



# 2023

## Modern Slavery Statement



# Modern Slavery

**Modern slavery is a term that describes serious situations of exploitation where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.**



According to the United Nations and the Walk Free Foundation there were an estimated 50 million victims of modern slavery around the world in 2021<sup>1</sup>.

While modern slavery does not encompass practices like substandard working conditions or underpayment of workers, these practices are illegal and harmful, and may also be present in some situations of modern slavery or escalate into modern slavery if not addressed<sup>2</sup>.

At Ventia we believe any form of modern slavery is simply unacceptable. We acknowledge the risk that modern slavery is present in the regions where we operate and procure good and services.

Our approach to preventing and responding to modern slavery is informed by our values.

Since releasing our first Modern Slavery Statement in 2020, we have pursued an evidence-based approach to improving our understanding of modern slavery as we work continuously with our business partners and stakeholders to mitigate it and other human rights-related risks in our supply chains and operations.



**Dean Banks**  
Managing Director  
and Group CEO

<sup>1</sup> <https://www.walkfree.org/global-slavery-index/>

<sup>2</sup> Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, May 2023



## Acknowledgement of Country

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



## 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.

# Introduction

Ventia Services Group Limited ABN 53 603 253 541 (Ventia) is an Australian public company listed on the ASX and 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) (**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 2023.

This is our fourth 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 5 June 2024.

## 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 (collectively referred to in the Statement as **Ventia, we/our**).

## About us

Ventia is an infrastructure services provider operating in Australia and New Zealand, specialising in the long-term operation, maintenance and management of critical public and private assets and infrastructure.

Our purpose is to make infrastructure work for our communities. Our values of collaboration, integrity, challenge and ingenuity guide how we work.

## Contents

|   |           |
|---|-----------|
| <b>Introduction</b>   | <b>1</b>  |
| <b>Reporting entities</b>                                     | <b>1</b>  |
| <b>About us</b>   | <b>1</b>  |
| <b>Our operations</b>   | <b>2</b>  |
| <b>Our people</b>   | <b>3</b>  |
| Employee Relations  | 4         |
| <b>Corporate governance</b>                                   | <b>5</b>  |
| <b>Policy framework</b>                                       | <b>6</b>  |
| Employee training on the Code                                 | 6         |
| Third-party compliance  | 6         |
| Whistleblower protection policy                               | 7         |
| Other relevant policies and standards                         | 7         |
| <b>Our supply chains</b>                                      | <b>8</b>  |
| <b>Our risk management approach</b>                           | <b>10</b> |
| International validators                                      | 10        |
| Geographic location of origin for product and services        | 11        |
| Identification of product and service risks                   | 11        |
| <b>Risk mitigation measures</b>                               | <b>12</b> |
| Due diligence outcomes  | 12        |
| Outcome   | 12        |
| Measurement of effectiveness                                  | 12        |
| Consultation process  | 13        |
| Annual assessment plan progress                               | 13        |
| <b>External collaboration</b>                                 | <b>15</b> |
| Case study: Mapping the bitumen supply chain                  | 15        |
| Case study: Collaborating to build capacity with our partners | 15        |
| <b>Appendix 1 – Reporting entities</b>                        | <b>16</b> |
| <b>Statement compliance</b>                                   | <b>17</b> |

# Our operations

Ventia is structured across four sectors: Defence and Social Infrastructure, Infrastructure Services, Telecommunications and Transport; each comprising several business units, largely aligned with the industry segments we serve. Each Ventia sector is supported by Group functions, including but not limited to Legal, Finance, Supply Chain, Digital Services, Strategy and Corporate Affairs, and People and Capability.

## Our business is structured across four key sectors:



### Defence and Social Infrastructure

Defence / Social Infrastructure / Critical Infrastructure / Local Government / Housing and Community / Energy Solutions



### Infrastructure Services

Resources / Industrial and Environmental Services / Energy, Water and Renewables / Rig and Well Services



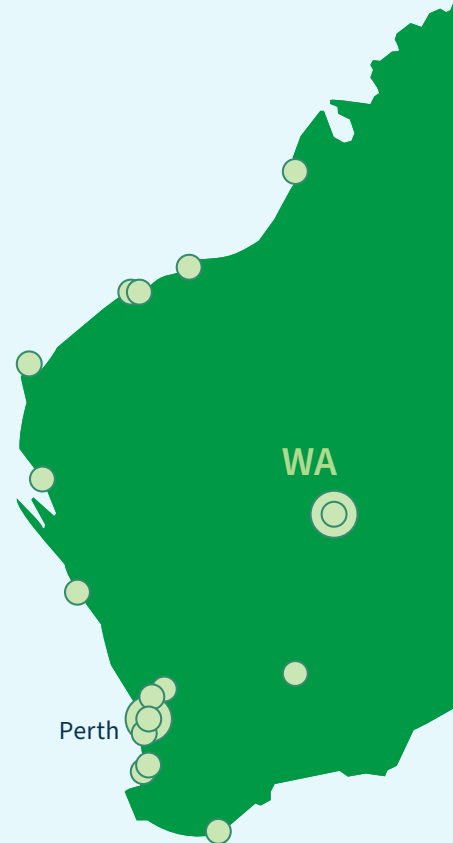
### Telecommunications

Fixed Networks / Wireless and Special Coverage Solutions / Operations and Services / Telecommunications New Zealand



### Transport

Transport Operations Australia / Transport Operations New Zealand / Transport Infrastructure Solutions



# Our people

**35,000+**

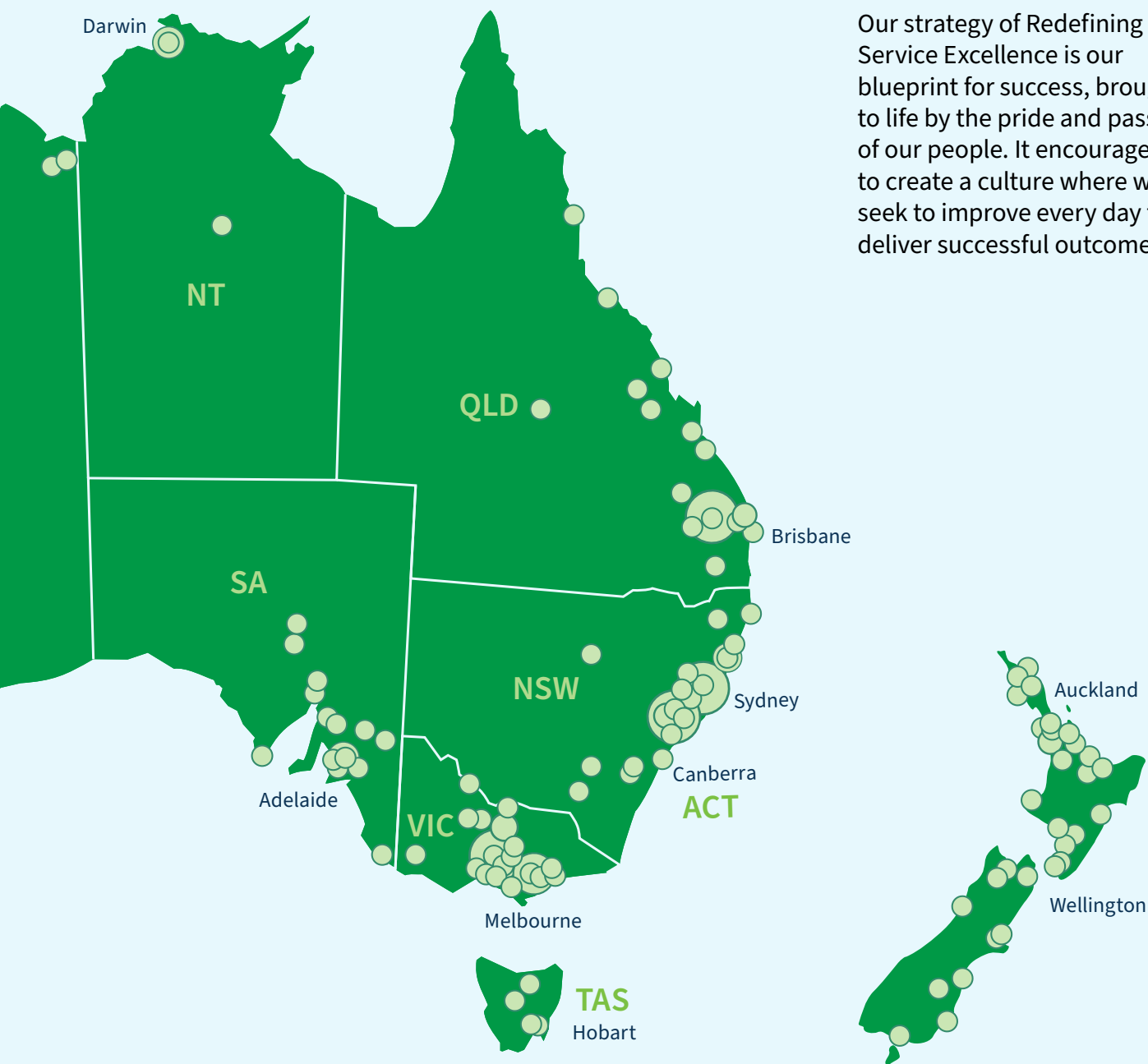
Workforce of employees and subcontractors

**400+**

Project sites throughout Australia and New Zealand

**40%+**

of our people work in regional and rural areas



## Our strategy

Our strategy of Redefining Service Excellence is our blueprint for success, brought to life by the pride and passion of our people. It encourages us to create a culture where we seek to improve every day to deliver successful outcomes.

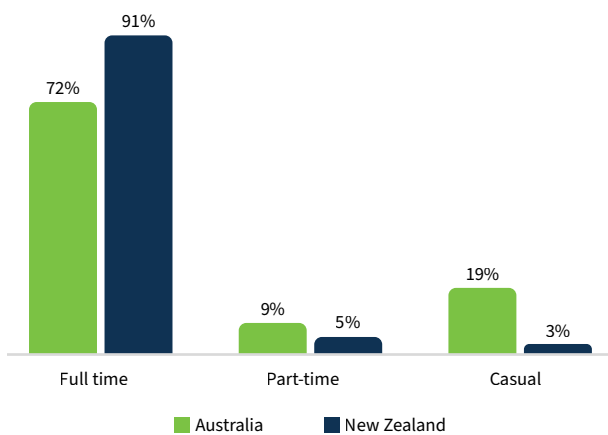
## OUR PEOPLE



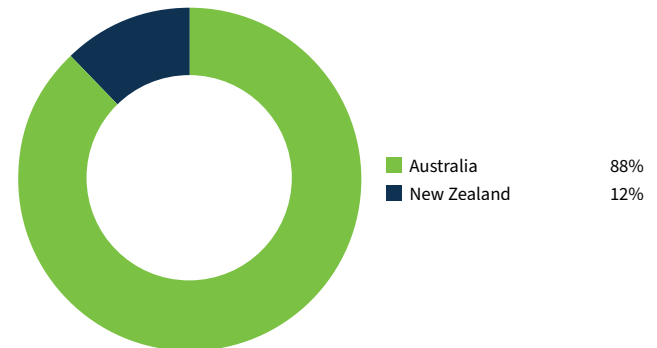
Ventia's total workforce as of 31 December 2023 comprised 15,639 full-time, part-time and casual employees, with 12% employed in New Zealand and the remainder in Australia.

Our teams operate across more than 400 project sites throughout Australia and New Zealand and 40% of our people work in rural and regional areas. In 2023 we hired more than 5,800 new employees and engaged over 20,000 subcontractors.

### Ventia workforce by employee group



### Ventia workforce by country



## Employee Relations

Ventia's workforce is comprised of a wide variety of skills and experience from highly skilled to unskilled labour. We respect our people's right to freedom of association and collective bargaining. Our employees are covered by industrial instruments including Modern Awards, Enterprise Agreements, Collective Employment Agreements and Individual Employment Agreements. We have a proactive approach to industrial agreement negotiation and are committed to building strong relationships that uphold the human rights of our employees.

In 2023 we successfully renegotiated workplace agreements for an average term of three years. We will continue this positive momentum as we move forward, working collaboratively with our employees and their bargaining representatives to secure mutually beneficial outcomes.

# Corporate governance

Our approach to governance is based on our values and our strategy. Our strategy focuses our activities to deliver on three strategic priorities (being client-focused, innovative and sustainable), creating value for our stakeholders. Our values guide us to do what’s right and act on what’s important to our clients, employees and the communities in which we operate.

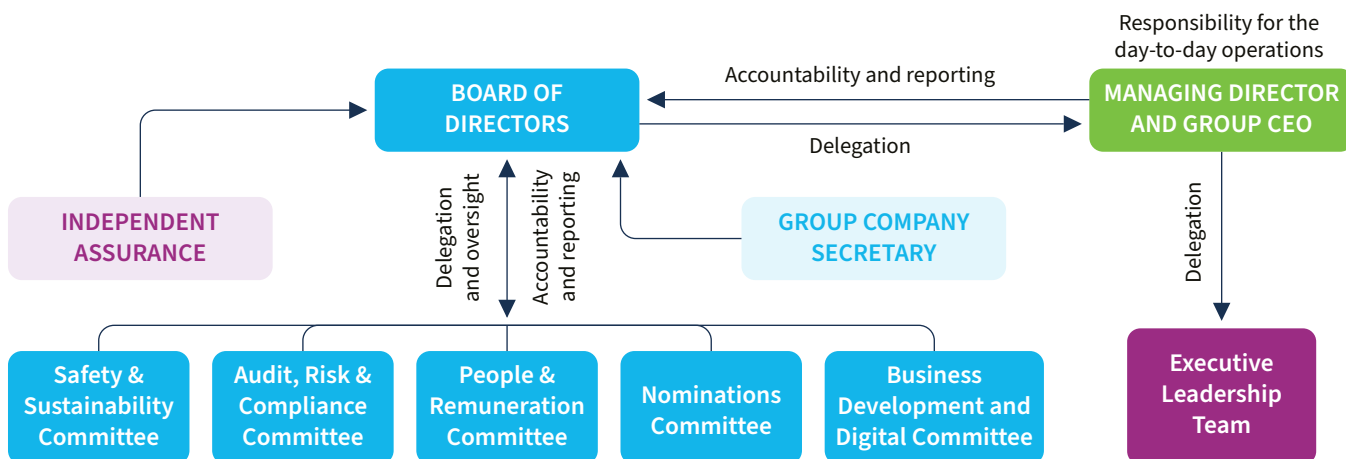
The Board is responsible for corporate governance at Ventia and its controlled entities (the Group), and actively demonstrates behaviours that are aligned with Ventia’s values.

The Board is governed by a Constitution and Board Charter which sets out the Board’s authority, responsibilities, membership criteria and the agreed principles by which it operates. These documents, together with Committee Charters and a Delegation of Authority Matrix (DoA), establish the relationship between the Board and Management.

Our Board Safety & Sustainability Committee (SASC) oversees workplace safety, health, environment, sustainability and modern slavery risks. The SASC meets quarterly and its Charter was refreshed in December 2023 to reflect best practices and stakeholder expectations.

For more information about Ventia’s corporate governance framework, practices and policies please refer to [Ventia’s 2023 Corporate Governance Statement](#).

## Corporate Governance Framework



# Policy framework

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

## Ventia's Code of Conduct

Steeped in our values, **Ventia's Code of Conduct** (the Code) sets out the standards of behaviour we expect from our people, suppliers and subcontractors. These artefacts define our commitment to good corporate governance and responsible business practices. They also reinforce the expectations we have of our engagement with clients, employees and the communities in which we operate, providing the foundation through which we maintain compliance with our legal obligations.

The Code outlines where our people can go for advice or to anonymously raise any concerns they may have, especially concerns regarding any conduct they believe may not meet the requirements of our Code. Our people can also contact our independent whistleblower line, the details of which can be found in the Ventia Whistleblower Protection Policy [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, which contains a modern slavery module, is part of our employee induction process and is a mandatory annual training requirement for Ventia's directors, managers and employees. More than 97% of our permanent full-time employees completed this annual training in 2023.

## Third-party suppliers to Ventia

Ventia's standard supplier and subcontractor contracts (including for labour hire companies) stipulate our requirement for third parties to understand and comply with the Code. If a third party is found to have acted in a way that is 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 Ventia Modern Slavery Policy was approved by the Board in 2020 and last updated in 2021. This Policy outlines our commitment to implementing processes in our value chain that seek to mitigate the risk of any form of modern slavery from occurring including slavery, servitude, forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage. The Policy is periodically reviewed as part of the Ventia's regular review process.

We are committed to working with our business partners to eradicate modern slavery from our value chain. 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, our International Trade Controls and Anti-money Laundering Policy.

Ventia's standard contract terms address modern slavery risk. These apply across our supplier base and require suppliers to warrant that any modern slavery risks present in their business are assessed, investigated and appropriately disclosed, and that such risks are addressed through appropriate due diligence and remediation programs.

Our suppliers must report any confirmed modern slavery cases, develop remediation plans and act within the defined contractual timeframe. They must also permit verification of their compliance, including access to premises and records as required.

Ventia's suppliers must commit to the inclusion of a similar and relevant clause in all contracts they may enter with any Tier 2 suppliers while performing under Ventia's operational control.





## Whistleblower protection policy

Our Whistleblower Protection Policy encourages the reporting of suspected misconduct or an 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 Code.
- financial fraud or mismanagement including tax related misconduct.
- unsafe or unethical work practices or work practices which endanger the environment;
- breaches of any legal, regulatory obligations, and
- any suspected breaches of Ventia's policies and standards.

Our Whistleblower Protection Policy also provides guidance on how a report may be made and the protections a Whistleblower must receive.

Overseen by the Board, the Audit, Risk and Compliance Committee is provided with details of any report received under the Whistleblower Protection Policy, as well as the outcomes of any investigations and consequent corrective actions taken. A copy of this Policy can be [found on our website](#).

## Other relevant policies

We have various other policies in place at Ventia to promote ethical and legal practices and behaviour in alignment with Ventia's values. These policies are also designed and implemented to uphold the human rights of employees, contractors, business partners, suppliers, clients and the communities in which Ventia operates, including our:

- Privacy Policy.
- Procurement Policy.
- Bribery and Corruption Policy.
- Health and Safety Policy.
- Disclosure Policy.
- Securities Dealing Policy.
- Diversity, Equity and Inclusion Policy.
- Sustainability Policy.
- Buying standard.
- Bullying and Harassment Standard.
- Business Partners Standard.
- EEO and the Prevention of Discrimination Standard.

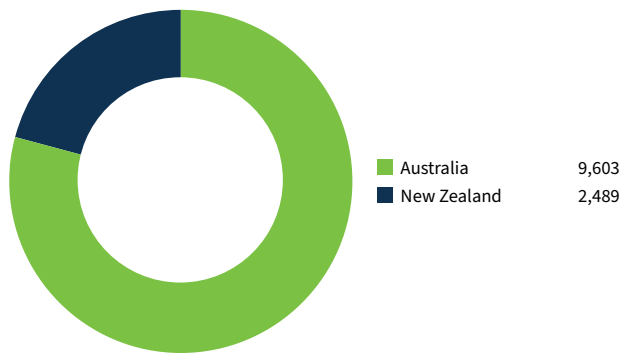
We periodically review the effectiveness of our policies, standards and processes to ensure they align with all legal and operational initiatives or obligations, including the requirements of the Act where applicable.

# Our supply chains

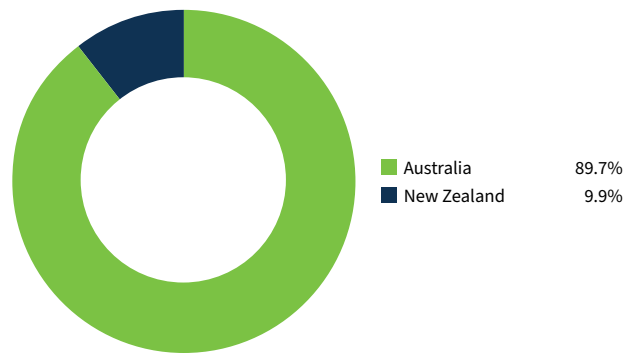
Ventia procures goods and services from approved large, medium and small businesses that provide our operations with goods and services across Australia and New Zealand. During 2023 we procured 99% of goods and services by spend from Tier 1 (direct) suppliers based in Australia and New Zealand. We also procured goods and services from other regions during the same period, with North America representing the largest Tier 1 trade region for Ventia outside of Australia and New Zealand.

We manage our procurement through our Group Supply Chain function, with local implementation exercised by our projects. Our commitment to buy from local suppliers remained strong in 2023. We continued to source more than 89% of all goods and services from our directly engaged suppliers in Australia, for use within Australia. We directly engaged over 12,000 (Tier 1) suppliers across Ventia, spending AUD \$3.9 billion during 2023. This focused commitment has continued to enable us to work closely with our supplier base to understand their operations and the partnerships within their supply chains.

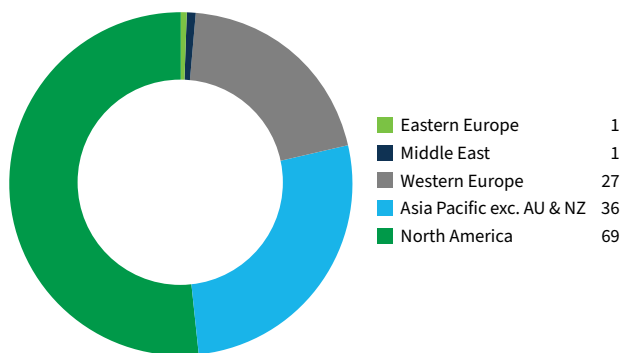
## Number of Ventia suppliers located in Australia and New Zealand



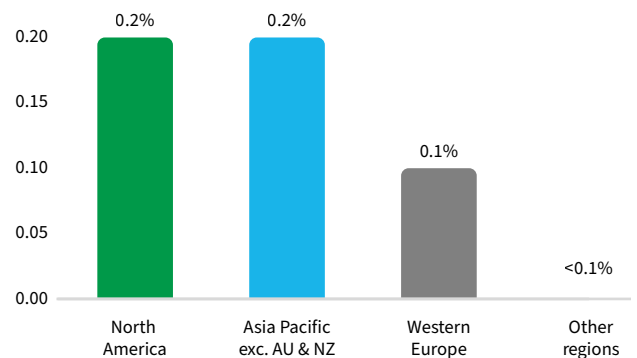
## Spend in Australia and New Zealand



## Number of suppliers located in other regions



## Spend in other regions approx 0.25%

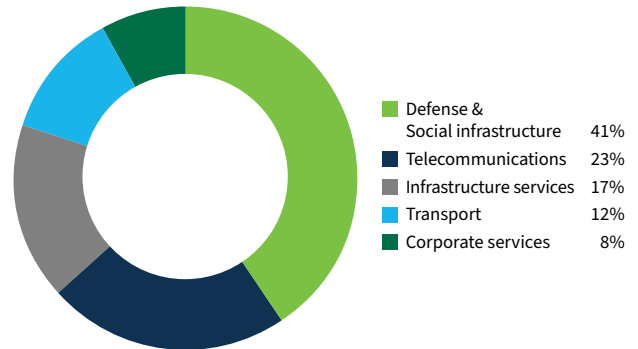


Individual projects may directly procure goods and services to meet their specific requirements and manage any geographical constraints. Ventia ensured that all procurement transactions adhered to Ventia’s Procurement Policy throughout the 2023 reporting period.

For example, Ventia’s Rig and Well Services business, a part of our Infrastructure Services sector, operates a facility in Queensland focused on steel fabrication, 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 2023 we procured materials such as electrical and hydraulic equipment and ancillary components for this facility directly from Australian suppliers.

We also engage external services in this process, including professional support such as engineering verification, electrical, programming, trade and fabrication support as required. These service providers are also based in Australia.<sup>3</sup>

## 2023 Supply chain spend across Ventia sectors



<sup>3</sup> Ventia Infrastructure Services sector conducts manufacturing in support of our Rig and Well Services business.

# Our risk management approach

In line with the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), we assess the risk of Ventia causing, contributing or being directly linked to modern slavery as an integral part of Ventia's Risk Management Framework.

During 2023 we assessed all Tier 1 suppliers engaged by our operations for risk and alignment against our Code and other relevant policies through their responses to our Business Partners Declaration and due diligence process at onboarding and throughout the procurement lifecycle.

Our standard supply and subcontract 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, which incorporates international validators (outlined below) plus a focus on sector and industry, products and services, geographic and entity-focused risks. We also considered the commercial leverage that Ventia has with supply chain partners in our modern slavery risk and opportunity identification process.

Should the need to remediate any confirmed modern slavery occurrence reported in our supply chain arise, remediation will be conducted in line with our process to engage business partners. This starts by performing an additional and targeted

due diligence review, followed by a series of issues resolution steps, and escalates to ceasing all dealings with the business partner in question should no alternative resolution be devised. We acknowledge that the welfare of slavery survivors is foremost in the remediation process and decision-making in any confirmed case of modern slavery.

## International validators

We continued to utilise the Global Slavery Index (GSI) as the main pillar of our risk assessment for inherent geographical risk, utilising 2023 data published by the GSI through the Walk Free Foundation in our most recent modern slavery supply chain risk assessment.

The GSI provides a country by country ranking for 182 countries 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's List of Goods Produced by Child or Forced Labor, which details goods for which there is 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 (TVPRA). The list comprises 159 goods from 78 countries, as published in September 2022.



## Geographic location of origin for product and services

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

## Identification of product and service risks

We assess our operations and the human rights performance of our suppliers based on risks associated with the geographical origin and the type of products or services procured. We continued our category-based approach to supplier risk management in 2023, while considering our opportunity as a purchaser to instil stronger action and greater transparency within our supply chains.

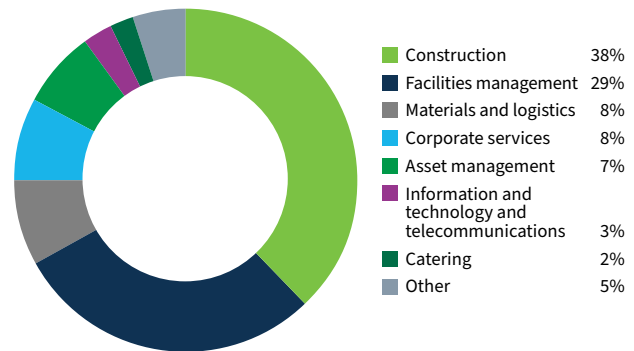
In 2023 we directly imported a very small proportion of our total Tier 1 product purchases from overseas suppliers. Most of these suppliers are based in OECD defined low-risk countries, from North America and Western Europe.

The analysis conducted across the Group for 2023 found that human rights risks, including those linked to modern slavery, continued to be more prominent in the procurement of low-value transactions, such as protective and high-visibility clothing and third party provision of cleaning services for Ventia and our clients. These categories continue to be of particular focus in our supplier engagement approach.

We also assess sustainability risks including Human Rights/modern slavery exposure of relevant suppliers as part of selection and contract renewal processes 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 non-engagement, consulting or escalating with senior management, implementing a remediation plan or suspending their contract.

## Spend across top supplier categories



Our modern slavery risk assessment over the 2023 reporting period was conducted to identify the risk of Ventia causing, contributing, or directly being linked to modern slavery practices in our supply chains. The following products and services continue to be identified as the most material 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.

Specific supply chain conditions related to the nature of the workforce involved in the delivery of goods or services procured, inherent geography-based modern slavery risks and the risk materiality of the commodity being procured, are factors we use in our modern slavery risk assessment.

Based on the location and services provided by the suppliers of the above products and services, the risk of modern slavery for these categories has been assessed as low to medium. We identified 132 suppliers for further engagement in line with our modern slavery Risk Management Framework, covering approximately AUD \$203 million or 5% of our total annual spend.

# Risk mitigation measures

Our modern slavery due diligence process continues to evolve to ensure that newly engaged suppliers participate in our onboarding process. Our modern slavery questionnaire is supplemented by our broad business partners due diligence process, which is applicable to all new suppliers and requires them to execute a general due diligence questionnaire. Additionally, suppliers with whom we spend more than AUD \$1 million annually must complete our Business Partners Declaration due diligence questionnaire, which further addresses the risk of modern slavery in suppliers' operations.

## Due Diligence Outcomes

Our Business Partners Standard sets out practical rules of engagement to minimise the risk that any Ventia business partners (new or existing) will participate in bribery, fraud, corruption or other unethical business practices, including modern slavery or any other human rights violations.

This Standard applies to all Ventia employees defined as all officers, employees and contractors of Ventia, whether permanent, fixed-term or temporary, and including directors, executives and managers.

Appropriate due diligence was conducted throughout 2023 on potential business partners before entering a business relationship, transaction or contractual arrangement with Ventia, to ensure they are not at risk of engaging in behaviour that breaches our Code of Conduct. A total of 16% of our supply chain by spend was covered by business partners due diligence in Australia and New Zealand in 2023.

In select areas of our operations, we have expanded our trial to require all new suppliers to complete a sustainable procurement questionnaire covering environmental, economic and social sustainability aspects of the procurement process, including the supplier's current modern slavery risk mitigation controls.

## Outcome

**We did not identify any confirmed instances of modern slavery related to Ventia's supply chains during 2023 relevant to this Statement.**

We acknowledge that this outcome does not prove the absence of modern slavery in our supply chains as we operate and procure goods and services from regions where modern slavery is present.

## Measurement of effectiveness

We are committed to measuring how effective our risk mitigation actions are. During the 2023 reporting period we measured the effectiveness of our modern slavery risk mitigation response based on:

- Our due diligence processes.
- Supply chain management and procurement.
- Payroll audits conducted by internal and external experts.
- Employment terms and conditions are constantly reviewed by our People & Capability function for compliance.
- A review of the integrity, accuracy and relevance of data reported by suppliers.
- Our grievance mechanism – whistleblower reports.

Our supply chain approach focuses on improving risk visibility, while managing our large and diverse supplier base. We focused on the accuracy and completeness of procurement data during 2023, as this is key to ensuring our actions continue to deliver improvement.

Our due diligence process captures the volume and quality of responses submitted by our business partners related to their self-assessment of how they manage modern slavery risks in their supply chain. 75% of eligible suppliers submitted a response to our business partners due diligence questionnaire in 2023, equivalent to 16% of Ventia's total annual spend. No corrective actions were identified as required from responses submitted.

Our people and capability systems, policies and processes have been designed and improved to ensure that we manage modern slavery risks internally, as we lead and manage our people at Ventia.

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.

Our 2023 annual modern slavery risk assessment covered the entirety of our Tier 1 supply chain as set out in our modern slavery risk management approach. We increased the visibility of modern slavery risks, which may be present in our business and supply chains with a focus on collaboration with suppliers, while enforcing our due diligence and contractual compliance processes.

## Consultation process

The Board is responsible for the overall corporate governance of Ventia and its controlled entities. All Ventia-controlled operating companies have procurement professionals assigned to their specific businesses. These employees operate in conjunction with central management and are directly involved in matters relating to Modern Slavery Act compliance – including the planning and review of procurement activities across the whole business.

Sufficient consultation took place across the Group during 2023, including across all Ventia-controlled entities to ensure a meaningful and ongoing dialogue between each entity.

As part of their overview of all Ventia entities, directors of Ventia’s Board met with directors of other Ventia-controlled entities (reporting entities) during 2023.

Ventia and each of the reporting entities in [Appendix 1](#) have approved this Statement and delegated authority to the Managing Director and Group Chief Executive Officer to sign it.

## Annual assessment plan progress

| Role  | Objectives   | Measure of effectiveness  | 2023 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.   | Ventia's supplier on-boarding process requires that suppliers accept contract terms mandating compliance with Ventia’s anti-Bribery and Corruption laws and to observe and comply with Ventia’s Code of Conduct.<br><br>16% by spend of supply chain covered by Business Partners Due Diligence.   |
|   | 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 Infrastructure Sustainability Council Modern Slavery Coalition mapping of the bitumen supply chain in Australia to identify areas of potential concern related to modern slavery (see case study).<br><br>Incident response staff training at Transurban Queensland Assets contract in collaboration with our client (see case study). |

## RISK MITIGATION MEASURES

| Role   | Objectives   | Measure of effectiveness   | 2023 progress  |
|--|--|--|--|
| <b>As a purchaser of goods and services</b><br>continued | Ongoing supply chains risk analysis.   | Improve transparency of Tier 2 suppliers. Increase collaboration with suppliers identified with potential risk of modern slavery.                      | Improved completeness and accuracy of 2023 spend data.<br><br>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 risk, 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.   | 97.3% of our permanent full-time employees (12,513) completed the annual training on our Code in 2023, including 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 Protection Policy remains an important focus as Ventia continues to refine and improve ESG processes.<br><br>In 2023 no reports of modern slavery issues were received.   |
|  | 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.                                       | Consistent with previous years, Ventia instructed independent auditors with specific expertise in payroll compliance to review its highrisk payrolls. These audits did not disclose any systemic issues of concern in 2023.  |

Our near-term priority is to work with our key stakeholders to optimise the systems and processes that support our modern slavery risk identification and mitigation. A clear and collaborative pathway is essential to the remediation of any adverse effects identified in our operations and supply chain.



# External collaboration

Our continuous improvement approach to tackling modern slavery risks in our operations leverages consultation with a range of external stakeholders. This requires us to engage with clients, suppliers and other infrastructure service providers in Australia and New Zealand. The process is documented within our modern slavery management plan.

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

## CASE STUDY

### Mapping the bitumen supply chain 2023

Bitumen is an oil-based derivative utilised mostly as a binder ingredient in asphalt for road construction and maintenance. It was identified as a commodity of interest to the Infrastructure Sustainability Council (ISC) Modern Slavery Coalition members who commonly use the product across their businesses.

As an FY23 workplan action, Coalition members including Ventia designed a pilot study to map the supply chain of bitumen used in Australia. The study aimed to identify the steps and key organisations that form part of this value chain where there may be potential for modern slavery risks and to seek collective approaches to mitigation.

Engagement with stakeholders identified that bitumen imported into Australia as a finished product was likely to be primarily sourced from Southeast Asian countries, including Thailand and South Korea, which are high and moderate slavery incidence countries respectively according to the 2023 Global Slavery Index. Bitumen manufactured in Australia involves the importation and use of raw materials, mostly from Middle Eastern countries, which are processed into the bitumen at a domestic refinery.

Learnings about country of origin for such materials were assessed against Global Slavery Index (GSI) risk data, initially suggesting that bitumen had lower exposure to geographic risks when manufactured in Australia. However, analysis revealed that importing raw materials to manufacture bitumen locally ultimately entailed higher inherent geographic modern slavery risks, as the sourcing of raw oil derivatives from countries with a high incidence of modern slavery such as Iraq, Bahrain and Saudi Arabia had a compounding risk effect.<sup>4</sup> Inherent geographic risks associated with imported finished bitumen from South Korea and Thailand were also considered in this research but demonstrated a lower overall risk profile.

Further work is needed to build the capacity of organisations in the supply chain to assess, manage and mitigate risks to people, such as modern slavery. Collaborative research, engagement and consultation proved critical in developing a robust level of information in this pilot, as well as building relationships beyond initial contact to overcome barriers to transparency.

## CASE STUDY

### Collaborating to build capacity with our partners

As a large infrastructure services provider, we collaborate with our clients to raise awareness about how to identify potential cases of modern slavery on the ground by building capacity and awareness within our workforce, regardless of role and location.

During 2023 we again partnered with Transurban to train our team members working on the maintenance and operation of Transurban's road assets in Queensland. This training collaboration builds on the learnings delivered to our New South Wales team members in 2022 and was enhanced by updated learnings added from Transurban, Ventia and NGO best practice.

The updated training sought to build capacity by increasing team members' understanding of exploitation and modern slavery, helping them to identify potentially vulnerable people in our operations and value chain, while increasing their awareness and confidence to escalate and raise concerns through a clear process.

The training session covered the incidence of modern slavery in international and domestic contexts and types of modern slavery situations that can be encountered in the context of road maintenance and operations. It provided examples of what industries or activities may be involved in modern slavery, outlined some physical indicators to help identify vulnerable people and explained how exploitation often occurs.

Participants heard about real-life cases, including people smuggling and human trafficking across Asia and Europe, as well as exit trafficking, human trafficking, coercion and debt bondage in Australia.

Practical, workshop-style activities were conducted to test understanding, such as how to respond to an on-road incident where passengers are displaying signs of vulnerability and spotting potential modern slavery risks when procuring goods or services with suppliers. During the session, personal stories were also shared by participants, which highlighted the vulnerability of migrant workers.

<sup>4</sup> Walk Free 2023, Global Slavery Index 2023. Available from: [www.walkfree.org/global-slavery-index/](http://www.walkfree.org/global-slavery-index/)

# Appendix 1 – Reporting entities

1. Ventia Services Group Limited
2. Ventia Services Pty Ltd
3. Ventia Finco Pty Ltd
4. Ventia Holdings I Pty Limited
5. Broadspectrum (Finance) Pty Ltd
6. Broadspectrum (Holdings) Pty Ltd
7. Broadspectrum (International) Pty Ltd
8. Broadspectrum (Oil & Gas) Pty Ltd
9. Broadspectrum Pty Ltd
10. BRS Holdco Pty Ltd
11. Easternwell Group Assets Pty Ltd
12. Easternwell Group Investments Pty Limited
13. Easternwell Group Operations Pty Ltd
14. Easternwell Group Pty Ltd
15. Easternwell WA Pty Ltd
16. Piver Pty Ltd
17. Ventia Asset Infrastructure Services Pty Limited
18. Ventia Australia Pty Ltd
19. Ventia Property Pty Ltd
20. Ventia Pty Limited
21. Ventia Utility Services Pty Limited
22. Visionstream Australia Pty Limited
23. Visionstream Services Pty Limited
24. Kordia Solutions Pty Limited
25. Visionstream Pty Limited

# Statement compliance

| Australian Modern Slavery Act mandatory reporting criteria  | Ventia response                             | Statement Page | Detail  |
|---|---|----------------|---|
| a) Identify the reporting entity.   | Introduction                                | 1              | <ul style="list-style-type: none"> <li>Ventia Services Group identified as the main reporting entity.</li> </ul>  |
|   | Appendix 1                                  | 16             | <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.   | Our operations                              | 2              | <ul style="list-style-type: none"> <li>Ventia four sectors described.</li> <li>Ventia operational footprint infographic.</li> </ul>   |
|   | Our supply chains                           | 8              | <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.                                       | Our risk management approach                | 10             | <ul style="list-style-type: none"> <li>Our risk management approach.</li> <li>International validators.</li> </ul>  |
|   | Identification of product and service risks | 11             | <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.          | Risk mitigation measures                    | 12             | <ul style="list-style-type: none"> <li>Risk mitigation measures.</li> <li>Due diligence outcomes.</li> <li>Incident Response Training Pilot at Transurban Queensland Assets contract – see '<i>collaborating to build capacity with our partners case study</i>'</li> </ul> |
|   | Annual assessment plan progress             | 13             | <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.   | Measurement of effectiveness                | 12             | <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). | Process of consultation                     | 13             | <ul style="list-style-type: none"> <li>Consultation process.</li> </ul>   |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.   | External collaboration                      | 15             | <ul style="list-style-type: none"> <li>Ventia's engagement with the modern slavery coalition.</li> <li>Incident Response Training Pilot at Transurban Queensland Assets contract – see '<i>collaborating to build capacity with our partners case study</i>'.</li> </ul>    |

