

# Modern Slavery Statement

## 1.0 Introduction

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

Ventura takes a zero-tolerance approach to any form of human rights abuses as defined in Section 4 of the Commonwealth *Modern Slavery Act 2018* in our operations and supply chains.

Ventura has produced this Modern Slavery Statement for the reporting period 1 July 2022 to 30 June 2023 in line with the requirements of the *Modern Slavery Act 2018*.

## 2.0 Our Structure

Ventura Motors Pty Ltd ABN 67 004 235 518 ('Ventura') is a privately-owned Australian company registered in Dandenong, Victoria, Australia. Ventura Motors 100% owns and controls 10 active entities for the purposes of bus operations, mechanical support, people management, property, and finance. The entities covered by this statement:

Entity name	ABN
Ventura Transit Pty Ltd	ABN 68 153 091 680
Ivanhoe Bus Company Pty Ltd	ABN 57 004 367 962
Invicta Bus Services Pty Ltd	ABN 44 134 696 558
Peninsula Transit Pty Ltd	ABN 64 153 091 662
Portsea Passenger Services Pty Ltd	ABN 51 004 237 450
US Bus Lines Unit Trust	ABN 74 622 621 199
Barrie Warren Unit Trust	ABN 99 425 365 630
Moorabbin Transit Unit Trust	ABN 24 037 825 151
Ventura Property Management Pty Ltd	ABN 28 100 908 049
Eastcoast Truck & Bus Services Centre's Pty Ltd	ABN 12 004 285 518



## 2.1 Our Operations

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

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

- Department of Transport and Planning (DTP) route, on demand and school services
- Department of Education & Training (DET) services
- Emergency Tram and Rail replacement services
- Shuttle Services
- Charter Bus Services
- Private School Charter Bus Services
- Night Network Bus Services
- Coach Services



## 2.2 Our Supply Chain

To deliver our services, Ventura has a well-established extensive network of suppliers and contractors providing products and/or services. Our supply chain is diverse in terms of the types of products and services that we procure. Most of these supplier relationships are long term, well established and services are mostly Victorian based. Our procurement activities are split into categories of capital purchases, provision of goods & services and professional services.

### Capital purchases



- Buses and vehicles
- Property
- Major project works

### Goods and services



- Fuels & oils
- Tyres
- Parts & Tools
- Parts & Tools services
- Uniforms and PPE
- Utilities
- Cleaning products & service
- IT Software and Hardware
- Bus & vehicle repairs/service
- Depot maintenance services
- Subcontractor Bus Services

### Professional services



- Financial services
- Legal services
- Projects services
- Administration services
- IT consultant services
- Regulator services

### 3.0 Risks of Modern Slavery in our Operations

As Ventura only operates in Victoria, the risk of causing or contributing to modern slavery through the use of labour is considered a low geographical risk. There have been no changes in the activity of Ventura's operations from previous reporting periods with the current risk of Modern Slavery remaining low as all employees are covered under employment agreements underpinned by an Enterprise Bargaining Agreement ('EBA') and/or National Employment Standards ('NES').

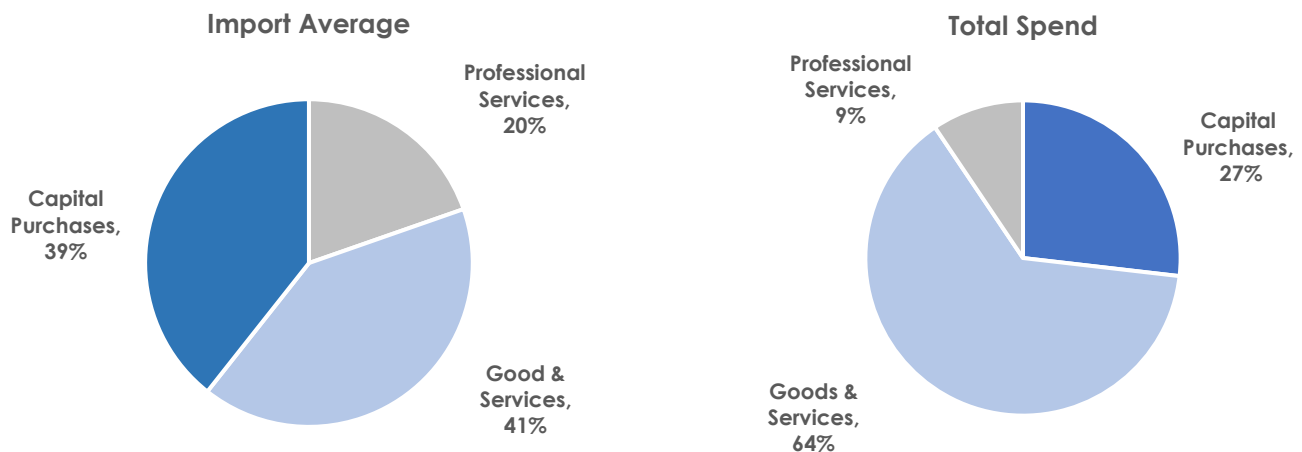
### 3.1 Risks of Modern Slavery in our Supply chains

Ventura has contractual agreements with the Victorian State Government to prioritise and promote local employment and business opportunities. After a review of our suppliers for each financial year, Ventura identified a significant number of suppliers of products and services operate in Victoria and subject to NES, therefore considered a low geographical risk of modern slavery practices.

Contractors who perform work for Ventura are not directly employed, managed and controlled by Ventura. Because of the nature of the contractor relationship, Ventura has limited visibility or control of all working conditions for workers or employees in the contractor's supply chain.

After review of the Global Slavery Index 2023 Ventura recognises the purchasing of products and materials such as fuels and oils, some bus body and chassis, parts, tyres, uniforms, IT software and hardware are sourced from international suppliers thus being a higher geographical risk. While Ventura can and does conduct due diligence activities for these suppliers, there is relatively less visibility and influence over its operations. We continue to establish strong relationships with our supplier network to gain understanding of our supply chains.

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



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

### Policies and Procedures

Ventura has developed a Modern Slavery Policy that sets out Ventura's position against modern slavery. This policy applies to all Ventura companies, employees within Ventura, and we expect contractors, subcontractors, and suppliers to apply similar standards. Other Ventura policies and standards are continuously updated to directly influence our behaviours towards Modern Slavery and include:

#### Ventura Code of Conduct

Ventura's Code of Conduct standards are a to guide to the ethical and legal responsibilities we share as employees of the Ventura Group.

#### Ventura Whistle-blowing Policy

To encourage employees and contractors to disclose any malpractice or misconduct of which they become aware, and to provide protection to employees who report allegations of such malpractice or misconduct.

These policies and standards have been enhanced to establish an ethical culture and environment which will not tolerate human slavery or abuse to enter Ventura's operations or supply chain. Policies and Procedures are reviewed annually through the Procurement Committee and Executive Management Team.

### Review of operations and supply chains

As Ventura engages a large network of suppliers to deliver our services, a "Preferred Supplier" listing has been developed for each procurement activity to minimise the risk of Modern Slavery practices through our supply chains. The following considerations are accounted for during the selection process of preferred suppliers:

- General company information
- Insurances
- Management System Certification
- Competency and training of staff
- Policies and Procedures
- Risk Management
- Subcontractor management
- Audits
- Local Employment and content commitment
- Modern Slavery Commitment

## Supplier Questionnaire

Ventura have utilised the Australian Government's Procurement Toolkit to develop a Supplier Questionnaire which will seek ongoing confirmation that our current suppliers are acting in accordance with Ventura's Modern Slavery Policy. The Questionnaire is used to assess our suppliers' policies and practices to identify, assess and mitigate modern slavery risks in their supply chains and operations.

Ventura's Supplier Questionnaire is distributed annually to those suppliers deemed high risk and if a supplier fails to confirm they are acting in accordance with the Ventura's Modern Slavery Policy this may result in termination of their supplier contract. During reporting period July 2022 to June 2023 there were no complaints of actual or suspected modern slavery practices throughout Ventura's Operations and supply chains.

## Training

Breaches of the above-mentioned policies is dependent on our employees identifying and reporting these potential breaches. Therefore, it is vital that our employees are aware of what human rights and modern slavery issues are. To ensure awareness for our employees, In March 2023 Ventura's Leadership team completed a training discussion on the topic of Modern Slavery. Ventura used the opportunity to educate our site and department leaders on definitions of modern slavery, how to identify risks and practices of modern slavery and Ventura's commitment to minimising the risk of modern slavery practices through our supply chain.

Ventura's Procurement Committee members are responsible for managing supplier and contractor relationships for all procurement activities. The Committee includes members from key business areas including Operations, Fleet, Procurement, Human Resource, Finance, Safety, and Compliance. Ventura's Procurement Committee members have been trained to identify and act upon risk in day-to-day operations and through our supply chain.

Where there is potential modern slavery practices identified, the Ventura Representative will complete the following process:

- Contact the Australian Federal Police (AFP) immediately on 131 237
- Not engage further with the supplier on the allegation;
- Not attempt to further investigate or verify the allegation as the AFP are best placed to do this; and
- Continue to work with suppliers to raise awareness and build capacity where possible.
- In the event of repeated non compliance events, Ventura may terminate contracts and agreements with the Supplier or Contractor

## 5.0 Assessment and effectiveness of our actions and future focus

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

Ventura's Procurement Committee meet quarterly and have a standard agenda item to discuss actions taken and their effectiveness in relation to modern slavery risks.

## 2023/2024 Objectives

This statement complies with the Australian Modern Slavery Act 2018. The Act was reviewed in May 2023 and 30 recommendations for change were made, including:

- Amendments to the Act, such as the threshold and scope of entity reporting
- Introduction of penalties for specific non-compliance
- Expanding guidance material
- The role of the Anti-Slavery Commissioner in relation to the Act.

Ventura look forwards to and will comply with, any amendment to the Act. The key recommendations in relation to reporting have been taken into consideration when planning our 2023/2024 financial year objectives. In 2023/2024 reporting period, Ventura will undertake the following processes to ensure continuous improvement in our Modern Slavery due diligence processes, awareness, and procurement framework:

### Improvement to our Review of Supply Chain processes

In January 2024 Ventura will complete an updated mapping exercise with our current suppliers and contractors based off results from the Supplier and Contractor Questionnaire 2023 and develop an updated Risk Profile. Each high spend supplier and contractor will be allocated a Risk Rating (Low, Medium, High) based on the following considerations:

- Sector and Industry risks
- Product and Services risks (Global Slavery Index)
- Geographic risks (Global Slavery Index)
- Supply Chain Model risks
- Responses to Supplier and Contractor Questionnaire

Risk ratings will be monitored and form part of Ventura's annual supplier and contractor evaluation process.

### Evaluation and Selection - Suppliers and Contractors

Ventura's aim for 2023/2024 financial year is to further capture organisation's position against modern slavery during the selection process for new suppliers and contractors. Ventura will implement a Pre-evaluation Questionnaire and a risk screening tool to our procurement framework for any potential suppliers and contractors. These processes will assist our Procurement Committee in understanding the general scope of modern slavery risks that the contract/purchase may carry.

If the supplier or contractor are approved as a preferred supplier, they will receive an initial risk rating. The risk rating and Pre evaluation Questionnaire responses will act as a benchmark for ongoing monitoring. Each year suppliers and contractors will complete the Annual Questionnaire as mentioned above and responses will form part of annual supplier and contractor evaluations.

#### Development of Supplier and Contractor Handbook

In 2023/2024 financial year, Ventura will focus on awareness to our suppliers and contractors on Ventura's position against modern slavery. Ventura will develop a Supplier and Contractor Handbook that outlines the ethical and legal responsibilities we expect from any organisation providing goods or services to Ventura. Relevant Policies and Procedures relating to Human Rights, Child Safety, Occupational Health and Safety, behaviours and Modern Slavery Policy will be embedded within the Handbook.

#### Training/eLearning

As mentioned above, it is vital that our employees are aware of human rights and modern slavery issues and the risks to our industry. Ventura will utilise the eLearning modules and administrative guidance made available on the Attorney-Generals Department Resources webpage. Annual refresher training modules will be set up for our Procurement Committee to complete with the aim of initiating discussions around potential opportunities for mitigating risks in our supply chains specifically.

#### Development of Modern Slavery Protocol

In 2023/2024 Ventura will develop a Modern Slavery Reporting Protocol to describe the steps to report suspected instances of modern slavery exploitation at a local or international level. After review and approval from the Procurement Committee and Board, the Protocol will be embedded within the Supplier and Contractor Handbook and communicated to the workforce.

### **6.0 Consultation with other entities**

Each entity owned or controlled by Ventura Motors Pty Ltd as outlined in section 2.0 of this statement is governed by the same management team and board of directors. There is shared governance of policies and procedures in respect of identifying and assessing modern slavery risk for all entities.

As such, the development of this statement was made in collaboration and consultation with the Management Team who have an oversight of all reporting entities operations and activities. The Ventura Management Team include personnel from key business areas such as Operations, Fleet, Procurement, Human Resource, Finance, Safety, and Compliance.

### **7.0 Approval**

This Statement was approved by the Ventura Board of Directors on the 29<sup>th</sup> November 2023 and is signed by Andrew Cornwall as the Managing Director for all entities covered in this statement.



**Andrew Cornwall**  
**Managing Director**