



Transdev Australasia Modern Slavery Statement 2021



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What is Modern Slavery? The Australian Commonwealth Modern Slavery Act 2018 defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour include situations where children are subjected to slavery or similar practices, or engaged in hazardous work.





CEO introduction and purpose of this statement

I am pleased to present Transdev Australasia’s modern slavery statement for the reporting year ending 31 December 2021 (this “Statement”), prepared for the purpose of section 16 of the Australian Modern Slavery Act 2018 (Cth) (the “Act”).

This is a statement pursuant to section 14 of the Act made by reporting entity Transdev Australasia Pty Ltd (Transdev Australasia), a proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth). Transdev Australasia is the parent company and principal governing body of Transdev Australasia’s group of entities and has prepared this Statement on behalf of those entities constituting reporting entities as defined under the Act. A description of entities covered by this Statement, their structure and operations is included in Section 2 and are together referred to as “us”, “our”, “we” or “Transdev”.

This Statement describes the steps taken by Transdev to assess and address modern slavery risks in accordance with the mandatory reporting criteria under the Act. The mandatory reporting criteria and how we are addressing them in this Statement are set out below:

Mandatory criteria for modern slavery statements	Page
Identify the reporting entity (About Transdev Australasia)	6-8
Describe the reporting entity’s structure, operations and supply chains	9-11
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	12-14
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	15-17
Describe how the reporting entity assesses the effectiveness of these actions	18-19
Any other relevant information (Future outlook)	20
Describe the process of consultation with any entities the reporting entity owns or controls	21

Our purpose at Transdev is to give people the freedom to move every day, thanks to safe, reliable and innovative solutions that serve the common good. **We connect people and communities – where they live, work and play** – operating public transport services on buses, ferries, light rail, trains and new mobility solutions across six cities in Australia and New Zealand. Showing genuine care for our employees, stakeholders, communities and our customers is at the very heart of our purpose, and therefore so too is the fight to combat modern slavery.

We recognise the potential existence of modern slavery in our operations and supply chains.

Our approach is to manage modern slavery risks as a subset of broader sustainability related concerns important to our business and stakeholders. We are committed to the objectives and principles underpinning the Act and to working with our stakeholders, contractors and suppliers in preventing and mitigating any modern slavery impacts associated with our day to day work.

In the reporting year 2021, we continued our continuous improvement journey to mitigate modern slavery risks across our business and supply chains – our actions are aligned with our purpose, our broader sustainability commitments and the mandatory requirements under the Act.

We continued to implement our Sustainable Procurement Action Plan (SPAP). The three year SPAP was developed with the support of external experts and informed by completing a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable procurement and mapping

risks and opportunities inherent in our supply chains; it includes a core focus on protecting human rights and combatting modern slavery. Actions achieved in 2021, in accordance with our SPAP, included introducing a new Procurement Policy and associated processes to specifically address sustainable procurement and how we will mitigate modern slavery risks, engaging internal stakeholders, and engaging suppliers in high risk categories.

The SPAP complements Transdev Australasia's existing governance and risk management practices, in Australia and New Zealand and globally as part of the European headquartered Transdev Group. Our approach shows our commitment to meeting our communities' expectations, to improve trust and respect among all employees and with our stakeholders.

Sincerely,



Luke Agati, CEO Transdev Australasia

ABOUT

Transdev Australasia

Transdev Australasia is one of the region's leading multi-modal mobility operators employing over **5,650 people at the end of 2021** in Melbourne, Sydney, Brisbane, Perth, Wellington and Auckland.

In 2021 we delivered more than **90 million passenger journeys** connecting people and communities.

Transdev Australasia specialises in the operation and maintenance of several public transport modes including buses, ferries, light rail, trains and new mobility solutions such as on-demand transport and autonomous shuttles.

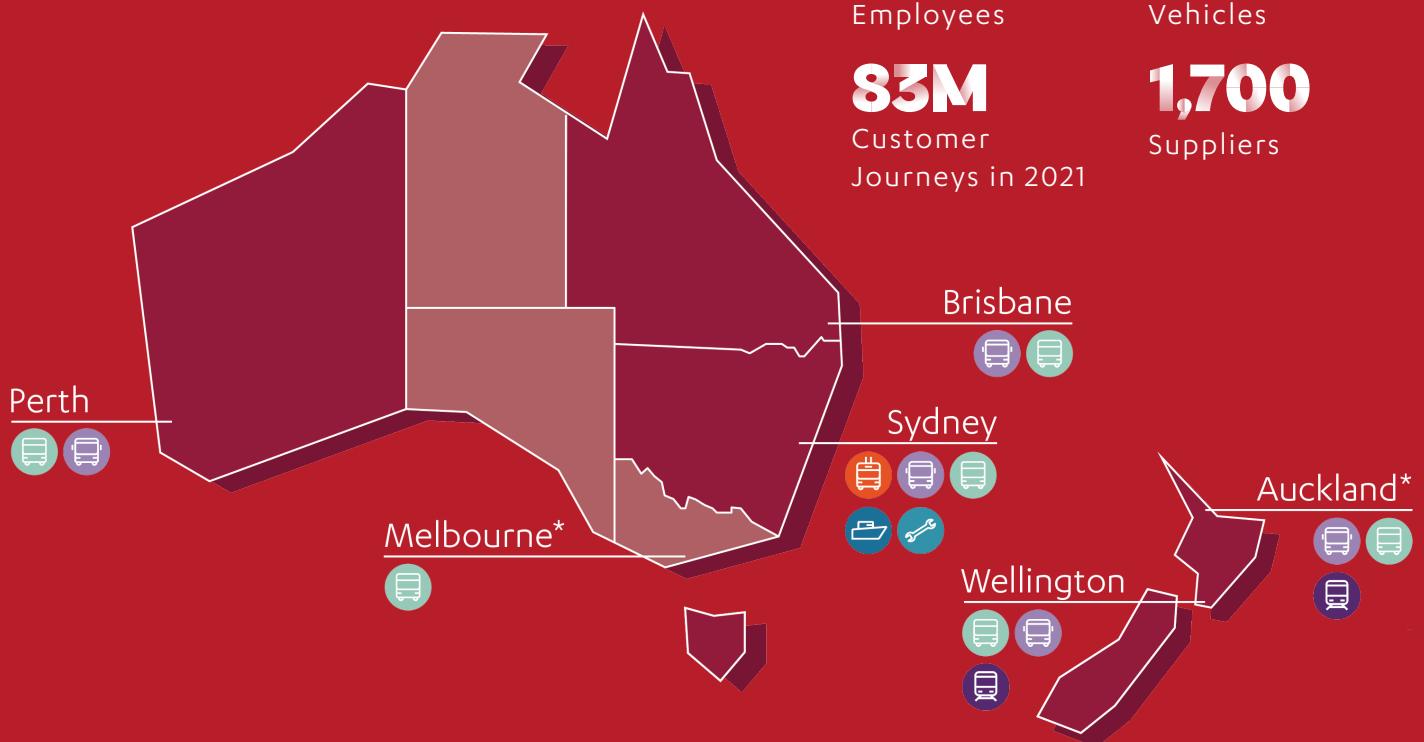
We are part of Transdev Group S.A. – an international group of over 83,000 people who deliver 11 million passenger trips every day across 17 countries, thanks to efficient, easy to use and environmentally friendly mobility services.

5,650
Employees

1,960
Vehicles

83M
Customer
Journeys in 2021

1,700
Suppliers



* Transdev Australasia stopped operating bus services in Melbourne and rail services in Auckland in early 2022

We empower freedom to move every day thanks to safe, reliable, and innovative solutions that serve the common good.

- Our purpose statement

Our purpose and approach

Our approach is rooted in long-term partnerships with communities, businesses and public transport authorities, and in the relentless pursuit of the safest and most innovative mobility solutions.

We strive to be at the forefront of providing safe, reliable, and innovative transport solutions to meet the needs of today and tomorrow, empowering communities and contributing to more liveable cities.

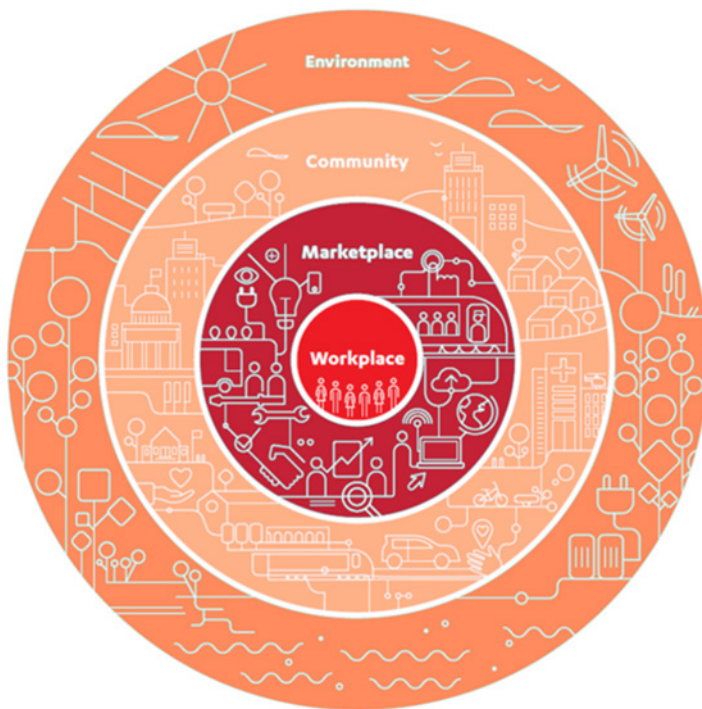
Transdev Australasia is committed to providing services, and acting in a way, that consistently meets community, customer and client expectations.

Our Corporate Social Responsibility framework

Transdev Australasia has developed a framework to capture all aspects of Corporate Social Responsibility (CSR) in our business and guide our approach to sustainability – the Growing Responsibly Framework.

The Growing Responsibly Framework is inspired by ISO 26000:2010 Social responsibility, the Infrastructure Sustainability Council of Australia (ISCA) rating scheme, the United Nation's (UN's) Sustainable Development Goals, as well as Transdev Group's non-financial performance risk register. It comprises the following four pillars:

Growing Responsibly Framework



Workplace – How we support, engage and motivate our people. This pillar covers 13 topics such as diversity and inclusion (gender equality, employees with special needs, ethnics/cultural background and LGBTQIA+ employees), safety and wellbeing of our employees, governance and work-life balance

Marketplace – How we do business, how we interact and engage with our external stakeholders. This pillar captures 11 topics such as customer satisfaction, business ethics, fair operating practices and sustainable procurement

Community – How we manage the impact (reducing negative and creating positive impact) of our activities on the communities, locally – where we operate – and regionally. This is often achieved through partnerships with local stakeholders. This pillar encapsulates seven different topics

Environment – The environment where we operate, as well as our global impact. This pillar covers a range of 16 issues from air pollution to biodiversity, light and visual pollution management and water consumption.

STRUCTURE,

operations and supply chain of Transdev Australasia

Transdev Australasia is the parent company of several entities operating public transport and related services in Australia and New Zealand, and the controlling joint venture partner in Great River City Light Rail Pty Ltd and Transdev John Holland Buses (NSW) Pty Ltd. The table below sets out these entity's structure and operations with further detail on operations provided overpage.

Parent company	Controlled Entities	Operating model	Legal Structure
Transdev Australasia 100%	Transdev NSW South Pty Ltd	Bus public transport and charter services in Sydney, Perth, Brisbane and Melbourne	Proprietary companies limited by shares incorporated under the Corporations Act 2001 (Cth)
	Transdev NSW Pty Ltd		
	Transdev WA Pty Ltd		
	Transdev Queensland Pty Ltd		
	Transdev Melbourne Pty Ltd		
	Transdev Sydney Pty Ltd	Light rail public public transport services in Sydney	
	Transdev Sydney Ferries Pty Ltd	Ferry public public transport services in Sydney	
	Transdev Maintenance Services Pty Ltd	Professional asset maintenance and project management services	
	Howick & Eastern Buses Ltd	Bus public transport and charter services in Auckland and Wellington	
	Mana Coach Services Ltd		
Transdev Auckland Limited			
Transdev Wellington Ltd	Rail public transport services in Auckland and Wellington	Companies limited by shares registered under the Companies Act 1993 (NZ)	
Transdev New Zealand Ltd			
Transdev Australasia 70%, CAF Australia 30%	Great River City Light Rail Pty Ltd	Supply, operate and maintain Paramatta light rail network in Sydney	A proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth)
Transdev 70%, John Holland 30%	Transdev John Holland Buses (NSW) Pty Ltd	The company will begin bus public transport and charter services in Sydney in April 2022	A proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth)

Transdev Australasia's controlled entities, covered by this Statement

Our operating model

Transdev Australasia's public transport operations are split up into three primary teams and one secondary team. Our Operational team focuses on delivering an ever-improving service to all of our customers and consists of drivers, operational managers and other vital frontline employees. Our Fleet team maintains the condition of our vehicles supports a safe and secure experience for our customers. Our Facilities/Assets team focuses on maintaining non-operating fleet assets. Our Corporate team – including IT, Legal, People & Culture, Communications, Finance, Network Planning and Safety & Assurance among other functions – provides support to all primary teams.

Transdev Maintenance Services Pty Ltd provides professional asset maintenance services and project management advisory services to various internal and external clients.

Great River City Light Rail Pty Ltd is contracted to supply fleet and designated operational infrastructure for the Paramatta light rail network in Sydney, and to operate and maintain services once construction is complete. The team is currently involved in project management and delivery of activities in the construction of depots, stops and supply of light rail fleet.

We have identified 30 supplier categories specific to our operating model, outlined on the following page.

Our supply chain structure

Transdev Australasia actively coordinates with over 1,700 suppliers, ranging from fleet procurement, spares and maintenance to cleaning and security. Our emphasis on long-term strategic partnerships enables us to foster close relationships with our suppliers, and results in the ability to implement a joint approach to tackle sustainability related issues.

Around 231 of our supplier relationships exceed a spend of 100,000 AUD per year. The strength and magnitude of these supplier relationships create increased need and opportunity to collaborate and mitigate risks in the supply chain and strive for continuous improvement and improving sustainability outcomes.

In the reporting period, we improved upon and communicated a supplier charter as a commitment to ethical, sustainable and socially responsible procurement (Supplier Charter). This Supplier Charter applies to all suppliers engaged by Transdev and sets out the minimum requirements for suppliers and their supply chain in the areas of integrity, ethical business conduct, conflict of interest, gifts, benefits and hospitality, corporate governance, labour and human rights, health and safety and environmental management.

Suppliers to Transdev are required to comply with this Supplier Charter in accordance with Transdev's purchase order terms and conditions or the relevant contract for the supply of goods and services; including committing themselves to eliminating human rights related risks and complying with possible audits.

Team/operational area	Procurement Categories	
Corporate	IT & telecommunications services	Marketing, communication & publishing
	IT equipment & software	Insurance, legal & financial services
	Collective living and catering area	Labour hire & recruitment
	Office supplies & furniture	Travel & company cars
	Consultancy	
Facilities / Assets	Infrastructure subcontracting or facility management	Waste management
	Utilities (including Electricity Supply)	Construction
	Security & CCTV	
Fleet	Spare parts	Batteries
	Repairs & maintenance subcontracting	Tyres
	Tools, hand tools, small equipment supplies	Diesel fuel & additives
	Bus, coach & vessel – purchases	Lubricants
Operations	Cleaning	Uniforms
	Cash transportation subcontracting	Safety equipment

Key supplier categories relevant to our teams and operating model

231

Suppliers with spend over 100,000 per year

30

Key categories

140

Suppliers with spend over 200,000 per year

Modern slavery

RISKS

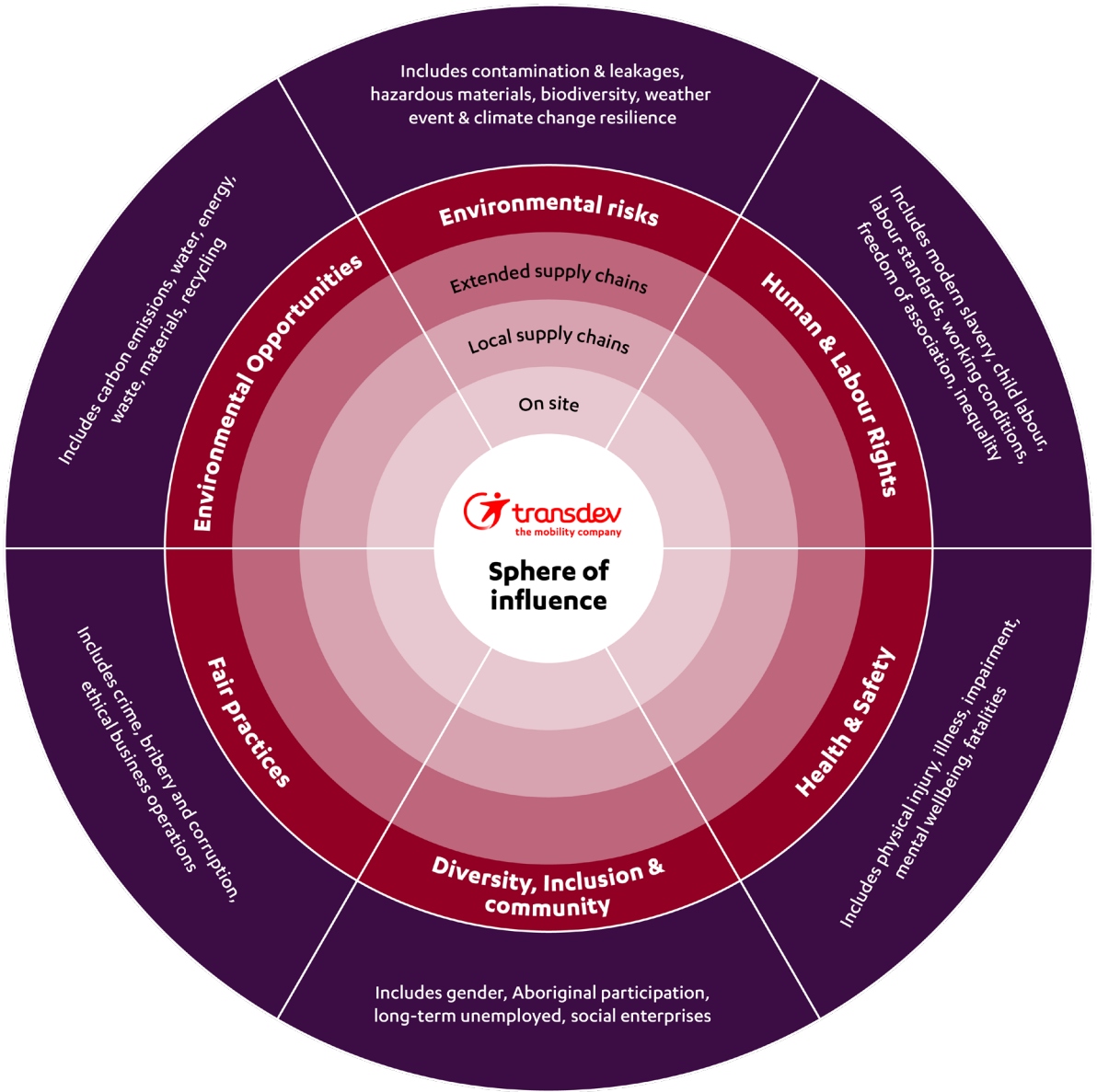
Risks associated with our operational structure

Transdev Australasia's operational structure is characterised by a high degree of unionisation and a largely local supply chain. Frontline employees working within or for Transdev are subject to enterprise agreements under which they are remunerated accordingly. All of our other employees, including the majority in corporate teams, are subject to employment contracts. Due to the nature of these employment arrangements, the risk of modern slavery directly within Transdev Australasia's workforce is low.

Risk assessment

In 2020 we established a Sustainable Procurement Project Team, including members of our Procurement, CSR, People and Culture and Safety and Assurance functions. This collaborative team worked with reputable external experts to complete a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable Procurement, and a risk and opportunity analysis of our supply chain. Through a series of internal stakeholder interviews and risk workshops we reviewed our 30 supplier categories (outlined in Section 2) and mapped risks and opportunities covering our six key focus areas of sustainable procurement highlighted below.

Our assessment of modern slavery risks in our operations and supply chains was based on their potential to cause, contribute or be directly linked to, modern slavery practices.



The six key focus areas of Transdev Australasia's approach to sustainable procurement

Risk assessment results

Transdev Australasia has not yet identified any specific instances of modern slavery and so far, has found with high confidence, that we do not actively cause or contribute to modern slavery. However, we recognise the risk of modern slavery in our operations and supply chains remains. As a result, we have committed ourselves to facilitating additional transparency throughout our extended supply chain.

Through our risk and opportunity assessment, we identified three potential hot spots for modern slavery in procurement categories that are known to have a higher prevalence of human rights and modern slavery risks in their industries: Cleaning, security and uniforms.



Cleaning: Our organisation has implemented stricter hygiene and cleaning protocols to contribute to safe and secure transport solutions during the pandemic. The heightened demand in this industry, and changed economic environment during the pandemic, may have heightened modern slavery risks in this category.



Security: Transdev Australasia subcontracts most of its security needs. Modern slavery risks exist similar to those in the cleaning industry, associated with labour hire. Furthermore, modern slavery risks also exist in the manufacturing of CCTV and security equipment due to complex overseas supply chains.



Uniforms: In the reporting year, Transdev Australasia procured uniforms through suppliers who have complex overseas supply chains. We therefore acknowledge a risk associated with the nature of the product and have developed a strategy with our uniform supplier to indicate the sourcing country and the region for each and every garment we purchase. Suppliers will also provide certificates of ethical practices from the factories where the uniforms are manufactured.



Bus Manufacturing: In the reporting year, Transdev Australasia procured buses with overseas supply chains. We acknowledge a risk associated with the nature of these products and in particular risks in countries where raw materials are sourced for electric batteries.

APPROACH

to combating modern slavery
2021 overview

In 2021 we continued the progressive implementation of our Sustainable Procurement Action Plan (SPAP).

The three year SPAP was developed by our Sustainable Procurement team with the support of external experts in 2020. It was informed by completing a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable procurement and mapping risks and opportunities inherent in our supply chains.

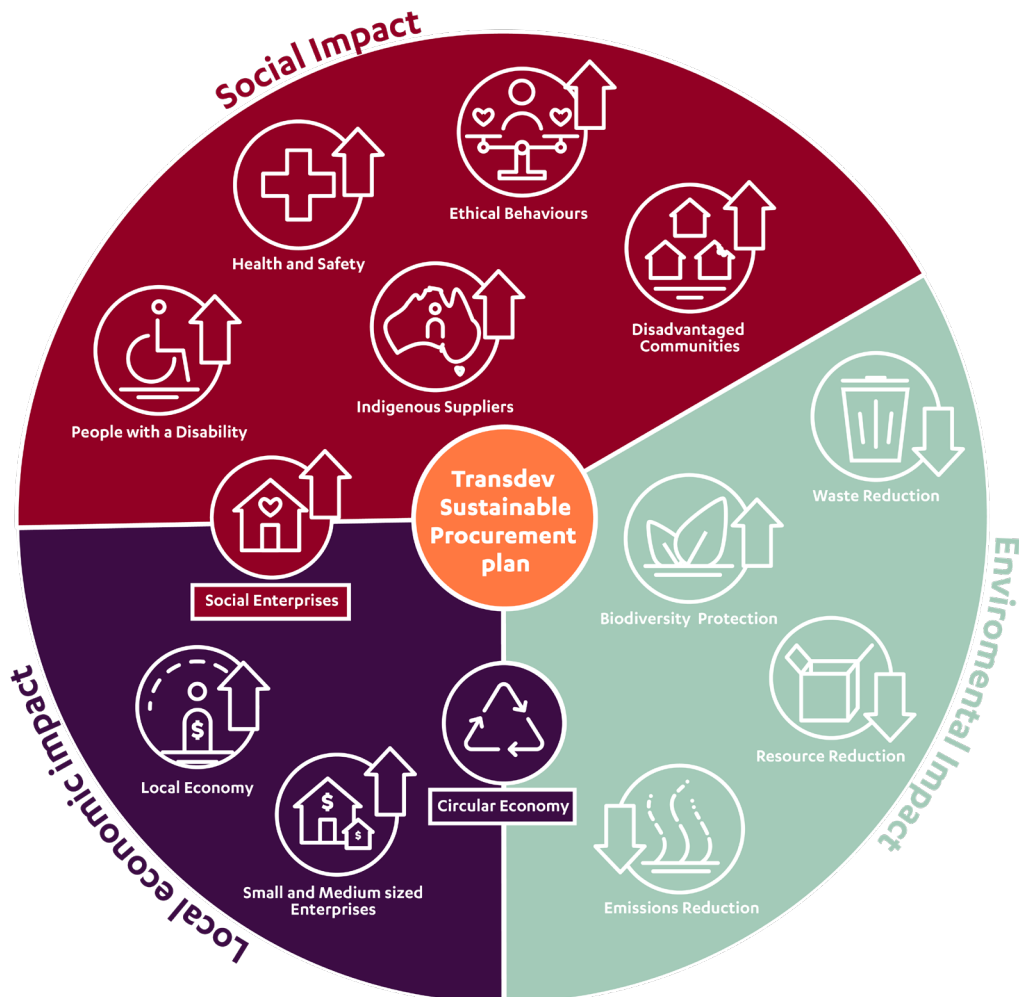
The SPAP it includes a core focus on protecting human rights and combating modern slavery.

Sustainable Procurement Action Plan - Progress made in 2021

The SPAP outlines a three-year path to uplift Transdev Australasia's internal capabilities and processes in line with ISO 20400:2017 Sustainable Procurement, and ensure our procurement processes, policies and fundamentals evolve in line with stakeholder expectations now.

Our SPAP includes engaging key internal and external stakeholders on issues relating to sustainable procurement, and working proactively with key suppliers to achieve continuous improvements in outcomes related to Human Rights (including mitigating the risk of modern slavery) and our five additional focus areas for sustainable procurement: Fair operating practices; Environmental risks; Environmental opportunities; Health and Safety; Diversity, inclusion and community.

More information about the deliverables aligned to the SPAP is included in Section 6 of this statement.



Key objectives of Transdev Australasia's Sustainable Procurement Action Plan

New Procurement Policy and enhanced processes introduced in 2021

In 2021 Transdev Australasia introduced a new Procurement Policy in accordance with our SPAP. The new Policy specifically addresses modern slavery risks and broader sustainable procurement objectives.

Associated process improvements were made to support the Policy, including expanded requirements for sustainability related risks and opportunities to be considered in purchasing decisions and in contractor management. Expanded requirements to conduct Know Your Counterpart analysis and complete external screening, using the Dow Jones Risk Index, for a greater number of potential and existing suppliers were also introduced.

Engaging our people involved in procurement decisions and managing contractors

In 2021 we continued the process of broad engagement and training to build competence to understand and act on modern slavery and sustainable procurement risks and opportunities. An example activity to build internal competence was the Need2Know November engagement series undertaken.

CASE STUDY

There is a risk of apathy towards modern slavery and other ethics and compliance related risks in Australia and New Zealand, and many business decisions are decentralised.

Transdev Australasia launched an awareness campaign in 2021 called Need 2 Know November recognising these two challenges.

The campaign engaged a broad cohort of business leaders on issues such as corruption and modern slavery through a series of webinars held throughout the month and fact sheets. Over 300 combined participants were registered, and the campaign successfully raised awareness of risks and opportunities, laws and policies and the requirement to report real or perceived ethics breaches.

Established governance and risk management practices

The SPAP compliments our Growing Responsibly Framework and Transdev Australasia's well-established governance, policy and risk management practices. The established elements below will contribute to how we manage our response to human rights and modern slavery risks:



Supplier Charter: Our Supplier Charter sets out the responsibilities and reporting standards we expect of our suppliers and ensures suppliers comply with local and wider regulation. We expect all existing and new suppliers to commit to the charter including all clauses within it. Our dedication to eliminate modern slavery is communicated through our human rights section which includes (but is not limited to) provisions on coercion-free as well as the absence of forced, bonded or indentured labour.



Model Contract Clauses: Transdev has developed Model Clauses for agreements with counterparties, prepared in line with generally accepted market standards and main regulatory contracts relating to ethics and compliance matters (e.g. UKBA, FCPA, Sapin II). They are designed to remind our counterparty of the values and principles to which we adhere, obtain various representations including that the counterparty has not and will not commit a violation of the ethics & compliance rules in connection with the purpose at stake, ensure Transdev has audit rights, and that we may suspend or even terminate the underlying contract in the event of a reasonable suspicion of breach.



Ethics and Compliance Management System: Transdev Australasia complies with Transdev Group's global Ethics and Compliance Management System (ECMS). The ECMS sets out stringent requirements in respect to the protection of human rights, transparency, action against corruption, and the application of local laws and regulations. Its requirements are embedded into our teams' management systems and plans, and form part of our internal performance monitoring.



Know Your Counterpart process: In line with our ECMS we are implementing 'Know your counterpart' (KYC) process for key suppliers. KYC constructs risk profiles and captures valuable information about each of our suppliers and their actions and commitments. This helps us to assess whether a potential supplier is aligned with our policies and ambitions.



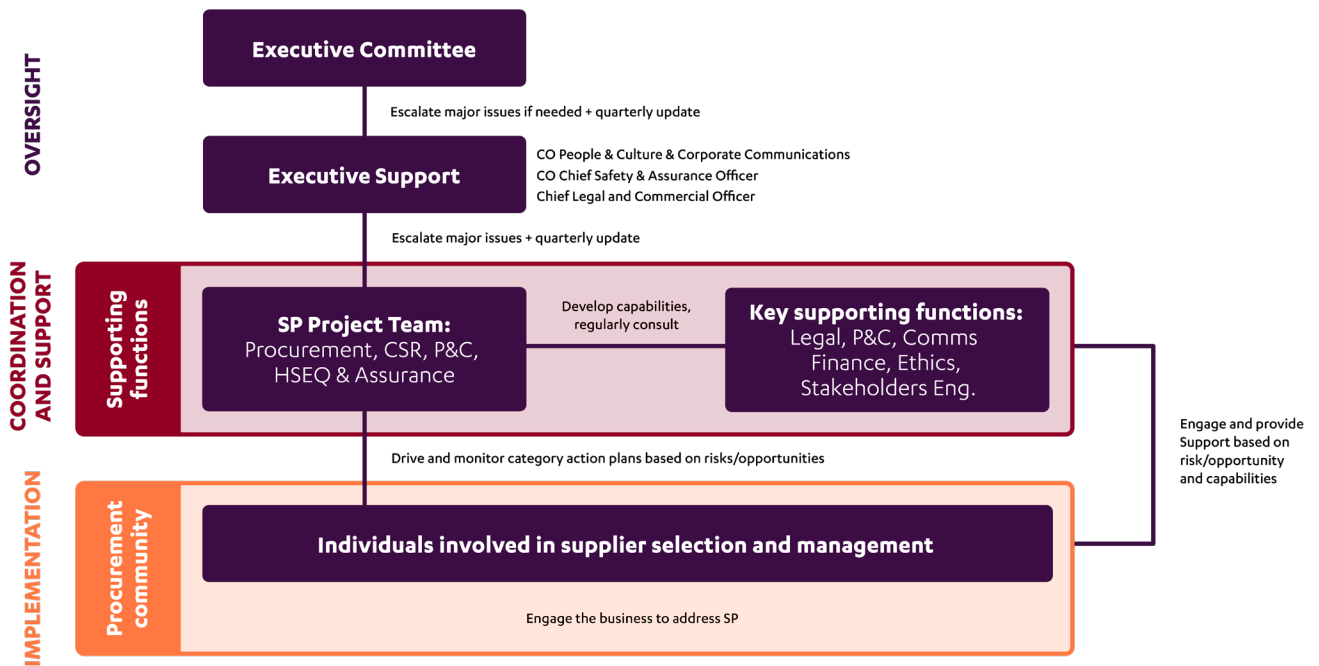
Further relevant Transdev Group policies - Code of Ethics, Human Rights Policy, and Anti-Corruption, Money Laundering and Financing of Terrorism (ACMF) Code of Conduct: Our decisions and actions are governed by Transdev Group's code of ethics, which applies to all companies (entities) operating as part of Transdev Group globally. Transdev Group continuously updates the Code of Ethics to match and surpass an ever-changing external environment and regulation. Transdev's Global Code of Ethics are supplemented by Transdev Australasia's Business Ethical Guidelines Policy. Furthermore, Transdev group's Human Rights Policy and Anti-Corruption, Money Laundering and Financing of Terrorism (ACMF) Policy provide clear behavioural and procedural expectations of Transdev Australasia employees and partners, and a strong ethical framework.



MEASURING

performance and effectiveness

To measure effectiveness and implementation of our SPAP, including the mitigation of modern slavery risks, we have implemented a governance structure specific to sustainable procurement consisting of three main levels: Oversight, Coordination & support and Implementation.



Governance structure of sustainable procurement at Transdev Australasia

Remediation

At Transdev Australasia, we value input and feedback on issues such as modern slavery from all stakeholders. Our culture of minimising risks and taking responsibility allows us to take a proactive stance on remediation.

Our whistleblower policy gives employees and stakeholders a voice, allowing them to report misconduct and raise any ethics related issues such as modern slavery without fear of reprisal. During the reporting period, we consolidated our anonymous Whistle-blower hotline and a corresponding policy. This includes an action plan for when an issue materialises.

Transdev will focus on raising awareness of the forms of modern slavery among our employees and supply chain, continue to evolve our due diligence processes to aid in identifying relevant risks, reviewing existing processes and improve modern slavery risk mitigation throughout our supply chain.

We commit ourselves to developing further capabilities for modern slavery remediation and other sustainability related issues.

FUTURE OUTLOOK

In 2022 and beyond, we expect to increase our diligence regarding modern slavery reporting and risk management. We anticipate a prolonged impact of the COVID-19 pandemic and will continue to deliver necessary services and support to our affected stakeholders.

We will continue to progressively implement our SPAP over the next two years. In 2022 we will complete Year 2 actions and transition into Year 3 of the plan. A high level summary of our planned activities to realise our SPAP objectives are highlighted below:

High-level sustainable procurement action plan

		Year 1 (2020/2021)	Year 2 (2021/2022)	Year 3 (2022/2023)
ISO 20400 Framework	Procurement process	Executive and leadership engagement	Broad stakeholder engagement and training to build competence	Review of SPAP outcomes
	Enablers	Update SP governance including key policies	Continuous improvement of SP governance	Review procurement and contract management systems
	Policy & Strategy	Enhance procurement processes and plans		
	Fundamentals			
High risk / high opportunity supplier category engagement				

A high level overview of our Sustainable Procurement Action Plan

STAKEHOLDER

coordination and engagement

All of Transdev Australasia’s controlled entities, as outlined in Section 2, were consulted and involved in the preparation of this Statement.

This Statement was prepared by the Sustainable Procurement Project team, in consultation with senior management including the reporting entity’s Executive Leadership team and operational teams involved in the ongoing implementation of the Sustainable Procurement Action Plan.

This Statement has been approved by the Board of Directors of Transdev Australasia.

As an operator and global integrator of mobility, Transdev **gives people the freedom to move** whenever and however they choose.

Transdev Australasia

Melbourne: Level 8, 469 La Trobe Street,
Melbourne VIC 3000

Sydney: Building C, Level 3, 33 Saunders St,
Pyrmont NSW 2009

www.transdev.com.au

