



## Modern Slavery Statement

Financial year ending 30 June 2020

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## Introduction

All information and actions reported in this Statement are relevant to the reporting period 1 July 2019 - 30 June 2020 (Reporting Period).

## Criteria 1- Reporting Entities

This Modern Slavery Statement (this statement) is made on behalf of Tunnel Holdings Pty Ltd ACN 003 245 298 and its subsidiary Sydney Harbour Tunnel Co Ltd ACN 003 315 375 (each of which is referred to in this statement as the '**company**'), pursuant to the Modern Slavery Act (Cth) 2018.

This statement is in 3 parts.

### Part A - Governance

- a summary of the structure, operations and supply chains
- process of consultation
- details of the Modern Slavery policy approval by the Board

### Part B - Year in review

- operations and supply chain - a summary of risks of modern slavery practices in the operations and supply chain of the company

### Part C - Compliance

- future actions to be taken by the company to assess and address risks of modern slavery
- approval of this Modern Slavery Statement by the Board for the financial year ending 30<sup>th</sup> of June 2020.

## Part A - Governance

### Approval of statement by joint reporting entities

Tunnel Holdings Pty Ltd is a holding company and shares the same Board as Sydney Harbour Tunnel Co Ltd and therefore the approval of this Statement by the Board applies to both Tunnel Holdings Pty Ltd and Sydney Harbour Tunnel Co Ltd, thereafter referred to as the "**company**".

The company's approach to identifying and addressing modern slavery risks is set out in our Modern Slavery Policy and procedure and approved by the Board during the Reporting Period.

## Criteria 2 – Structure, Operations and Supply chain

The Sydney Harbour Tunnel Co Ltd is the subsidiary of Tunnel Holdings Pty Ltd and is the Lessee of the Sydney Harbour Tunnel. Established in 1987, Tunnel Holdings Pty Ltd is incorporated as a proprietary company in Australia. Tunnel Holdings Pty Ltd operates the Sydney Harbour Tunnel.

The company has policies of particular relevance, including a Modern Slavery Policy and Procedures, a Code of Conduct and a Whistleblower Policy which have been established to maintain integrity and confidence in the company and appropriately safeguard the reasonable expectations of our shareholders and stakeholders. All employees are responsible for knowing and following our policies and governance framework.

As a single asset operation, our workforce conduct a significant proportion of our operations and maintenance internally. We supplement these skills with specialist contractors and part suppliers, where required.

### Purpose and Position on Modern Slavery

A culture of honesty and integrity is encouraged by the company's leadership. The company acknowledges that modern slavery can occur in every industry, sector and that no sector is immune from its effects.

The company rejects any form of modern slavery. We expect our employees, partners and suppliers operate in accordance with all applicable laws, in particular those laws relating to the prohibition of human slavery including servitude, human trafficking, forced labour and marriage, child labour and debt bondage.

The company acknowledges that the impact of slavery is often linked to criminal activity that affects human rights such as corruption. The company aims to identify and manage any risks related to modern slavery in our business operations and monitoring our supply chain relationships.

## Part B – Year in review

### Criteria 3 - 4

During the Reporting Period the company:

1. Informed the company's Board about the Act and Modern Slavery risks.
2. Developed and implemented a Modern Slavery Policy and Procedure.
3. Provided employees with information on the company's Modern Slavery Policy and Procedures
4. Included Modern Slavery contractual provisions for potential high risk suppliers discussed below in the company's supplier contracts as part of the **Supplier Code of Conduct and Standards**.



## Due Diligence and Risk Management

The steps in our due diligence process included:

- establishing a register of suppliers;
- examination of operations and supply chain;
- educating employees in the new Modern Slavery obligations, and the importance of our plan to achieve compliance.

### Suppliers Risk Assessment

- Factors considered during this process included whether the entity was providing goods or services which were manufactured or supplied in Australia or overseas, any known reputational risks or adverse publicity in respect of particular suppliers;
- Our risk assessment identified 21 suppliers, including both products and services, with all suppliers being based in Australia.
- following the risk assessment, we selected the very small number of higher risk-rated suppliers for further research, ensuring these entities had current Modern Slavery Statements of a satisfactory standard. As no high risk suppliers had an agreement or contract with Sydney Harbour Tunnel, we determined that all new suppliers with a contract would be subject to our **Supplier Code of Conduct and Standards**; which were developed for this express purpose.
- Contractual assurance involves the inclusion of provisions in contracts under which the company is the recipient of goods, premises, products or services (supply contracts). Among other things, these provisions require suppliers to:
  - confirm that modern slavery practices do not exist in their own businesses;
  - confirm, to the best of their knowledge, that modern slavery practices do not exist in the businesses of their suppliers;
  - promptly disclose to the company the existence of any modern slavery practices in their business or supply chains.
- the company expects its suppliers will share this commitment and a desire to eliminate modern slavery practices from their respective businesses and supply chains.
- we consider this to be the commencement of an ongoing program of due diligence of our suppliers;
- we have also included in our supplier contracts, either new or when due for renewal, clauses outlining the requirement to comply with the Modern Slavery Act as part of our supplier governance framework.
- the provisions the company has inserted also permits the company to terminate the supply contract if the relevant supplier does not comply with the above requirements.

Following the due diligence process described above, and a sample of our suppliers, we did not identify in financial year 2020 any instances of Modern Slavery in our operations or supply chain.

## Part C - Compliance

### Criteria 5

#### Continuing Commitment - Internal audit

To ensure periodic assessment and review of the compliance framework set out in this policy, the Company will undertake an annual audit of compliance with the requirements of the Modern Slavery Policy and Procedures. The outcomes of the audit will be reported to the Board to ensure appropriate governance over Modern Slavery risks.

Given the Modern Slavery compliance framework was only established during the Reporting Period, conducting an audit on the framework in its infancy was not considered to be worthwhile. However, the audit process will be conducted in subsequent reporting periods.

In the financial year 2021/22, in light of current travel restrictions due to the Covid-19 pandemic, in-person audits may not be possible for some time, however we plan to follow up a supplier screening for any who may be in the higher risk category.

#### Future Actions

In the next reporting period, the company intends to:

- increase awareness of modern slavery risks and the company's approach to modern slavery by providing training to all employees;
  - this training will include ethics and compliance with our values, directives and processes, people management and communications skills to create a strong culture of tolerance of others;
- transparency in decision-making and mutual respect, that supports our position on modern slavery;
- continue our endeavours to embed contractual provisions in respect of modern slavery compliance in all new contracts with suppliers;
- use our best endeavours to oblige suppliers to act in accordance with the Act and our **Supplier Code of Conduct and Standards**;
- complete an audit of the company's modern slavery compliance framework and report those results to the Board.

## Criteria 6

### Human Resources & Consultation

If an employee becomes aware of, or suspects the existence of, modern slavery practices within a supplier's business or supply chains, the individual is required to promptly report this to their immediate manager and provide as much detail as possible in relation to their concerns. The company supports and encourages a "speak up" mentality and culture through our Whistleblower Policy and Procedures.

The risk of modern slavery occurring within the company's operations is very low given:

1. The expertise the company possesses (and applies in practice to its workforce) in relation to workplace, industrial relations and workplace health and safety regulation;
2. All new employees are required to provide 100 points of identification and evidence of their right to work in Australia before commencement of employment; and
3. The company has robust governance and compliance mechanisms in place that mitigate the risk of human rights abuses occurring.

## Criteria 7

### Whistleblower policy

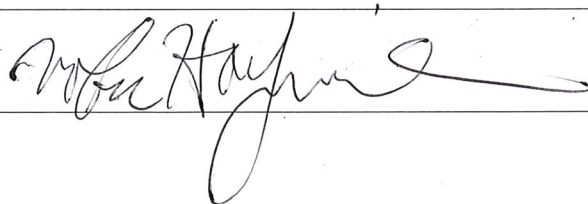
The company's Whistleblower Policy was introduced in December 2019. This includes support and counselling through our Employee Assistance Program at Acacia EAP. In addition we have engaged Your Call (an independent 3<sup>rd</sup> party) to provide assistance and support for any whistleblower.

No whistleblower reports were received during the financial year ended June 2020 in respect of Modern Slavery issues.

No reports have been received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified in our operations.

### Approval of Modern Slavery Statement

This Modern Slavery Statement was approved by the Board on 17 March 2021 and signed on its behalf by N.Hashizume in his capacity as Director.

N. Hashizume Director	
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