



Modern Slavery Statement

1 July 2022 to 30 June 2023



1.1 Reporting Entity	2
1.2 Structure, operations, and supply chains of the Busways Group.....	2
1.2.1 Structure.....	2
1.2.2 Operation.....	2
1.2.3 Supply chain	3
1.3 Risks of modern slavery practices in the operations and supply chains, and any entities the Business owns or controls	3
1.3.1 Risk in our operations	3
1.3.2 Supply chain risks	4
1.4 Actions by Busways Group to assess and address these risks, including due diligence and remediation processes.....	4
1.4.1 Modern Slavery Committee.....	4
1.4.2 Modern Slavery awareness and education	5
1.4.3 Incorporate modern slavery into our procurement policies and procedures ..	5
1.4.4 Biennial Supplier Confirmation	6
1.4.5 Modern Slavery Policy	6
1.4.6 A continuous improvement approach to mitigate potential risks within our operation and supply chain	6
1.5 How Busways Group assesses the effectiveness of these actions	7
1.6 Process of consultation within Busways Group	7
1.7 Future commitments.....	7
1.7.1 Policies and procedures.....	7
1.7.2 Training and awareness.....	8
1.7.3 Collaboration and engagement	8

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 2022 to 30 June 2023 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)
- (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)
- (j) Busways Wyong Pty Ltd (ACN 000 044 726)
- (k) Galbrock Pty Ltd (ACN 078 310 657)

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

Busways Group acknowledges it has both a legal and a moral responsibility to promote transparency in its operations. Therefore, we implement procedures specifically focused on reducing the possibility of modern slavery practices existing within our business and our supply chain.

The entities forming part of Busways Group have an annual consolidated revenue of over \$100 million in the financial year from 1 July to 30 June 2023.

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 the Rowe family, who are supported by a leadership team that oversees operations, finance, HR and administration for all entities within Busways Group.

1.2.2 Operation

Busways Group is a wholly Australian owned operation. The core business of Busways Group is to provide and operate bus passenger transportation services.

Busways Group is currently contracted by the state governments in New South Wales and South Australia to deliver bus operations. Busways Group has over 1,350 buses operating in 14 contract regions. We delivered services to 60 million passengers in FY23. Busways

Group employs over 2,800 people. The most significant proportion of our staff are bus drivers, followed by mechanics and administrative support functions.

1.2.3 Supply chain

Busways Group is wholly Australian owned, and it only provides services within Australia. As such, all Busways Group's 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 and other goods and services required to operate its bus fleet. In addition, Busways Group sources and purchases uniforms from external suppliers. For depot construction, refurbishment and maintenance projects, Busways Group engages external companies for materials and services.

A small number of suppliers, who supply specialised consultancy and technical advice to Busways Group, are based in North America.

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 strong legislation and guidance in place, the risks of our operations being directly exposed to modern slavery are low. However, Busways Group is aware that there may be indirect exposure to risks further down our supply chain.

Busways Group has strong visibility over its own employees and complies with Australian workplace laws, including the *Fair Work Act 2009* (Cth), National Employment Standards (NES), and work health and safety legislation. This visibility provides us 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. This may include workers in areas such as bus and on-premises cleaning, and catering. As part of our commitment to continual improvement, Busways Group is in the process of requesting Modern Slavery statements and commitments from these identified third-party providers.

1.3.2 Supply chain risks

Busways Group recognises that even though most of our suppliers are based in Australia, some of their products and services may be, partly or wholly, manufactured in other countries in the Asian, North American, and European regions.

Based on the Commonwealth Modern Slavery Act 2018 guidance, we have assessed and identified a small number of high-risk industries in our supply chain. Please refer to the risk assessment and mitigation plans as detailed in Table 1.

Table 1 Risk assessment and mitigation plans

Risk Sector	Geographical risk and industry sector risk	Industry sector risk
Industry	<ul style="list-style-type: none"> Rubber products Textile and uniform ICT and electronics 	<ul style="list-style-type: none"> Cleaning services Catering services Construction services
Risk profile	<p>Above industries have presented high geographic and industry risks according to the Modern Slavery Act. Often industry employs low-skilled workers and offers poor labour conditions. Slavery practices are often present in the production side of operation.</p> <p>In high-risk countries or regions, human rights have been poorly protected, and laws are inadequately enforced. For instance, forced labour is an issue in many high-risk countries and regions where individuals are held in debt bondage. Further, the potential for child labour exists in areas of high poverty.</p>	<p>Above 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 often occurs outside regular business hours or workers do not receive the legal award rate of pay, superannuation or leave entitlements. They may also be more susceptible to work-related injuries due to poor working conditions that are not adequately regulated by occupational health and safety standards.</p>
Remedial Action	<p>During the last twelve months Busways has made efforts to contact high risk suppliers to ascertain their approach to modern slavery risks. To date 50 high risk suppliers have replied and confirmed their approach to modern slavery risks. In addition, another 100 active suppliers across a range of industries have confirmed their approach.</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 is immature and therefore requires greater effort and engagement to understand.</p>	

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

During the FY23 reporting period, Busways Group has progressed further with its commitment to raising awareness and identifying and mitigating the risks of modern slavery across our business. The key achievements for FY23 are as follows:

1.4.1 Modern Slavery Committee

The Modern Slavery Committee was established in 2022, with key members from the finance, IT, HR, risk and compliance, procurement, and operations teams. The Modern

Slavery Committee holds monthly scheduled and documented meetings to share, discuss and develop plans to mitigate modern slavery risks across our operations and supply chain. The main role of the committee is as follows:

- Continual due diligence on the Busways supply chain to understand the risk level of exposure to modern slavery practices;
- Provide an avenue for whistle blowers to report concerns relating to modern slavery;
- Continually review and improve activities to ensure Busways is taking all necessary steps to combat modern slavery across the business;
- Develop and release education and awareness training to all employees to help them understand and recognise modern slavery practices;
- Develop and implement supplier code of conduct;
- Promote policies and Busways commitments to suppliers, vendors and contractors.

Busways Group understands combatting modern slavery is an ongoing process. We will utilise the Modern Slavery Committee forum to continue reviewing and monitoring areas of concern, which will lead to updates of risk assessments within our operations and supply chain.

1.4.2 Modern Slavery awareness and education

To raise awareness of modern slavery and understand its present impacts on our society, Busways Group has developed an education program for all employees. This has been rolled out to all head office staff, mechanics and cleaners. Further, this will be rolled out to all Drivers from January 2024.

These training documents outline and summarise information that will equip key staff to:

- Recognise common forms of exploitation identified in the Modern Slavery Act 2018
- Understand the facts and impacts of modern slavery in Australia and worldwide
- Understand the types of services and products consumed each day that may be the product of modern slavery practices
- Identify the warning signs of modern slavery activities
- Understand the high risk industries that we work with both in our operations and our supply chain
- Work to increase the clarity around what actions to take if modern slavery activities are suspected
- Identify our high-level requirements and obligations pertaining to the Modern Slavery Act 2018.

At the time of writing this document 74% of enrolled Busways employees (490) have completed this training. We look forward to rolling this out to our entire employee base in FY24 and driving this completion rate to 100% across the business.

1.4.3 Incorporate 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 policies and procedures. In the FY23 reporting period, we strengthened modern slavery related clauses in our Supplier Code of Conduct and Supplier Onboarding Process and have

made efforts to ensure all supplier agreements moving forward contain obligations to ensure compliance with the Modern Slavery laws. Our standards and expectations in relation to eliminating modern slavery from our supply chain have been clearly articulated in these policies.

Busways continues to actively search for an onboarding solution for new suppliers that will enable us to better monitor all of our supplier's standards and subsequently identify opportunities for improvement. Through this increased level of supplier engagement, we will aim to meet modern slavery prevention requirements within our own business operations while also assisting our suppliers to do the same.

The Modern Slavery Committee will continue to identify and assess our work practices to ensure modern slavery related clauses are properly addressed and included in all our policies and procedures, as appropriate.

1.4.4 Biennial Supplier Confirmation

Busways has launched a biennial re-assurance process for all active suppliers. 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, they need to confirm their modern slavery status and practices on a biennial basis. If responses are not submitted or not meeting Busways' requirements, then Busways reserves the right to cease working with the supplier.

1.4.5 Modern Slavery Policy

In order to support the Modern Slavery awareness strategy at Busways, the Modern Slavery Policy was developed and released in FY23. The purpose of this policy is clearly communicated as follows

- Prevent, detect and respond to the risk of Modern Slavery occurring within Busways, its supply chain or in any other business relationships;
- Demonstrate Busways commitment to only doing business with those who comply or understand the Modern Slavery Act; and
- Ensure compliance with the Modern Slavery Act at all times.

Further the policy defines Modern Slavery in all its forms and explains the role of the Modern Slavery Committee within Busways.

1.4.6 A continuous improvement approach to mitigate potential risks within our operation and supply chain

During the current reporting period, the Modern Slavery Committee continues to engage with many key stakeholders within the organisation. Further to the work completed in FY22, Busways has identified potential high-risk areas within our supply chain and risk segments continue to be analysed and once completed, further controls will be defined, and mitigation actions put in place. Please refer to Table 1.

Busways Group acknowledges that we are in the developing stage of identifying and mitigating risks of modern slavery within our operations and supply chain. It is an ongoing and collaborative process, to which we are wholly committed. Throughout FY24, Busways will continue to utilise the forum of the Modern Slavery Committee, taking a continual improvement approach in building the risk mitigation framework, strengthening policies and

completing other initiatives as identified from our work. We look forward to collaborating with more people and entities within our sphere of influence so that we may eliminate any exposure to modern slavery practices within our business and the communities in which we operate.

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. In FY22 an audit of our payroll operations was carried out and the actions to address the audit findings are currently in progress.

To ensure identified risks are properly managed and mitigation actions are correctly evaluated, Busways Group is in the process of setting up a range of methods to track the effectiveness of our controls.

In key areas, we will set measurable goals that will be monitored and evaluated over agreed timeframes, giving our Modern Slavery Committee the opportunity to review the effectiveness of our actions. These goals will include, but not be limited to:

- The number of identified high risk businesses Busways works with and mitigating actions in place
- The number of suppliers engaged through Busways supplier re-confirmation process, which includes key questions around modern slavery governance and approach
- The number of employees trained in modern slavery prevention
- The number of policies, procedures and other work practices related to modern slavery prevention that are successfully established and incorporated into the operations of Busways Group.

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 an executive/senior management group comprising representatives of Busways Group.

1.7 Future commitments

Busways Group is committed to continue working on its systems and controls to assess and manage modern slavery risks in our operations and supply chain. Action plans formulated in FY23 are:

1.7.1 Policies and procedures

To ensure our expectations in relation to mitigating the risks of modern slavery are incorporated across Busways Group's operations and supply chain, we will continue reviewing, developing, and refining modern slavery related policies, procedures and other work practices. Specifically, in FY24, our goals are as follows:

- Strengthen our modern slavery policy;
- Work towards 50% of Busways current suppliers completing and returning the new supplier form, which re-confirms their approach to modern slavery, and provides important data for enhancing our risk assessment process; and

- Identifying avenues to better partner with our suppliers to help them understand the modern slavery risks and develop ways to help us mitigate these perceived risks.

1.7.2 Training and awareness

Busways Group recognises the importance of modern slavery awareness and education. We commit to rolling our modern slavery training awareness program out to 100% of our employees. We look forward to seeing all employees take part in this program, Further, Busways has included this important program into our new employee on-boarding process which means all new employees will be required to complete this program.

1.7.3 Collaboration and engagement

Busways Group is committed to building strong and collaborative relationships with all suppliers. The next stage in our plan is to work with an external supplier to develop a more robust and user-friendly platform to check-in with all suppliers on an annual basis, and from this point, seek to understand their willingness to adopt further measures that will meet our requirements.

Throughout FY24, Busways will continue formulating how we will work with small suppliers that do not necessarily perceive the risk of modern slavery as a concern that requires their attention or engagement. In addition, Busways will continue to make contact with all high-risk suppliers and contractors to confirm their approach to modern slavery. This will help to inform Busways on how to progress with supplier engagement going forward in a positive, holistic and collaborative way.

Approval

At Busways, we are committed to the eradication of modern slavery in all its forms, within our operations and our 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', is positioned above a horizontal line.

Byron Rowe, Director

Date: 24/11/2023