



MODERN SLAVERY STATEMENT

2022



## CONTENTS

Modern Slavery	3
Introduction	4
About us	4
Overview of Corporate Governance	6
Our operations	7
Our people	8
Our policy framework	9
Our supply chains	11
Our risk management approach	12
Risk mitigation measures	14
External collaboration	17
Appendix 1 – Reporting Entities	18
Statement compliance index	19



### **Acknowledgement of Country**

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



### **Mihi**

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

# Modern Slavery

**The serious exploitation of people through threats, coercion or deception which undermines or deprives them of their freedom<sup>1</sup>.**



## **Any form of modern slavery is simply unacceptable**

At Ventia, we do not tolerate any form of modern slavery. Our business is both comprehensive and complex and we acknowledge that the risk of modern slavery is present across our supply chains and operations.

Our approach to preventing and responding to modern slavery is informed by our values and commitment to working with our supply chains and stakeholders to tackle human rights issues.

Since releasing our first Modern Slavery Statement in 2020 we have pursued continuous improvement, with the aim of proactively identifying and managing modern slavery and other human rights-related risks.

In 2022, Ventia did not directly identify any instances of modern slavery in our operations, however this outcome cannot rule out the presence of modern slavery in our broader supply chains.

We continue to focus our efforts on maintaining and improving our systems and processes to prevent any instance of modern slavery from occurring within our diverse Sectors and supply chains in the future.

A handwritten signature in white ink, appearing to be 'D Banks', written over a thin white horizontal line.

**Dean Banks**  
Managing Director and Group CEO  
Ventia

<sup>1</sup>. Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

# Introduction

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

This Modern Slavery Statement (**Statement**) has been made pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**). As part of this Statement Ventia reports on its actions to identify and address modern slavery risks associated with its operations and supply chains during the year ended 31 December 2022.

This is our third Statement under the Act. It was approved by the Ventia Board of Directors (**Board**) as the ultimate parent entity of the Ventia Group (**Group**) on 8th June 2023.

## Reporting entities

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

# About us

Ventia is an infrastructure services provider in Australia and New Zealand, specialising in the long-term operation, maintenance and management of critical public and private assets and infrastructure. Our strategy is to Redefine Service Excellence for our stakeholders by being client-focused, innovative and sustainable.

## Ventia at a glance



**35,000** +

Workforce  
(employees and subcontractors)



**400** +

Project sites



**40%** +

of our people work in  
regional and rural areas

## Our purpose & values

With the purpose of ‘making infrastructure work for our communities’ and a strategy to ‘redefine service excellence through our client focus, innovation and commitment to sustainability’ Ventia puts its people at the heart of its success.

Our value of collaboration, integrity, challenge and ingenuity, guide and define how we behave and what is most important to us as a company, with safety always our number one promise to ourselves, our clients and the communities in which we operate.

## Our services

Ventia operates across a broad range of industry segments, including but not limited to defence, social infrastructure, water, electricity and gas, resources and industrial, environmental services, telecommunications and transport.

We provide the following services	And serve a range of industries	
Asset Management	Commercial property	Maritime
Digital Solutions	Defence	Mining & Minerals
Engineering Services	Education	Oil & Gas
Environmental Services & Energy	Energy & Electricity	Rail
Facilities Management	Health	Road
Minor Capital Works	Industrial	Social Housing
Operation & Maintenance	Justice	Telecommunications
Property Services	Local Government	Water

## Our ownership structure

The creation of Ventia followed the merger of Leighton Contractors Services division, Thiess Services and Visionstream in 2015. These underlying businesses each have an operating history in Australia and New Zealand dating back more than 25 years. In July 2020 Ventia completed the purchase of the Broadspectrum group of companies in Australia and New Zealand, and Broadspectrum operations are now fully integrated into Ventia.

In November 2021, Ventia listed on the Australian Securities Exchange (ASX) under the code VNT and New Zealand's exchange (the NZX, as a foreign exempt issuer).



# Overview of Corporate Governance

At Ventia, we believe good governance is fundamental to achieving our purpose.

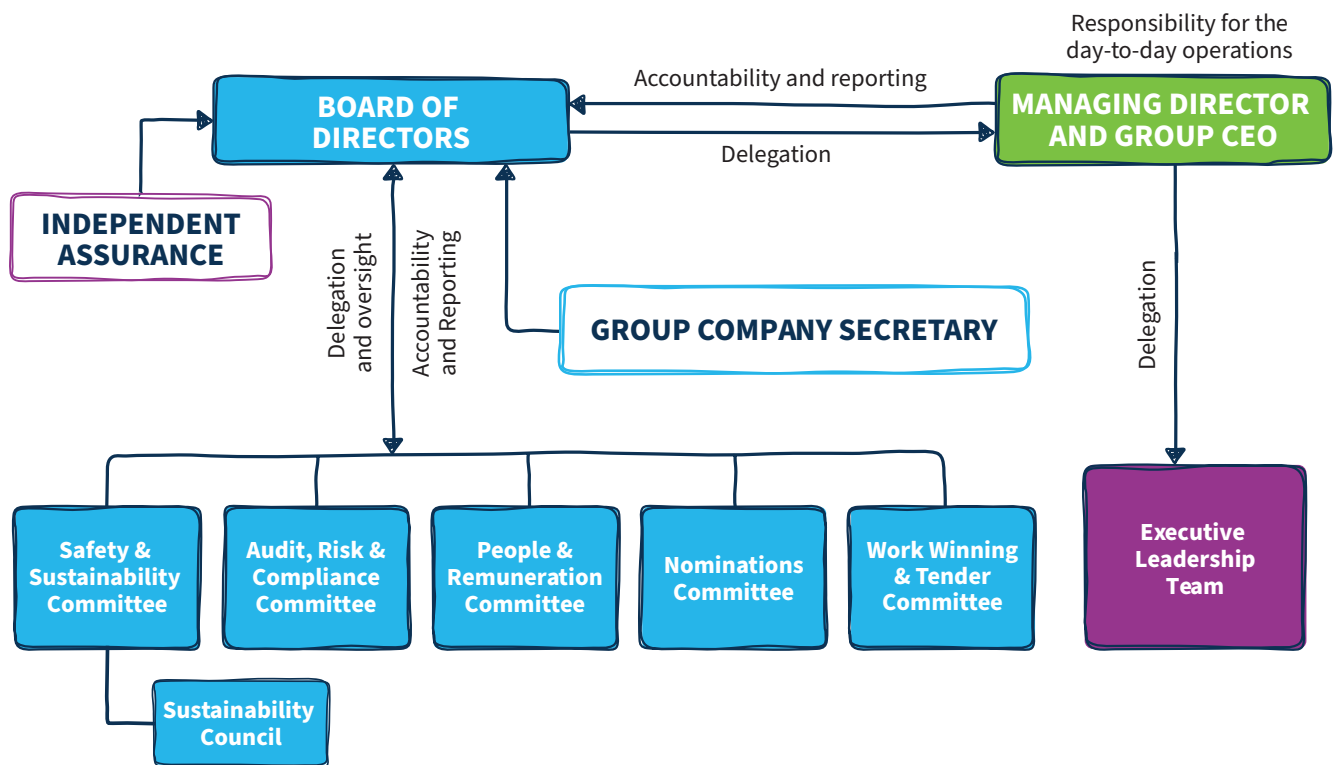
Our Board is responsible for the overall governance of the Group and its controlled entities. They set the “tone from the top” by demonstrating behaviours that are aligned with Ventia’s values and strategy. The diagram below illustrates Ventia’s Corporate Governance Framework. It shows the relationship between the Board, its Committees, the Managing Director and Group CEO, the Executive Leadership Team, and various independent assurance functions.

The Board has ultimate responsibility for overseeing Ventia’s response to modern slavery risks. The Board’s Audit, Risk and Compliance Committee oversees the review of emerging risks and the management of those risks, by applying risk management policies and processes to the relevant parts of our operations, underpinned by Ventia’s Risk Management Framework.

Established in 2021 by the Board, the Safety and Sustainability Committee oversees Ventia’s approach to managing modern slavery risk. Our Sustainability Council reports into the Safety and Sustainability Committee, and is comprised of representatives from across the business. It champions the implementation of our policies and strategy, including the implementation of activities relating to modern slavery risk in Ventia’s operations and supply chains. The Council is supported by working parties, including a dedicated Good Governance Working Party, which is focused on continuous improvement in Ventia’s approach to identifying and managing modern slavery risks.

For more information about Ventia’s Corporate Governance Framework, practices and policies please refer to Ventia’s 2022 Corporate Governance Statement.

## Our Governance Framework



# Our operations

Ventia operates across four Sectors: Defence and Social Infrastructure, Infrastructure Services, Telecommunications and Transport; each of which includes several business units, largely aligned with industry segments. Each Ventia Sector is supported by whole-of-Ventia group functions, including but not limited to Legal, Finance, Digital Services and People, safety & culture.

## Defence and Social Infrastructure

Defence and Social Infrastructure provides maintenance and support services to clients operating across defence, social infrastructure (education, health and state government), housing and community (justice and social housing), local government and critical infrastructure. Defence and Social Infrastructure also provides property and consulting services to public and private clients.

## Infrastructure Services

Infrastructure Services supports the operation and maintenance of utilities (water, electricity and gas), resources and industrial assets (mining, oil and gas, manufacturing) and resources development (minerals, oil and gas). Infrastructure Services also provides complex and large-scale environmental remediation and rehabilitation services, and leverages technologies aimed at enhancing client productivity and sustainability.

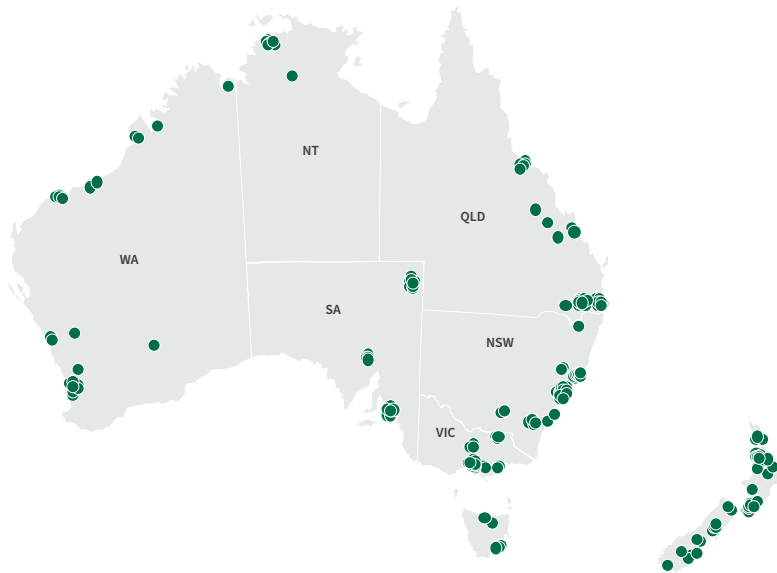
## Telecommunications

Telecommunications provides end-to-end service capabilities that span design, supply, construction, installation, commissioning and maintenance of telecommunications networks and infrastructure.

## Transport

Transport provides maintenance, project delivery and technology solutions to owners and operators of road, motorway, tunnel and rail networks.

In November 2022, Ventia Utility Services Pty Limited and Ventia Australia Pty Limited (controlled entities of Ventia) finalised an agreement to acquire certain assets from ATC Energy, an electrical transmission and distribution services provider headquartered in Victoria, and offer employment to certain employees of ATC Energy, to be part of our Infrastructure Services Sector. We also divested our MTC Broadband Joint Venture in New South Wales. Neither of these transactions had a material impact on our supply chains during 2022.



**Defence and Social Infrastructure**



**Infrastructure Services**



**Telecommunications**



**Transport**

# Our people



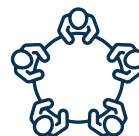
**15,687 employees in 2022<sup>1</sup>**



**13,984 employees in Australia**



**1,703 employees in New Zealand**



**67.7% employees covered by enterprise agreements**



**1,140 average number of employees under labour hire contracts**

Our people are employed across a range of industries and activities across our four Sectors in Australia and New Zealand. These are the only two countries in which we operate and both have a low prevalence of modern slavery (according to the Global Slavery Index) and strong regulatory environments. However, we acknowledge that some areas within our direct operations can carry a higher risk of modern slavery that we need to carefully understand and mitigate, in particular:

- the recruitment process, specifically in relation to workers hired through recruitment and labour hire agencies,
- workers who are on migrant visas,
- workers who have been engaged to work in low-skilled and/or lower paid roles, and
- workers living and working in remote locations.

In our total workforce of more than 35,000 people, 15,687 are directly employed by Ventia. The balance of our workforce are subcontractors, including labour hire personnel.

Most of our direct workforce (67.7%) is covered by industrial and enterprise agreements that set minimum wages and employment entitlements. The remainder of our employees have individual employment contracts above the minimum entitlements prescribed in National Employment Standards (in Australia) and Employee Minimum Rights (in New Zealand).

We regularly conduct audits to monitor compliance with relevant industrial instruments and employment contracts to ensure entitlements are being met. We undertake external audits of our payroll practices and should any under or overpayments be identified they are rectified immediately. We also ask our subcontractors to complete declarations regarding wage payment and compliance with industrial laws.

In 2022 we engaged an average of 1,140 workers via labour hire agreements. As noted, temporary work can carry higher risk of modern slavery. This is due to its transitory nature and engagement of migrant workers. All temporary work engagements are managed through a single platform, which provides good internal visibility and tracking of information, including hours worked.

People are at the heart of our success at Ventia and, as a large employer, we value and promote a positive culture of listening and receiving feedback from our employees, including through our “Have your Say” employee engagement survey. This survey was last conducted in 2022. Feedback received from the survey formed the basis of a detailed action plan, and progress against this plan is monitored by the Board and Executive Leadership team.

We have assessed the risk of modern slavery in our direct workforce as low. Our robust processes and procedures, including our Code of Conduct, support mitigation of the risk in our operations. We are aware that a greater risk exists in our supply chains, which comprises the significant focus of our risk assessment processes.



<sup>1</sup> Excluding temporary labour



# Our policy framework

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

## Ventia's Code of Conduct

Ventia's Code of Conduct (the Code) and values set out the standards of behaviour we expect of our Directors, employees, contractors, subcontractors and agents. It defines our commitment to good corporate governance, responsible business practice, to our clients and their customers, our workforce, the communities in which we operate and the environment. It provides the structure through which we maintain compliance with our legal obligations.

The Code also outlines where our people can go to for advice and to raise any concerns they may have that our conduct is not meeting the requirements of the Code. Any concerned person can also contact our independent Whistleblower line, details of which can be [found on our website](#).

The Board reviews the Code periodically to ensure it continues to address any emerging conduct issues. The Audit, Risk and Compliance Committee is provided with details of any material breaches of the Code.

## Employee training on the Code

Training on the Code is part of the induction process and is a mandatory annual training requirement for our Directors and employees. Approximately 93% of our full-time employees (equating to 11,562 employees) completed the annual training of our Code in 2022.

## Third-party suppliers to Ventia

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

## Modern Slavery Policy

The Board of Directors first approved the Ventia Modern Slavery Policy in 2020 and it was last updated in 2021. Ventia's Policy emphasises our commitment to implementing processes in our operations and supply chains that seek to mitigate the risk of any form of modern slavery including slavery, servitude, forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage from occurring.

We are also committed to working with our suppliers and contractors to eradicate modern slavery from our supply chains. In addition to complying with the Code, all suppliers and contractors are contractually required to comply with our Business Partners Standard and its associated due diligence process, and our International Trade Controls and Anti-money Laundering Policy.

Ventia's standard contract terms are also designed to address modern slavery risk throughout Ventia's supplier base and require suppliers to warrant that modern slavery risks in their business are assessed, investigated and that such risks are addressed through appropriate due diligence and remediation programs.

Once onboarded, Ventia's suppliers are also required to notify Ventia of any confirmed instances of modern slavery in their operations, provide a credible remediation plan and take relevant action within a timeframe set by Ventia. Upon request, suppliers are required to permit Ventia's personnel or our nominated representative to undertake verification activities to validate supplier compliance, which may include accessing the supplier's premises and records as required by Ventia.

Ventia's suppliers must commit to the inclusion of a similar and relevant clause in all contracts they may enter with any secondary subcontractors while under Ventia's operational control.

# OUR POLICY FRAMEWORK

## **Whistleblower Protection Policy**

Consistent with Ventia's commitment to maintaining a culture of integrity, the Board has adopted a Whistleblower Protection Policy, which encourages the reporting of suspected misconduct or any improper situation or circumstances in relation to Ventia. Examples of reportable conduct under the Whistleblower Protection Policy include (but are not limited to):

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

The Whistleblower Protection Policy explains how a report may be made and the protections a Whistleblower must receive.

The Audit, Risk and Compliance Committee is provided with details of any calls received under the Whistleblower Protection Policy, the outcomes of any investigations and actions taken because of any findings. A copy of this Policy can be found on our website.

## **Other relevant policies**

In addition to the above, we have various policies in place at Ventia to promote ethical and legal practices and behaviour in alignment with Ventia's values. These policies also are designed to protect the human rights of employees, contractors, business partners, suppliers, clients and the communities in which Ventia operates. These include the following:

- Disclosure Policy
- Securities Dealing Policy
- Bribery and Corruption Policy
- Bullying and Harassment Policy
- Diversity and Inclusion Policy
- Equal Employment Opportunity (EEO) and Discrimination Policy
- Fair Treatment Policy
- Health and Safety Policy
- Privacy Policy
- Procurement Policy
- Sustainability Policy
- Workplace Behaviour Policy

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

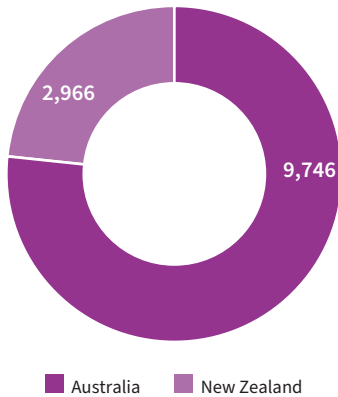
# Our supply chains

Ventia’s ongoing operations continued to use goods and services supplied primarily through approved suppliers to create systems, provide services and other solutions. For example, while the outcome or end product of a project may be a solution, Ventia will have only provided services in support of that outcome, such as the installation of products manufactured by our suppliers or those of our clients.<sup>1</sup>

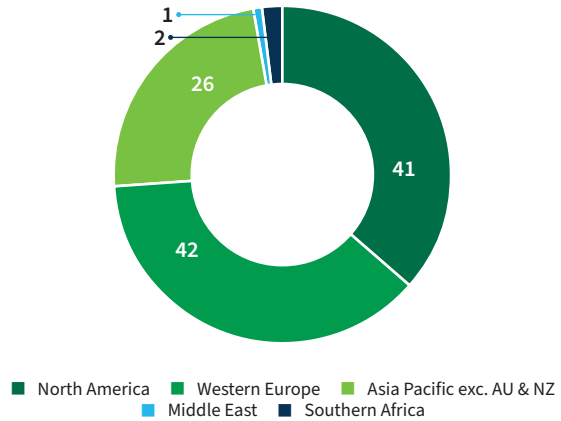
Ventia manage procurement through a Group, centre-led function, with local implementation. In 2022 our commitment to buy from local suppliers remained strong, and we continued to source more than 89% of all goods and services from our directly engaged suppliers in Australia for use within Australia. This commitment enables us to work closely with our suppliers and understand their operations and the partnerships within their supply chains.

## Ventia Suppliers by Region

Number of Ventia suppliers located in Australia and New Zealand

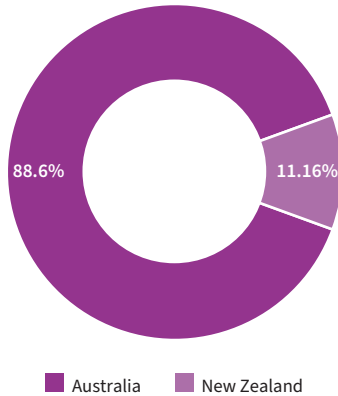


Number of suppliers located in other regions

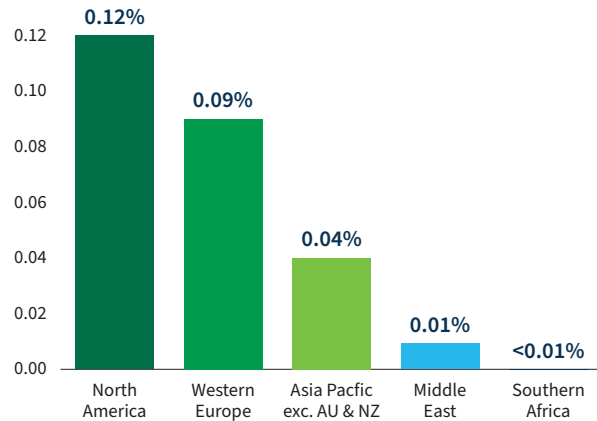


## Ventia Spend by Region

Spend in Australia and New Zealand



Spend in other regions approx 0.25%



Individual projects do procure goods and services directly to meet specific requirements and to manage geographical constraints as they arise. Ventia ensures that such procurement transactions adhere to our governance systems and procedures to comply with our Risk Management Framework, which was current throughout the 2022 reporting period.

Under our Infrastructure Services Sector we operate a manufacturing and servicing workshop located in Queensland focused on steel fabrication and heavy equipment building and servicing. At this location we design, manufacture, service and repair items such as drilling rigs and other specialised associated plant, transport frames, platforms, trailers and lifting gear. During 2022 we procured materials such as electrical and hydraulic equipment and ancillary components directly from Australian-based suppliers to service and build new machinery and equipment.

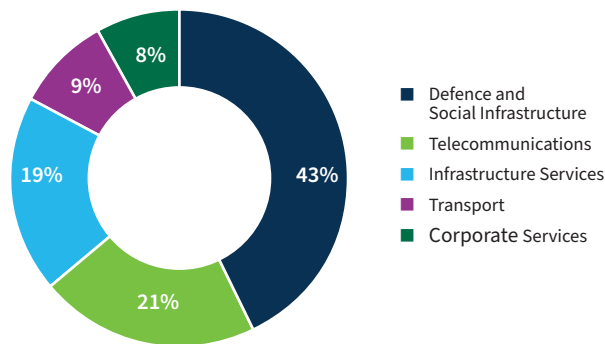
External services engaged in this process include professional support such as engineering verification, electrical and programming, as well as trade and fabrication support if required; with all of these service providers also based in Australia.

1. Within our Infrastructure Services sector some manufacturing is conducted in support of our Rig and Well Services business.



# OUR RISK MANAGEMENT APPROACH

## Supply chain spend across Ventia sectors



### Ventia's operational footprint

- Approximately 13,000 directly engaged suppliers (Tier 1) across Ventia.
- Close to 10,000 engaged within Australia and 3,000 in New Zealand.
- 112 suppliers located outside of these two regions.

# Our risk management approach

A robust modern slavery risk assessment process continued to be an integral part of Ventia's Risk Management Framework during 2022.

Suppliers are assessed for risk and alignment against our Code of Conduct and relevant policies through their responses to our Business Partners Declaration and due diligence process at onboarding and throughout the procurement lifecycle.

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

As part of our specific forced labour supply chain risk evaluation, directly engaged suppliers were assessed using our risk assessment tool. The tool incorporates international validators (outlined below) together with sector and industry, product and services, geographic and entity-focused risks, and additionally considers the commercial leverage that we have with our supply chain partners.

The process of remediation of identified instances of modern slavery in our supply chains is guided by our "Engaging Business Partners" process, starting with conducting an additional and targeted due diligence review, followed by a series of issues resolution steps, all the way to ceasing all dealings with the business partner in question should no alternative avenue be devised.

## International validators

As part of the assessment of modern slavery risk in our supply chains, we continued to utilise the Global Slavery Index (GSI) as the main pillar of our risk assessment in geographical terms. The GSI provides a measure of the prevalence of modern slavery by ranking countries, in terms of the number of victims of modern slavery. It also provides an analysis of the actions taken by governments to respond, and the factors that make people vulnerable to modern slavery.

We also utilise the United States Department of Labor 'List of Goods Produced by Child or Forced Labor', which provides a list of goods and their source countries for which it has reason to believe are being produced by child labour or forced labour in violation of international standards, as required under the United States Trafficking Victims Protection Reauthorization Act (TVPPRA). The List comprises 155 goods from 77 countries, as of September 30, 2020. Ventia continued to incorporate this data into the assessment of our international supply chains in 2022, not only based on country of operation but also focused on the type of goods procured.

## Geographic location of products and services

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

## Identification of risk

We assess risk in our supply chain based on geographical location and the type of procured goods or services as applicable. As a result, in 2022 we continued our category-based approach to supplier risk management, while taking into consideration our ability as a purchaser to instil greater action and transparency in our supply chains.

During 2022 we directly imported a very small proportion of our total product purchases from overseas suppliers. Most of these suppliers are based in OECD defined low-risk countries. However, it is our goal to continue to investigate our supply chains for modern slavery risks beyond Tier 1 supplier engagement.

The risk analysis performed for the year of 2022 across the Group found that human rights risks, including those linked to modern slavery, continued to be more prominent in the procurement of low-value transactions. For example, protective and high visibility clothing and the provision of cleaning services. These categories were a particular focus in the design of our 2022 supplier engagement approach.

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

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

Ventia's top three supplier spend categories in 2022 were:

1. Facilities management
2. Construction
3. Corporate services

Our modern slavery risk assessment over the 2022 reporting period was conducted to identify the risk of Ventia causing, contributing to or directly being linked to modern slavery practices in our supply chains. The following products and services were identified as potential areas of vulnerability in our operations:

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

Geographic location, the specific supply chain conditions, such as the nature of the workforce involved, and inherent commodity conditions are factors we use in our modern slavery risk assessment.

Suppliers identified in the above categories represented 6% of our total annual spend during 2022.

Based upon the location and services provided by these suppliers, the risk of modern slavery for these categories has been assessed as low to medium risk. A targeted group of these suppliers were identified during 2022 for further engagement.

## Outcome

We did not identify any instances of modern slavery related to Ventia's supply chains during the 2022 reporting period relevant to this Statement.

We identified 325 suppliers for further engagement regarding modern slavery risks in 2022 in line with our modern slavery risk management framework, spanning approximately AU\$190 million or 6% of the year's total spend. Ventia acknowledges that such an outcome does not discard the presence of modern slavery in our supply chains and we continue to refine our modern slavery risk identification and mitigation approach.

# Risk mitigation measures

During 2022 we continued to make progress on the implementation of policies and actions to assist our business and our supply chain partners to identify and respond to modern slavery risks in our operations and supply chains.

We have reviewed and updated our modern slavery due diligence process to ensure new suppliers answer our modern slavery due diligence questionnaire as part of our business onboarding process. The modern slavery questionnaire is supported by our broad business partners' due diligence process, for which all new suppliers must execute a general due diligence questionnaire. Additionally, suppliers with whom we spend more than AU\$1 million must complete a Business Partners' Declaration due diligence questionnaire, which also addresses the risk of modern slavery in their respective suppliers' operations.

We have started a trial in select areas of our operations to require all new suppliers to complete our sustainable procurement questionnaire covering environmental, economic and social sustainability aspects of the procurement process, including modern slavery risk disclosures and indicating the level of maturity suppliers may have in this space.

## Addressing Modern Slavery Risks in the PPE supply chain

At Ventia we understand that there is a heightened risk of modern slavery and human rights related risks in the supply chains of our suppliers who provide us with Personal Protective Equipment (PPE) and workwear. With a large volume of suppliers historically supplying these products across our business, in 2022 our Group Procurement team went out to tender with a specific aim to reduce the number of PPE and workwear suppliers that we engage and to provide Ventia with greater visibility and transparency in this higher risk supply area.

Our go-to-market strategy saw our Procurement Manager work closely with one of our modern slavery risk Subject Matter Experts to develop an enhanced set of tender questions with a specific focus on understanding our respondents' supply chains, systems and processes. This approach leveraged [tailored guidance produced by the UK Home Office](#), which included practical steps to be taken throughout the commercial lifecycle to identify and mitigate modern slavery risks in the PPE supply chain.

Ventia's PPE tender evaluation methodology provided for a higher weighting in ESG related questions. Higher scores were awarded to those respondents who provided comprehensive answers to the enhanced modern slavery and human rights related questions, who demonstrated strong related systems and processes, were open about the suppliers that they directly engaged with for the provision of the goods, and who were transparent about activities they were actively performing to manage these types of risks.

## Measurement of effectiveness

We are committed to measuring the effectiveness of our risk mitigation actions. During 2022 we continued to measure the effectiveness of our modern slavery response based on:

- Due diligence process outcomes
- Supply chain management and procurement
- People and Capability (P&C) – such as payroll audits conducted by both internal and external experts. Employment terms and conditions are constantly reviewed by our P&C department for compliance
- Reporting and management of data – integrity, accuracy and relevance
- Our grievance mechanism.

We assess the effectiveness of our due diligence process based on the number and quality of responses we receive from our business partners about how they assess and manage modern slavery risks.

Our supply chain management approach focuses on improving the visibility of risk, while managing our large supplier base. We improved the accuracy and completeness of our procurement data as this is key to ensuring our actions deliver improvement.

We have robust People and Capability systems, policies and processes to ensure that we internally manage modern slavery risks. Approximately 93% (11,562) of our full-time employees completed the annual Code of Conduct training in 2022, which includes a modern slavery awareness module. Our independent Whistleblower line continues to be our main grievance mechanism and a significant input into how we measure the effectiveness of our modern slavery risk mitigation actions.

We conduct a comprehensive annual modern slavery risk assessment to understand how Ventia can increase visibility of and manage the risk of modern slavery, which may occur in our business and supply chains. This includes a focus on supplier relations and trends identified through grievance mechanisms.



## Process of consultation

Consultation across Ventia took place during 2022, including all subsidiaries to ensure that modern slavery risks relating to these companies' operations are appropriately identified and managed.

The Board and each of the subsidiaries of Ventia set out in Appendix 1 have convened board meetings which involved discussion of the reporting requirements under the Act, information regarding the actions we intend to take to address these requirements, and were provided with a copy of this Statement. In addition, regular meetings were held with procurement personnel across all Sectors with modern slavery subject matter experts to ensure consistency in our approach and best practices are adopted.

Ventia has approved the Statement and delegated authority to the Managing Director and Group CEO to sign it.

As part of our continuous improvement approach to tackling modern slavery risks in our operations and supply chains, we continue to consult with a range of external stakeholders on an ongoing basis regarding our approach to the eradication of modern slavery including clients, potential clients, suppliers, other infrastructure services players in Australia, as well as government. This process is documented within our modern slavery management plan.

Our approach to identifying and tackling human rights risks, including modern slavery risk in our supply chains, relies on collaboration. We continued to be members and contributors of the Infrastructure Sustainability Council's (ISC) Modern Slavery Coalition, which focuses on accelerating the eradication of modern slavery in the infrastructure supply chain by shifting industry from a state of reactive compliance to proactive leadership.

Increased consultation with our suppliers has been implemented to assist in their understanding of modern slavery risks and ensure they understand our requirements. This increased engagement will be built upon each year to ensure all suppliers are kept up to date with any changes Ventia may require.



# RISK MITIGATION MEASURES

## Annual assessment plan progress

Role	Objectives	Measure of effectiveness	2022 progress
<b>As a purchaser of goods and services</b>	Improve the quality of the modern slavery self-assessment questionnaire.	Percentage of suppliers completing the self-assessment.	Modern slavery questionnaire digitised to improve access for suppliers and support analysis of responses. Response rate and quality of responses continues to improve.
	Increase participation with industry.	Report on participation with industry groups and forums to demonstrate our commitment to improvements in assessing risk in our supply chains.	Ventia contributed content to the 2022 modern slavery impact note published by the Infrastructure Sustainability Council, with the inclusion of Ventia's case study on the management of modern slavery risk in subcontracted cleaning services.
	Ongoing supply chains risk analysis.	Improve transparency of Tier 2 suppliers. Increase collaboration with suppliers identified with potential risk of modern slavery.	Supplier data reclassified to improve data accuracy and completeness.  Ongoing review of Ventia's processes to identify opportunities to improve transparency of Tier 2 suppliers, including collaboration with Modern Slavery Coalition on specific commodity risks such as bitumen and Personal Protective Equipment (PPE).
<b>As an employer</b>	Provide training.	Code of Conduct training is mandatory and includes our approach to modern slavery.	Approximately 93% of our employees (equating to 11,562 employees) completed the annual training of our Code in 2022, which includes a modern slavery awareness module.
	Increase awareness of modern slavery risk mitigation and grievance mechanisms.	Collate data to support training attendance and online resources for all employees.  Collect and report on data where grievance mechanisms is utilised.	Training on modern slavery issues and Ventia's Whistleblower Policy continued to be important focus areas as we continue to refine and improve our ESG processes. No reports of modern slavery issues were received in 2022. Consistent with previous years, Ventia instructed independent auditors with specific expertise in payroll compliance to review our high-risk payrolls. These audits in 2022 did not disclose any systemic issues of concern.
	Conduct independent audit of cleaning staff payroll compliance with modern awards.	Independent audit report highlights any issues of concern. Action plan implemented to address identified issues.	Covered in above audits.

# External collaboration

## Ventia's engagement with the Modern Slavery Coalition

During 2022, Ventia worked with the Infrastructure Sustainability Council to draft the Infrastructure Sustainability Impact Note on "Modern Slavery". The Impact Note outlines how infrastructure projects can drive practical action - through leadership and management, sustainable procurement, materials sourcing and workforce sustainability - to integrate an appropriate and effective modern slavery response with lasting impact.

Ventia contributed our own case study on the management of modern slavery risks in our cleaning business in 2020, to provide a practical perspective on the identification and response to modern slavery risk in the infrastructure sector. The published Impact Note can be accessed [here](#).

## Incident Response Training Pilot at Cross City Tunnel and the Eastern Distributor

As part of our sustainability collaboration, Ventia have provided extensive support to Transurban on the delivery of modern slavery training to equip Traffic Control Room Officers (TCRO) and Incident Response Crews (IRC) from both organisations to identify and respond to a potential human trafficking incident.

The training entailed the engagement of Australian leaders in the anti-slavery movement, Anti-Slavery Australia to raise awareness of how modern slavery incidents may manifest in the motorway setting, and to provide standard procedures for internal escalation and to report credible concerns to the authorities.

A training pilot was first conducted virtually in June 2021, with participation from relevant asset management teams from across both organisations. A face-to-face training session was then delivered in June 2022 at the Cross City operations depot with Ventia attendees from both the Cross City Tunnel and Eastern Distributor motorways. The training was well received by participants, who found the content relevant and useful to increase their knowledge and awareness of the signs of modern slavery.





# Appendix 1 – Reporting Entities

1. Ventia Services Group Ltd
2. Ventia Asset Infrastructure Services Pty Ltd
3. Ventia Utility Services Pty Ltd
4. Silcar Pty Ltd
5. Delron Cleaning Pty Ltd
6. Visionstream Australia Pty Ltd
7. Ventia Pty Ltd
8. Ventia Australia Pty Ltd
9. Easternwell Group Assets Pty Ltd
10. Easternwell Group Investments Pty Ltd
11. Easternwell Group Operations Pty Ltd
12. Easternwell Group Pty Ltd
13. Easternwell WA Pty Ltd
14. Piver Pty Ltd
15. ICD (Asia Pacific) Pty Ltd
16. Ventia Solutions Pty Ltd
17. Ventia Property Pty Ltd
18. Visionstream Pty Ltd
19. Trace Joint Venture
20. Ten Rivers Pty Ltd

# Statement compliance index

Australian Modern Slavery Act 2018	Ventia response	Statement Page	Detail
a. Identify the reporting entity.	<a href="#">Introduction</a>	Page 4	<ul style="list-style-type: none"> <li>Ventia Services Group identified as the main reporting entity.</li> </ul>
	<a href="#">Appendix 1 – Reporting Entities</a>	Page 18	<ul style="list-style-type: none"> <li>List of all reporting entities covered by the Statement.</li> </ul>
b. Describe the reporting entity's structure, operations and supply chains.	<a href="#">Our operations</a>	Page 7	<ul style="list-style-type: none"> <li>Ventia four sectors described.</li> <li>Ventia operational footprint infographic.</li> </ul>
	<a href="#">Our people</a>	Page 8	<ul style="list-style-type: none"> <li>Ventia's workforce including temporary labour</li> </ul>
	<a href="#">Our supply chains</a>	Page 11	<ul style="list-style-type: none"> <li>Suppliers located outside Australia and New Zealand infographic.</li> <li>Ventia spend by region infographic.</li> <li>Supply chain spend split across Ventia sectors infographic.</li> </ul>
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<a href="#">Our people</a>	Page 8	<ul style="list-style-type: none"> <li>Risk mitigation and monitoring in our operations</li> </ul>
	<a href="#">Our risk management approach</a>	Page 12	<ul style="list-style-type: none"> <li>Our risk management approach.</li> <li>International validators.</li> </ul>
	<a href="#">Identification of risk</a>	Page 13	<ul style="list-style-type: none"> <li>Geographic location of products and services.</li> <li>Identification of product and service risks.</li> </ul>
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	<a href="#">Risk mitigation measures</a>	Page 14	<ul style="list-style-type: none"> <li>Risk mitigation measures.</li> <li>Addressing Modern Slavery Risks in the PPE supply chain.</li> </ul>
	<a href="#">Annual assessment plan progress</a>	Page 16	<ul style="list-style-type: none"> <li>Annual assessment plan progress.</li> </ul>
e. Describe how the reporting entity assesses the effectiveness of these actions.	<a href="#">Measurement of effectiveness</a>	Page 14	<ul style="list-style-type: none"> <li>Measurement of effectiveness.</li> </ul>
f. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	<a href="#">Process of consultation</a>	Page 15	<ul style="list-style-type: none"> <li>Process of consultation.</li> </ul>
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	<a href="#">External collaboration</a>	Page 17	<ul style="list-style-type: none"> <li>Ventia's engagement with the Modern Slavery Coalition.</li> <li>Incident Response Training Pilot at Cross City Tunnel and Eastern Distributor.</li> </ul>

