

Modern Slavery Statement FY25



Reporting Entities under the Modern Slavery Act 2018 (Cth) –

This Modern Slavery Statement (Statement) is published in accordance with the Modern Slavery Act 2018 (Cth) (Act). As was the case in the previous reporting periods, this is a joint statement by each of the Reporting Entities under the Act as listed in Appendix A (“Reporting Entities”).

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 the following 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”).

WestConnex (or “WestConnex Group”) is 100% owned by STP. Transurban’s wholly-owned subsidiary, Tollaust Pty Limited, has been appointed as the operator of WestConnex.

Consistent with previous years, during the reporting period the Transurban Sustainable Procurement Program (Program) was deployed to assist the WestConnex Group 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 ‘risk’ within this Statement refer to modern slavery risks to people as per the United Nations Guiding Principles on Business and Human Rights (UNGPs). For more information on Transurban’s corporate and sustainability risks and responses see the [Transurban FY25 Corporate Report](#).

About this report

Modern slavery involves the exploitation of humans, and we recognise that STP and our suppliers have a responsibility to respect human rights, including freedom from all forms of abuse that make up modern slavery.

Modern slavery can exist in any country or industry, and include some of the most extreme human rights abuses. It can be embedded into many global challenges including growing populations, climate change, technological development, global trade, geopolitical issues and conflict.

The most vulnerable people around the world continue to be at risk of situations that could lead to modern slavery, particularly migrants, women and children.

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 FY25, and acknowledges that our work in this regard is ongoing.

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.

We also acknowledge that our roads are used by people 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 assessing and addressing modern slavery risks as they relate to the WestConnex business during FY25 encompassed:

- **Improved due diligence and tracking.** For example, improving the evaluation tool used to monitor and assess suppliers controls to identify, assess and respond to modern slavery risks.
- **Third-party advice.** For example, engaging an expert third-party to carry-out two semi-announced audits of offshore supplier call centre sites
- **Updating policies and procedures.** For example our Supplier Sustainability Code of Practice and Human Rights Policy
- **In-house expertise.** For example, used in-house talent to develop and build a new bespoke e-learning module tailored to our operations and supply chains.

Program timeline

FY18 to 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
- 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 Statement (FY20).

FY22 to FY24

- With Transurban, piloted first responders training to identify and escalate potential or actual instances of modern slavery
- Embedded the use of a purpose-designed in-house supplier evaluation tool
- With industry peers, piloted a bitumen supply-chain study to deepen our understanding of modern slavery risks
- Our operator, fast-tracked our supplier engagement on modern slavery by bringing digital labour rights and modern slavery triage actions forward in the onboarding process
- Delivered tailored modern slavery training to our suppliers incident response and maintenance teams.

FY25 key actions

- Extended the detailed evaluation of suppliers to more than 37 suppliers within the past 24 months, covering more than 80% of FY25 total spend
- Engaged with the Australian Federal Anti-Slavery Commissioner, through input into the consultations on the strategic plan
- Social and labour audit training for the Transurban Procurement team was conducted, supporting professional development and understanding into how audits can detect instances or indicators of human rights issues (including modern slavery)
- Our operator, Transurban, engaged a third party to conduct social and labour audits on two international supplier call centre sites that support customer tolling services.

Our structure and operations

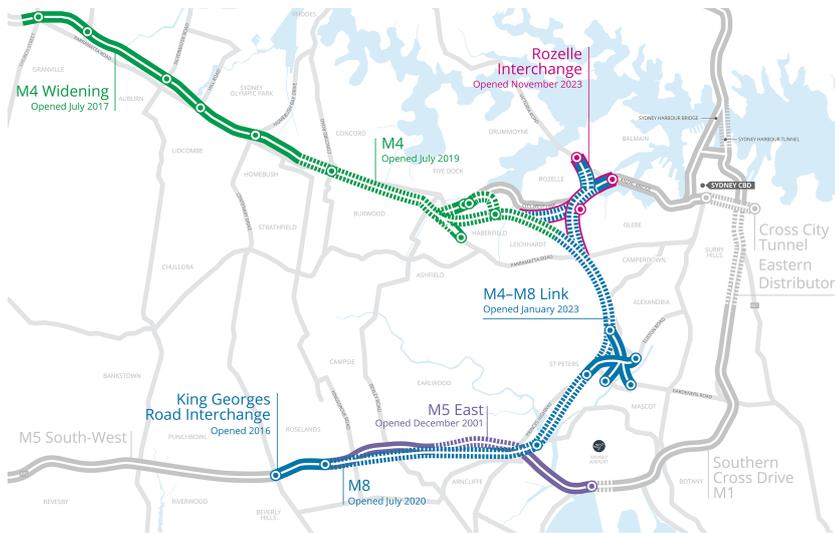


Figure 1 – Structure and operations overview (as at 30 June 2025)

Asset	Company	Ownership
M4	Transurban	50%
Rozelle Interchange		
M4-M8 Link	AustralianSuper	20.5%
M8		
M5 East	CPP Investments	10.5%
	La Caisse	10%
	Platinum Tawreed Investments	9%

Sydney Transport Partners

Sydney Transport Partners (STP) comprises the following 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.

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 rights. 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) oversees WestConnex's operations.

Traffic Control Room Operators (TCROs) monitor WestConnex roads 24/7, working closely with supplier 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 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 provides customer tolling services on WestConnex assets via its Linkt brand.

For more information on WestConnex visit westconnex.com.au or refer to [Transurban's 2025 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. Our customers interact with us and manage their toll payments via Transurban's retail brands. 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 emissions savings.

Our people

STP and WestConnex do not have employees, offices or operations. Transurban, via Tollaust is the appointed operator of WestConnex and conduct all activities associated in the operating of WestConnex assets.

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 ranging from large global and multinational organisations that provide critical technology, to Australian-based maintenance service providers and local and small business enterprises.

During FY25, more than 100 direct suppliers were used to provide goods or services supporting the operations and maintenance of WestConnex.

More than 99% 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: Australia 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 starting 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 **\$60m**
in annual managed spend

More than **100**
direct suppliers

More than **99.9%**
of spend with Australian suppliers

Direct suppliers located in
2 countries
Australia and the US

Our top FY25 supply chain categories (comprising more than 88% of our total spend) were:

Category	Activity	Suppliers	Typical activities
Customer and tolling services 29% of spend	Supporting our business and customers	<ul style="list-style-type: none"> Selected suppliers, consultants and technology providers 	<ul style="list-style-type: none"> Customer products and services that support our operations: sales platforms; customer relationship management; call centre services; billing systems; video tolling services; electronic tags.
Operations and maintenance 27% of spend	Maintaining road safety and operating standards in line with contractual requirements	<ul style="list-style-type: none"> 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; landscaping maintenance and incident response services. Suppliers may appoint subcontractors to deliver some activities.
Professional services and consulting 22% of spend	Delivering services to corporate management	<ul style="list-style-type: none"> 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 11% of spend	Providing banking systems	<ul style="list-style-type: none"> 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 chain

We use both direct and indirect labour services. Indirect labour services are used for activities such as:

- Road maintenance services: for example, landscaping, electrical and mechanical trades, incident response services, traffic management, civil maintenance and machinery operators
- road and infrastructure upgrades and maintenance: for example, truck drivers, asphalt paving, civil contractor services and labourers
- Skilled labour: for example, contingent workforce, professional services, technology and customer services, legal services, consultants and the skilled labour workforce used in our corporate supplier partners.

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

Some labour services may include casual or migrant workers, with labour sometimes delivered in shifts, such as overnight cleaners, weekend construction works; or provided 24/7 such as incident response services. Road maintenance works are also often delivered overnight where critical infrastructure within our tunnels can be inspected, maintained and repaired to minimise road-user disruptions.

Procurement management

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 9 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 have no direct supply chain exposure to modern slavery risks.



Modern slavery risks

As was the case in FY24, 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 all human rights risks, including modern slavery risks within our operations and our supply chains. The widespread nature of modern slavery, means people perpetrating or those impacted by modern slavery may potentially travel on our roads.

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

The UNGPs¹ establish a framework for businesses to guide the prevention of, and response to involvement in, human rights harm – including modern slavery (see Figure 2). Our risk-assessment processes are designed to align with this framework. This includes assessing how we could potentially cause, contribute to, or be directly linked to potential or actual instances modern slavery. Our risk identification and assessment processes also apply to STP owned or controlled entities.

Figure 2 – Continuum of involvement framework example

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

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 is updated at least annually, primarily via data provided by our operator (for example: country, industry and commodity data).

This assessment considers higher-risk activities that may exist deeper within our supply chains when we attribute risks, for example, risk associated with labour in the manufacturing of components, or labour used in the extraction of raw materials. 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:

- [2024 Trafficking in Persons Report – United States Department of State](#)
- [List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)
- [Global Slavery Index | Walk Free \(globalslaveryindex.org\)](#)

Risk assessment outputs

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

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

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 of where goods are made or services are performed, such as countries with no or low protection for workers, or a weak rule 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 FY25, 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.

Priority risk categories and assessment

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

Across all identified priority-risk categories, our FY25 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 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 chains, potentially leading to negative impacts on vulnerable people. If these circumstances occurred, any linked involvement could potentially be elevated to ‘contributing’ to negative impacts.

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

We also recognise that further categories of risk exist across our supply chains. We assess suppliers using Transurban's detailed supplier evaluation process and continue to track their actions and disclosures to assess and address modern slavery risks.

Together with Transurban as our operator, 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.

Figure 3 – Priority risk categories

Priority risk category and proximity	Vulnerability, prevalence and modern slavery inference
1. Tier 2 Supply chain: Onsite cleaning services	<p>Cleaning services is 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 cleaning services workers' vulnerability to modern slavery, labour and human rights abuses – for example, debt bondage, forced labour or coercive and exploitative situations. In FY25, our supplier evaluations continued to indicate both cleaning and general labour services are a recognised risk in our indirect supply chains.</p> <p>As the facilities and cleaning services are predominately engaged through Transurban, this work has also 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>
2. Tier 3+ Supply chain: Construction materials	<p>Our major projects 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>
3. Tier 2+ Supply chain: Labour	<p>As detailed throughout this statement, we recognise that vulnerable labour sources may be engaged in the provision of goods or services in Australia or offshore. Debt bondage, forced labour and coercion are the particular forms of modern slavery that could be prevalent in the labour supply chain.</p> <p>Especially vulnerable groups are migrant workers, women and children.</p> <p>Through Transurban's involvement, this topic is raised within our industry groups and with suppliers to collaborate on efforts to further reduce risks to people in our supply chains and across our industry.</p> <p>Modern slavery issues could occur domestically in construction, offshore in high-risk countries with prevalence of modern slavery, or in high-risk sectors such as call centres or steel making industries.</p>
4. Tier 2+ Supply chain: Technology and ICT equipment	<p>It is well documented that forced labour and other forms of modern slavery could be present in the development of technology components produced in large scale offshore factories, as well as the mining and processing of raw materials used to make them.</p> <p>We recognise that these issues can be difficult to tackle with the complexity, size and scale of the suppliers involved and the minimal leverage that we may have.</p> <p>Through Transurban's management of our supply chains, our multi-national technology suppliers are evaluated on how they assess and address modern slavery risks.¹</p>

¹ [Electronics is the highest value at-risk import for most G20 countries, worth estimated US243.6 billion. Global Slavery Index, walkfree.org/global-slavery-index/findings/importing-risk](https://www.walkfree.org/global-slavery-index/findings/importing-risk)

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

The STP Board has 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 STP Board and its committees.

The Transurban Procurement Team implements the Sustainable Procurement Program. This program determines the actions Transurban will take as our operator in assessing and addressing 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 consults and informs on the implementation of agreed actions that assess and address modern slavery risks and sustainable procurement activities, including those actions relating to WestConnex operations. This group comprises a cross functional team of Transurban's senior leaders, including those responsible for operating WestConnex.

During the reporting period the group continued to be informed on, and had input into key issues that shape our sustainable procurement actions including:

- Awareness of global events and issues that may impact our business, supply chains and potentially affected workers – such as the effects of conflict on supply chains
- Regulatory changes both domestically and internationally which may impact on sustainable procurement activities, including the appointment of the Australian Anti-Slavery Commissioner
- Internal policy enhancements, such as our Human Rights Policy and Supplier Sustainability Code of Practice
- Best practice and sustainable procurement activities which may inform our actions, including our approach to auditing suppliers operating in higher risk contexts such as our supplier call centres.

Policies and procedures

STP and WestConnex maintain a suite of policies and procedures which set 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 our 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 our 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 appropriate committee and Board. Relevant policies are listed and detailed in Figure 4.

Figure 4 – Relevant Transurban policies and procedures

	Policy or procedure	Scope and description
Public	<u>Human Rights Policy</u>	Describes how we aim to fulfil our human rights commitments, including reducing and responding to adverse human rights impacts (including modern slavery) and provides guidelines for actions on implementation.
	<u>Sustainability Policy</u>	Describes Transurban's sustainability approach across four pillars: people (including the safety of people in our operations and supply chains); planet; places and partnerships; and demonstrates how our approach supports the UN SDGs.
	<u>Supplier Sustainability Code of Practice (SSCoP)</u>	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.
	<u>Whistleblower Policy</u>	Explains how Transurban supports 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.
	<u>Anti-Bribery Corruption and Fraud Policy</u>	Outlines our approach to preventing, detecting, deterring and managing bribery, corruption and fraud risks. Applies to our employees, contingent workers, consultants and suppliers.
	<u>Conflicts Management Policy</u>	Details our approach to managing conflicts of interest; potential or actual conflict of interest declaration requirements; and appropriate response strategies. Applies to employees, contractors, consultants and suppliers.
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 12 for more information.
	Contract Management Framework and Policy	Provides a standardised contract management and administration approach. Provides guidance on responsible and sustainable procurement activities for people responsible for operating WestConnex.

All Transurban employees and any contingent managed workers whose roles include WestConnex operations duties have access to the Transurban intranet. Employees receive training on these policies and procedures, and they are freely accessible online (via the intranet)

Supply chain due diligence

Our due diligence approach is informed by international human rights standards including the ILO Declaration of Fundamental Rights at Work¹ and the OECD Guidelines for multi-national enterprises.

We track how our suppliers meet our policies and contractual requirements. We integrate our findings and 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.

Evaluating suppliers

We assess suppliers' governance, modern slavery risk mitigations and provision of mechanisms for raising concerns using Transurban's

Figure 5 Supplier evaluation methodology

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.

Supplier Evaluation Tool. During the reporting period, our operator, Transurban continued to expand the coverage of high-risk and priority-group WestConnex suppliers assessed using this tool (as described on page 15, FY23 STP Modern Slavery Statement).

During this reporting period, the Transurban team reviewed and enhanced the tools components - including the evaluation criterion and functionality.

During the year, 20 suppliers used for goods or services on WestConnex in FY25 were evaluated and 37 suppliers have been evaluated over the past 24 months representing over 83% of our FY25 spend. The Transurban team use these evaluations to 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 a structured framework to track suppliers' existing modern slavery policies and implementation progress, including 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 below in Figure 5.

¹ For more information, visit the [International Labour Organization's website](#)

Due diligence tools

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

Figure 6 – Due diligence tools overview

Tool	Description
Sustainable Procurement Risk Heat Map	<p>Used by Transurban employees to map goods and services purchase categories against assigned risk levels.</p> <p>Prior to engaging a supplier, Transurban employees can seek advice on contract inclusions and other appropriate measures.</p> <p>High-risk categories are used to triage new suppliers or contracts for investigation (see below).</p>
Tender response schedules	<p>Used during major procurement activities (for example, purchases above a specified contract value) where detailed response schedules are self-reported by supplier to demonstrate 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.</p> <p>Assessment of these schedules by an agreed evaluation team informs the awarding of tenders.</p>
Supplier screening	<p>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 in our supply chains.</p> <p>The Transurban Procurement Team engages third-parties to provide information and reviews suppliers against entity sanctions lists.</p> <p>Selected suppliers are continuously monitored using third-party risk screening tools and desktop assessments.</p>
Supplier high-risk triage	<p>Used to determine if new suppliers are providing high-risk goods or services, with high-risk procurement activities triaged to Transurban's Sustainable Procurement Manager. Further investigations may comprise a desktop review, or potentially seeking additional supplier-control information from the supplier, the Transurban contract manager or both. We may decide not to onboard suppliers with insufficient controls, or we may require suppliers commit to improvement or corrective actions within specified timeframes prior to onboarding.</p>
Enterprise supplier onboarding	<p>Self-assessment questionnaires used prior to onboarding provide early notification of potential risks and rapid-triage. Available questionnaires cover specific topics, (including labour and modern slavery) and capture key information, capabilities, qualifications and risks, including migrant labour use.</p> <p>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.</p> <p>Transurban may request further information, allocate a risk score, reject a supplier's onboarding application, or initiate supplier improvement expectations based on questionnaire responses.</p>
Supplier evaluation tool	<p>Used to assess suppliers' key modern slavery risk controls, including its own policies and processes and those applicable to its supply chains.</p> <p>This tool also captures granular information – such as supplier transparency and supplier risk mitigation score assessments – that supports assessment of tender submissions and onboarding, and is used to inform future programs of work targeting refined human rights risk areas.</p>
Contractual controls	<p>Used to establish binding labour-related and modern slavery obligations for suppliers. For example, requiring suppliers to report potential or actual cases to us, and passing payments to contractors upstream in the supply chain (to reduce labour-related risks beyond Tier 1).</p> <p>Transurban's Legal Team draw on external expertise to establish practical and best- practice contractual arrangements.</p>
Social and labour audits	<p>Social and labour audits are used to conduct site and time specific, evidence based due diligence to support in recognising indicators or actual instances of labour rights or human rights abuses.</p> <p>Suppliers operating in high-risk countries, sectors or that have been flagged as higher-risk are prioritised to undergo or provide evidence of audits completed by independent credible auditing bodies.</p> <p>Audits include detailed assessments of a supplier's compliance with applicable laws and International Labour Organisation standards, including identifying any indicators of child labour, forced or bonded labour and whether recruitment fees have been charged or confiscation of personal documents has occurred.</p>

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.

Through our operator, Transurban channels are provided for their employees, 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 Transurban employees via their 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 awareness raising, training and specialised capacity building is designed to better equip employees and our supplier partners to understand how modern slavery may occur in our operations and supply chains, and how to identify and respond to modern slavery risks. Transurban employees complete mandatory online training on policies and our 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 sexual harassment in the workplace.
- **Health, safety and environment (HSE) contractor management:** Our active client contractor management approach; how to implement contractor management assurance; employees' HSE role within our contract management framework.
- **Code of conduct:** Our mandatory behavioural standards and obligations.
- **Whistleblower policy:** Processes for raising concerns (including anonymously) including for situations of potential or actual instances of modern slavery.
- **Modern slavery:** Types of modern slavery; vulnerabilities; case studies of modern slavery in our identified high-risk categories; extended supply chain risks; policies; indicators; what actions to take to raise concerns or for help.

Mandatory training 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.

In addition, during FY25, training workshops on modern slavery, and key requirements under the Act were held for Transurban's Procurement Team members providing upskilling opportunities to understand the use, implementation and outcomes from social and labour audits.

The training session took the team through why audits are a good tool to support due diligence, how they are used and what insights and outcomes they can deliver to mitigate against risks to people.

The training connected broader human rights examples to the social and labour audit issues that are assessed and explained how audit findings are reviewed and corrective actions are implemented.

We 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 14.

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 review best practice and implement process enhancements to better measure our effectiveness.

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.

Figure 7 – Performance measures and effectiveness indicators

Workstream	Control or action	Effectiveness indicators
Governance	Policies and guidelines related to modern slavery and human rights	Periodic reviews of policies and guidelines.
	External benchmarks, assessments and research reports	Global and national benchmark results (e.g. Dow Jones Sustainability Index) academic research (e.g. A2J Lab's Human Rights Assessment of top Australian companies) and specific modern slavery disclosures benchmarks and reports.
	Internal audit on controls	Auditing processes and controls relating to assessing and addressing modern slavery. Completion of actions in response to audit findings.
	Internal governance groups	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 and engagement	Qualitative feedback to identify areas of focus where Transurban can enhance actions to collaborate with suppliers on mitigating modern slavery risks.

Collaboration and industry engagement

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

During FY25, WestConnex (via Transurban's representatives) participated in collaboration with industry and co-sectoral 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. FY25 collaboration and engagement activities included:

- Our operator, Transurban, co-chairing the ISC's Modern Slavery Coalition
- Participating in the 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. Our involvement includes: committing to the 10 principles; building our human rights and modern slavery knowledge; engaging with experts; sharing insights; and increasing supportive remediation networks.
- Providing input and insights to the Anti-Slavery Commissioner's Strategic Plan development and best practice guidance.

FY25 ISC Modern Slavery Coalition summary of activities

STP, through our operator Transurban, engages in the ISC to collaborate with our industry peers and to take a leadership approach within our sector to tackle modern slavery.

The Transurban representative is the Co-chair of this group along with recognised human rights experts from Pillar-Two.

ISC's Modern Slavery Coalition was established in 2019 in response to the introduction of Australia's *Modern Slavery Act 2018* (Cth). The Coalition aims to accelerate the eradication of modern slavery from infrastructure supply chains by shifting industry from a place of reactive compliance to one of transformational leadership.

During the reporting period, the ISC's Modern Slavery Coalition continued to work collaboratively to progress a series of modern slavery-related knowledge sharing, capacity building, and due diligence initiatives. These included:

- Progressing opportunities for the Modern Slavery Coalition to drive sector-wide collaboration and align due diligence approaches across the infrastructure sector, including through developing a template supplier self-assessment questionnaire with a common question set for optional use by ISC members.
- Undertaking a deep dive on labour hire in Australia's infrastructure sector to support members' understanding of possible modern slavery risks, as well as broader human rights risks, present in labour hire and subcontracting arrangements.
- Providing input into modern slavery-related questions for a draft supplier assessment questionnaire being developed by an overseas government for its suppliers.
- Discussing learnings from a supplier mapping project undertaken by a member organisation. This work considered the supply chains of bitumen and the prevalence and nature of modern slavery and considered how to manage risks.
- Discussing members' on-site worker checks to inform modern slavery due diligence efforts, including training, checking ID documents, and white card requirements.
- Sharing a member's experience undergoing an audit process focused on promoting safe and fair working conditions and responsible social and environmental management.
- Providing regular updates to members on key global and local developments relating to modern slavery and broader human rights.

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 the entities which are owned or controlled. These processes are aligned to Transurban's as noted in this statement. STP have communicated with relevant entities (including those owned or controlled) across the group to frame expectations, increase awareness, inform our disclosure in this Statement and strengthen our approach to addressing modern slavery risks. This has included seeking input from 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 (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 18 November 2025
- STP PT Pty Ltd, as trustee of the STP Project Trust on 18 November 2025



Trevor Gerber

Chair, STP AT Pty Limited and STP PT Pty Limited

Appendix A

Reporting Entities

This Modern Slavery 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 STP Project Trust
- STP AT Pty Ltd ACN 626 630 144 as trustee of STP Asset Trust
- WCX AHT Pty Ltd ACN 625 890 708 as trustee of WCX Asset Hold Trust
- WCX AT Pty Ltd ACN 625 890 753 as trustee of WCX Asset 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 AMT Pty Ltd ACN 626 329 191 as trustee of WCX M4 Asset Mezzanine Trust
- WCX M4 AHT Pty Ltd ACN 614 741 383 as trustee of WCX M4 Asset Hold Trust
- WCX M4 AT Pty Ltd ACN 614 741 445 as trustee of WCX M4 Asset 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 PMT Pty Ltd ACN 626 329 566 as trustee of WCX M4-M5 Link Project Mezzanine Trust
- WCX M4-M5 Link PHT Pty Ltd ACN 624 153 779 as trustee of WCX M4-M5 Link Project Hold Trust
- WCX M4-M5 Link PT Pty Ltd ACN 624 153 788 as trustee of WCX M4-M5 Link Project Trust
- WCX M5 AMT Pty Ltd ACN 626 329 253 as trustee of WCX M5 AMT Pty Ltd
- WCX M5 AHT Pty Ltd ACN 608 763 524 as trustee of WCX M5 Asset Hold Trust
- WCX M5 AT Pty Ltd ACN 608 798 081 as trustee of WCX M5 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
- WCX M5 PT Pty Ltd ACN 608 798 465 as trustee of WCX M5 Project Trust
- WCX M5 Finco Pty Ltd ACN 606 993 462; and
- WESTCONNEX Finance Company Pty Ltd ACN 626 812 039

For more information on WestConnex roads managed by the Reporting Entities outlined above, together with the Transurban Group roads, see the Transurban [FY25 Corporate Report](#)

Appendix B

Mandatory reporting criteria

Reference in this statement

	Section	Page
Identify the reporting entity	Reporting Entities under the Modern Slavery Act 2018 (Cth) Appendix A	2 18
Describe the reporting entity's structure, operations and supply chains	Our structure and operations Our supply chain	4 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	Modern slavery risks	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	Our approach Grievances and remedy Collaboration and industry engagement	10 14 16
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring effectiveness	15
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	Consultation Approval	17
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Collaboration and industry engagement	16

