



## Chairman's Foreword

NorthWestern Roads Group has continued to embed responses to modern slavery risks into its operations throughout the reporting period. Myself and my fellow Directors are pleased that NWRG continues to approach modern slavery risks in a practical and planned manner.

## Purpose of Statement

This Modern Slavery Statement (**Statement**) is made on behalf of NorthWestern Roads Group Pty Ltd (ACN 169 328 330); NorthConnex Company Pty Ltd (ACN 602 719 513); NorthWestern Roads Group Nominees Pty Ltd as trustee for the NorthWestern Roads Group Trust (ACN 169 328 287); and Westlink Motorway Group (ACN 102 757 924). All of these entities are part of NorthWestern Roads Group (**NWRG**, "we", "our"). NWRG is owned by QIC Private Capital Pty Limited on behalf of its managed clients, Canada Pension Plan Investment Board (trading as CPP Investments) and Transurban Limited [ABN 96 098 143 410].

NWRG operates the Westlink Motorway in western Sydney and the Northconnex Tunnel in the north west of Sydney.

This Statement is the second made by NWRG under the *Modern Slavery Act 2018* (Cth) (the **Act**). This Statement sets out the actions taken by NWRG to identify, assess, and address modern slavery risks across our operations and supply chains in the twelve months ending 30 June 2021.

## Contents

Snapshot of NWRG’s work in this reporting period.....	3
NWRG’s Commitment.....	3
Our joint reporting entities under the Act.....	3
NWRG’s structure, operations and supply chain.....	4
Structure and Operations .....	4
Supply chain .....	4
Risks of modern slavery in NWRG’s operations and supply chain.....	4
Actions taken by NWRG to assess modern slavery risks .....	4
Description of modern slavery risks.....	5
NWRG’s actions to reduce modern slavery risks.....	6
Policy and Governance.....	6
Supplier engagement.....	6
How we assess our effectiveness.....	8
Future actions .....	8
Consultations with reporting entities .....	9
Disclaimer and approval .....	9

### Snapshot of NWRG's work in this reporting period

In this reporting period, NWRG has continued to work closely with entities in its group and its suppliers to identify and address modern slavery risks. We have achieved the following goals set in our workplan for the reporting period:

- Developed and begun implementation of a Supply Chain Modern Slavery Remediation Guideline;
- Conducted awareness sessions with NWRG staff on the application of the Remediation Guideline, standard modern slavery contractual clauses and the Supplier Code of Conduct;
- Worked with merchandise suppliers to examine their approach to modern slavery risk;
- Reviewed the reporting statements of key suppliers to understand how these entities are addressing modern slavery risks;
- Conducted routine engagement with key suppliers to further understand what action is being undertaken within their organisation to address modern slavery risks; and
- Provided the Supplier Code of Conduct to new suppliers or those renewing contracts.

### NWRG's Commitment

NWRG supports the goals and intent of the Act and is committed to identifying and addressing any risks or impacts of modern slavery in our operations and supply chains. We recognise our role in respecting and promoting the fundamental human rights of workers, suppliers and customers. We have committed, through our Sustainability Policy, to work with our partners to advance our procurement practices to align with the International Guideline for Sustainable Procurement (ISO 20400) and relevant local and international regulations pertaining to human rights practices including modern slavery.

We are committed to continuous improvement of our identification of modern slavery risks and reporting program.

We continue to work with all of our stakeholders and suppliers to further embed controls to effectively identify and manage modern slavery risks within our business operations and supply chains.

### Our joint reporting entities under the Act

This joint statement is made on behalf of the following entities within NWRG which are reporting entities for the purposes of the Act, as they are companies that carry on business in Australia (see section 21 of the *Corporations Act 2001 (Cth)*) with a consolidated revenue of over \$A100 million, during the reporting period:

- NorthWestern Roads Group Pty Ltd (ACN 169 328 330);
- NorthConnex Company Pty Ltd (ACN 602 719 513) (Referenced henceforth as 'NorthConnex Tunnel');
- NorthWestern Roads Group Nominees Pty Ltd as trustee for the NorthWestern Roads Group Trust (ACN 169 328 287);
- Westlink Motorway Group (with the deemed parent WSO Co Pty Ltd ACN 102 757 924). (Referenced henceforth as 'Westlink Motorway')

For the purposes of this statement, '**NWRG**' refers to all entities within the Group, and "**reporting entities**" refers to the entities listed above.

## NWRG's structure, operations and supply chain

### Structure and Operations

NWRG operates the Westlink Motorway in western Sydney and NorthConnex in the north west of Sydney. More information on each motorway can be found at [www.WestlinkM7.com.au](http://www.WestlinkM7.com.au) and [www.Northconnex.com.au](http://www.Northconnex.com.au).

NWRG does not directly employ staff but has a Management Services Agreement with NorthWestern Roads Management Services Company (NWR) through which NWR's employees provide services for the Group. NWR employs 21 Australian-based professional staff who manage the two toll roads on behalf of NWRG through the oversight of contractors who perform operations and maintenance services for the Westlink Motorway and project delivery services overseeing construction for NorthConnex until October 2020 when the asset opened, and in operations and maintenance from that date.

### Supply chain

NWRG has a limited supply chain, dominated by agreements with Tier 1 suppliers who are well-established, large companies, many of whom are ASX-listed. This is summarised below.

#### ***Supply chain for Westlink Motorway***

The following providers represent the overwhelming majority of NWRG's total spend in operating the Westlink Motorway:

- Operations and Maintenance Contractor (reports separately under the Act);
- Tolling and Customer Management Services Contractor (reports separately under the Act);
- Roadside Tolling Equipment and Services Contractor; and
- Operational Management and Control Systems (**OMCS**) Provider (reports separately under the Act),

Three of the four Key Westlink Motorway suppliers listed above are themselves reporting entities under the Act and so will be undertaking their own assessment of their modern slavery risks and reporting as required by the Act. The remainder of NWRG's supply chain, which makes up a small proportion of its overall spend, consists of professional services within Australia and office technology and supplies.

#### ***Supply chain for Northconnex Tunnel***

In FY21 NorthConnex was under construction and opened in late October 2020. Construction was delivered through a design and construction contract with two Australian-based companies (one also being a supplier for the Westlink Motorway). Both of the companies are required to report under the Act.

In operations, a single head contractor will operate and maintain NorthConnex for NWRG.

## Risks of modern slavery in NWRG's operations and supply chain

### Actions taken by NWRG to assess modern slavery risks

In order to prepare a baseline measurement of modern slavery risk for our 2020 Statement, the Group engaged a specialist consultancy to conduct a detailed assessment process. Details of this assessment can be found in the 2020 statement.

This assessment found that, as our primary suppliers are large organisations providing skilled labour within Australia, the risk of modern slavery in NWRG's supply chain is generally low. NWR continues to engage with its Tier 1 suppliers to develop its understanding of modern slavery risks in its Tier 2 and lower supply chains, as detailed below. NWRG seeks to address its supply chain risks by seeking detailed information from key suppliers. As the NWRG supply chain did not materially change over the last 12 months, our modern slavery risks have not changed materially.

A number of our key suppliers have submitted modern slavery statements under the Act. We have reviewed these Statements to confirm that these suppliers understand, and are introducing and strengthening measures to address, modern slavery risk. We expect that these actions would have a positive impact on our supply chain risk.

#### Description of modern slavery risks

As our operations and supply chain did not materially change during the reporting period, our view is that the risk assessment performed to support our 2020 statement remains accurate. Accordingly, our risk profile remains as detailed in our 2020 statement which can be found here - <https://modernslaveryregister.gov.au/statements/file/7702897e-cf32-4f5a-b35d-0ad255adb2f3/>

By way of summary, we note that our 2020 risk assessment identified a moderate risk of modern slavery (the highest level of risk identified in the assessment) within the following products and services within NWRG's extended supply chain:

- Merchandise;
- Design & Construction activities associated with the construction of NorthConnex;
- Tolling system equipment supply;
- Customer care services provision from overseas (a relatively higher risk country); and
- OMCS system supply.

Our 2020 risk assessment also identified the following key drivers of risk:

- Long or complex supply chains associated with raw materials and equipment;
- Equipment and materials supplied or manufactured in low cost countries;
- Low-skilled workforce involved in the manufacture of tolling and OCMS equipment, merchandise and office supplies, outside Australia.

#### ***Impact of COVID-19 pandemic***

The risk of modern slavery in NWRG's Australian operations has not been substantially impacted by the ongoing effects of the COVID-19 pandemic throughout the reporting period compared to 2020.

The social and economic disruption described in our 2020 statement continues to pose human rights risks, including modern slavery risks, which are relevant to our supply chain. These include concerns about workplace safety, and impacts to migrant workers and workers in low-skilled industries. Where possible during this reporting period, NWR staff met in person with NWRG's key suppliers to ensure oversight of their operations and open communication. Where in-person meetings were impossible due to COVID-19 restrictions, we also used virtual meetings, virtual safety walks and other technological solutions to maintain a normal level of engagement with and oversight of suppliers and their subcontractors.

## NWRG's actions to reduce modern slavery risks

On the basis of the risk assessment referred to above, NWRG continued to action identified risks of modern slavery in its supply chain.

### Policy and Governance

In the current reporting period NWRG developed a ***Supply Chain Modern Slavery Remediation Guideline*** which will complement our existing policies, including our Supplier Code of Conduct, Sustainability Policy, Code of Conduct and Whistle-blower Policy. The guideline outlines the steps and processes NWRG are to follow should an instance of modern slavery be identified within the NWRG supply chain. These steps would include direct engagement with the relevant supplier, as appropriate and in liaison with relevant authorities; imposing additional contractual requirements to address risk; and re-evaluating the supplier relationship.

This guideline has been communicated to all staff in NWR. All NWR staff were taken through a briefing session explaining the purpose of the remediation guide and how to escalate a report should it be made to a team member from any of our suppliers. At this session, the Supplier Code of Conduct & Sustainability Policy were also discussed to re-enforce how NWR staff should understand and apply them to minimise modern slavery risk.

### Supplier engagement

Given NWRG's role as an asset owner, our approach to addressing modern slavery risks focuses on proactively liaising with our key suppliers in order to understand the processes they have in place to address modern slavery risks in their operations and supply chains.

In this reporting period, NWRG established routine meetings with its key Tier 1 suppliers (our Operations and Maintenance Contractors, Technology and Customer Management Services provider and Tolling Services Provider) on the Westlink M7 and NorthConnex, building on discussions in our first reporting period. Engagement involved both informal discussions and formal audit and assurance programs across a range of risks, including subcontractor and supply chain management. It also included presentations from our key suppliers on how they are advancing modern slavery practice within their procurement processes. During the reporting period NWRG sought information on how these suppliers are further embedding measures to mitigate modern slavery risk through their procurement and contractual processes. Three of our four major suppliers are reporting entities under the Act. Further, our two major suppliers are members of the 'Modern Slavery Road Construction Industry Coalition' coordinated through the Infrastructure Sustainability Council. NWRG will monitor the progress and outputs from this group and look to apply relevant practices within NWRG's operations.

Finally, we continued to ensure that material suppliers were onboarded to updated contracts containing modern slavery clauses and requirements to comply with the Supplier Code of Conduct at renewal. This included onboarding a key information technology support supplier to this updated contract template.

In future reporting periods, NWRG will address risks associated with its suppliers of professional services and office supplies. Given that these suppliers make up only a small proportion of its overall spend, NWRG has focused in its first two reporting periods on continued engagement with our Key Suppliers to both projects, as detailed above.

**Case Study: targeting modern slavery in merchandise procurement**

Our 2020 risk assessment identified merchandise suppliers as an area of relatively higher risk in our supply chains.

In this reporting period, NWRG has worked with existing merchandise suppliers to understand how they are addressing modern slavery risk within their supply chain. NWRG appreciates that these businesses are not reporting entities, and some are small entities with limited ability to influence their own supplier base. Nevertheless, we have requested information on what they are doing to assess and address risks of modern slavery, which these suppliers have now provided. It is apparent that these smaller entities are commencing their own reviews to respond to queries from customers, which is a positive outcome. We will continue to analyse the information provided by our suppliers and work with them as they enhance their own supply chain engagement.

In order to assess what “best practice” looks like, NWRG has also researched and engaged with a larger supplier in the merchandise procurement industry which has a more developed approach to mitigating modern slavery risk in its supply chain. NWRG will, where appropriate use feedback from this company to educate its own suppliers and guide their risk mitigation efforts.

### How we assess our effectiveness

NWRG recognises the importance of evaluating the effectiveness of actions taken to combat modern slavery during each reporting period. To assess the effectiveness of the measures we have introduced and, we will continue to improve the following:

- Regular and productive meetings with our key suppliers to understand progress on mitigating modern slavery risk and share best practice;
  - In this reporting period 4 meetings were held with key suppliers where our suppliers provided NWR with updates on their actions in relation to modern slavery
- Responses to requests for information and feedback from smaller suppliers on their understanding and actions to address modern slavery risk;
  - Two suppliers contacted provided their written approach to sustainable procurement, including modern slavery
- Ongoing staff training (as required) and feedback on relevant internal and external policies;
  - 100% of staff provided with awareness training on modern slavery
- Ongoing monitoring of modern slavery risks, including follow-up risk assessments as required;
  - The above is planned for in key projects in FY22. There were no material changes in risk profile in FY21 compared to FY20.
  - There were no incidents of human rights or modern slavery violations reported to NWR in the reporting period.
- Onboarding and implementation of the Supplier Code of Conduct and contractual modern slavery clauses, as well as feedback received from suppliers.
  - During the reporting period, an existing supplier was transitioned to the new contract template which has been updated to address modern slavery risk. An induction was held to explain the purpose and effect of the modern slavery provisions, including the requirements of the Supplier Code of Conduct.

In future reporting periods, we will refine our approach to measuring effectiveness and consider whether more detailed metrics are necessary.

### Future actions

We recognise the need for the NWRG to continually evolve and enhance its approach to addressing modern slavery risks in its operations and supply chain. To that end, we will seek to continually improve our approach and learn from our industry peers and partners by collaborating on leading practice.

Actions planned for the next reporting period include:

- Reviewing the FY21 modern slavery statements of our suppliers who are reporting entities under the Act to understand their assessment of their risks and their approach to mitigating those risks and apply any relevant practices within NWRG;
- Continuing periodic staff training and awareness raising about modern slavery and our relevant internal and external policies;
- Continuing collaboration with key suppliers to seek evidence that they have put in place their own policies and procedures to address modern slavery risks;
- Continue to onboard suppliers onto the Supplier Code of Conduct for new and renewed contracts;



- Making our remediation process visible and available;
- Implementing revised contracts inclusive of human rights and modern slavery terms; and
- Aligning and benchmarking our modern slavery work plan against our industry partners, seeking to improve our processes and procedures.
- Monitoring the sale of the Westlink Operations and Maintenance provider and reviewing the reporting status and modern slavery framework of any new parent entity.

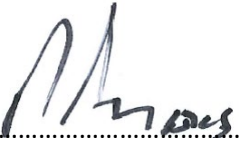
#### Consultations with reporting entities

NWRG is committed to ensuring that all entities within its group are aware of their modern slavery obligations and to developing and maintaining a robust NWRG-wide response to modern slavery. To this end, the Safety, Environment and Stakeholder Manager for NWRG was responsible for co-ordinating the assessment of risks across the four reporting entities within NWRG, and understanding the modern slavery obligations and risks associated with each entity. This involved the Safety, Environment and Stakeholder Manager engaging with the NWRG's shareholders and the board of directors of each entity to explain our approach. The respective Boards have had the opportunity to input into this Statement before its finalisation and have approved this Statement.

#### Disclaimer and approval

The purpose of this Statement is to provide general information only as required by the Act and is correct as at the date of publication.

NorthWestern Roads Group Pty Ltd and NorthWestern Roads Group Nominees Pty Ltd (as trustee for the NorthWestern Group Trust) are the parent companies of the reporting entities within NWRG (including, for the avoidance of doubt, all reporting entities listed in this statement). This Statement was approved by the Boards of the NorthWestern Roads Group, being the principal governing bodies of each of the reporting entities respectively, on 7 December 2021.

A handwritten signature in black ink, appearing to read 'Robin Aldis', is positioned above a horizontal dotted line.

Robin Aldis

Chairman of NorthWestern Roads Group