



Modern Slavery Statement

1 July 2024 to 30 June 2025



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Busways’ respectfully acknowledges the Traditional Owners and Custodians of the lands on which we work across New South Wales and South Australia. We recognise their continuing connection to land, water and community and pay our respects to Elders past and present.

1.1 Reporting Entity

This Joint Modern Slavery Statement (Statement) is made pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (the Act). The Statement covers the reporting period from 1 July 2024 to 30 June 2025 and addresses the mandatory reporting criteria, as required by section 16 of the Act.

The entities covered by this Statement are:

- (a) Bhaajayu Pty Ltd (ACN 084 980 263)
- (b) Busways Australia Pty Ltd (ACN 643 586 225)
- (c) Busways Blacktown Pty Ltd (ACN 000 173 437)
- (d) Busways Camden Pty Ltd (ACN 003 081 230)
- (e) Busways Campbelltown Pty Ltd (ACN 000 572 145)
- (f) Busways Gosford Pty Ltd (ACN 055 471 782) as trustee for The Peninsula Trust
- (g) Busways North West Pty Ltd (ACN 643 586 770)
- (h) Busways Pacific Pty Ltd (ACN 106 202 340)
- (i) Busways South Australia Pty Ltd (ACN 613 309 185) as trustee for Busways South Australia Trust
- (j) Busways Wyong Pty Ltd (ACN 000 044 726)
- (k) Galbrock Pty Ltd (ACN 078 310 657) as trustee for BT Rowe Family Trust
- (l) Busways R1 Pty Limited (ACN 665 095 027)
- (m) Busways Group Pty Limited (ACN 114 855 551)
- (n) Busways OMR6 Pty Limited (ACN 668 470 004); and
- (o) The Busways Trust (ABN 97 156 294 345)

(When referring to all entities, they will be referred to as 'Busways Group').

Busways Group acknowledges it has a legal and ethical responsibility to promote transparency in operations and supply chains. Busways Group seeks to continually improve business processes that reduce the possibility of modern slavery practices occurring.

The entities forming part of Busways Group had an annual consolidated revenue of over \$100 million in the financial year from 1 July 2024 to 30 June 2025.

1.2 Structure, operations, and supply chains of the Busways Group

1.2.1 Structure

Busways Group is a wholly Australian owned operation. It is beneficially owned by members of the Rowe family, who are supported by a leadership team that manages service delivery, asset management, finance, human resources and other operational and administrative functions for all entities within Busways Group.

1.2.2 Operation

The core business activity of Busways Group is to provide and operate bus passenger transportation services.

Busways Group is currently contracted to deliver bus services for the New South Wales and South Australian state governments. Busways Group has over 1,350 buses operating in 14 contract regions and delivered services to over 47 million passengers in FY24-25. Busways Group employs over 2,800 people. The most significant proportion of our team members are bus drivers, followed by mechanics and business support functions.

1.2.3 Supply chains

As a wholly Australian owned business that provides services exclusively within Australia; all Busways Group employees are based in Australia.

Busways Group purchases goods and services from suppliers who are almost exclusively Australian based. Busways Group engages with suppliers for tyres, spare parts, fuel and lubricants, employee uniforms and other goods and services required to operate the business' bus fleet. For depot construction, refurbishment and maintenance projects, Busways Group engages external companies for materials and services.

1.3 Risks of modern slavery practices in the operations and supply chains; and any entities the business owns or controls

1.3.1 Risk in our operations

From a geographical perspective, Australia is located in a low-risk region. Given the strength of our legislation and the guidance in place, the risks of our operations being directly exposed to modern slavery continue to be low. However, Busways Group is aware that there may be indirect exposure to risks within our supply chain.

Busways Group has strong employee governance practices in place and complies with Australian workplace laws, including the Fair Work Act 2009 (Cth), National Employment Standards (NES), and workplace health and safety legislation. This level of governance provides the business with a high level of confidence that there are no modern slavery practices within operations directly under our control.

In accordance with various legislation and enterprise agreements currently in place, Busways Group regularly engages with the Transport Workers Union (TWU), the Rail, Tram and Bus Union (RTBU) and the Australian Manufacturing Workers' Union (AMWU) who act in their capacity to represent the interests of their members.

Furthermore, Busways Group seeks external legal advice from specialist employment lawyers and service providers to ensure we meet various legal and social obligations, and our employees receive the correct entitlements. Busways Group has a high level of confidence that we are not directly causing or contributing to modern slavery practices in our workforce.

We have assessed the risk of modern slavery involving our direct employees to be low. However, we recognise contracted or contingent workers, including those provided by third-party labour hire, may be more vulnerable to modern slavery risks. The greatest potential of this being workers who are lower-skilled, temporary, or migrant workers. Previously Busways Group completed the process of requesting Modern Slavery statements and or anti Modern Slavery commitments from identified third-party providers of cleaning services. We continue to monitor these service providers through our ongoing supplier evaluations (refer to section 1.4.4.2).

1.3.2 Supply chain risks

Busways Group recognises that while the majority of our suppliers are based in Australia, some of their products may be partly or wholly manufactured in other countries, including countries in Asia, North America, or Europe.

Based on the Commonwealth Modern Slavery Act 2018 guidance, we have identified a small number of high risk industries in our supply chain (refer to Table 1).

Table 1 High risk industries and corresponding risk profiles

	Geographical risk and industry sector risk	Industry sector risk
Industry	<ul style="list-style-type: none"> • Rubber products • Textiles and clothing (uniforms) • ICT and electronics 	<ul style="list-style-type: none"> • Cleaning services • Catering services • Construction services
Risk profile	<p>These industries have presented high geographic and industry risks according to the Modern Slavery Act. These industries often employ low-skilled workers while providing poor labour conditions. Modern Slavery practices can often be present in the production side of operation.</p> <p>In high-risk countries or regions, human rights have been poorly protected, and laws may be inadequately enforced. For instance, forced labour is an issue in many high-risk countries and regions where individuals are held in debt bondage. Furthermore, the potential for child labour exists in areas of high poverty.</p>	<p>These industries tend to employ unskilled and often vulnerable workers such as migrants, backpackers or refugees who may not be aware of their rights under Australian law. The work can often occur outside of regular business hours or workers do not receive the legal award rate of pay, superannuation, or leave entitlements. Workers may also be more susceptible to work-related injuries due to poor working conditions that are not adequately monitored for compliance to occupational health and safety standards and regulation.</p>

1.4 Actions by Busways Group to assess and address these risks, including due diligence and remediation processes

During the FY24-25 reporting period, Busways Group has continued the business' commitment to raising awareness and taking remedial actions to address high risks within our supply chain (refer to Table 2).

Table 2 High risk industries and risk remediation

	Geographical risk and industry sector risk	Industry sector risk
Industry	<ul style="list-style-type: none"> Rubber products Textiles clothing and footwear (uniforms) ICT and electronics 	<ul style="list-style-type: none"> Cleaning services Catering services Construction services
Remedial Action	<p>During the past year Busways Group has expanded and continued efforts to contact all of our direct suppliers to ascertain their approach to modern slavery risks. To date we have evaluated ~70% of purchasing suppliers and ~32% of all providers.</p> <p>It is important to note that ~75% of Busways currently active suppliers are small and medium enterprises (SME) who are not required to lodge a Modern Slavery Statement. The approach of these SMEs may be less mature and require greater levels of engagement to understand and develop.</p> <p>In addition, on 26th Feb 2025 an article was published in the Sydney Morning Herald that raised Modern Slavery concerns with 2 Battery Electric Bus suppliers, Foton Mobility Distribution (FMD), and VDI-Yutong. The article is included in full in the Appendix (refer to section 1.8). The concerns relate to parts used by these suppliers, particularly batteries made by CATL, being linked to forced labour in the Xinjiang region of China.</p> <p>Busways like other bus operators in NSW are required to select their fleet via a formal Procurement Panel run by Transport for NSW (TfNSW). TfNSW maintains this Panel as a list of approved bus manufacturers/suppliers whose vehicles meet TfNSW specifications. Buses are drawn from the Panel according to the specifications needed for the operator's region, service type and TfNSW's broader fleet strategy. In practical terms this means that operators must purchase fleet from an approved supplier under the Panel; or TfNSW chooses to own the fleet (or nominate acquisition) and the operator leases them; or the operator may be required to procure buses on behalf of TfNSW but still using the Panel framework. This system helps ensure consistency of fleet standards across all operators and enables buses to be reassigned between operators or across regions.</p> <p>Busways also operates services in Adelaide, however in South Australia fleet procurement is also controlled by the State Government (via a central government-procurement model rather than a Panel arrangement). The government retains ownership of the fleet and operators run services and maintain the buses.</p> <p>Following the Sydney Morning Herald article, the NSW Anti-Slavery Commissioner undertook a review of the NSW state government's procurement of electric buses under TfNSW and a formal (first) report was tabled to the NSW Parliament in May 2025. Since then media reporting confirms that the Commissioner is actively monitoring NSW procurement of electric buses and the investigation is ongoing.</p>	

Further due diligence actions taken during the reporting period are as follows:

1.4.1 Anti-Modern Slavery internal governance structure

For FY24-25, the governance responsibilities associated with the Modern Slavery Act 2018 and related internal policies for Busways Group were with the ESG Steering Committee (ESG SteerCo). This committee operates according to a charter of operation that includes business governance for anti-modern slavery policies and compliance activities. The ESG SteerCo membership consists of key leadership team members, including the Chief Executive Officer, Chief Financial Officer, and Head of Assets and Safety. The ESG SteerCo is chaired by the Sustainability Manager. Busways' Sustainability Manager collaborates with key stakeholders representing Finance, Information Technology, Human Resources, Business Risk and Compliance, Procurement, and Asset Management, in relation to governance matters.

Busways Group understands combatting modern slavery is an ongoing process. The business will continue to evolve ESG governance practices that strengthen our response to and resolve against modern slavery risk potentiality within our operations and supply chain.

1.4.2 Modern Slavery awareness and education

As implemented in previous reporting periods, Busways Group continues to provide Modern Slavery awareness training to team members across the business. This training provides guidance that enables key team members to:

- Recognise common forms of exploitation identified in the Modern Slavery Act 2018
- Understand the facts and impacts of modern slavery both in Australia and worldwide
- Understand the types of services and products consumed each day that are at most risk of modern slavery practices occurring
- Identify the warning signs of modern slavery activities
- Understand the high risk industries that Busways Group works with, both in operations and our supply chain
- Increase clarity on actions to take when modern slavery activities are suspected
- Be familiar with high-level requirements and obligations pertaining to the Modern Slavery Act 2018

For the FY24-25 reporting period 95% of enrolled team members have completed this training.

1.4.3 Anti-Modern Slavery Policy

In order to support the Modern Slavery awareness strategy at Busways, the previous Modern Slavery Policy has been renamed as, Anti-Modern Slavery Policy. In the FY24-25 reporting period the policy was comprehensively reviewed and reissued to remove duplication and improve clarity surrounding commitments and internal governance frameworks.

1.4.4 A continual improvement approach to mitigate potential risks within our operation and supply chains

During the reporting period, the ESG SteerCo, Contracts Team, Procurement team and Sustainability Manager continued to engage with key stakeholders within and external to the organisation (refer to Table 2).

Busways Group acknowledges that this is an ongoing and collaborative process, to which we are wholly committed. Busways Group utilises a continual improvement approach in strengthening

policies and building risk mitigation practices. This approach will ensure we collaborate with more people and entities within our sphere of influence over time so that we continually eliminate exposure to modern slavery risks and practices within our business and the communities in which we operate.

1.4.4.1 Incorporate anti-modern slavery into our procurement policies and procedures

To raise awareness and create collaboration with companies in our supply chain, Busways Group has incorporated prevention of modern slavery principles into our procurement related processes. In previous reporting periods we strengthened our supplier onboarding process and introduced changes to ensure supplier agreements contain obligations to comply with the Modern Slavery Act. In the FY24-25 reporting period our standards and expectations in relation to eliminating modern slavery from our supply chain have been clearly articulated and we continue to seek out further improvement actions that can be introduced in future.

Following internal audit recommendations, Busways current process is to annually evaluate our top 20 suppliers (in terms of order value and frequency); and in addition evaluate a random selection of smaller (value and frequency) suppliers. Busways Sustainability Manager continues to work with Procurement and Compliance teams to ensure anti-modern slavery clauses are included wherever appropriate in Busways Group policies and other documentation.

1.4.4.2 Biennial Supplier Confirmation

Busways Group conducts a re-assurance process for all active suppliers every 2 years. This requires all active suppliers to complete the supplier registration form, and to confirm their approach to identifying Modern Slavery risks and further seeks to understand how they manage their supply chain risks.

Going forward, if suppliers wish to work with Busways Group, they will need to confirm their modern slavery status and practices on a biennial basis. Where supplier's awareness of modern slavery risks is less mature, we will endeavour to work with them to evolve and improve their practices.

1.5 How Busways Group assesses the effectiveness of these actions

Busways Group employs payroll specialists to ensure that all employees are paid at the correct rate of pay and our payroll operations are also audited at appropriate intervals.

The Human Resources Compliance team, plan and conduct internal audits across all Busways Group functions in a rolling three year cycle. Led by the Human Resources Projects team, Busways Group conduct an annual review (and where required) update of all policies, procedures, manuals, guides and management plans across all functional areas of the business.

To ensure identified risks are properly managed and mitigation actions are correctly evaluated, Busways Group employs an annual roadmap exercise for strategic priorities, that includes rolling 2 year project plans across all functional areas of the business. This annual process incorporates analysis of the effectiveness of previous plans and actions to inform and guide the next set of priorities and plans. These roadmaps are monitored and evaluated by the Busways Group Leadership team.

1.6 Process of consultation within Busways Group

All the entities in Busways Group are family owned. For consultation purposes, Busways Group reporting entities have common directorships. One entity of the Busways Group, Galbrock Pty Ltd, is a sole directorship.

This Statement has been reviewed and approved by the directors of Busways Group entities. The development of this Statement was completed and reviewed by senior and executive members of the Busways Group leadership team.

1.7 Further actions

Busways Group is committed to continue working to combat modern slavery risks or practices in our operations and supply chain. Actions anticipated for the year ahead include:

- Further review and development of our supplier code of conduct incorporating stakeholder feedback.
- Analysis of the current supplier data accumulated through our re-assurance process for all active suppliers and determining if any changes to risk profiles and processes are warranted and/or if any further investigations are necessary.
- Identifying avenues to better collaborate with our smaller size suppliers to help them understand and improve their management and mitigation of modern slavery risks.
- Continue to educate our team members about modern slavery through internal communication messaging campaigns and the ongoing inclusion of our modern slavery awareness training program in the new employee on-boarding process.
- Endeavouring to work closely with our state government clients in their efforts to combat the risks of modern slavery in their supply chains.

At Busways, we are committed to the ongoing efforts required to eradicate modern slavery in all its forms, within our operations and supply chain. This statement is made in accordance with the Modern Slavery Act 2018 (Cth) and has been reviewed, approved, and endorsed by the board members of each of the reporting entities.

A handwritten signature in black ink, appearing to read 'Byron Rowe', written in a cursive style.

Byron Rowe, Director

Date: 19/12/2025

1.8 Appendix

Sydney Morning Herald article published 26th Feb 2025.

Slavery concerns over NSW electric bus imports

The Anti-Slavery Commissioner has been asked to investigate concerns that new electric buses commissioned by the Minns government have a “high risk” of links to forced labour.



[Madeleine Bower](#)

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3 min read

February 26, 2025 - 5:00AM

Concerns that new electric buses commissioned by the Minns government have a “high risk” of links to slavery and child labour, have led to calls for the Anti-Slavery Commissioner to investigate.

The NSW opposition has said there are grave concerns that Transport for NSW failed in its “due diligence” to assess the risks of modern slavery prior to approving two electric bus suppliers Foton Mobility Distribution (FMD) and VDI-Yutong in March last year.

Shadow treasurer Damien Tudehope wrote to the NSW Anti-Slavery Commissioner on Monday requesting an investigation into the procurement of the Chinese-made bus parts.

He wrote that an investigation was needed to “ensure that the NSW government does not purchase electric buses from companies with a high risk that forced labour is used in any part of their supply chain”.

This comes after [The Daily Telegraph revealed earlier this month](#) that both companies were importing “Ikea-style” flatpack buses from China that would be bolted together by local workers, despite government promises the buses would be manufactured locally.

With the electric buses essentially coming from China, concerns have arisen over the use of Chinese Communist Party-linked battery company, Contemporary Amperex Technology Limited (CATL), which is supplying the EV batteries for both FMD and VDI-Yutong.

Of the 319 new electric buses the NSW government announced it would deliver by 2028, nearly 200 of those will contain CATL batteries.

Multiple reports have flagged concerns around the batteries, with US senator Marco Rubio demanding the Department of Homeland Security blacklist the company in June last year, pointing to concerns that the company's supply chains "were deeply connected to forced labour and the ongoing genocide of Uyghurs in China".

Additionally a report into global supply chains by independent Swedish researcher Globalworks in June 2023 found that CATL was heavily connected with lithium and nickel suppliers known for their use of forced labour. This includes state-owned Chinese paramilitary organisation Xinjiang Production and Construction Corps, which is sanctioned by the US for alleged human rights abuses relating to the oppression of the Uyghur population and the running of internment camps.

Additionally the report found that CATL has links to multiple cobalt mines in the Democratic Republic of Congo, where risk of forced labour, including child labour is "very high".

In a statement released at the time CATL said accusations around connections to forced labour were "groundless and completely false".

While both FMD and VDI-Yutong are technically Australian owned, they both have close ties to major Chinese bus manufacturers.

Transport for NSW has indicated it has no plans to investigate the supply chains of either company, saying it is for suppliers to ensure slavery is not occurring in their supply chains.

"All suppliers appointed to deliver these buses are required to undergo an independent financial assessment and comply with the applicable provisions of the Modern Slavery Act 2018," the spokesperson said.

"Suppliers are required to take reasonable steps to make sure that Modern Slavery is not occurring in the supply chain through a formal deed of standing offer."

The spokesperson said TfNSW will review the provisions in the deed, with the view to strengthening the protections against modern slavery.

Australian Manufacturing Workers Union secretary Bradley Pidgeon backed calls for an investigation into the two companies, saying the Minns

government needed to ensure all bus components were not connected to forced labour.

“We would have concerns if our members are exposed to batteries that are problematic,” he said.

“We don’t support any procurement of any company that has breached modern slavery provisions.”

Strategic Analysis Australia director Peter Jennings agreed an investigation was needed and that the government should be focusing on procuring from Australian companies.

“Businesses and governments know that there are problems with Chinese-sourced materials but usually they look the other way because they are cheaper,” he said.

“Forced labour and modern slavery is relevant to a great many Chinese industries – including ones that export to Australia.”

Both VDI-Yutong and Foton Mobility Distribution were contacted for comment.