

# 2021

## MODERN SLAVERY STATEMENT





# CEO message

***It is a deeply uncomfortable fact that the risk of human rights abuses—including slavery—can exist in some of the most ordinary business activities; from the goods we buy, to the services and materials we use.***

Modern slavery involves the exploitation of human beings, and it is estimated 40 million people are trapped in modern slavery worldwide, with a significant proportion being children and women<sup>1</sup>.

Respecting human rights, including freedom from all forms of abuse that make up modern slavery, is a global responsibility.

However, it is important that businesses such as ours, with expansive supply chains, actively participate in initiatives aimed at eradicating modern slavery.

At Transurban, we are continuously improving our understanding and mitigation of the risks of modern slavery occurring within our operations and supply chain.

Our values underpin the way we go about our work and how we treat those we encounter. These values—integrity, collaboration, accountability, ingenuity and respect—are at the core of how we manage our operations and interact with our suppliers.

Last year, we published our first Modern Slavery Statement. This year's statement builds on this foundation and outlines the initiatives we have progressed to meet our objectives, including strengthened key policies, additional training for our people, and sharing knowledge with our partners and peers.

While we did not identify any instances of modern slavery in our operations or supply chain in FY21, we acknowledge that we must remain vigilant and we plan to continue to evolve our approach to monitoring for these risks in the future.

We look forward to continuing to expand the work we have done so far, while sharing knowledge among our industry partners to continue to protect human rights.

A handwritten signature in black ink, appearing to read 'Scott Charlton'. The signature is fluid and cursive.

**Scott Charlton**  
*Chief Executive Officer*

<sup>1</sup> International Labour Organisation, [ilo.org/global/topics/forced-labour/lang--en/index.htm](https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm)

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### Our broader sustainability efforts

Further information on our broader approach to our community and sustainability is available at [transurban.com](https://www.transurban.com)

**This includes the Transurban:**

**[FY21 Corporate Report](#)**

**[FY21 Corporate Governance Statement](#)**

**[FY21 Sustainability Supplement](#)**

**[Innovate Reconciliation Action Plan](#)**

**[Financial Inclusion Action Plan](#)**

### Transurban reporting entities under the Act

This statement is prepared for the purposes of the *Modern Slavery Act 2018* (Cth) (Act). This is a joint statement by each of the reporting entities under the Act within the Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group as defined in Appendix A. For the purposes of this statement, 'Transurban' collectively refers to Transurban Parent Group, Transurban Queensland Group and the Airport Motorway Group, as defined in Appendix A.

The WestConnex Group and NorthWestern Roads Group (both of which Transurban holds an interest in) will each be lodging their own separate modern slavery statements under the Act. In FY20, the Transurban Sustainable Procurement Program (the Program) was deployed across the WestConnex Group, 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. Statistics and data presented in this statement include those businesses, unless otherwise stated.



# FY21 in review

- In FY21, Transurban did not identify any instances of modern slavery in our operations or supply chain. We acknowledge that this does not mean modern slavery was not present, and that we are still evolving our ability to identify modern slavery instances in our operations and supply chain
- More than 99% of our direct spend with Tier 1 suppliers is located in the countries where our operations are based—Australia, Canada and the United States
- The majority of our direct Tier 1 procurement spend is on services rather than goods
- We are increasingly integrating sustainability into all aspects of our business strategy, planning, operations and supply chain management activities and aim to make meaningful contributions to the UN Sustainable Development Goals (SDGs). Assessing and addressing our human rights impact and modern slavery risks is an important part of this work

*Modern slavery involves the exploitation of human beings, and Transurban recognises that we have a responsibility to respect human rights including freedom from all forms of abuse that make up modern slavery. As part of this responsibility, we are continuously improving our understanding and mitigation of the risks of modern slavery occurring within our operations and supply chain, and during FY21, Transurban progressed a number of initiatives to meet these objectives.*

These initiatives support our broader approach to managing sustainability, which is aligned to the SDGs. This is our second Modern Slavery Statement published in accordance with the Act, and builds upon the foundation that was reported in our [FY20 Modern Slavery Statement](#).

Key activities for FY21 included:

## **Policies and procedures**

- Reviewed, refreshed and strengthened key policies and procedures including our Supply Chain Modern Slavery Remediation Guidelines, as well as establishing our Human Rights Policy (see page 16)
- Implemented additional controls to guide how low value purchases are managed for categories of goods and services that are potentially high-risk for modern slavery

## **Contractual terms**

- Continued to refine and update our supplier requirements and contractual provisions relating to modern slavery for a new generation of standard clauses in supply contracts for goods and services, which are classified as potentially higher risk for modern slavery (see page 15)

## **Risk identification**

- Continued to evolve the way we identify and assess risks. For example, by looking at the latest information available on key commodities, sectors, industries, geographical areas and specific organisations, and expanding our analysis to incorporate the M5 West in Sydney (see page 14)

## **Reporting**

- Published our inaugural Modern Slavery Statement for FY20 and sought feedback on this statement from relevant stakeholders

## **Training and awareness raising**

- Expanded training on modern slavery to employees in all functions within the Transurban Group to improve their ability to identify and respond to modern slavery risks
- Held detailed workshops with all Procurement sourcing employees, contract managers and a number of key suppliers, including a pilot project with our operations and incident response team on the Cross City Tunnel in Sydney (see page 11)

## **Industry collaboration**

- Continued to actively participate in numerous multi-stakeholder forums with suppliers as well as industry leaders and peers to share learnings and knowledge
- Continued to expand our joint industry-based initiatives to avoid taking a fragmented approach to our Sustainable Procurement Program (see page 12)

**Program timeline**

- FY18** ● Transurban Sustainable Procurement Program established and aligned to ISO 20400:2017
- Commenced working with our suppliers in anticipation of the Modern Slavery Act being passed through Parliament
- FY19** ● Joined the UN Global Compact Network Australia's Modern Slavery Community of Practice
- Partnered with the Infrastructure Sustainability Council of Australia (ISCA) to establish the Modern Slavery Road Construction Industry Coalition
- FY20** ● Established a leadership role dedicated to Sustainable Procurement
- Implemented new policies, procedures and contractual terms to better address our risks. Our people and supplier partners engaged in modern slavery awareness training and workshops
- FY21** ● Published our inaugural Modern Slavery Statement for FY20
- Commenced an operations pilot program to support our incident responders to better identify and respond to potential instances of modern slavery within Transurban road asset operations



# About Transurban— what we do

- 21**  
roads under operation<sup>2</sup>
- 07**  
projects in development or delivery
- 2M**  
trips daily across our roads
- 9M**  
customers and road users globally
- 8K+**  
total workforce<sup>3</sup>
- 1996**  
listed on the Australian Securities Exchange
- Leader**  
in global sustainability benchmarks<sup>4</sup>

*As one of the world's largest toll road developers and operators, our business is to get people where they want to go as quickly and safely as possible.*

Since opening CityLink in Melbourne in 1999, our company has grown to include 21 toll roads in Australia, the United States and Canada. We have 5.7 million customers in Australia, while in North America over 3.2 million drivers choose our roads for faster, safer and more reliable trips. Transurban Group is publicly listed on the ASX, with a market capitalisation of \$39 billion as at 30 June 2021.

Our purpose—to strengthen communities through transport—underpins all that we do. From our traffic control room operators who monitor our roads 24/7, to our traffic planners who interrogate travel data to forecast where congestion hot spots could be in a decade's time, our team is focused on making travel easier now and in the future.


We continually challenge ourselves in the way we respond to social and environmental issues, and invest in both to create social inclusion and manage our environmental impacts.

The way we go about our work, how we treat each other and all of the people we come into contact with, reflect our values of integrity, respect, accountability, collaboration and ingenuity.

We operate under a stapled structure and our triple-stapled securities trade on the ASX under the code "TCL". Each of our stapled securities comprise a share in THL, a unit in THT and a share in TIL. Each of THL's and TIL's shares and the unit in THT are quoted and trade as a single security on the ASX and cannot be traded separately. THL, THT and TIL are governed by boards that have common membership and are managed by the same senior management team.

Controlled entities within Transurban include a number of corporate entities

domiciled and incorporated in Australia, the United States of America and Canada.

 Further details about Transurban, including details about its executive team and assets can be found in the FY21 Corporate Report at [transurban.com](https://www.transurban.com)

This statement covers the following groups:

## Transurban Parent Group

For the purposes of this FY21 Modern Slavery Statement, 'Transurban Parent Group', refers to the parent entity, THL, and the stapled entities TIL and TIML as the responsible entity of THT, as well as the following subsidiaries: CityLink Melbourne Limited; The Hills Motorway Limited; and Interlink Roads Pty Limited.

See Appendix A for further details regarding the reporting entities held by the Transurban Parent Group and reported against in this statement.

## 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 per cent), AustralianSuper (25 per cent) and Tawreed Investments, a wholly owned subsidiary of the Abu Dhabi Investment Authority (12.5 per cent).

See Appendix A for further details regarding the reporting entities held by Transurban Queensland Group and reported against in this statement.

## Airport Motorway Group

Airport Motorway Group includes Airport Motorway Limited, the owner and operator of the Eastern Distributor Motorway in Sydney. Airport Motorway Group is a joint venture between Transurban (75.1 per cent), IFM Investors (14.37 per cent) and UniSuper (10.53 per cent).

See Appendix A for further details regarding the reporting entities held by Airport Motorway Group and reported against in this statement.

<sup>2</sup> Additional assets not included in this figure are Toowoomba Bypass and Inner City Bypass, Queensland, Australia.

<sup>3</sup> Total workforce includes direct employees, contract workers directly engaged by Transurban, and contract workers engaged through partner organisations.

<sup>4</sup> Global Real Estate Sustainability Benchmark—Infrastructure (2020) highest rated listed Infrastructure company globally. Dow Jones Sustainability Index (2020)—4<sup>th</sup> highest rated transport company globally. Carbon Disclosure Project (2020)—Climate Change "Leadership" benchmark and A-rating.

## Our values

Our values set the agenda for the way we work and how we interact with all of our stakeholders. Together these values set the foundation for our work on modern slavery risk management, and broader respect for human rights. These values are:



Integrity



Collaboration



Accountability



Ingenuity



Respect




# Our structure and operations

 Project

 Click the location names for detailed maps and information

## Greater Washington Area, USA<sup>5</sup>

● 495 Express Lanes <sup>6</sup>	50% Transurban 25% AustralianSuper 15% CPP Investments 10% UniSuper
● 95 Express Lanes <sup>6</sup>	50% Transurban 25% AustralianSuper 15% CPP Investments 10% UniSuper
● 395 Express Lanes <sup>6</sup>	50% Transurban 25% AustralianSuper 15% CPP Investments 10% UniSuper
 Capital Beltway Accord	This project is in development







5 From 18 August 2021 Transurban holds a 60% interest in the Phase 1 Maryland Express Lanes Project in Maryland, USA

6 Transurban ownership reduced from 100% to 50% from 1 April 2021

7 Rozelle Interchange is being delivered and funded by Transport for NSW

# Our structure and operations

(Continued)

***Transurban's workforce is made up of more than 1,700 direct employees across Australia and North America.***

Our people are involved in a broad range of activities including toll road operations and maintenance, major road project delivery, customer service as well as head office functions including Technology, Finance, Corporate Affairs and People and Culture.



Further details, including our roads and projects are set out in our FY21 Corporate Report at [transurban.com](https://www.transurban.com)

The processes and practices that Transurban applies with respect to managing modern slavery risks in our workforce form part of our overarching risk management program (including our Enterprise Risk Management Framework) and are subject to the oversight of the Transurban Parent Group Board and its Committees. Transurban Queensland Group and Airport Motorway Group are additionally subject to the oversight of their relevant group boards.

a service. The Code and policies, such as Ethical Business Practices, set out clear expectations with respect to human rights. These policies are supported by documented processes for the management of complaints and grievances and we have an independent whistleblower service if employees wish to report policy breaches confidentially. These policies and procedures are reviewed regularly and material breaches of policy are reported to the relevant group board for the business<sup>8</sup>.

In Australia, employment conditions are covered by the National Employment Standards (NES) which set out the 10 minimum employment entitlements that must be provided to all employees.

In addition, 39% of our employees are covered by Modern Awards or internal Enterprise Agreements, which set minimum pay and conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the NES.

We undertake annual reviews of the Modern Awards and employment contracts, to confirm our workers' entitlements are

being met. We also undertake regular internal and external audits to review and test our payroll practices. Transurban does not engage in external lending activities. It does, however, have a minority investment

in a non-road asset, which was assessed as part of our overall risk assessment as set out in 'Risk assessment process' on page 14.

*Our Code of Conduct and values articulate the behaviour expected of Transurban's Directors, Senior Executives and employees. It also covers suppliers engaged to provide a service*

Our Code of Conduct and values articulate the behaviour expected of Transurban's Directors, Senior Executives and employees. It also covers suppliers engaged to provide

<sup>8</sup> Airport Motorway Group management are subject to the policies and procedures as approved by Transurban.

–Case study–

## Road operations

*In FY20, we formed a cross-regional operations working group, to identify risks including the potential for modern slavery to occur within our operations (for example, the risk that human traffickers may use our toll roads as part of their wider operations).*

This group decided that the best approach was to undertake and monitor a pilot program on one Transurban motorway, aimed at training and supporting our people on how to better respond if they suspected that such a situation was occurring and then take lessons from this exercise to our other operations as appropriate.

In FY21, the Cross City Tunnel (CCT) in Sydney was selected as the motorway to commence our pilot. Anti-Slavery

Australia, an Australian leader in the anti-slavery movement, was appointed as our delivery partner. In addition, Ventia who is our supplier for Incident Response and Maintenance services on the motorway, also joined this pilot to consider all aspects of our operations.

To date we have completed an initial management awareness and protocol workshop, and we will extend training to our traffic control room operators and Ventia's Incident Response team at the CCT in FY22. We will continue to monitor and learn from this pilot over the longer term.

*“It is pleasing to see that our shared commitment with Transurban to address modern slavery risks is materialising into meaningful actions, as demonstrated through this pilot program for our first responders. It is one of many ways Ventia and Transurban are working together through our joint Sustainability Governance Group to address critical issues and challenges facing our industry.”*

–Dean Banks, Ventia Group CEO

*“We are proud to partner with Transurban and Ventia to co-design a unique modern slavery training program, created through close consultation with the working group. The program is an Australian first, with the aim of identifying and responding to the risk of modern slavery on motorways through real world examples and case studies.”*

–Professor Jennifer Burn, Anti-Slavery Australia

*“This pilot will assist our Traffic Control Room Operator and Incident Response teams to better identify scenarios where the risk of modern slavery could occur on our motorway, and how to safely respond to protect both our teams and potential victims.”*

–Evan Smith, CCT Asset Operations Lead



# Our supply chain

**Over \$1.4 billion in annual managed spend and more than 1,500 direct suppliers<sup>9</sup>**

With 21 assets and 7 projects currently in development or delivery, Transurban is in a position to make long-term improvements to the way we design, construct, operate and maintain our roads. To do this, we rely on a diverse range of suppliers, from global multinational construction contractors to local businesses.

Major project construction, incident response and maintenance and facilities management for our offices are among services that are outsourced on long-term contracts with critical supply chain partners. Our Tier 1 supply chain profile is heavily weighted towards the purchase of services, rather than direct goods or materials, which then form part of our extended supply chain.

Approximately 99.6% of our annual spend sits with suppliers whose direct trading site or headquarters is located in either Australia, USA or Canada (see Figure 1).

Our top supplier categories for FY21, which constituted over 58% of our total spend were<sup>10</sup>:

- **major project construction services**—design and construction of new or enhanced roads to improve connections within cities and to help people get where they need to be. Typically, Transurban will select a lead Design & Construction (D&C) subcontractor (or consortium) for each project, who will then manage delivery, including appointing subcontractors as necessary.
- **general consulting services**—provision of a variety of corporate management consulting services, which are predominantly desktop based

- **operations and maintenance services**—provision of ongoing works on our road assets to manage safety and operating standards in line with regulations and our concession deed requirements. Typically, Transurban will select an Incident Response and Maintenance service provider for each motorway, who will then tailor the delivery of various services including items such as civil, mechanical, electrical works as well as incident response services. This service provision may include appointing subcontractors as necessary.

## Procurement team

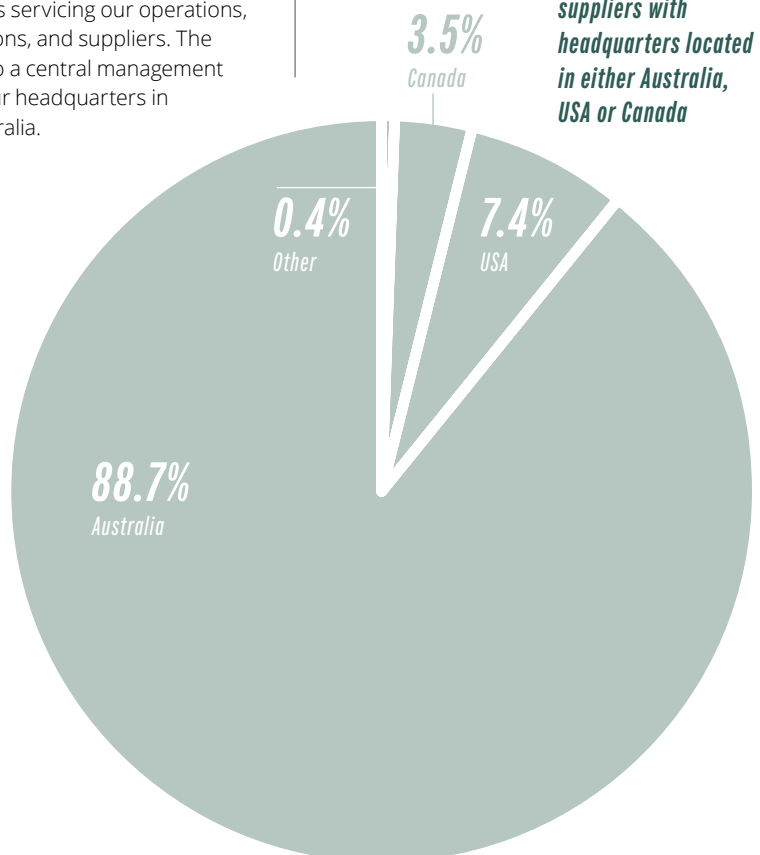
Our Procurement team is charged with wide-ranging responsibilities under Transurban's Procurement Policy including category management, strategic sourcing, procurement operations, our Sustainable Procurement Program and contract management framework, as well as supporting strategic corporate supplier relationships. This team is located across all operating regions servicing our operations, corporate functions, and suppliers. The team reports into a central management team based in our headquarters in Melbourne, Australia.

## Sustainable Procurement Program

The Sustainable Procurement Program was formally established in FY18 and focuses on the economic, social and environmental lifecycle impacts of our supply chain, including human rights issues.

The Program is aligned to the International Guidance Standard on Sustainable Procurement (ISO 20400:2017) and Transurban's sustainability approach, which aligns with the SDGs. This Program is managed by a dedicated Sustainable Procurement Manager. Further information on the governance of this program is contained in the 'Our approach' section on page 16.

**Figure 1:**  
**Annual spend at suppliers with headquarters located in either Australia, USA or Canada**



<sup>9, 10</sup> For purposes of clarity, this spend analysis excludes the WestConnex group.



–Case study–

## Promotional items

*Promotional items have been identified as a potential high-risk category through our risk assessment process.*

These items typically cover a range of low-cost branded goods that are given away to employees, customers or stakeholders to promote the organisation including items such as T-shirts and caps. The use of imported textiles in particular carries labour rights risks including issues such as unreasonable work expectations, unsafe working conditions and fears around visa status.

As outlined in our FY20 statement, the IVE Group was selected as our national preferred supplier in Australia

for promotional items due to the program they have instituted to manage labour rights risks. IVE is a member of Sedex (one of the world's leading ethical trade service providers), and is ISO 9001 (Quality Management Systems) and ISO 14001 (Environmental Management System) certified. IVE's suppliers comply with SA 8000 (Social Accountability) (or equivalent) certification and it conducts regular factory audits (both with internal and external resources).

In FY21, we implemented additional controls to guide how low value purchases are managed for categories of goods and services that are considered potentially higher risk categories for modern slavery. As part of this process, we analysed our spend on promotional items throughout the year (including corporate credit card purchases). We found a high adherence with the use of IVE Group as a preferred supplier, and alternative suppliers were only being used on rare occasions as a

secondary option. We held a dedicated workshop with our employees who would typically purchase these items to delve deeper into the risks surrounding modern slavery. Issues discussed included the reason why the IVE Group has been selected as our preferred supplier, the level of due diligence required for any alternate supply options, and what opportunities were available for further improving our practices to address risks in this category.

*“Modern slavery isn’t the first thing that springs to mind when you’re organising promotional t-shirts or showbags. But it’s extremely important to get right. The training was clear and concise, and helped our team understand how to minimize risks.”*

–Margie Dimech,  
Corporate Communications Manager



# Modern slavery risks

*We have a responsibility to take steps to identify the risks of modern slavery within our operations and supply chain. In FY21 we continue to refine the way we identify these risks and have expanded our set of due diligence processes across Transurban.*

## Risk assessment

Our risk assessment processes align with Transurban's Enterprise Risk Management Framework and the ISO 20400 guidelines. However, we also recognise the need for a broader view when assessing human rights, including modern slavery risks, and have considered the continuum of conduct approach outlined in the UN Guiding Principles on Business and Human Rights as suggested by the Guidance for Reporting Entities issued by the Federal Government for the Act. This continuum of conduct approach explains how a company may cause, contribute to or be directly linked to modern slavery.

### Operations

We have assessed our direct workforce as being of low risk to modern slavery and believe our internal policies and practices further mitigate this risk.

We have also put in place various policies and processes (see 'Our approach' section

on page 16) to help mitigate potential modern slavery risks relating to our broader operations. This includes continuing our cross-regional operations working group, which seeks to identify risks such as the broader potential for modern slavery to occur on our motorways (see CCT operations pilot case study on page 11).

### Supply chain

We consider that our greatest risk of involvement in modern slavery is being directly linked to it through our supplier relationships. Therefore, our modern slavery work has focused primarily on our supply chain.

Given the size and complexity of our supply chain, the focus for our Program in FY21 has been on direct Tier 1 suppliers. We are continuing to build our understanding of our supply chain beyond Tier 1, with an initial focus on our higher risk categories, which will inform future risk mitigation actions (for example, see case study on progress with ISCA coalition on page 23).

We also expanded our risk assessment processes to incorporate Sydney's M5 West during the course of FY21 (as we commenced our operational integration program in FY20). Our assessment found significant overlap in the categories procured for the M5 West.

In FY21, we have continued to draw upon a combination of the following external resources to better explore our potential supply chain risks by looking at key commodities, sectors, industries, geographical areas and specific organisations. These include:

- [Global Slavery Index 2018](#)
  - [U.S. Department of Labor's 2020 List of Goods produced by Child Labor or Forced Labor](#)
  - [Baptist World Aid Australia 2016 Electronic Industry Trends](#)
  - [Responsible Construction Leadership Group Modern Slavery in Construction report](#)
  - [Online Register for Modern Slavery Statements](#) (to view certain supplier submissions online)
  - Various public articles, including media
  - Any relevant information submitted to our independent whistleblower service
- Information submitted from suppliers in line with standard response schedules issued by Transurban Procurement during sourcing events was also used. This included a review of annual spend against each commodity and supplier to better assess our ability to leverage and influence changes in the market within the categories considered potentially higher risk for modern slavery.

*We also recognise the need for a broader view when assessing human rights*

### Identification process

We assess these risks through a series of workshops which have been running annually since FY18, and which were also undertaken in FY21. The following indicators were the primary source used to identify and assess actual and potential supplier risk.

## Risk indicators

To identify areas of highest risk within our supply chain, we considered the adjacent risk indicators for the potential occurrence of modern slavery.

As part of our risk assessment process, which was refreshed in FY21, we determined that 17 categories ranging across areas linked to technology, infrastructure, major project construction and corporate services, were potentially of higher risk. As a result of our risk assessment processes highlighted above, the following categories continued to be prioritised through FY21:

- **onsite cleaning services**—onsite cleaning services have been prioritised due to the complexity of the market, nature of the labour force, and historical operational practices in the industry—see case study on page 19
- **major project construction materials**—major project construction materials have been prioritised as many materials used in construction (including those that have been imported) can also involve significant modern slavery risks—see case study on page 23
- **promotional items**—promotional items (the majority of which are imported) have been prioritised as external reports have consistently outlined that the labour force in industries such as textiles, including those harvesting and processing raw materials, are vulnerable to modern slavery—see case study on page 13

Learnings from these areas continue to support future expansion of our efforts into other categories as part of our continuous improvement approach.

*Figure 2: Risk indicators*

*Supply chain modern slavery risk* ➤

### *Country profile*

The geographical location of a particular commodity can be an important indicator of risk based upon the vulnerability of the population, and associated government response

### *Sector / industry profile*

The nature of work performed and required worker skill set, as well as product characteristics can all be key indicators of risk

### *Category profile*

The total number of suppliers used, and annual spend data in each category can provide an indicator for the leverage available within the marketplace

### *Supplier profile*

The historical performance and due diligence performed by a particular supplier and / or entity on modern slavery risk can become an important indicator for consideration

### *Key outcomes*

In FY21, Transurban did not identify any instances of modern slavery in our operations or supply chain. We acknowledge that this does not mean modern slavery was not present, and that we are still evolving our ability to identify modern slavery instances in our operations and supply chain.

# Our approach

## Governance

As part of our established Governance protocol, each of the Transurban Parent Group, Transurban Queensland Group and Airport Motorways Group (as defined in Appendix A) are overseen by a Board of Directors with direct responsibility for the relevant reporting entities. The Transurban Parent Group Board is also responsible for overseeing Transurban overall. The Transurban Procurement team is responsible for operational management of the Sustainable Procurement Program. During FY21, each relevant group board and the Transurban Executive Committee received regular progress updates on the Program.

We have also continued our internal working group to support and expand this Program with senior representatives from departments including Procurement, Sustainability, Corporate Affairs, Risk and Legal.

## Policy foundation

Consistent application of policies and procedures across our operations and supply chains is also key in our approach to managing the risks of modern slavery. Transurban policies, and the standards applicable to our employees, contractors and suppliers, are set centrally to create a common baseline for expectations and consistency across the group. Where businesses outside Australia are subject to specific local law requirements requiring them to adopt their own policies, they must ensure that those policies are aligned to the extent possible with the approach taken by Transurban Parent Group.

Our employee **Code of Conduct** establishes not only base principles linked to our core values, but also encourages our people to seek continuous improvement and challenge themselves to find better ways of working. Our aim is to create an environment where everyone is treated respectfully and encouraged to fulfil their potential.

Transurban uses a ‘continuous listening’ platform and approach, which enables management to engage more regularly with their staff to better understand what is important to them.

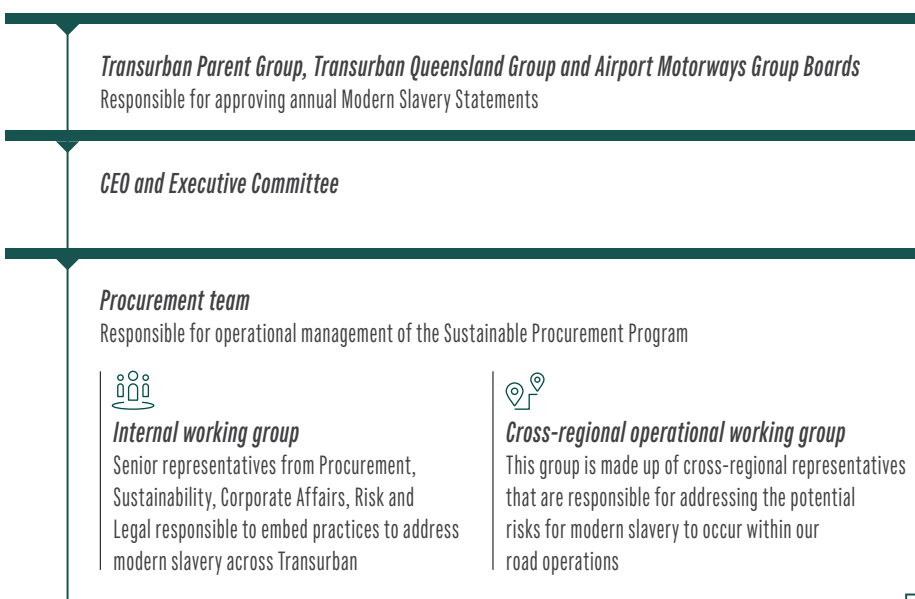
In addition to the **Code of Conduct**, the following policies and codes set our clear expectations to respect human rights, including in relation to modern slavery:

- **Sustainability commitments**
- **Supplier Sustainability Code of Practice**—applies to all new and existing suppliers, outlines both our minimum and leadership standards (including human rights), and encourages suppliers to go beyond legal compliance in order to advance their social and environmental responsibility
- **Whistleblower Policy**
- **Diversity Policy**
- **Privacy Policy**
- **Ethical Business Practices Policy**
- Employee Policy Handbook (USA and Canada only)
- Procurement Policy (internal only)—this policy commits the company to advance alignment with ISO 20400, and to include sustainability considerations in the sourcing process (including human rights)

We continue to regularly review and update these policies as required, and in FY21 we established a **Human Rights Policy**. Whilst Transurban already had a comprehensive set of policies and procedures to help address internationally accepted human rights requirements, we wanted to develop an overarching policy that succinctly articulated what we stood for in this area. Our internal working group provided significant input so that it addressed cross-functional aspects of our business operations and supply chain.

We also have a number of other avenues to gather further information and document our decision-making processes, especially with regards to supply chain sourcing decisions (see ‘Due diligence processes’).

Figure 3: Internal working group structure





## Due diligence processes

Our due diligence processes assess and respond to human rights risks including in relation to modern slavery. With a dedicated Sustainable Procurement Manager role in place, our aim is to bring consistency to our approach when assessing these risks and developing an appropriate response. Our key due diligence activities include:

### Sourcing toolkit and assessment

Sustainable procurement practices are built into our standard approach each time a sourcing lead from the Procurement team is involved. Considerations such as human rights risk, including modern slavery, form part of our business process at each stage from inception of our sourcing strategy through to execution of final contracts. For example, the Procurement team will typically get involved with sourcing transactions with a spend over a certain threshold, and issue the tenderers with a self-assessment questionnaire, which will include sections covering Sustainable Procurement. The response tabled by the tenderer will form part of the evaluation process, and the sourcing lead can also engage with the Sustainable Procurement Manager to allow for a consistent approach to be followed.

Where a particular commodity or supplier is determined to be potentially higher risk for modern slavery, additional assessment and supplier engagement is expected to be carried as a way of further understanding our risks and driving positive change through our supply chain (see case study on page 19). In addition, during FY21 we implemented additional controls to guide low value purchases for potentially higher risk categories of goods and services for modern slavery. This was managed through

the development of internal analytics tools to interrogate low value purchase order and corporate credit card spend data. We will keep these items under review for future periods in line with our continuous improvement approach.

### Contractual clauses

We have continued to refine and update our standard contractual clauses to be used in new supplier contracts in Australia and the United States, for categories of goods and services classified as potentially higher risk for modern slavery (as identified through our risk assessment processes outlined on page 14). These clauses clearly set out our expectations for the supplier to use all reasonable endeavours to prevent and respond to modern slavery in its own supply chain and activities. We understand that continued engagement with our suppliers is important to learn more about their practices to meaningfully address their modern slavery risks.

### Ethical business practices

We recognise that modern slavery can include a range of exploitative human rights practices, and that it may also be connected to other serious criminal activity such as fraud, bribery and corruption. Transurban has an Ethical Business Practices Policy that supports its governance and integrity framework. This policy defines the standard required from employees and third parties when working with Transurban and highlights the processes for prevention, detection and the investigation of reports of fraudulent or corrupt conduct (including those related to modern slavery). The policy and related frameworks are supported and reinforced by formal training and awareness programs across the business (discussed further below) and proportionate disciplinary action if breached. All material breaches of this policy are reported to the group board for the relevant business.



Governance



Due diligence processes



Remediation processes



Training and capacity building

# Our approach

(Continued)

## Remediation processes

We recognise the importance of remediation in line with UN Guiding Principles on Business and Human Rights. Where we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for or cooperating in its remediation through legitimate processes. For example, Transurban may exercise any contractual or other legal rights available to it to address any adverse human rights actions or incidents in which we may be involved, including in relation to any issues concerning modern slavery. Key processes that we continued to support remediation activity in FY21 include:

### Independent grievance mechanism for reporting potential issues

Our independent external whistleblowing hotline service is available for anyone to use, including employees, customers and members of our supply chain to raise issues including those related to fraud, conflicts of interest, bribery, corruption and modern slavery. It can be accessed via a toll-free hotline telephone number, online, by web-based access or post. An external report may be made anonymously, if desired, using any of these methods. In FY21, we continued to expand our communications around the availability of this service to our onsite cleaning contractors (see case study on page 19), and held a meeting with our external provider to assess their ability and training to process potential cases related to modern slavery.

### Remediation guidelines

During FY21, we continued to refine our remediation guidelines to help our staff take appropriate steps, if modern slavery

practices are identified in our supply chain. We recognise that these issues can be complex and sensitive to navigate, so these guidelines are designed to prioritise the protection and support of identified victims. The guidelines include making sure that we clearly log the issue, allocate responsibility for investigations with appropriate timelines and define protocols for handling business relationships with suppliers in accordance with our contractual rights, up to and including the complete termination of the relationship and referral to the appropriate authorities. The guidelines are available on our intranet for all employees and are intended to be improved and developed as required.

This additional training covered:

- key risks surrounding modern slavery
- stories from survivors of modern slavery
- information on how modern slavery can be embedded deep within the extended supply chain
- key policies governing our approach to these risks

*Awareness raising, training and capacity building are important for both our employees and our supplier partners to be better equipped to identify and respond to modern slavery risks*

## Training and capacity building

Awareness raising, training and capacity building are important for both our employees and our supplier partners to be better equipped to identify and respond to modern slavery risks. During FY21, all Transurban employees completed mandatory online training on our Ethical Business Practices and Whistleblower policies, which raise awareness on how to identify instances of modern slavery. In addition, an annual Code of Conduct attestation process was introduced so that employees continue to understand their obligations in relation to the Code of Conduct and any changes made as part of our annual review process.

We also expanded our mandatory training on modern slavery to cover all employees.

- signs to watch out for that may indicate the presence of modern slavery
- who to contact for further assistance via a dedicated and monitored internal communication channel (in addition to our independent whistleblower service).

Detailed training workshops on modern slavery, and key requirements under the Act were also held for all Procurement and several key contract managers as part of our wider Program.

In addition, the Sustainable Procurement Manager held workshops with key representatives from across our supplier base (and wider industry groups), to build our respective working knowledge and capacity to address modern slavery risks. We believe that a key aspect of any successful approach requires us to work closely with like-minded industry partners to avoid taking a fragmented approach to the market (see multi-stakeholder engagement on page 23).

–Case study–

## Onsite cleaning services

*Onsite cleaning services have been identified as a high-risk category through our risk assessment process.*

The cleaning industry is known for its susceptibility to labour exploitation and other forms of modern slavery. Transurban currently operates offices across 32 locations, with approximately 79 cleaners engaged daily both as a direct service (Tier 1), or indirect (Tier 2) service through our office landlord.

Through the course of FY21, the following processes were applied with our onsite cleaning service providers:

- We continued to engage with various industry peers to learn more about their practices in managing modern slavery risks within their supply chain, especially relating to onsite cleaning services

- We conducted a national cleaning tender in Australia with a heavy focus on practices to manage modern slavery risks throughout the tendering process, up to and including contract award
- We engaged with our cleaning service providers and asked them to complete our self-assessment questionnaire, including conducting interviews with key personnel, to gain a better understanding of their practices to address modern slavery risks. In particular, we placed an emphasis on gaining a better understanding of their recruitment and subcontracting practices, verification processes to manage the correct payment of wages, and the ability of their staff to raise grievances
- We collaborated with our onsite cleaning suppliers throughout the year to give them a better understanding of our expectations, and build stronger relationships for further improvement in our processes in the future

- We installed posters within our onsite cleaner cupboards across our corporate facilities nationally, to remind cleaning workers that they have the ability to access the Transurban independent Whistleblower service if they wished to raise a concern.

Throughout the course of FY21, we found varying levels of maturity with each supplier on their ability to proactively manage modern slavery risks based on their size, location and jurisdiction. We believe that the efforts undertaken this year will set a good foundation for further learning and improvement to better manage risks in this category.





# Response to COVID-19

***Like most businesses, Transurban continued to be impacted by the COVID-19 pandemic throughout the course of FY21.***

As a long-term operator of critical road infrastructure, we operated our road networks and major projects through the period and in accordance with government mandated restrictions. We continue to have a range of work options available to all employees when they need, including flexible working hours or job share arrangements. We are proud of our workspaces that are designed to foster collaboration and welcomed our people back to the workplace as circumstances permitted across our markets.

We were able to continue the majority of our modern slavery workshops and working group sessions through a blend of face-to-face meetings and online forums as appropriate. However, we were unable to complete a face to face workshop with our traffic control room operators and crew members from the Ventia's Incident Response team at the CCT due to the pandemic related restrictions in Sydney in June 2021 (see CCT operations pilot case study on page 11). Our plan is to complete this workshop in FY22 once restrictions have been lifted.

Transurban was also able to keep working closely with our existing suppliers to manage potential supply chain risks with the aim of maintaining our human rights requirements through our Supplier Sustainability Code of Practice and contract clauses. We recognised the significant financial impact to our small business suppliers across both our Australian and North American markets

and completed our temporary program to expedite payments to our small business suppliers and reduced our standard payment terms from 30 to 14 days. During FY21, expedited payments were made to more than 500 suppliers.

As noted in our FY20 statement, we were unable to place physical posters promoting our whistleblower service across our offices last year although these details continue to be available on Transurban's intranet and external website. This activity was successfully completed in FY21, and posters are now present across our corporate facilities nationally in locations that are readily visible to onsite cleaning staff.





# Measuring effectiveness

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

We seek and receive feedback from both internal and external sources including employees, suppliers, investors, industry groups, external specialist consultants and NGOs. During FY21 we have continued to evolve and mature our processes to measure the impact and effectiveness of our efforts using the following metrics. In particular, our learnings have focused us on expanding our collaboration with suppliers to better understand and work with their extended supply chain (beyond Tier 1) and continuing to refine our key processes around effective grievance mechanisms.

Workstream	Activity	Performance Indicators
<b>Governance</b>	Reviews of Policies related to human rights	Policy reviews completed per annum
	High-risk category contracts with modern slavery provisions	% of contracts with provisions for categories of goods and services considered high-risk for modern slavery
	External benchmarks	Results in the Dow Jones Sustainability Index and Global Real Estate Sustainability Benchmark for Infrastructure, MSCI ESG rating
	Internal audit on controls	Completion of internal audit actions that relate to our approach to assessing and addressing modern slavery risks
	Internal and Cross-Regional working groups	Number of meetings per annum for working groups
	Procurement KPIs to address modern slavery risks	Performance rating against annual KPI
	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 all sourcing activity managed directly by the Procurement team per annum
<b>Risk Management</b>	Risk assessment	Number of human rights including modern slavery risk reviews completed per annum
	Risk register tracking	Number of risk register reviews regarding modern slavery completed per annum
	Testing our approach with the UN Global Compact and ISCA Coalition membership, NGO's and Investors	Number of collaborations and investor engagements that included modern slavery per annum
<b>Monitoring</b>	Issues raised through our grievance mechanisms	% of substantiated issues investigated and remediated per annum
	Employee "Our Voice" survey. We conduct an annual employee opinion survey to gather feedback around confidence in leadership, our customer focus, commitment to diversity and inclusion, and more.	"Our Voice" survey results

We plan to continue to assess the effectiveness of these metrics, identify gaps, and incorporate changes in line with our continuous improvement approach.

—Case study—

## Engagement with key investors

***AustralianSuper manages more than AUD225 billion of members' retirement savings on behalf of more than 2.4 million members from around 350,000 businesses as at June 30 2021.***

One in 10 working Australians are a member of AustralianSuper, the nation's largest superannuation fund. In addition, AustralianSuper believes investing in companies with good Environmental, Social and Governance (ESG) management provides better long-term returns for members. AustralianSuper is a co-investor with Transurban in our Chesapeake (USA), Transurban Queensland and WestConnex toll road assets.

AustralianSuper's ESG and Stewardship team began engaging closely with Transurban on its Sustainable Procurement Program in 2018, as part of their regular ESG review of Transurban's sustainability practices.

AustralianSuper representatives sit on the Boards of the entities in which they have co-invested in alongside Transurban, which allows them to oversee the Program as part of our governance processes. Transurban management regularly shared detailed presentations and updates to AustralianSuper representatives over this time period (including during the FY21 financial year).

This close level of engagement with key subject matter experts from AustralianSuper has helped us to shape and direct our approach from the early origins of the Program, including our work to address modern slavery. AustralianSuper has the benefit of overseeing numerous programs within its portfolio companies, and thus are in the position to share valuable insights about best practice and areas for improvement, which they have consistently done throughout our engagements. As an example, on-site cleaning services were a topic of detailed discussion, as it was identified as a high-risk category for both organisations. Further information on the work that we have conducted to better address our risks around cleaning services can be found on page 19. In addition, Transurban requested the AustralianSuper ESG and Stewardship team review early drafts of both our FY20 and FY21 Modern

Slavery Statements, which allowed us to obtain independent feedback on the content and approach outlined within our documentation.

We believe that this engagement has served to make our Program far more robust and effective and will provide long term value to both parties. It also provides AustralianSuper with deeper transparency into our work and an ability to influence our direction to achieve increased ESG performance and deliver better investment outcomes for members.

***“As a super fund investing on behalf of members, AustralianSuper understands the importance of addressing modern slavery risk in our investee companies and assets. Our engagement with Transurban has provided invaluable insights into the company's approach to managing and reporting its modern slavery risks. Garnering and sharing insights from assets across our portfolio helps us develop best practice approaches and a consistent framework to identifying and mitigating slavery risk in the Fund's investments.”***

—AustralianSuper



# Multi-stakeholder engagement

*We contribute towards modern slavery policy development and collaborate on activities<sup>11</sup>*

During FY21 Transurban representatives regularly participated in industry initiatives to share knowledge and learn from each other. We also undertook joint initiatives with industry groups to drive stronger and more coordinated outcomes across the community.

Key activities progressed during FY21 include:

- Actively participated in multi-stakeholder sessions to discuss human rights issues, including modern slavery, including the UN Global Compact Network Australia's (GCNA) Modern Slavery Community of Practice
- Participated in the UN GCNA Effective Modern Slavery Grievance Mechanisms workshop
- Engaged with Anti-Slavery Australia to help develop a pilot program for our operations and Incident Response crews—see page 11
- Partnered with ISCA to continue the Modern Slavery Road Construction Industry Coalition. Although the construction industry has been impacted by government mandated restrictions in response to the COVID-19 pandemic, the Coalition has continued to meet regularly throughout this period (see ISCA coalition in the following case study)
- Supported research being conducted by Monash University and Independent Research Consultant, Heather Moore into the development of an effective modern slavery remediation model for Australian businesses

<sup>11</sup> All external engagement initiatives are conducted having regard to applicable laws, including the Competition and Consumer Act 2010 (Cth).

*—Case study—*

## Major project construction materials

*Major project construction services were identified as a high-risk category through our risk assessment process.*

During the reporting period, we worked collaboratively with key business peers to strengthen our response to modern slavery through the Infrastructure Sustainability Council of Australia (ISCA) Road Sector Modern Slavery Coalition. The Coalition was established by ISCA in 2019 to support businesses to assess and address modern slavery risks in the road infrastructure sector and focuses on: supporting collaborative solutions to modern slavery risk management; driving industry good practice to

support compliance with the Act; and building members' capacity to manage modern slavery risks. As part of its work programme over 2020/21, the Coalition identified and engaged with two pilot supply chains, PPE and bitumen, in order to understand potential modern slavery risks associated with the procurement of these products.

*“It is the right time for the road infrastructure industry to be proactive as well as look for collaborative solutions. With significant growth in the Australian road infrastructure sector, the recent modern slavery legislation as well as increasing expectations from external stakeholders—including investors, customers and civil society—companies in the road sector need to be able to know and show that they are managing their modern slavery risks.”*

*—Independent Chair Vanessa Zimmerman*



# Approval

## Consultation

Transurban operates as an integrated group of companies 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 Modern Slavery 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 working groups for modern slavery risk management, which include representatives from across a broad range of functions who have responsibilities across the reporting entities and their controlled entities (including Operations, Sustainability, Corporate Affairs, Risk and Legal).

During FY21, the Procurement team also presented to each of the Boards of Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group on the status of relevant Procurement practices and the preparation of this statement under the Act. This Modern Slavery Statement has also been reviewed by the Executive Committee of Transurban, and executive representatives from the Transurban Queensland Group and Airport Motorway Group, prior to being put to each relevant group boards for review and final approval.

This joint Modern Slavery 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 Transurban Group<sup>12</sup> for the Transurban Parent Group on 18 August 2021,
- The Board of Transurban Queensland<sup>13</sup> for the Transurban Queensland Group on 31 August 2021, and
- The Board of Airport Motorway Limited for the Airport Motorway Group on 15 September 2021.



**Lindsay Maxsted**

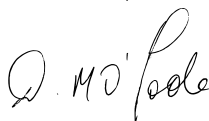
*Chairman, Transurban Group*



**Scott Charlton**

*Chief Executive Officer, Transurban Group*

As representatives of the Transurban Parent Group



**Deborah O'Toole**

*Chairman, Transurban Queensland*

As a representative of the Transurban Queensland Group



**Raymond Golzar**

*Chairman, Airport Motorway Limited*

As a representative of Airport Motorway Group

<sup>12</sup> The "Board of Transurban Group" means each of the Boards of Transurban Holdings Limited, Transurban International Limited and Transurban Infrastructure Management Limited as the responsible entity of Transurban Holding Trust.

<sup>13</sup> The "Board of Transurban Queensland" means each of the Boards of Transurban Queensland Holdings 1 Pty Ltd and Transurban Queensland Holdings 2 Pty Ltd. Transurban Queensland Holdings 2 Pty Ltd is not a reporting entity for the purposes of this statement.



# 25 Appendices



# 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'); and
- Transurban Infrastructure Management Limited ACN 098 147 678 ('TIML') as the responsible entity of Transurban Holding Trust (ARSN 098 807 419) ('THT') and the Trustee for the City Link Trust (ARSN 096 270 085);
- 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 International Holdings Pty Ltd ACN 155 004 121;
- Transurban Sun Holdings Pty Limited ACN 169 039 776, and
- Transurban WGT Co Pty Ltd ACN 617 420 023,

(together, referred to as the 'Transurban Parent Group')

- Transurban Queensland Holdings 1 Pty Ltd 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; and
- Queensland Motorways Pty Limited ACN 067 242 513,

(together, referred to as the 'Transurban Queensland Group'), and

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

(together, referred to as the 'Airport Motorway Group').

Further details on Transurban roads and projects managed by the reporting entities outlined above are covered in the FY21 Corporate Report, which can be located at [transurban.com](https://www.transurban.com)

# Appendix B

<b>Mandatory reporting criterion</b>	<b>Reference in this statement</b>
Identify the reporting entity	<ul style="list-style-type: none"> <li>• Transurban reporting entities under the Act—see page 3</li> <li>• Appendix A—see page 26</li> </ul>
Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"> <li>• About Transurban—see page 6</li> <li>• Our structure and operations—see pages 8-10</li> <li>• Our supply chain—see page 12</li> </ul>
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	<ul style="list-style-type: none"> <li>• Modern slavery risks—see pages 14-15</li> </ul>
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	<ul style="list-style-type: none"> <li>• Our approach—see pages 16-18</li> <li>• Multi-stakeholder engagement—see page 23</li> <li>• Measuring effectiveness—see page 21</li> </ul>
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	<ul style="list-style-type: none"> <li>• Measuring effectiveness—see page 21</li> </ul>
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	<ul style="list-style-type: none"> <li>• Consultation—see page 24</li> <li>• Approval—see page 24</li> </ul>
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"> <li>• Our broader sustainability efforts—see page 3</li> <li>• Multi-stakeholder engagement—see page 23</li> </ul>

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