



# TRANSDEV AUSTRALASIA

## MODERN SLAVERY STATEMENT

### 2023

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

# Contents

CEO introduction and purpose of this statement	5
Section 1: About Transdev Australasia	7
Section 2: Structure, operations and supply chain of Transdev Australasia	9
Section 3: Modern slavery risks	13
Section 4: Relevant Policies	16
Section 5: Actions in 2023	19
Section 6: Measuring Performance and Effectiveness	23
Section 7: Future outlook	25
Section 8: Stakeholders coordination and engagement	26



## Acknowledgment of Country

Transdev Australasia acknowledges and pays our respects to Aboriginal and Torres Strait Islander people as the First Peoples of Australia whose ancestral lands and waters we work and live on throughout Australia. We honour the wisdom of, and pay respect to, Elders past, present and future.

With regards to our New Zealand operations, we recognise the Maori people as the Tangata Whenua Aotearoa (people of the land NZ), and the Tiriti o Waitangi (Treaty of Waitangi).

We also acknowledge the historic and lived experience of First Nations People who have endured injustices and various forms of slavery. This has impacted generations of First Nations Peoples and remains an area of unfinished business.



## 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

Transdev Australasia recognises the importance of combating modern slavery, a crime that affects individuals and communities across the globe. As a company committed to sound environmental, social and governance practices, we promote ethical behaviour throughout our businesses, and ensure that our robust standards of business conduct are understood and valued by all who work at Transdev Australasia. We are determined that no person's freedom is denied anywhere in the operations of our businesses or our supply chains.

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:

<b>Mandatory criteria for modern slavery statements</b>	<b>Page</b>
Identify the reporting entity (About Transdev Australasia)	7-8
Describe the reporting entity's structure, operations and supply chains	9-12
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	13-15
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	19-21

Mandatory criteria for modern slavery statements	Page
Describe how the reporting entity assesses the effectiveness of these actions	23-24
Any other relevant information (Future outlook)	25
Describe the process of consultation with any entities the reporting entity owns or controls	26

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.

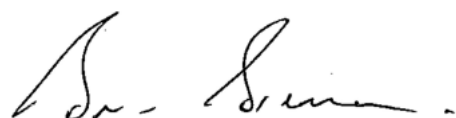
This is our fourth Modern Slavery Statement and we continue to make strong progress. During 2023 we continued to implement our Sustainable Procurement Action Plan (SPAP) launched in 2020. The SPAP was developed with the support of external experts and informed by completing a gap analysis of existing procurement and contract management practices against ISO 20400:2017 Sustainable procurement and mapping risks and opportunities inherent in our supply chains.

Key objectives of the SPAP include:

- Ensure all businesses operate in accordance with the Modern Slavery Act 2018 (Cth), including all future amendments to this legislation
- Ensuring our employees understand modern slavery
- Providing people with appropriate avenues for reporting potential instances of modern slavery within our operations and within the operations of our suppliers
- Mitigating modern slavery risk within our operations
- Eliminating potential and/or actual modern slavery practices from our operations and supply chains

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,



**Brian Brennan, CEO Transdev Australasia**





# Section 1 | About us

Transdev Australasia is one of the region's leading multi-modal mobility operators employing over 5,100 people at the end of 2023 across Melbourne, Sydney, Brisbane, Perth, Wellington and Auckland.

In 2023 we delivered more than 124 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 and trains.

We are part of Transdev Group S.A. – an international group of over 102,000 people who deliver 11 million passenger trips every day across 19 countries, thanks to efficient, easy to use and environmentally friendly mobility services.

## 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 and exceeds community, customer and client expectations.

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



**124M+**

Customer Journeys

**6**

Locations

**4400+**

Locations







## Section 2 | 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 on page 9 sets out these entity's structure and operations with further detail on operations provided overpage.

# Our operating model

Transdev Australasia’s public transport operations are split up into four teams. 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/Assets team maintains our assets, including the condition of our vehicles/vessels to support a safe and secure experience for our customers. Our Facilities team focuses on maintaining our building 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.

We have identified 46 supplier categories specific to our operating model, outlined on the following page.

# Our supply chain structure

Transdev Australasia actively coordinates with over 1,800 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 219 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.

We communicate our 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.

**219**

Suppliers with spend over 100,000 per year

**46**

Key categories

**134**

Suppliers with spend over 200,000 per year

Parent company	Controlled Entities	Operating model	Legal Structure
Transdev Australasia 100%	Transdev NSW South Pty Ltd		Proprietary companies limited by shares incorporated under the Corporations Act 2001 (Cth)
	Transdev NSW Pty Ltd	Bus public transport and charter services in Sydney, Perth and Brisbane	
	Transdev WA Pty Ltd		
	Transdev Queensland 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 Wellington Ltd	Rail public transport services in Auckland and Wellington	Companies limited by shares registered under the Companies Act 1993 (NZ)
Transdev Australasia 70%, CAF Australia 30%	Great River City Light Rail Pty Ltd	Supply, operate and maintain Paramatta light rail network in Sydney	
Transdev 75%, John Holland 25%	Transdev John Holland Buses (NSW) Pty Ltd	Bus public transport and charter services in Sydney	A proprietary company limited by shares incorporated under the Corporations Act 2001 (Cth)

*Transdev Australasia's controlled entities, covered by this Statement*



Team/ operational area	Key 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	Infrastructure subcontracting or facility management	Waste management
	Utilities (including Electricity Supply)	Construction
	Security & CCTV	
Fleet/Assets	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



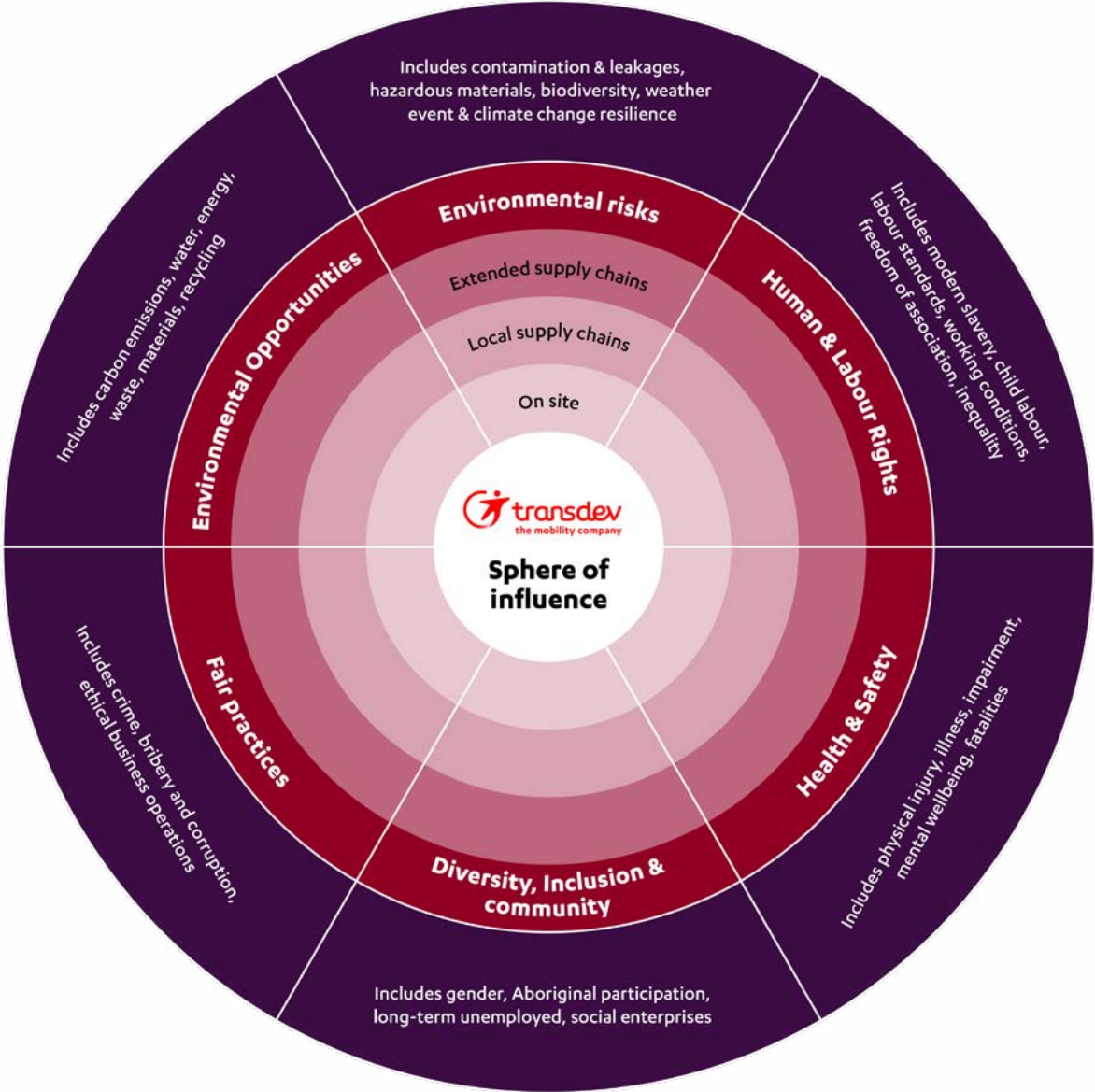
## Section 3 | Modern Slavery Risks

### **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 46 supplier categories (outlined in Section 2) and mapped risks and opportunities covering our six key focus areas of sustainable procurement highlighted below.



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 four 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, uniforms and bus manufacturing.



**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.



## Section 4 | Our relevant policies

We have a zero tolerance approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or that of those who supply us; this stance is made clear in all our policies and behaviours.

Our key policies, outlining the steps that we have taken to mitigate against the risks of modern slavery, are set out below. These are reviewed on a regular basis.

- Our Code of Conduct which sets out the conduct that we expect of our partners, employees, contractors and suppliers.
- Our Group Code of Ethics which covers key topics as: Integrity, Opposition to Fraud and Corruption and Knowledge of Third Parties.
- Our Business Ethical Guidelines Policy which communicates how we should interact with our business partners and environment, with particular focus on Conflict of Interest and Confidentiality.
- Our Group Human Rights policy expands on what we mean by protecting Human Rights and how this should be done in a daily business context. This policy requires all Transdev employees to respect and adhere to the policy principles and report any misconduct.
- The policy protects rights to:
  - Acceptable working conditions
  - Acceptable hours, wages and leaves
  - Fair treatment
  - Freedom of association
  - Free and adult labour
- The Anti-Corruption, Money Laundering and Financing Terrorism (ACMF) Code provides guidelines, rules and principles associated with:
  - Gifts and invitations
  - Sponsorship, Corporate Philanthropic, Non-profit Organisations and Charities
  - Intermediaries
  - Political Contributions
  - Facilitating Payments
  - Influence Peddling
  - Collusion
  - Recruitment and other HR Advantages
  - Business relationships
- The Transdev Australasia Whistleblowing Protection Policy allows staff to raise any concerns that they may have about any individuals or organisations that Transdev Australasia interacts with, whether they be clients, suppliers or others.



## Established governance and risk management practices

The established elements below also 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



**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.





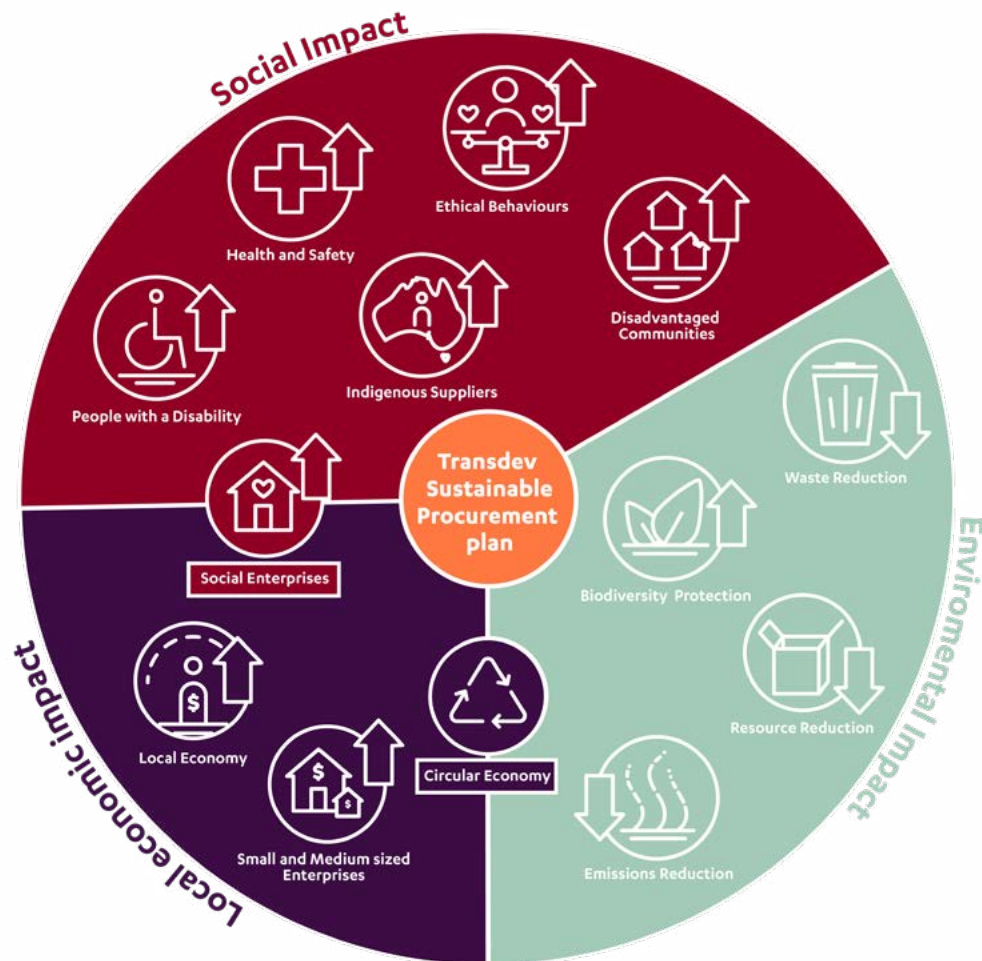


## Section 5 | Key actions in 2023

In 2023 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 core focus of the SPAP is the protection of human rights and combating modern slavery. Specific actions delivered under the SPAP are detailed in this Section.



Key objectives of Transdev Australasia's Sustainable Procurement Action Plan

## Corruption Risk Mapping

Corruption is an underlying cause of, and a facilitating tool for, practices arising from contemporary forms of slavery. It is essential to creating the conditions for a low-cost, low-risk, high-profit illicit trade in vulnerable individuals.

A corruption risk mapping exercise was completed by Transdev in 2022 and updated in 2023, covering its operational business units. The exercise involved workshopping various corruption scenarios with representatives from our business development, procurement, legal and risk teams. A series of measures were developed to mitigate identified corruption risks.

## Finalisation and Implementation Transdev Australasia Know Your Counterparty Procedure

In 2022 Transdev Australasia introduced a Know Your Counterparty (KYC) procedure outlining a screening process as part of the onboarding process for high risk business engagements. The KYC process requires screening of high-risk counterparties to determine if they are compliant with law and regulations, financially viable and ethically aligned with Transdev Australasia prior to entering a contractual agreement. Training on the procedure was completed with key representatives from the Transdev Australasia Business Development and Procurement teams.



## **KYC Training - Business Development Team**

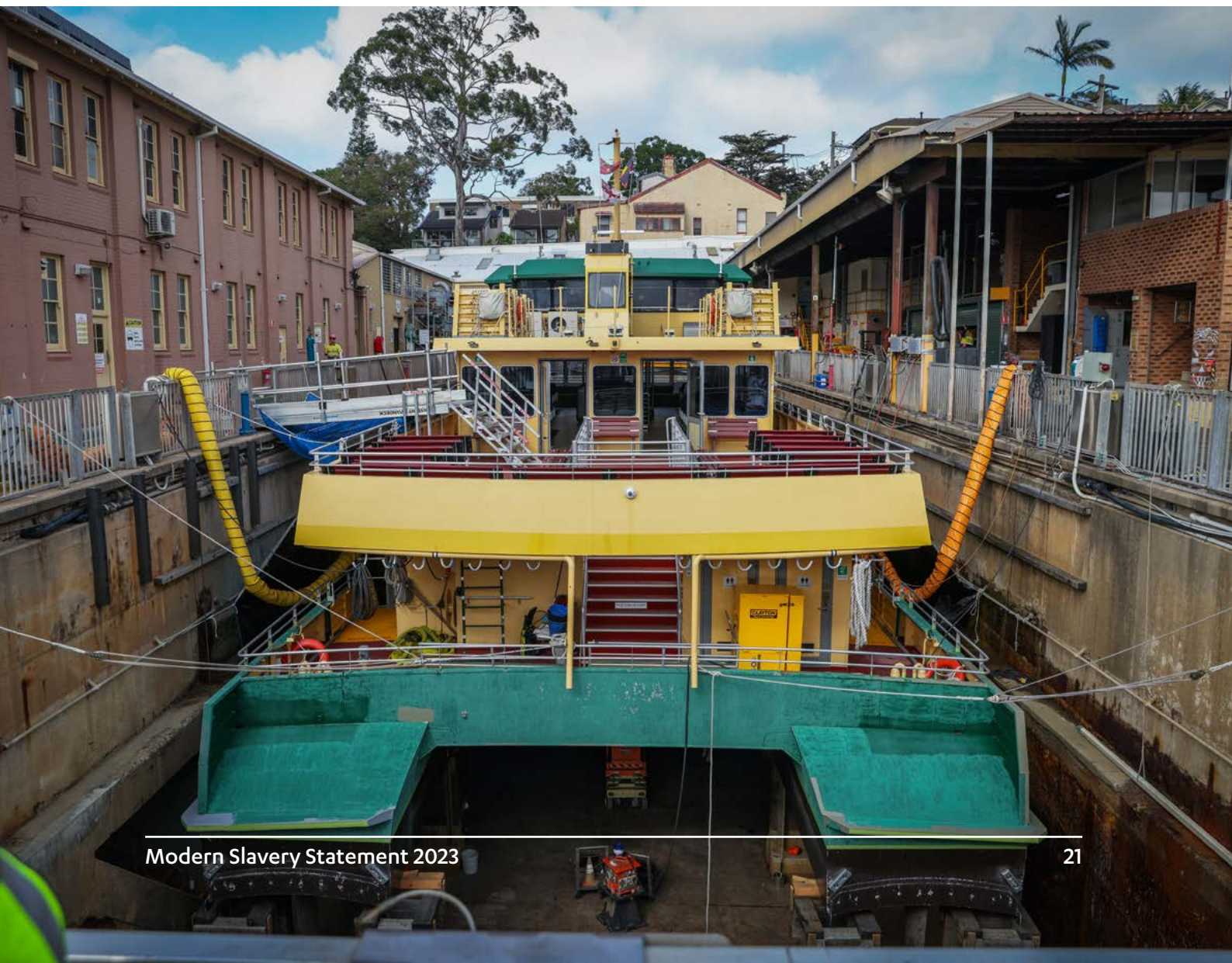
A key part of the Transdev Modern Slavery strategy is ensuring that our business partners are ethically aligned with us. The Transdev Know Your Counterparty procedure requires the carrying out/undertaking of an ethics assessment on high risk suppliers prior to entering into a contractual agreement. Targeted training on this procedure was completed with members of the Transdev Business Development Team during 2023.

## **Whistleblower Awareness Campaign**

The availability of the Transdev Australasia Whistleblower platform was communicated via a poster campaign launched in Depot and office spaces.

## **Human Rights Questionnaire**

For certain business development activities, Transdev completes a human rights questionnaire relating to the project as part of the project governance process. The questionnaire is completed to reasonably ensure compliance with Human Rights obligations which include considering whether necessary measures have been taken to prevent and mitigate modern slavery practices such as child and forced labour.



# Case Study

## Trans'Lead Frontline Managers Program

Developing and supporting Transdev's frontline managers is essential to the success of the Transdev Group. The Transdev Australasia Trans'Lead Frontline Manager Program, developed as part of a Transdev Global Learning and Development initiative, was delivered over the course of 2023. The program provided training across 17 core competencies aligned to the role of a frontline manager and served to build a portfolio of enterprising leaders, increase business outcomes, improve employee engagement, and support a greater global vision with a competitive edge.

Ethics and compliance, a core competency of the program, covered the following areas:

- Concepts of ethics, compliance and human rights as they relate to Transdev
- The practice of ethical behaviours in alignment with Transdev's values
- Fostering a team environment of ethical behaviours
- Demonstrate ethical awareness and the ability to apply ethical principles in decision-making.

Key statistics from the program include:

- 137 employees trained across Australia and New Zealand
- Program delivered to Transdev employees across all modes: Bus, Rail, Ferries and Light Rail
- Face-to-face training delivered across Transdev's Auckland, Wellington, Sydney, Brisbane, Melbourne and Perth businesses

The integrated learning program was designed to create a uniform approach to ethics, compliance and human rights management across our businesses.







# Section 6 | Measuring performance and effectiveness

**ECMS Working Group**

Transdev Australasia’s ECMS (Ethics and Compliance Management System) Working Group is comprised of members of the finance, legal, people and culture and IT departments. This Group meets quarterly to discuss the effectiveness of our ethics and compliance framework. It has oversight to:

- Provide for regular engagement and feedback between key functions on all ethics and compliance topics, including Modern Slavery;
- Tracking the impact of actions taken to improve ethical purchasing;
- Discuss ethics training development and deployment;
- Consider improvements requirements to our ECMS

**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.

The Transdev Australasia Whistleblower Policy applies to all employees and to external stakeholders. Through the policy Transdev Australasia aims to enable team members and others to confidentially voice concerns, without fear of retribution. In 2023 no feedback was received through the Whistleblower platform with allegations of modern slavery.

**Monitoring Performance**

The below KPIs have been used to assess Transdev Australasia effectiveness in the approach to mitigating Modern Slavery:

Action	Performance Indicator
Ethics and Compliance Working Group	Meeting Frequency
	Meetings Held
Training	Percentage (%) of TDA’s key categories employees (contract management, procurement) trained to recognise and safeguard against modern slavery risk
	Percentage of Transdev Managers who have completed Anti-Corruption Training
Modern Slavery Instances	Instances detected
	Instances remedied (and how)





# Section 7 | Future Outlook

In 2024 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.

A high level summary and status of our planned activities to realise our SPAP objectives are highlighted below.

## 2024 objectives

Focus Areas	Objectives
Supplier Management	By the end of quarter 4, our aim is to develop a Supplier Induction Process, which will require new suppliers to read and acknowledge key Transdev Australasia ethics and sustainability policies as part of their engagement
	By quarter 4 we aim to develop a high-risk supplier questionnaire program
Training and Awareness	Annual training of Operational Staff on the Transdev Australasia Ethics and Compliance Management System
	Annual enhanced e-learning training for Modern Slavery Risks delivered to at risk employees
Remediation	By the end of quarter 4 we aim to increase operational engagement with the Transdev Australasia Whistleblower Platform by providing information and access links on the employee App



## Section 8 | Stakeholders 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 Transdev Ethics 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.

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

**Transdev Australasia**

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