

# NorthWestern Roads Group Modern Slavery Statement 2025



## /01 About this Statement

This Modern Slavery Statement (Statement) is made on behalf of NorthWestern Roads Group Pty Ltd (the ultimate holding company of the NorthWestern Roads Group) and the following NorthWestern Roads Group reporting entities (together referred to as we, our, NorthWestern Roads Group or NWRG).

- NorthWestern Roads Group Pty Ltd (ACN 169 328 330);
- NorthConnex Company Pty Ltd (ACN 602 719 513);
- NorthWestern Roads Group Nominees Pty Ltd as trustee for the NorthWestern Roads Group Trust (ACN 169 328 287); and
- Westlink Motorway Group (ACN 102 757 924).

This Statement covers the reporting period 1 July 2024 to 30 June 2025 (Reporting Period or FY25) and has been prepared to meet the mandatory criteria of the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act). This Statement is informed by the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (2023).

### Consultation and Engagement

In preparing this Statement, the Group Manager Safety, Sustainability and Stakeholder for NorthWestern Roads Management Services Company, actively engaged and consulted with the relevant business units and entities within NorthWestern Roads Management Services Company, which provides management services to the broader NorthWestern Roads Group. This was undertaken by (i) collaborating with the relevant business units, shareholder subject matter experts, entities and boards of each reporting entity to provide an overview of the reporting requirements of the Modern Slavery Act, (ii) providing information regarding the actions we intend to take to address these requirements including relevant updates, and (iii) seeking feedback from relevant business units, entities and the boards with respect to modern slavery matters. The boards of the reporting entities have common directors. This Statement is the consolidation of the outputs from those efforts.

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## Approval

In the spirit of reconciliation NWRG acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today. We operate and base our activity on Darug Country.

NWRG upholds high standards of conduct, and we are continuously seeking to improve our due diligence practices. We strongly encourage anyone to alert us of concerns about modern slavery, potential human rights issues or unethical behaviours in our operations or supply chain through our whistleblower hotline. Your input is valued, and we take reports of improper conduct seriously. Lodge your report anonymously with our third-party provider using [this link](#).

# Our FY25 Key Achievements



## Risk Assessment

Reviewed the modern slavery risk register in November 2024 and assessed the risks and controls. No major change was reflected and the risk profile remains the same.



## Capability and Awareness

Delivered role specific modern slavery training to 68% of NWRG employees on modern slavery risks and how we address and manage them, with the remainder of staff not in attendance receiving the training pack.



## Grievance and Remediation

Placed multi-lingual anti-slavery signs (from NSW Anti Slavery Commissioner) in the two NWRG offices. The most common languages based on assessment of surrounding local government areas were selected.

Whistleblower hotline made available for everyone, which can be found on our website. Translation services have also been included to ensure inclusivity.



## Due Diligence

Worked with our suppliers and contractors to ensure there was appropriate modern slavery awareness. Resulted in supplier/contractor presentations to NWRG to demonstrate their approach to Modern Slavery.

## Chair's Foreword

**NorthWestern Roads Group (NWRG) recognises that strong governance and ethical conduct are essential to delivering safe and sustainable infrastructure.**

Addressing modern slavery risk is not just a compliance obligation. It reflects who we are as an organisation and the values we uphold, including to respect the human rights of every person in our value chain.

In FY25, the Board welcomed updates on how the business is strengthening its systems and expectations. We saw clear progress in the way modern slavery considerations are being embedded into procurement, contract development and supplier engagement. Importantly, there was a notable shift from awareness to action. Tools developed in previous years, including the supplier self-assessment questionnaire, are now being used more strategically to support continuous oversight and engagement across the contract lifecycle.

We are also encouraged by the growing sense of ownership across the business. Staff are initiating supplier conversations, applying policies in practical settings and reinforcing our expectations in everyday decisions. These efforts reflect a maturing culture, one where risk identification and ethical conduct are becoming part of how NWRG works.

The Board commends this progress and remains committed to supporting an approach that reflects community expectations and emerging best practice. This statement outlines the actions taken over the past year and reaffirms our intent to foster a culture where human rights risks are identified, discussed and addressed.

**Penny Graham**

Chair of NorthWestern Roads Group

# /02 About NWRG

NorthWestern Roads Group operates and maintains **one of Australia's busiest road systems**, encompassing the Westlink M7 Motorway and NorthConnex Tunnel. Managing almost 50km of road and 40km of shared path that allows for more than 85 million trips a year is **a responsibility we take seriously**.

## 2.1 Our Vision and Values

NWRG strives to operate with a positive social, environmental and economic impact, including addressing and mitigating the risk of modern slavery in our organisation. With dependable yet complex supply chains and business operations, we're aiming to improve how we address potential areas where modern slavery risks exist, including procurement, employment, maintenance and manufacturing.

**As stewards of significant assets that require a range of services and support to operate and maintain, we understand the potential impact that our entire supply chain and business operations have on people.**

Most importantly, we know that every purchasing and partnership decision must consider these impacts, too.

We also recognise that our long-standing and concentrated supply chain means we are well placed to engage in meaningful conversations with our key suppliers to take targeted action on modern slavery risks.

NWR takes a serious approach to addressing these human rights violations, with our broader company values guiding every action. Through ongoing collaboration with our partners and the improvement of internal policies and processes, we're committed to continuously improving how we identify and address modern slavery in our operations and supply chain.

**Our vision is linking Sydney and beyond to thrive, and our values guide everything we do.**

### Collaboration

Together we can go further, faster and safer.

### Integrity

We take our responsibility seriously and do the right thing.

### Authenticity

We are open about our challenges with a focus on solutions. We think, act and talk with transparency.

### Focus

We exist to help Sydney and beyond thrive, so this is the mindset we will bring to everything we do.

## 2.2 About NWRG

NWRG, with its registered office located in Eastern Creek NSW, is responsible for the management and operation of two significant infrastructure assets in New South Wales, Australia: the Westlink M7 motorway in western Sydney and the NorthConnex Tunnel in the northwest of Sydney. For detailed information about each motorway, please visit [www.WestlinkM7.com.au](http://www.WestlinkM7.com.au) and [www.NorthConnex.com.au](http://www.NorthConnex.com.au).

NWRG is owned by QIC Private Capital Pty Limited, acting on behalf of funds and clients managed by QIC Limited, the Canada Pension Plan Investment Board (trading as CPP Investments), and Transurban Limited (ABN 96 098 143 410).



## 2.3 Operations

NWRG operates and maintains key road infrastructure, managing traffic systems and related services to ensure efficient transport and connectivity across major road networks. We rely on many skilled professionals and managerial staff to support these operations, and our direct and subcontracted labour hire is based in Australia. These team members play a crucial role in overseeing various aspects of our operations, including contract administration, financial management, risk management, environmental management, technology and safety.

Although NWRG does not directly employ its workforce, it does operate through a Management Services Agreement with NorthWestern Roads Management Services Company, wholly owned by NWRG (referred to as 'NWR').

A small but dedicated group of 25 permanent employees of NWR is responsible for managing contractors who execute essential operations and maintenance services for the Westlink Motorway and NorthConnex Tunnel under this agreement, including:

- **Operations and Traffic Management;**
- **Maintenance Activities (Mechanical, Electrical, Civil and Building, Intelligent Transportation System (ITS), Landscaping);**
- **Incident Management and Response.**

NWRG hired six professionals on consultancy agreements for various roles within the organisation during FY25.

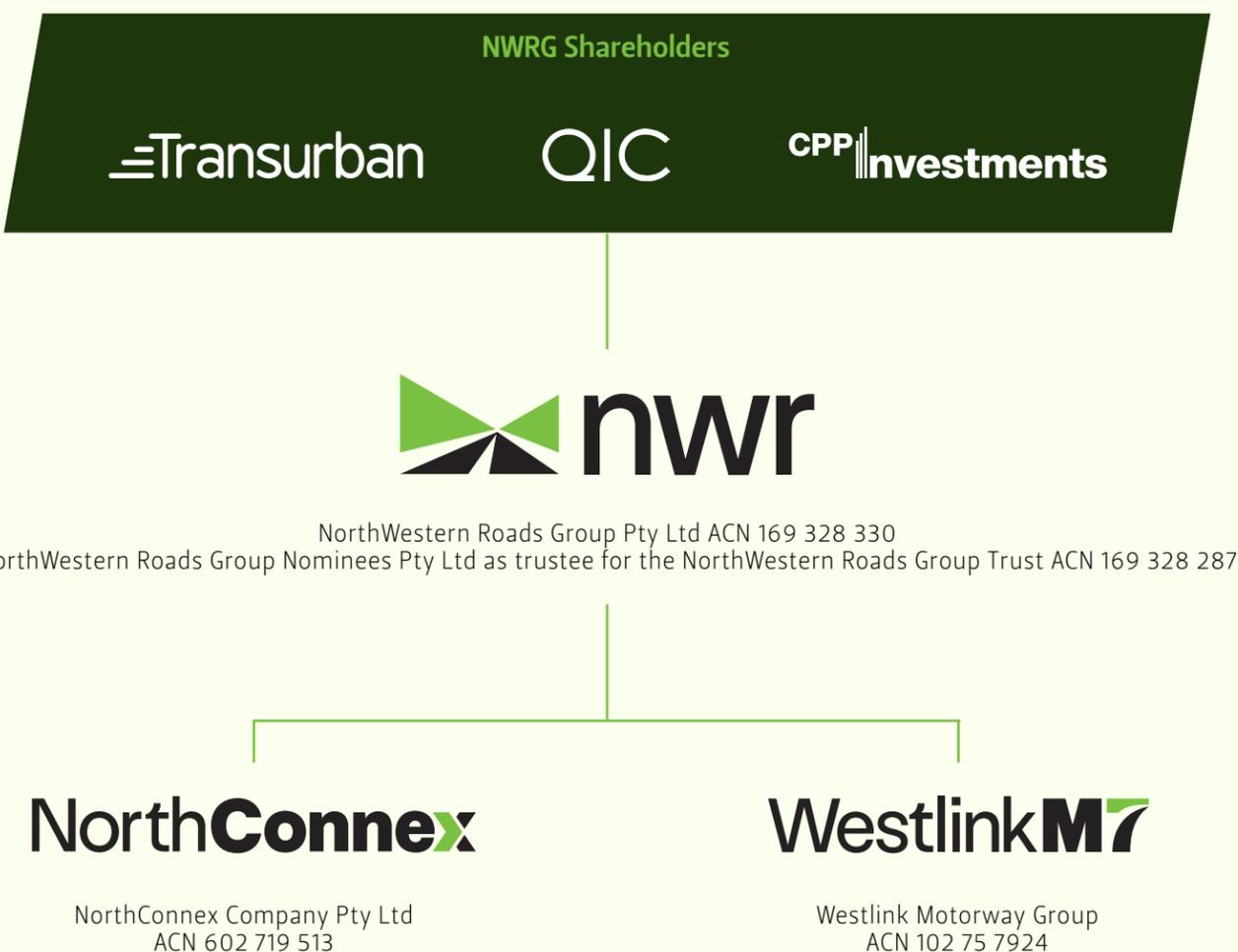
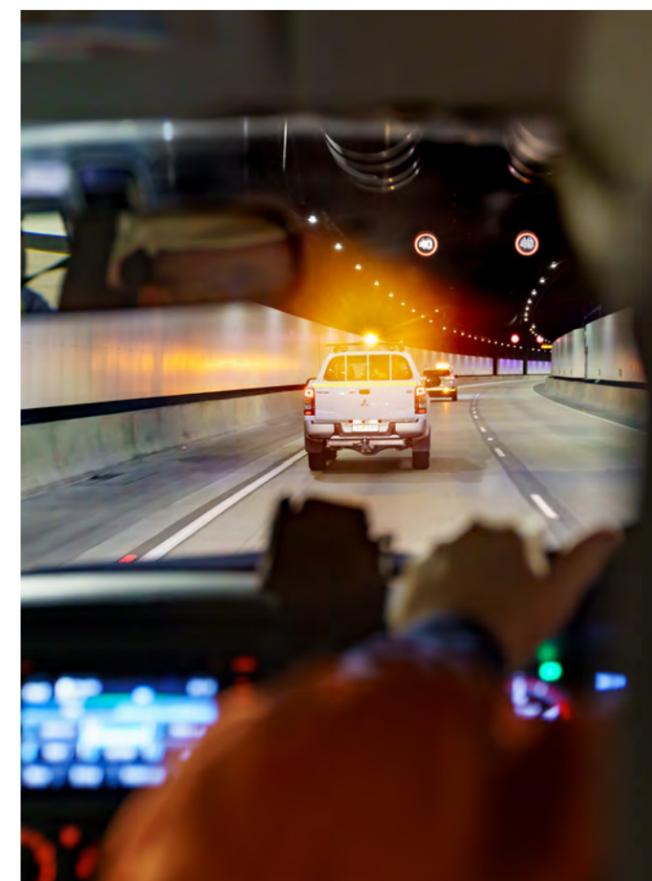


Figure 1. NWRG Group Structure



## 2.4 Supply Chain

NWRG operates with a complex yet dependable supply chain and a commitment to maintaining strong and collaborative relationships with our suppliers.

All of our Tier 1 suppliers are domiciled in Australia. With the exception of some select services (such as contact centre services) with operations in the Philippines, the majority of services we procure are located in Australia. While this local focus reduces exposure to some international risks, modern slavery risks can still exist within Australian supply chains. Notably, 98% of our total spend is concentrated across just 50 Australian suppliers. This presents the opportunity to maintain close, resilient partnerships with each of these suppliers, and deepen our understanding of how they meet their obligations and address modern slavery risks within their operations.

During this Reporting Period, we've maintained the majority of supplier relationships from our three previous Modern Slavery Statements, further strengthening this collaboration and alignment on values. We continue to engage and collaborate to ensure that they understand the importance of maintaining ongoing dialogue regarding identifying and addressing modern slavery risks.



### Case Study #1

#### Turning Awareness into Action through Ethical Sourcing in Uniform Procurement

In January 2025, NWR staff initiated a procurement activity for branded polos and jackets.

While low in value, the purchase provided an opportunity to apply the NWRG modern slavery governance tools in practice. It demonstrated how awareness and training are supporting ethical decision-making across day-to-day operations.

Before engaging the supplier, the NWRG Office Administrator consulted the Group Manager of Safety, Sustainability and Stakeholder to consider potential modern slavery risks. Internal resources, including the NWRG Supplier Code of Conduct and Modern Slavery Supplier Questionnaire, were used to guide early engagement with the vendor.

The selected supplier, provided its Ethical Sourcing Policy, which includes supplier vetting and escalation procedures. The company also shared its Supply Nation certificate, confirming majority Indigenous ownership and alignment with social procurement principles.

While NWRG's procurement systems are still maturing, this case shows how training and tools are being used by staff across the business to support ethical sourcing. It also reinforces that ethical procurement is not limited to large-scale contracts. With the right systems in place, it can be embedded in everyday, lower-value purchases.

## Supply Chain Overview by Spend

Supply Chain Category	Percentage of Overall Expenditure
Westlink M7 and M12 integration project	75.9%
Operations and maintenance services	17.1%
Professional services	2.6%
Technology services	0.8%
Finance and insurance services	0.6%
Legal services	0.4%
Other miscellaneous services and materials	2.6%

Table 1. Supply Chain Overview by Category of Spend

# /03 Our Approach to Risk Management

As a group which owns and operates motorways, NWRG is exposed to a number of modern slavery risks in our supply chain and operations.

To manage these risks appropriately and improve our actions to address them, we must first understand them, including where we might cause, contribute to or be directly linked to modern slavery.

## 3.1 Modern Slavery Risk Assessment

In FY25, NWRG undertook a reassessment of modern slavery risks **across our business areas**. This assessment provided valuable insights into our operations and supply chain, identifying areas of potential exposure to modern slavery.

### Operational Risk Assessment

In FY25, NWRG undertook a review of its comprehensive operations risk assessment which was prepared in FY23 to identify and mitigate modern slavery risks across its operations. This assessment was carried out as a desktop review led by Edge Impact and informed by publicly available resources such as the Global Slavery Index. NWRG assessed the modern slavery risk associated with its direct workforce, which comprises 25 permanent employees employed under a Management Services Agreement with NWRG. These employees are engaged in professional or technical roles based in Australia, a jurisdiction generally considered to have a low risk of modern slavery. Employees are covered by

comprehensive entitlements, including above-award wages, superannuation, leave benefits, and access to formal grievance mechanisms. These factors informed our conclusion that the risk of modern slavery within our direct workforce is minimal. However, we are acutely aware that the nature and composition of our largely subcontracted workforce requires further assessment, as detailed below.

During FY25, we reviewed our modern slavery operational risk assessment using our existing methodology and current supplier data. No material changes to our overall risk profile were identified.

### Supply Chain Risk Assessment

As modern slavery risks are more likely to arise in our supply chain, we focused our risk assessment in this area. To evaluate supply chain risks in FY25, we revisited the comprehensive supply chain risk assessment which was prepared in FY23 by Edge Impact using their proprietary risk screening tool. This tool draws from best practice global databases, including Exiobase, the Social Hotspot Database, the Global Slavery Index and a comprehensive media and literature review.

Each spend category, including design and construction services, core services fees and infrastructure renewal, was analysed to determine the likelihood of modern slavery risks. The assessment applied a life cycle methodology, which estimates modern slavery risks across global supply chains. The risk was assessed

with a focus on potential harm to people, considering geographic (country level) and product or service specific risks.

This approach adheres to internationally recognised standards and frameworks, reinforcing NWRG's commitment to responsible business practices. Through this assessment, we gained a comprehensive understanding of the modern slavery risks in our supply chain and alignment on pragmatic actions to address identified risks in the future.

During FY25, we reviewed our modern slavery supply chain risk assessment using our existing methodology and current supplier data. No material changes to our overall risk profile were identified.

### 3.2 Our Priority Risk Areas

To better manage our modern slavery risks, we need to understand those specific to our business and the industries we work across. It's important to note that while these risks don't indicate a problem within NWRG, they do highlight the level of potential risk that this impact might occur. Based on these priority risk categories in our services (business operations) and materials (supply chain), we can also identify priority risk factors and how we might directly or indirectly contribute to them.



## Priority Risk Categories: Services and Materials

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), NWRG assesses its modern slavery risks according to the nature of our involvement in those risks:

**Cause:** where our own activities may directly result in an adverse impact on people.

**Contribute:** where our activities may combine with the acts or omissions of others to increase the risk of harm.

**Directly linked:** where risks are connected to our operations, products or services through our business relationships, even if we have not caused or contributed to them.

For NWRG, the majority of risks fall within the category of being directly linked through our supply chain and contracted services. We also acknowledge that in some circumstances we may contribute to risks, for example, if procurement or contracting practices place undue cost or time pressures on suppliers in a way that heightens the likelihood of worker exploitation. In very limited situations, such as where NWRG directly employs or supervises workers without appropriate safeguards, we may cause adverse impacts. While these scenarios are unlikely within our current operating model, we take a precautionary approach by considering them as part of our assessment.

Category	Key Risk Factors	NWRG's Association (UNGP cause / contribute / directly linked)
Design & Construction Services and Materials	Exposure to forced and child labour in raw materials (cement, metals, minerals); complex subcontracting and labour hire; reliance on low-skilled and migrant workers; risk of deceptive recruitment and poor grievance channels.	NWRG is <b>directly linked</b> through contractors and suppliers. It <b>may contribute</b> where procurement practices (e.g. cost or time pressures) increase the risk of exploitative practices in the value chain.
Tolling System Equipment (Services & Materials)	Electronics and IT hardware are high-risk for forced labour in mining and manufacturing (rare earths, semiconductors); long, opaque global supply chains.	NWRG is <b>directly linked</b> through specialist technology suppliers. It <b>may contribute</b> if insufficient due diligence or oversight of supplier practices occurs.
Landscaping (Services & Materials)	Low-wage, seasonal and temporary workforces; high reliance on subcontractors; risk of wage theft, poor conditions, and lack of grievance mechanisms.	NWRG is <b>directly linked</b> through service providers. It <b>may contribute</b> where contract structures do not support adequate oversight of subcontracted labour hire.
Repair & Maintenance (Services & Materials)	Fragmented subcontracting; potential excessive working hours or underpayment in subcontracted trades.	NWRG is <b>directly linked</b> to risks in this sector. It <b>may cause</b> risks in limited circumstances where it directly employs or supervises workers without appropriate protections.
Personal Protective Equipment (Materials)	Known risks in textiles, rubber and plastics; e.g. debt bondage and migrant worker exploitation in gloves and uniforms sourced from Southeast Asia.	NWRG is <b>directly linked</b> through procurement. It <b>may contribute</b> if sourcing decisions are made without applying appropriate due diligence in high-risk jurisdictions.
Operational Management & Control Systems (OMCS)	Electronics and IT hardware risks similar to tolling systems; exposure to complex upstream supply chains.	NWRG is <b>directly linked</b> through suppliers.
Cleaning Services	High-risk in Australia due to subcontracting models, reliance on migrant workforces, night-time work, and wage underpayment.	NWRG is <b>directly linked</b> through contracted cleaning providers. It <b>may contribute</b> if contract pricing or oversight does not support safe and fair working conditions.

Table 2. Services and Materials Key Risk Factors

## Risk Factors: Materials

The construction sector has an **elevated risk** of modern slavery due to its fragmented and complex supply chain and the fact that many stakeholders take part in delivering projects.

The key risks specific to NWRG include forced labour and child labour in the supply chain of materials such as cement, metals and minerals which we use for the maintenance and construction of our assets.

In FY25, we reviewed the modern slavery risk assessment undertaken in FY24 using updated spend data from the current reporting period. No material changes were identified, with 76% of our highest-risk spend remaining concentrated in construction materials and services, including raw material extraction and manufacturing in the design and construction category for the Westlink M7-M12 project.

We recognise that projects carry inherent risks and have established contract mechanisms to help manage them. As part of this, we hold annual review meetings where contractors provide a report that is discussed in detail. In addition to these formal reviews, we maintain ongoing dialogue with contractors regarding risks as they relate to our projects. Through this process, we seek to be clear and transparent about our expectations while also maintaining an understanding of how approaches are being applied on-site.

Whilst 100% of NWRG's materials spend is within Australia, modern slavery risks still occur across various stages of the supply chain. The modern

slavery risk assessment took a life cycle approach to address this and identify potential social impacts such as labour conditions, worker rights and known cases of modern slavery associated with the life cycle of relevant materials and services. In Australia, subcontracting and outsourcing are standard practices, creating elevated risks due to challenges in monitoring and enforcing labour standards throughout the entire chain.

### From the assessment, we identified these high-risk categories:

- Sourcing materials or equipment that are extracted from or manufactured in countries with weak labour regulations;
- Complex and fast-moving global supply chains;
- Reliance on lower-skilled labour across supply chain;
- Absence of grievance mechanisms in manufacturing facilities;
- Lack of transparency across the supply chain at each stage of the product life cycle, shipping and transport;
- Deceptive recruitment practices, including false promises related to wages, working conditions and contract terms.

The following infographic represents the **life cycle of products and materials procured by NWRG** and the risk factors that increase modern slavery risk.



Figure 2. Life cycle of products and materials



# Risk Factors: Services

NWRG relies on many skilled professionals to provide services across our business, including landscaping, construction, hospitality, printing, transport and repairs and maintenance.

Our business comprises of direct and subcontracted labour hire sourced through a Management Services Agreement with NorthWestern Roads Management Services Company (referred to as 'NWR'). Within this subcontracted services supply chain, specific risks exist, including forced labour, where workers may be coerced or forced to work against their will, and wage exploitation and underpayment of workers.

In FY25, we reviewed the modern slavery risk assessment undertaken in FY24 using updated spend data from the current reporting period. No material changes were identified, with construction materials and related services remaining our highest-risk categories (76% of spend).

**Within our service and labour hire spend categories, the assessment identified the following potential risk factors:**

- Difficulty in achieving proper oversight and due diligence on subcontractors;
- Reliance on temporary and migrant workers who may be isolated or face higher risks due to language barriers and unfamiliarity with local laws;
- Use of third-party recruitment;
- Reliance on lower-skilled labour;
- Absence of grievance mechanisms on-site;
- Deceptive recruitment practices, including false promises related to wages, working conditions, debt bondage, and contract terms;
- Retention of identity documents.

This infographic demonstrates the **services procured by NWRG** and the risk factors that increase modern slavery risk.

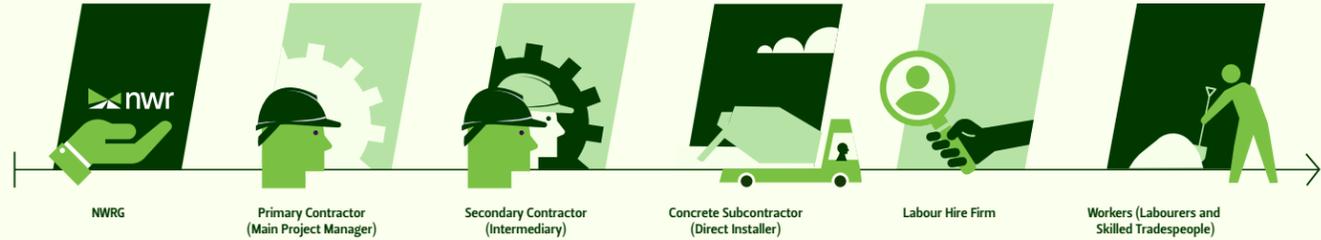


Figure 3. Life cycle of services

## Case Study #2

### Leveraging Trusted Supplier Relationships to Embed Human Rights in Procurement Governance

In FY25, NWRG deepened its engagement with high-risk suppliers by issuing a tailored Modern Slavery Supplier Questionnaire.

A technology provider delivering intelligent transport systems, who is owned by a Norwegian parent company, responded with a detailed submission that demonstrated a mature approach to managing human rights risks. This included alignment with Norway’s Transparency Act, structured supplier audits, mandatory training programs and a formal grievance mechanism.

The engagement went beyond disclosure. The supplier’s willingness to engage in open and transparent dialogue created an opportunity to explore how modern slavery risks intersect with broader contract management. What began as a compliance check evolved into a strategic conversation, allowing NWRG to embed shared expectations throughout the commercial relationship.

This case highlights the importance of strong supplier relationships as a foundation for ongoing, two-way engagement on business and human rights. It also shows how internal tools, such as NWRG’s supplier questionnaire and Code of Conduct, can be used not only to assess suppliers but to strengthen partnerships over time.

NWRG plans to build on this approach in FY26 by refining and expanding the engagement process. This will include applying the model to new procurement categories and integrating human rights considerations into future tender design and contract negotiations.



# /04 Addressing and Mitigating Risks

NWRG understands that our modern slavery risks are constantly evolving, and as such, they require a risk management strategy that adapts to stay ahead of these changes.

Through governance and policies, stakeholder engagement and the creation of a risk management framework, we're proactive about improving how we address and mitigate these risks in our operations and supply chain. As we aim to integrate these considerations into our business, we'll also work toward NWRG's broader goal of managing our assets responsibly, ethically and sustainably.

## 4.1 Governance

Effectively addressing and mitigating the risks of modern slavery in our operations and supply chain requires a collaborative approach across the business, and an understanding that everyone in our team has a role to play. In line with this, our internal modern slavery working group includes representatives from business areas, including asset management, finance, technology, commercial, operations and risk, coordinating its assessment of the overall NWRG risk and engagement with key supply chain partners. Alongside shareholder subject matter experts, the working group informs and advises on risks and impacts to help prepare the annual Modern Slavery Statement.



## Case Study #3

### Building Awareness on Site through Multilingual Poster Development

In FY25, NWRG strengthened on-site awareness of workers' rights by deploying multilingual anti-slavery posters across key operational sites.

This initiative was informed by demographic analysis and supported by visible leadership action.

NWRG accessed anti-slavery poster resources developed by the NSW Anti-Slavery Commissioner, available in more than 25 languages. Recognising the need to reach linguistically diverse workers, the Group Manager of Safety, Sustainability and Stakeholder led efforts to contextualise poster deployment. Rather than applying a generic approach, the team cross-referenced Australian Census data to identify the most spoken languages in the Local Government Areas (LGAs) where NWRG operates, including Blacktown, Fairfield, Hornsby, Ku-ring-gai and Liverpool.

Based on this analysis, posters were prioritised in English, Arabic, Vietnamese, Hindi, Simplified Chinese and Korean, ensuring content was culturally and linguistically relevant. Laminated hard copies were displayed in lunchrooms and depot kitchens at the Westlink M7 and

NorthConnex sites, alongside digital versions shown on rotating display screens. Posters were placed in tiered brochure holders to maximise visibility without overcrowding noticeboards, and the NSW Anti-Slavery Fact Sheet was made available in both hard copy and digital formats.

This initiative demonstrates how practical, data-informed actions can enhance on-site awareness of modern slavery and support workers' access to rights information. It also reflects how NWRG's internal capability is translating into targeted, real-world practice. The decision-making process was proactive, evidence-based and aligned with NWRG's broader modern slavery governance framework.

NWRG will continue to explore the use of informal feedback loops and digital engagement metrics to assess the visibility and impact of these resources on worker awareness and behaviour.

## 4.2 Policies

NWRG has a number of policies and procedures that shape our formal framework for identifying, addressing and reducing risks of modern slavery within our operations and supply chain.

These documents also help our employees, contractors and suppliers understand their responsibility and compliance obligations. We communicate our policies to our employees

and our supply chain workforce through targeted compliance training and communications. Where a breach of our policies (including our supplier code of conduct) occurs, we would build an internal working group of relevant stakeholders to design communications, investigations or corrective action plans as appropriate. As with previous reporting periods, we continuously update our Policy Framework to reflect any changes to modern slavery risks, impacts or legislations.

Policy Tool	Relevance to our Anti-Modern Slavery Approaches
NWRG People Policy	Articulates the requirements for ensuring team members are legally permitted to work in our business, including compliance with relevant visa conditions.
NWRG Code of Conduct	Defines how we do business and outlines the standards of behaviour expected from our team members and leaders.
NWRG Sustainability Policy	Outlines our commitment to respecting human rights, and our pathway to achieving our commitments.
NWRG Purchasing Policy	Declares how purchasing decisions are to be made, including how to consider non-price attributes in our contracting processes.
NWRG Modern Slavery Supplier Questionnaire	A due diligence tool issued during procurement to assess supplier risk. Enables identification of high-risk suppliers based on their responses, informing targeted follow-up and risk mitigation actions.
NWRG Model Contract Clauses	This library of clauses is used in contracts for key materials (either during initial onboarding or renewals) to incorporate requirements to comply with the Supplier Code of Conduct.
NWRG Supplier Code of Conduct	Sets our expectations and requirements on modern slavery, human rights and other key considerations.
NWRG Risk Policy	The Policy outlines strategies and controls for mitigating and managing risks, including consideration of third party reputational and social risks.
NWRG Modern Slavery Risk Register	A risk register that details our latent risk level and category level controls for managing modern slavery risks.
NWRG Whistleblower Policy	Independent service which provides a publicly accessible mechanism to report any breach of the law or NWRG's code of conduct, such as criminal conduct, fraud or unethical behaviour.
NWRG Supply Chain Modern Slavery Remediation Guideline	Outlines how NWRG would respond to, investigate and remediate reports of modern slavery identified in our supply chain.

Table 3. Policy Framework

Our **Modern Slavery Governance Framework** demonstrates how NWRG's stakeholders and business functions are involved in identifying, addressing and managing modern slavery risks.

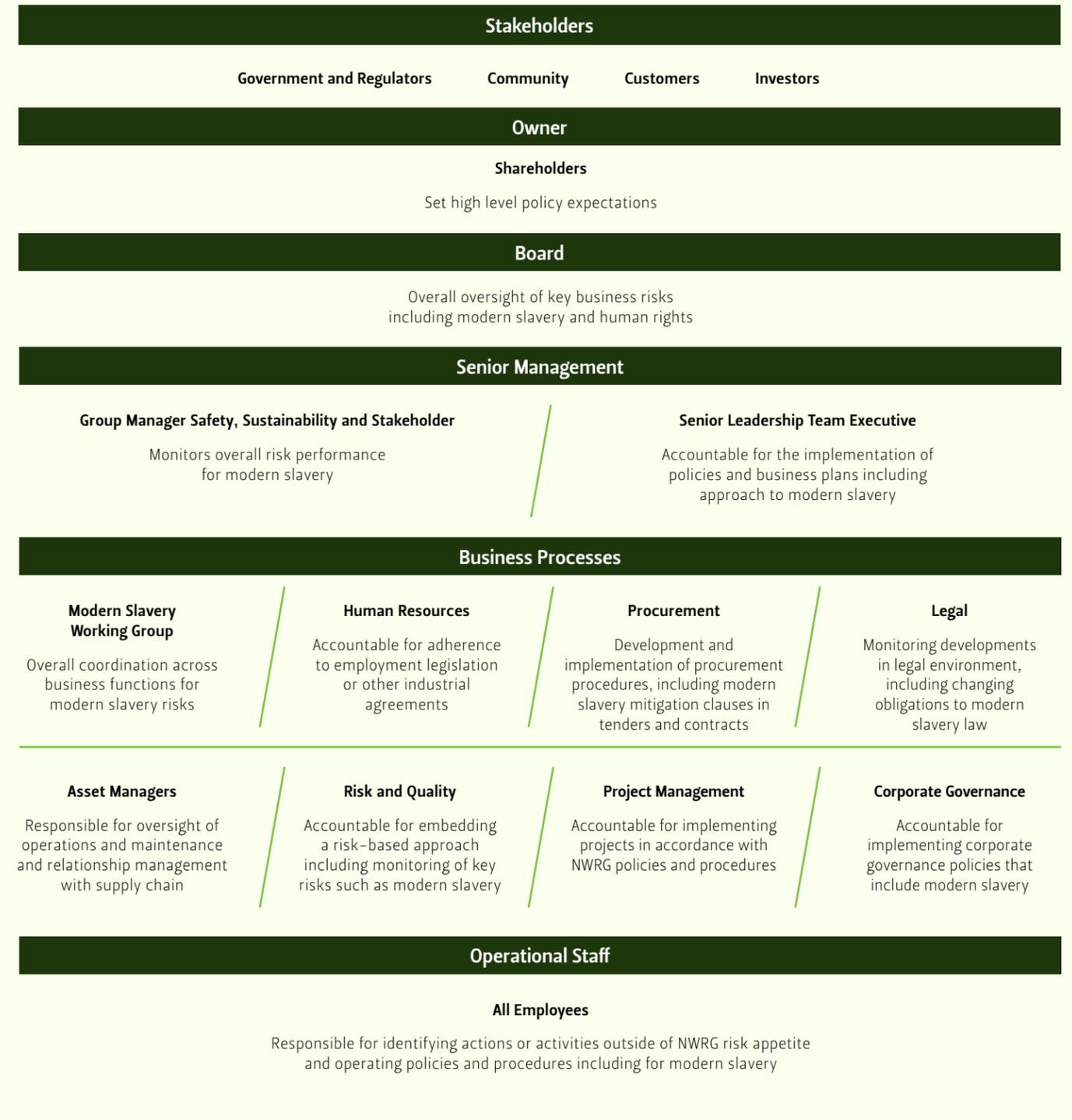


Table 4. Modern Slavery Governance Framework

### 4.3 Capability and Awareness

NWRG understands that improving the skills and capability of our people, including providing specific training on modern slavery, can help us identify and manage these risks more effectively.

#### Modern Slavery Training

Annual modern slavery awareness training is provided to all NWRG employees. Those unable to attend the team session are required to complete the recorded version. The training covers modern slavery risks and key warning signs.



### 4.4 Stakeholder Engagement

Building strong relationships with our partners and suppliers is paramount to understanding and addressing the modern slavery risks in our supply chain. These actions from this Reporting Period were helpful in improving engagement and transparency in addressing modern slavery risks with our stakeholders.

#### Regular Meetings with Key Suppliers

We continued our process of meetings with the operations and maintenance suppliers for NorthConnex and Westlink M7.

As most of our spend is with these suppliers, it's vital we continue to gain insights into their supply chains, including any changes we should be informed of.

#### Modern Slavery Mitigation Clauses in Contracts

Modern slavery clauses have been included into our standard contract template, requiring all new suppliers entering into a contract to align with NWRG's expectations in relation to modern slavery.

NWRG onboarded new technology using its formal procurement process. This required modern slavery documentation and self-assessment questionnaire and follow-up during the tender stage, to assess modern slavery risks. Modern slavery clauses were then added to the supplier contract to ensure ongoing compliance with company standards.

### Case Study #4

#### Reframing the SAQ as a Lifecycle Risk Management Tool

NWRG evolved its use of the Self-Assessment Questionnaire (SAQ) from a one-off screening tool to a resource that supports ongoing supplier engagement and contract management.

While the SAQ was originally designed for supplier pre-qualification, its rollout prompted important questions among staff about how to interpret responses. In particular, teams sought to better understand the difference between genuine action and surface-level compliance. To support this, NWRG developed an Interpretation Guide that helps staff assess supplier responses using behavioural and risk-informed indicators, rather than a binary pass or fail model.

The guide is now being used not only at onboarding but throughout the supplier lifecycle. It informs contract discussions, shapes performance expectations, and helps identify when further engagement or capability-building is needed. The resource gives staff a structured

way to consider contextual factors, such as geographic risk, supplier scale, and response quality, and to determine when additional follow-up is required.

This initiative reflects NWRG's maturing approach to modern slavery risk management. Rather than treating supplier due diligence as a one-time task, the Group is embedding human rights considerations into the full lifecycle of procurement and governance practices.

Suppliers may be re-assessed through a new SAQ if material changes or emerging risks arise, ensuring due diligence remains current and risk-based.



## 4.5 Risk Management Framework

Applying insights from our FY24 modern slavery risk assessment, NWRG developed a due diligence process that informs our risk management framework for suppliers, allowing us to continually evolve and improve our response to modern slavery in our supply chain.

The framework also helps us be as conscientious with new suppliers as we are with existing ones, setting expectations before we commence relationships so that we're aligned on our commitment to human rights.

The level of risk assigned to each supplier determines the due diligence actions we take. As the risk increases, so does the number of actions, the level of assessment and the information we require from the supplier.

The process includes:

- Share our Supplier Code of Conduct;
- Conduct a thorough media and desktop scan of the supplier;
- Ensure there is a preference for certifications in specific categories;
- Complete the "Audit for non-auditors" checklist when visiting factories;
- Request Tier 1 suppliers to share their audits and supply chain findings.



## 4.6 Grievance and Remediation

Integrity is one of our core values, and upholding this value ensures our customers, suppliers, shareholders and employees have confidence in us. As such, we are committed to ensuring our people can freely and safely raise any concerns (including actual or suspected violation of our policies, codes, human rights, labour rights, health, safety and environmental obligations and other business integrity issues. If our people raise concerns, we are also committed to providing for or cooperating in remediation where we have caused or contributed to any adverse impacts. Our grievance and remediation processes provide a framework to deliver on these commitments.

During the reporting period, our grievance and oversight processes did not identify any actual or suspected instances of modern slavery. We recognise this outcome as one indicator of risk, not proof of the absence of harm, and we will continue to mature our approach to monitoring and remediation accordingly.

- **NWRG Whistleblower Service**  
Our independent and confidential whistleblower service is available for anyone aware of, having witnessed or suspecting any reportable conduct. This service also has translation options available. We investigate reports to this service, treating each one seriously and confidentially. The service is available 24/7 on 1800 500 965.
- **NWRG Supply Chain Modern Slavery Remediation Guideline**  
The Guideline outlines our grievance processes and informs NWR employees about how to raise issues and report or respond to concerns, including actual or potential instances of modern slavery within our operations and supply chain.
- **NWRG Grievance and Complaint Handling Procedure**  
Where an instance of modern slavery is raised under our Grievance and Complaint Handling Procedure, our processes ensure that the NWRG Board would be informed within 48 hours, with legal counsel engaged to guide us on the appropriate approach dependent on the nature of the issue.

# /05 Measuring Effectiveness

NWRG measures the effectiveness of its actions by setting clear goals in its highest-risk areas and regularly monitoring progress against them. This involves using both quantitative and qualitative insights to ultimately ensure that the measures we implement improve outcomes for people in our operations and supply chain who may be affected by modern slavery.



## 5.1 FY24's Goals and Progress

Area	FY24 Goal	Progress
Risk Assessment	Refine the procurement process to tailor the shape of tender return schedules based on defined risk profiles.	Procurement process needs to be updated with embedded risk profiles.
	Develop a clear interpretation guide for self-assessment questionnaires (SAQ) and tender return schedules that screen potential suppliers and inform the nature and terms of a supplier relationship beyond contract signing.	Ongoing. Produced defined return schedules. We will work towards training employees responsible for using it.
Governance	Refine and update modern slavery KPIs.	KPIs need to be updated and shared with key stakeholders.
	Update Supplier Code of Conduct.	Ongoing. The Supplier Code of Conduct was updated to include explicit mention of modern slavery elements. We will continue to collaborate and share information with suppliers for more effective identification and remediation of modern slavery cases.
		Conducted a number of supplier surveys.  Displayed modern slavery posters in offices/depots.
Due Diligence	Review supplier onboarding questionnaire.	Ongoing. NWRG Modern Slavery Supplier Questionnaire has been developed and is now in use. We will now review the questionnaire to identify whether we are asking the right questions and next steps to take based on responses.
	Discuss modern slavery provisions in the upcoming onboarding of a new technology supplier.	Complete. Modern slavery clauses have been added to the standard contract clauses template.
Grievance and Remediation	Define informal and formal channels where NWRG may receive grievances.	Ongoing. Have a new standalone whistleblower service. The whistleblower hotline also includes translation services. We will further define grievance pathways to ensure full transparency in this process.
	Develop an approach to improve grievance accessibility with key suppliers and subcontractors in priority high-risk contexts.	Ongoing. Meetings with key stakeholders / suppliers to share information and collaborate. This will work towards creating a communications strategy for grievance pathways.

Table 5. Update on Last Year's Commitments

# /06 Next Steps



## 6.1 Future Commitments

Area	Commitment	Success Criteria
Governance	Refine and update the onboarding process to incorporate modern slavery.	Incorporate modern slavery briefing into new hire onboarding process.
	Refine modern slavery KPIs developed in FY24 and use them to monitor the effectiveness of training and supplier engagement activities.	Refined KPI set endorsed by governance group and reported to key stakeholders.
Stakeholder Engagement	Educate on-site partners on modern slavery, risks and grievance and remediation processes.	Investigate modern slavery education presentation with asset maintenance partners at 'tool box' talks for maintenance and field staff.
Training	Expand the modern slavery training program and deliver a bespoke awareness session to the Board, building on the baseline employee training delivered in prior years.	Board training session delivered and feedback recorded; annual employee completion rate maintained.
Due diligence	Build on FY24's technology supplier review by mapping and assessing secondary agreements to understand potential modern slavery risks within our IT services supply chain.	Complete mapping and risk review of secondary IT service agreements, with any key findings or actions recorded.
	Review and revise subcontractor onboarding materials to ensure clear and consistent understanding of vulnerabilities and expected controls, drawing on the supplier questionnaire and SAQ interpretation guide developed in FY24.	Revised subcontractor onboarding materials approved and in use.
Subcontractor management	Continue embedding risk-based procurement by aligning tender return schedules and onboarding materials with defined supplier risk profiles.	Updated procurement documentation approved and used in upcoming supplier engagements.
Grievance and Remediation	Improve grievance accessibility with key suppliers and subcontractors by implementing the communication and engagement approach developed in FY24.	Accessible grievance pathways communicated to key suppliers and reflected in supplier education activities.

Table 6. Our future roadmap

## Approval

The purpose of this Statement is to provide general information only as required by the Modern Slavery Act and is correct as at the date of publication.

NorthWestern Roads Group Pty Ltd and NorthWestern Roads Group Nominees Pty Ltd (as trustee for the NorthWestern Roads Group Trust) are the parent companies of the reporting entities within NWRG (including, for the avoidance of doubt, all reporting entities listed in this Statement). This Statement was approved by the Boards of the NorthWestern Roads Group, being the principal governing bodies of each of the reporting entities respectively, on 24 November 2025.

*Penny Graham*

**Penny Graham**

Chair of NorthWestern Roads Group