

Modern Slavery Statement 2022

Our commitment

Right now, around the world, an estimated 50 million people¹ are trapped in modern slavery, including forced labour. And this form of human rights abuse is increasing over time¹, including here in Australia.

This is our third modern slavery statement, and this year's statement details our work in refining and enhancing our approach. This included expanding on our training across our business, leveraging human rights experts and collaborating with our suppliers to raise awareness.

We developed a business leadership group to provide additional governance, guiding and supporting how we identify, assess, and respond to potential modern slavery risks.

We also increased our engagement with industry partners and peers to share knowledge and collaborate on actions to raise awareness upstream through our supply chains.

In FY22, we did not identify any instances of modern slavery in our operations or supply chain. We acknowledge this does not mean modern slavery was not present, and that we are still evolving our ability to identify actual or potential modern slavery instances in our operations and supply chain, as well as situations which may occur on our road network.

Looking ahead, we will expand the work we have done so far and will continue sharing knowledge with our industry partners to respect and protect human rights.



Andrew Head
Group Executive, WestConnex

¹ [International Labour Organization, Walk Free, and International Organization for Migration, Global Estimates of Modern Slavery, Forced Labour and Forced Marriage, 2022, p2](#)

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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:

FY22 Corporate Report²

The holistic performance of Transurban in FY22 including Financial Statements and Sustainability Supplement.

FY22 Sustainability Data³

Progress against the UN Sustainable Development Goals (SDG) and other sustainability performance data.

Corporate Governance Statement

Statement made in accordance with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition).

FY22 Climate Change Disclosure³

Response to the Task Force on Climate related Financial Disclosures' (TCFD) recommendations.

Reconciliation Action Plan

Financial Inclusion Action Plan

The Transurban Insights hub provides detailed information on relevant safety and sustainability approaches and performance.

See [insights.transurban.com](https://www.insights.transurban.com)

² Some of the Sustainability Supplement has been integrated into the FY22 Corporate Report. This approach provides additional information on non-financial performance (including environmental, social and governance performance) and progress in achieving our Sustainability Strategy

³ Previously incorporated in the Sustainability Supplement

Acknowledgment of Country

Sydney Transport Partners and WestConnex acknowledge the Traditional Owners of the lands across Australia—in particular where we own and operate toll roads—and we pay respect to Elders past, present and emerging.

As caretakers and custodians of transportation in urban communities we have a deep respect for Indigenous communities and culture and seek to celebrate pride in Country through engagement with, and providing opportunities for, Aboriginal and Torres Strait Islander peoples. We also celebrate connection to Country through partnerships, artwork and design elements in our infrastructure.

We will continue to foster positive and sustainable relationships with all communities, while progressing our efforts to contribute to Australia's reconciliation journey.

Reporting entities under the Act

This statement is prepared for the purposes of the *Modern Slavery Act 2018 (Cth)* (Act) and is filed collectively for each of the 'Reporting Entities' (identified in Appendix A) forming part of the Sydney Transport Partners Group ('STP' or 'STP Group'). As explained below, WestConnex is 100% owned by STP. This statement is therefore submitted by STP on behalf of each of the 'reporting entities' identified in Appendix A. In this Statement, the terms "we", "us", "our", "the company", and "the Group", are used where reference is made, in general, to the reporting entities. The use of these terms is for convenience only and used where no useful purpose is served by identifying any particular entity and is not intended to convey how each entity is structured, managed or controlled.

Consistent with previous years, during the reporting period the Transurban Sustainable Procurement Program (the Program) was deployed to assist WestConnex with the management of its modern slavery risks, led by Transurban's procurement team. Transurban will be lodging its own separate modern slavery statement under the Act. As a result, there is a substantial amount of overlap across each of these statements. Statistics and data presented in this statement will only include those businesses related to STP and WestConnex, unless otherwise stated.

This is STP's third Modern Slavery Statement. WestConnex, prior to its acquisition (by STP) and for previous reporting periods, had previously submitted its own Modern Slavery Statement. WestConnex, now 100% owned by STP is no longer submitting its own Modern Slavery Statement. This statement is submitted by STP as the highest reporting entities and on behalf of WestConnex.

FY18

Transurban Sustainable Procurement Program established and aligned to ISO 20400:2017.

Commenced working with our suppliers in anticipation of the 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 (ISC) to establish the Modern Slavery 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 (FY20).

With Transurban, developed an operations pilot program to support incident responders to better identify and respond to potential instances of modern slavery within our road asset operations.

FY22

Published our second Modern Slavery Statement (FY21).

Reviewed and strengthened tools and processes used to assess and address modern slavery risks.

Piloted first responders training to identify and escalate potential or actual instances of modern slavery.

FY22 in review

Modern slavery involves the exploitation of human beings, and we recognise 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. During the 2021–22 financial year (FY22), we progressed multiple initiatives designed to enhance our understanding of—and responses to—modern slavery risks.

This is our third Modern Slavery Statement published in accordance with the Act. During the FY22 reporting period we endeavoured to build on the actions we reported in our previous statements.

During FY22 we:

- reviewed our efforts to date to assess and address modern slavery risks
- integrated our current actions and tools into our operations to improve their efficacy
- increased our people's awareness, engagement and training.

Key actions we took included:

- formalising our governance leadership group that works internally to transform and embed actions we take to assess and address modern slavery risks (see page [12](#))
- refining our risk management approach by aligning and optimising the tools we use to enhance how we identify modern slavery indicators and use these indicators to prioritise our actions to address these risks (see page [13](#))
- providing increased training to targeted internal teams to enhance their knowledge of modern slavery, in their specific areas, including piloting training with a group of our Traffic Control Room Officers (TCRO) and Incident Response Crew (IRC) to aid in identifying potential or actual situations of human trafficking (see page [14](#))
- engaging with various stakeholders to share knowledge and promote industrywide actions to tackle modern slavery (see page [16](#)).

In FY22, STP and WestConnex 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 we are still evolving our ability to identify actual or potential modern slavery instances in our operations and supply chain, as well as situations which may occur on our road network

More than 99% of our direct spend was with direct (Tier 1) suppliers who are located in Australia

We piloted training, the first of its kind in Australia, to a group of our TCRO and IRC team members providing them with skills to identify and escalate potential or actual instances of human trafficking occurring on our motorways

** Any reference to "risks" within this statement refers to the modern slavery risks to people unless otherwise described. For more information on STP, WestConnex and Transurban's corporate and sustainability risks and responses see the Transurban FY22 Corporate Report

About us

Our structure

Sydney Transport Partners

STP Group comprises the STP Asset Trust and the STP Project Trust. Along with our trustees, who are Australian proprietary companies, we act as a holding vehicle for a consortium of investors' interests in the WestConnex motorway network in Sydney, New South Wales.

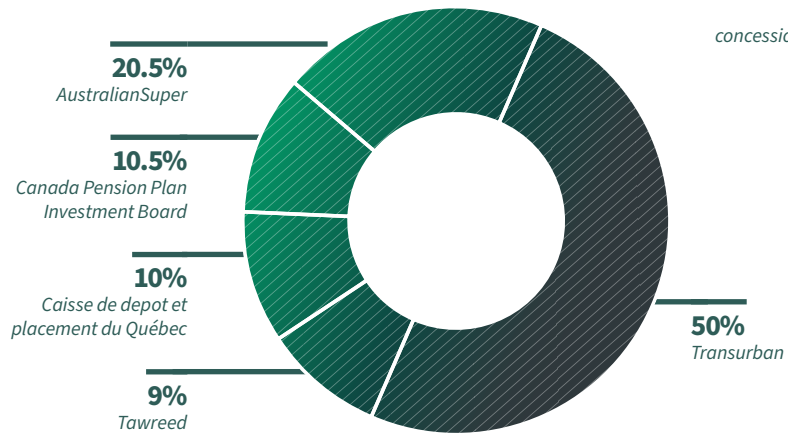
In 2018 Sydney Transport Partners (STP) acquired a 51% stake in WestConnex from the NSW Government. In October 2021, STP acquired the remaining 49% equity stake from the NSW Government taking STP's total ownership interest to 100%.

The trustees of the STP Group trusts are registered in Sydney. However, as the STP Group is purely an investment vehicle, the trustees do not have their own offices or employees or undertake any significant activities in their own right. STP Investors are jointly responsible for decision making in respect of the STP Group.

WestConnex

WestConnex is one of Australia's largest road infrastructure projects and, once complete, will connect Sydney's west and southwest suburbs with the city centre, via a 33-kilometre traffic-light-free motorway. WestConnex also links Greater Sydney to major international gateways at Sydney Airport and Port Botany, and the future Western Harbour Tunnel, Beaches Link and M6 Motorway. WestConnex is 100% owned by STP Group and is operated by Transurban.

The STP Investors comprise



Transurban

Transurban is one of the world's largest toll-road developers and operators, operating toll roads in Melbourne, Sydney and Brisbane, as well as in the Greater Washington area in the United States and Montreal in Canada. Transurban owns 50% of STP and is the appointed operator of WestConnex. Transurban also provides general corporate services to the STP Group including tax, accounting and company secretarial services.

Transurban is lodging its own modern slavery statement for FY22 under the Act, which will be available on its website at [transurban.com](https://www.transurban.com) (the **Transurban Modern Slavery Statement**). The Transurban Modern Slavery Statement details the governance and risk management processes and policies that Transurban applies in relation to its supply chains and operations (including as they relate to STP Group and WestConnex). This STP Group Statement details the governance and risk management processes and policies that STP Group applies in relation to its own operations and supply chain, inclusive of WestConnex.

3 operating assets
2 projects in delivery

M5 West

to be part of the WestConnex network when the current concession expires in 2026

Our operations

STP's operations principally relate to the management of WestConnex, working in collaboration with governments, business partners and suppliers to design, construct and operate the WestConnex road network. As each stage of the project is commissioned, Transurban (part owner of STP Group) is responsible for overseeing the network operations.

WestConnex is being delivered in four major stages:

- M4 opened in 2019
- M8 opened in 2020
- M4 and M8 link opening in 2023
- Rozelle Interchange (delivered by NSW Government) opening in 2024

Further details of WestConnex, including our roads and projects can be found at westconnex.com.au or in the [Transurban FY22 Corporate Report](#).

WestConnex toll roads provide key transport connections for people and freight and is a critical part of the broader plan to get Sydney, and Australia, moving again. Along with the NSW Government's record investment in public transport infrastructure, WestConnex is easing congestion, creating tens of thousands of jobs, and connecting communities.

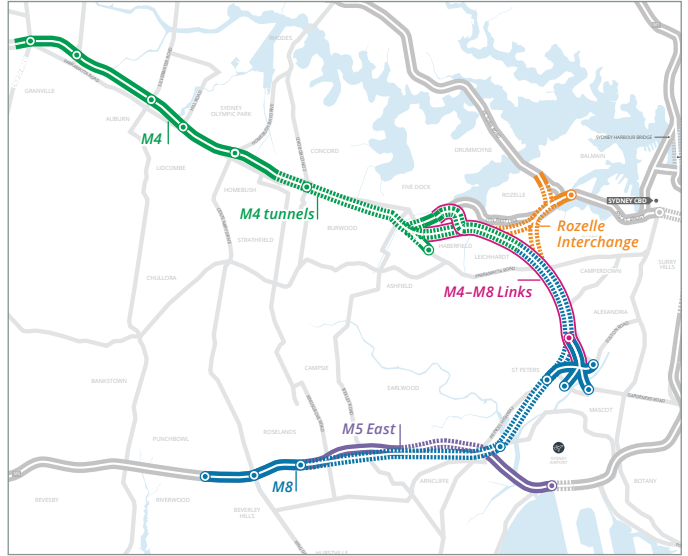
Mostly underground, WestConnex is freeing up large areas in communities and creating 18 hectares of parks, playgrounds and recreational facilities. In addition, WestConnex is planting more than 1 million trees and plants.

The road infrastructure is delivered alongside parks, cycling and pedestrian paths, playgrounds and public art. These initiatives contribute to the long-term liveability of local communities and enhance cities' overall active transport options.

Through collaboration with contractors and sub-contractors, projects are developed in line with applicable government technical, sustainability and social procurement requirements. Once a newly built road is commissioned into service (including being integrated into the wider network) Transurban operates the road using state-of-the-art technology designed to provide safe and efficient traffic flows.

Dedicated teams of TCROs monitor the roads 24/7, working closely with suppliers' IRCs. IRCs respond to incidents to maintain safe and efficient operations and to support impacted customers. Together with Transurban's suppliers, WestConnex manages the maintenance and operations over the concession periods. Currently there are close to 40 years concession life remaining¹. At the conclusion of the applicable concession period, assets are handed back to the NSW Government.

All operating WestConnex assets are managed by Transurban's back-office tolling system and use smart motorway technologies to improve traffic flow or respond to road conditions. Transurban's Linkt retail tolling provider is the 'preferred retailer' across all WestConnex assets.



westconnex.com.au

WestConnex M4²	50%	Transurban	14 km
	20.5%	AustralianSuper	
	10.5%	CPPIB	
	10%	CDPQ	
	9%	Tawreed	
WestConnex M8²	50%	Transurban	11 km
	20.5%	AustralianSuper	
	10.5%	CPPIB	
	10%	CDPQ	
	9%	Tawreed	
M5 East²	50%	Transurban	10 km
	20.5%	AustralianSuper	
	10.5%	CPPIB	
	10%	CDPQ	
	9%	Tawreed	

Projects

WestConnex M4-M8 Link^{2,3}	50%	Transurban	7.5 km
	20.5%	AustralianSuper	
	10.5%	CPPIB	
	10%	CDPQ	
	9%	Tawreed	
WestConnex Rozelle Interchange⁴	50%	Transurban	5 km
	20.5%	AustralianSuper	
	10.5%	CPPIB	
	10%	CDPQ	
	9%	Tawreed	

¹ Remaining concession life as at 30 June 2022 for each concession on a non-revenue weighted basis with each concession expiring in December 2060

² The proportional ownership of WestConnex described in this statement were effective from 29 October 2021

³ Will be known as M4 and M8 link once opened

⁴ Rozelle Interchange is being delivered and funded by Transport for NSW

Our people

STP does not have employees, offices or operations itself. Our WestConnex business employs a small number of staff directly, but also shares a number of staff across the Transurban business tasked with managing the WestConnex operations and supply chains.

150⁺
direct workforce⁴

100%
employed in Australia

4
direct employees who
are visa holders⁵

Our people work flexibly, primarily from the WestConnex or Transurban offices, site locations, as well as remotely.

Our people, including those shared employees across Transurban, are involved in a broad range of activities ranging from toll road operations and maintenance, major road project delivery, customer service and head office functions such as Customer and Technology, Legal, Risk, HSE, Facilities, Finance, Procurement, Corporate Affairs, Sustainability and People and Culture.

All of the WestConnex direct employees are full-time and employed in Australia, and are covered by industrial instruments including modern awards, Enterprise Agreements, and individual employment contracts. Each of these mechanisms meets or exceeds the minimum entitlements prescribed under the National Employment Standards. The standards set out the 10 minimum employment entitlements that must be provided to all Australian employees.

WestConnex employs a small number of foreign workers with visa status in Australia. These employees are skilled workers, each having direct employment contracts with WestConnex and have the same entitlements as WestConnex domestic resident employees, including: access to grievance channels; training on how to use these mechanisms; options for raising concerns anonymously.

⁴ As at June 30, 2022. Direct workforce includes permanent employees (excluding leave of absence and non-executive directors). WestConnex shares a number of its employees, management and executives across the Transurban business, who are employed by Transurban

⁵ Valid visa types with permission to work. Remaining direct employees have appropriate working rights through citizenship or permanent residency



Our supply chain¹

During the reporting period, STP Group did not procure goods or services in its own right. Rather, any goods and services relating to the operation of STP Group were procured through the WestConnex business or by Transurban as a service provider to WestConnex.

WestConnex supply chain

With three WestConnex assets and two WestConnex projects in delivery, we are in a strong 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 large global multinational construction contractors, key technology providers, consultants, to small local businesses, including social enterprises.

In FY22, in comparison to previous reporting periods, our business did not have any significant changes in the types of goods or services that we procured, and throughout the year, WestConnex engaged with more than 150 direct suppliers. A major milestone was achieved where the M4–M8 Link civil works were completed in FY22, and the project is on track to open to traffic in 2023.

Our top supplier categories for FY22, which constituted over 97% of our total spend were:

- **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, WestConnex will select a lead Design & Construction (D&C) supplier (or consortium) for each project, who will then manage delivery, including appointing numerous subcontractors as necessary, with overarching management of the projects led by WestConnex.

The activities and materials in our major projects include drilling, piling, excavation and tunnel boring, which includes the use of heavy machinery. Mechanical and electrical trades including those responsible for wiring, lighting, pumps, jet fans and installation of our deluge, ventilation and Intelligent Transport Systems (ITS). Engineering, project management, wire mesh, shotcrete and concreting (both precast and in-situ), asphalt (pavement) laying and line marking are also involved.

- **Professional services and corporate management consulting** — These are predominantly desktop-based and include legal, strategy, general business and financial consulting services.
- **Operations and maintenance services** — Provision of ongoing works on our road assets to manage safety and operating standards in line with regulatory and concession deed requirements. Typically, WestConnex will select an Incident Response and Maintenance service provider for each motorway, who will then tailor the delivery of services including civil, mechanical and electrical, and incident response services. This service provision may include appointing subcontractors as necessary. The operations and supply chain maintenance also includes similar supplier engagements as used above during construction, as the road assets are repaired and maintained throughout their lifecycle.

More than
\$600M
in annual managed spend

150+
direct suppliers

More than 99% of our annual spend sits with suppliers whose direct trading site or headquarters are located locally in Australia. However, we recognise that the vulnerability of the labour work force may be greater in the upstream supply chain that WestConnex does not have direct involvement with.

Labour is a critical part of the direct and indirect supply chain to WestConnex, from the maintenance activities on our roads such as landscaping, electrical and mechanical trades, incident response teams, machinery operators, to labour used in the multi-year construction phases of our infrastructure projects, such as truck drivers. Some labour is provided by casual or migrant labour, with labour potentially delivered in shifts.

This type of labour may be used during major project construction activities such as 24/7 tunnelling works. In addition, the maintenance on our road assets often occurs overnight to mitigate disruption for motorists.

We continue to narrow our focus to identify the risks to vulnerable groups and improve our controls to protect people in our supply chain.

¹ All data in this section exclusively relates to WestConnex and STP Group entities.



Procurement team

Procurement at WestConnex is integrated with the wider Procurement team from Transurban, who are charged with wide-ranging responsibilities including category management, strategic sourcing, procurement operations, the Transurban Sustainable Procurement Program and contract management framework, as well as supporting strategic corporate supplier relationships. This team has local personnel based in Sydney, but reports into a central management team based out of Transurban headquarters in Melbourne, Australia.

Sustainable Procurement Program

The Transurban Program was formally established at WestConnex in FY20 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 12.

Extended supply chains beyond Tier 1

Across the WestConnex business we have various levels of knowledge into our extended supply chains beyond our direct contracted suppliers, which we define as Tier 1. Some subcontracted suppliers, beyond Tier 1, are known through requirements in our commercial arrangements, where our Tier 1 suppliers are required to disclose and report on detailed information regarding these subcontractors, including the labour force. In some instances, our Tier 1 suppliers may also be involved in other scope of works where they act as Tier 2 subcontractors in our supply chain.

Through our Sustainable Procurement Program, we also develop shared-value initiatives in collaboration with our Tier 1 suppliers to engage with social enterprises in our extended supply chains. These initiatives help vulnerable people in the community participate in meaningful long-term employment.

In this statement, we have noted where we are working to capture and assess relevant information on our extended supply chains. We seek to use this information to continuously assess the saliency of risks, collaborate with our supply chain eco-system and adapt our actions to reduce the risks to people.

STP and WestConnex entities without supply chains

STP and WestConnex have a number of entities, including reporting entities, that do not engage with suppliers to purchase goods or services and do not have direct supply chain exposure to modern slavery risks.

Modern slavery risks

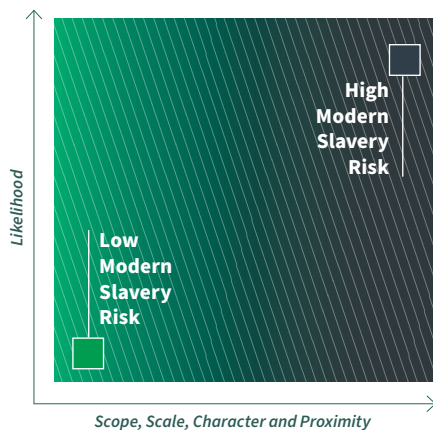
STP Group's investment in WestConnex and exposure to WestConnex's operations and supply chains represents the primary potential area of risk for STP Group.

STP Group's supply chain, comprising the administrative and professional services provided to STP Group by Transurban, are considered by STP Group to be a lower risk area given the skilled nature of the services, the jurisdiction in which they are provided (i.e. Australia) and the governance and risk management processes adopted by Transurban.

We seek to assess relevant risks in alignment with the 'continuum of involvement framework', described in the UN Guiding Principles on Business and Human Rights (UNGPs). Using this framework, we have assessed how we may cause, contribute, or be directly linked to potential or actual instances of modern slavery.

In considering the reporting of the modern slavery risks of STP Group, we have described below the more salient risks specific to the operating owned and controlled entities in WestConnex within this section.

Example of Sustainable Procurement Risk Heat Map matrix



Risk assessment methodology review

During FY22, through Transurban's Sustainable Procurement Program, we reviewed the risk assessment methodology and tools we have been using since 2019. This review included an assessment of the source information, as well as the methodology used to determine the allocation of risks. Along with continued monitoring of public media sources, academic reports, feedback via our whistleblower service and global legislative developments, which may have an impact on the changes in our risk landscape, we found that the sources of information used to input into our Sustainable Procurement Risk Heat Map continued to be the most accurate to support our assessment methodology.

Our risk assessment processes have been adapted from Transurban's Enterprise Risk Management framework and draw added insights from ISO 20400 Sustainable Procurement guidelines as well as the UN Guiding Principles on Business and Human Rights (UNGPs). The methodology of the Sustainable Procurement Risk Heat Map looks at the scope and scale of potential adverse human rights and modern slavery impacts (based on vulnerability of population) and the irremediable character of these impacts (severity). It also considers the proximity to WestConnex and Transurban, and whether we may cause, contribute, or be directly linked to adverse human rights impacts, and the likelihood of these occurring.

 [See the application of the Sustainable Procurement Risk Heat Map outlined in our FY21 Modern Slavery Statement](#)

The framework of involvement

The UNGPs describe three ways an enterprise may be involved in human rights abuses, which include modern slavery. This is known as the 'continuum of involvement', and outlines not only the ways in which an enterprise may be connected to human rights abuses, but also provides guidance and expectations on enterprises in how they should provide remedies for situations based on their involvement.

- An enterprise may cause modern slavery directly, for example, if it was to engage in forced labour directly in its operations
- An enterprise may contribute to modern slavery, for example, if the enterprise's actions, such as contract negotiations, influenced a supplier to use modern slavery practices to provide the required work, such as debt bondage.
- An enterprise may be directly linked to modern slavery if, for example, it unknowingly engages with a supplier who uses modern slavery practices in the goods or services it provides, which could include deceptive recruiting for labour or services.

Risk assessment outputs

Operations

Using the 'continuum of involvement framework', we have assessed that there is a low risk of us causing or contributing to modern slavery in our operations. This is due to various factors. First, our operations are based in Australia, which is considered to be a jurisdiction with a low risk of modern slavery. Second, most of WestConnex's operations are outsourced to subcontractors. Our employees which are employed directly are guided by internal policies, principles and practices which are applied across the Group. We also raise awareness and deploy training across our operations which provide knowledge of rights, freedoms and access to grievance channels.

WestConnex has policies and processes (see page 12) to help mitigate potential modern slavery risks relating to our broader operations, and we continue to monitor and measure compliance with these requirements. In addition, we engage with senior leaders in our Sustainable Procurement Business Leadership Group where we keep key personnel updated on the evolving risks of modern slavery and assess our actions in response to these risks (see page 12).

Our potential involvement in modern slavery risks to people in our operations principally relates to our two employment entities. These are the only entities within our structure that employ staff.

STP Group and WestConnex do not directly employ any part-time or casual employees, and do not have employees located outside of Australia. We have identified that more vulnerable groups exist across our employment sphere, which were the four direct employees for WestConnex who were visa holders.

All employees are free to engage in collective bargaining, can leave their employment without material restrictions, and have access to workplace training which raises awareness of their rights and responsibilities including Ethical Business Practices, Code of Conduct and Modern Slavery training. In addition, employees are trained on how to access whistleblowing services and grievance channels, (see 'Grievances and remedy' section on page 14).

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 of payroll.

Supply chain

We consider that our more inherent risks of involvement in modern slavery may occur through being directly linked to adverse impacts through our supplier relationships.

Therefore, our work to assess and address our modern slavery risks continues to prioritise the goods and services we procure through our supply chain relationships and activities.

Given the size and complexity of our supply chain, we engage with our Tier 1 suppliers as our primary avenue to collaborate on actions to assess and address modern slavery in our collective supply chains. Together with Transurban as our majority owner and our operational supplier, we continue to build our understanding of the activities that occur beyond Tier 1 and support our suppliers and industry partners to understand the modern slavery context in which they operate. In all of the identified categories, it is unlikely that STP Group and WestConnex would cause or contribute to these potential risks.

We could be directly linked to these modern slavery risks to people, through our supply chains, and these circumstances could be enabled to flourish through the direct actions of our suppliers on their supply chain actors, or more indirectly if we applied downward influence on suppliers which may in-turn drive negative impacts to vulnerable people.

Through the Sustainable Procurement Program led by Transurban, we continuously assess the risks of modern slavery occurring in our operations and supply chains. In FY22 no new risks were identified. The Sustainable Procurement Risk Heat Map continued to be the most relevant and accurate assessment of the salient risks to people, which are:

High-risk spend categories

Onsite cleaning services

Cleaning services are a high-risk category due to the industry's reliance on foreign migrants, visa holders, gigworkers and subcontracted labour, all groups who are vulnerable to modern slavery and human rights abuses such as debt bondage, forced labour and coercive and exploitative situations. The industry's historical operational practices are another contributing factor. In consultation with our contracted suppliers, we have sought to address these risks. However we remain vigilant; as this industry remains high-risk due to its labour sources and established operational practices.

Construction materials

Construction materials used in our major projects, or operations and maintenance have been prioritised due to the raw materials, and components used which may be assembled in, or originate from countries with increased vulnerabilities of people, and a higher prevalence of modern slavery. These include steel, pre-cast concrete, imported materials, electrical equipment, components and wiring which could be manufactured at a site engaging in forced labour or deceptive recruiting, or the raw materials used in components could be mined by children exploited in dangerous environments. These construction materials are used deeper in our supply chain, at Tier 2 and beyond.

Promotional items

Promotional items (the majority of which are imported) have been prioritised as research consistently identifies potential and actual instances of forced labour and modern slavery occurring in industries such as textiles, including during the harvesting of raw materials, processing and manufacturing of products. The items or raw materials used in the manufacturing process could be made using state-sanctioned forced labour, or other types of modern slavery deeper within the supply chains.

Our approach

The STP Group approach to mitigating and accounting for modern slavery risks, relies on the actions of WestConnex and Transurban.

STP Group monitors, and has oversight of, WestConnex in its capacity as owner of WestConnex, including through receiving and considering financial and risk reporting by WestConnex.

Governance

As part of our established governance protocol, WestConnex and STP Group (as defined in Appendix A) are overseen by Boards of Directors with direct responsibility for the relevant reporting entities.

The Transurban Procurement team is responsible for operational management of the Sustainable Procurement Program. During FY22, the STP Board and the Transurban Executive Committee (including the Group Executive of WestConnex, and STP Board members) received progress updates on the Program.

The processes and practices that WestConnex applies with respect to managing modern slavery risks in our workforce form part of our overarching risk management program and are subject to the oversight of the STP Boards and their Committees.

To continuously improve our actions to address modern slavery risks, we draw on internal and external human rights expertise to review our modern slavery statement drafts and the actions that support these statements. In FY22, we responded to expert recommendations to implement a more formalised governance group of business representatives, bringing together a broad range of key shared personnel across WestConnex and Transurban, to engage in leadership meetings every second month on issues including modern slavery risks. This group is tasked with overseeing the agreed roadmap of activities, and implementation of actions across the businesses to assess and address modern slavery risks.

Policies and procedures

We take a Group wide approach to mitigating modern slavery risk. The policies and procedures for managing modern slavery risk for STP are managed and implemented by WestConnex. These policies and procedures are aligned with those of the broader Transurban Group.

As noted in our **FY21 Modern Slavery Statement**, we have a suite of policies that form the foundations of how we manage the risks of modern slavery across our operations and in our supply chain. These 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 including all of our owned and controlled entities.

Our Code of Conduct and values articulate the behaviour expected of Directors, Senior Executives and employees. 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 should 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. These policies and procedures, including how they support our actions to address modern slavery risks, include:

- **Employee Code of Conduct**—requires employees to follow key principles including responsibilities on topics including bullying and harassment, equity and diversity, risk management, fraud and sustainability.
- **Sustainability Policy**—Our commitment to People, Planet, Places and Partnerships, including safety of people in our operations and supply chains, and support for the UN SDGs.
- **Supplier Sustainability Code of Practice (SSCoP)**—applies to all new and existing suppliers, outlines our minimum standards and leadership expectations (including labour and human rights), and encourages suppliers to go beyond legal compliance in order to advance their social and environmental responsibility. The SSCoP is required to be communicated to all subcontractors working on WestConnex projects.

- **Whistleblower Policy**—provides information on how WestConnex supports the raising of issues (including indicators of potential or actual cases of modern slavery).
- **Diversity and Inclusion Policy**—commits WestConnex to a harassment-free environment and promotes pay equality.
- **Ethical Business Practices Policy**—defines the standard required from employees and third parties when working with STP and Transurban and highlights processes for prevention, detection and the investigation of reports of fraudulent or corrupt conduct (including those related to modern slavery). Any material breaches are reported to the Transurban Audit and Risk Committee.
- **Procurement Policy (internal only)**—commits the company to advance alignment with ISO 20400:2017, and to include sustainability considerations in the sourcing process (including human rights). It defines the requirements of employees on the processes to adhere to in relation to procurement activities, including requirements for triage of high-risk categories identified, use of the risk heat map and processes of contracts and purchase orders. It also outlines how breaches to the policy will be dealt with.
- **Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines (internal only)**—provides information to Transurban and WestConnex employees on how to raise an issue relating to actual or potential modern slavery issues in our supply chain and outlines the process for an issue to be triaged, assessed, and what actions may be taken to provide remediation. More information can be found in section 'Grievances and remedy' section on page 14.
- **Human Rights Policy**—sets out how Transurban will fulfil our human rights commitments, preventing and addressing adverse human rights impacts. It identifies the salient human rights issues, responses to these issues, including modern slavery, as well as the guidelines for implementation of actions.
Employees, suppliers, STP Group and WestConnex entities are bound by these policies through agreed contractual controls or employment agreements.

We monitor these policies with internal systems, management processes and the ability to report issues through our whistleblowing service. We continue to regularly review and update these policies as required.

Supply chain due diligence

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 a holistic and consistent approach in assessing actual or potential modern slavery risks. We do this by tracking how we and our suppliers meet our policies and contractual requirements, integrating these findings, and continuously looking to improve our actions and processes.

Through this continuous process, we assess how STP Group, WestConnex and its operator, Transurban, may cause, contribute or be directly linked to potential or actual instances of modern slavery or adverse human rights impacts using the tools, actions and triage processes that we have available.

The tools used by WestConnex and Transurban include:

- **Supplier screening**—financial, director, and company ultimate benefit ownership checks are used to identify any known issues that may relate to labour concerns, illegal behaviour or indicators that may lead to adverse human rights impacts, including insolvency risks.
- **Sustainable Procurement Risk Heat Map**—available to employees to map the category of goods or service they are looking to purchase against the assessed risk level. This gives employees an opportunity in advance to seek internal advice to incorporate into contracts, or to investigate measures prior to engaging in work.
- **Tender Response Schedules**—used during larger procurement activities, usually over a certain threshold in contract value. These schedules, as noted in previous statements, require businesses to answer questions and provide evidence demonstrating the respondent meets our codes and policies, aligns with the UNGPs and how they mitigate the risks to people in their operations and extended supply chains.

- **Contractual controls**—provides binding obligations for suppliers to meet labour related and modern slavery clauses, including reporting potential or actual cases to Transurban and WestConnex, as well as attesting to passing on payments to contractors down the supply chain, helping to reduce the risk of labour related issues beyond Tier 1.
- **New supplier high-risk triage**—used when a new supplier is added to the system to determine if they are providing high-risk goods or services. This request is directly routed to the Sustainable Procurement Manager to investigate any high-risk procurement activity. This action may lead to desktop reviews or engagement with employees or suppliers for further information on the procurement activity and the controls in place. A supplier may not be onboarded if these controls are insufficient.
- **Credit card and purchase order reviews**—conducted at intervals throughout the year. Purchase orders and credit card spend for higher risk categories identified in our risk heat map are reviewed. These include spend with suppliers who have existing contracts, Master Services agreements or are on preferred panels. They are investigated in a similar manner to the high-risk triage noted above, through desktop reviews and internal and external engagement. This information is used to improve our assessment of suppliers and categories that we use and will be used to strengthen the requirements of suppliers to mitigate modern slavery risks.
- **Supplier evaluation**—this is a new addition to our suite of tools and is in the process of being fully implemented. During the reporting period, this tool was developed internally to capture information from the risk heat map, tender response schedules, publicly available information as well as information provided through our supplier engagement. This tool will be used to provide an ongoing assessment of suppliers and how they mitigate the risks of modern slavery in their operations and supply chains.

In FY22, we reviewed the questions in our Tender Response Schedules to understand their use, effectiveness and their relevance to all respondent categories. We also reviewed how we were capturing, evaluating, and monitoring these responses.

Through this review process, we updated questions to improve their alignment with core requirements and leading human rights guidance including the minimum requirements and leadership expectations in our SSCoP, other policies, the UNGPs, the expectations of the Act¹, and other key information that we deemed important to capture to evaluate a supplier and their extended supply chain. These updated Tender Response Schedules will be used in future tenders.

During the reporting period, we piloted a digital risk screening tool to review adverse media, sanctions, watchlists and ownership structures. We reviewed information in relation to 18 of our suppliers across major projects, construction, technology and professional services. There was no information discovered that increased the assessment of risks from our risk heat map.

To better integrate the use of information to assess and manage risks, the supplier evaluation houses information from tender responses and other self-assessment questionnaires, collected and combined with data from supplier consultations, desktop reviews, or other sources. The tool will enable STP Group to monitor and measure suppliers individually and across categories of spend, to highlight areas to improve controls in the supply chain. This evaluation will be used as a continuous monitoring tool to assess the dynamic risks of modern slavery in our supply chains and the due diligence actions taken against these risks.

¹ Commonwealth Modern Slavery Act 2018—Guidance for reporting entities

Grievances and remedy

We recognise the importance of providing access to remediation for affected individuals or groups in line with the UNGPs. 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. WestConnex will seek, where applicable, to exercise to the fullest extent 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.

WestConnex has internal and external avenues for employees, contractors and people within our supply chain to raise concerns regarding issues, including those relating to fraud, conflicts of interest, bribery, corruption, potential or actual instances of modern slavery or adverse human rights impacts. As described on page 18 of the **FY21 WestConnex Statement**, our independent external whistleblowing hotline service is available and can be accessed via a toll-free telephone number, online or by post. A report may be made anonymously, if desired, using any of these methods.

During the reporting period, we continued to expand our communications and awareness of this service, including to onsite cleaning contractors, as well as our supplier's TCROs and IRC teams as part of specific training focused on identifying human trafficking on our road networks.

Through the external whistleblowing hotline service available to all Transurban and WestConnex staff and suppliers, seven issues were raised during the reporting period. None of these reports related to potential or actual instances of modern slavery.

A less formal channel is also available to raise concerns where an employee can raise an issue via our online "Modern Slavery Query" request, which directs queries to our Sustainable Procurement Manager.

Remediation guidelines

During FY22, we reviewed and refined the Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines, which outline the appropriate steps that STP and Transurban would take if potential or actual instances of modern slavery are identified in our supply chain. We recognise that these issues can be complex and sensitive to navigate, and these guidelines are designed to prioritise the protection and support of identified victims. The guidelines are available on our intranet for all employees and are intended to be improved and developed as we continue to learn about effective remediation.

The changes made in FY22 include further detail in our descriptions of actions and aligning these with our Whistleblowing Policy. Information on escalation, including to the Australian Federal Police and National Contact Points were updated, and the scope was further clarified to include both potential and actual instances of human rights abuses or modern slavery. In addition, further details to the investigation process were added, and examples of remediation were more closely aligned to the continuum of involvement framework encouraged by the UNGPs.

Training and capacity building

Awareness raising, training and capacity building can better equip our employees and our supplier partners to understand how modern slavery may occur in our operations or supply chains, and how to identify and respond to modern slavery risks. Each year, all WestConnex employees complete mandatory online training across our policies and key issues. These include:

- **Ethical Business Practices**—which includes training on receiving and giving of gifts, including our gift register, training in relation to anti-bribery and corruption, discrimination and modern slavery
- **Code of Conduct**—employees are refreshed on the policy and their obligations, are asked to review the Code of Conduct and attest they have read and understood their obligations
- **Whistleblower policy**—which raises awareness on how to raise concerns internally or externally (including anonymously), including situations of potential or actual instances of modern slavery

- **Modern Slavery**—which educates employees on:
 - 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
 - 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 whistle-blower service)

Modern Slavery online learning includes an introduction from our executive team, a fact sheet for employees to download for quick reference and includes questions throughout the module to test knowledge retention and effectiveness.

Training deployment approach

These training modules are deployed annually for all eligible employees¹ to complete, accompanied by internal email and news communications, access to the policies on our intranet and public websites, and training modules are available for employees to access on-demand at any time throughout the year to refresh their knowledge.

In addition, during FY22, detailed training workshops on modern slavery, and key requirements under the Act were also held for all procurement employees and several key contract managers as part of our wider program.

Further, 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 a key aspect of any successful approach is to work closely with likeminded industry partners to avoid taking a fragmented approach to the market (see 'Multi-Stakeholder Engagement' on page 16).

¹ Eligible employees, including managed contractors at the time of deployment

Measuring effectiveness

We assess the effectiveness of our actions to address modern slavery and use feedback to refine our program.

Through STP's aligned approach with Transurban, we seek and receive feedback from both internal and external sources including employees, suppliers, investors, industry groups, external specialist consultants and NGOs. During FY22, we have continued to evolve and mature our processes to measure the impact

and effectiveness of our efforts using the following indicators. 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	Controls or action effectiveness	Indicators
Governance	Policies and guidelines related to human rights	Key documents reviewed and updated. These documents are managed through an internal control documents library and where required, are endorsed and approved at executive or board level
	External benchmarks	Results in public benchmarks, including Dow Jones Sustainability Index, Global Real Estate Sustainability Benchmark for Infrastructure, MSCI ESG rating, or public reports on modern slavery disclosures
	Internal audit on controls	Internal auditing of processes and controls relating to assessing and addressing modern slavery, and the completion of actions in response to audit findings
	Internal governance groups	Convening of bimonthly Sustainable Procurement Business Leadership Group meetings (two completed in FY22). Completion of action items originating from meetings. Qualitative feedback from these leadership meetings on improvements in actions and their effectiveness
	Sustainable Procurement Program KPIs	Meeting annual key performance indicators in relation to continuous improvement in assessing and addressing modern slavery risks
	Integration of modern slavery considerations into sourcing practices managed directly by the Procurement team	Mandatory supplier self-assessment questions including in relation to human rights including modern slavery used in all sourcing activity managed directly by the procurement team per annum
Risk Management	Risk assessment	Annual review of Sustainable Procurement Risk Heat Map, which includes modern slavery risk assessment methodology
	Risk register tracking	Actions taken against corporate risk register items regarding modern slavery
Monitoring	Issues raised through our grievance mechanisms	Accessibility and utilisation of mechanisms Number of issues investigated and remediated
	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
	Supplier and Business Partners survey for feedback on our actions which may impact suppliers and increase the risks of modern slavery occurring	Qualitative feedback to identify areas of focus where we can enhance actions.

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

Multi-stakeholder engagement

We continue to contribute to industry progress in tackling modern slavery, including engaging on policy, collaborating on activities and promoting awareness.

During FY22, our 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 FY22 included:

- **Australian Government's Modern Slavery Expert Advisory Group, which from 2022 is now led by the Attorney-General's Department**—The Transurban Sustainable Procurement Manager has been a member of this advisory group since 2020

- **UN Global Compact Network Australia (UNGCA)**—Transurban (including WestConnex) is a member of the UNGCA and an active participant in the Modern Slavery Community of Practice—Optimising Stream, where businesses committed to the 10 principles, deepen their knowledge across human rights and modern slavery, engage with experts, share insights and increase supportive networks on remediation
- **Participated (in-person and online) in numerous multi-stakeholder sessions to discuss human rights issues, including modern slavery** (the Domus 8.7 Index—benchmark of modern slavery statements webinar, and the International Justice Mission modern slavery roundtable 'Spot Fires in Supply Chains' discussion on the publication)
- **Panel member at the RIAA Australia 2022 Conference**—Human Rights Working Group discussion on Australia's modern slavery legislation and actions
- **Partnered with Anti-Slavery Australia to help develop and implement a pilot program to educate our TCROs and IRCs on identification and escalation of**

human trafficking—see page 20

- Engaged with like-minded industry members through the ISC Modern Slavery Coalition to collaborate and increase capabilities across the infrastructure construction and maintenance sector, including participating at a panel discussion session at the ISC Re:Connect Conference in Sydney in March 2022 titled 'Mitigating modern slavery risks'
 - **Shared key insights and experiences on assessing and addressing Modern Slavery risks** through a podcast interview, hosted by Apricot Consulting
 - **Joined the online panel discussion for the ACSI presentation of "Moving from paper to practice" report**, delivered to ASX200 companies in December 2021
- We continue to engage with industry to collectively act, share our knowledge where we can help others, and learn from peers and experts.

Collaborating for action

During FY22, the Infrastructure Sustainability Council's—Modern Slavery Coalition continued to focus on practical opportunities for collaborative action to address shared modern slavery risks in the infrastructure sector. The Coalition met regularly during this period and progressed a number of key actions. This included:

- **Draft supplier risk tool**—In early FY22, the Coalition prepared a template supplier risk tool, which aims to provide small suppliers with a practical tool for assessing modern slavery risks in their operations and supply chains and communicate with Coalition members. The tool includes guidance on geographic, sector and product risk factors. The Coalition is working to trial the tool with suppliers.

- **Supplier capacity building workshop**—In November 2021, the Coalition held an online modern slavery workshop for infrastructure sector suppliers to improve their understanding and communication of modern slavery risks. The workshop was attended by 42 participants from across the sector and included an overview of the draft supplier risk tool.
- **Delivered modern slavery webinar for infrastructure sector suppliers**—In September 2021, the Coalition hosted an online webinar for infrastructure sector suppliers to help build understanding of modern slavery risks across the sector
- **Awareness raising**—The Coalition sponsored a panel discussion at the March 2022 ISC Reconnect Conference about modern slavery. Panel members discussed key challenges to addressing modern slavery both internally within their organisations and the supply chain more broadly and opportunities for greater action.

'Collaboration is a key foundation for meaningful business action to prevent and address modern slavery. Through the Coalition, business peers are exploring opportunities for action in the infrastructure sector, through supplier engagement, capacity building and engagement with expert external, stakeholders.'

Alexander Coward, Senior Advisor Pillar Two, Independent Co-chair, IS Council

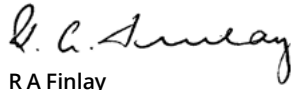
Approval

Consultation

Transurban owns 50% of STP and is the appointed operator of WestConnex. Transurban also provides general corporate services to the STP Group. The preparation of this Statement was led by the Transurban's Sustainable Procurement Manager, in accordance with a general corporate services arrangement with STP, following consultation with WestConnex's management. The Statement was also circulated to members of Transurban's executive team, in the context of its role as operator of WestConnex, prior to it being put to the Board of STP Group for final review and approval.

The entities comprising WestConnex have a common Procurement management team. During FY22, this procurement management team presented to the Boards on the status of relevant Procurement practices and the preparation of this Modern Slavery statement.

This joint statement was approved on 28 November, 2022, by each of the Board of Directors of STP AT Pty Ltd, as trustee of the STP Asset Trust, and STP PT Pty Ltd, as trustee of the STP Project Trust (together "STP Group") as the highest entities.



R A Finlay
STP Group Board Chair



Andrew Head
*Group Executive, WestConnex
Director, STP Group*

Appendix A

Reporting Entities

This Modern Slavery Statement has been prepared as a joint statement on behalf of the following reporting entities:

- STP AT Pty Ltd (ACN 626 630 144) as trustee of the STP Asset Trust; and
- STP PT Pty Ltd (ACN 626 630 153) as trustee of the STP Project Trust (together “STP Group”)
- WCX AHT Pty Ltd (ACN 625 890 708)
- WCX AT Pty Ltd (ACN 625 890 753)
- WCX PHT Pty Ltd (ACN 625 890 744)
- WCX PT Pty Ltd (ACN 625 890 799)
- WCX M4 PHT Pty Ltd (ACN 614 741 374)
- WCX M4 PMT Pty Ltd (ACN 626 329 342)
- WCX M4 PT Pty Ltd (ACN 614 741 436)
- WCX M4-M5 Link AHT Pty Limited (ACN 624 153 751)
- WCX M4-M5 Link AMT Pty Ltd (ACN 626 329 333)
- WCX M4-M5 Link AT Pty Ltd (ACN 624 153 742)
- WCX M5 PHT Pty Ltd (ACN 608 763 088)
- WCX M5 PMT Pty Ltd (ACN 626 329 477)
- WCX M5 PT Pty Ltd (ACN 608 798 465) (together, referred to as ‘WestConnex’)

Sydney Transport Partners and the Transurban Group

In September 2018, Sydney Transport Partners, an Australian-led consortium made up of Transurban, Canada Pension Plan Investment Board, Tawreed and Australian Super, reached financial close in a 51% stake of the WestConnex Group. During the reporting period, the remaining 49% was held by the NSW State Government through Roads Retained Interest Pty Ltd. On 20 September 2021, the NSW Government announced that Sydney Transport Partners was the successful bidder for the remaining 49% stake in WestConnex. References to ‘Transurban’ in this statement collectively refers to the Transurban Group.

Further details on WestConnex roads and projects managed by the reporting entities outlined above, together with all Transurban Group roads and projects, are covered in the Transurban FY22 Corporate Report.

Appendix B

Mandatory Reporting Criterion	Reference in this statement
Identify the reporting entity	Reporting entities under the Act—see page 3 Appendix A—see page 18
Describe the reporting entity's structure, operations and supply chains	About us—see page 5 Our operations—see page 6 Our people—see page 7 Our supply chain—see page 8
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	Modern slavery risks—see page 10
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	Our approach—see page 12 Multi-stakeholder engagement—see page 16 Measuring effectiveness—see page 15
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring effectiveness—see page 15
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	Consultation—see page 17 Approval—see page 17
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Our broader sustainability efforts—see page 3 Multi-stakeholder engagement—see page 16

