

Modern Slavery Statement 2023

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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 and present. As caretakers and custodians of transportation in urban communities we have a deep respect for First Nations 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 artwork and design elements in our infrastructure. To achieve our purpose – to strengthen communities through transport – we will continue to foster positive and sustainable relationships with all communities, while progressing our efforts to contribute to Australia’s reconciliation journey.

Reporting suite

Corporate Report¹


Transurban’s holistic performance for FY23, including its financial statements.

Modern Slavery Statement (this report)

FY23 overview of how we identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

Sustainability Data Pack

FY23 data sets for sustainability metrics, including GRI, SASB, and TCFD indices, and our progress against the UN SDGs.

 **More information can be found at [transurban.com](https://www.transurban.com)**

Reporting entities under the Act – This Modern Slavery Statement (Statement) is published in accordance with the Modern Slavery Act 2018 (Cth) (Act) and is filed as a joint statement, collectively for each of the ‘Reporting Entities’ (identified in Appendix A) forming part of the Sydney Transport Partners Group (‘STP’ or ‘STP Group’).

WestConnex (or ‘WestConnex Group’) is 100% owned owned by STP. This joint 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 (Program) was deployed to assist the WestConnex Group (owned and controlled by STP) with the management of its modern slavery risks. This Program is managed by the Transurban-led procurement team. As a result, there is a substantial amount of overlap with the Transurban Modern Slavery Statement.

Statistics and data presented in this statement will only include those businesses related to STP and WestConnex, unless otherwise stated.

Risk definition – Unless stated otherwise, all references to ‘risks’ within this Statement refer to modern slavery risks to people unless otherwise described. For more information on corporate and sustainability risks and responses across Transurban and WestConnex, see our [FY23 Corporate Report](#).

¹ Our sustainability reporting is integrated in the FY23 Corporate Report, including our climate change disclosure

FY23 in review

Modern slavery involves the exploitation of humans,¹ and continues to be present in all regions around the world, including Australia. On any given day, around 49.6 million people are in modern slavery according to current global estimates, which includes an estimated 41,000 people living in modern slavery in Australia. We recognise that we have a responsibility to respect human rights including freedom from all forms of abuse that make up modern slavery.

This Statement details the risks of modern slavery in our operations and supply chains and our approach and actions taken to assess, prevent and mitigate those risks.

We continue to work across our business and with our suppliers to improve our understanding and mitigation of modern slavery risks within our operations and supply chain.

During FY23, we progressed initiatives designed to enhance our understanding of – and responses to – modern slavery risks, including:

- reviewing our efforts to date to assess and address modern slavery risks
- adopting our majority owner and operator, Transurban's, modern slavery related policies to align our approach to modern slavery (see page 13)
- evaluating priority (high-risk category and high-spend) suppliers against Transurban-developed, tailored modern slavery response criteria (see page 15)
- increasing our modern slavery awareness, engagement and identification capabilities through targeted training (see page 16) and industry collaboration (see page 18)

- piloted a supply chain mapping study of bitumen (bitumen is an ingredient in asphalt, a key road-construction material) including, where possible, identifying suppliers and bitumen's component parts (such as crude oil) to increase visibility of the supply chain and potential risks within it (see page 8)
- partnered with suppliers to increase awareness of modern slavery risks and potential indicators, including training our supplier Incident Response Crews and Transurban's Traffic Control Room Officers (TCROs) (see page 16)

We also acknowledge that modern slavery could occur on our roads, and therefore, we included actions to help identify potential instances. We have provided specialty training to teams monitoring our roads to identify potential indicators of modern slavery and educated targeted suppliers in potential modern slavery risks and harms not just on our roads, but in the wider community.

In FY23, STP and WestConnex 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. 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 operated toll roads.

More than 99% of direct spend was with direct (Tier 1) suppliers² who are located in Australia

We partnered with our suppliers, training Traffic Control Room Officers, Incident Response Crews and support staff. Training provided personnel with skills to identify and escalate potential or actual instances of modern slavery or human trafficking occurring on our motorways

FY18

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

Commenced working with 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 focused on identifying and escalating potential or actual instances of modern slavery.

FY23

Embedded the use of a purpose-designed in-house supplier evaluation tool.

Piloted supply chain mapping study of bitumen to deepen our understanding of modern slavery risks.

Continued to expand training and build capacity in our operations and our supply chain.

¹ [What is modern slavery? | Walk Free](#)

² A Tier 1 supplier is a supplier directly contracted by WestConnex

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 toll roads in Sydney, New South Wales.

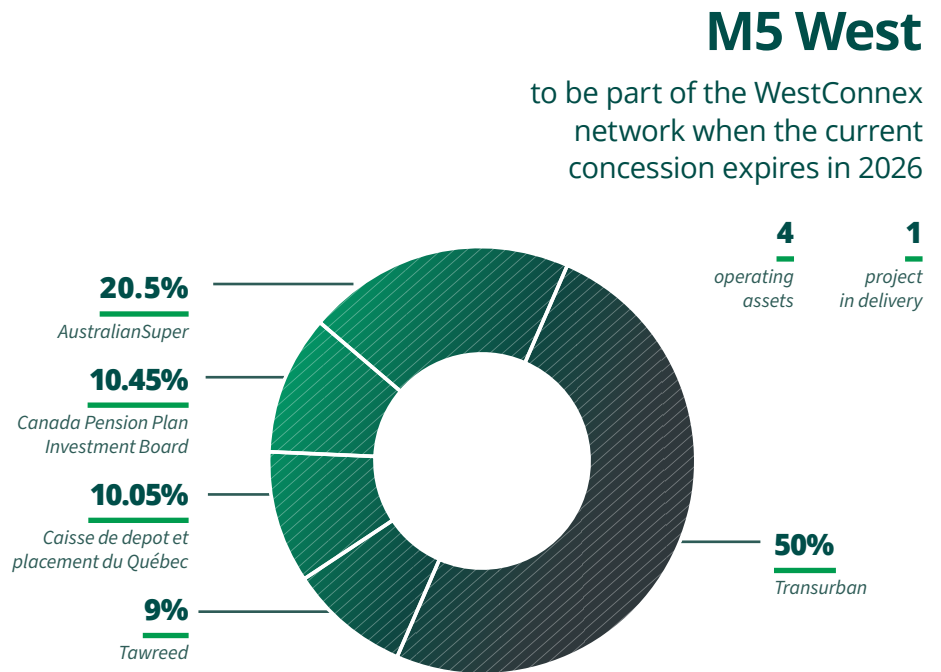
In 2018 Sydney Transport Partners (STP) acquired a 51% stake in WestConnex from the NSW Government. In October 2021, STP acquired the remaining 49% equity stake from the NSW Government taking STP's total ownership interest to 100%.

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

WestConnex

WestConnex is one of Australia's largest road infrastructure projects. The 33-kilometre, traffic-light-free motorway connects Sydney's west and southwest suburbs with the city centre. WestConnex also links Greater Sydney with major international gateways, including: Sydney Airport, Port Botany, and the future Western Harbour Tunnel and M6 Motorway. WestConnex is 100% owned by STP Group and is operated by Transurban.

Figure 2: The STP Investors comprise



M5 West

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

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.

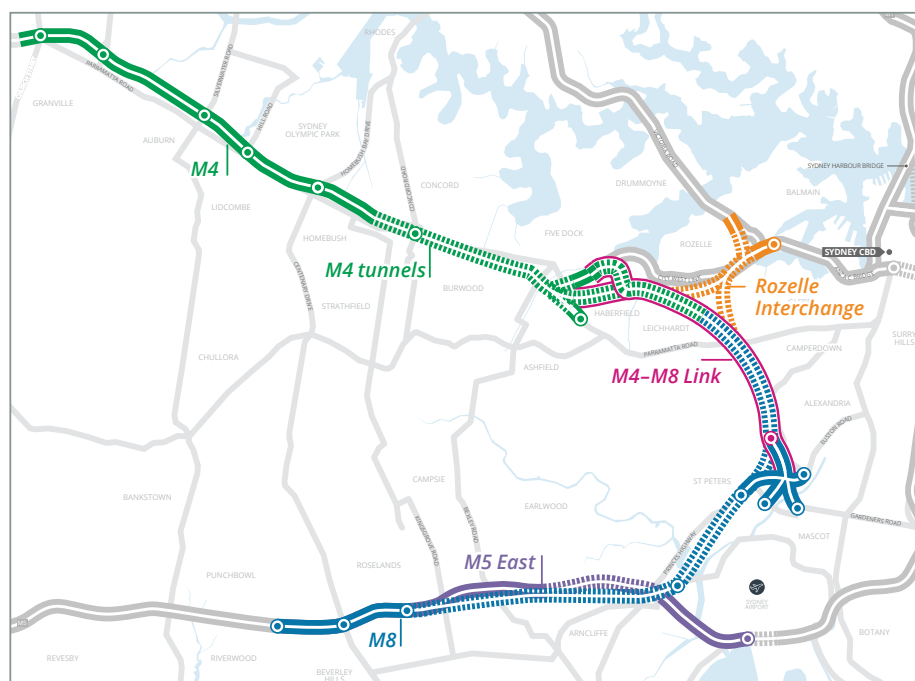
Transurban is lodging its own modern slavery statement for FY23 under the Act, which will be available at [transurban.com](https://www.transurban.com). The Transurban Modern Slavery Statement details the governance and risk management processes and policies that Transurban applies in relation to its 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 STP Group applies in relation to its own operations and supply chain, inclusive of WestConnex.



Vehicle exiting WestConnex

Our operations¹

STP's operations principally relate to the management of WestConnex, including collaborating with governments, business partners and suppliers to design, construct and operate WestConnex toll roads. As each road across WestConnex is completed and commissioned, Transurban (part owner of STP Group) is responsible for overseeing its operations.



WestConnex road	Ownership	Investment partner
M4	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
M5 East	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
M8	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed
M4-M8 Link	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed

Projects

Rozelle Interchange ³	50%	Transurban
	20.5%	AustralianSuper
	10.45%	CPP Investments
	10.05%	CDPQ
	9%	Tawreed

The WestConnex project has comprised four stages:

- M4 (opened in 2019)
- M8 (opened in 2020)
- M4-M8 Link (opened in 2023)
- Rozelle Interchange, delivered by the NSW Government (opening in late 2023)

The M4-M8 Link tunnels opened to traffic in January 2023. Operated by Transurban for WestConnex and STP, these tunnels are now helping motorists save up to 40 minutes in travel time, including avoiding up to 52 sets of traffic lights.²

More information on WestConnex is available at westconnex.com.au and in Transurban's FY23 Corporate Report.

Dedicated teams of TCROs monitor WestConnex roads 24/7, working closely with Incident Response Crews (IRCs) who respond to incidents to maintain safe and efficient operations and support impacted customers. WestConnex, Transurban and suppliers manage each road's maintenance and operations over the applicable concession periods.

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.

Customer experiences

Transurban's customers pay for toll road travel via the Linkt brand. Customers largely manage their Linkt toll accounts online or via mobile apps. The Linkt website and app provides information on toll pricing, trip costs and tolling points. In Sydney, customers can use the Linkt Trip Compare tool for information on travel-time savings, road incidents and Co2 emissions.

¹ In this Statement, "operations" refers to management of WestConnex undertaken by our direct workforce and Transurban. Suppliers and people engaged to provide support services that may interact with our operations (such as cleaning contractors and road maintenance) are included and referenced in our supply chain

² Customers can save up to 40 minutes on a peak period trip between Parramatta and Mascot. TomTom Data, average travel time saved per hour when using WestConnex eastbound and M4-M8 Link southbound (monthly average workday)

³ Rozelle Interchange is being delivered and funded by Transport for NSW with handover to WestConnex to operate upon completion

Our people

STP does not have employees, offices or operations itself. In FY23, WestConnex employed a small number of staff directly and shared a number of staff across the Transurban business tasked with managing the WestConnex operations and supply chains.

Our people work flexibly, primarily from WestConnex and Transurban offices and site locations, as well as remotely. Our people, including those shared across Transurban, are involved in activities such as: road operations and maintenance; major road project delivery; customer service; and head office functions (such as: customer and technology; legal; risk; health safety and environment; facilities; finance; procurement; corporate affairs; sustainability; and people and culture).

All WestConnex employees are employed in Australia and are covered by modern awards and individual employment contracts. All instruments meet or exceed the 10 minimum entitlements that must be provided to all Australian employees, as prescribed under National Employment Standards.

All WestConnex employees are free to raise concerns through internal escalation processes, or anonymously via the Whistleblower service. All employees have access to the Whistleblower service and receive training on how to lodge a complaint (see Grievances and Remedy section and Training section).



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 WestConnex service provider.

WestConnex supply chain

With four assets in operation and one project in delivery, WestConnex procures goods and services from a diverse range of suppliers, including large global multinational construction contractors, key technology providers, consultants and local and social enterprises.

Our supply chains are complex networks of large, medium and small businesses providing goods and services. Our procurement activities encompass much of the lifecycle of major road infrastructure, including design and construction and ongoing road operations and maintenance.

During the reporting period, the construction of the M4–M8 Link was completed and was opened to traffic in January 2023. The M4–M8 Link has been integrated into our overall network management systems and operations.




In FY23, in comparison to previous reporting periods, our business did not have any significant changes in the types of goods or services that we procured. Throughout the year, more than 180 direct suppliers were used to provide goods or services supporting the operations and maintenance of WestConnex.

Consistent with previous years, our top supplier categories for FY23, comprising more than 90% of our total spend were:

More than
\$290m
in annual managed spend

More than
180+
direct suppliers

More than
99%
spend with Australian suppliers

Category	Activity	Suppliers	Typical activities
Major project construction 	Design and Construction (D&C) of new or enhanced roads	Selected D&C suppliers Supplier subcontractors	Heavy works: drilling; piling; excavation; tunnel boring Mechanical and electrical: wiring; lighting; pumps; jet fans; installing deluge, ventilation and ITS Management: project and engineering Other: wire mesh; shotcrete, precast and in-situ concreting; asphalt laying; painting
Operations and maintenance 	Maintaining road safety and operating standards in line with mandated requirements	Selected incident response and maintenance suppliers Supplier subcontractors	Operations and maintenance activities are tailored to each road and include civil, mechanical and electrical works and incident response services. Suppliers may appoint subcontractors to deliver some activities. Road maintenance works may involve some of the construction activities listed under 'Major project construction' above.
Professional services and consulting 	Delivering services to corporate management	Selected consultants Legal services	Desktop-based specialist services including: legal support; strategy development; general business and financial consulting.

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



WestConnex M4-M8 link

More than 99% of our annual spend is with suppliers whose direct trading site or headquarters are located in Australia. We recognise that labour risks may be greater further upstream of the suppliers that we directly engage with, both in Australia and offshore. We are starting to assess these risks by mapping the supply chain of certain materials (see case study on page 8), identifying Tier 2¹ suppliers, as well as tracking potentially vulnerable groups used in the labour force.

Labour is a critical part of our supply chain. We used both direct and indirect labour to support us in operating and managing our assets, including being used in road maintenance services (such as landscaping, electrical and mechanical trades, incident response crews and machinery operators).

Some labour is provided by casual or migrant workers, with labour sometimes delivered in shifts, such as 24/7 incident response services. Further, road maintenance works are often delivered overnight to mitigate disruptions for road users.

For FY23 we began identifying and tracking migrant labour in our supply chains through the implementation of the Transurban supplier evaluation tool (see case study on page 16).

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 supplier relationships.

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. Further information on the governance of this Program is contained in the 'Our approach' section on page 12.

Extended supply chains beyond Tier 1

The level of knowledge we have about our extended supply chains (beyond our direct-contracted – Tier 1 – suppliers) varies. In some cases our Tier 1 suppliers are required, through our commercial arrangements, to disclose and report subcontractors, including the labour force used.

During the FY23 reporting period we began to capture more information about Tier 2 suppliers providing services to our major projects. This year we identified 91 Tier 2 suppliers. Using our internally developed supplier evaluation tool, we have begun to capture information including:

- the countries these suppliers are exposed to in their operations and supply chains
- the raw materials in their supply chains
- their modern slavery risks.

We will use this information to: continue ongoing assessment of the saliency of modern slavery risks that have been identified; collaborate across more of our supply chain ecosystem; and adapt our actions to reduce risk.

STP and WestConnex entities without supply chains

STP and WestConnex's structure include multiple entities (for example 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).

¹ Tier 2 suppliers are suppliers contracted to our Tier 1 suppliers, where STP or WestConnex does not have a direct contractual relationship

Case Study: Mapping the bitumen supply chain

During FY23, Infrastructure Sustainability Council’s Modern Slavery Coalition members (including WestConnex and Transurban) conducted a pilot bitumen supply chain mapping study. Bitumen is an oil-based derivative used to bind the asphalt used in road construction – including by coalition members.

The study was designed to gain, to the fullest extent possible, an overall picture of Australia’s bitumen supply chain, and to use this detailed information to confirm or reassess our current understanding of inherent modern slavery risks in the bitumen supply chain. It was delivered by the coalition’s Bitumen Working Group.

To begin, the group identified key global and domestic suppliers, including suppliers of raw materials used in bitumen manufacture. The group baselined current modern slavery risks and controls from available sources, including Modern Slavery Statements published on the Australian Government’s Modern Slavery Register, the Global Slavery Index (GSI) and the 2023 US Trafficking in Persons report.

Initial desktop research (including the modern slavery register) identified previously unknown organisations potentially involved in the bitumen supply chain. Engagement with identified suppliers followed. In some cases, this was challenging, with some suppliers having varying levels of appetite for study participation. Participating suppliers shared valuable insights and enabled more detailed mapping of the bitumen supply chain than previously understood. Further, the participants’ positive initial engagements had a cascading effect on transparency further upstream in the supply chain, with information shared driving more open communication.

Our research and engagement identified:

- four bitumen supply-chain levels (Tiers 1 to 4) generally located within Australia

- imported bitumen materials’ likely countries of origin, including differences depending on the bitumen manufacturing process (for example, offshore refining)
- other actors involved in the value chain, such as logistics companies, who do not own the supplied materials but are involved in their supply.

Mapping exercise outcomes

This pilot study enabled validation of some initial assumptions about the level of modern slavery risk in the bitumen supply chain. It also identified some changes in the inherent risk profile.

Prior to the mapping, existing information indicated a large percentage of refined petroleum products (including bitumen) imported into Australia, originated from Singapore, Malaysia and China. However, the group’s desktop and supply chain engagement did not identify China as a material source country for bitumen - a change from the original baseline.

Supplier engagement also led to new distinctions in the understanding of imported bitumen and raw bitumen materials:

- imported bitumen – a finished good manufactured in line with Australian standards was primarily imported from South East Asia, including from Singapore, Thailand and Korea
- imported raw materials (that is, oil derivatives) – imported into Australia for use in local bitumen processing facilities – were more likely to originate from Middle Eastern countries.

This refined the group’s understanding of bitumen’s geographic risk factors, depending on whether it was locally manufactured or imported. Assessing these country of origin learnings against the GSI risk data suggested that:

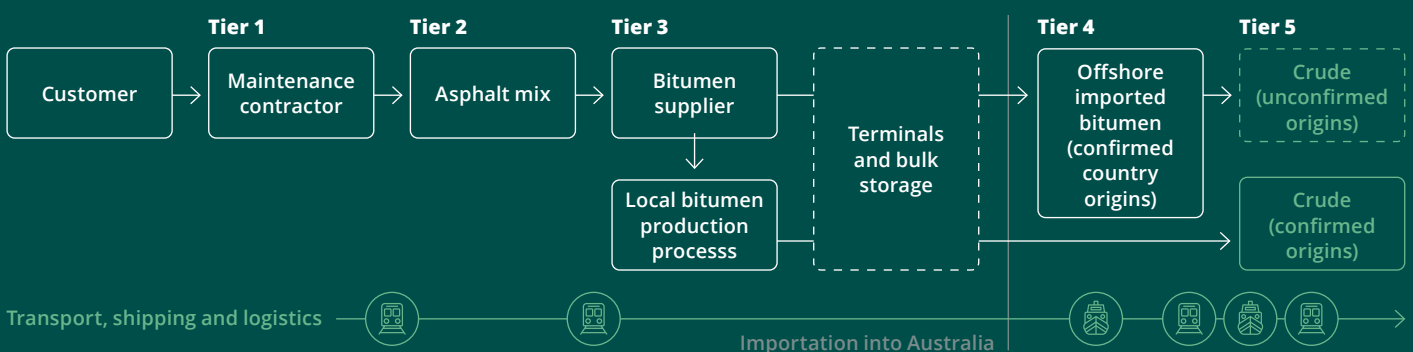
- bitumen refining had lower exposure to geographical risks when made in Australia (estimated 1.6 people in modern slavery per 1,000 people)
- imported bitumen carried higher geographical risks, with the potential for higher risks if the raw oil was extracted from middle-eastern countries such as Iraq (5.5 people in modern slavery per 1,000 people); Bahrain (6.7 people in modern slavery per 1,000 people) and Saudi Arabia (21.3 people in modern slavery per 1,000 people)
- geographical risks associated with imported bitumen from South Korea (3.5 people in modern slavery per 1000 people) and Thailand (5.7 people in modern slavery per 1000 people) were also considered.

The study found that:

- through research, engagement and proactive consultation we were able to trace key elements of the supply chain, with the potential to expand this work to gain a robust level of information on the movement of materials, conversion and application of bitumen
- there was some reluctance from some companies to engage on these initiatives, and research and relationships were critical in overcoming these barriers
- the flow of goods can vary depending on location and application, including different supply chain actors. For example, country of origin diverges depending on what is being imported – raw crude or finished bitumen, and this factor can alter the level of inherent modern slavery risks
- further work is needed to build the capacity of organisations in the supply chain to assess and manage risks to people, including modern slavery.

Modern Slavery could exist in supporting value chain actors, including in the shipping sector where seafarers could be vulnerable, as well as in other transport, logistics and material handling and storage services.

Figure 3: Bitumen supply chain



Modern slavery risks

As was the case in FY22, STP Group's investment in WestConnex and exposure to WestConnex's operations and supply chains continues to represent the primary potential area of modern slavery risk for STP Group.

STP Group's operations, comprising the administrative and professional services provided to STP Group by Transurban, are considered by STP Group to be a low risk of modern slavery given the skilled nature of the services, the jurisdiction where they are provided (i.e. Australia) and the governance and risk management processes adopted by STP Group, WestConnex and Transurban.

As in previous reporting periods, in FY23 we assessed relevant risks in line with the UN Guiding Principles on Business and Human Rights' (UNGP) continuum of involvement framework. Using this framework, we have assessed how we may cause, contribute, or be directly linked to potential or actual instances of modern slavery.

The UN Guiding Principles on Business and Human Rights (UNGPs)¹

The UNGPs establish a framework for businesses to guide the prevention of, and addressing involvement in, human rights harm – including modern slavery. Using the UNGPs as a guide, we assess modern slavery risk by considering how we may cause, contribute to or could be directly linked to modern slavery. Our risk identification and assessment processes are applicable across STP Group, including the entities we own or control.

Transurban's Sustainable Procurement Risk Heat Map (Map) is used to provide a macro view of WestConnex's procurement risk profile and is reviewed at least annually. The Map examines the scope and scale of potential modern slavery impacts (based on prevalence and vulnerability of population) and the irremediable character (severity) of these impacts. The Map also shows the proximity of these impacts, and whether we may cause, contribute, or be directly linked to these impacts, as well as the likelihood of these impacts occurring.

Data captured through procurement systems is limited to our activities connected to our Tier 1 suppliers. However, our approach also considers higher-risk activities that may exist deeper within in our supply chain (for example, risk associated with raw material extraction) when we attribute risks.

In FY23, the Map was updated to include information from the following sources:

- [2023 Trafficking in Persons Report – United States Department of State](#)
- [List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)
- [Global Slavery Index | Walk Free \(globalslaveryindex.org\)](#)

Continuum of involvement framework (an example)

	Cause	Contribute	Directly linked
Involvement	Directly engaging in forced labour in its operations.	Acting to influence (via contract negotiations, for example) a supplier using modern slavery practices (such as debt bondage) to supply required work.	Unknowingly engaging a supplier that uses modern slavery practices in providing its goods or services, including via deceptive recruiting.
Expected actions and remedies	<ul style="list-style-type: none"> • cease or prevent the situation • provide or cooperate in legitimate remediation. 	<ul style="list-style-type: none"> • cease or prevent its contribution • use its leverage to mitigate remaining impacts • provide or cooperate in remediation in line with involvement. 	<ul style="list-style-type: none"> • seek to prevent and mitigate the impact • use its leverage to play a role in remediation to the extent possible.

¹ [Guiding Principles for Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework | UN Global Compact](#)



St Peters Interchange, WestConnex, Sydney

Risk assessment outputs

Operations

As was the case in the previous reporting period, we have assessed there is a low risk to people of STP Group or WestConnex causing or contributing to modern slavery in our operations. Our assessment considers factors including:

- Our operations are situated in Australia which are considered to have a low risk of modern slavery.
- Our direct employees have formal contractual arrangements and are guided by internal policies, principles and practices.
- Our workforce participates in awareness and training programs (deployed across our operations) with content covering knowledge of rights, freedoms and access to grievance channels.
- The majority of WestConnex's operations are outsourced to suppliers, including Transurban.

WestConnex has policies and processes (see page 13) 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 across Transurban and WestConnex 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 Governance on page 12).

Our potential involvement in modern slavery risks to people in our operations principally relates a single entity within our structure that employs the small number of 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 established mechanisms to mitigate against causing modern slavery within our operations, including providing our people with clear employment contracts, and maintaining appropriate internal policies, procedures and practices.

All employees can leave their employment without material restrictions.

All employees receive mandatory workplace training on ethical business practices, anti-bribery and corruption, harassment, bullying, discrimination, whistleblowing services and grievance channels (see Grievances and remedy on page 15). Employees' understanding of these matters is assessed within mandatory training modules – completion of this training is included in employees' performance requirements.

Further, our policies and procedures (see page 13) are designed to prevent and mitigate potential modern slavery risks within our operations, and we monitor and

measure operational compliance with these.

Supply chain

STP Group's risks of modern slavery are more likely to occur in our supply chain, where our involvement could link us to negative impacts to people. For this reason, our risk management approach to modern slavery prioritises our supply chain relationships and activities.

During FY23, we continued to assess risks and engage with our suppliers directly, via Transurban as well as through industry engagement. Throughout FY23, we made collaborating with our Tier 1 suppliers a priority, working with them to assess and address modern slavery risks in our shared supply chains.

During the reporting period, we continued to deepen our understanding of the inherent modern slavery risks in our supply chain and assess the controls and actions that our highest risk and prioritised suppliers take to identify any potential or actual harm.

Priority risk categories

Our supply chain includes four priority risk categories:

- (1) Onsite cleaning services.
- (2) Construction materials.
- (3) Promotional items and Personal Protective Equipment (PPE).
- (4) Security services.

In all identified priority categories, our assessment indicates it is unlikely STP Group or WestConnex would cause or contribute to any potential or actual harm to people. However, we recognise that we could be directly linked to harm through our supply chains. We also recognise these harms could be enabled or exacerbated through any action or inaction from any actor in the supply chain, which could lead to negative impacts on vulnerable people. If these circumstances occurred, any linked involvement could potentially be elevated to 'contributing' to harm.

Together with Transurban as our majority owner and our operational supplier we continue – through supply chain mapping – to build our understanding of the activities that occur beyond Tier 1. This combined effort supports our suppliers and industry partners in improving their understanding of modern slavery risks and actions needed to mitigate these risks.

Through the Sustainable Procurement Program led by Transurban, we continuously assess the risks of modern slavery occurring in our operations and supply chains. In FY23 no new risks were identified. However, to continuously improve our efforts to assess and address modern slavery risks, we have included Security Services as one of our priority risk categories. Our refreshed risk assessment and descriptions of our priority risk categories is shown on page 11.



Priority risk category	Description of vulnerability, prevalence and the inherent types of modern slavery	FY23 risk responses
<p>Onsite cleaning services</p>	<p>Cleaning services are considered a high-risk category due to the industry's reliance on foreign migrants, visa holders, gig-workers and subcontracted labour. All these groups have increased vulnerabilities to modern slavery and human rights abuses such as debt bondage, forced labour and coercive and exploitative situations.</p> <p>The cleaning services industry's historical operational practices are another contributing factor. We have consulted with our contracted suppliers to address these risks. However, we remain vigilant due to the industry's ongoing high-risk status, including its labour sources and established operational practices.</p>	<ul style="list-style-type: none"> assessed suppliers against our supplier evaluation tool (see page 15) investigated cleaners' first languages (see page 15) provided tailored multi-lingual posters displayed in our offices' cleaning cupboards; added an easy-access QR code increased equitable access to our whistleblower service, including supporting additional, relevant languages (see page 15).
<p>Construction materials</p>	<p>Materials used in our major projects and in operations and maintenance include raw materials and components that may be assembled in, or originate from countries with increased vulnerabilities of people, and a higher prevalence of modern slavery.</p> <p>Construction materials such as steel, pre-cast concrete, imported materials, electrical equipment, components and wiring may be manufactured at sites engaging in forced labour or deceptive recruiting. The raw materials used in components could be mined by children exploited in dangerous environments.</p> <p>These construction materials are used deeper in our supply chain, at Tier 2 and beyond.</p>	<ul style="list-style-type: none"> piloted supply chain mapping of bitumen (see page 8), continuing engagement with industry to assess findings assessed suppliers against our supplier evaluation tool tracked Tier 2 suppliers through contractual reporting.
<p>Promotional items and PPE</p>	<p>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. Because of this, we consider promotional items as a high-risk category.</p> <p>These items are mostly imported, and items or raw materials used in the manufacturing process could be produced using state-sanctioned forced labour, or other types of modern slavery within the supply chain.</p>	<ul style="list-style-type: none"> assessed suppliers against our supplier evaluation tool developed promotional items and PPE framework, including increased due diligence with sharing of factory audit reports (see page 14).
<p>Security services</p>	<p>Security services have been prioritised due to this work's 24/7 nature, and its use of casual and on-demand and subcontracted workers. The security services industry has historically identified labour issues and employs migrant and visa holders who may be more vulnerable to exploitation.</p> <p>Security service workers could potentially be exposed to severe labour issues and modern slavery instances such as coercion, debt bondage, withholding of documents or threats. These may be more prevalent when security services are subcontracted.</p>	<ul style="list-style-type: none"> assessed suppliers against our supplier evaluation tool In FY23, added security services to our high-risk triage within our systems process.

Our approach

The STP Group's 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.

Our approach to managing modern slavery risk is largely the same as previous reporting periods. We endeavour to continuously improve our actions and believe we have enhanced certain aspects of our approach. For example, in FY23, we updated and adopted policies relating to modern slavery risks including our Human Rights Policy and Supplier Sustainability Code of Practice. We deployed a supplier evaluation tool, piloted with industry partners an exercise to map the supply chain of bitumen and expanded our specialised training with our suppliers.

Our approach includes established governance, due diligence, grievance and remedy procedures and processes. Our actions engage our workforce, suppliers and partners and the wider industry (for example, through: industry coalition participation; industry memberships and events; and Tier 1 and 2 supplier engagement) to build overall capacity in assessing and addressing modern slavery risks.

Governance

The STP Group Board has overall oversight of STP and WestConnex, including entities that are owned or controlled.

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 WestConnex Boards and their Committees.

The Transurban Procurement Team implements the Transurban Sustainable Procurement Program. This program determines the actions Transurban will take in assessing and addressing modern slavery risks.

The Transurban Sustainable Procurement Business Leadership Group oversees implementation of agreed actions that assess and address modern slavery risks, including those actions relating to the WestConnex operations. This group comprises senior leaders (including function heads and general managers) from across Transurban's operations including: procurement; sustainable procurement; sustainability; social licence; finance and business services; major projects; operations; health, safety and environment; belonging, wellbeing and engagement; compliance and privacy; legal; and customer and technology vendor services.

Policies and procedures

As noted in previous reporting periods, STP takes 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 and Transurban as operator of WestConnex. STP's policies and procedures are aligned with Transurban's. This includes WestConnex adopting relevant Transurban policies for consistency in addressing modern slavery risks. Driving consistent application of our policies and procedures and setting unified expectations and standards across our operations and supply chains is a key element in our approach to managing the risks of modern slavery.

Our suite of policies is the foundation of our modern slavery risk-management approach across our operations and in our supply chain. These policies and the standards applicable to our employees, contractors and suppliers, are set centrally by STP Group (and aligned to Transurban's policies) to create a common baseline for expectations and consistency across all of our owned and controlled entities.

Our employees, contractors, suppliers and entities are expected to comply with our policies and procedures, and this is reflected in employment agreements and contractual controls.

Policies and procedures are reviewed regularly, and material breaches of policy are reported to the relevant group Board for the business. Our policies include:



WestConnex's 33-kilometre road tunnel network was completed in 2023

Policy or procedure	Scope and description	Implementation
Employee Code of Conduct	Details employees' responsibilities on topics including bullying and harassment, equity and diversity, risk management, fraud and sustainability.	<ul style="list-style-type: none"> • available on our intranet and external corporate website • mandatory annual review for all employees, including their attestation.
Human Rights Policy	Describes how Transurban (including WestConnex) will fulfill its human rights commitments, including preventing and responding to adverse human rights impacts, including modern slavery and provides guidelines for actions on implementation.	<ul style="list-style-type: none"> • available on our intranet and external corporate website • internal contract manager training via the Contract Management Framework process.
Sustainability Policy	Describes our commitment to People, Planet, Places and Partnerships, including safety of people in our operations and supply chains, and support for the UN SDGs.	<ul style="list-style-type: none"> • available on our intranet and external corporate website.
Supplier Sustainability Code of Practice (SSCoP)	Outlines the minimum standards and leadership expectations (including labour and human rights) new and existing suppliers must meet and encourages suppliers to go beyond legal compliance in order to advance their social and environmental responsibility.	<ul style="list-style-type: none"> • available on our intranet and external corporate website • included in supplier contracts • internal contract manager training via the Contract Management Framework process • supplier performance tracked via evaluation tool.
Whistleblower Policy	<p>Explains how Transurban (including WestConnex) supports reporting of issues, including reporting indicators of potential or actual cases of modern slavery.</p> <p>Provides information to support trust and transparency in the mechanism and process of remediation.</p>	<ul style="list-style-type: none"> • available on our intranet and external corporate website • annual awareness and training of the whistleblower policy • internal promotion of the whistleblower service via electronic signage and posters • regular reporting to management and Audit and Risk Committee.
Anti-Bribery Corruption and Fraud Policy	<p>Outlines Transurban's approach in relation to the prevention, detection, deterrence and management of Bribery, Corruption and Fraud risks.</p> <p>Applies to employees, contingent workers, consultants and suppliers of goods or services to Transurban.</p>	<ul style="list-style-type: none"> • mandatory annual training for WestConnex and Transurban employees • gifts and benefits register • available on our intranet and external corporate website • accompanying procedure • regular reporting to management and Audit and Risk Committee.
Conflicts Management Policy	<p>Defines Transurban's approach to managing conflicts of interest, requiring the declaration of any potential or actual conflicts of interest and appropriate response strategies.</p> <p>Applies to employees, contractors, consultants or suppliers of goods or services to Transurban as operator of WestConnex.</p>	<ul style="list-style-type: none"> • mandatory annual training for WestConnex and Transurban employees • conflicts of interest register • available on our intranet and external corporate website • accompanying procedure • regular reporting to management and Audit and Risk Committee.
Procurement Policy	Commits Transurban (including WestConnex) to advance alignment with ISO 20400:2017, and to include sustainability considerations in the sourcing process (including human rights) and sets out procurement requirements, including the triage of high-risk categories, risk heat map use, contract and purchase order processes and policy breach measures.	<ul style="list-style-type: none"> • available on our intranet • policy is included in Contract Management Framework training • our legal chat bot provides automated guidance.
Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines	Details how employees can raise issues relating to actual or potential modern slavery in our supply chain. It outlines the triage and assessment process and explains what actions may be taken to provide remediation. More information can be found in the 'Grievances and remedy' section on page 15.	<ul style="list-style-type: none"> • available on our intranet • processes align with our Whistleblower Policy • covered in our internal modern slavery training.
Contract Management Framework	Provides employees with a standardised approach for managing and administering contracts and is designed to support employees in making responsible and sustainable goods and services purchases. It outlines the roles and accountabilities required over the contract management lifecycle, from initiation to contract close out.	<ul style="list-style-type: none"> • available on our intranet • mandatory requirement for strategic and collaborative contracts (high risk / high value) • reviewed annually • regular training sessions provided to contract managers on this framework.

Supply chain due diligence

As described in our previous Modern Slavery Statements, one way we assess and respond to modern slavery risks is through our due diligence processes. We track how we and our suppliers meet our policies and contractual requirements, we integrate our findings and we use the overall picture to identify opportunities for improving our actions and processes.

We have integrated our due diligence processes into our supply chain management – including the key controls, tools and processes used by WestConnex and Transurban throughout the sourcing lifecycle.

Throughout this lifecycle, 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 and use a suit of tools, actions and triage processes described below to identify and mitigate salient risks.

The tools used by WestConnex and Transurban are shown in the table on the right.

Sharing Tier 2 supplier audits

For this reporting period we focused our ongoing due diligence efforts on priority-risk categories, including Promotional Items and PPE suppliers. Through discussions the Transurban team had with key suppliers, an opportunity was identified to gain further knowledge to assess potential labour and modern slavery risks of suppliers further upstream in the supply chain through the sharing of supplier audits.

The aim of this collaborative action is to support Tier 1 suppliers to understand the labour and modern slavery risks upstream at the Tier 2 supplier level, address any corrective actions that are identified within audits to reduce the potential for modern slavery to occur and to use our leverage with Transurban to support any further training, actions or remediation that may be required

Shortly after this reporting period finished, initial SMETA 1.6.1 audits were shared to review.

Tool	Description	Use-case
Supplier screening	Financial, director, and company ultimate benefit ownership checks are conducted to identify any known issues such as labour concerns, illegal behaviour or other indicators that may lead to adverse human rights impacts, including insolvency risks.	<ul style="list-style-type: none"> Transurban's procurement operations team reviews new suppliers against sanctions lists Transurban's strategic procurement team conducts additional independent financial and risks checks as needed, prior to contract award.
Sustainable Procurement Risk Heat Map	Available to employees (available on our intranet) to map goods and service purchase categories against inherent modern slavery risk levels.	<ul style="list-style-type: none"> Employees can seek advice on contract inclusions or measures to take prior to engaging supplier High-risk categories inform further processes to triage, review and assess new and existing suppliers identified via this tool.
Tender response schedules	Used for major procurement activities above a specified contract value. Returnable schedules enable consistent due diligence and assessment across tender submissions. All proponents must provide evidence demonstrating their ability to meet our codes and policies. Schedule questions align with the UNGPs, including how suppliers mitigate risks to people in their operations and extended supply chains.	<ul style="list-style-type: none"> An evaluation team assesses respondents against agreed criteria based on each scope of engagement. Supplier evaluations assess tender response schedules and provide feedback that informs the awarding of tenders.
Contractual controls	Establishes binding obligations for suppliers on labour-related risks and modern slavery. This includes reporting potential or actual cases to us; and passing payments to contractors down the supply chain (to reduce labour-related risks beyond Tier 1).	<ul style="list-style-type: none"> Transurban's legal team includes a precedent clause working group that regularly reviews clauses. We also draw on external expertise to establish practical and best-practice contractual arrangements.
Supplier high-risk triage	Determines if new suppliers are providing high-risk goods or services, with high-risk procurement activities triaged to the Sustainable Procurement Manager for investigation.	<ul style="list-style-type: none"> Investigations may include desktop reviews or seeking further information on supplier controls from employees or suppliers. A supplier may not be onboarded if its controls are insufficient.
Credit card and purchase order reviews	Purchase orders and credit card spend for higher risk categories identified in our risk heat map are reviewed regularly each year. Reviews include spend with suppliers who have existing contracts, master services agreements and preferred panels.	<ul style="list-style-type: none"> Spend categories and supplier data reviewed. Any learnings inform process improvements in place to manage future transactions with specific suppliers or spend categories and to improve supplier requirements to better mitigate modern slavery risks.
Supplier evaluation tool	Assesses suppliers' key controls (policies and processes, including policies and procedures applicable to their supply chains) for managing modern slavery risks. The tool also captures more granular information that will lead to improved future assessments of risks, such as supplier transparency and supplier risk mitigation score assessments.	<ul style="list-style-type: none"> Transurban's procurement team uses this evaluation tool as an assessment methodology during tenders or to review a suppliers performance against our SSCoP The tool also serves as a guide and reference when we engage with suppliers on process enhancements and additional contractual requirements.

¹ Sedex Members Ethical Trade Audit which enables organisations to assess their sites and suppliers based on their standards of labour, health and safety, environment and business ethics

Implementing a due diligence evaluation tool

Transurban developed an internal tool to assess suppliers' controls and actions for mitigating risks to people in the supply chain. This tool has been adopted by Transurban for WestConnex.

The evaluation tool helps us track and measure the actions suppliers take to address key issues to mitigate modern slavery. The tool captures 65 data points, including: key policies; due diligence actions; and supply chain exposure to labour force and geographical areas. Supplier risk and compliance is measured using a Transparency Score (quantitative) assessing key issues, a Risk Management and Health Score (qualitative) and measuring a supplier's alignment to our SCoP minimum criteria.

These enhancements enable consistent, score-based tender evaluations, provide information for ongoing supplier engagement and allow us to track our suppliers' risk assessment and mitigation performance over time.

Using a risk-based approach, prioritising suppliers who supply high risk goods or services identified in this Statement, in FY23 we evaluated suppliers representing over 80% of STP Group's total supplier spend, which included:

- identifying and assessing the policy controls these suppliers had in place to prevent modern slavery from occurring
- identifying suppliers who have disclosed the use of labour hire or migrant workers in their business or supply chains
- identifying suppliers who are taking their own due diligence steps within their supply chains by using self-assessment questionnaires or audits to assess modern slavery risks further upstream
- identifying suppliers who had some form of established mechanism for raising concerns, including modern slavery issues, within their business or supply chains

The process also provided additional information on our suppliers' supply chains, including details on country exposure and raw material input risks, giving us a greater understanding of the potential modern slavery risks further upstream.

Grievances and remedy

Access to remedy is a core component of the UNGPs. As indicated in our Human Rights Policy, 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, taking a victim-centered approach. WestConnex will seek, where applicable, to exercise to the fullest extent possible any contractual or other legal rights available to it to address any adverse human rights impacts in which we may be involved, including in relation to any issues concerning modern slavery.

WestConnex provide both internal and external channels for employees, contractors and supply chain personnel to raise concerns regarding issues including potential or actual instances of modern slavery and adverse human rights impacts, as well as fraud, conflicts of interest, bribery and corruption. This includes an independent external whistleblower service, FairCall, that can be contacted via toll-free telephone, online or post. Reports to this service can be made anonymously.

In FY23, we continued to drive awareness of this whistleblower service, including to Transurban TCROs and supplier (Incident Response Crews) IRCs operating WestConnex (see case study on page 16) We also updated our methods for providing

this information to our onsite cleaning contractors. To improve both accessibility and user trust, Transurban designed posters in languages spoken by cleaners working at our sites and displayed these in cleaning cupboards. QR codes were added to the posters to provide quick access to the FairCall service.

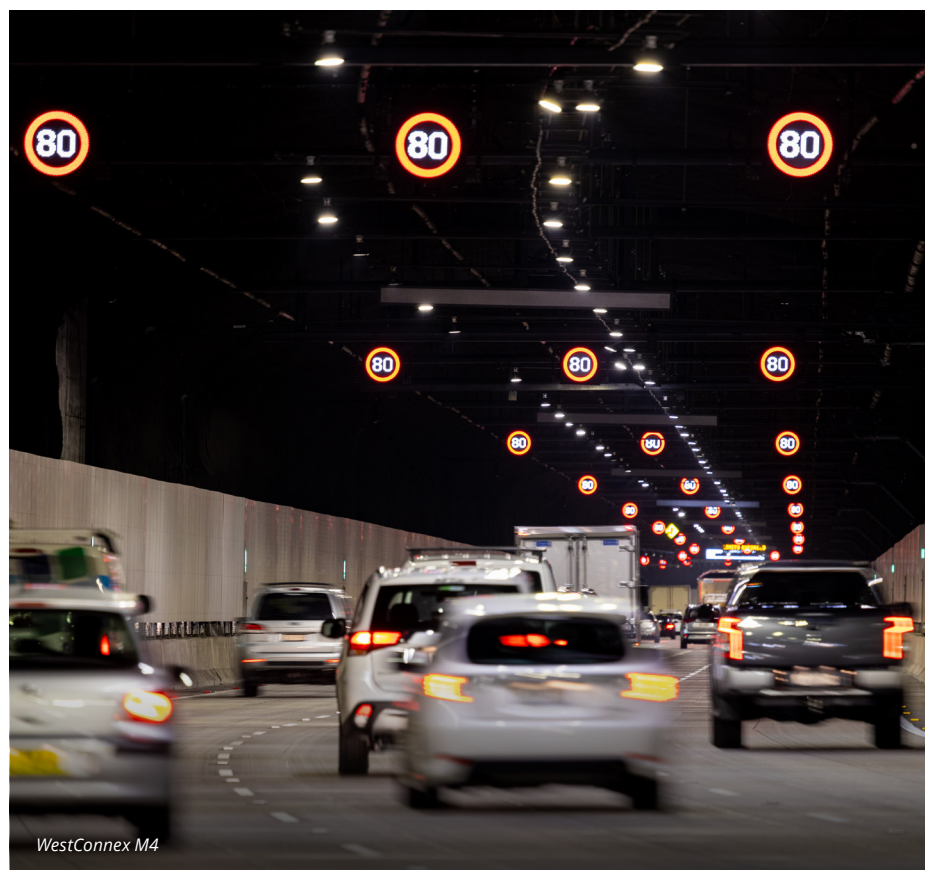
A less formal channel is also available to raise concerns where an employee can raise an issue via the online "Modern Slavery Query" request on the intranet,¹ which directs queries to the Transurban Sustainable Procurement Manager.

Remediation guidelines

Our Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines outline the steps we will take if potential or actual instances of modern slavery are identified in our supply chain. We recognise these issues can be complex and sensitive to navigate, so our guidelines are designed to prioritise the protection and support of identified victims. The guidelines are available on our intranet. We intend to improve and develop these further as we continue to learn about effective remediation.

Training and capacity building

Our awareness raising, training and capacity building occurs in partnership with



¹ WestConnex, Transurban and contingent managed workers have access to the intranet

Transurban, which aims to 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 are required to complete mandatory online training across our policies and our position on key issues. These include:

- **Ethical Business Practices and Privacy:** our expectations when receiving and giving gifts; our gift register; fraud, bribery and corruption; gifts and benefits; conflicts of interest; privacy; how these topics relate to potential modern slavery; Whistleblower Policy; available protections and support
- **Equal Opportunity and Anti-discrimination:** equal opportunity employment; workplace discrimination and harassment laws including state and federal laws; effects of workplace discrimination and harassment; what to do when faced with these behaviours in the workplace
- **Sexual Harassment:** workplace sexual harassment; and what to do if exposed to any form of sexual harassment in the workplace
- **Health, Safety and Environment (HSE) Contractor Management:** our "Active Client" contractor management approach; how to implement contractor management assurance; employees' HSE role within our contract management framework
- **Code of Conduct:** our mandatory behavioural standards and obligations
- **Whistleblower Policy:** processes for raising concerns (including anonymously) including for situations of potential or actual instances of modern slavery
- **Modern Slavery:** modern slavery risks; survivor stories; extended supply chain risks; policies; indicators; where to go to raise concerns or for help.

The above training modules are deployed annually and are supported by internal communications, intranet content (including relevant policy downloads) and public websites. All training modules are accessible as on-demand content as needed.

Additional operational training occurs across WestConnex and Transurban, where subject matter experts conduct sessions with targeted team members to deliver learning outcomes on key topics. This includes training on modern slavery and labour related risks as part of contract owner training through our Contract Management Framework. Contract owners learn about contract requirements relating to modern slavery, and how to develop sustainability plans with suppliers which can include actions to assess and address modern slavery risks.



Case study: Collaborating on supplier capacity building

We understand that in taking action on addressing modern slavery we must engage and collaborate with our suppliers to share our knowledge and encourage them to take action further in their business and supply chains.

During discussions with WestConnex's key incident response and maintenance contractor, we identified an opportunity to increase this team's skills in identifying and addressing modern slavery. The supplier is a joint venture and they did not meet the revenue threshold to report under the Act. We supported by delivering training to relevant personnel across WestConnex, Transurban and the supplier (including TCROs, supplier incident response crew members, management and operations staff). Training was delivered as an interactive Toolbox Talk at a maintenance site, with more than 50 people participating. Training content covered:

- modern slavery types and global and national statistics
- the decent work spectrum and where modern slavery exists on this spectrum
- industries where modern slavery can occur, illustrated with examples
- actual modern slavery examples, both in Australia and in NSW

- indicators of potential modern slavery and detecting instances: in working on our roads; responding to incidents; dealing with suppliers; in local communities
- actions to take when raising concerns about actual or potential modern slavery.

The session was also recorded and made available to operations and maintenance contractor employees, and Transurban and WestConnex employees. We will continue educating suppliers, raising industry awareness and increasing capability in identifying potential or actual instances of modern slavery and in knowing how to access and use our provided grievance channels. We strive to raise awareness across our industry to increase the identification of potential or actual instances of modern slavery, and for our team members and suppliers to be able to know how to respond to suspected cases by raising concerns through trusted and effective channels.



Measuring effectiveness

We continue to 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. Although the measures for effectiveness remain largely the same as the previous reporting period, during FY23, we have continued to evolve and mature our processes to measure the impact and effectiveness of our efforts using the indicators shown. In FY23 we focused on how we assess suppliers using the Transurban developed evaluation tool (see page 15) and expanding our collaboration with suppliers to build capacity to identify situations on modern slavery on our roads and supply chains, including how to raise concerns (see page 15).

Workstream	Controls or action	Effectiveness Indicators
Governance	Policies and guidelines	Regular reviews of policies and guidelines relating to modern slavery
	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. 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 across Transurban and WestConnex operations and supply chains
	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 sourcing activities managed directly by the Transurban procurement team
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
	Annual employee <i>Our Voice</i> survey	Gathers feedback on confidence in leadership, customer focus, sustainability and social license, diversity and inclusion, work environment and more
	Supplier and Business Partners survey	Qualitative feedback to identify areas of focus where we can enhance actions to collaborate with suppliers on mitigating modern slavery risks

Collaboration and industry engagement

We continue to contribute to industry progress in tackling modern slavery, including engaging on policy, collaborating on activities¹ and promoting awareness.

As was the case in the previous reporting period, during FY23 we participated in forums with Transurban, suppliers and other industry leaders to share learnings and knowledge on mitigating the risk of modern slavery.

- In FY23, this included: **UN Global Compact Network Australia (UN GCNA)** – Transurban (including WestConnex) is a member of the UN GCNA and an active participant in the Modern Slavery Community of Practice – Optimising Stream. Our involvement includes committing to the 10 principles, building our human rights and modern slavery knowledge, engaging with experts, sharing insights and increasing supportive remediation networks.
- Attending the **Australian Government’s Modern Slavery Conference**, including presenting on Responsible Sourcing as part of a panel discussion, engaging

and learning from multi-stakeholder representatives including from civil society, government, business and listening to the stories of survivors of modern slavery.

- Presenting at the **UN GCNA’s 2022 Australian Dialogue on Business and Human Rights** (as a panellist), and learning from human rights experts and peers on current and emerging issues
- Joining a roundtable with the **UN Special Rapporteur on Contemporary Forms of Slavery**, Prof. Tomoya Obokata to discuss challenges and opportunities in combating slavery within businesses operations and supply chains.
- Co-Chairing the **Infrastructure Sustainability Council’s Modern Slavery Coalition** (see breakout box on right).

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

The Infrastructure Sustainability Council’s Modern Slavery Coalition (of which WestConnex is involved through Transurban) is now in its fourth year. In FY23, the coalition continued to focus on practical opportunities for collaborative action to address shared modern slavery risks in the infrastructure sector, including through:

- **Scenario based training:** designed to build capabilities in responding to a claim of modern slavery in a participant’s supply chain and covered risk, legal and communication.
- **Impact note:** aligned Modern Slavery actions with the Infrastructure Sustainability Council’s IS-Rating scheme.
- **Expert presenters:** shared their experience, activity and examples of activity with coalition members. Presenters included James Cockayne (NSW Anti-Slavery Commissioner) and Prof John McMillan (Modern Slavery Act Review).
- **Capability session:** increased supplier awareness, understanding and capability in addressing modern slavery ahead of a potential lower modern slavery reporting requirements threshold.
- **Coalition workshop:** shared insights on challenges and opportunities encountered in developing modern slavery statements and reporting and explored government support and reporting improvement opportunities.
- **Modern Slavery Act review submission:** used learnings from capability session, coalition workshop and other engagement to develop a submission for the Modern Slavery Act review.
- **Knowledge Hub:** developed a knowledge hub directory of useful resources for members, with plans to expand access to the wider industry.
- **Supplier risk tool:** developed and published a Supplier Risk Tool tailored to smaller and diverse suppliers.
- **Supply chain mapping:** mapped the supply chain of a key material (bitumen) to inform the creation of a framework template (see case study on page 8).



WestConnex M4-M8 link

¹ All external engagement initiatives are conducted in accordance with applicable laws, including the Competition and Consumer Act 2010 (Cth)

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 Transurban's Sustainable Procurement Manager, in accordance with a general corporate services arrangement with STP, following consultation with WestConnex's management.

WestConnex operates using overarching policies, systems and approaches that are designed to be consistently applied across each of the entities comprising WestConnex and STP, including the entities which are owned or controlled. These processes are aligned to Transurban's as noted in this statement. STP have communicated with relevant entities (including those owned or controlled) 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 Sustainable Procurement Business Leadership Group for modern slavery risk management, which includes representatives from across a broad range of functions who have responsibilities across the reporting entities covered by this Statement and their owned or controlled entities (including Major Projects, Operations, Sustainability, Social Licence, Finance, People and Culture, HSE, Procurement, Risk and Legal).

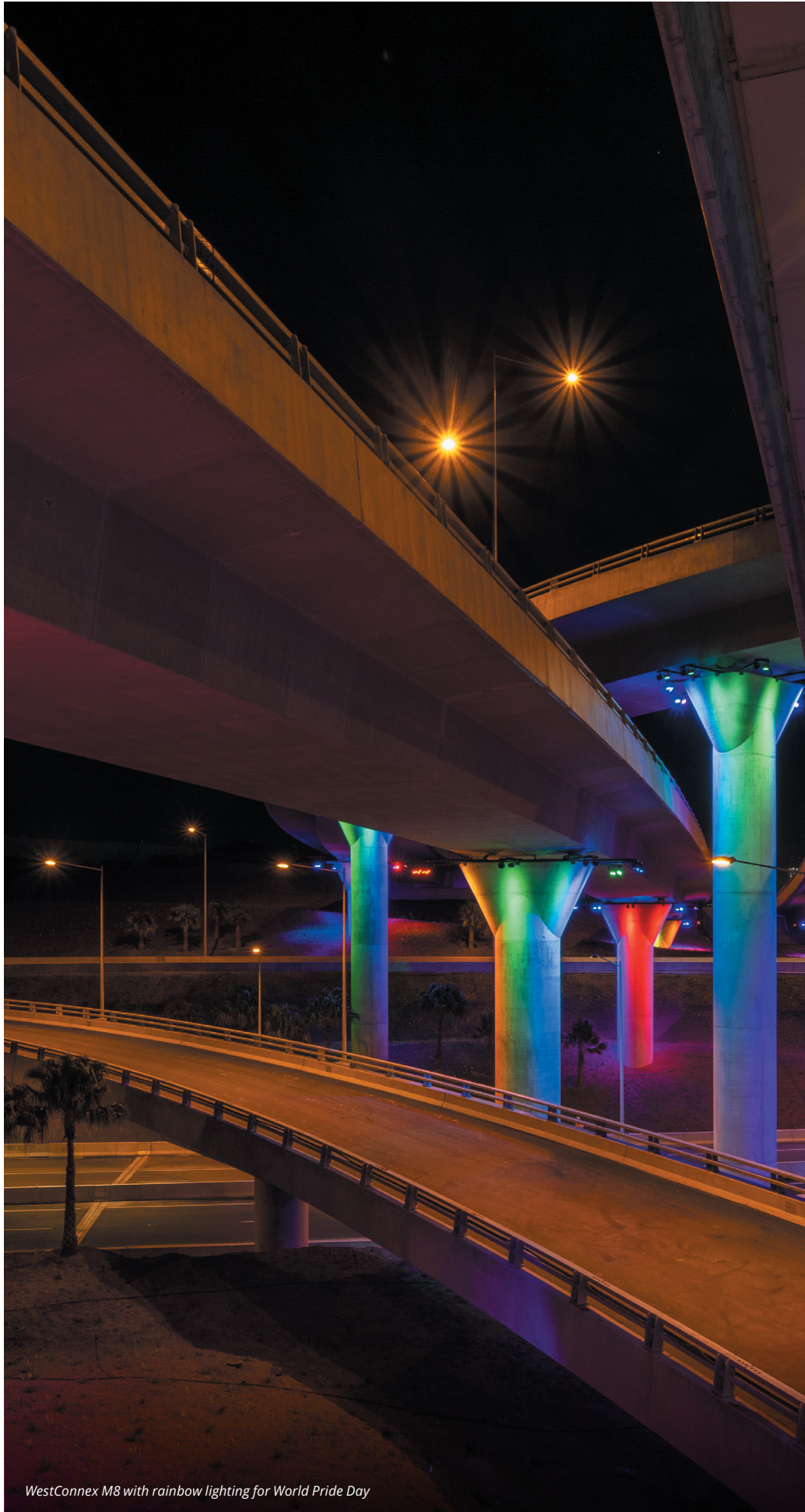
This Modern Slavery Statement has also been reviewed by the executive representatives, prior to being put to the relevant group Boards of Directors for review and final approval.

This joint Modern Slavery Statement was approved by each of the Board of Directors (as the 'higher entity' for the reporting entities within the meaning of the Act):

- STP AT Pty Ltd, as trustee of the STP Asset Trust on 21 November, 2023.
- STP PT Pty Ltd, as trustee of the STP Project Trust on 21 November, 2023.



R A Finlay
STP Group Board Chair



WestConnex M8 with rainbow lighting for World Pride Day



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; and
- WCX State Works Contractor Pty Limited ACN 624 154 089 (together, referred to as ‘WestConnex’)

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 [FY23 Corporate Report](#).

Appendix B

Mandatory reporting criteria

Reference in this statement

Identify the reporting entity	<ul style="list-style-type: none"> • Contents – see page 1 • Appendix A – see this page
Describe the reporting entity’s structure, operations and supply chains	<ul style="list-style-type: none"> • About us – see page 3 • Our operations – see page 4 • Our people - see page 5 • Our supply chain – see page 6
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"> • Modern slavery risks – see page 9
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"> • Our approach – see page 12 • Collaboration and industry engagement – see page 18 • Supply chain due diligence – see page 14 • Grievance and remedy – see page 15 • Case Study – see page 8
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"> • Due diligence evaluation tool - see page 15 • Training - see page 16 • Case Study - see page 16 • Measuring effectiveness – see page 17
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"> • Consultation – see page 19 • Approval – see page 19 • Governance – see page 12
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"> • Collaboration and industry engagement – see page 18

