

# 2021

**MODERN SLAVERY  
STATEMENT**

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**Introduction**

This statement is prepared by STP AT Pty Ltd (ACN 626 630 144) as trustee of the STP Asset Trust and STP PT Pty Ltd (ACN 626 630 153) as trustee of the STP Project Trust (together “STP Group”) for the purposes of the Modern Slavery Act 2018 (Cth) (the Act) for the year ended 30 June 2021.

The Act requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. Modern slavery involves the exploitation of human beings, and is completely unacceptable. STP Group recognises that it has a responsibility to improve our understanding of modern slavery and mitigate the risks of it occurring within our operations and supply chains.

This is STP Group’s second Modern Slavery Statement to be issued in accordance with the Act.

# About STP: structure, operations and supply chains

**Structure**

STP Group comprises the STP Asset Trust and the STP Project Trust, which along with their trustees (which are Australian proprietary companies), act as holding vehicles for a consortium of investors’ interests in the WestConnex motorway network in Sydney, New South Wales.

During the reporting period, the STP Investors comprised: Transurban (50%), AustralianSuper (20.5%), Canada Pension Plan Investment Board (20.5%) and Tawreed (9%) (**STP Investors**). STP Investors are jointly responsible for decision making in respect of STP Group.

The trustees of the STP Group trusts are registered in Sydney. However, as the STP Group is purely an investment vehicle, the trustees do not have their own offices or employees. During the reporting period, STP Group held 51% of the ownership of WestConnex. The New South Wales Government owned the remaining 49% of WestConnex.

Transurban has been appointed as operator of WestConnex and also provides general corporate services to the STP Group including tax, accounting and company secretarial services. Transurban is one of the world’s largest toll-road developers and operators, operating toll roads in Melbourne, Sydney and Brisbane, as well as in the Greater Washington area in the United States and Montreal in Canada.

Transurban is lodging its own modern slavery statement for FY21 under the Act, which will be available on its website at [www.transurban.com](http://www.transurban.com) (the **Transurban Modern Slavery Statement**). The Transurban Modern Slavery Statement details the governance and risk management processes and policies that Transurban applies in relation to its supply chains and

operations (including as they relate to STP Group and WestConnex). This STP Group Statement details the governance and risk management processes and policies that STP Group applies in relation to its own supply chains and operations.

**Operations**

STP Group’s sole operations are providing a vehicle for the STP Investors to hold their investment in WestConnex. It does not maintain offices, employ workers or undertake any significant activities in its own right.

The WestConnex motorway network is the largest road infrastructure project in Australia, linking western and south western Sydney with the city, airport and port in a 33-kilometre continuous motorway.

WestConnex, is lodging its own separate modern slavery statement for FY21 under the Act, which is attached at Appendix B (the **WCX Modern Slavery Statement**) and forms part of this Statement.

Please refer to the ‘Our structure and operations’ section on page 8 of the WCX Modern Slavery Statement for information on WestConnex’s operations, which through STP Group’s Investment in WestConnex form the material aspects of STP Group’s operations.

**Supply Chain**

During the reporting period STP Group did not procure goods or services in its own right. Rather, any goods and services relating to the operation of STP Group were procured by Transurban as a services provider to the STP Group. The nature of these services is primarily administrative and professional, reflecting that STP Group is an investment vehicle. Key categories include tax, accounting and company secretarial services.

**The STP Investors comprise**

**Transurban (50%)**

**AustralianSuper (20.5%)**

**Canada Pension Plan Investment Board (20.5%)**

**Tawreed (9%)**

# Modern slavery risks in operations and supply chains

*STP Group's principal risk exposure in relation to modern slavery practices arises in its operations, specifically in providing a vehicle for the STP Investors to hold their interests in WestConnex.*

STP Group's investment in WestConnex and exposure to WestConnex's operations and supply chains represents the primary potential area of risk for STP Group. Please refer to the specific modern slavery risks identified by WestConnex in its operations and supply chains outlined in the 'Modern Slavery Risks' section on page 14 of the WCX Modern Slavery Statement.

STP Group's supply chain, comprising the administrative and professional services provided to STP Group by Transurban, are considered by STP Group to be a lower risk area given the skilled nature of the services, the jurisdiction in which they are provided (i.e. Australia) and the governance and risk management processes adopted by Transurban.



# Our approach

*STP Group relies on the actions of WestConnex and the WestConnex operator, Transurban, to review and respond to modern slavery risks with respect to WestConnex.*

STP Group monitors and has oversight of WestConnex in its capacity as part owner of WestConnex, including through receiving and considering financial and risk reporting by WestConnex.

The actions taken by WestConnex and Transurban to assess and address WestConnex's modern slavery risks, including due diligence and remediation processes, are set out in WCX Modern Slavery Statement in the following sections:

- 'Due diligence processes' section on page 16;
- 'Remediation' section on page 18; and
- 'Training and capacity building' section on page 18.



# Measuring effectiveness

*STP Group relies on WestConnex and the WestConnex operator, Transurban, to assess the effectiveness of actions undertaken to respond to modern slavery risks with respect to WestConnex.*

The way in which WestConnex and Transurban assess the effectiveness of such actions is set out in the 'Measuring effectiveness' section on page 21 of the WCX Modern Slavery Statement. As mentioned above, STP Group monitors and has oversight of WestConnex in its capacity as part owner of WestConnex, including through receiving and considering financial and risk reporting by WestConnex.

# 07 Appendices

## Consultation

This Statement has been prepared by Transurban on behalf of STP Group, in accordance with their general corporate services arrangement and following consultation with the STP Investors and the WestConnex management team. The Statement was also circulated to the Transurban executive team, in the context of its role as operator of WestConnex, prior to it being put to the Board of the STP Group reporting entities for final review and approval.

## Approval

This Modern Slavery Statement was approved by the Board of STP AT Pty Ltd, as trustee of the STP Asset Trust, and STP PT Pty Ltd, as trustee of the STP Project Trust, on 18 October 2021.

Signed

**Scott Charlton**  
STP Group Board Chair



# Appendix A

The table below outlines out this Statement aligns to the mandatory reporting criterion under the Act:

<b>Mandatory reporting criterion</b>	<b>Reference in this statement</b>
Identify the reporting entity	• Introduction – see page 2 of this Statement
Describe the reporting entity's structure, operations and supply chains	• Appendix B – About WestConnex - see page 6 • Appendix B – Our structure and operations- see page 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	• Appendix B – Modern slavery risks - see page 14
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	• Appendix B – Our Approach- see page 16
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	• Appendix B – Measuring effectiveness - see page 21
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	• Consultation - see page 6 • Approval - see page 6
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	

# Appendix B

Please refer to the WestConnex Modern Slavery Statement on the following pages.

# 2021

## MODERN SLAVERY STATEMENT

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# Our commitment

**It is a deeply uncomfortable fact that the risk of human rights abuses—including slavery—can exist in some of the most ordinary business activities; from the goods we buy to the services and materials we use.**

Modern slavery involves the exploitation of human beings, and it is estimated 40 million people are trapped in modern slavery worldwide, with a significant proportion being children and women<sup>1</sup>.

Respecting human rights, including freedom from all forms of abuse that make up modern slavery, is a global responsibility.

However, it is important that businesses such as ours, with expansive supply chains, actively participate in initiatives aimed at eradicating modern slavery.

At WestConnex, we are continuously improving our understanding and mitigation of the risks of modern slavery occurring within our operations and supply chain.

Our values underpin the way we go about our work and how we treat those we encounter. These values—integrity, collaboration, accountability, ingenuity and respect—are at the core of how we manage our operations and interact with our suppliers.

Last year, we published our first Modern Slavery Statement. This year's statement builds on this foundation and outlines the initiatives we have progressed to meet our objectives, including strengthened key policies, additional training for our people, and sharing knowledge with our partners and peers.

While we did not identify any instances of modern slavery in our operations or supply chain in FY21, we acknowledge that we must remain vigilant and we plan to continue to evolve our approach to monitoring for these risks in the future.

We look forward to continuing to expand the work we have done so far, while sharing knowledge among our industry partners to continue to protect human rights.

**Andrew Head**  
Chief Executive Officer

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## Our broader sustainability efforts

Further information on our broader approach to our community and sustainability is available on [transurban.com](https://www.transurban.com)

- This includes the Transurban:**
- [FY21 Corporate Report](#)
  - [FY21 Corporate Governance](#)
  - [FY21 Sustainability Supplement](#)
  - [Innovate Reconciliation Action Plan](#)
  - [Financial Inclusion Action Plan](#)

## WestConnex reporting entities under the Act

This statement is prepared for the purposes of the Modern Slavery Act 2018 (Cth) (Act). This is a joint statement by each of the reporting entities under the Act within the WestConnex Group as defined in Appendix A.

For the purposes of this statement, 'WestConnex' collectively refers to the WestConnex entities as defined in Appendix A. 'Transurban' collectively refers to the Transurban Group, as defined in Appendix A.

During the course of FY21, the Transurban Sustainable Procurement Program (the Program) was deployed across WestConnex, and is being managed by the Transurban-led Procurement team. Transurban will be lodging its own separate modern slavery statement under the Act. As a result, there is a substantial amount of overlap across each of these statements. Statistics and data presented in this statement will only include those businesses related to WestConnex, unless otherwise stated.

<sup>1</sup> International Labour Organisation, [ilo.org/global/topics/forced-labour/lang-en/index.html](https://ilo.org/global/topics/forced-labour/lang-en/index.html)

# FY21 in review

- In FY21, WestConnex did not identify any instances of modern slavery in our operations or supply chain. We acknowledge that this does not mean modern slavery was not present, and that we are still evolving our ability to identify modern slavery instances in our operations and supply chain.
- More than 99% of our direct spend with Tier 1 suppliers is located locally in Australia
- The majority of our direct Tier 1 procurement spend is on services rather than goods
- We are increasingly integrating sustainability into all aspects of our business strategy, planning, operations and supply chain management activities and are making meaningful contributions to the UN Sustainable Development Goals (SDGs). Assessing and addressing our human rights impact and modern slavery risks is an important part of this work

Modern slavery involves the exploitation of human beings, and WestConnex recognises that we have a responsibility to respect human rights including freedom from all forms of abuse that make up modern slavery. As part of this responsibility, we are continuously improving our understanding and mitigation of the risks of modern slavery occurring within our operations and supply chain, and during FY21, WestConnex progressed a number of initiatives to meet these objectives.

These initiatives support our broader approach to managing sustainability, which is aligned to the SDGs. This is our second Modern Slavery Statement published in accordance with the Act, and builds upon the foundation that was reported in our FY20 Modern Slavery Statement.

Key activities for FY21 included:

### Policies and procedures

- Reviewed, refreshed and strengthened key policies and procedures including our Supply Chain Modern Slavery Remediation Guidelines, as well as establishing our Human Rights Policy (see page 16)
- Implemented additional controls to guide how low value purchases are managed for categories of goods and services that are potentially high-risk for modern slavery

### Contractual terms

- Continued to refine and update our supplier requirements and contractual provisions relating to modern slavery for a new generation of standard clauses in supply contracts for goods and services, which are classified as potentially higher risk for modern slavery (see page 17)

### Risk identification

- Continued to evolve the way we identify and assess risks. For example, by looking at the latest information available on key commodities, sectors, industries, geographical areas and specific organisations (see page 15)

### Reporting

- Published our inaugural Modern Slavery Statement for FY20 and sought feedback on this statement from relevant stakeholders

### Training and awareness raising

- Expanded training on modern slavery to employees to improve their ability to identify and respond to modern slavery risks
- Held detailed workshops with all Procurement sourcing employees, contract managers and a number of key suppliers, including participating in a pilot project with the Transurban operations and incident response team on the Cross City Tunnel in Sydney (see page 11)

### Industry collaboration

- Continued to actively participate in numerous multi-stakeholder forums with suppliers as well as industry leaders and peers to share learnings and knowledge
- Continued to expand our joint industry-based initiatives to avoid taking a fragmented approach to our Sustainable Procurement Program (see page 12)

## Program timeline



# About WestConnex

03

operating assets

02

projects in delivery

M5  
West<sup>2</sup>

to be part of the WestConnex  
network when the current  
concession expires in 2026

WestConnex is the largest road infrastructure project in Australia, linking western and south western Sydney with the city, airport and port in a 33-kilometre continuous motorway.

WestConnex also links Greater Sydney to major international gateways at Sydney Airport and Port Botany, and the future Western Harbour Tunnel, Beaches Link and M6 extension.

On 31 August 2018, the NSW Government announced a 51 per cent stake in Sydney Motorway Corporation was awarded to Sydney Transport

Partners (STP PT Pty Ltd) - a consortium led by Transurban STP Project Co Pty Ltd. On 20 September 2021, the NSW Government announced that Sydney Transport Partners was the successful bidder for the remaining 49% stake in WestConnex.

Our purpose - to strengthen communities through transport - underpins all that we do, from designing and building new roads to supporting community initiatives in the neighbourhoods where we operate.

We continually challenge ourselves in the way we respond to social and environmental issues, and invest in both to create social inclusion and manage our environmental impacts.

Further details about WestConnex, including details about its executive team and its assets can be found at our website at [westconnex.com.au](http://westconnex.com.au)

## Key benefits of WestConnex include:



Improving motorway access and connections to western Sydney and key employment hubs across the city



Moving traffic and heavy vehicles to the underground motorway



Reducing traffic on local streets and creating opportunities for urban renewal

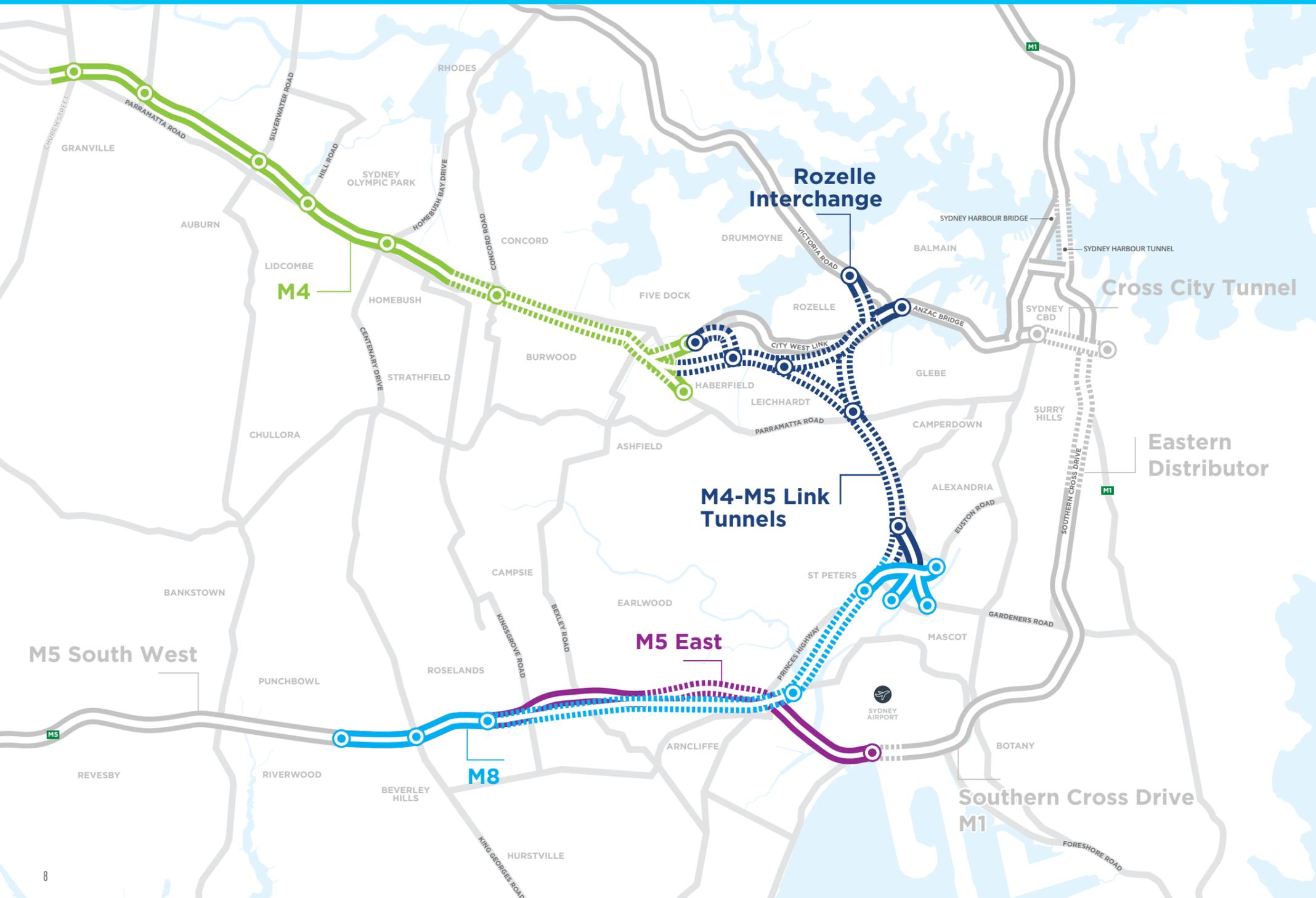


Providing more green space than any other urban road project in Australia, up to 18 hectares of open space and around 23-kilometres of new and improved cycle-ways and walkways



<sup>2</sup> Transurban currently owns 100% of M5 West, when the current concession expires in December 2026 the M5 West will form part of the WestConnex network with the concession through to December 2060

# Our structure and operations



M4	49% NSW Government 25.5% Transurban 10.455% AustralianSuper 10.455% CPPIB 4.59% Tawreed
M5 East	49% NSW Government 25.5% Transurban 10.455% AustralianSuper 10.455% CPPIB 4.59% Tawreed
M8	49% NSW Government 25.5% Transurban 10.455% AustralianSuper 10.455% CPPIB 4.59% Tawreed
M4-M5 Link Tunnels	49% NSW Government 25.5% Transurban 10.455% AustralianSuper 10.455% CPPIB 4.59% Tawreed
Rozelle Interchange <sup>3</sup>	49% NSW Government 25.5% Transurban 10.455% AustralianSuper 10.455% CPPIB 4.59% Tawreed
Project	

<sup>3</sup> Rozelle Interchange is being delivered and funded by Transport for NSW

# Our structure and operations

(Continued)

**WestConnex's workforce is made up of over 130 employees in Australia working directly on the project.**

Our people are involved in a broad range of activities ranging from toll road operations and maintenance and major road project delivery through to head office functions including Technology, Finance, Corporate Affairs and People and Culture.

 Further details of WestConnex, including our roads and projects can be found at our website at [westconnex.com.au](http://westconnex.com.au) or in the [Transurban FY21 Corporate Report](#).

The processes and practices that WestConnex applies with respect to managing modern slavery risks in our workforce form part of our overarching risk management program and are subject to the oversight of the WestConnex Boards and their Committees.

Our Code of Conduct and values articulate the behaviour expected of WestConnex's Directors, Senior Executives and employees. The Code

and policies, such as Ethical Business Practices, set out clear expectations with respect to human rights. These policies are supported by documented processes for the management of complaints and grievances and we have an independent whistleblower service should employees wish to report policy breaches confidentially. These policies and procedures are reviewed regularly, and material breaches of policy are reported to the relevant group Board for the business.

In Australia, employment conditions are covered by the National Employment Standards (NES) which set out the 10 minimum employment entitlements that must be provided to all employees.

In addition, over 49% of our employees are covered by Modern Awards or internal Enterprise Agreements, which set minimum pay and conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the NES.

We undertake annual reviews of the Modern Awards and employment contracts to confirm our workers' entitlements are being met. We also undertake regular internal and external audits of payroll. In addition, WestConnex does not engage in external lending activities.

—Case study—

## Road operations

**In FY20, we formed a cross-regional operations working group with Transurban, to identify risks including the potential for modern slavery to occur within our operations (for example, the risk that human traffickers may use our toll roads as part of their wider operations).**

This group decided that the best approach was to undertake and monitor a pilot program on one motorway, aimed at training and supporting our people on how to better respond if they suspected that such a situation was occurring and then take lessons from this exercise to our other operations as appropriate.

In FY21, the Cross City Tunnel (CCT) in Sydney was selected as the motorway to commence our pilot. Anti-Slavery

Australia, an Australian leader in the anti-slavery movement, was appointed as our delivery partner.

To date we have completed an initial management awareness and protocol workshop, and will continue to monitor and learn from this pilot over the longer term.

**“We are proud to partner with Transurban to co-design a unique modern slavery training program, created through close consultation with the working group. The program is an Australian first, with the aim of identifying and responding to the risk of modern slavery on motorways through real world examples and case studies.”**

—Professor Jennifer Burn, Anti-Slavery Australia



# Our supply chain

Over \$0.99B in annual managed spend and 150+ direct suppliers

With three assets and two projects in delivery, WestConnex is in a strong position to make long-term improvements to the way we design, construct, operate and maintain our roads. To do this, we rely on a diverse range of suppliers, from large global multinational construction contractors to small local businesses.

Major project construction, incident response and maintenance and facilities management for our offices are among services that are outsourced on long-term contracts with critical supply chain partners. Our Tier 1 supply chain profile is heavily weighted towards the purchase of services, rather than direct goods or materials, which then form part of our extended supply chain.

Approximately 99.9% of our annual spend sits with suppliers whose direct trading site or headquarters are located locally in Australia.

Our top supplier categories for FY21, which constituted over 75% of our total spend were:

- **Major project construction services**—design and construction of new or enhanced roads to improve connections within cities and to help people get where they need to be. Typically, WestConnex will select a lead Design & Construction (D&C) subcontractor (or consortium) for each project, who will then manage delivery, including appointing subcontractors as necessary.
- **General consulting services**—provision of a variety of corporate management consulting services, which are predominantly desktop based.

- **Operations and maintenance services**—provision of ongoing works on our road assets to manage safety and operating standards in line with regulations and our concession deed requirements. Typically, we will select an Incident Response and Maintenance service provider for each motorway, who will then tailor the delivery of various services including items such as civil, mechanical, electrical works as well as incident response services. This service provision may include appointing subcontractors as necessary.

## Procurement team

Procurement at WestConnex is integrated with the wider Procurement team from Transurban, who are charged with wide-ranging responsibilities including category management, strategic sourcing, procurement operations, the Transurban Sustainable Procurement Program and contract management framework, as well as supporting strategic corporate supplier relationships. This team has local personnel based in Sydney, but reports into a central management team based out of Transurban headquarters in Melbourne, Australia.

## Sustainable Procurement Program

The Transurban Program was formally established at WestConnex in FY20 and focuses on the economic, social and environmental lifecycle impacts of our supply chain, including human rights issues.

The Program is aligned to the International Guidance Standard on Sustainable Procurement (ISO 20400:2017) and Transurban's sustainability approach, which aligns with the SDGs. This Program is managed by a dedicated Sustainable Procurement Manager. Further information on the governance of this program is contained in the 'Our approach' section on [page 16](#).

—Case study—

## Promotional items

Promotional items have been identified as a potential high-risk category through our risk assessment process.

These items typically cover a range of low-cost branded goods that are given away to employees, customers or stakeholders to promote the organisation including items such as T-shirts and caps. The use of imported textiles in particular carries labour rights risks including issues such as unreasonable work expectations, unsafe working conditions and fears around visa status.

As outlined in our FY20 statement, the IVE Group was selected as our national preferred supplier in

Australia for promotional items due to the program they have instituted to manage labour rights risks. IVE is a member of SEDEX (one of the world's leading ethical trade service providers), and is ISO 9001 (Quality Management Systems) and ISO 14001 (Environmental Management System) certified. IVE's suppliers comply with SA 8000 (Social Accountability) (or equivalent) certification and it conducts regular factory audits (both with internal and external resources).

In FY21, we implemented additional controls to guide how low value purchases are managed for categories of goods and services that are considered potentially higher risk categories for modern slavery. As part of this process, we analysed our spend on promotional items throughout the year (including corporate credit purchases). We found a high adherence with the use of IVE group as a preferred supplier, and alternative suppliers were

only being used on rare occasions as a secondary option. We held a dedicated workshop with our employees who would typically purchase these items to delve deeper into the risks surrounding Modern Slavery. Issues discussed included the reason why the IVE Group has been selected as our preferred supplier, the level of due diligence required for any alternate supply options, and what opportunities were available for further improving our practices to address risks in this category.

**“Modern slavery isn't the first thing that springs to mind when you're organising promotional t-shirts or showbags. But it's extremely important to get right. The training was clear and concise, and helped our team understand how to minimise risks.”**

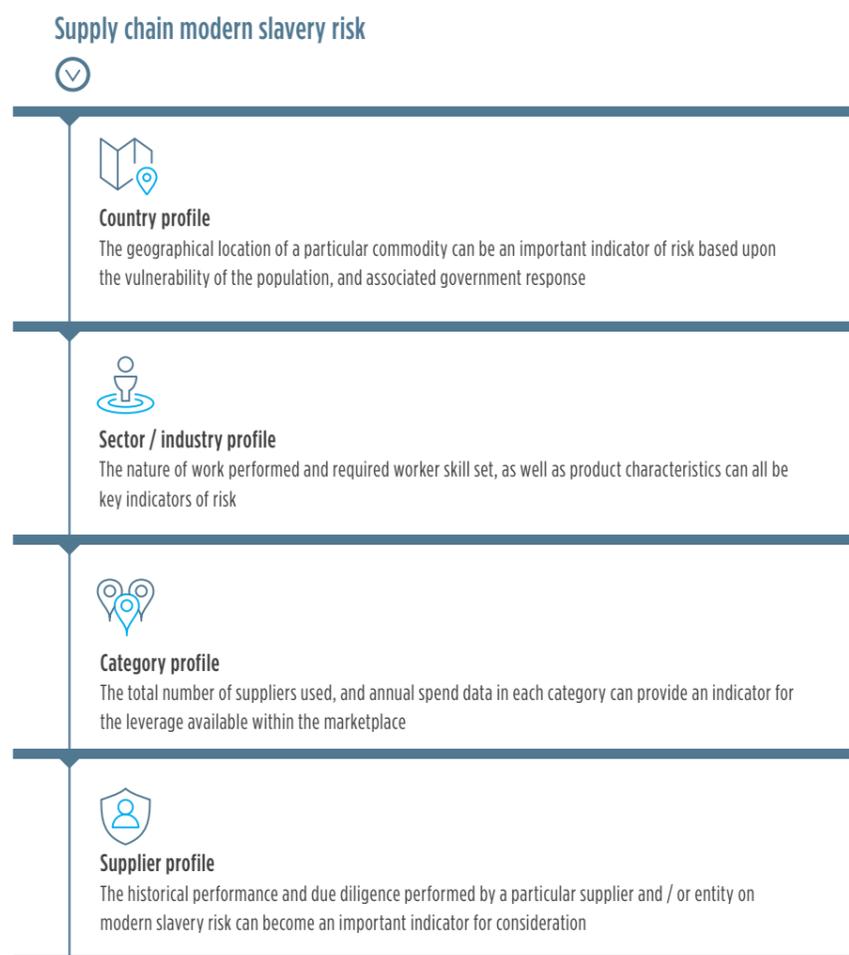
—Margie Dimech,  
Corporate Communications Manager



# Modern slavery risks

We have a responsibility to take steps to identify the risks of modern slavery within our operations and supply chain. In FY21 we continued to refine the way we identify these risks and have expanded our set of due diligence processes across WestConnex.

Figure 1: Risk indicators



## Key outcomes

In FY21, Transurban did not identify any instances of modern slavery in our operations or supply chain. We acknowledge that this does not mean modern slavery was not present, and that we are still evolving our ability to identify modern slavery instances in our operations and supply chain.

## Risk assessment

Our risk assessment processes align with WestConnex’s Enterprise Risk Management framework and the ISO 20400 guidelines. However, we also recognise the need for a broader view when assessing human rights, including modern slavery risks, and have considered the continuum of conduct approach outlined in the UN Guiding Principles on Business and Human Rights as suggested by the Guidance for Reporting Entities issued by the Federal Government for the Act. This continuum of conduct approach explains how a company may cause, contribute to or be directly linked to modern slavery.

### Operations

We have assessed our direct workforce as being of low risk to modern slavery and believe our internal policies and practices further mitigate this risk.

We have also put in place various policies and processes (see ‘Our approach’ section on page 16) to help mitigate potential modern slavery risks relating to our broader operations. This includes continuing our cross-regional operations working group, which seeks to identify risks such as the broader potential for modern slavery to occur on our motorways (see operations pilot case study on page 11).

### Supply chain

We consider that our greatest risk of involvement in modern slavery is being directly linked to it through our supplier relationships. Therefore, our modern slavery work has focused primarily on our supply chain.

Given the size and complexity of our supply chain, the focus for our Program in FY21 has been on direct Tier 1 suppliers. We are continuing to build our understanding of our supply chain beyond tier 1, with an initial focus on our higher risk categories, which will inform future risk mitigation actions (for example, see case study on progress with ISCA coalition on page 23).

In FY21, we have continued to draw upon a combination of the following external resources to better explore our potential supply chain risks by looking at key commodities, sectors, industries, geographical areas and specific organisations. These include:

- [Global Slavery Index 2018](#)
- [U.S. Department of Labor’s 2020 List of Goods produced by Child Labor or Forced Labor](#)
- [Baptist World Aid Australia 2016 Electronic Industry Trends](#)
- [Responsible Construction Leadership Group Modern Slavery in Construction report](#)
- [Online Register for Modern Slavery Statements](#) (to view certain supplier submissions online)
- Various public articles, including media
- Any relevant information submitted to our independent whistleblower service.

Information submitted from suppliers in line with standard response schedules issued by Procurement during sourcing events was also used. This included a review of annual spend against each commodity and supplier to better assess our ability to leverage and influence changes in the market within the categories considered potentially higher risk for modern slavery.

### Identification process

We assess these risks through a series of workshops which have been running annually since FY18, and which were also undertaken in FY21. The following indicators were the primary source used to identify and assess actual and potential supplier risk.

## Risk indicators

To identify areas of highest risk within our supply chain, we considered the adjacent risk indicators for the potential occurrence of modern slavery.

As part of our risk assessment process, which was refreshed in FY21, we determined that 17 categories ranging across areas linked to technology, infrastructure, major project construction and corporate services, were potentially of higher risk. As a result of our risk assessment processes, the following categories continued to be prioritised through FY21:

- **Onsite cleaning services**—onsite cleaning services have been prioritised due to the complexity of the market, nature of the labour force, and historical operational practices in the industry (see case study on page 19).
- **Major project construction materials**—major project construction materials have been prioritised as many materials used in construction (including those that have been imported) can also involve significant modern slavery risks (see case study on page 23).
- **Promotional items**—promotional items (the majority of which are imported) have been prioritised as external reports have consistently outlined that the labour force in industries such as textiles, including those harvesting and processing raw materials, are vulnerable to modern slavery (see case study on page 13).

Learnings from these areas continue to support future expansion of our efforts into other categories as part of our continuous improvement approach.



# Our approach

## Governance

As part of our established Governance protocol, each of the Reporting Entities (as defined in Appendix A) is overseen by the WestConnex Boards with direct responsibility for the relevant Reporting Entity. The Transurban Procurement team is responsible for operational management of the Sustainable Procurement Program. During FY21, the WestConnex Boards and the Transurban Executive Committee (including the CEO of WestConnex) received progress updates on the Program.

We have also continued our internal working group to support and expand this Program with senior representatives from departments including Procurement, Sustainability, Corporate Affairs, Risk and Legal.

### Policy foundation

Consistent application of policies and procedures across our operations and supply chains is also key in our approach to managing the risks of modern slavery.

Our employee [Code of Conduct](#) establishes not only base principles linked to our core values, but also encourages our people to seek continuous improvement and challenge themselves to find better ways of working. Our aim is

to create an environment where everyone is treated respectfully and encouraged to fulfil their potential. WestConnex uses a 'continuous listening' platform and approach, which enables management to engage more regularly with their staff to better understand what is important to them.

In addition to the [Code of Conduct](#), the following policies and codes set our clear expectations to respect human rights, including in relation to modern slavery:

- [Sustainability Policy](#)
- [Supplier Sustainability Code of Practice](#) - applies to all new and existing suppliers, outlines both our minimum and leadership standards (including human rights), and encourages suppliers to go beyond legal compliance in order to advance their social and environmental responsibility
- [Whistleblower Policy](#)
- [Diversity Policy](#)
- [Human Rights Policy](#)
- [Privacy Policy](#)
- Ethical Business Practices Policy (internal only)
- Procurement Policy (internal only) - this policy commits the company to advance alignment with ISO 20400, and to include sustainability considerations in the sourcing process (including human rights).

We continue to regularly review and update these policies as required. We also have a number of other avenues to gather further information and document our decision-making processes, especially with regards to supply chain sourcing decisions (see 'Due diligence processes' section below).

## Due diligence processes

Our due diligence processes assess and respond to human rights risks including in relation to modern slavery. With a dedicated Sustainable Procurement Manager role in place, our aim is to bring consistency to our approach when assessing these risks and developing an appropriate response. Our key due diligence activities include:

### Sourcing toolkit and assessment

Sustainable Procurement practices are built into our standard approach each time a sourcing lead from the Procurement team is involved. Considerations such as human rights risks, including modern slavery, form part of our business process at each

stage from inception of our sourcing strategy through to execution of final contracts. For example, the sourcing team will typically get involved with sourcing transactions with a spend over a certain threshold, and issue the tenderers with a self-assessment questionnaire, which will include sections covering Sustainable Procurement. The response tabled by the tenderer will form part of the evaluation process, and the sourcing lead can also engage with the Sustainable Procurement Manager to allow for a consistent approach to be followed.

Where a particular commodity or supplier is determined to be potentially higher risk for modern slavery, additional assessment and supplier engagement is expected to be carried out as a way of further understanding our risks and driving positive change through our supply chain (see case study on [page 19](#)). In addition, during FY21 we implemented additional controls to guide low value purchases for potentially higher risk categories of goods and services for modern slavery. This was managed through the development of internal analytics tools to interrogate low value Purchase Order and corporate credit card spend data. We will keep these items under review for future periods in line with our continuous improvement approach.

### Contractual clauses

We have continued to refine and update our standard contractual clauses to be used in new supplier contracts for categories of goods and services classified as potentially higher risk for modern slavery (as identified through our risk assessment processes outlined on [page 14](#)). These clauses clearly set out our expectations for the supplier to use all reasonable endeavours to prevent and respond to modern slavery in its own supply chain and activities. We understand that continued engagement with our suppliers is important to learn more about their practices to meaningfully address their modern slavery risks.

### Ethical business practices

We recognise that modern slavery can include a range of exploitative human rights practices, and that it may also be connected to other serious criminal activity such as fraud, bribery and corruption. WestConnex has an Ethical Business Practices Policy that supports its governance and integrity framework. This policy defines the standard required from employees and third parties when working with WestConnex and highlights the processes for prevention, detection and the investigation of reports of fraudulent or corrupt conduct (including those related to modern slavery).

-  Governance
-  Due diligence processes
-  Remediation processes
-  Training and capacity building

# Our approach

(Continued)

The policy and related frameworks are supported and reinforced by formal training and awareness programs across the business (discussed further below) and proportionate disciplinary action if breached. All material breaches of this policy are reported to the group board for the relevant business.

## Remediation processes

We recognise the importance of remediation in line with UN Guiding Principles on Business and Human Rights. Where we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for or cooperating in its remediation through legitimate processes. For example, Transurban may exercise any contractual or other legal rights available to it to address any adverse human rights actions or incidents in which we may be involved, including in relation to any issues concerning modern slavery. Key processes that we continued to support remediation activity in FY21 include:

### Independent grievance mechanism for reporting potential issues

Our independent external whistleblowing hotline service is available for anyone to use, including employees, customers and members of our supply chain to raise issues including those related to fraud, conflicts of interest, bribery, corruption and modern slavery. It can be accessed via a toll-free hotline telephone number, online or by web-based access or post. An external report may be made anonymously, if desired, using any of these methods. In FY21, we continued to expand our communications around the availability of this service to our onsite cleaning contractors (see case study on [page 19](#)),

and held a meeting with our external provider to assess their ability and training to process potential cases related to modern slavery.

### Remediation guidelines

During FY20, Transurban developed a set of remediation guidelines which can be implemented at WestConnex in the event that human rights violations are found in the supply chain. During FY21, we continued to refine our remediation guidelines to help our staff take appropriate steps, if modern slavery practices are identified in our supply chain. We recognise that these issues can be complex and sensitive to navigate, so these guidelines are designed to prioritise the protection and support of identified victims. The guidelines include making sure that we clearly log the issue, allocate responsibility for investigations with appropriate timelines and define protocols for handling business relationships with suppliers in accordance with our contractual rights, up to and including the complete termination of the relationship and referral to the appropriate authorities. The guidelines are available on our intranet for all employees and are intended to be improved and developed as required.

## Training and capacity building

Awareness raising, training and capacity building are important for both our employees and our supplier partners to be better equipped to identify and respond to modern slavery risks. During FY21, all WestConnex employees completed mandatory online training on our Ethical Business Practices and Whistleblower policies, which raise awareness on how to identify instances of modern slavery. In addition, an annual Code of Conduct attestation process

was introduced so that employees continue to understand their obligations in relation to the Code of Conduct and any changes made as part of our annual review process.

We also expanded our mandatory training on modern slavery to cover all employees. This additional training covered:

- key risks surrounding modern slavery
- stories from survivors of modern slavery
- information on how modern slavery can be embedded deep within the extended supply chain
- key policies governing our approach to these risks
- signs to watch out for that may indicate the presence of modern slavery
- who to contact for further assistance via a dedicated and monitored internal communication channel (in addition to our independent whistleblower service).

Detailed training workshops on modern slavery, and key requirements under the Act were also held for all Procurement and several key contract managers as part of our wider Program.

In addition, the Sustainable Procurement Manager held workshops with key representatives from across our supplier base (and wider industry groups), to build our respective working knowledge and capacity to address modern slavery risks. We believe that a key aspect of any successful approach requires us to work closely with like-minded industry partners to avoid taking a fragmented approach to the market (see multi-stakeholder engagement on [page 23](#)).

—Case study—

## Onsite cleaning services

Onsite cleaning services have been identified as a high-risk category through our risk assessment process.

The cleaning industry is known for its susceptibility to labour exploitation and other forms of modern slavery. WestConnex currently operates offices across six locations, with approximately 12 cleaners engaged daily both as a direct service (Tier 1), or indirect (Tier 2) service through our office landlord and our Incident Response and Maintenance provider.

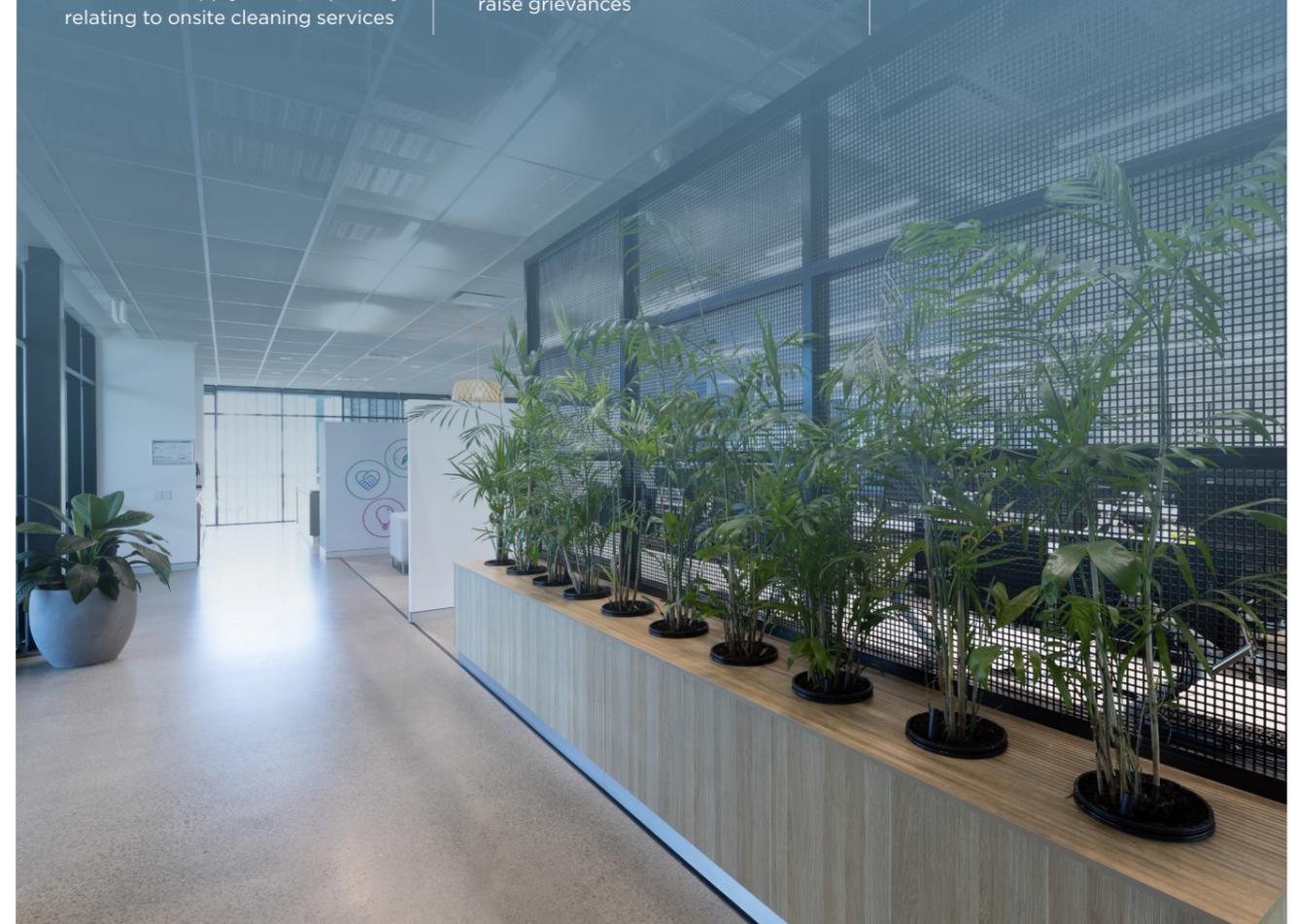
Through the course of FY21, the following processes were applied with our onsite cleaning service providers:

- We continued to engage with various industry peers to learn more about their practices in managing modern slavery risks within their supply chain, especially relating to onsite cleaning services

- We conducted a cleaning tender with a heavy focus on practices to manage modern slavery risks throughout the tendering process, up to and including contract award
- We engaged with our cleaning service providers and asked them to complete our self-assessment questionnaire, including conducting interviews with key personnel, to gain a better understanding of their practices to address modern slavery risks. In particular, we placed an emphasis on gaining a better understanding of their recruitment and subcontracting practices, verification processes to manage the correct payment of wages, and the ability of their staff to raise grievances

- We collaborated with our onsite cleaning suppliers throughout the year to give them a better understanding of our expectations, and build stronger relationships for further improvement in our processes in the future
- We installed posters within our onsite cleaner cupboards across our corporate facilities, to remind cleaning workers that they have the ability to access the independent Whistleblower service if they wished to raise a concern.

Throughout the course of FY21, we found varying levels of maturity with each supplier on their ability to proactively manage modern slavery risks based on their size, location and jurisdiction. We believe that the efforts undertaken this year will set a good foundation for further learning and improvement to better manage risks in this category.



# Response to COVID-19

Like most businesses, WestConnex continued to be impacted by the COVID-19 pandemic throughout the course of FY21.

As a long-term operator of critical road infrastructure, we operated our road networks and major projects through the period and in accordance with government mandated restrictions. We continue to have a range of work options available to all employees when they need, including flexible working hours or job share arrangements. We are proud of our workspaces that are designed to foster collaboration and welcomed

our people back to the workplace as circumstances permitted across our markets.

Transurban was able to continue the majority of its modern slavery workshops and working group sessions through a blend of face-to-face meetings and online forums as appropriate. However, we were unable to complete a face to face workshop with our traffic control room operators and crew members from the Incident Response team at our Cross City Tunnel (CCT) office due to the pandemic related restrictions in Sydney in June 2021 (see CCT operations pilot case study on [page 11](#)). Our plan is to complete this workshop in FY22 once restrictions have been lifted.

WestConnex was also able to keep working closely with our existing suppliers to manage potential supply

chain risks with the aim of maintaining our human rights requirements through our Supplier Sustainability Code of Practice and contract clauses. We recognised the significant financial impact to our small business suppliers and completed our temporary program to expedite payments to our small business suppliers and reduced our standard payment terms from 30 to 14 days. During FY21, expedited payments were made to more than 50 suppliers.

As noted in our FY20 statement, we were unable to place physical posters promoting our whistleblower service across our offices last year although these details continue to be available on Transurban's intranet and external website. This activity was successfully completed in FY21, and posters are now present across our corporate facilities in locations that are readily visible to onsite cleaning staff.



# Measuring effectiveness

WestConnex regularly assesses the effectiveness of our actions to address modern slavery and uses feedback to refine our Program.

We seek and receive feedback from both internal and external sources including employees, suppliers, investors, industry groups, external specialist consultants and NGOs. During FY21 we have continued to evolve and mature our processes to measure the impact and effectiveness of our

efforts using the following metrics. In particular, our learnings have focused on expanding our collaboration with suppliers to better understand and work with their extended supply chain (beyond Tier 1), and continuing to refine our key processes around effective grievance mechanisms.

Workstream	Activity	Performance Indicators
<b>Governance</b>	Reviews of Policies related to human rights	Policy reviews completed per annum
	High-risk category contracts with modern slavery provisions	% of contracts with provisions for categories of goods and services considered high-risk for modern slavery
	Internal audit on controls	Completion of internal audit actions that relate to our approach to assessing and addressing modern slavery risks
	Internal and Cross-Regional working groups	Number of meetings per annum for working groups
	Procurement KPI's to address modern slavery risks	Performance rating against annual KPI
	Integration of modern slavery considerations into sourcing practices managed directly by the Procurement team	Mandatory supplier self-assessment questions including in relation to human rights including modern slavery used in all sourcing activity managed directly by the Procurement team per annum
<b>Risk Management</b>	Risk assessment	Number of human rights including modern slavery Risk reviews completed per annum
	Risk register tracking	Number of Risk register reviews regarding modern slavery completed per annum
	Testing our approach with the UN Global Compact and ISCA Coalition membership, NGO's and Investors	Number of collaborations and investor engagements that included modern slavery per annum
<b>Monitoring</b>	Issues raised through our grievance mechanisms	% of substantiated issues investigated and remediated per annum
	Employee "Our Voice" survey. We conduct an annual employee opinion survey to gather feedback around confidence in leadership, our customer focus, commitment to diversity and inclusion, and more.	"Our Voice" survey results

We plan to continue to assess the effectiveness of these metrics, identify gaps, and incorporate changes in line with our continuous improvement approach.

—Case study—

## Engagement with key investors

**AustralianSuper manages more than AUD225 billion of members' retirement savings on behalf of more than 2.4 million members from around 350,000 businesses as at June 30 2021.**

One in 10 working Australians are a member of AustralianSuper, the nation's largest superannuation fund. In addition, AustralianSuper believes investing in companies with good Environmental, Social and Governance (ESG) management provides better long-term returns for members. AustralianSuper is a co-investor with Transurban in Chesapeake (USA), Transurban Queensland and WestConnex toll road assets.

AustralianSuper's ESG and Stewardship team began engaging closely with Transurban on its Sustainable Procurement Program in 2018, as part of their regular ESG review of Transurban's

sustainability practices. AustralianSuper representatives sit on the Boards of the entities in which they have co-invested in alongside Transurban, which allows them to oversee the Program as part of our governance processes. Transurban management regularly shared detailed presentations and updates to AustralianSuper representatives over this time period (including during the FY21 financial year).

This close level of engagement with key subject matter experts from AustralianSuper has helped us to shape and direct our approach from the early origins of the Program, including our work to address modern slavery. AustralianSuper has the benefit of overseeing numerous programs within its portfolio companies, and thus are in the position to share valuable insights about best practice and areas for improvement, which they have consistently done throughout our engagements. As an example, on-site cleaning services were a topic of detailed discussion, as it was identified as a high-risk category for both organisations. Further information on the work that we have conducted to better address our risks around cleaning services can be found on [page 19](#). In addition, Transurban requested the AustralianSuper ESG and Stewardship team review early drafts of both our

FY20 and FY21 Modern Slavery Statements, which allowed us to obtain independent feedback on the content and approach outlined within our documentation.

We believe that this engagement has served to make our Program far more robust and effective and will provide long term value to both parties. It also provides AustralianSuper with deeper transparency into our work and an ability to influence our direction to achieve increased ESG performance and deliver better investment outcomes for members.

**“As a super fund investing on behalf of members, AustralianSuper understands the importance of addressing modern slavery risk in our investee companies and assets. Our engagement with Transurban has provided invaluable insights into the company's approach to managing and reporting its modern slavery risks. Garnering and sharing insights from assets across our portfolio helps us develop best practice approaches and a consistent framework to identifying and mitigating slavery risk in the Fund's investments.”**  
—AustralianSuper



# Multi-stakeholder engagement

**We contribute towards modern slavery policy development and collaborate on activities<sup>4</sup>.**

During FY21 our representatives regularly participated in industry initiatives to share knowledge and learn from each other. We also undertook joint initiatives with industry groups to drive stronger and more coordinated outcomes across the community.

Key activities progressed during FY21 include:

- Actively participated in multi-stakeholder sessions to discuss human rights issues, including modern slavery, including the UN Global Compact Network Australia's (GCNA) Modern Slavery Community of Practice.
- Participated in the UN GCNA Effective Modern Slavery Grievance Mechanisms workshop
- Engaged with Anti-Slavery Australia to help develop a pilot program for our operations and Incident Response crews - [see page 11](#)
- Partnered with ISCA to continue the Modern Slavery Road Construction Industry Coalition. Although the construction industry has been impacted by government mandated restrictions in response to the COVID-19 pandemic, the Coalition has continued to meet regularly throughout this period (see ISCA coalition case study on [page 23](#))
- Supported research being conducted by Monash University and Independent Research Consultant, Heather Moore into the development of an effective modern slavery remediation model for Australian businesses

<sup>4</sup> All external engagement initiatives are conducted having regard to applicable laws, including the Competition and Consumer Act 2010 (Cth)

—Case study—

## Major project construction materials

**Major project construction services were identified as a high-risk category through our risk assessment process.**

During the reporting period, we worked collaboratively with key business peers to strengthen our response to modern slavery through the Infrastructure Sustainability Council of Australia (ISCA) Road Sector Modern Slavery Coalition. The Coalition was established by ISCA in 2019 to support businesses to assess and address modern slavery risks in the road infrastructure sector and focuses on: supporting collaborative solutions to modern slavery risk management; driving industry good

practice to support compliance with the Act; and building members' capacity to manage modern slavery risks. As part of its work programme over 2020/21, the Coalition identified and engaged with two pilot supply chains, PPE and bitumen, in order to understand potential modern slavery risks associated with the procurement of these products.

**“It is the right time for the road infrastructure industry to be proactive as well as look for collaborative solutions. With significant growth in the Australian road infrastructure sector, the recent modern slavery legislation as well as increasing expectations from external stakeholders — including investors, customers and civil society— companies in the road sector need to be able to know and show that they are managing their modern slavery risks.”**  
—Independent Chair Vanessa Zimmerman



# Approval

## Consultation

The entities comprising WestConnex have a common Procurement management team. During FY21, management presented to the WestConnex Boards on the status of relevant Procurement practices and the preparation of the Modern Slavery Statement under the Act.

This Modern Slavery Statement has also been reviewed by executive representatives from WestConnex, prior to being put to the WestConnex Boards for review and final approval.

This joint Modern Slavery Statement was approved on 19th October 2021, by each of the Board of Directors of WCX AHT Pty Ltd ACN 625 890 708 and WCX PHT Pty Ltd ACN 625 890 744 (together "WestConnex Boards" as the 'higher entity' for the reporting entities in WestConnex within the meaning of the Act):



**R A Finlay**  
*Chair, WestConnex*



**Andrew Head**  
*Chief Executive Officer, WestConnex*  
As representatives of the WestConnex Boards

# 25 Appendices



# Appendix A

## Reporting entities

This Modern Slavery Statement has been prepared as a joint statement on behalf of the following reporting entities:

- WCX AHT Pty Ltd ACN 625 890 708
- WCX AT Pty Ltd ACN 625 890 753
- WCX PHT Pty Ltd ACN 625 890 744
- WCX PT Pty Ltd ACN 625 890 799 (collectively the “WestConnex Group”)
- WCX M4 PHT Pty Ltd ACN 614 741 374
- WCX M4 PMT Pty Ltd ACN 626 329 342
- WCX M4 PT Pty Ltd ACN 614 741 436
- WCX M4-M5 Link AHT Pty Limited ACN 624 153 751
- WCX M4-M5 Link AMT Pty Ltd ACN 626 329 333
- WCX M4-M5 Link AT Pty Ltd ACN 624 153 742
- WCX M4-M5 Link PHT Pty Limited ACN 624 153 779
- WCX M4-M5 Link PMT Pty Ltd ACN 626 329 566
- WCX M4-M5 Link PT Pty Limited ACN 624 153 788
- WCX M5 AHT Pty Ltd ACN 608 763 524
- WCX M5 AMT Pty Ltd ACN 626 329 253
- WCX M5 AT Pty Ltd ACN 608 798 081
- WCX M5 PHT Pty Ltd ACN 608 763 088
- WCX M5 PMT Pty Ltd ACN 626 329 477
- WCX M5 PT Pty Ltd ACN 608 798 465 (together, referred to as ‘WestConnex’)

### Sydney Transport Partners and the Transurban Group

In September 2018, Sydney Transport Partners, an Australian-led consortium made up of Transurban, Canada Pension Plan Investment Board, Tawreed and Australian Super, reached financial close in a 51% stake of the WestConnex Group. During the reporting period, the remaining 49% was held by the NSW State Government through Roads Retained Interest Pty Ltd. On 20 September 2021, the NSW Government announced that Sydney Transport Partners was the successful bidder for the remaining 49% stake in WestConnex.

References to ‘Transurban’ in this statement collectively refers to the Transurban Group.

Further details on WestConnex roads and projects managed by the reporting entities outlined above, together with all Transurban Group roads and projects, are covered in the Transurban FY21 Corporate Report.

# Appendix B

Mandatory reporting criterion	Reference in this statement
Identify the reporting entity	<ul style="list-style-type: none"> <li>• WestConnex Reporting Entities under the Act - <a href="#">see page 3</a></li> <li>• Appendix A - <a href="#">see page 26</a></li> </ul>
Describe the reporting entity’s structure, operations and supply chains	<ul style="list-style-type: none"> <li>• About WestConnex - <a href="#">see page 6</a></li> <li>• Our Structure and Operations - <a href="#">see page 8</a></li> <li>• Our supply chain - <a href="#">see page 12</a></li> </ul>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	<ul style="list-style-type: none"> <li>• Modern slavery risks - <a href="#">see page 14</a></li> </ul>
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	<ul style="list-style-type: none"> <li>• Our approach - <a href="#">see page 16</a></li> <li>• Multi-stakeholder engagement - <a href="#">see page 23</a></li> <li>• Assessment and effectiveness - <a href="#">see page 21</a></li> </ul>
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	<ul style="list-style-type: none"> <li>• Assessment and effectiveness - <a href="#">see page 21</a></li> </ul>
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	<ul style="list-style-type: none"> <li>• Consultation - <a href="#">see page 24</a></li> <li>• Approval - <a href="#">see page 24</a></li> </ul>
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"> <li>• Our broader sustainability efforts - <a href="#">see page 3</a></li> <li>• Multi-stakeholder engagement - <a href="#">see page 23</a></li> </ul>

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