

# 2024

## Modern Slavery Statement

# Modern Slavery

Modern slavery is a global issue affecting an estimated 50 million victims worldwide<sup>1</sup>. No country or supply chain is immune, and vigilance is essential to prevent human rights infringements.

At Ventia we firmly believe that any form of modern slavery is unacceptable. Our business spans Australia and New Zealand, encompassing the operation, maintenance and management of critical public and private assets and infrastructure. We work with a range of customers across sectors and supply chains and recognise the risk of modern slavery is present in the regions where we operate and from where we procure goods and services to support our diverse operations.

Our 2024 Modern Slavery Statement (Statement) outlines our approach to mitigating modern slavery risks in our operations and supply chains and the measures we have taken throughout 2024. It also details our efforts to inform our employees, subcontractors and suppliers on how to identify and respond to potential signs of modern slavery. This Statement demonstrates our evidence-based approach, to managing modern slavery risk and our commitment to work with our customers, partners and stakeholders to mitigate this.

The welfare of people within our business and throughout our supply chains is central to our approach. We are committed to ongoing diligence and review to identify risks, address issues where remediation is needed, and continuously improve our practices.



**Dean Banks**

Managing Director and  
Group Chief Executive Officer

1. <https://www.walkfree.org/global-slavery-index/>



## Acknowledgement of Country

Ventia would like to respectfully acknowledge the Traditional Custodians of country throughout Australia and their connection to land, sea and community. We pay our respect to them, their cultures and to their Elders past and present.



## Mihi

He tautoko te ahurea i ngā kawa me ngā tikanga o ngā Iwi whānui o Aotearoa, me ka kawa me ka tikaka o ka Iwi whānui o Te Waipounamu. We recognise and celebrate the culture of manawhenua in Aotearoa and Te Waipounamu where our teams respect local Iwi and communities across the country.

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## Introduction

Ventia Services Group Limited ABN 53 603 253 541 (**Ventia**) is an Australian public company listed on the Australian Securities Exchange (ASX) and the New Zealand Exchange (NZX) (as a foreign exempt issuer) with its registered office located at Level 8, 80 Pacific Highway, North Sydney, NSW 2060.

This Modern Slavery Statement (**the Statement**) has been made pursuant to the Australian Modern Slavery Act 2018 (Cth) (**the Act**). As an important part of this Statement, Ventia reports on its actions to identify and address modern slavery risks associated with its operations and supply chains during the year ended 31 December 2024.

This is Ventia's fifth Statement under the Act. It was approved by the Ventia Board of Directors (**the Board**) as the ultimate parent entity of the Ventia Group (**the Group**) on 5 June 2025.

### Reporting entities

This is a joint Statement, which applies to all Ventia reporting entities within the scope of the Act, as identified in Appendix 1 (collectively referred to in the Statement as **Ventia, we/our**).

### About Ventia

We are an infrastructure services provider operating in Australia and New Zealand, specialising in the long-term operation, maintenance and management of critical public and private assets and infrastructure.

Our purpose is to make infrastructure work for our communities. Our values of collaboration, integrity, challenge and ingenuity guide how we work.

## Our operations

Ventia's operations and workforce are structured across four sectors: Defence and Social Infrastructure, Infrastructure Services, Telecommunications and Transport; each comprising several business units, largely aligned with the industry segments we serve. Each Ventia sector is supported by Group functions, including but not limited to Digital Services, Finance, Supply Chain, Legal, People and Capability, Safety Health Environment Quality (SHEQ), and Strategy and Corporate Affairs.



### Defence and Social Infrastructure

Defence / Social Infrastructure /  
Critical Infrastructure / Local Government /  
Housing and Community / Energy Solutions



### Telecommunications

Fixed Networks / Wireless and Special  
Coverage Solutions / Operations and Services /  
Telecommunications New Zealand



### Infrastructure Services

Resources / Industrial and Environmental Services /  
Energy, Water and Renewables /  
Rig and Well Services



### Transport

Transport Operations Australia /  
Transport Operations New Zealand /  
Transport Infrastructure Solutions

## Our people



# 35,000

Workforce of employees and subcontractors

# 400+

Project sites throughout Australia and New Zealand

# 40%+

of our people work in regional and rural areas



Ventia's total workforce as of 31 December 2024 comprised 15,645 full-time, part-time and casual employees, with 14% employed in New Zealand and the remainder in Australia. 91% of our employees live locally to their workplace<sup>1</sup>.

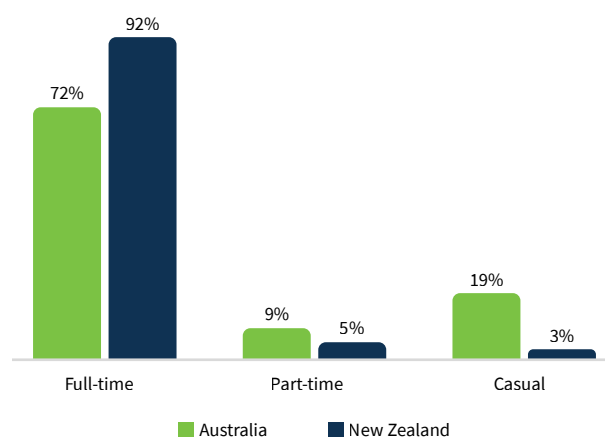
Our teams operate across more than 400 project sites throughout Australia and New Zealand, and 40% of our people work in rural and regional areas. In 2024 we hired more than 4,700 new employees and engaged over 20,000 subcontractors.

### Employee relations

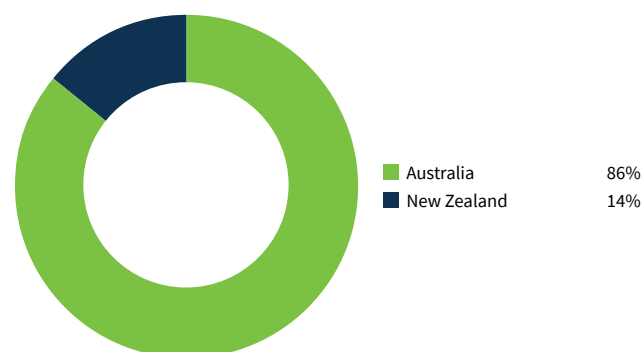
Our employees are covered by industrial instruments, including Modern Awards, Enterprise Agreements, Collective Employment Agreements, and Individual Employment Agreements. This reflects the composition of our workforce from school leavers and apprentices to highly skilled professionals.

At Ventia, we promote our employees' freedom of association and the right to collective bargaining. We demonstrate this commitment through constructive engagement with unions, negotiating and managing over 90 industrial instruments across the business in 2024. This process is supported by a centralised industrial relations team that provides guidance and ensures a consistent approach. Additionally, employee bargaining representatives are supported where unions may be absent.

### Ventia workforce by employee group (2024)



### Ventia workforce by country (2024)



1. Local defined as within a one-hour commute or 75km from their primary workplace.

## Corporate governance

Our approach to governance is based on our values and our strategy, which represent what we stand for every day.

Our values guide us to do what's right and act on what's important to our customers, employees and the communities in which we operate. Our strategy to Redefine Service Excellence focuses our activities to deliver on three strategic priorities (being customer-focused, innovative and sustainable). The Board is responsible for corporate governance at Ventia and its controlled entities (the Group) and actively demonstrates behaviours that are aligned with Ventia's values.

The Board is governed by a Constitution and Board Charter, which sets out the Board's authority, responsibilities, membership criteria and the agreed principles by which it operates. These documents, together with Committee Charters and a Delegation of Authority Matrix (DoA), establish the relationship between the Board and management.

Our governance framework plays an integral role in ensuring effective and responsible decision making at Ventia and enables our people to deliver on our strategy and commitments.

Our Board Safety & Sustainability Committee (SASC) oversees the management of workplace safety, health, environment, sustainability matters and risks, including modern slavery. The SASC meets quarterly and its Charter was reviewed and updated in December 2024 to reflect best practice and stakeholder expectations.

For more information about Ventia's corporate governance framework, practices and policies please refer to the [2024 Corporate Governance Statement](#).



**Pictured:** Women's Networking Event in New Zealand for Ventia's employees, Auckland North Island NZ



## Policy framework

Underpinning our Corporate Governance Framework are Ventia's policies and standards, several of which are relevant to managing modern slavery risk. These include our Code of Conduct, Modern Slavery Policy and Whistleblower Protection Policy, as summarised below.

### Ventia's Code of Conduct

Ventia's Code of Conduct (the Code) sets a clear and consistent standard of behaviour that is expected from all our people, including employees across the Group, those working in our joint ventures, and our contractors and suppliers. The Code defines our commitment to good corporate governance and responsible business practice. It provides a single reference point to ensure we work safely, behave ethically, and abide by laws and regulations with every work decision, task and interaction.

The Code outlines the process of raising concerns about behaviours that are contrary to the Code. Our people and any third party can also contact our independent whistleblower line, the details of which can be found in the Ventia Whistleblower Protection Policy and on our website at [www.ventia.com](http://www.ventia.com). Alternatively, contact can be made through our internal whistleblower email address.

The Board reviews the Code periodically to ensure it continues to address any emerging conduct or legal and compliance issues. The Audit, Risk and Compliance Committee is informed of any material breaches of the Code.

### Employee training on the Code

Modern Slavery training is embedded in our Code of Conduct training, which is mandatory during employee induction. It is required annual training for Ventia's directors, leaders and employees, and 99.3% of our permanent, full-time employees completed Code of Conduct training in 2024.

### Third-party compliance with the Code

Ventia's standard contracts for suppliers and subcontractors (including for labour hire companies) stipulate our requirement for third parties to understand and comply with the Code. If a third party is found to have acted in a way that is contrary to the Code, there are a range of corrective actions available, from collaboration and remediation, through to the legal capacity to terminate working with that third party.

Ventia's master supply agreement terms address modern slavery risk. These apply across our supplier base and require suppliers to warrant that any modern slavery risks present in their businesses are assessed, investigated and appropriately disclosed, and that such risks are addressed through appropriate due diligence and remediation programs.

Suppliers and subcontractors are contractually required to provide all information, documents, records, and access (including access to personnel and premises) requested by Ventia, to permit Ventia to audit and verify their compliance with our contractual clause on modern slavery. Suppliers and subcontractors must also commit to the inclusion of a similar and relevant clause in all contracts they may enter with any Tier 2 suppliers while performing work under Ventia's operational control.

Eligible suppliers must also adhere to our Business Partners Standard and its associated due diligence process as well as our International Trade Controls and Anti-money Laundering Policy.

Our suppliers and subcontractors must report any confirmed modern slavery cases, develop remediation plans and act within the defined contractual timeframe.

### Modern Slavery Policy

The Ventia Modern Slavery Policy was approved by the Board in 2020 and is periodically reviewed as part of the Ventia's regular policy review process. It is due to be reviewed in 2025. Our Modern Slavery Policy outlines our commitment to implementing processes to mitigate the risk of any form of modern slavery from occurring in our operations, including slavery, servitude, forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage.

### Whistleblower Protection Policy

Our Whistleblower Protection Policy encourages the reporting of suspected misconduct or an improper situation or circumstances relating to Ventia. Examples of reportable conduct under this Policy include (but are not limited to):

- a breach of the Code of Conduct
- financial fraud or mismanagement, including tax related misconduct
- unsafe or unethical work practices or work practices which endanger the environment
- breaches of any legal or regulatory obligations; and
- any suspected breaches of Ventia's policies and standards.

The Whistleblower Protection Policy, due for review in 2025, also provides guidance on how a report may be made and the protections a whistleblower must receive.

Overseen by the Board, the Audit, Risk and Compliance Committee is provided with details of any report received under the Whistleblower Protection Policy, as well as the outcomes of any investigations and consequent corrective actions taken. A copy of this Policy can be [found on our website](#).



**Pictured:** Lane Cove Tunnel team member, Lane Cove West NSW

## Ethics and Compliance Investigation Standard

Our Ethics and Compliance Investigation Standard establishes our approach for conducting investigations related to ethical violations. Our Ethics and Compliance Standard outlines the process for identifying, reporting, and addressing potential ethical and compliance issues in alignment with legal and regulatory requirements and organisational policies.

Examples of incidents which may be investigated under this Standard include (but are not limited to):

- alleged unacceptable behaviour
- an alleged breach of safety/environmental policies and procedures
- alleged drug use or violence
- any possible illegal act
- suspected breaches of the law or regulations; and
- breaches of Ventia's Code of Conduct not defined above.

The operation of this Standard is overseen by the Group Compliance Officer. If an alleged incident meets the threshold for escalation, incidents and learnings are communicated to the Group General Counsel and the Board Audit Risk and Compliance Committee.

## Other relevant policies and standards

We have various other policies in place at Ventia to promote ethical and legal practices and behaviour in alignment with Ventia's values. These policies and standards are designed and implemented to uphold the human rights of employees, contractors, business partners, suppliers, clients and the communities in which Ventia operates, including our:

- Privacy Policy
- Procurement Policy
- Bribery and Corruption Policy
- Health and Safety Policy
- Disclosure Policy
- Securities Dealing Policy
- Diversity, Equity and Inclusion Policy
- Sustainability Policy
- Buying Standard
- Bullying and Harassment Standard
- Business Partners Standard; and
- EEO and the Prevention of Discrimination Standard.

We periodically review the effectiveness of our policies, standards and processes to ensure they align with all legal and operational initiatives or obligations, including the requirements of the Act where applicable.

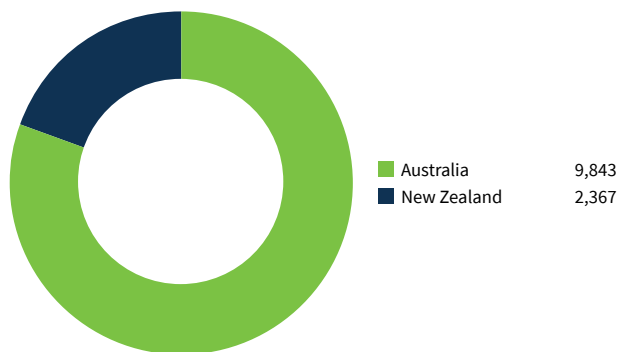
## Our supply chains

Ventia procures goods and services from approved businesses to support and supply to our operations across Australia and New Zealand. We manage procurement through our Group Supply Chain function, with local implementation exercised by our individual projects.

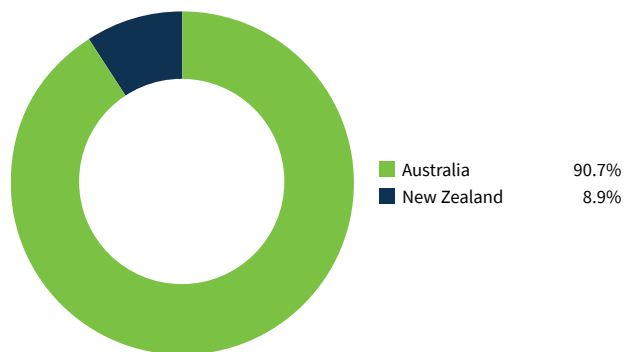
During 2024 we procured 99% of goods and services from Tier 1 (direct) suppliers based in Australia and New Zealand, continuing the trend observed in previous years and in line with our commitment to buy from local suppliers. We also procured goods and services from other regions during the same period, with North America representing the largest Tier 1 trade region for Ventia outside of Australia and New Zealand.

We directly engaged over 12,000 (Tier 1) suppliers across Ventia, spending AUD \$4.2 billion during 2024. Our diverse supply chains include a range of local, Indigenous and social enterprises across Australia and New Zealand.

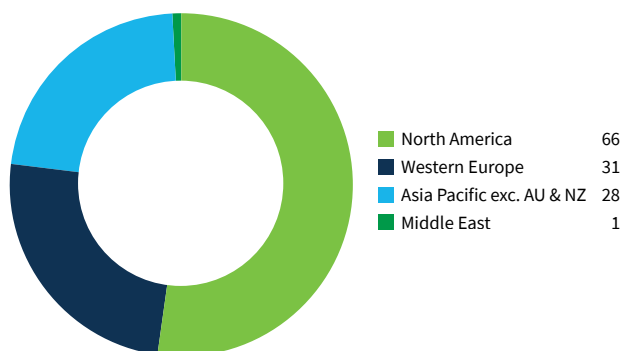
**Number of Ventia suppliers located in Australia and New Zealand (2024)**



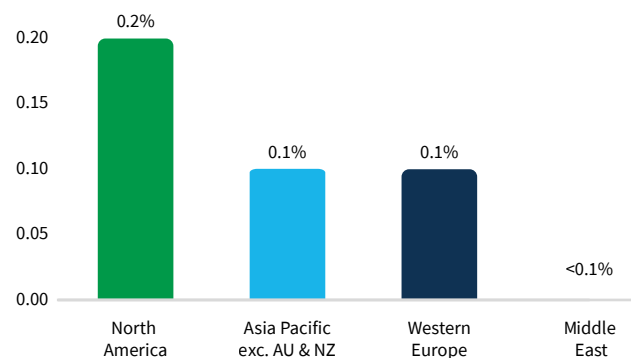
**Spend in Australia and New Zealand (2024)**



**Number of suppliers located in other regions (2024)**



**Spend in other regions (2024) (approx 0.4%)**



Individual projects directly procure goods and services to meet their specific requirements and manage any geographical supply constraints. Ventia ensured that all procurement transactions adhered to our Procurement Policy throughout the 2024 reporting period.

Ventia's Rig and Well Services business, a part of our Infrastructure Services sector, operates a facility in Queensland focused on steel fabrication, heavy equipment building and servicing<sup>1</sup>. At this location we design, manufacture, service and repair items such as drilling rigs and other specialised associated plant, transport frames, platforms, trailers and lifting gear. During 2024 we procured materials such as electrical and hydraulic equipment and ancillary components for this facility directly from Australian suppliers.

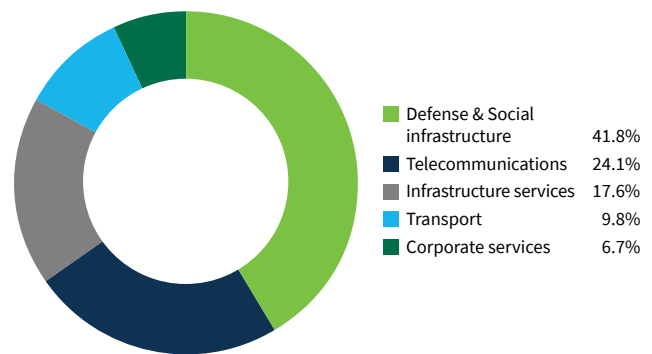
We also engage external services in this process, including professional support such as engineering verification, electrical, programming, trade and fabrication support as required. These service providers are also based in Australia.

In 2024 we also launched our Supply Chain Transformation Strategy designed to:

- consolidate our supplier base to increase leverage and efficiency
- strengthen contract coverage and compliance
- reduce administrative burden and risk; and
- drive better value from our significant spend.

Most importantly, delivery of these outcomes enable the visibility and management tools and mitigations needed to strengthen our ability to support our human rights positions across the supply chain.

#### Supply chain spend across Ventia sectors (2024)



**Pictured:** Rig & Well Services workshop, Withcott Qld

1. Ventia Infrastructure Services sector conducts manufacturing in support of our Rig and Well Services business.

## Our risk management approach

In line with the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), we assess the risk of Ventia causing, contributing or being directly linked to modern slavery as integral to Ventia's Risk Management Framework.

As part of our specific forced labour Supply Chain Risk Evaluation, all directly engaged suppliers were assessed using our risk assessment tool in 2024. The tool incorporates international validators (outlined in the following section), plus a focus on sector and industry, products and services, geographic and entity-focused risks. We also considered the commercial leverage that Ventia has with supply chain partners in our modern slavery risk and opportunity identification process.

Suppliers identified with elevated risk were then approached to participate in our targeted modern slavery due diligence process. More than 80 suppliers and subcontractors participated, and the responses we received will inform our continuous improvement throughout 2025.

Our standard supplier and subcontractor agreements include obligations highlighting our management of modern slavery risks and associated legal and governance obligations.

Should the need to remediate any confirmed modern slavery occurrence reported in our supply chains arise, remediation will be conducted in line with our business partners' engagement process. This process starts with performing an additional and targeted due diligence review, followed by a series of issues resolution steps, and escalating to cessation of all dealings with the business partner in question should no alternative resolution be devised. We acknowledge that the welfare of slavery victims is the foremost consideration for decision-makers during the remediation process in any confirmed case of modern slavery.



**Pictured:** Members of our energy networks team, Rocklea, Qld

## International validators

We continued to utilise the Global Slavery Index (GSI) as the main pillar of our risk assessment for inherent geographical risk, utilising 2023 data published by the GSI through the Walk Free Foundation in our most recent modern slavery supply chain risk assessment.

The GSI provides a country by country ranking of the number of victims of modern slavery for 182 countries. It also provides an analysis of the actions taken by governments to respond and the factors that make people vulnerable to modern slavery.

We also utilise the United States Department of Labor's List of Goods Produced by Child or Forced Labor, which details goods for which there is reason to believe are being produced by child labour or forced labour in violation of international standards, as required under the United States Trafficking Victims Protection Reauthorization Act (TVPPRA). The list comprises 169 goods from 80 countries, as published in September 2024.

## Geographic location of origin for products and services

Geographic location of the production and provision of goods or services procured by Ventia continued to be a key consideration in our due diligence process to determine associated risks within the supplier workforce, such as skill level, unionisation rates and remuneration.

## Identification of product and service risks

We assess our operations and the human rights performance of our suppliers based on risks associated with the geographical origin and the type of products or services procured. We continued our category-based approach to supplier risk management in 2024, continuing to identify opportunities to leverage our purchasing power to drive improvement and greater transparency within our supply chain.

In 2024 we directly imported a very small proportion of our total Tier 1 product purchases from overseas suppliers. Most of these suppliers are based in OECD defined low-risk countries, from North America, Asia-Pacific and Western Europe.

The analysis conducted for our 2024 supply chain indicates that human rights risks, including those risks linked to modern slavery, continued to be more prominent in the procurement of low-value transactions, such as protective and high-visibility clothing and third-party provision of cleaning services for Ventia and our clients. We focused on these categories in our supplier engagement approach during 2024.

We assess sustainability risks including the human rights/modern slavery exposure of relevant suppliers as part of selection and contract renewal processes to scrutinise if equipment and clothing supplied to Ventia have been produced in a situation likely to involve modern slavery risks, such as labour conditions.

Where suppliers are unable to satisfy Ventia that they have appropriate risk management controls in place or if they are unwilling to share this information, we may take further action, including engaging with or escalating to senior management, implementing a remediation plan or suspending their contract.

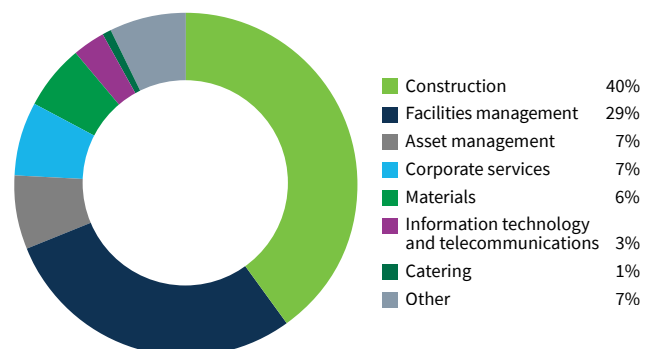
Our modern slavery risk assessment for the 2024 reporting period was conducted to identify the risk of Ventia causing, contributing to or directly being linked to modern slavery practices in our supply chains. The following products and services were identified as the most material areas of vulnerability in our operations:

- personal Protective Equipment (PPE) and workwear
- promotional items
- cleaning services and equipment
- fresh fruit, vegetables and seafood; and
- technology services and equipment.

Specific supply chain conditions related to the nature of the workforce involved in the delivery of goods or services procured, inherent geography-based modern slavery risks and the risk materiality of the commodity being procured, are factors we use in our modern slavery risk management and assessment.

Based on the location and services provided by the suppliers of the above products and services, the risk of modern slavery for these categories has been assessed as low to medium. For the 2024 reporting period we identified 296 suppliers for further engagement in line with our modern slavery Risk Management Framework, covering approximately AUD \$196 million or 5% of our annual spend.

## Spend across main supplier categories (2024)



## Risk mitigation measures

Our risk mitigation approach and due diligence process continues to evolve, using data analytics and insights from our enterprise-wide platform to support our processes. Our targeted due diligence modern slavery questionnaire is supplemented by our broad business partners due diligence process, which is applicable to all new suppliers and requires them to execute a general due diligence questionnaire.

### Due diligence outcomes

Our Modern Slavery Policy sets out our commitment to conduct periodic due diligence on our operations and supply chains, with respect to potential areas of modern slavery risk.

Appropriate modern slavery due diligence was conducted on potential business partners throughout 2024, to ensure they are not at risk of any breach of our Code of Conduct before entering into a transaction, relationship or contractual arrangement with Ventia. 18% of suppliers by spend were covered by our modern slavery due diligence in Australia and New Zealand during 2024.

We will continue to work with suppliers who have participated in our modern slavery due diligence process during previous reporting periods to demonstrably improve their mitigation of modern slavery risk through appropriate risk management.

### 2024 actions



99.3% completion of Code of Conduct training by full-time employees



Launched Supply Chain Transformation Strategy



Improved accuracy of spend data categorisation, to assist assessment of risk



More than 80 suppliers and subcontractors took part in our targeted due diligence questionnaire



Tier 2 suppliers included in our due diligence questionnaire for the first time

## Case study

### Upholding migrant workers' rights in Australia and New Zealand

Ventia adheres to the requirements of the Migration Amendment Act 2024 in Australia and the Worker Protection Act in New Zealand by implementing measures to ensure migrant worker protections are enacted.

During the Ventia employee onboarding process, we validate the necessary right-to-work documentation for all our employees, including visa holding employees. We perform comprehensive monthly audits to maintain accuracy and compliance.

Contributing to our monthly audits, our weekly compliance activities include the verification of visa documentation for new employees on visas, and conducting Visa Entitlement Verification Online (VEVO) checks to ensure accurate working rights information is up to date in our enterprise resource planning software, SAP.

We also monitor employees with approaching visa end dates or passport expiry, engaging with these employees a month before the date is reached, with weekly check-ins leading up to the end-date. We conduct fortnightly audits to confirm work rights for student visa holders, and monthly compliance checks are performed for employees on bridging visas, including new VEVO checks to confirm updated visa status and assess current working circumstances.

To ensure consistency across our operations, our People Services team centrally coordinates Ventia's work visa sponsorship and engages regularly with migration agents.

These activities all contribute toward a robust, fair and inclusive process to protect our employees rights as well as ensuring good governance at Ventia.

## Outcome

Ventia did not identify any instances of modern slavery related to our supply chains during 2024 relevant to this Statement.

We acknowledge this outcome does not prove the absence of modern slavery in our supply chains as we operate and procure goods and services from regions where modern slavery is present. We continue to monitor and investigate any emerging issues.

## Measurement of effectiveness

We are committed to measuring how effective our risk mitigation actions are. During the 2024 reporting period we measured the effectiveness of our modern slavery risk mitigation response based on:

- our due diligence processes
- supply chain management and procurement
- payroll audits conducted by internal and external experts
- employment terms and conditions, which are constantly reviewed by our Group People & Capability function for compliance
- a review of the integrity, accuracy and relevance of data reported by suppliers; and
- our grievance mechanism – whistleblower reports.

Our supply chain approach focuses on improving risk visibility across our large and diverse supplier base. We continued to focus on the accuracy and completeness of procurement data during 2024.

Our due diligence process captures the volume and quality of responses submitted by our suppliers related to their self-assessment of how they manage modern slavery risks in their supply chains. 80 Tier 1 suppliers submitted a response to our targeted modern slavery due diligence questionnaire in 2024. A total of 16 Tier 2 suppliers also provided responses to our questionnaire in 2024.

We are in the process of identifying tangible modern slavery risk management improvement actions to be delivered in collaboration with suppliers who participated in our modern slavery due diligence process during 2024.

Our people and capability systems, policies and processes are maintained to ensure that we manage modern slavery risks internally, as we lead and manage our people at Ventia.

Our independent whistleblower line continues to be our main grievance mechanism and a significant input into how we measure the effectiveness of our modern slavery risk mitigation actions.

Our 2024 annual modern slavery risk assessment covered the entirety of our Tier 1 supply chain as set out in our modern slavery risk management approach. We increased our visibility of the modern slavery risks which may be present in our business and supply chains, with a focus on collaboration with suppliers, while enforcing our due diligence and contractual compliance processes.

## Consultation and approval

The Board is responsible for the overall corporate governance of Ventia and its controlled entities (**reporting entities**) as set out in [Appendix 1](#). All Ventia operating reporting entities have procurement professionals assigned to their specific businesses. These employees operate in conjunction with Group management and are directly involved in all matters relating to Modern Slavery Act compliance – including the planning and review of procurement activities across the entire business.

The Statement has been prepared in conjunction with Ventia internal stakeholders including:

- Group Sustainability
- People, Safety & Culture
- Group Supply Chain including Procurement; and
- Legal, Risk & Compliance.

A draft version of this Statement was provided to all reporting entities, with information including the requirements of modern slavery reporting and Ventia's approach to modern slavery mitigation. Feedback received as part of this consultation process was incorporated into this statement.

The Statement was reviewed by Ventia's Executive Leadership Team and the Board Safety and Sustainability Committee prior to approval by the Ventia Board.

## Annual assessment plan progress

Role	Objectives	Measure of effectiveness	2024 progress
As a purchaser of goods and services	Improve the quality of the modern slavery self-assessment questionnaire.	Percentage of suppliers completing the self-assessment.	Ventia's supplier onboarding process requires that suppliers accept terms mandating compliance with Ventia's anti-Bribery and Corruption policies and to observe and comply with our Code of Conduct.  18% of suppliers by spend were covered by Ventia's modern slavery due diligence.
	Increase participation with industry.	Report on participation with industry groups and forums to demonstrate our commitment to improvements in assessing risk in our supply chains.	Ventia continued to contribute to the Infrastructure Sustainability Council's (ISC) Modern Slavery Coalition, and a Ventia representative presented our asset management approach to the management of modern slavery risk in a presentation to the ISC Connect conference in 2024.  Ventia conducted an evaluation of controls, systems and processes utilised during a tunnel maintenance closure to identify potentially vulnerable subcontractors (see case study).
	Ongoing supply chains risk analysis.	Improve transparency of Tier 2 suppliers.  Increase collaboration with suppliers identified with potential modern slavery risks.	Improved accuracy of 2024 spend data.  Ongoing review of Ventia's processes to identify opportunities to improve transparency of Tier 2 suppliers, including collaboration with the ISC Modern Slavery Coalition on supplier self-assessment suitable to the infrastructure sector in Australia.  16 Tier 2 suppliers participated in our 2024 due diligence process.
As an employer	Provide training.	Code of Conduct training is mandatory and includes our approach to modern slavery.	99.3% of our permanent full-time employees completed the annual training on our Code in 2024, including our modern slavery awareness module.
	Increase awareness of modern slavery risk mitigation and grievance mechanisms.	Collate data to support training attendance and enhance online resources for all employees.  Collect and report on data where grievance mechanisms are utilised.	Training on modern slavery issues and Ventia's Whistleblower Protection Policy remains an important focus in our core induction training materials and as Ventia continues to refine and improve ESG processes and materials.  In 2024 no reports of modern slavery issues were received.
	Conduct independent audit of cleaning staff payroll compliance with modern awards.	Independent audit report highlights any issues of concern. Action plan implemented to address identified issues.	Consistent with previous years, Ventia instructed independent auditors with specific expertise in payroll compliance to review its high-risk payrolls. These audits did not disclose any systemic issues of concern in 2024.

Our priority is to work with our key stakeholders to optimise the systems and processes that support our modern slavery risk identification and mitigation. A clear and collaborative pathway is essential to the remediation of any adverse effects identified in our operations and supply chains.

## External collaboration

Our continuous improvement approach to tackling modern slavery risks in our operations leverages consultation with external stakeholders. This requires us to engage with customers, suppliers and other infrastructure service providers in Australia and New Zealand.

We continue to be a member and contributor to the Infrastructure Sustainability Council's (ISC) Modern Slavery Coalition (**the Coalition**), which focuses on accelerating the eradication of modern slavery in the infrastructure supply chain by shifting the industry from reactive compliance to transformational leadership.

### Case study

#### Transurban and Ventia collaborate to better identify potentially vulnerable contractors

Ventia is engaged by Transurban to deliver maintenance and incident response services at a variety of its road assets, including tunnels in New South Wales and Queensland. Tunnel closures are scheduled to perform maintenance activities and are generally at nighttime to minimise impact on traffic flow. Maintenance activities include a range of works performed by subcontractors engaged by Ventia.

We collaborated with Transurban during a maintenance closure on a tunnel asset in New South Wales in 2024, assessing both organisations' controls and processes to identify subcontracted workers with the potential to be vulnerable to exploitation and who could be in a situation of modern slavery. This initiative was aimed at further understanding the systems and processes Ventia and Transurban have in place to prevent modern slavery practices from occurring during maintenance activities, along with the checkpoints available in our mutual processes to identify potentially vulnerable subcontracted workers.

Our initial assessment found that both organisations utilise multiple verification systems to check and collect worker information, including technical credentials, which may reduce the likelihood of modern slavery occurring and of engaged workers becoming exploited.

We also identified that some of the maintenance works performed for the event do not require the engagement of formally qualified workers, so no formal technical credentials are checked. Workers performing tunnel maintenance works not requiring technical credentials only need to provide personal documentation, such as a driver's licence and a white card. In cases where limited checks are undertaken there could be an elevated risk that workers may be controlled by a third-party; more so than for the roles where multiple checks take place.



**Pictured:** Lane Cove Tunnel Ventia team members, Lane Cove West NSW

During the tunnel closure event, all workers were provided relevant information about modern slavery risks to workers, including a toolbox talk highlighting the links between poor safety, labour rights issues and modern slavery.

The insights from this collaborative study will inform future reviews of relevant processes and consideration for the supplier and subcontractor agreements of both organisations.

## Appendix 1 – Reporting entities

Name of Entity	Name of Entity
<b>Australia</b>	Piver Pty Ltd
BE & MG Pty Ltd	Silcar Pty Ltd
BR & I Pty Ltd	Ten Rivers Pty Ltd
Broadspectrum (East Timor) Pty Ltd	TS (Procurement) Pty Ltd
Broadspectrum (Finance) Pty Ltd	Ven Air Pty Ltd
Broadspectrum (Holdings) Pty Ltd	Ventia Asset Infrastructure Services Pty Limited
Broadspectrum (International) Pty Ltd	Ventia Australia Pty Ltd
Broadspectrum (Oil & Gas) Pty Ltd	Ventia Environmental Services Pty Limited
Broadspectrum (USM) Holdings Pty Ltd	Ventia Finco Pty Limited
Broadspectrum Australia (QLD) Pty Ltd	Ventia Holdings I Pty Limited
Broadspectrum Escrow Pty Ltd	Ventia IP Holdings Pty Ltd
Broadspectrum Holdings (Delaware) Pty Ltd	Ventia Leasing Pty Limited
Broadspectrum Pty Ltd	Ventia Property Pty Ltd
Broadspectrum Services Pty Ltd	Ventia Pty Limited
BRS Holdco Pty Ltd	Ventia Services Group EIP Pty Ltd
ChargePoint Pty Limited	Ventia Services Pty Ltd
Delron Cleaning Pty Ltd	Ventia Solutions Pty Limited
Delron Group Facility Services Pty Limited	Ventia Training Pty Ltd
Eastern Catering Services Holdings Pty Ltd	Ventia Utility Services Pty Limited
Eastern Catering Services Pty Ltd	Vision Hold Pty Limited
Eastern Pressure Control Pty Ltd	Visionstream Australia Pty Limited
Eastern Well Rigs Pty Ltd	Visionstream Pty Limited
Eastern Well Service No 2 Pty Ltd	Visionstream Services Pty Limited
Easternwell Drilling Holdings Pty Ltd	<b>New Zealand</b>
Easternwell Drilling Services Assets Pty Ltd	Landscape Solutions Pty Limited
Easternwell Drilling Services Labour Pty Ltd	BRS (NZ Holdings) Limited
Easternwell Drilling Services Holdings Pty Ltd	BRS (NZ) Limited
Easternwell Energy Rigs Pty Ltd	TSNZ Pulp & Paper Maintenance Limited
Easternwell Group Assets Pty Ltd	Ventia NZ Limited
Easternwell Group Investments Pty Limited	Ventia NZ Operations Limited
Easternwell Group Operations Pty Ltd	Ventia Pty Limited (NZ Branch)
Easternwell Group Pty Ltd	Visionstream NZ Ltd
Easternwell WA Pty Ltd	<b>Other Regions</b>
Gorey & Cole Drillers Pty Ltd	Transfield Services (Asia) Sdn Bhd <sup>1</sup>
Gorey & Cole Holdings Pty Ltd	Silcar Nouvelle-Caledonie SAS <sup>1</sup>
ICD (Asia Pacific) Pty Limited	Ventia Deco LLC
O.G.C. Services Pty Ltd	

1. The entities were deregistered during FY24

# Statement compliance

Australian Modern Slavery Act mandatory reporting criteria	Ventia response	Statement Page	Detail
a) Identify the reporting entity.	Introduction	1	<ul style="list-style-type: none"> <li>Ventia Services Group identified as the main reporting entity.</li> </ul>
	Appendix 1	16	<ul style="list-style-type: none"> <li>List of all reporting entities covered by the Statement.</li> </ul>
b) Describe the reporting entity's structure, operations and supply chains.	Our operations	2	<ul style="list-style-type: none"> <li>Four Ventia sectors described.</li> <li>Ventia operational footprint infographic.</li> </ul>
	Our supply chains	8, 9	<ul style="list-style-type: none"> <li>Suppliers located outside Australia and New Zealand infographic.</li> <li>Ventia spend by region infographic.</li> <li>Supply chain spend split across Ventia sectors infographic.</li> </ul>
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our risk management approach	10, 11	<ul style="list-style-type: none"> <li>Our risk management approach.</li> <li>International validators.</li> </ul>
	Identification of product and service risks	11	<ul style="list-style-type: none"> <li>Geographic location of products and services.</li> <li>Identification of product and service risks.</li> </ul>
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Risk mitigation measures	12, 13	<ul style="list-style-type: none"> <li>Risk mitigation measures.</li> <li>Due diligence outcomes.</li> <li>See '<i>Upholding visa rights for labour workers in Australia and New Zealand</i>' case study.</li> </ul>
	Annual assessment plan progress	14	<ul style="list-style-type: none"> <li>Annual assessment plan progress.</li> </ul>
e) Describe how the reporting entity assesses the effectiveness of these actions.	Measurement of effectiveness	13	<ul style="list-style-type: none"> <li>Measurement of effectiveness.</li> </ul>
f) Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Consultation and approval	13	<ul style="list-style-type: none"> <li>Process of consultation.</li> </ul>
g) Any other information that the reporting entity or the entity giving the statement, considers relevant.	External collaboration	15	<ul style="list-style-type: none"> <li>Ventia's engagement with the ISC Modern Slavery Coalition.</li> <li>Evaluation of controls, systems and processes utilised during a tunnel maintenance closure to identify potentially vulnerable subcontractors – see '<i>Transurban and Ventia collaborate to better identify potentially vulnerable contractors</i>' case study.</li> <li>Table of controlled entities provided in Appendix 1.</li> </ul>

