

Modern Slavery Statement 2024





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Transurban reporting suite

For more information on WestConnex and its operations and assets, see:

- **FY24 Corporate Report** • [westconnex.com.au](https://www.westconnex.com.au)
- **FY24 Sustainability Data Pack** • [transurban.com](https://www.transurban.com)

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 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.

WestConnex (or 'WestConnex Group') is 100% owned by the stapled entities:

- STP PT Pty Limited as trustee for the STP Project Trust; and
- STP AT Pty Limited as trustee for the STP Asset Trust (together, "STP").

This joint Statement is 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.

The Transurban group owns 50% of STP. Transurban's wholly-owned subsidiary, Tollast Pty Limited, has been appointed as the operator of WestConnex ("Transurban").

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 the Transurban FY24 Corporate Report



FY24 in review

This is our fifth Modern Slavery Statement, published in accordance with the Modern Slavery Act 2018 (Cth). While we did not detect or receive alerts about any actual or suspected modern slavery instances in our operations or supply chains over the reporting period, we recognise this does not mean that modern slavery was not present.

This Statement details actions we've taken to improve our ability, where possible, to mitigate modern slavery risks in our operations and supply chains during FY24, and acknowledges that our work in this regard is ongoing.

We also acknowledge that our roads are used by customers who may be engaging in, or victims of, modern slavery activities. While we may not cause or contribute to these activities, we continue working to better identify potential instances of modern slavery on our roads and to improve the awareness and capabilities of teams monitoring our roads.

As the operator of WestConnex, Transurban's overall approach to mitigating modern slavery risks as they relate to the WestConnex business during FY24 encompassed:

- **Conducting ongoing due diligence**

For example, introducing new risk-based rules into our supplier onboarding processes to identify, assess and respond to modern slavery risks earlier in the procurement process

- **Strengthening our policies and procedures**

For example, elevating our existing Contract Management Framework into a policy that guides and governs our operations; and strengthening our Supplier Sustainability Code of Practice and Human Rights Policy

- **Building skills and awareness across our business, supply chains and industry**

For example, sharing our lessons learned at industry conferences and delivering tailored training to suppliers.

FY18–FY21

- Transurban Sustainable Procurement Program established, aligned to ISO 20400:2017.
- Transurban (as Operator of WestConnex) partnered with the Infrastructure Sustainability Council (ISC) to establish the Modern Slavery Coalition.
- Transurban established a dedicated sustainable procurement leadership role.
- Conducted modern slavery awareness training and workshops for our people and key suppliers.
- Published our inaugural Modern Slavery Statements (FY20).

FY22

- Reviewed and strengthened tools and processes used to assess and address modern slavery risks.
- With Transurban, piloted first responders training to identify and escalate potential or actual instances of modern slavery.

FY23

- Embedded the use of Transurban's purpose-designed in-house supplier evaluation tool.
- With industry peers, 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 chains.

FY24

- Updated key policies and codes of practice to strengthen our approach to identifying and managing modern slavery risks.
- Our Operator, fast-tracked supplier engagement on modern slavery by bringing digital labour rights and modern slavery triage actions forward in the onboarding process.





About us and our structure

Sydney Transport Partners

Sydney Transport Partners or (STP) comprises the following stapled entities:

- STP PT Pty Limited as trustee for the STP Project Trust
- STP AT Pty Limited as trustee for the STP Asset Trust.

These entities act as holding vehicles for a consortium of Investors' interests in the WestConnex toll roads in Sydney, New South Wales.

In 2018, 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%.

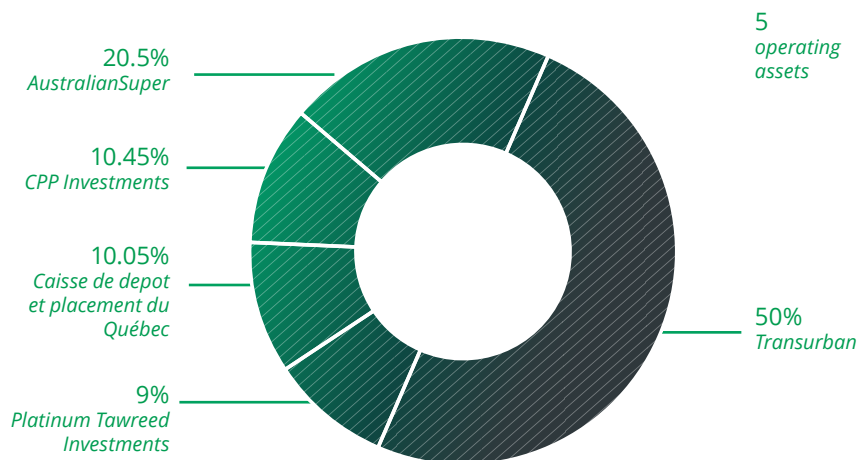
As STP is purely an investment vehicle, these entities do not have their own offices or employees and do not undertake any significant activities in their own right. STP Investors are jointly responsible for decision making in relation to STP.

WestConnex

WestConnex is a 33-kilometre, traffic-light-free motorway network that 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 and is operated by Transurban.

The design and construction of WestConnex was delivered in four stages:

1. M4 (opened in 2019)
2. M8 (opened in 2020)
3. M4-M8 Link (opened in 2023)
4. Rozelle Interchange, delivered by the NSW Government (opened in 2023)





Our operations¹

STP's operations principally relate to the management of WestConnex. Transurban (part owner of STP Group) oversees WestConnex's operations.

The Rozelle Interchange, the final part of the WestConnex network, opened in FY24. The interchange was delivered by the NSW Government and opened to traffic in November 2023. STP and our appointed operator, Transurban, became responsible for the Rozelle Interchange's operations from its opening date.

WestConnex Traffic Control Room Operators (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 within the network's maintenance and operations during 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.

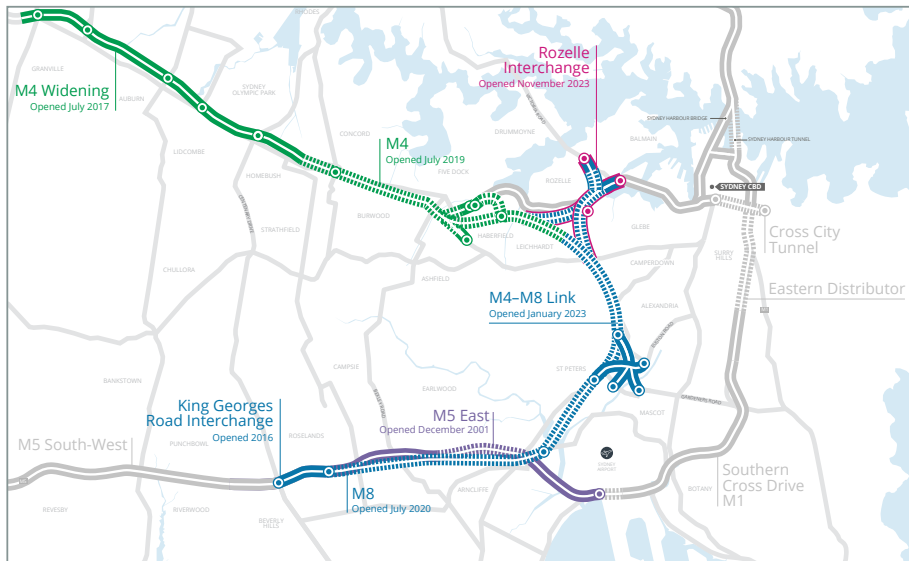
For more information on WestConnex visit westconnex.com.au or refer to Transurban's [2024 Corporate Report](#).

Customer experiences

Customers who use WestConnex roads largely manage their toll accounts online or via mobile apps, where they can access information on toll pricing, trip costs and tolling points. This includes the Linkt Trip Compare tool, available for travel on WestConnex, which enables customers to compare time savings across tolled and untolled routes and see their potential fuel and Co2 emission savings. Our customers interact with us and manage their toll payments via Transurban's retail brands.

Our people

STP and WestConnex do not have employees, offices or operations. Following the completion of WestConnex's major project construction, and the opening of its final sections, in FY24, a small number of remaining employees were transitioned to Transurban as the operator of WestConnex.



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

¹ In this Statement, "operations" refers to management of WestConnex undertaken by 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



Our supply chain¹

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

WestConnex procures goods and services from suppliers across disciplines ranging from large global and multinational organisations that provide critical technology, to Australian-based maintenance service providers and local and small business enterprises.

With construction of WestConnex completed, and the Rozelle Interchange now opened to traffic, WestConnex's supply chain has shifted to the goods and services used in the maintenance and operations of the road assets, reducing overall spend volume. During FY24, more than 140 direct suppliers were used to provide goods or services supporting the operations and maintenance of WestConnex.

Our top supplier categories for FY24, comprising more than 90% of our total spend are shown in Table 1 below.

More than 95% of our annual spend is with suppliers whose direct trading site or headquarters are located in Australia. We engage with direct suppliers in two countries outside Australia: New Zealand and the United States. We recognise that labour risks may be greater further upstream of the suppliers we directly engage with, both in Australia and offshore. We are beginning to assess these risks by mapping the supply chain of specific materials as well as tracking potentially vulnerable groups used in the labour force.





More than
\$48M
in annual managed spend

More than
140
direct suppliers

More than
95%
spend with Australian suppliers

Direct suppliers located in
3 countries
Australia, New Zealand and the US

Table 1: Top supplier categories and activities

Category	Activity	Suppliers	Typical activities
 Operations and maintenance 32%	Maintaining road safety and operating standards in line with contractual requirements	Selected incident response and maintenance suppliers Supplier subcontractors	<ul style="list-style-type: none">• Road-specific operations and maintenance activities: civil, mechanical and electrical works; and incident response services.• Suppliers may appoint subcontractors to deliver some activities. Road maintenance works may involve some heavy works and other construction activities.
 Customer and tolling 26%	Communicating with stakeholders to manage and operate roads	Selected physical and digital communications suppliers Supplier subcontractors	<ul style="list-style-type: none">• Mail house, printing, media, PR and advertising services used for sharing information with our stakeholders, including government, communities and customers travelling on our roads.• Suppliers may operate physical mail houses, printing or digital information services.
 Professional services and consulting 24%	Delivering services to corporate management	Selected consultants	<ul style="list-style-type: none">• Desktop-based specialist services: legal support; strategy development; and general business and financial consulting.
 Banking and finance 10%	Providing banking systems	Selected domestic and international providers	<ul style="list-style-type: none">• Corporate banking and agent support, insurances and international facility services.

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

Labour in our supply chains

We use both direct and indirect labour services.

We use indirect labour services for activities including:

- **maintenance services:** for example, landscaping, electrical and mechanical trades, incident response services and machinery operators
- **road and infrastructure upgrades and maintenance:** for example, truck drivers, asphalt paving and civil contractor services
- **skilled labour:** for example, professional services, consultants and labour used by our corporate supplier partners.

Indirect labour services also exist upstream in our supply chains, for example: factory labourers manufacturing goods, materials or components; and transport, shipping and logistics workers. Further labour is used by subcontractors within each tier of the supply chain.

Some labour services include casual or migrant workers, with labour sometimes delivered in shifts, for example, overnight and weekend maintenance works, 24/7 incident response services, and office-cleaning activities.

Procurement Team

WestConnex's procurement is managed and integrated into Transurban's Procurement Team's activities. This team's wide-ranging responsibilities include category management, strategic sourcing, procurement operations, the Transurban Sustainable Procurement Program and contract management framework.

Sustainable Procurement Program

Transurban's Sustainable Procurement Program was established at WestConnex in FY20. This program 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 United Nations' Sustainable Development Goals (UN SDGs).

See Our approach on page 10 for more information.

STP and WestConnex entities without supply chains

STP and WestConnex's structure include multiple entities (including Reporting Entities), that do not engage with suppliers to purchase goods or services and do not have direct supply chain exposure to modern slavery risks.



Modern slavery risks

As was the case in FY23, STP 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.

We recognise the importance of identifying modern slavery risks within our supply chains. We also recognise the widespread nature of modern slavery means people perpetrating, or people trapped in, situations of modern slavery may potentially travel on our roads.

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

The UNGPs establish a framework for businesses to guide the prevention of, and response to involvement in, human rights harm – including modern slavery (see the example shown in Table 2). Our risk-assessment processes are designed to align with this framework. This includes assessing how we could potentially cause, contribute, or be directly linked to potential or actual instances of modern slavery. Our risk identification and assessment processes apply across STP, including the entities we own or control.

Sustainable Procurement Risk Heat Map

Transurban's Sustainable Procurement Risk Heat Map provides a macro view of the goods and services' procurement categories with potentially higher risks (likelihood and severity) of modern slavery occurring. 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.

The map is updated at least annually, primarily via data provided by our Tier 1 suppliers (for example: country, industry and commodity data).

Additionally, our assessment considers higher-risk activities that may exist deeper within our supply chains (for example, risk associated with labour in the manufacturing of components, or labour used in the extraction of raw materials) when we attribute risks. However, we acknowledge supply chains can be complex and our risk-identification approach will evolve as we identify and assess these deeper supply chain activities.

This map uses the latest information available, including:

- [2023 Trafficking in Persons Report – United States Department of State](#)
- [List of Goods Produced by Child Labor or Forced Labor, US Department of Labor](#)
- [Global Slavery Index, Walk Free](#)

Assessment outputs

With no employees or offices, STP has no risk of directly causing or contributing to modern slavery within its operations.

STP's involvement in contributing to or being directly linked to modern slavery risks to people principally sits in the supply chains of goods and services to the entities STP owns or controls.

STP's more inherent modern slavery risks exist within our supplier relationships, where our involvement could link us with negative impacts to people. These risks can be inherently higher due to the geographic locations where goods are made or services are performed, such as countries with no or low protection for workers, or weak rules of law. The types of industries or sectors also indicate varying degrees of risks to people due to common poor practices, reliance on low-skilled labour, temporary labour, migrant labour or other groups of people who may be more vulnerable to modern slavery risks. For this reason, our modern slavery risk management approach includes a strong focus on our supply chain relationships and activities.

During FY24, in conjunction and alignment with the Transurban approach, we continued assessing our supply-chain relationship risks and engaged with our suppliers directly and through industry engagement to discuss and drive modern slavery risk mitigation capabilities. We prioritised collaborating with our Tier 1 suppliers in both assessing and addressing modern slavery risks in our shared supply chains.

Table 2: Continuum of involvement framework example

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

Priority risk categories and assessment

STP's supply chain includes priority-risk categories. Table 3 explains these and also details our priority-risk-category management response.

Across all identified priority-risk categories, our FY24 assessment indicated it is unlikely STP or WestConnex would cause or contribute to modern slavery due to the proximity of modern slavery risks more likely to occur in complex upstream supply chains. However, we recognise that we could be directly linked to labour rights and modern slavery impacts through our supply chains.

We also recognise these risks could be enabled or exacerbated through action or inaction by any actor in our supply chain, potentially leading to negative impacts on vulnerable people. If these circumstances occurred, any linked involvement could potentially be elevated to 'contributing' to negative impacts.

We also recognise that further categories of risk exist, including technology and information and communication technology (ICT). We assess technology and ICT equipment suppliers using Transurban's detailed supplier evaluation process and continue to track their actions and disclosures to assess and address modern slavery risks. Many of these suppliers are large multi-

national technology providers who have significant leverage with global supply chains to address risks.

Together with Transurban as 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 risks to people.



Table 3: Priority risk categories and responses

Priority risk category	Vulnerability, prevalence and modern slavery inheritance	Transurban's priority-risk responses
Facilities services (including onsite cleaning services)	<p>Facilities services, including cleaning services, are considered a high-risk category due to the industry's reliance on: migrant, visa holder and gig workers; subcontracted labour; the basic skillsets required; and limited barriers to accessing work.</p> <p>All these elements increase vulnerability to labour, modern slavery and human rights abuses – for example, debt bondage, forced labour and coercive and exploitative situations.</p> <p>As the facilities and cleaning services are predominately engaged through Transurban, this work has been identified in their modern slavery statement.</p> <p>Given the industry's ongoing high-risk status, including its labour sources and established operational practices, vigilance remains necessary.</p>	<ul style="list-style-type: none"> Reviewed facilities services suppliers using the supplier evaluation tool Multilingual posters (in targeted languages) are displayed in Transurban offices' cleaning cupboards, including an easy-access QR code Contract management meeting engagement included shared actions to prevent risks to vulnerable cleaners
Construction materials	<p>Our major project completion and operations and maintenance activities include the use of raw materials and components that may be assembled in, or originate from, countries where people are more vulnerable to labour and modern slavery risks, and where modern slavery is more prevalent.</p> <p>Construction materials such as steel, pre-cast concrete, imported materials, electrical equipment, components and wiring could potentially be manufactured at sites engaging in forced labour or deceptive recruiting. Further, raw materials used in components could be mined by exploited children in dangerous environments.</p>	<ul style="list-style-type: none"> Reviewed construction material providers using our supplier evaluation tool Identified additional Tier 2 suppliers and conducted desktop evaluations where information was available Raised awareness and advocated across our industry through the IS Coalition (see page 16)
Promotional items and PPE	<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 these categories to be higher risk.</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 deeper within supply chains.</p>	<ul style="list-style-type: none"> Reviewed our supplier evaluation of promotional items and PPE vendors Received, reviewed and assessed audits of Tier 2 factories manufacturing our most common purchased PPE items (see page 12)



Our approach

While our overall approach to managing modern slavery risks has remained consistent across all reporting periods to date, we are continuously working to improve and enhance aspects of our approach.

Governance

STP's boards have overall oversight of STP and WestConnex, including entities that are owned or controlled.

The processes and practices WestConnex applies in managing modern slavery risks form part of an overarching risk management program and are subject to the oversight of the WestConnex boards and their committees.

The Transurban Procurement Team implements the Sustainable Procurement Program. This program determines the actions Transurban will take as our operator in helping to assess and address modern slavery risks in our supply chains. The team also collaborates with experts in developing and delivering targeted modern slavery training. And we review best-practice guidance, research, global and sector benchmarking and external assessments to help us improve our approach.

The Transurban Sustainable Procurement Business Leadership Group oversees implementation of agreed actions that

assess and address modern slavery risks and sustainable procurement activities, including actions relating to WestConnex operations. This group comprises senior leaders from across Transurban's WestConnex operations including: procurement; sustainable procurement; sustainability; social licence; finance and business services; major projects; operations; health, safety and environment; belonging, wellbeing; compliance and privacy; legal; and customer and technology vendor services.

This group met three times during FY24, and each meeting included updates on modern slavery issues such as emerging risks, legislative changes and progress in combatting modern slavery, provided by Transurban's Sustainable Procurement Manager. The group also discussed topics such as:

- understanding the Australian Modern Slavery Act 2018 (Cth) statutory review, including Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024 (Cth) amendments

- tracking proposed Australian and international legislative reform, such as amendments to the Fair Work Act 2009 (Cth) by the Fair Work Legislation Amendment (Closing Loopholes) Bill 2023 (Cth) and Labour-Hire law changes
- updating the Supplier Sustainability Code of Practice and Human Rights Policy
- understanding existing and emerging labour and modern slavery issues in Australia and abroad, including raising awareness on migration statistics of vulnerable groups and heightened risks in conflict
- engaging with suppliers and industry on modern slavery, including through training, collaboration and sharing progress and findings from our supplier evaluation tool and supply chain mapping work.





Policies and procedures

STP and WestConnex maintain a suite of policies and procedures that sets out the overall approach to modern slavery risks within the operations and supply chains of these entities. These policies and procedures are managed and implemented by Transurban as operator of WestConnex and are aligned with Transurban's own policies.

Contractors, suppliers and entities are expected to comply with these policies and procedures, and this expectation is reflected in supplier contractual controls. Where

businesses outside Australia are subject to local law requirements that necessitate adopting separate policies, we expect these policies will be aligned, to the extent possible, with our own. Setting unified expectations and standards across both operations and supply chains, and driving consistent policy application, are key elements of our approach to managing modern slavery risks.

Policies and procedures are reviewed regularly, and material policy breaches are reported to the relevant group Board. Relevant policies are listed and detailed in the table below.

Table 4: Relevant Transurban policies and procedures

	Policy or procedure	Scope and description
Public	Human Rights Policy	Describes how we aim to fulfill our human rights commitments, including reducing and responding to adverse human rights impacts (including modern slavery) and provides guidelines for actions on implementation.
	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.
	Supplier Sustainability Code of Practice (SSCoP)	Sets out the minimum standards and leadership expectations new and existing suppliers must meet –including for labour and human rights; and encourages suppliers to go beyond legal compliance in advancing their social and environmental approaches.
	Whistleblower Policy	Explains how we support reporting of issues, including reporting indicators of potential or actual cases of modern slavery. Provides information to support trust and transparency in the mechanism and process of remediation.
	Anti-Bribery Corruption and Fraud Policy	Outlines our approach in relation to the prevention, detection, deterrence and management of Bribery, Corruption and Fraud risks. Applies to employees, contingent workers, consultants and suppliers of goods or services.
	Conflicts Management Policy	Defines our approach to managing conflicts of interest, requiring the declaration of any potential or actual conflicts of interest and appropriate response strategies. Applies to employees, contractors, consultants or suppliers of goods or services to Transurban as operator of WestConnex.
Internal	Procurement Policy	Commits to advance alignment with ISO 20400:2017; and to include sustainability considerations (including human rights) in our sourcing processes. Sets out procurement requirements, including: high-risk category triage; risk heat map use; contract and purchase order processes; and policy breach measures.
	Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines	Details how issues relating to actual or potential modern slavery in our supply chains can be raised. Explains triage and assessment processes and remediation actions. Processes align with our Whistleblower Policy. See Grievances and remedy on page 14 for more information.
	Contract Management Framework	Provides a standardised contract management and administration approach. Provides guidance for employees on responsible and sustainable procurement. Describes contract management roles and accountabilities lifecycle, from initiation to contract close out.



Supply chain due diligence

Our due diligence processes support our assessment of, and responses to, modern slavery, material environmental and identified human rights risks. Our approach to assessing actual or potential modern slavery risks remains holistic. 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 due diligence activities into our supply chain management – including the key controls, tools and processes our operator, Transurban, uses for WestConnex across the procurement lifecycle. Our procurement lifecycle includes multiple assessment points as well as actions that test whether our procurement could cause, contribute or be directly linked to potential or actual instances of modern slavery or adverse human rights impacts. This includes reviewing our potential spend against high-risk categories.

Suppliers can be triaged through to Transurban's Sustainable Procurement Manager for investigation and assessment of their labour and modern slavery actions through the deployment of the Transurban enterprise supplier onboarding tool and suppliers can be re-checked at any point in their lifecycle.

We continue to learn from our supplier engagements and use these learnings to improve our processes and better mitigate and reduce risks to people in our extended supply chains. We have also completed due diligence assessments for business partners and customers as members of their supply chains and through our connected relationships.

Due diligence tools

We conduct due diligence throughout the supplier engagement lifecycle, via the tools described in Table 6. These tools collectively drive ongoing risk monitoring, tailored to each procurement stage. Our due diligence approach is under ongoing review, including through collecting stakeholder feedback, to improve our effectiveness at identifying risks.

Evaluating suppliers

We assess suppliers' governance, modern

slavery risk mitigations and provision of mechanisms for raising concerns using Transurban's Supplier Evaluation Tool.

This year, our operator, Transurban, continued to expand the coverage of high-risk and priority-group WestConnex suppliers assessed using this tool.

During the reporting period, further issue titles were added to our assessments, enabling tracking of indicators on actions to prevent discrimination and harassment and to promote equal opportunity and remuneration. We also introduced more extensive environmental and social sustainability requirements, aligned to the enhancements made to our Supplier Sustainability Code of Practice (SSCoP).

We are now using this tool to track Transurban and WestConnex high-risk and high-spend suppliers on an annual basis, and the assessments of residual suppliers or business partners within a 24-month cycle.

The supplier evaluation tool is helping us better identify suppliers, industries or categories where people could be at an elevated risk of modern slavery due to vulnerability, such as the use of labour hire or migrant labour in suppliers' operations or in their supply chains.

The tool also provides insights into the sophistication of our supplier and business partners' approaches to modern slavery risk management. For example, we can determine a suppliers' current level of modern slavery governance by reviewing its existing modern slavery policies and implementation progress. We capture and assess the existence and quality of codes of conduct, modern slavery and human rights' policies, mechanisms for suppliers and their subcontracted suppliers to raise concerns and policies for managing these reports.

Supplier assessments are scored on measures outlined in Table 5.

Assessing Tier 2 PPE factory audits

During FY23, we enhanced our due diligence approach to high-risk category promotional item and personal protective equipment (PPE) suppliers by engaging with them to request further information on Tier 2 factories upstream in our supply chains.

Conducting independent social and labour audits in offshore factories provides greater oversight into the demographics of any vulnerable people, the conditions in the workplace and potential risks to people.

Our supplier collaboratively shared details from social labour audits undertaken at Tier 2 factories producing our most-commonly purchased PPE items – items that help keep our workforce visible when onsite.

This year, we reviewed these audits provided by our supplier. All identified factories producing the selected PPE items were based in China. Audit findings and observations included some labour-related indicators. None of these findings were assessed as critical non-compliances due to worker awareness, and their voluntary nature.

Other observations included worker's access to and awareness of mechanisms for raising concerns: grievance channels – including hotlines, confidential email and worker representation – were available and known to all workers.

Corrective Action Plans (CAP) have been agreed with the factory managers and the relevant issues are planned to be resolved in line with auditor recommendations.

We recognise that audits should not be solely relied on, and we will continue to support our direct supplier and provide available assistance to monitor and encourage the improvement and rectification of non-conformances.

Table 5: Supplier evaluation tool

Transparency score (quantitative)

This score reflects the number of key issues titles responded to, drawn from 33 data points informed by our core policy expectations, the UNGPs and Modern Slavery Act guidance material.

Risk management and health score (qualitative)

This score is based on the quality of actions taken, measured on a three-point scale, against an issue title.

Supplier Sustainability Code of Practice (SSCoP) alignment (compliance)

This score is based on five issues titles assessed against SSCoP minimum criteria and assessment of 38 issues titles.



Table 6: Due diligence tools overview

Tool	Description	Use-case
Sustainable Procurement Risk Heat Map	Used by Transurban employees to map goods and services purchase categories against assigned risk levels.	Based on mapped risk level, prior to engaging a supplier, employees can seek advice on contract inclusions and other appropriate measures. High-risk categories are used to triage new suppliers or contracts for investigation – see further tools noted below.
Tender response schedules	Used during major procurement activities (for example, purchases above a specified contract value). 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 covering mitigating risks to people in operations and extended supply chains.	Evaluation team assesses tender response schedules against agreed criteria based on the applicable scope of engagement. Assessment feedback informs the awarding of tenders.
Supplier screening	Used to conduct financial, director, and company ultimate benefit ownership checks to identify known issues such as labour concerns, illegal behaviour, insolvency risks and other indicators that may lead to adverse human rights impacts.	Transurban's Procurement Operations Team reviews new suppliers against sanctions lists. As needed, and prior to contract award, Strategic Procurement Team's conduct independent financial and risks checks. Selected suppliers are also monitored via our digital monitoring subscription.
Supplier high-risk triage	Used to determine if new suppliers are providing high-risk goods or services, with high-risk procurement activities triaged to the Sustainable Procurement Manager for investigation.	Investigation may comprise a desktop review, or potentially seeking additional supplier-control information from the supplier, the contract manager or both. We may decide not to onboard suppliers with insufficient controls or, prior to onboarding, we may require suppliers commit to improvement or corrective actions within specified timeframes.
Enterprise supplier onboarding <i>New in FY24</i>	Used to survey suppliers (via a suite of questionnaires) prior to onboarding to gain early notification of potential risks. Questionnaires cover specific topics including labour and modern slavery and capture key information, capabilities, qualifications and risks. Completed surveys are managed digitally and are assessed by subject-matter experts for action as required. We are also re-qualifying existing suppliers for consistency in risk management actions.	Labour and Modern Slavery questionnaire enables the rapid triage of key risk profile indicators, such as migrant labour and visa holder visibility, and established policies and controls for identifying high-risk areas. Transurban may request further information, allocate a risk score, reject a supplier's onboarding application, or initiate supplier improvement expectations based on questionnaire responses.
Supplier evaluation tool	Used to assess suppliers' key modern slavery risk controls, including its own policies and processes and those applicable to its supply chains. This tool also captures granular information – such as supplier transparency and supplier risk mitigation score assessments – that supports improved future risk assessments.	Transurban's Procurement Team assesses tender submissions using this tool. This tool also serves as a guide and reference when we engage with suppliers on process enhancements and additional contractual requirements.
Contractual controls	Used to establish binding labour-related and modern slavery obligations for suppliers. For example, including requirements for reporting potential or actual cases to us, and requiring payments be passed on to contractors upstream in the supply chain (to reduce labour-related risks beyond Tier 1).	Transurban's Legal team reviews legal clauses for efficacy and enforceability. We also draw on external expertise to establish practical and best-practice contractual arrangements.
Credit card and purchase order reviews	Used to identify purchase orders and credit card spend in the high-risk categories identified in the Sustainable Procurement Risk Heat Map (described above). These reviews check, among other things, our spend with suppliers who have existing contracts, master services agreements and preferred panels.	Analysts share spend categories and supplier data with the Sustainable Procurement Manager for review. Learnings inform process improvements to better manage future transactions with specific suppliers or spend categories and to improve supplier requirements to better mitigate modern slavery risks.



Grievances and remedy

Access to remedy is a core component of the UNGPs. If we were to cause or contribute to adverse impacts, we would provide for, or cooperate in, remediation through legitimate processes. Where applicable, we would also seek to exercise leverage – including contractual or legal rights – to address any adverse human rights impacts or incidents in which we may be involved, including incidents relating to modern slavery.

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

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.

These guidelines are available to all employees via our intranet. We aim to improve and develop these further as we continue to learn about effective remediation.

Training and capacity building

Training is provided to the Transurban team members responsible for operating WestConnex. This training and awareness raising is designed to build capacity of these employees and supplier partners to understand how modern slavery may occur and flourish in our operations and supply chains, and how to identify and respond to modern slavery risks. Transurban employees involved in WestConnex operations, complete mandatory online training on our policies and positions on these issues. Training modules cover:

- **Ethical business practices and privacy** Our expectations related to giving and receiving gifts, benefits or entertainment; fraud, bribery and corruption; conflicts management; and how these topics relate to modern slavery; privacy and whistleblower policy and protections and support available to disclosers.

- **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.
- **Respect at work and sexual harassment** Workplace sexual harassment; and what to do if exposed to any form of 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; stories from people with lived experience; extended supply chain risks; policies; indicators; what actions to take to raise concerns or for help.

Training in the above topics is deployed to all eligible employees either annually or every two years. Training is supported by internal communications, intranet content (including relevant policy downloads) and websites. All training modules are also accessible as on-demand content.

During FY24, additional, detailed training workshops on modern slavery and key requirements under the Act were held for Transurban's Procurement Team members and key contract managers involved in the operation of WestConnex. Training was particularly linked to the refreshed enterprise onboarding process and Contract Management Framework.

We also continued to conduct and support key supplier and wider industry workshops, designed to build collective working knowledge of and capacity to address modern slavery risks. Collaborating and sharing insights with like-minded industry partners improves overall understanding. For more information, see Collaboration and industry engagement on page 16.

Enhancing two-way collaboration with suppliers

Our business partners and suppliers play a key role in the success of our organisation, working with us to deliver safe and convenient transport solutions to our customers and communities. We aim to continuously strengthen supplier relationships, raise awareness of key issues and work to encourage continuous improvement in delivering responsible business outcomes. We do this through:

Supplier Relationship Management (SRM)

This program-based approach to building supplier relationships to collaboratively drive value as part of a two-way relationship. A governance group structure is established, providing oversight of collaborative actions to maximise opportunities across the life of the relationship and includes opportunities to engage on human rights and modern slavery discussions. This program:

- fosters two-way dialogue on modern slavery, human rights and broader sustainability risks
- promotes sharing of best practice and lessons learned, driving continuous improvement
- provides opportunities to deepen understanding of supply chains and upstream risks.

Surveys

Suppliers are surveyed on critical information and supply chain risks that may affect our business or our stakeholders. Survey questions may cover labour, modern slavery and human rights risks. Supplier responses complement our ongoing due diligence and provide opportunities for future collaboration and engagement on surveyed issues.

Direct supplier engagement

We engage with targeted high-risk suppliers to drive awareness of modern slavery risks, transparent modern slavery risk reporting responsibilities and opportunities for positive community impacts. These engagements aim to understand suppliers' maturity beyond their public reporting, and to encourage proactive steps in modern slavery risk management. These interactions also help establish open dialogues on topics such as increasing Tier 2 suppliers visibility and upstream activities and preventing negative impacts to people.

Measuring effectiveness

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

Through STP's aligned approach with our operator Transurban, we continue to seek and receive feedback from Transurban employees, suppliers, investors, industry groups, external specialist consultants, academia and non-government organisations (NGOs).

We will continue evolving and maturing our processes to better measure the impact and effectiveness of our efforts.

Improvements introduced over the reporting period included expanding the capability and application of the Transurban supplier evaluation tool and expanding our collaboration, training and awareness-raising actions.



Table 7: Performance measures and effectiveness indicators

Workstream	Controls or action	Effectiveness Indicators
Governance	Policies and guidelines related to human rights	Regular reviews of policies and guidelines relating to modern slavery.
	External benchmarks	Global and national benchmark results, such as the Dow Jones Sustainability Index, specific modern slavery disclosures benchmarks and reports.
	Internal audit on controls	Auditing of processes and controls relating to assessing and addressing modern slavery. Completion of actions in response to audit findings.
	Internal governance	Convening of Transurban's Sustainable Procurement Business Leadership Group. Completion of meeting action items. Qualitative feedback from these leadership meetings on improvements in actions and their effectiveness. Adherence to Contract Management Framework and Policy
	Sustainable Procurement Program key performance indicators (KPIs)	Meeting annual key performance indicators related to continuous improvement in assessing and addressing modern slavery risks
	Integration of modern slavery considerations into sourcing practices managed directly by the Transurban 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 and types of issues investigated and remediated
	Supplier and Business Partners survey	Qualitative feedback to identify areas of focus where Transurban can enhance actions to collaborate with suppliers on mitigating modern slavery risks
	Supplier Relationship Management (SRM) program	Direct two-way consultation to identify areas of focus where we can collaborate with our suppliers to implement innovative actions to investigate and mitigate 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.

During FY24, WestConnex (via Transurban's representatives) participated in a broad range of industry initiatives to share knowledge and learn from others. We also undertook joint initiatives with industry groups to drive stronger and more coordinated outcomes across the community. We continue to engage with our industry peers to collectively act, share our knowledge where we can help others, and learn from peers and experts.

Collaboration and engagement activities we conducted during FY24 included:

- Participating in Australian Government's Modern Slavery Expert Advisory Group, led by the Attorney-General's Department (Transurban's Sustainable Procurement Manager has been an advisory group member since 2020)
- Participating in the UN Global Compact Network Australia, including participating in the network's Modern Slavery Community of Practice – Optimising Stream through Transurban. This 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
- Raising awareness on modern slavery to procurement and finance industry peers, presenting at the Faculty's IMPACT! Summit in 2023
- Participating as a panellist at the UN Global Compact Network Australia's 2024 Australian Dialogue on Business and Human Rights
- Engaging with small and medium enterprises in the road construction industries, National Roads Expo held in Sydney, hosting a panel discussion in collaboration with Anti-Slavery Australia and one of our suppliers to discuss risks to people within our communities
- Providing practical industry knowledge to PhD candidates to support academic development on modern slavery risks and responses and providing our time and experience to research projects at both Griffith and RMIT universities.
- Co-chairing the Infrastructure Sustainability Council's Modern Slavery Coalition (see case study opposite).

Case study: Collaborating with our industry on action

The Infrastructure Sustainability Council's (ISC) Modern Slavery Coalition was established in 2019, in response to the introduction of Australia's Modern Slavery Act. Transurban, as the operator of WestConnex, is an active member of this Coalition, that aims to accelerate the eradication of modern slavery from infrastructure's supply chains by shifting industry from a place of reactive compliance to one of transformational leadership.

During FY24, the ISC's Modern Slavery Coalition continued to work collaboratively to progress modern slavery-related capacity building and due diligence initiatives. These included:

- Convening a webinar for ISC members on modern slavery in the infrastructure sector which featured a presentation from the Office of the NSW Anti-slavery Commissioner about the NSW Government's expectations for suppliers to manage modern slavery risks, as well as information about broader modern slavery developments.
- Transurban and Ventia convening a session on modern slavery risks in the infrastructure sector at the IS Connect Conference.
- Exploring opportunities to strengthen members' approaches to supplier due diligence, including through discussing opportunities to uplift members' supplier questionnaires and streamline these across the industry, and managing responses to questionnaires.
- Facilitating an interactive information and Q&A session with a global PPE manufacturer at a Modern Slavery Coalition meeting, where they outlined their approach to modern slavery and broader labour rights work, including how they have addressed potential modern slavery concerns.
- Engaging with a major food and grocery company through a presentation at a Modern Slavery Coalition meeting to understand lessons learned from different sectors around addressing modern slavery, including in relation to supplier engagement.
- Providing regular updates to members on key global and local developments relating to modern slavery and broader human rights.



ISC Connect Conference, Modern Slavery in Infrastructure session – with speakers from Transurban and Ventia

¹ All external engagement initiatives are conducted in accordance with applicable laws and regulations, 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 STP. 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 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 Transurban's Sustainable Procurement Business Leadership Group for modern slavery risk management, which includes representatives from across a broad range of functions who have operating responsibilities across the Reporting Entities covered by this Statement and their owned or controlled entities.

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 Boards of Directors of STP (as the 'higher entity' for the Reporting Entities within each business group within the meaning of the Act):

- STP AT Pty Ltd, as trustee of the STP Asset Trust on 21 November 2024
- STP PT Pty Ltd, as trustee of the STP Project Trust on 21 November 2024



R A Finlay

Chair of STP AT Pty Limited and
STP PT Pty Limited



Appendix A

Reporting Entities

This Statement has been prepared as a joint statement on behalf of the following Reporting Entities:

- STP PT Pty Ltd (ACN 626 630 153) as trustee of the STP Project Trust
- WCX PHT Pty Ltd ACN 625 890 744 as trustee of WCX Project Hold Trust
- WCX PT Pty Ltd ACN 625 890 799 as trustee of WCX Project Trust
- WCX M4 PHT Pty Ltd ACN 614 741 374 as trustee of WCX M4 Project Hold Trust
- WCX M4 PMT Pty Ltd ACN 626 329 342 as trustee of WCX M4 Project Mezzanine Trust
- WCX M4 PT Pty Ltd ACN 614 741 436 as trustee of WCX M4 Project Trust
- WCX M4-M5 Link AHT Pty Limited ACN 624 153 751 as trustee of WCX M4-M5 Link Asset Hold Trust
- WCX M4-M5 Link AMT Pty Ltd ACN 626 329 333 as trustee of WCX M4-M5 Link Asset Mezzanine Trust
- WCX M4-M5 Link AT Pty Ltd ACN 624 153 742 as trustee of WCX M4-M5 Link Asset Trust
- WCX M5 PHT Pty Ltd ACN 608 763 088 as trustee of WCX M5 Project Hold Trust
- WCX M5 PMT Pty Ltd ACN 626 329 477 as trustee of WCX M5 Project Mezzanine Trust; and
- WCX M5 PT Pty Ltd ACN 608 798 465 as trustee of WCX M5 Project Trust

For further details on WestConnex roads managed by the Reporting Entities outlined above, together with all Transurban Group roads and projects, see the Transurban [FY24 Corporate Report](#).



Appendix B

Mandatory reporting criteria

Reference in this statement

Identify the reporting entity	<ul style="list-style-type: none"> • Contents – see page 2 • Appendix A – see page 18
Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"> • About us and our structure – see page 4 • Our structure – 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 8
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 10 • Collaboration and industry engagement – see page 16 • Grievances and remedy – see page 14
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"> • Measuring effectiveness – see page 15
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	<ul style="list-style-type: none"> • Consultation – see page 17 • Approval – see page 17
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 16

