday settings. We continue to update and improve our training to people on situations that could potentially occur in the infrastructure road sector.

In FY25, we updated our employee mandatory e-learning training on modern slavery. We developed this e-learning module internally and deployed it through our enterprise Learning Management System. We used insights from our industry collaborations (see page 22), external human rights expertise, supplier engagements and the information from our risk assessments and supplier evaluations to determine the bespoke content specific to Transurban and our risks.

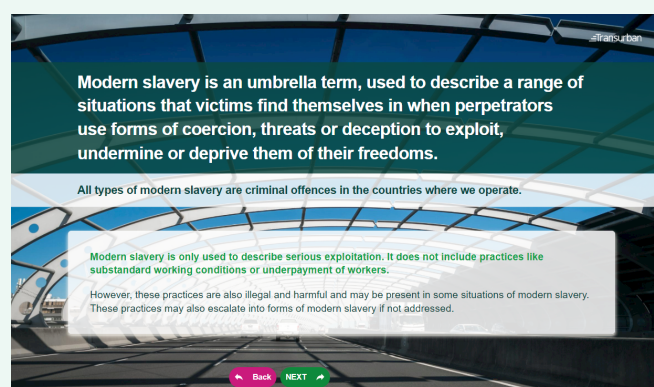
We tailored the content specifically for the countries where we operate, the regions and sectors of our supply chains and the likely risks to people that might occur in our operations and supply chains.

The learning module included:

- The types of modern slavery and the global prevalence of modern slavery, forced labour and child labour.
- Where in a company's value chain modern slavery is most likely to occur.
- The size, scale and examples of modern slavery incidents in the countries where we operate.
- Our operational and supply chain policies that are in place to mitigate the risks to people, and support contract and people managers in their roles.
- Examples of the high-risk categories Transurban has identified.
- Case studies on areas and issues that could prevail in our supply chains based on real life accounts of modern slavery incidents.
- Who could be vulnerable and susceptible to modern slavery.
- Signs and indicators of people who could be in a modern slavery scenario.
- What our employees can do to raise concerns, should they suspect something.

Throughout the training there were learning checks to support the retention of information for employees, and to test their knowledge and awareness of the material content.

The module was deployed in English and French-Canadian.



Learning check: What are some of the signs of a person who could be more vulnerable to situations of modern slavery?

select all correct answers (you can select more than one)

- ☐ They are working in an isolated or remote location
- ☐ They may be of foreign nationality and unable to speak the local language well
- ☐ A person without any formal qualifications
- ☐ An office worker in a city location
- ☐ A person working based on a handshake agreement rather than a formal contract

BACK

CLEAR

SUBMIT



¹ Eligible employees, including managed contractors at the time of deployment, with some exclusions

Measuring effectiveness

Transurban assesses the effectiveness of our actions to address modern slavery and uses feedback to refine our program.

We continue review best practice and implement process enhancements to better measure our effectiveness. We will continue evolving and maturing our processes to better measure the impact and effectiveness of our efforts.

Improvements introduced over the reporting period included:

- Refining the consistency of criteria and functionality of our evaluation tool
- Updating and enhancing our general and specific training internally and working collaboratively with peers and partners to raise awareness and investigate modern slavery risks across our industry and supply chains.

We will continue to assess the effectiveness of our actions and those of our suppliers, including through quantitative metrics, qualitative reviews and feedback, to identify opportunities for incorporating changes that enhance our continuous improvement approach. The controls, actions and indicator framework we currently use are shown in Figure 16. Appendix B provides data on our progress in assessing and addressing these actions.

We believe our employees' awareness of modern slavery has deepened over time, as has their understanding of their roles in helping assess modern slavery risks and in raising queries or potential issues.

Figure 16 – Performance measures and effectiveness indicators

Workstream	Control or action	Effectiveness indicators
Governance	Policies and guidelines related to modern slavery and human rights	Periodic reviews of policies and guidelines.
	External benchmarks, assessments and research reports	Global and national benchmark results (e.g. Dow Jones Sustainability Index) academic research (e.g. A2J Lab's Human Rights Assessment of top Australian companies) and specific modern slavery disclosures benchmarks and reports.
	Internal audit on controls	Auditing processes and controls relating to assessing and addressing modern slavery. Completion of actions in response to audit findings.
	Internal governance groups	Convening of our Sustainable Procurement Business Leadership Group. Completion of meeting action items. Qualitative feedback from these leadership meetings on improvements in actions and their effectiveness.
	Sustainable Procurement Program key performance indicators (KPIs)	Adherence to Contract Management Framework and Policy. Meeting annual key performance indicators related to continuous improvement in assessing and addressing modern slavery risks in Transurban's operations and supply chains.
	Integration of modern slavery considerations into sourcing practices managed directly by the Procurement Team	Mandatory supplier self-assessment questions in relation to human rights including modern slavery used in sourcing activities managed directly by the Procurement Team.
Risk management	Risk assessment	Annual review of Sustainable Procurement Risk Heat Map, which includes modern slavery risk assessment methodology.
	Risk register tracking	Actions taken against corporate risk register items regarding modern slavery.
Monitoring	Issues raised through our grievance mechanisms	Accessibility and utilisation of mechanisms. Number and types of issues investigated and remediated.
	'Our Voice' annual employee survey	Gathers feedback on confidence in leadership: customer focus; sustainability and social licence; diversity and inclusion; work environment and more.
	Supplier and Business Partners survey and engagement	Qualitative feedback to identify areas of focus where Transurban can enhance actions to collaborate with suppliers on mitigating modern slavery risks.

Collaboration and industry engagement

Transurban continues to contribute to industry progress in tackling modern slavery, including engaging on policy, collaborating on activities¹ and promoting awareness.

During FY25, Transurban representatives participated in collaboration with industry and co-sectoral initiatives to share knowledge and learn from others. We also undertook joint initiatives with industry groups to drive stronger and more coordinated outcomes across the community.

We continue to engage with our industry peers to collectively act, share our knowledge where we can help others, and learn from peers and experts. FY25 collaboration and engagement activities included:

- Co-chairing the ISC's Modern Slavery Coalition (see case study on this page).
- Participating in the Australian Government's Modern Slavery Expert Advisory Group, led by the Attorney-General's Department.
- Participating in the UN Global Compact Network Australia, including participating in the network's Modern Slavery Community of Practice – Optimising Stream. Our involvement includes: committing to the 10 principles; building our human rights and modern slavery knowledge; engaging with experts; sharing insights; and increasing supportive remediation networks.
- Providing input and insights to the Anti-Slavery Commissioner's Strategic Plan development and best practice guidance.

FY25 ISC Modern Slavery Coalition summary of activities

Transurban, engages in the ISC to collaborate with our industry peers and to take a leadership approach within our sector to tackle modern slavery.

The ISC's Modern Slavery Coalition was established in 2019 in response to the introduction of Australia's *Modern Slavery Act 2018* (Cth). The Coalition aims to accelerate the eradication of modern slavery from infrastructure supply chains by shifting industry from a place of reactive compliance to one of transformational leadership.

Transurban is the Co-chair of this group along with recognised human rights experts from Pillar-Two

During the reporting period, the ISC's Modern Slavery Coalition continued to work collaboratively to progress a series of modern slavery-related knowledge sharing, capacity building, and due diligence initiatives. These included:

- Progressing opportunities for the Modern Slavery Coalition to drive sector-wide collaboration and align due diligence approaches across the infrastructure sector, including through developing a template supplier self-assessment questionnaire with a common question set for optional use by ISC members.
- Undertaking a deep dive on labour hire in Australia's infrastructure sector to support members' understanding of possible modern slavery risks, as well as broader human rights risks, present in labour hire and subcontracting arrangements.
- Providing input into modern slavery-related questions for a draft supplier assessment questionnaire being developed by an overseas government for its suppliers.
- Discussing learnings from a supplier mapping project undertaken by a member organisation. This work considered the supply chains of bitumen and the prevalence and nature of modern slavery and considered how to manage risks.
- Discussing members' on-site worker checks to inform modern slavery due diligence efforts, including training, checking ID documents, and white card requirements.
- Sharing a member's experience undergoing an audit process focused on promoting safe and fair working conditions and responsible social and environmental management.
- Providing regular updates to members on key global and local developments relating to modern slavery and broader human rights.

¹ All external engagement initiatives are conducted in accordance with applicable laws and regulations, including the Competition and Consumer Act 2010 (Cth)

Approval

Consultation

We operate with overarching policies, systems and approaches that are designed to be consistently applied across each of the entities comprising Transurban. The entities comprising Transurban also have a common Procurement Team. In preparing this Statement, Transurban has communicated with relevant entities across the group to frame expectations, increase awareness, inform our disclosure in this statement and strengthen our approach to addressing modern slavery risks. This has included seeking input from our ongoing Sustainable Procurement Business Leadership Group for modern slavery risk management, which includes representatives from across a broad range of functions who have responsibilities across the Reporting Entities covered by this statement and their owned or controlled entities (including major projects, operations, sustainability, social licence, finance, people and culture, health, safety and environment, procurement, risk and legal).

The Procurement Team presented to the Boards of Transurban, Parent Group the Transurban Queensland Group and the Airport Motorway Group on the status of relevant procurement practices and the preparation of this Statement under the Act. This Statement has also been reviewed by the Executive Committee of Transurban, and executive representatives from the Transurban Queensland Group and the Airport Motorway Group, prior to being put to the relevant group boards for review and final approval. This joint Statement was approved by the following Boards of Directors (as the 'higher entity' for the Reporting Entities within each business group within the meaning of the Act):

- The Board of THL, TIL and TIML as the responsible entity for THT for the Transurban Parent Group on 2 December 2025
- The Board of Transurban Queensland Holdings 1 Pty Limited for the Transurban Queensland Group on 27 November 2025
- The Board of Airport Motorway Holdings Pty Limited for the Airport Motorway Group on 3 December 2025



Michelle Jablko

Chief Executive Officer



Craig Drummond

Chair, Transurban Group

As a responsible member of the Transurban Parent Group



Deborah O'Toole

Chair, Transurban Queensland

As a responsible member of the Transurban Queensland Group



Nicole Green

Chair, Airport Motorway Holdings Pty Limited

As a responsible member of the Airport Motorway Group

Appendix A

Reporting Entities

This Modern Slavery Statement has been prepared as a joint statement on behalf of the following **Reporting Entities**:

- Transurban Holdings Limited ACN 098 143 429 (THL)
- Transurban International Limited ACN 121 746 825 (TIL)
- CityLink Melbourne Limited ACN 070 810 678
- Interlink Roads Pty Limited ACN 003 845 430
- M5 Holdings Pty Limited ACN 073 922 620
- Sydney Roads Limited ACN 119 323 901
- The Hills Motorway Limited ACN 062 329 828
- Transurban Sun Holdings Pty Limited ACN 169 039 776
- Transurban WGT Co Pty Ltd ACN 617 420 023
- LCT-MRE Holdings Pty Limited ACN 145 311 477
- LCT-MRE Pty Limited ACN 143 401 870
- Tollaust Pty Limited ACN 050 538 693
- Transurban Infrastructure Management Limited ACN 098 147 678 as responsible entity of the Transurban Holding Trust and trustee of the Citylink Trust
- Hills Motorway Management Limited ACN 064 687 645 as trustee of the Hills Motorway Trust
- Transurban Sun Nominees Pty Ltd ACN 169 039 687 as trustee of the Transurban Sun Holdings Trust
- Transurban Finance Company Pty Ltd ACN 098 539 452
- Transurban Funding Pty Limited ACN 609 949 331
- Transurban Collateral Security Pty Ltd ACN 097 586 797 as trustee of the Transurban Finance Trust
- Transurban Limited ACN 098 143 410

Together, referred to as the **'Transurban Parent Group'**

- Transurban Queensland Holdings 1 Pty Limited ACN 169 090 804
- APL Co Pty Limited ACN 609 262 615
- APL Hold Co Pty Limited ACN 609 262 624
- Gateway Motorway Pty Limited ACN 010 127 303
- Logan Motorways Pty Limited ACN 010 704 300
- QML Hold Co Pty Limited ACN 165 802 004
- Queensland Motorway Holdings Pty Limited ACN 150 265 197
- Queensland Motorways Pty Limited ACN 067 242 513
- Transurban Queensland Invest Pty Limited ACN 169 090 733 as trustee of the Transurban Queensland Invest Trust
- Transurban Queensland Finance Pty Ltd ACN 169 093 850
- Transurban Queensland Property Pty Ltd ACN 169 093 878 as trustee of the Transurban Queensland Property Trust
- TQ APL Hold Co Pty Ltd ACN 609 390 507 as trustee of the TQ APL Hold Trust
- TQ APL Asset Co Pty Ltd ACN 609 390 454 as trustee of the TQ APL Asset Trust

Together, referred to as the **'Transurban Queensland Group'**

- Airport Motorway Holdings Pty Limited ACN 078 322 531
- Airport Motorway Pty Limited ACN 057 283 093

Together, referred to as the **'Airport Motorway Group'**

For more information on the Transurban roads and projects managed by the Reporting Entities outlined above, see our [FY25 Corporate Report](#)

Appendix B

Program key tracking metrics

Tracking and effectiveness criteria	Area	Indicator description	FY25	FY24	FY23	FY22
Are we increasing the visibility of our business and supply chains?	Operations	Transurban Reporting Entities	34	21	21	19
		Transurban operating sites and office locations	25	25	22	22
		Operating countries	Australia, US, Canada	Australia, US, Canada	Australia, US, Canada	Australia, US, Canada
	Supply chain	Direct workforce	4100+	4,100+	3,900+	3,600+
		Full-time employees	1750+	1,900+	1,750+	Not reported
		Part-time employees	90+	115+	Not reported	Not reported
		Supplier locations (countries)	16	14	14	18
		Supply chain managed spend (\$AUD)	Over \$1.55b+	Over \$1.75b+	Over \$1.8b+	Over \$1.3b+
		Tier 1 supplier count (directly engaged)	1300+	1,500+	1,600+	1,600+
		Tier 2+ supplier count (indirectly known)	500+ identified	275+ identified	150 identified	Not reported
		Social enterprises and First Nations suppliers (direct and indirect)	210+ identified	160+ identified	100+ identified	Not reported
		New and alternate suppliers used in this period compared with previous period	~365	~380	~450	~500
		Major categories of spend	91% of total spend (major projects, operations and maintenance, professional services, technology and customer services)	84% of total spend (major projects, operations and maintenance, professional services and technology)	84% of total spend (major projects, operations and maintenance, professional services and technology)	82% of total spend (major projects, operations and maintenance, professional services and technology)
		Spend with Australian suppliers	92%	91%	90%	84%

Tracking and effectiveness criteria	Area	Indicator description	FY25	FY24	FY23	FY22
Are we understanding our risks?	Risk assessment resources	Tools and materials used to inform our risk assessments	- Global Slavery Index 2023 - US TIP Report - US Child and Forced Labour Reports - Human rights materials - Supplier evaluations - Internal expertise - Desktop assessments - Modern slavery register - Industry groups, supplier engagement and pilot programs	- Global Slavery Index 2023 - US TIP Report - US Child and Forced Labour Reports - Human rights materials - Supplier evaluations - Internal expertise - Desktop assessments - Modern slavery register - Industry groups, supplier engagement and pilot programs	- Global Slavery Index 2018 - US TIP Report - US Child and Forced Labour Reports - Human rights materials - Supplier evaluations - Internal expertise - Desktop assessments - Modern slavery register - Traceability pilot	- Global Slavery Index 2018 - US TIP Report - US Child and Forced Labour Reports - Human rights materials - Internal expertise - Desktop assessments - Modern slavery register
	Operations	Entities with employees	4	4	4	4
		Operations risk assessment	Low	Low	Low	Low
		Employees who are visa holders	203	205	125	71
		Employees where English is a second language	23%	21%	Not reported	Not reported
		Casual employees	3	17	32	25
		Employees under EBAs or awards	2%	4%	Not reported	Not reported
	Supply chain	Entities with supply chains	41	44	41	Not reported
		Spend with suppliers in countries where we operate	99%	99%	99%	99%
		High-risk spend categories	- Cleaning (non-roadside) - Promotional items - Construction materials - Labour	- Cleaning (non-roadside) - Promotional items - Construction materials	- Cleaning (non-roadside) - Promotional items - Construction materials	- Cleaning (non-roadside) - Promotional items - Construction materials
Additional priority spend categories		- PPE - Technology and ITS	- Physical security services - PPE - Technology	- Physical security services - PPE	Not reported	

Tracking and effectiveness criteria	Area	Indicator description	FY25	FY24	FY23	FY22
Are we improving how we (and our suppliers) address our modern slavery risks through ongoing due diligence?	Policies	Operational policies	- Human Rights Policy - Code of Conduct - Sustainability Policy - Employee Policy Handbook (US) - Whistleblower Policy - Anti Bribery, Corruption and Fraud Policy - Anti-Money laundering Policy - Diversity and Inclusion Policy - Procurement Policy - Employee Policy Handbook (Quebec)	- Human Rights Policy - Code of Conduct - Sustainability Policy - Employee Policy Handbook (US) - Whistleblower Policy - Anti Bribery, Corruption and Fraud Policy - Anti-Money laundering Policy - Diversity and Inclusion Policy - Procurement Policy - Employee Policy Handbook (Quebec)	- Human Rights Policy - Code of Conduct - Sustainability Policy - Employee Policy Handbook (US) - Whistleblower Policy - Anti Bribery, Corruption and Fraud Policy - Anti-Money laundering Policy - Diversity and Inclusion Policy - Procurement Policy - Employee Policy Handbook (Quebec)	- Human Rights Policy - Code of Conduct - Sustainability Policy - US Employee Handbook - Whistleblower Policy - Ethical Business Practices Policy - Diversity and Inclusion Policy - Procurement Policy
		Supply chain policies (some operational policies also apply to suppliers)	- SSCoP - Supply chain remediation guidelines	- SSCoP - Supply chain remediation guidelines	- SSCoP - Supply chain remediation guidelines	- SSCoP - Supply chain remediation guidelines
	Due diligence	Suppliers triaged through high-risk onboarding process	39	32	3	3
		Supplier due diligence evaluations completed (across 24-month cycle)	300+	200+	70	44 (third-party digital pilot tool)
		Priority supplier due diligence evaluations completed (across 24-month cycle)	149	80	48	<i>Not reported</i>
		Suppliers identified using migrant labour	40	45	10	<i>Not reported</i>
		Suppliers identified using labour hire	32	53	19	<i>Not reported</i>
		Assessed suppliers identified providing workers access to grievance mechanisms	65%	60%	31%	<i>Not reported</i>
Are we doing our part to raise awareness of modern slavery by collaborating with suppliers and industry partners?	Mandatory learning – operations	Direct workforce modern slavery eLearning completion	2377	2066	1875	<i>Not reported</i>
	Specialised training	Tailored Contract Management, TCRO, IRC, procurement and supplier staff training sessions	3	11	5	2
Do potential or actual affected stakeholders have access to, and trust mechanisms to raise concerns and do they have access to remedy?	Grievances and remedy	Total reportable conduct issues raised (all feedback mechanisms)	1	13	2	7
		Reportable conduct issues relating to Labour rights, working hours, wages ¹	0	0	0	0
		Modern slavery remediation provided	Not applicable	Not applicable	Not applicable	Not applicable

¹ International Labour Office, *Indicators of Forced Labour*.

Appendix C

Mandatory reporting criteria

	Reference in this statement	
	Section	Page
Identify the reporting entity	Inside cover	2
	Appendix A	24
Describe the reporting entity's structure, operations and supply chains	Our structure and operations	4
	Our supply chain	7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern slavery risks	10
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Our approach	12
	Our due diligence	15
	Case study	17
	Measuring effectiveness	21
	Collaboration and industry engagement	22
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring effectiveness	21
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	Consultation	23
	Approval	23
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Training and capacity building	19
	Collaboration and industry engagement	22

Australia Melbourne (Head office)

Tower Five, Collins Square
Level 31, 727 Collins Street
Melbourne, Victoria 3000

Sydney

Level 12, 210 George Street
Sydney, New South Wales 2000

Brisbane

Level 39, 300 George St
Brisbane, Queensland 4000

Mailing address

Locked Bag 28
South Melbourne, Victoria 3205

Phone +61 3 8656 8900
Fax +61 3 8656 8585

North America

Transurban (USA) Inc.
Suite T500, 7900 Westpark Drive
Tysons, VA 22102

Phone +1 571 419 6100

General enquiries

Email corporate@transurban.com
transurban.com

