



# TRANSDEV AUSTRALASIA

## MODERN SLAVERY STATEMENT

### 2022

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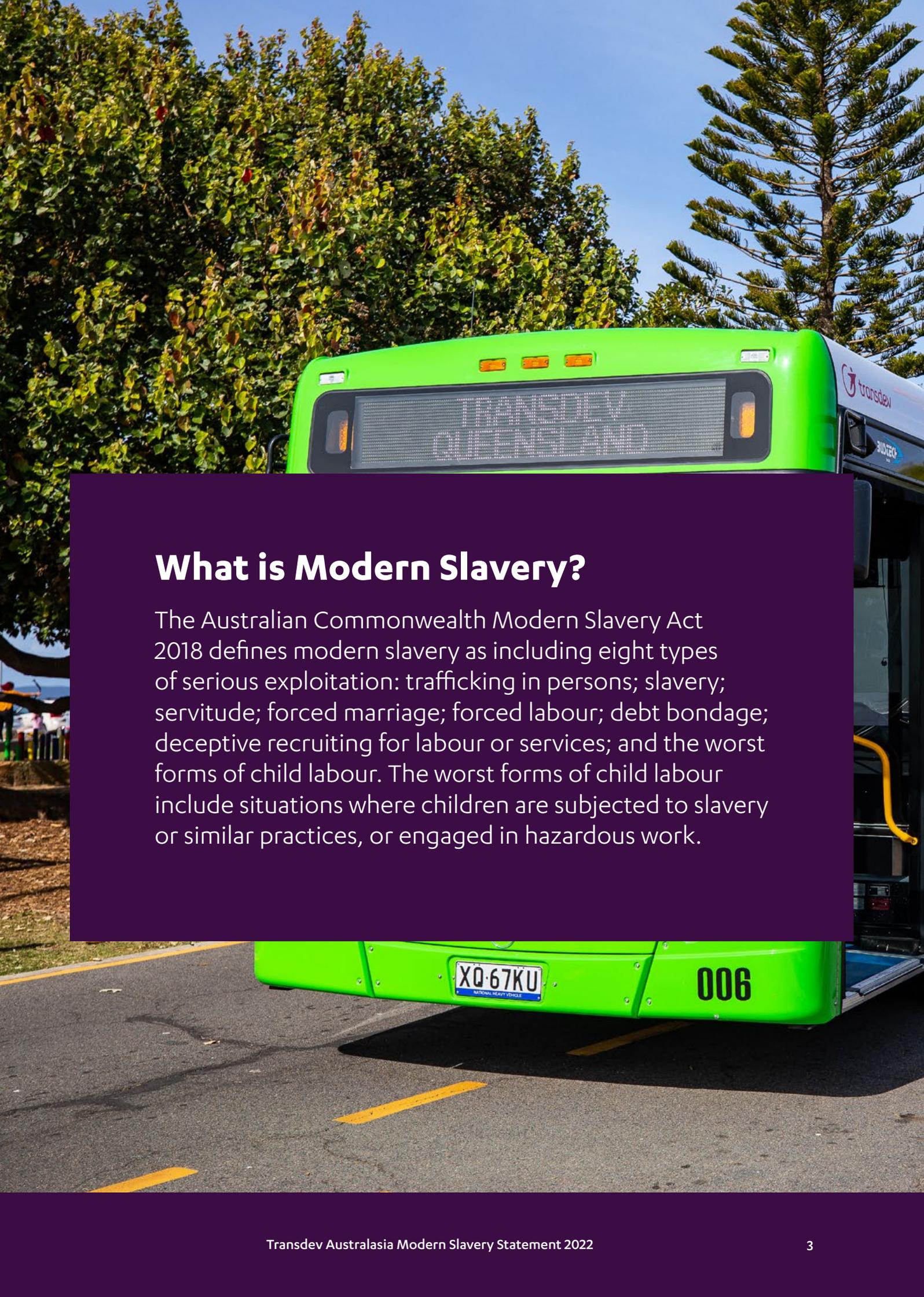


## Acknowledgment of Country

Transdev Australasia acknowledges the Traditional Custodians of the land and pays respect to Elders past and present.

With operations across many locations in Australia, we recognise and respect the cultural heritage, beliefs, and relationship with the land, which continue to be important to the Traditional Custodians living today.

With regards to our New Zealand operations, we recognise the Maori people as the Tangata Whenua Aotearoa (people of the land NZ), and the Tiriti o Waitangi (Treaty of Waitangi).



## What is Modern Slavery?

The Australian Commonwealth Modern Slavery Act 2018 defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour include situations where children are subjected to slavery or similar practices, or engaged in hazardous work.



# CEO introduction and purpose of this statement

Transdev Australasia recognises the importance of combating modern slavery, a crime that affects individuals and communities across the globe. As a company committed to sound environmental, social and governance practices, we promote ethical behavior throughout our businesses, and ensure that our robust standards of business conduct are understood and valued by all employees. We are determined that no person's freedom is denied anywhere in the operations of our businesses or our supply chains.

This is a statement pursuant to section 14 of the Act made by reporting entity Transdev Australasia Pty Ltd (Transdev Australasia), a proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth). Transdev Australasia is the parent

company and principal governing body of Transdev Australasia's group of entities and has prepared this Statement on behalf of those entities constituting reporting entities as defined under the Act. A description of entities covered by this Statement, their structure and operations is included in Section 2 and are together referred to as "us", "our", "we" or "Transdev".

This Statement describes the steps taken by Transdev to assess and address modern slavery risks in accordance with the mandatory reporting criteria under the Act. The mandatory reporting criteria and how we are addressing them in this Statement are set out below:

<b>Mandatory criteria for modern slavery statements</b>	<b>Page</b>
Identify the reporting entity (About Transdev Australasia)	6-7
Describe the reporting entity's structure, operations and supply chains	8-10
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	11-13
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	14-19
Describe how the reporting entity assesses the effectiveness of these actions	20-21
Any other relevant information (Future outlook)	22
Describe the process of consultation with any entities the reporting entity owns or controls	23

We recognise the potential existence of modern slavery in our operations and supply chains. Our approach is to manage modern slavery risks as a subset of broader sustainability related concerns important to our business and stakeholders. We are committed to the objectives and principles underpinning the Act and to working with our stakeholders, contractors and suppliers in preventing and mitigating any modern slavery impacts associated with our day to day work.

This is our third Modern Slavery Statement and we continue to make strong progress. In 2022 Transdev Australasia's due diligence processes continued to evolve through the implementation of our Procurement Framework and Know Your Counterpart Procedure, both requiring enhanced screening for high-risk suppliers. During the reporting period, Transdev Australasia also delivered tailored training programs on our Procurement Framework, Corporate Governance Principles, Anti-Corruption Policies, Ethics and Compliance Management System and risks associated with Modern Slavery.

We continued to implement our Sustainable Procurement Action Plan (SPAP) launched in 2020. The three year SPAP was developed with

the support of external experts and informed by completing a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable procurement and mapping risks and opportunities inherent in our supply chains.

The SPAP complements Transdev Australasia's existing governance and risk management practices, in Australia and New Zealand and globally as part of the European headquartered Transdev Group. Our approach shows our commitment to meeting our communities' expectations, to improve trust and respect among all employees and with our stakeholders.

While this statement directly references our Australian businesses, initiatives described in this Statement also apply to New Zealand operations.

Sincerely,



**Brian Brennan, CEO Transdev Australasia**

**Our purpose at Transdev is to give people the freedom to move every day, thanks to safe, reliable and innovative solutions that serve the common good. We connect people and communities – where they live, work and play – operating public transport services on buses, ferries, light rail, trains and new mobility solutions across five cities in Australia and New Zealand. Showing genuine care for our employees, stakeholders, communities and our customers is at the very heart of our purpose, and therefore so too is the fight to combat modern slavery.**

# Section 1 | About us

Transdev Australasia is one of the region's leading multi-modal mobility operators employing over 5,650 people at the end of 2022 in Melbourne, Sydney, Brisbane, Perth, Wellington and Auckland.

In 2022 we delivered more than 83 million passenger journeys connecting people and communities.

Transdev Australasia specialises in the operation and maintenance of several public transport modes including buses, ferries, light rail and trains.

We are part of Transdev Group S.A. – an international group of over 84,000 people who deliver 8.8 million passenger trips every day across 19 countries, thanks to efficient, easy to use and environmentally friendly mobility services.

## Our purpose and approach

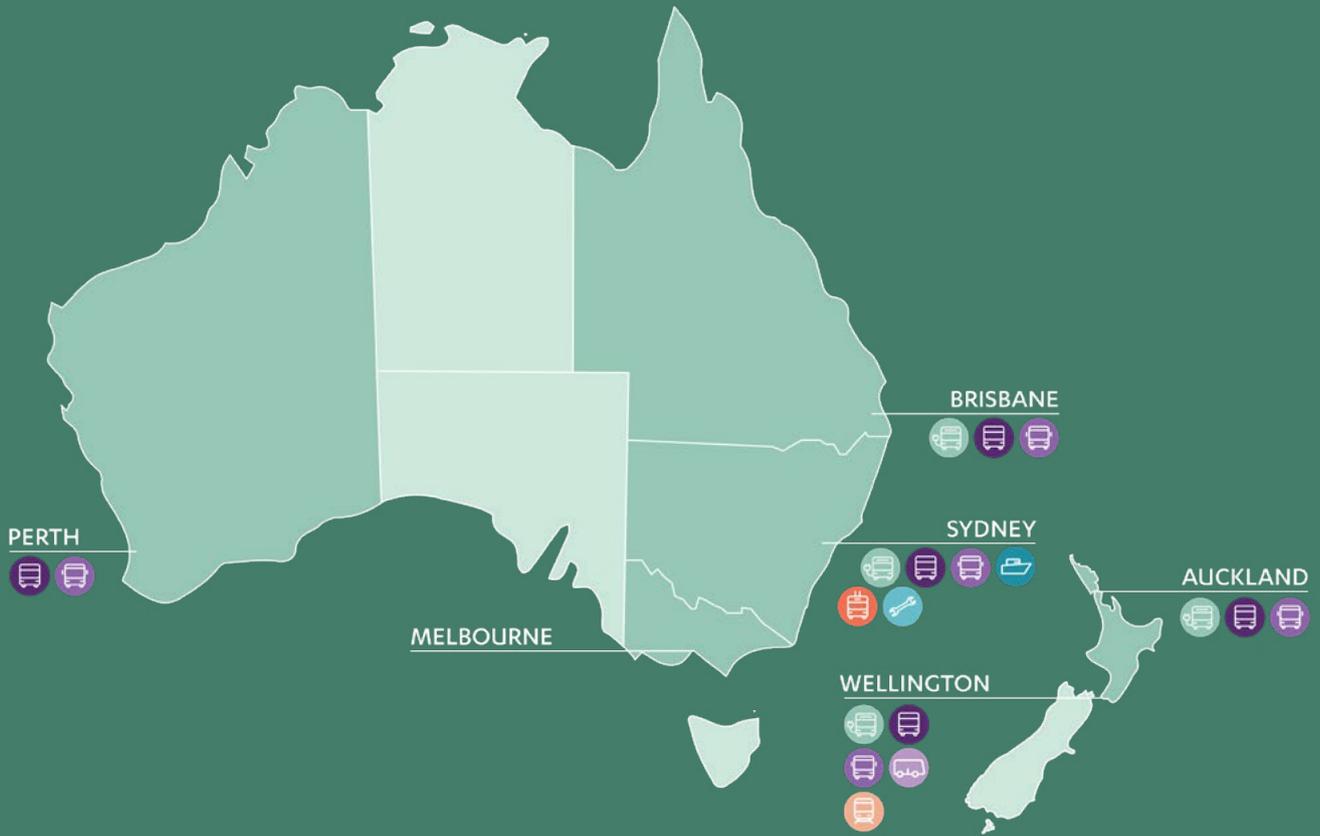
Our approach is rooted in long-term partnerships with communities, businesses and public transport authorities, and in the relentless pursuit of the safest and most innovative mobility solutions.

We strive to be at the forefront of providing safe, reliable, and innovative transport solutions to meet the needs of today and tomorrow, empowering communities and contributing to more liveable cities.

Transdev Australasia is committed to providing services, and acting in a way, that consistently meets and exceeds community, customer and client expectations.



We empower freedom to move every day thanks to safe, reliable, and innovative solutions that serve the common good.



**83M+**

Customer Journeys  
per year

**6**

Locations

**5650+**

Employees



# Section 2 | Structure, operations and supply chain of Transdev Australasia

Transdev Australasia is the parent company of several entities operating public transport and related services in Australia and New Zealand, and the controlling joint venture partner in Great River City Light Rail Pty Ltd and Transdev John Holland Buses (NSW) Pty Ltd. The table on page 9 sets out these entity's structure and operations with further detail on operations provided overpage.

## **Our operating model**

Transdev Australasia's public transport operations are split up into four teams. Our Operational team focuses on delivering an ever-improving service to all of our customers and consists of drivers, operational managers and other vital frontline employees. Our Fleet/Assets team maintains our assets, including the condition of our vehicles/vessels to support a safe and secure experience for our customers. Our Facilities team focuses on maintaining our building assets. Our Corporate team – including IT, Legal, People & Culture, Communications, Finance, Network Planning and Safety & Assurance among other functions – provides support to all primary teams.

We have identified 26 supplier categories specific to our operating model, outlined on page 10.

## **Our supply chain structure**

Transdev Australasia actively coordinates with over 1,800 suppliers, ranging from fleet procurement, spares and maintenance to cleaning and security. Our emphasis on long-term strategic partnerships enables us to foster close relationships with our suppliers, and results in the ability to implement a joint approach to tackle sustainability related issues.

Around 217 of our supplier relationships exceed a spend of 100,000 AUD per year. The strength and magnitude of these supplier relationships create increased need and opportunity to collaborate and mitigate risks in the supply chain and strive for continuous improvement and improving sustainability outcomes.

We communicate our supplier charter as a commitment to ethical, sustainable and socially responsible procurement (Supplier Charter). This Supplier Charter applies to all suppliers engaged by Transdev and sets out the minimum requirements for suppliers and their supply chain in the areas of integrity, ethical business conduct, conflict of interest, gifts, benefits and hospitality, corporate governance, labour and human rights, health and safety and environmental management.

Suppliers to Transdev are required to comply with this Supplier Charter in accordance with Transdev's purchase order terms and conditions or the relevant contract for the supply of goods and services; including committing themselves to eliminating human rights related risks and complying with possible audits.

Parent company	Controlled Entities	Operating model	Legal Structure
Transdev Australasia 100%	Transdev NSW South Pty Ltd	Bus public transport and charter services in Sydney, Perth, Brisbane and Melbourne	Proprietary companies limited by shares incorporated under the Corporations Act 2001 (Cth)
	Transdev NSW Pty Ltd		
	Transdev WA Pty Ltd		
	Transdev Queensland Pty Ltd		
	Transdev Sydney Pty Ltd	Light rail public public transport services in Sydney	Companies limited by shares registered under the Companies Act 1993 (NZ)
	Transdev Sydney Ferries Pty Ltd	Ferry public public transport services in Sydney	
	Transdev Maintenance Services Pty Ltd	Professional asset maintenance and project management services	
	Transdev Australasia 70%, CAF Australia 30%	Howick & Eastern Buses Ltd	Bus public transport and charter services in Auckland and Wellington
Mana Coach Services Ltd			
Transdev Wellington Ltd		Rail public transport services in Auckland and Wellington	
Transdev 75%, John Holland 25%	Great River City Light Rail Pty Ltd	Supply, operate and maintain Paramatta light rail network in Sydney	A proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth)
	Transdev John Holland Buses (NSW) Pty Ltd	Public transport and charter services in Sydney	

*Transdev Australasia's controlled entities, covered by this Statement*

**217**

Suppliers with spend over 100,000 per year

**26**

Key categories

**136**

Suppliers with spend over 200,000 per year

Team/operational area	Procurement Categories	
Corporate	IT & telecommunications services	Marketing, communication & publishing
	IT equipment & software	Insurance, legal & financial services
	Collective living and catering area	Labour hire & recruitment
	Office supplies & furniture	Travel & company cars
	Consultancy	
Facilities	Infrastructure subcontracting or facility management	Waste management
	Utilities (including Electricity Supply)	Construction
	Security & CCTV	
Fleet/Assets	Spare parts	Batteries
	Repairs & maintenance subcontracting	Tyres
	Tools, hand tools, small equipment supplies	Diesel fuel & additives
	Bus, coach & vessel – purchases	Lubricants
Operations	Cleaning	Uniforms
	Cash transportation subcontracting	Safety equipment

*Key supplier categories relevant to our teams and operating model*



# Section 3 | Modern Slavery Risks

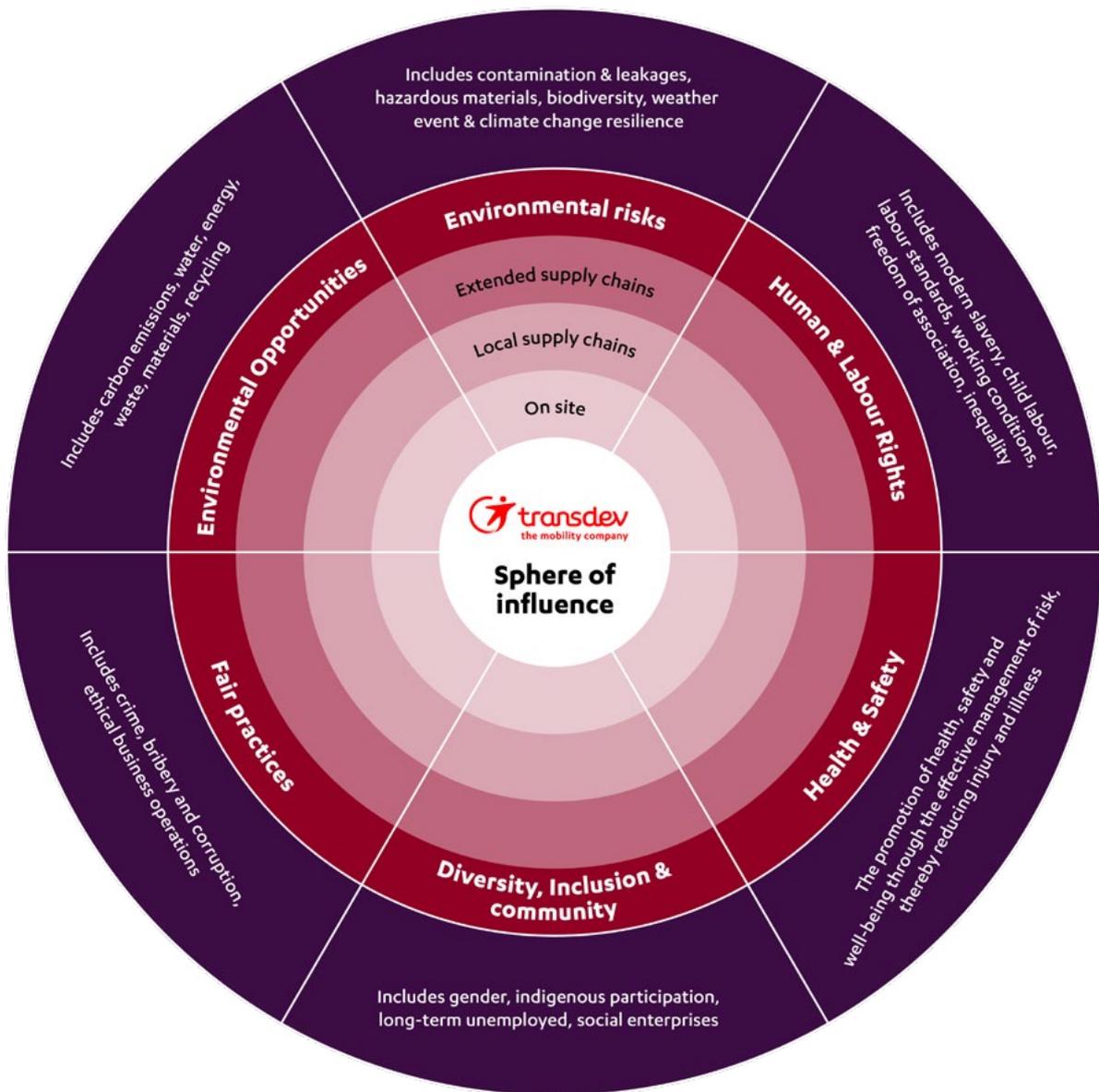
## Risks associated with our operational structure

Transdev Australasia's operational structure is characterised by a high degree of unionisation and a largely local supply chain. Frontline employees working within or for Transdev are subject to enterprise agreements under which they are remunerated accordingly. All of our other employees, including the majority in corporate teams, are subject to employment contracts. Due to the nature of these employment arrangements, the risk of modern slavery directly within Transdev Australasia's workforce is low.

## Risk assessment

In 2020 we established a Sustainable Procurement Project Team, including members of our Procurement, CSR, People and Culture and Safety and Assurance functions. This collaborative team worked with reputable external experts to complete a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable Procurement, and a risk and opportunity analysis of our supply chain. Through a series of internal stakeholder interviews and risk workshops we reviewed our 26 supplier categories (outlined in Section 2) and mapped risks and opportunities covering our six key focus areas of sustainable procurement highlighted below.





*The six key focus areas of Transdev Australasia's approach to sustainable procurement*

## Risk assessment results

Transdev Australasia has not yet identified any specific instances of modern slavery and so far, has found with high confidence, that we do not actively cause or contribute to modern slavery. However, we recognise the risk of modern slavery in our operations and supply chains remains. As a result, we have committed ourselves to facilitating additional transparency throughout our extended supply chain.

Through our comprehensive program of risk and opportunity assessments, we identified four potential areas which are known to be prone to an increased risk of human rights and modern slavery related issues. These areas include cleaning, security, uniforms and bus manufacturing.



**Cleaning:** Our organisation has implemented strict hygiene and cleaning protocols to contribute to safe and secure transport solutions.



**Security:** Transdev Australasia subcontracts most of its security needs. Modern slavery risks exist similar to those in the cleaning industry, associated with labour hire. Furthermore, modern slavery risks also exist in the manufacturing of CCTV and security equipment due to complex overseas supply chains.



**Uniforms:** Transdev Australasia procures uniforms through suppliers who have complex overseas supply chains. We therefore acknowledge a risk associated with the nature of the product and have developed a strategy with our uniform supplier to indicate the sourcing country and the region for each and every garment we purchase. Suppliers will also provide certificates of ethical practices from the factories where the uniforms are manufactured.



**Bus Manufacturing:** In the reporting year, Transdev Australasia procured buses with overseas supply chains. We acknowledge a risk associated with the nature of these products and in particular risks in countries where raw materials are sourced for electric batteries.



# Section 4 | Our relevant policies, procedures and practices

We have a zero tolerance approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or that of those who supply us; this stance is made clear in all our policies and behaviours.

Our key policies and procedures, outlining the steps that we have taken to mitigate against the risks of modern slavery, are set out below. These are reviewed on a regular basis.

- Our Code of Conduct which sets out the conduct that we expect of our partners, employees, contractors and suppliers.
- Our Group Code of Ethics which covers key topics as: Integrity, Opposition to Fraud and Corruption and Knowledge of Third Parties.
- Our Business Ethical Guidelines Policy which communicates how we should interact with our business partners and environment, with particular focus on Conflict of Interest and Confidentiality
- Our Group Human Rights policy expands on what we mean by protecting Human Rights and how this should be done in a daily business context. This policy requires all TDA employees to respect and adhere to the policy principles and report any misconduct. The policy protects rights to:
  - Acceptable working conditions
  - Acceptable hours, wages and leaves
  - Fair treatment
  - Freedom of association
  - Free and adult labour
- The Anti-Corruption, Money Laundering and Financing Terrorism (ACMF) Code provides guidelines, rules and principles associated with:
  - Gifts and invitations
  - Sponsorship, Corporate Philanthropic, Non-profit Organisations and Charities
  - Intermediaries
  - Political Contributions
  - Facilitating Payments
  - Influence Peddling
  - Collusion
  - Recruitment and other HR Advantages
  - Business relationships

- The Transdev Australasia Whistleblowing Protection Policy allows staff and external stakeholders to raise any concerns that they may have about any individuals or organisations that Transdev Australasia interacts with, whether they be clients, suppliers or others.

## Established governance and risk management practices

The established elements below also contribute to how we manage our response to human rights and modern slavery risks:



**Supplier Charter:** Our Supplier Charter sets out the responsibilities and reporting standards we expect of our suppliers and ensures suppliers comply with local and wider regulation. We expect all existing and new suppliers to commit to the charter including all clauses within it. Our dedication to eliminate modern slavery is communicated through our human rights section which includes (but is not limited to) provisions on coercion-free as well as the absence of forced, bonded or indentured labour.



**Model Contract Clauses:** Transdev has developed Model Clauses for agreements with counterparties, prepared in line with generally accepted market standards and main regulatory contracts relating to ethics and compliance matters (e.g. UKBA, FCPA, Sapin II). They are designed to remind our counterparty of the values and principles to which we adhere, obtain various representations including that the counterparty has not and will not commit a violation of the ethics & compliance rules in connection with the purpose at stake, ensure Transdev has audit rights, and that we may suspend or even terminate the underlying contract in the event of a reasonable suspicion of breach.



**Ethics and Compliance Management System:** Transdev Australasia complies with Transdev Group's global Ethics and Compliance Management System (ECMS). The ECMS sets out stringent requirements in respect to the protection of human rights, transparency, action against corruption, and the application of local laws and regulations. Its requirements are embedded into our teams' management systems and plans, and form part of our internal performance monitoring.

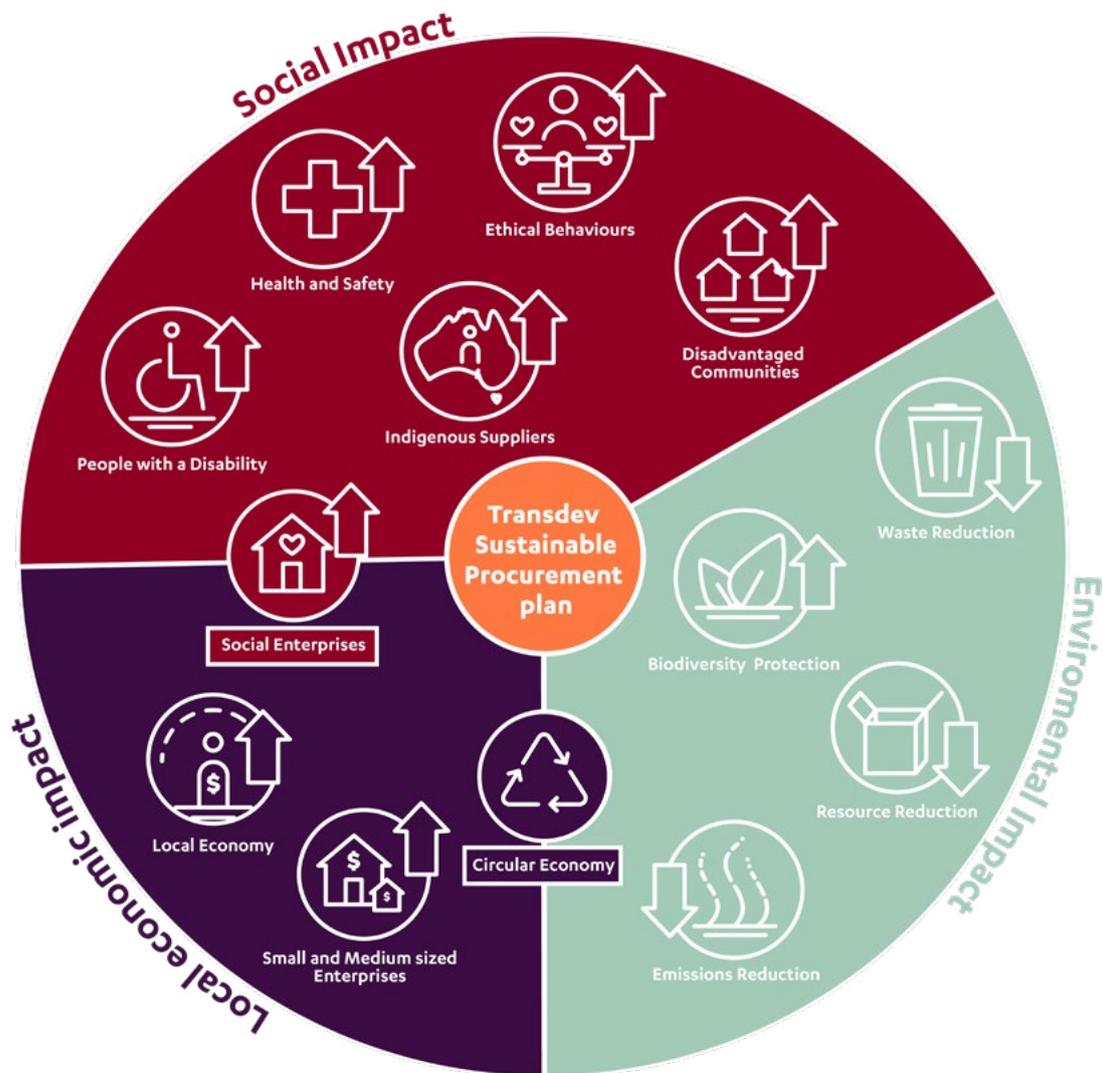


# Section 5 | Actions in 2022

In 2022 we continued the progressive implementation of our Sustainable Procurement Action Plan (SPAP).

The three year SPAP was developed by our Sustainable Procurement team with the support of external experts in 2020. It was informed by completing a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable procurement and mapping risks and opportunities inherent in our supply chains.

The core focus of the SPAP is the protection of human rights and combating modern slavery. Specific actions delivered under the SPAP are detailed in this Section.



Key objectives of Transdev Australasia's Sustainable Procurement Action Plan

## **Finalisation and Implementation of the Transdev Australasia Procurement Framework**

Within the reporting period Transdev Australasia introduced a new Procurement Framework in accordance with our SPAP. The new Framework specifically addresses modern slavery risks and broader sustainable procurement objectives. The 'Framework' sets out in detail the application of the TDA Procurement Policy (approved in 2021) aimed at delivering process standardisation, risk reduction, a strong supply chain and delivering key sustainability objectives around Indigenous Engagement, environment and social sustainability. The Framework seeks to:

- Manage Risk: protecting against reputation and compliance risks
- Create Opportunity: maximise the benefit to society and meet community expectations.

Under the Framework the following steps need to be completed for high-risk/opportunity suppliers:

- Evaluation against non-financial evaluation criteria (which includes environment, social sustainability and ethics assessment)
- Subject matter experts to review and evaluate responses to criteria

In order to promote sustainable procurement outcomes the new Procurement Framework has also introduced a tailored procurement method for Procurement Activities depending on whether the supplier is a commercial supplier or an Indigenous business or a Social Enterprise. The Procurement activities that involve Indigenous businesses and social enterprises have higher spend thresholds leading to a more streamlined engagement process. Training on the Framework took place with 40 employees from Transdev Australasia.

## **Finalisation and Implementation Transdev Australasia Know Your Counterparty Procedure**

In 2022 Transdev Australasia introduced a Know Your Counterparty (KYC) procedure outlining a screening process as part of the onboarding process for high risk business engagements. The KYC process requires screening of high-risk counterparties to determine if they are compliant with law and regulations, financially viable and ethically aligned with Transdev Australasia prior to entering a contractual agreement. Training on the procedure was completed with key representatives from the Transdev Australasia Business Development and Procurement teams.

## **Prohibited Countries List**

The Transdev Australasia Prohibited Countries List for procurement activities was updated in 2022 to include High Risk Third Countries identified by the European Commission and the Financial Action Task Force. Engagement with a prohibited Country requires prior approval from the Transdev Australasia Chief Legal and Commercial Officer.

## **Need to Know November**

There is a potential risk of apathy towards modern slavery and other ethics and compliance related risks in Australia and New Zealand, and many business decisions are decentralised. Transdev Australasia completed an awareness campaign in November 2022, called Need 2 Know November, recognising these two challenges. The campaign engaged a broad cohort of business leaders on issues such as corruption and modern slavery through a series of webinars held throughout the month and fact sheets. Over 300 combined participants were registered, and the campaign successfully raised awareness

of risks and opportunities, laws and policies and the requirement to report real or perceived ethics breaches.

## **Whistleblower Awareness Campaign**

The availability of the Transdev Australasia Whistleblower platform was communicated via a poster campaign launched in Depot and office spaces.

A high level Bulletin on Whistleblowing and Reporting Misconduct was also sent to approximately 300 employees during the reporting period and complementary training was delivered to 40 Transdev Australasia employees.



# Case Study

## Transdev Australasia Fuel Tender

In 2022 Transdev Australasia completed a national fuel tender. Fuel is the highest spend category for our business and, accordingly, assessment of supplier systems to prevent modern slavery occurrences formed substantial component of the evaluation process.

The successful supplier:

- Confirmed that they had a workplace compliance program to help ensure fair and legal treatment of workers employed throughout its associated retail sites.
- Demonstrated a Human Rights Policy and Code of Conduct which set out their stance on modern slavery and treatment of workers.
- Outlined process to assess the risk of worker exploitation and modern slavery in its operations and supply chains and due diligence on high-risk suppliers to ensure compliance with modern slavery prohibitions.
- Advised of an internal training plan to ensure people dealing with higher risk areas in the organisation and supply chain are able to identify arrangements that are in breach of the law or pose a heightened modern slavery risk and a grievance mechanism for people to safely report exploitation.

Transdev Australasia's commitment to eliminating the risks of Modern Slavery practices was an essential feature of the tendering process for this known high-risk and high-impact area of supply.



# Section 6 | Measuring performance and effectiveness

## ECMS Working Group

Transdev Australasia's ECMS (Ethics and Compliance Management System) Working Group is comprised of members of the finance, legal, safety and assurance, people and culture and IT departments. This Group meets quarterly to discuss the effectiveness of our ethics and compliance framework. It has oversight to:

- Provide for regular engagement and feedback between key functions on all ethics and compliance topics, including Modern Slavery;
- Tracking the impact of actions taken to improve ethical purchasing;
- Discuss ethics training development and deployment;
- Consider improvements requirements to our ECMS

## Remediation

At Transdev Australasia, we value input and feedback on issues such as modern slavery from all stakeholders. Our culture of minimising risks and taking responsibility allows us to take a proactive stance on remediation.

The Transdev Australasia Whistleblower Policy applies to all employees and to external stakeholders. Through the policy Transdev Australasia aims to enable team members and others to confidentially voice concerns, without fear of retribution. In 2022 no feedback was received through the Whistleblower platform with allegations of modern slavery.

## Monitoring Performance

Action	Performance Indicator
Ethics and Compliance Working Group	Meeting Frequency
	Meetings Held
Training	Percentage (%) of TDA's key categories employees (contract management, procurement) trained to recognise and safeguard against modern slavery risk
	Percentage of Transdev Managers who have completed Anti-Corruption Training

**Action** **Performance Indicator**

Modern Slavery Instances **Instances detected**

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**Instances remedied (and how)**

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# Section 7 | Future Outlook

In 2023 and beyond, we expect to increase our diligence regarding modern slavery reporting and risk management. We will continue to progressively implement our SPAP over the next two years. In 2023 we will aim to complete Year 3

of the plan. A high level summary of our planned activities to realise our SPAP objectives are highlighted below:

## 2023 objectives

Focus Areas	Objectives
Supplier Management	Development of a Supplier Induction Process, which will require new suppliers to read and acknowledge key Transdev Australasia ethics and sustainability policies as part of their engagement.
	Development of a high-risk supplier audit program. Audits will address ethics and compliance topics.
Training and Awareness	Training of Operational Staff on the Transdev Australasia Ethics and Compliance Management System.
	Enhanced e learning training for Modern Slavery Risks delivered to at risk employees.
Remediation	Increase operational engagement with the Transdev Australasia Whistleblower Platform by providing information and access links on the employee App.



# Section 8 | Stakeholders coordination and engagement

All of Transdev Australasia's controlled entities, as outlined in Section 2, were consulted and involved in the preparation of this Statement.

This Statement was prepared by the Transdev Ethics team, in consultation with senior management including the reporting entity's Executive Leadership team and operational teams involved in the ongoing implementation of the Sustainable Procurement Action Plan.

This Statement has been approved by the Board of Directors of Transdev Australasia.



**A**s an operator and global  
integrator of mobility,  
Transdev **gives people**  
**the freedom to move**  
whenever and however they  
choose.

**Transdev Australasia**

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