



Modern Slavery Statement 2020



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About SeaLink Travel Group

SeaLink Travel Group Limited ACN 109 078 257 (SeaLink) is listed on the Australian Securities Exchange (ASX) and is Australia's largest land and marine tourism and public transport service provider, with established international operations in London and Singapore. SeaLink provides innovative and efficient transport solutions that link people and communities with places and experiences. With a genuine care for our customers, people and the environment, we believe in delivering safe, convenient and sustainable transport that keeps people connected.

SeaLink is one of Australia's most experienced and diverse multi-modal transport businesses, boasting performance-driven capabilities across ferry, bus and light rail.

The SeaLink Group is made up of SeaLink Australian Marine and Tourism operations and facilities, and the two new divisions of the acquired Transit Systems Group, operating domestic and international public bus and light-rail transport contracts, with operations in seven Australian states and territories, as well as Singapore and London.

SeaLink is a business with a focus on innovation and is leading the way in the area of sustainable transport and tourism experiences, with the introduction of electric buses in Perth and London underway, electric buses currently operating in NSW, on demand services in Sydney, and is part of the world's first hydrogen consortium, the H2OzBus Project. SeaLink also operates an eco-tourism resort on the world heritage listed, Fraser Island and eco experiences and tours in Queensland and South Australia.

Headquartered in Adelaide since 1989, the business has experienced a remarkable period of growth, the most recent example being the acquisition of Transit Systems Group in January 2020. SeaLink has emerged as a leader in both public transport and local tourism, bringing together Australia's most dynamic travel company and a global transport leader in public Transport.

Introduction

SeaLink Travel Group Limited (SeaLink) supports the Commonwealth Government's commitment to combating modern slavery in global supply chains and the introduction of modern slavery reporting pursuant to the Commonwealth Modern Slavery Act 2018 (the Act).

This statement sets out SeaLink's first report outlining its approach to managing risks of modern slavery and its anti-modern slavery practices in compliance with its reporting obligations under the Act. The Act requires entities who are operating or carrying on business in Australia and which have a consolidated revenue of \$100 million or greater, to report annually on their actions to assess and address the risks of modern slavery in its operations and supply chains.

The term 'Modern Slavery', as defined by the Act, defines modern slavery as including eight types of serious exploitation and includes trafficking in persons, slavery, servitude, forced labour, debt bondage, deceptive recruitment, forced marriage, and the worst forms of child labour: situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

SeaLink appreciates that it has both a moral and legal responsibility to ensure, to the best of its knowledge, that modern slavery practices do not exist within its operations and to maintain a responsible underpinning supply chain. SeaLink finds it wholly unacceptable that in 2016 there were an estimated 24.9 million people worldwide who were victims of forced labour, 16 million of which were exploited in the private sector through domestic work, construction or agriculture as reported by the International Labour Organisation.

The SeaLink Board unequivocally condemns modern slavery in all its forms and our expectation is that all our employees, suppliers, subcontractors and any other person or entity affiliated with our business share this view.

REPORTING ENTITY

SeaLink Travel Group Limited is the ultimate holding company and a reporting entity for purposes of this Modern Slavery Statement. The Group consists of numerous subsidiary entities both nationally and internationally.

The following SeaLink Travel Group Limited wholly owned subsidiary entities are also reporting entities for purposes of the Act and together with SeaLink have prepared this joint statement:

- Transit Systems Pty Ltd
- Transit Systems West Pty Ltd

This statement has been prepared and submitted on behalf of SeaLink Travel Group Limited and the above entities in respect of the operations of the SeaLink Group.

For a list of the entities part of SeaLink Travel Group click [HERE](#).



Our Business Structure & Operations

OUR BUSINESS

SeaLink is a public company, listed on the Australian Securities Exchange (ASX). Since inception, SeaLink has delivered transport services, initially through a ferry service between Kangaroo Island and the mainland in South Australia.

In January 2020 SeaLink acquired the Transit Systems Group in a transformative transaction. As a result, SeaLink is now a leading multi-modal integrated transport operator, delivering essential services through public transport operation contracts on behalf of governments globally and also offers brilliant holiday and tourism experiences to some of Australia's most desired and idyllic locations.

As of 30 June 2020, our business operations and divisions are structured as follows:

OUR DIVISIONS

Australian Public Transport Division



Transit Systems provides public transport services including bus and light rail operation, on behalf of governments in Australia.

International Bus Division



Tower Transit provides bus public transport services under contract to government transport agencies in Singapore and London.

Marine & Tourism Division



SeaLink Marine & Tourism Division provides passenger and transport ferry services, tourism experiences and resort facilities within Australia.



8,600
EMPLOYEES

280M
PASSENGERS/YEAR

3,500
BUSES

80
FERRIES

12
CITIES

14
ISLANDS

Information as at 30 June 2020



OUR PUBLIC TRANSPORT GOVERNMENT PARTNERS





Our Supply Chain

SeaLink aims to partner with suppliers and vendors who share our organisation’s ethical values regarding modern slavery, anti-corruption, personal data protection and human rights more broadly. SeaLink will not knowingly contract with or purchase from companies who are in violation of human rights practices and we understand that external providers who SeaLink interact with may reflect on our organisation.

To deliver our extensive range of services, SeaLink partners with a large, dynamic network of suppliers and subcontractors. SeaLink’s supply chain is diverse in not only its product and service offerings but differs in supplier entity size from large corporates to small and medium local businesses.

Our supply chain consists of both direct and indirect suppliers. As an Australian based business and through contractual commitments to our clients, we make local Australian sourcing a priority, when possible, within our Australian operations. We aim to ensure that prior to contracting or entering into supply arrangements with another entity, the entity is aware that SeaLink expects they act honestly, lawfully and ethically.

Our Group supply chain is broadly reflected into the categories noted below:

1. General goods and services –for operational purposes e.g. fuel, external cleaning, bus/vessel parts, uniforms, telco/IT services etc
2. Maintenance services – services required for works on assets and property e.g. specialised repairs for vehicles/vessels, qualified tradesperson etc
3. Capital purchases – purchase of assets e.g. purchase of vehicles/vessels, property etc
4. Retail goods – products purchased for resale purposes e.g. food and beverage, merchandise etc
5. Professional services –to support business operations/programs e.g. financial, advisory, technical and audit services etc.
6. Indirect suppliers – suppliers who do not have a direct trading relationship with SeaLink but are part of a recognised SeaLink supplier’s underlying supply chain.

DIVISIONAL SUPPLY CHAIN OVERVIEW

The below provides an overview of SeaLink’s grouped divisions and its regular type of supply chain activity.

Australian Public Transport	<ul style="list-style-type: none"> • Goods and services i.e. fuel, oils and lubricants, spare parts, tyres, uniforms, cleaning services, telco/IT services, utility services • Maintenance services i.e. crash repairs, chassis repairs, engine repairs, windscreen repairs, general trades person works
International Bus	<ul style="list-style-type: none"> • Goods and services i.e. fuel, oils and lubricants, spare parts, tyres, uniforms, cleaning services, Telco/IT services, utility services • Maintenance services i.e. crash repairs, chassis repairs, engine repairs, windscreen repairs, general trades person works
Marine & Tourism	<ul style="list-style-type: none"> • Goods and services i.e. fuel, spare parts, uniforms, cleaning services, Telco/IT services, utility services • Maintenance services i.e. vessel repairs, engine repairs, blasting and painting, general trades person works • Retail goods i.e. food and beverage, company merchandise

Risks of Modern Slavery in Operations and Supply Chain

At SeaLink we understand that combating modern slavery is a significant issue within operations and supply chains globally and is not limited in entirety to a certain specific location or industry. Therefore, SeaLink welcomes the Commonwealth Government legislation to increase transparency of and combat this confronting problem.

As a global operation supported by a considerable supply chain, we appreciate the potential that modern slavery could be linked to our business directly, indirectly or through association. SeaLink acknowledges, that although it is more likely modern slavery practices may occur in geographic locations with a lesser reputation for supporting human rights, it is our responsibility to communicate to our employees and supply partners to operate ethically.

OPERATIONAL RISK

As a business that operates both domestically and internationally, SeaLink has employees based in Australia, Singapore, and the United Kingdom. Whilst SeaLink operates on a global stage, the largest proportion of our operations are conducted within Australia, where most of our employees are located. From a geographical perspective, given the controls and societal expectations in Australia this lessens the risk to most of our workforce from being subjected to modern slavery labour practices.

Likewise, our international presence and operations based in Singapore and London fall in the lower geographical country risk category as these locations are likely not be considered as high-risk geographies with vulnerable populations. However, we continue to monitor all our businesses to ensure all operations are undertaken in safe environments and our workforce is treated fairly under the relevant legislation and/or enterprise agreements.

Given the considerable risks associated with modern slavery occurring within the operational aspects of our business, SeaLink will progressively continue to communicate to all employees, contractors and those affiliated with our organisation our expectations and their obligations, where possible.

SUPPLY CHAIN RISK

Our business collaborates with a significant number of supply partners who contribute to our underpinning supply chain, which is extensive and diverse. SeaLink considers the potential risk of modern slavery practices occurring within our supply chain to be materially more possible than directly within our operations.

During the reporting period, we have internally undertaken a high-level review of our supply chain operations to pinpoint areas that may be more susceptible or have greater exposure to the risk of modern slavery being present. As a result of this assessment, areas highlighted as higher risk include suppliers who import a high volume of goods manufactured overseas, aftermarket products and labour hire services.

Our view is that our direct suppliers – especially those whom we have active contractual relationships with – present a lesser risk in terms of engaging in modern slavery behaviour in comparison to that of our indirect suppliers. This is due to those suppliers being engaged by SeaLink through more robust and diligent processes e.g. tender processes, contractual conditions, contract management overview and reporting mechanisms etc.

Moving forward, SeaLink will attempt to further engage with our supply chain to review our suppliers (specifically those considered ‘higher risk’) to re-affirm their commitment to and compliance with the Commonwealth Modern Slavery Act 2018.

Our Actions

How we mitigate and address the risk of modern slavery

SeaLink is committed to enhancing our processes to assess and address potential modern slavery risks within our businesses at both a corporate and local level, where possible. We understand that the abolishment of modern slavery activity is a marathon, not a sprint. We intend to take a risk-based approach and refine our governance arrangements, policies and procedures, and supply chain documentation to improve our position as an organisation that opposes modern slavery in all its forms.

OUR VALUES

At SeaLink, we believe our Group values embody the culture of our business operations both commercially and ethically. It is our goal to create an environment where likeminded individuals fundamentally share similar moral principles and behaviours, to conduct activity on behalf of the Group with the greatest standard of integrity.

We refer to these values as our "COMPASS". These values set the tone for our operations.



CUSTOMER FOCUSED

We focus on delivering an excellent experience for every customer

ONE TEAM

We are one united team. We support, respect and value each other

MOTIVATED

We embrace each day with energy, enthusiasm, and a can-do attitude

PROFESSIONAL

We take responsibility to 'do the right thing' with honesty and integrity

AUTHENTIC

We are 'real' and genuinely care about what we do

SUCCESSFUL

We are easy to do business with and we deliver results

SAFETY FIRST

We make safety a priority in everything we do

Following the acquisition of the Transit Systems Group and Tower Transit Group in January 2020 we are currently working with our teams to further align and communicate our COMPASS values to all our employees and contractors across the expanded group so that they are aware of and understand the importance of our values in conducting our operations. Where alternate values statements historically existed in different parts of our Group we recognise that those teams may express our values differently, and accept that different forms of values statements may be used in different parts of our business so long as they are consistent and aligned to our Group values. For example our Singapore operations also refer to the CITIES values (Care, Integrity, Teamwork, Innovation, Excellence, Safety). All employees and contractors are expected to uphold our group values.

GROUP RISK MANAGEMENT

During the FY20 reporting period we commenced updating our business risk registers for consistency and expanded Group. These risk management reviews and updated risk assessments created an opportunity to further assess the risks of modern slavery in our supply chain and were part-completed during the reporting period.

Policies & Standards

SeaLink currently has a suite of established policies and procedures that outlines our expectations of employees and contractors who undertake tasks on behalf of the Group. Our policies and procedures help us implement and demonstrate our commitment to ethics, wellbeing, safety, and protections afforded to team members. The following key group policies and procedures, approved under SeaLink's governance framework, influence our behaviour towards Modern Slavery:

CODE OF CONDUCT

SeaLink is committed to not only complying with its legal obligations, but also to acting ethically and responsibly. This Code of Conduct sets out the requirements that all SeaLink employees are required to meet when carrying out their roles or representing the company.

DELEGATIONS OF AUTHORITY

SeaLink has a Delegation of Authority (DoA) directive which is applicable to all group operations. The DoA ensures that relevant senior management have oversight of key decisions, undertakings, and expenditure within the Group's portfolio. The DoA provides comfort that our actions as an organisation are both tangibly auditable and appropriate consultation and management approval is obtained when conducting our activities.

RESPECTFUL WORKPLACE BEHAVIOUR POLICIES

SeaLink is committed to providing a professional work environment, free from discrimination, victimisation and workplace harassment, including workplace bullying and sexual harassment. Policies and processes are in place across our Group to support this commitment for our employees.

WHISTLEBLOWER PROTECTION POLICY

SeaLink is committed to acting with fairness, honesty and integrity. This policy encourages people to speak up if they become aware of wrongdoing and help deter wrongdoing; explains how to speak up and what protections a discloser will receive; outlines how SeaLink will respond to reports made under this policy; and promotes a "safe to speak up" culture in which everyone feels protected and supported. This policy is intended to supplement, and not limit in any way, the provisions of the Corporations Act in relation to whistleblowing where they apply.

DIVERSITY AND EQUITY POLICY

SeaLink recognises that a talented and diverse workforce is a key competitive advantage, and our success reflects the quality and skills of our people. SeaLink benefits by bringing together high-quality people of diverse backgrounds. The SeaLink Board undertakes an annual assessment of performance against diversity objectives. This policy applies to all SeaLink employees, contractors, directors, and officers at all SeaLink locations.

HEALTH AND SAFETY POLICY

SeaLink is committed to ensuring a safe and healthy working environment for all personnel and the prevention of work related injuries and illnesses by providing and maintaining safe working environments, including a work health and safety management system and safe systems of work in compliance with relevant legislation. At SeaLink we believe in making safety a priority which goes beyond our working environment. It is part of our everyday life, our families, our friends and our community. It is our way of thinking. This policy applies to all SeaLink workplaces.

Increased Procurement Visibility

SeaLink as a business has grown rapidly over the past year due to a strategic transformative acquisition – the acquisition of the Transit Systems Group. As a result, SeaLink has implemented a dedicated centralised procurement function to support the local procurement aspects of its subsidiaries that operate within a decentralised model.

By adding a dedicated procurement function to our business, it has resulted in the completion of several national supply agreements, that have been managed through more mature tender processes. Specifically, in relation to possible modern slavery activity, SeaLink requires potential suppliers to state their commitment and compliance with the Commonwealth Modern Slavery Act 2018.

Below is an excerpt from a Request for Proposal document issued by SeaLink to suppliers in May 2020 as an example.

The Client requires that you provide a statement to the best of your knowledge that in the event your Proposal is accepted the underlying supply chain utilised in the manufacture, transportation and delivery of goods and services does not contain elements of modern slavery. Please also outline any mechanisms your organisation has in place to mitigate these risks.

As stated previously, SeaLink is aware of the potential of modern slavery to be present in its underlying supply chain and is committed to ensuring suppliers understand their obligations when trading with a SeaLink entity. It is our expectation that suppliers follow through on their commitments and to this end SeaLink will flag any potential issues, that may become apparent, through the contracted term.

INTERNATIONAL COMMITMENT

The Tower Transit Group Limited (Tower), part of the broader SeaLink Group, operates essential public bus transport services in the United Kingdom and Singapore. Tower Transit operates services on behalf of Transport for London (UK) and the Land Transport Authority (Singapore).

Under the UK's Modern Slavery Act 2015 legislation, Tower has for some years assessed risks of modern slavery in its supply chain and articulated its approach to managing risks of modern slavery practices in both its operations and supply chain in an annual statement available on the Tower Transit website. Tower Transit is committed to ethical dealings and aims to maintain the highest standard of business conduct with its customers, suppliers, employees, and the communities wherever they operate around the world.

Tower Transit has stated its desire that each and every one of its suppliers conduct business in a lawful and ethical manner, including business practices that prevent slavery and human trafficking in its own supply chain. Tower Transit selects suppliers and business partners carefully. Should any selected supplier not attain the standards that Tower Transit expects, Tower Transit will not do business with them.

To read Tower's publicly available modern slavery statement, [CLICK HERE](#) or scan the QR code below.



Consultation with SeaLink Entities

During the reporting period to 30 June 2020, some high-level consultation occurred between the SeaLink entities both nationally and globally.

During FY2020 SeaLink embarked on a large integration project following its acquisition of the Transit Systems Group. That broader project involved consultation on a variety of areas as part of planning for integration of our divisions. As this is our inaugural SeaLink Modern Slavery Statement, formalising our assessment of and combating the risks of modern slavery in SeaLink's operations and supply chains has been lead and documented initially at corporate level. Consideration of modern slavery risks for the newly acquired divisions during the FY2020 reporting period occurred as part of broader due diligence including consideration of the risks for Transit Systems as the previous parent company for the Australian bus operations (prior to purchase by SeaLink in January 2020) and Transit Systems West Pty Ltd which conducts a large part of the Australian bus operations in Sydney. Representatives of each reporting entity have been consulted and reviewed this statement as part of our processes.

It is our intention to workshop modern slavery risks with a broader cross-functional team across our group. The purpose of this is to increase awareness and understanding of the risks and find solutions as to how our Group best monitors and addresses the risks of modern slavery entering our operations and/or underlying supply chain.

SeaLink currently has an established internal Board Audit and Risk Committee and a Group Executive Risk Committee as part of its governance arrangements. It is intended that both these Committees will retain oversight of our modern slavery, human rights, and anti-corruption risks, as we assess the potential for these types of behaviours occurring in our operations and supply chain.

OUTLOOK

At SeaLink, we understand that we are at the very beginning of a progressive journey which will require us to continually educate our employees and engage our suppliers to refine our processes to manage the risk of modern slavery.

Moving ahead, we intend to progress the following actions to build on our existing commitments:

Increase our internal understanding:

- Bring together a broader group of representatives of key entities within our diverse Group to workshop the threat of modern slavery.
- Develop a training program for our Australian employees to increase their awareness of modern slavery and the risks it poses to our daily operations and supply chain activity.
- Further review our operations globally in a risk-based approach to ensure that appropriate human rights practices are in place to address potential infringements.
- Enhance explicit references to risks and practices to combat modern slavery in our policies at an overarching Group corporate level together with establishing the processes implemented within each of our divisions.

Dive deeper into our supply chain:

- Further engagement with our suppliers to ensure the alignment of values on modern slavery practices.
- Investigate the possibility of creating a supplier survey inclusive of human rights commitments to be issued to our top tier suppliers and those considered to be in 'higher risk' industries.
- Progressively build in specific terms and conditions regarding anti-modern slavery into our supply contracts moving forward, where possible.
- If contracting with an entity deemed to deliver goods and/or services in a category considered 'higher risk', we will work with those supply partners on risk mitigation strategies.
- Identify and determine how we are going to assess effectiveness of our actions in mitigating these risks.



Other Relevant Information

We understand as a business that we must further our work to embrace community and sustainability practices across our business, in both our operations and supply chain. We are proud of the recent work we have commenced and completed to bring a more sustainable and community focused outlook to the way SeaLink operates.

These initiatives include:

RECONCILIATION

SeaLink's first Reconciliation Action Plan (RAP) was launched in 2018 to provide a framework for SeaLink Travel Group to support reconciliation and engagement with Aboriginal and Torres Strait people, employees and communities. SeaLink continues to strengthen relationships with traditional owners, Land Councils and Regional Shire Councils in remote communities including agreeing to service contracts with the Groote Eylandt Aboriginal Trust, the Anindilyakwa Land Council, the Palm Island Aboriginal Shire Council and Quandamooka Yoolooburrabee Aboriginal Corporation. With the acquisition of the Transit Systems Group, SeaLink has embarked on renewing our RAP to continue building an organisational culture that embraces and incorporates recognition, acknowledgement and understanding of Aboriginal and Torres Strait Islander peoples and culture.

Outside of the reporting period in October 2020 our Sydney bus operations also launched a Transit Systems NSW RAP focused on our depots in Sydney to continue to progress our vision for embracing, recognizing and acknowledging our Reconciliation journey for the community in which we work.

COMMUNITY

In every community where we operate, SeaLink has a bespoke local content plan to capture the needs of the community and empower our teams on the ground to take pride in the outcomes. Support for local communities primarily takes the shape of charitable donations, sponsorship support and the provision of in-kind services. SeaLink is highly aware of our responsibility to local residents and local services.

ZERO EMISSIONS

SeaLink is actively pursuing zero emissions outcomes, such as working with governments globally to replace traditional diesel vehicles with alternative solutions such as electric and hydrogen powered vehicles. We have also signed a memorandum of understanding (MOU) with an alliance of market providers to establish the H2OzBus Project. This MOU reflects our endeavours to further evaluate and demonstrate the concept of hydrogen fuel-cell electric buses for use in public transport environments.

Although the above-mentioned activities do not directly address the risks associated to modern slavery, our view is that it provides an insight into SeaLink's commitment to creating a better, more inclusive, and prosperous community.



APPROVAL

This Statement is made in accordance with the Modern Slavery Act 2018 (Cth). This Statement has been approved on 22 March 2021 by the Board of the SeaLink Travel Group Limited for itself and as the ultimate holding company of its wholly owned subsidiaries, Transit Systems Pty Ltd and Transit Systems West Pty Ltd who are also reporting entities for purposes of the Act.

Jeffrey Ellison
Chair
SeaLink Travel Group Limited

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