



Modern Slavery Statement

1 July 2021 to 30 June 2022



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1.1 Reporting Entity

This Joint Modern Slavery Statement (**Statement**) is made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (**the Act**). The Statement covers the reporting period from 1 July 2021 to 30 June 2022 and addresses the mandatory reporting criteria, as required by section 16 of the Act.

The entities covered by this Statement are:

- (a) Bhaajayu Pty Ltd (ACN 084 980 263)
- (b) Busways Australia Pty Ltd (ACN 643 586 225)
- (c) Busways Blacktown Pty Ltd (ACN 000 173 437)
- (d) Busways Camden Pty Ltd (ACN 003 081 230)
- (e) Busways Campbelltown Pty Ltd (ACN 000 572 145)
- (f) Busways Gosford Pty Ltd (ACN 055 471 782)
- (g) Busways North West Pty Ltd (ACN 643 586 770)
- (h) Busways Pacific Pty Ltd (ACN 106 202 340)
- (i) Busways South Australia Pty Ltd (ACN 613 309 185)
- (j) Busways Wyong Pty Ltd (ACN 000 044 726)
- (k) Galbrock Pty Ltd (ACN 078 310 657)

(When referring to all entities, they will be referred to as 'Busways Group').

Busways Group acknowledges it has both a legal and a moral responsibility to promote transparency in its operations. Therefore, we implement procedures specifically focused on reducing the possibility of modern slavery practices existing within our business and our supply chain.

The entities forming part of Busways Group have an annual consolidated revenue of over \$100 million in the financial year from 1 July to 30 June 2022.

1.2 Structure, operations, and supply chains of the Busways Group

1.2.1 Structure

Busways Group is a wholly Australian owned operation. It is beneficially owned by the Rowe family, who are supported by a leadership team that oversees operations, finance, HR and administration for all entities within Busways Group.

1.2.2 Operation

Busways Group is a wholly Australian owned operation. The core business of Busways Group is to provide and operate bus passenger transportation services.

Busways Group is currently contracted by the state governments in New South Wales and South Australia to deliver bus operations. Busways Group has over 1,300 buses operating in 14 contract regions. We delivered services to 60 million passengers in FY22. Busways Group employs over 2,600 employees. The main components of our staff are bus drivers, mechanics and administrative support.

1.2.3 Supply chains

Busways Group is wholly Australian owned, and it only provides services within Australia. As such, all Busways Group's employees are based in Australia.

Busways Group purchases goods and services from suppliers who are almost exclusively Australian based. Busways Group engages with suppliers for tyres, spare parts, fuel and lubricants and other goods and services required to operate its bus fleet. In addition, Busways Group sources and purchases uniforms from external suppliers. For depot construction, refurbishment and maintenance projects, Busways Group engages external companies for materials and services.

A small number of suppliers, who supply specialised consultancy and technical advice to Busways Group, are based in North America.

1.3 Risks of modern slavery practices in the operations and supply chains, and any entities the Business owns or controls

1.3.1 Risk in our operations

From a geographical perspective, Australia is based in a low-risk region. Given the strong legislation and guidance in place, the risks of our operations being directly exposed to modern slavery is low. However, Busways Group is aware that there may be indirect exposure to risks further down our supply chain.

Busways Group has strong visibility over its own employees and complies with Australian workplace laws, including the *Fair Work Act 2009* (Cth), National Employment Standards (NES), and work health and safety legislation. We are confident there are no modern slavery practices within operations directly under our control.

In accordance with various legislation and enterprise agreements currently in place, Busways Group regularly engages with the Transport Workers Union (**TWU**) and the Rail, Tram and Bus Union (**RTBU**) who act in their capacity to represent the interests of their members.

Furthermore, Busways Group seeks external legal advice from specialist employment lawyers and service providers to ensure we meet various legal and social obligations, and our employees receive the correct entitlements. Busways Group is confident that we are not directly causing or contributing to modern slavery practices in our workforce.

We have assessed the risk of modern slavery involving our direct employees to be low. However, we recognise contracted or contingent workers, including those provided by third-party labour hire, may be more vulnerable to modern slavery risks. The greatest potential of this being workers who are lower-skilled, temporary, or migrant workers. This may include workers in areas such as bus and on-premises cleaning, and catering. As part of our commitment to continuous improvement, Busways Group is in the process of requesting Modern Slavery statements and commitments from these identified third-party providers.

1.3.2 Supply chain risks

Busways Group recognises that even though most of our suppliers are based in Australia, some of their products and services may be, partly or wholly, manufactured in other countries in the Asian, North American, and European regions.

Based on the Commonwealth Modern Slavery Act 2018 guidance, we have assessed and identified a small number of high-risk industries in our supply chain. Please refer to the risk assessment and mitigation plans as detailed in Table 1.

Table 1 Risk assessment and mitigation plans

Risk Sector	Geographical risk and industry sector risk	Industry sector risk
Industry	<ul style="list-style-type: none"> Rubber products Textile and uniform ICT and electronics 	<ul style="list-style-type: none"> Cleaning service Catering service Construction service
Risk profile	<p>Above industries have presented high geographic and industry risks according to the Modern Slavery Act. Often industry employs low-skilled workers and offers poor labour conditions. Slavery practices are often present in the production side of operation.</p> <p>In high-risk countries or regions, human rights have been poorly protected, and laws are inadequately enforced. For instance, forced labour is an issue in many high-risk countries and regions where individuals are held in debt bondage. Further, the potential for child labour exists in areas of high poverty.</p>	<p>Above industries tend to employ unskilled and often vulnerable workers such as migrants, backpackers or refugees who may not be aware of their rights under Australian law. The work often occurs outside regular business hours or workers do not receive the legal award rate of pay, superannuation or leave entitlements. They may also be more susceptible to work-related injuries due to poor working conditions that are not adequately regulated by occupational health and safety standards.</p>
Remedial Action	<p>To encourage our suppliers to undertake their own due diligence on their supply chains and manage risks, a Supplier Code of Conduct is issued as part of the supplier onboarding process to ensure that Busways' expectation and suppliers' obligations are properly addressed and followed.</p> <p>In order to maintain a commercial relationship with Busways, all existing and any potential new suppliers are required to complete a comprehensive questionnaire relating to their workforce practices and supply chain. It enables Busways to better assess risks of modern slavery within the supply chain and network. Busways works closely with our suppliers once we have assessed their responses to improve the policies and procedures, as necessary.</p> <p>As more than 75% of Busways' suppliers are small to medium entities, many of them are not required to submit a Modern Slavery Statement themselves, and many of them are unaware of the Modern Slavery Act 2018. Busways intends to publish an information package and guidelines by the end of 2023.</p>	

1.4 Actions by Busways Group to assess and address those risks, including due diligence and remediation processes

During the FY22 reporting period, Busways Group has progressed further with its commitment to raising awareness and identifying and mitigating the risks of modern slavery across our business. The key achievements for FY22 are as follows:

1.4.1 Modern Slavery Committee

The Modern Slavery Committee was established in 2022, with key members from the finance, IT, HR, risk and compliance, procurement, and operations teams. The Modern Slavery Committee holds regular scheduled and documented meetings to share, discuss and develop plans to mitigate modern slavery risks across our operations and supply chain. The committee is in the process of

developing an action plan to be rolled out over the following three years.

Busways Group understands combatting modern slavery is an ongoing process. We will utilise the Modern Slavery Committee forum to continue reviewing and monitoring areas of concern, which will lead to updates of risk assessments within our operations and supply chain.

1.4.2 Internal awareness and education

To raise awareness of modern slavery and understand its present impacts on our society, Busways Group has developed educational materials and training sessions for internal key stakeholders. These training documents outline and summarise information that will equip key staff to:

- Recognise common forms of exploitation identified in the Modern Slavery Act 2018
- Understand the facts and impacts of modern slavery
- Identify signs of modern slavery, both in our operations and our supply chain
- Understand what actions to take if confronted by suspected modern slavery
- Identify our high-level requirements and obligations pertaining to the Modern Slavery Act 2018.

Online training sessions have been taken by members of the Modern Slavery Committee and are in the process of being rolled out to all head office staff. Further training will be given to employees in all remaining departments over the course of the coming year, with priority given to departments specifically working in procurement, supplies, external services and accounts payable.

1.4.3 Incorporate the prevention of modern slavery into our procurement policies and procedures

To raise awareness and create collaboration with companies in our supply chain, Busways Group has incorporated prevention of modern slavery principles into our procurement related policies and procedures. For instance, within the FY22 reporting period, modern slavery related clauses have been included in our Supplier Code of Conduct and Supplier Onboarding Process. Our standards and expectations in relation to reducing and eliminating modern slavery from our supply chain have been clearly articulated in these policies.

Furthermore, we are actively searching for an onboarding solution for new suppliers that will allow us to better monitor and manage the standards of all our suppliers, with the aim of ensuring they, and by default we, meet modern slavery prevention requirements.

As part of the FY23 risk mitigation plan set by the Modern Slavery Committee, Busways Group will continue to identify and assess our current policies and procedures to ensure modern slavery related clauses are properly addressed and included in all our policies and procedures, as appropriate.

1.4.4 A continuous improvement approach to mitigate potential risks within our operation and supply chain

During the current reporting period, the Modern Slavery Committee has engaged with all key stakeholders within the organisation and identified potential high-risk areas within our supply chain. Risk segments are in the process of being analysed and once completed, further controls will be defined, and mitigation actions put in place. Please refer to Table 1.

Busways Group acknowledges that we are in the early stages of identifying and mitigating risks of modern slavery within our operations and supply chain. It is an ongoing and collaborative process, to which we are wholly committed. As such, we will continue to utilise the forum of the Modern

Slavery Committee, taking a continuous improvement approach in building the risk mitigation framework. We look forward to collaborating with more people and entities within our sphere of influence so that we may eliminate any exposure to modern slavery practices within our business and the communities where we work.

1.5 How Busways Group assesses the effectiveness of such actions

For Busways Group employees, we employ payroll specialists to ensure that all employees are paid at the correct rate of pay.

To ensure identified risks are properly managed and mitigation actions are correctly evaluated, Busways Group is in the process of setting up a range of methods to track the effectiveness of our controls.

In key areas, we will set measurable goals that will be monitored and evaluated over certain time periods, giving our Modern Slavery Committee the opportunity to review the effectiveness of our actions. These goals will include, but not be limited to:

- The number of identified high risk businesses Busways works with and mitigating actions in place
- The number of suppliers engaged through modern slavery questionnaires
- The number of questionnaire responses returned by suppliers
- The number of key senior managers/people leaders trained in modern slavery prevention
- The number of employees trained in modern slavery prevention
- The number of policies and procedures related to modern slavery prevention that are successfully established and incorporated into the operations of Busways Group.

1.6 Process of consultation within Busways Group

All the entities in Busways Group are family owned. For consultation purposes, Busways Group reporting entities have common directorships. One entity of the Busways Group, Galbrock Pty Ltd, is a sole directorship.

This Statement has been reviewed and approved by the directors of Busways Group entities. The development of this Statement was done and reviewed by an executive/senior management group comprising representatives of Busways Group.

1.7 Future commitments

Busways Group is committed to continue working on its systems and controls to assess and manage modern slavery risks in our operations and supply chain. Action plans formulated in FY22 are:

1.7.1 Policies and procedures

To ensure our expectations in relation to mitigating the risks of modern slavery are incorporated across Busways Group's operations and supply chain, we will continue reviewing, developing, and refining modern slavery related policies and procedures. Specifically, in FY23, our goal is to finalise our modern slavery policy and updated supplier questionnaire which will provide important data for enhancing our risk assessment and partnering with suppliers to mitigate these perceived risks.

1.7.2 Training and awareness

Busways Group recognises the importance of modern slavery awareness and education. We commit to taking a continuous improvement approach to addressing the risks and the impacts to internal employees and external suppliers. Following the plan agreed by the Modern Slavery Committee, we will refine our current modern slavery prevention training materials and then roll out across all departments of Busways Group during the following reporting period.

1.7.3 Collaboration and engagement

Busways Group is committed to building strong and collaborative relationships with all suppliers. The next stage in our plan is to send out more comprehensive modern slavery questionnaires to our high-risk suppliers and seek to understand their willingness to adopt further measures that will meet our requirements.

To support our suppliers to value and be educated in human rights, our Modern Slavery Committee is formulating an education plan for external suppliers, through which we hope to raise awareness and create more collaboration across our supply chain.

This Statement was approved by the boards of each of the three reporting entities covered by this Statement.

The Board of:

- Bhaajayu Pty Ltd
- Busways Australia Pty Ltd
- Busways Blacktown Pty Ltd
- Busways Camden Pty Ltd
- Busways Campbelltown Pty Ltd
- Busways Gosford Pty Ltd
- Busways North West Pty Ltd
- Busways Pacific Pty Ltd
- Busways South Australia Pty Ltd
- Busways Wyong Pty Ltd

Approved this statement on: 29 November 2022

A handwritten signature in black ink, appearing to read 'Byron Rowe'.

Byron Rowe, Director

Date: 29/11/2022

A handwritten signature in black ink, appearing to read 'Richard Rowe'.

Richard Rowe, Director

Date: 29/11/2022

The board of Galbrock Pty Ltd approved this statement on: 29 November 2022

A handwritten signature in black ink, appearing to read 'Byron Rowe'.

Byron Rowe, Director

Date: 29/11/2022