

# Modern Slavery Statement 2022



# CEO message

*Right now, around the world, an estimated 50 million people<sup>1</sup> are trapped in modern slavery, including forced labour. And this form of human rights abuse is increasing over time,<sup>2</sup> including here in Australia.*

The Australian Federal Police received 294 reports of modern slavery and human trafficking in FY22, compared to 224 in FY21.<sup>3</sup> Further, the Australian Institute of Criminology has estimated that, for every one case of modern slavery identified, another four go undetected.<sup>4</sup>

The fact that modern slavery risks can exist in the most everyday business activities is sobering. Whether we're buying goods; using materials or services; or operating our roads—major transport routes used by millions of vehicles every day—it's our responsibility to collaborate and take action on initiatives supporting the eradication of modern slavery.

This is our third modern slavery statement, and this year's statement details our work in refining and enhancing our approach. This included expanding on our training across our business, leveraging human rights experts and collaborating with our suppliers to raise awareness.

We developed a business leadership group to provide additional governance, guiding and supporting how we identify, assess, and respond to potential modern slavery risks.

We also increased our engagement with industry partners and peers to share knowledge and collaborate on actions to raise awareness upstream through our supply chains.

In FY22, Transurban did not identify any instances of modern slavery in our operations or supply chain. We acknowledge this does not mean modern slavery was not present, and that we are still evolving our ability to identify actual or potential modern slavery instances in our operations and supply chain, as well as situations which may occur on our road network.

Looking ahead, we will expand the work we have done so far and will continue sharing knowledge with our industry partners to respect and protect human rights.

A handwritten signature in black ink, appearing to read "Scott Charlton".

**Scott Charlton**  
*Chief Executive Officer*

<sup>1</sup> International Labour Organization, Walk Free, and International Organization for Migration, Global Estimates of Modern Slavery, Forced Labour and Forced Marriage, 2022, p2

<sup>2</sup> As above

<sup>3</sup> Australian Federal Police, Reports of Human Trafficking and Slavery to AFP reach new high, accessed September 2022

<sup>4</sup> Australian Institute of Criminology, Estimating the dark figure of human trafficking and slavery victimisation in Australia, February 2019

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## Our broader sustainability efforts

We report on our environmental, societal, governance and sustainability performance via our corporate reporting suite.

This suite includes:

### **FY22 Corporate Report<sup>1</sup>**

The holistic performance of Transurban in FY22 including our Financial Statements and Sustainability Supplement.

### **FY22 Sustainability Data<sup>2</sup>**

Our progress against the UN Sustainable Development Goals (SDG) and other sustainability performance data.

### **Corporate Governance Statement**

Statement made in accordance with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition).

### **FY22 Climate Change Disclosure<sup>2</sup>**

Our response to the Task Force on Climate-related Financial Disclosures' (TCFD) recommendations.

### **Reconciliation Action Plan**

### **Financial Inclusion Action Plan**

 All available on our website  
[transurban.com](http://transurban.com)

 Our Insights hub website provides detailed information on our safety and sustainability approaches and performance.

See [insights.transurban.com](http://insights.transurban.com)

## **Acknowledgment of Country**

*Transurban acknowledges the Traditional Owners of the lands across Australia—in particular where we own and operate toll roads—and we pay respect to Elders past, present and emerging.*

*As caretakers and custodians of transportation in urban communities we have a deep respect for Indigenous communities and culture and seek to celebrate pride in Country through engagement with, and providing opportunities for, Aboriginal and Torres Strait Islander peoples. We also celebrate connection to Country through artwork and design elements in our infrastructure.*

*To achieve our purpose—to strengthen communities through transport—we will continue to foster positive and sustainable relationships with all communities, while progressing our efforts to contribute to Australia's reconciliation journey.*

## **Transurban reporting entities under the Act**

This statement is prepared for the purposes of the *Modern Slavery Act 2018* (Cth) (Act). This is a joint statement by each of the reporting entities under the Act within the Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group, as defined in Appendix A, and each of their respective owned and controlled subsidiaries. For the purposes of this statement, 'Transurban' collectively refers to Transurban Parent Group, Transurban Queensland Group and the Airport Motorway Group.

The WestConnex Group, Sydney Transport Partners and NorthWestern Roads Group (in which Transurban holds an interest) will be lodging their own modern slavery statements under the Act. The Transurban Sustainable Procurement Program (the Program) has been deployed across the WestConnex Group, and is being managed by the Transurban-led Procurement team. As a result, there is a substantial amount of overlap across each of these statements. Statistics and data presented in this statement include these businesses unless otherwise stated.

<sup>1</sup> We have integrated some of our Sustainability Supplement into our FY22 Corporate Report. This approach provides additional information on our non-financial performance (including environmental, social and governance performance) and our progress in achieving our Sustainability Strategy

<sup>2</sup> Previously incorporated in our Sustainability Supplement

# FY22 in review

## FY18

Transurban Sustainable Procurement Program established and aligned to ISO 20400:2017. Commenced working with our suppliers in anticipation of the Act being passed through Parliament.

## FY19

Joined the UN Global Compact Network Australia's Modern Slavery Community of Practice. Partnered with the Infrastructure Sustainability Council (ISC) to establish the Modern Slavery Coalition.

## FY20

Established a leadership role dedicated to Sustainable Procurement. Implemented new policies, procedures, and contractual terms to better address our risks. Our people and supplier partners engaged in modern slavery awareness training and workshops.

## FY21

Published our inaugural Modern Slavery Statement (FY20). Developed an operations pilot program to support our incident responders to better identify and respond to potential instances of modern slavery within our road asset operations.

## FY22

Published our second Modern Slavery Statement (FY21). Reviewed and strengthened tools and processes used to assess and address modern slavery risks. Piloted first responders training to identify and escalate potential or actual instances of modern slavery.

*Modern slavery involves the exploitation of human beings, and Transurban recognises that we have a responsibility to respect human rights including freedom from all forms of abuse that make up modern slavery.*

As part of this responsibility, we are continuously improving our understanding and mitigation of the risks of modern slavery occurring within our operations and supply chain. During the 2021–22 financial year (FY22), we progressed multiple initiatives designed to enhance our understanding of and responses to—modern slavery risks.

This is our third Modern Slavery Statement published in accordance with the Act. During the FY22 reporting period we endeavoured to build on the actions we reported in our previous statements.

During FY22 we:

- reviewed our efforts to date to assess and address modern slavery risks
- integrated our current actions and tools into our operations to improve their efficacy
- increased our people's awareness, engagement and training.

Key actions we took included:

- formalising our governance leadership group that works internally to transform and embed actions we take to assess and address modern slavery risks (see [page 16](#))
- refining our risk management approach by aligning and optimising the tools we use to enhance how we identify modern slavery indicators and use these indicators to prioritise our actions to address these risks (see [page 18](#))
- providing increased training to targeted internal teams to enhance their knowledge of modern slavery, in their specific areas, including piloting training with a group of our Traffic Control Room Officers (TCRO) and Incident Response Crew (IRC) to aid in identifying potential or actual situations of human trafficking (see [page 20](#))
- engaging with various stakeholders to share knowledge and promote industry-wide actions to tackle modern slavery (see [page 24](#)).

**In FY22, Transurban did not identify any instances of modern slavery** in our operations or supply chain. We acknowledge that this does not mean modern slavery was not present, and we are still evolving our ability to identify actual or potential modern slavery instances in our operations and supply chain, as well as situations which may occur on our road network

**More than 99% of our direct spend** was with Tier 1 suppliers who are located in the countries where our operations are based—Australia, Canada and the United States

**We piloted training**, the first of its kind in Australia, to a group of our TCRO and IRC team members providing them with skills to identify and escalate potential or actual instances of human trafficking occurring on our motorways

\*\*Any reference to “risks” within this statement refers to the modern slavery risks to people unless otherwise described. For more information on Transurban’s corporate and sustainability risks and responses see our [FY22 Corporate Report](#)



# Our values

*Transurban's values set the agenda for the way we work and how we interact with all our stakeholders. Together these values set the foundation for our work on modern slavery risk management and, more broadly, our overall respect for human rights. Our values are:*



**Integrity**



**Collaboration**



**Accountability**



**Ingenuity**



**Respect**

Our purpose—to strengthen communities through transport—underpins everything we do. From our traffic control room operators who monitor our roads 24/7, to our traffic planners who interrogate travel data to forecast where congestion hot spots could be in a decade's time, our team is focused on making travel easier now and in the future.

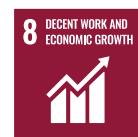
We continually challenge ourselves in how we respond to social and environmental issues and we invest in both to create social inclusion and manage our environmental impacts.

The way we approach our efforts in tackling human rights and modern slavery risks, reflects our values of integrity, respect, accountability, collaboration and ingenuity.

We are increasingly integrating sustainability into our business strategy, planning, operations and supply chain management activities. We also work to make meaningful contributions to the United Nations' Sustainable Development Goals (SDG). Assessing and addressing both our human rights impacts and our modern slavery risks are important parts of this work.

We have identified nine UN SDGs that are most relevant to our business, and we report annually on how we are contributing to these global goals.

 [Read more on our Insights hub, insights.transurban.com](https://insights.transurban.com)



# Our structure and operations

**21**  
assets in  
operation

**7**  
major infrastructure  
projects in  
development

**2M**  
trips daily across  
our roads

**9.7M**  
customers  
globally

**1996**  
listed on  
the ASX

**2<sup>nd</sup>**  
highest rated  
motorway  
infrastructure  
company – GRESB for  
infrastructure 2021

**>330km**  
of roads including  
tunnels, bridges,  
and ramps

As one of the world's largest toll road developers and operators, our business is to get people where they want to go as quickly and safely as possible. The employees in our operations across Australia and North America work in close partnerships with governments, our suppliers and business partners to deliver major infrastructure projects and operate motorways. We seek to foster an engaged and diverse workforce that prides itself on making significant and lasting contributions to the cities and communities in which we operate.

 Montreal, Canada	One office site
A25	100% Transurban
 Greater Washington area, USA <sup>1</sup>	
Two offices and one shared office site (not-operated)	
495 Express Lanes	50% Transurban 25% AustralianSuper 15% CPP Investments 10% UniSuper
95 Express Lanes	50% Transurban 25% AustralianSuper 15% CPP Investments 10% UniSuper
395 Express Lanes	50% Transurban 25% AustralianSuper 15% CPP Investments 10% UniSuper
Capital Accord Beltway	50% Transurban 25% AustralianSuper 15% CPP Investments 10% UniSuper
Phase 1 Maryland Express Lanes Project	60% Transurban 40% Macquarie



 Project

 Click the location names for detailed maps and information

<sup>1</sup> From 18 August 2021 Transurban holds a 60% interest in the Phase 1 Maryland Express Lanes Project in Maryland, USA

<sup>2</sup> Transurban Group proportional ownership of WestConnex increased from 25.5% to 50% from 29 October 2021

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

 **Brisbane, Australia** Four office sites and one depot

● <b>Gateway Motorway</b>	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● <b>Logan Motorway</b>	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● <b>Clem7</b>	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● <b>Go Between Bridge</b>	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● <b>Legacy Way</b>	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed
● <b>AirportLinkM7</b>	62.5%	Transurban
	25%	AustralianSuper
	12.5%	Tawreed

 **Sydney, Australia** Eight office sites and one depot

● <b>M5 West</b>	100%	Transurban
● <b>Hills M2</b>	100%	Transurban
● <b>Lane Cove Tunnel</b>	100%	Transurban
● <b>Cross City Tunnel</b>	100%	Transurban
● <b>Eastern Distributor</b>	75.1%	Transurban
	14.37%	IFM Investors
	10.53%	UniSuper
● <b>Westlink M7</b>	50%	Transurban
	25%	CPP Investments
	25%	QIC Limited
● <b>WestConnex M8<sup>2</sup></b>	50%	Transurban
	20.5%	AustralianSuper
	10.5%	CPP Investments
	10%	CDPQ
	9%	Tawreed
● <b>WestConnex M4<sup>2</sup></b>	50%	Transurban
	20.5%	AustralianSuper
	10.5%	CPP Investments
	10%	CDPQ
	9%	Tawreed
● <b>WestConnex M5 East<sup>2</sup></b>	50%	Transurban
	20.5%	AustralianSuper
	10.5%	CPP Investments
	10%	CDPQ
	9%	Tawreed
● <b>NorthConnex</b>	50%	Transurban
	25%	CPP Investments
	25%	QIC Limited
● <b>WestConnex M4–M8 Link<sup>2</sup></b>	50%	Transurban
	20.5%	AustralianSuper
	10.5%	CPP Investments
	10%	CDPQ
	9%	Tawreed
● <b>WestConnex Rozelle Interchange<sup>3</sup></b>	50%	Transurban
	20.5%	AustralianSuper
	10.5%	CPP Investments
	10%	CDPQ
	9%	Tawreed

 **Melbourne, Australia** Three office sites and one depot

● <b>CityLink</b>	100%	Transurban
● <b>West Gate Tunnel</b>	100%	Transurban



# Our corporate structure

Transurban operates under a stapled structure and our triple-stapled securities trade on the ASX under the code "TCL". Each of our stapled securities comprises a share in Transurban Holdings Limited (THL); a unit in Transurban Holdings Trust (THT); and a share in Transurban International Limited (TIL). Each THL and TIL share and THT unit is quoted and traded as a single security on the ASX. They cannot be traded separately. THL, THT and TIL are governed by boards with common membership and are managed by the same senior management team. Controlled entities within Transurban include corporate entities domiciled and incorporated in Australia, the United States and Canada.

Transurban road assets are, in general, owned and operated through individual subsidiary companies and are linked to a trust structure.

For the purposes of reporting under the Act, Transurban has 19 reporting entities. Individual reporting entity information is provided in Appendix A.

In FY22, as part of the Sydney Transport Partners consortium, the remaining 49% of WestConnex was acquired from the NSW Government, taking Transurban's total ownership interest to 50%. Once complete, WestConnex will form a 70-kilometre network, providing efficient and safer travel between industrial and freight hubs as well as catering for Sydney's growing western suburbs.

## Statement coverage

This statement covers the three Transurban groups as described below. All three groups develop projects and manage motorways via shared systems and risk management processes. The groups therefore use broadly similar operating approaches, including in how they work with supply chains.

## Transurban Parent Group

For the purposes of this FY22 Modern Slavery Statement, 'Transurban Parent Group', refers to the parent entity, THL, and the stapled entities TIL and Transurban International Management Limited (TIML) as the responsible entity of THT, as well as the following subsidiaries: CityLink Melbourne Limited; The Hills Motorway Limited; and Interlink Roads Pty Limited.

Transurban Parent Group, under the entity TIL, owns and controls entities in the United States and Canada.

*In FY22, as part of the Sydney Transport Partners consortium, the remaining 49% of WestConnex was acquired from the NSW Government to take Transurban's total ownership interest to 50%. Once complete, WestConnex will form a 70-kilometre network, providing efficient and safer travel between industrial and freight hubs as well as catering for Sydney's growing western suburbs.*

See Appendix A for further details regarding the reporting entities held by the Transurban Parent Group and reported against in this statement.

## Transurban Queensland Group

Transurban Queensland Group forms part of the wider Transurban corporate group and operates toll roads in Queensland, Australia. Transurban Queensland Group is owned by a consortium comprising Transurban (62.5%), AustralianSuper (25%) and Tawreed Investments, a wholly owned subsidiary of the Abu Dhabi Investment Authority (12.5%).

See Appendix A for further details regarding the reporting entities held by Transurban Queensland Group and reported against in this statement.

## Airport Motorway Group

Airport Motorway Group includes Airport Motorway Pty Limited, the owner

and operator of the Eastern Distributor Motorway in Sydney. Airport Motorway Group is a joint venture between Transurban (75.1%), IFM Investors (14.37%) and UniSuper (10.53%).

See Appendix A for further details regarding the reporting entities held by Airport Motorway Group and reported against in this statement.

For more information on our operations, including our executive team and assets, see our [FY22 Corporate Report](#) at [transurban.com](http://transurban.com)

## External lending activities

Transurban does not engage in external lending activities. It does, however, have minority investments in non-core road operating assets.



# Our operations

Transurban's toll roads provide key transport connections for people and freight in major cities and regions across Australia, the United States and Canada. We work in partnership with governments, business partners, suppliers and other stakeholders to provide critical infrastructure that creates long-term benefits for our customers and for the communities in which we operate.

Beyond the road infrastructure we build and operate, we also deliver parks, cycling and pedestrian paths, playgrounds and public art. These initiatives contribute to the long-term liveability of local communities and enhance cities' overall active transport options. We engage with local communities to ensure we deliver assets communities want and value.

We collaborate with our contractors and sub-contractors to develop our projects in line with applicable government technical and social procurement requirements. Once a newly built road is commissioned into service (including being integrated into the wider network) we operate the road using state-of-the-art technology designed to provide safe and efficient traffic flows.

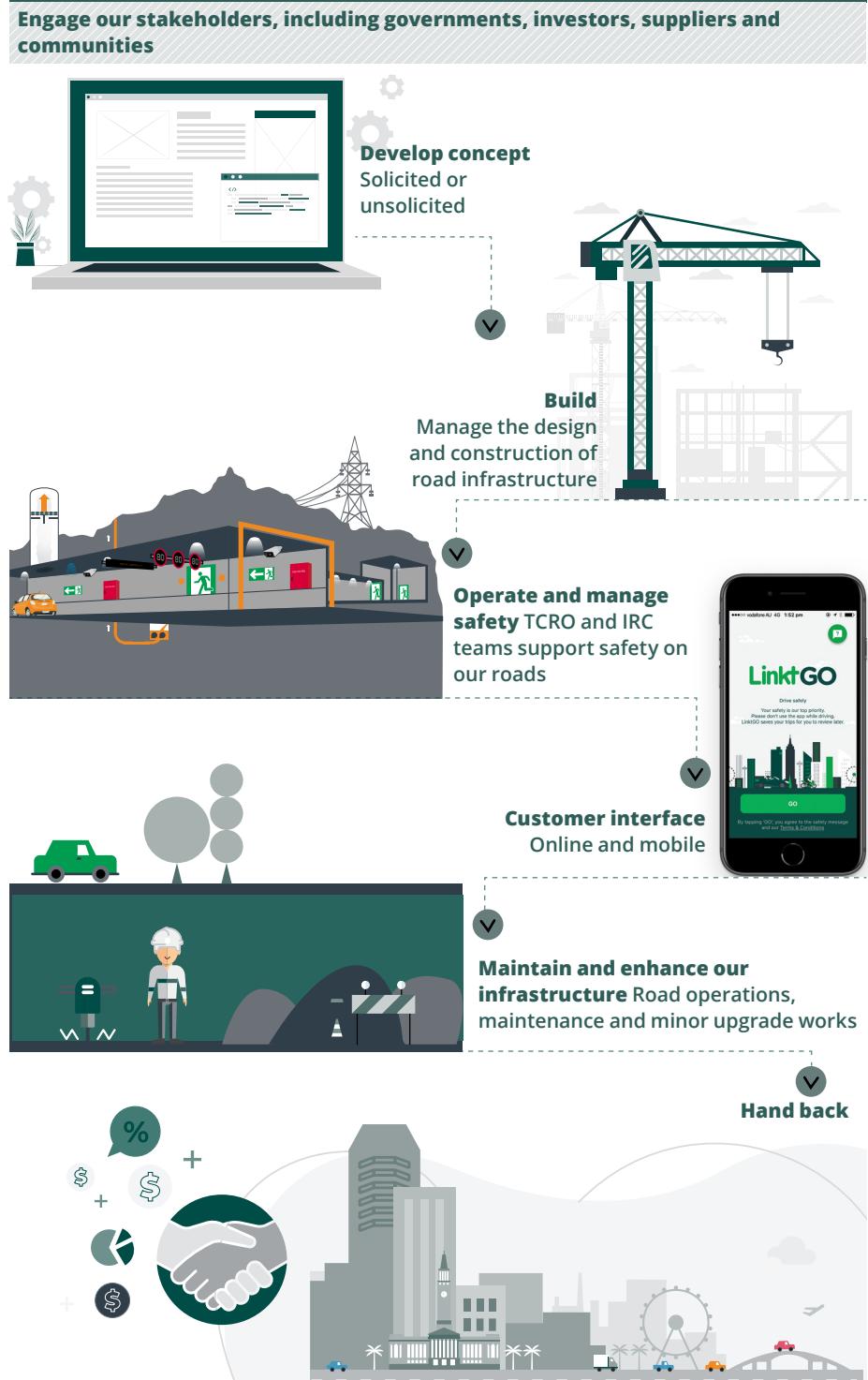
Our teams of TCROs monitor our roads 24/7, working closely with our suppliers' IRCS. IRCS respond to incidents to maintain safe and efficient operations and to support impacted customers.

Transurban operates more than 330 kilometres of road infrastructure which includes 10 tunnels and five bridges. Together with our suppliers, we manage the maintenance and operations over concession periods currently averaging approximately 30 years. At the conclusion of the applicable concession period, assets are handed back to the relevant governing state.

## Our customer brands

Our customers largely manage their toll accounts online or via mobile apps, where they can also access information on: toll pricing and trip costs; travel time savings; road incident notifications; and greenhouse gas emission savings. Transurban's customer brands are shown below.

*Figure 1: Asset lifecycle overview*



### Australia

**Link**

### United States

**GoToll**

### Canada

**A25**  
THE SMART LINK

More than

**3,600**

people in the  
direct workforce<sup>3</sup>

## Our people

Transurban's direct workforce comprises more than 3600 people across Australia and North America. Our people work flexibly, primarily from our 22 corporate offices<sup>1</sup> or site locations<sup>2</sup> as well as remotely. Our people are involved in a broad range of activities including toll road operations and maintenance, major road project delivery, customer service and head office functions such as Customer and Technology, Legal, Risk, HSE, Facilities, Finance, Procurement, Corporate Affairs, Sustainability and People and Culture.

Our workforce is predominately made up of highly skilled workers. In Australia, our employees are covered by industrial instruments including modern awards, Enterprise Agreements, and individual employment contracts. Each of these mechanisms meets or exceeds the minimum entitlements prescribed under the National Employment Standards. The standards set out the 10 minimum employment entitlements that must be provided to all Australian employees.

Transurban directly employs a small number of workers who are visa holders. These employees are skilled workers, each having direct employment contracts with Transurban. These employees have the same entitlements as Transurban's domestic resident employees, including: access to grievance channels; training on how to use these mechanisms; options for raising concerns anonymously.

<sup>1</sup> Three sites are operationally managed by external organisations. Transurban employees may also operate from other sites on connected asset networks other than these, Transurban, managed sites

<sup>2</sup> Sites include depot locations that are not offices

<sup>3</sup> As at June 30, 2022. Direct workforce includes 1925 employees (which include casual, fixed term and permanent employees (excluding leave of absence and non-executive directors)) as well as temporary workers and over 1700 workers contracted through our partner organisations. Transurban shares a number of its employees, management and executives across the WestConnex business

<sup>4</sup> Valid visa types with permission to work. Remaining direct employees have appropriate working rights through citizenship or permanent residency

**90:9:1**

% of direct employees across  
Australia, US and Canada

**93:6:1**

% of full-time, part-time  
and casual direct employees

**71**

direct employees  
who are visa holders<sup>4</sup>



# Our supply chain<sup>1</sup>

*We operate 21 roads and have seven projects in development or delivery. In our work we partner with a diverse range of suppliers including global multinational construction contractors, key technology providers, consultants and local and social enterprises.*

Our supply chains are complex networks of large, medium and small businesses providing goods and services to support Transurban throughout the entire lifecycle of building, operating and maintaining critical infrastructure.

In FY22, in comparison to previous reporting periods, our business did not have any significant changes<sup>2</sup> in the types of goods or services that we procured. During the reporting period, Transurban directly engaged with more than 1,600 direct suppliers.

Our top supply chain categories for FY22, comprising more than 82% of our total spend were:



## Major project construction

Design and construction of new or enhanced roads. Typically, Transurban will select a lead Design & Construction (D&C) supplier (or consortium) for each project, who will then manage delivery, including appointing numerous subcontractors as necessary, with overarching management of the projects led by Transurban.

The activities and materials in our major projects include drilling, piling, excavation and tunnel boring, which includes the use of heavy machinery. Mechanical and electrical trades including wiring, lighting, pumps, jet fans and installation of our deluge, ventilation and Intelligent Transport Systems (ITS). Engineering, project management, wire mesh, shotcrete and concreting (both precast and in-situ), asphalt (pavement) laying and painting are also involved.



## Operations and maintenance

Provision of ongoing works on our road assets to manage safety and operating standards in line with regulatory and concession deed requirements. Typically, Transurban will select an Incident Response and Maintenance service provider for each motorway, who will then tailor the delivery of services including civil, mechanical and electrical, and incident response services. This service provision may include appointing subcontractors as necessary. The operations and supply chain maintenance also includes similar supplier engagements as used above during construction, as the road assets are repaired and maintained throughout their lifecycle.



## Professional services and consulting

Provision of various corporate management consulting services. These are predominantly desktop-based and include legal, strategy and general business and financial consulting services.



## Technology

Information and communications technology hardware, ITS hardware and software, technology consulting services, maintenance, support and software including application licenses for our head office and operations, including our online and mobile apps.

<sup>1</sup> All data in this section excludes the WestConnex group

<sup>2</sup> Tunnelling on our West Gate Tunnel project in Melbourne did begin in FY22 after we reached agreement with the Victorian Government and our subcontractors over a dispute relating to soil disposal

More than  
**\$1.3B**  
in annual managed spend  
**1,600+**  
direct suppliers<sup>1</sup>

More than  
**84%**  
spend with Australian suppliers

We used approximately 500 alternate suppliers<sup>3</sup> during FY22, compared with the previous reporting period. This represented roughly 8% of our total spend.

In FY22, more than 99% of our annual spend was with suppliers whose direct trading site or headquarters were located in either Australia, the US or Canada. However, Transurban recognises that the vulnerability of the labour work force may be greater in the upstream supply chain that Transurban does not have direct involvement with.

Labour is a critical part of the direct and indirect supply chain to Transurban, from the maintenance activities on our roads such as landscaping, electrical and mechanical trades, incident response teams, machinery operators, to labour used in the multi-year construction phases of our infrastructure projects, such as truck drivers. Some labour is provided by casual or migrant labour, with labour potentially delivered in shifts. This type of labour may be used during major project construction activities such as 24/7 tunnelling works. In addition, the maintenance of our road assets often occurs overnight to mitigate disruption for motorists.

We continue to narrow our focus to identify the risks to vulnerable groups and improve our controls to protect people in our supply chain.

## Managing our supply chain

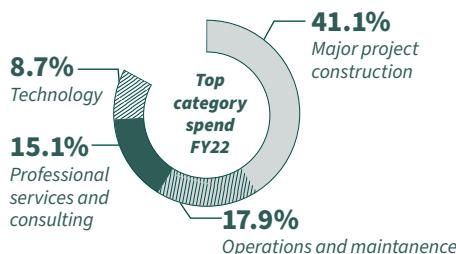
As noted in our previous Modern Slavery Statements, we have specific teams tasked with managing the supply chain activities across our major projects, and our operational procurement activities.

During FY22, we employed a new Sustainable Procurement Manager, who provided Transurban the opportunity to review processes and actions completed to date and provided advice on future direction

**Figure 2: Spend by Region**



**Figure 3: Spend by Category**



in how we assess and address the risks of modern slavery across our operations and supply chains.

## Extended supply chains beyond Tier 1

Across the Transurban business we have various levels of knowledge into our extended supply chains beyond our direct contracted suppliers, which we define as Tier 1. Some subcontracted suppliers, beyond Tier 1, are known through requirements in our commercial arrangements, where our Tier 1 suppliers are required to disclose and report on detailed information regarding these subcontractors, including the labour force. In some instances, our Tier 1 suppliers may also be involved in other scope of works where they act as Tier 2 subcontractors in our supply chain.

Through our sustainable procurement program, we also develop shared-value initiatives in collaboration with our Tier 1 suppliers to engage with social enterprises in

## Our supply chain numbers

**Over 1,600**  
suppliers

**Over 84%**  
of spend with Australian suppliers

**99.7%**  
spend in countries where we operate

**18**  
countries our direct suppliers are located in

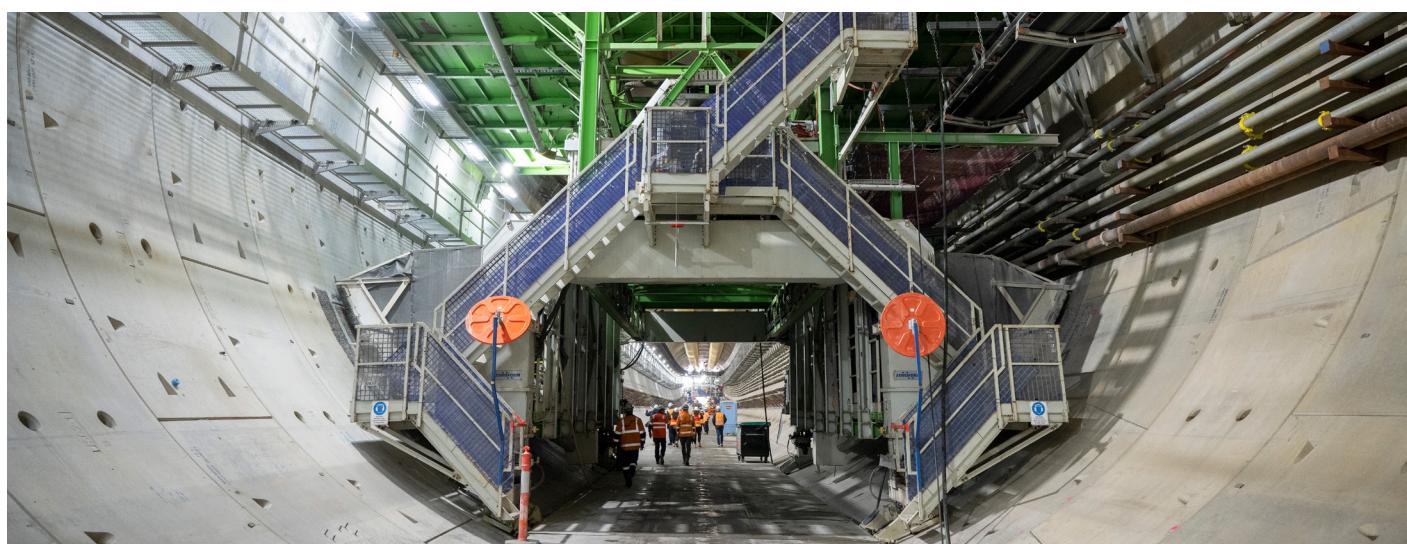
our extended supply chains. These initiatives help vulnerable people in the community participate in meaningful long-term employment.

In this statement, we have noted where we are working to capture and assess relevant information on our extended supply chains. We seek to use this information to continuously assess the saliency of risks, collaborate with our supply chain eco-system and adapt our actions to reduce the risks to people.

## Transurban entities without supply chains

Transurban has a number of entities, including reporting entities, that do not engage with suppliers to purchase goods or services and do not have direct supply chain exposure to modern slavery risks.

<sup>3</sup> Alternate suppliers include new suppliers, as well as others who may have been used by Transurban's entities in prior years and previously onboarded



# Modern slavery risks

*The safety of people is one of Transurban's core focuses. This extends to the fundamental principle of protecting people in our operations and those working in our direct and extended supply chains from the risks of modern slavery.*

Transurban recognises that we have a responsibility to take steps to identify the risk of modern slavery within our operations and across our supply chain. As such, we seek to assess relevant risks in alignment with the 'continuum of involvement framework', described in the UN Guiding Principles on Business and Human Rights (UNGPs). Using this framework, Transurban has assessed how it may cause, contribute, or be directly linked to potential or actual instances of modern slavery which we have described in this section.

## Risk landscape

During the reporting period, we continued to see the impact of COVID-19 across our operations, supply chains and the communities in which we operate. These impacts increased the vulnerabilities of people, including displacement, inability to freely move, increased cost pressures and a shortage of workers.

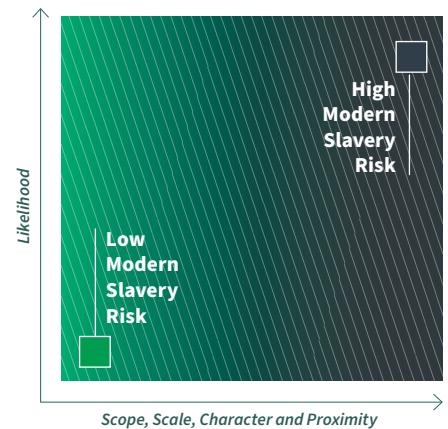
Geo-political threats, conflict, severe environmental impacts, both domestically and internationally are also anticipated to have added to the vulnerability of people in the communities and disrupted supply chains. These situations create opportunities for perpetrators to engage in labour exploitation, preying on these vulnerabilities to potentially engage in modern slavery practices.

## Risk assessment methodology review

During FY22, we reviewed the risk assessment methodology and tools we have been using since 2019. This review included an assessment of the source information, as well as the methodology used to determine the allocation of risks. Along with continued monitoring of public media sources, academic reports, feedback via our whistleblower service and global legislative developments (which may have an impact on the changes in our risk landscape), we found that the sources of information used to input into our Sustainable Procurement Risk Heat Map continued to be the most accurate to support our assessment methodology.

Our risk assessment processes have been adapted from Transurban's Enterprise Risk Management framework<sup>1</sup> and draw added insights from ISO 20400 Sustainable Procurement guidelines as well as the UNGPs. The methodology of the Sustainable Procurement Risk Heat Map looks at the scope and scale of potential adverse human rights and modern slavery impacts (based on vulnerability of population) and the irremediable character of these impacts (severity). It also considers the proximity to Transurban, and whether we may cause, contribute, or be directly linked to adverse human rights impacts, and the likelihood of these occurring.

**Figure 4: Example of Transurban's Sustainable Procurement Risk Heat Map matrix**



🔗 See the application of the Sustainable Procurement Risk Heat Map outlined in our [FY21 Modern Slavery Statement](#)

## The framework of involvement

The UNGPs describe three ways an enterprise may be involved in human rights abuses, which include modern slavery. This is known as the 'continuum of involvement', and outlines not only the ways in which an enterprise may be connected to human rights abuses, but also provides guidance and expectations to enterprises in how they should provide remedies for situations based on their involvement.

- An enterprise may cause modern slavery directly, for example, if it was to engage in forced labour directly in its operations.
- An enterprise may contribute to modern slavery, for example, if the enterprise's actions, such as contract negotiations, influenced a supplier to use modern slavery practices to provide the required work, such as debt bondage.

- An enterprise may be directly linked to modern slavery if, for example, it unknowingly engages with a supplier who uses modern slavery practices in the goods or services it provides, which could include deceptive recruiting for labour or services.

<sup>1</sup> Transurban's Risk Management details can be found on [FY22 Corporate Report](#)

## Risk assessment outputs

### Operations

We have assessed that there is a low risk to people of Transurban causing or contributing to modern slavery in our operations, due to a number of factors. These include the country locations of where our operations occur which are considered to be in jurisdictions with low risks of modern slavery and have strong employment laws. Our direct employees have formal contractual arrangements and are guided by internal policies, principles and practices. In addition, we raise awareness and deploy training across our operations which provide employees with knowledge of rights, freedoms and access to grievance channels.

Transurban has policies and processes (see [page 16](#)) to help mitigate potential modern slavery risks relating to our broader operations, and we continue to monitor and measure compliance with these requirements. In addition, we engage with senior leaders in our Sustainable Procurement Business Leadership Group where we keep key personnel updated on the evolving risks of modern slavery and assess our actions in response to these risks (see [page 16](#)).

Our potential involvement in modern slavery risks to people in our operations principally relates to our four employment entities. These are the only entities within our corporate structure that employ staff. The majority (~86%) of employees are employed by Transurban Limited.

Transurban has identified that certain vulnerable groups exist across our employment sphere. As at the end of FY22, these included:

- **Visa holders:** we have 62 employees on visas in Australia, seven in the United States and two in Canada
- **Part-time employees:** we have 96 part-time employees in Australia and one in the United States
- **Casual employees:** we have 24 casual employees in Australia and one in the United States

All Transurban employees are free to engage in collective bargaining, can leave their employment without material restrictions, and have access to workplace training which raises awareness of their rights and responsibilities including Ethical Business Practises, Code of Conduct and Modern Slavery training. In addition, employees are trained on how to access whistleblowing services and grievance channels, (see 'Grievances and remedy' section on [page 21](#)).

### Supply chain

We consider Transurban's more inherent risks of involvement in modern slavery may occur through being directly linked to adverse impacts through our supplier relationships. Therefore, our work to assess and address our modern slavery risks continues to prioritise the goods and services we procure through our supply chain relationships and activities.

Given the size and complexity of our supply chain, we engage with our Tier 1 suppliers as our primary avenue to collaborate on actions to assess and address modern slavery in our collective supply chains. Together, we continue to build our understanding of the activities that occur beyond Tier 1 and support our suppliers and industry partners to understand the modern slavery context in which they operate.

In all of the identified categories on this page, it is unlikely that Transurban would cause or contribute to these potential risks. We could be directly linked to these modern slavery risks to people, through our supply chains, and these circumstances could be enabled to flourish through the direct actions of our suppliers on their supply chain actors, or more indirectly by Transurban applying downward influence on suppliers which may in-turn drive negative impacts to vulnerable people.

In our previous statements, 17 categories of spend were identified for Transurban to prioritise our efforts, based on the saliency of these risks. During the reporting period, Transurban began to further assess the risks and take actions against our second-highest tranche of modern slavery risk categories, which includes security services. More information on actions taken to conduct due diligence on these risks can be found in the case study on [page 19](#).

At Transurban, we continuously assess the risks of modern slavery occurring in our operations and supply chains. In FY22 no new risks were identified. The Sustainable Procurement Risk Heat Map continued to be the most relevant and accurate assessment of the salient risks to people, which are:

### High-risk spend categories



#### Onsite cleaning services

Cleaning services are a high-risk category due to the industry's reliance on foreign migrants, visa holders, gig-workers and subcontracted labour, all groups who are vulnerable to modern slavery and human rights abuses such as debt bondage, forced labour and coercive and exploitative situations. The industry's historical operational practices are another contributing factor. In consultation with our contracted suppliers, we have sought to address these risks. However we remain vigilant; as this industry remains high-risk due to its labour sources and established operational practices.



#### Construction materials

Construction materials used in our major projects, or operations and maintenance have been prioritised due to the raw materials and components used which may be assembled in, or originate from countries with increased vulnerabilities of people, and a higher prevalence of modern slavery. These include steel, pre-cast concrete, imported materials, electrical equipment, components and wiring which could be manufactured at a site engaging in forced labour or deceptive recruiting, or the raw materials used in components could be mined by children exploited in dangerous environments. These construction materials are used deeper in our supply chain, at Tier 2 and beyond.



#### Promotional items

Promotional items (the majority of which are imported) have been prioritised as research consistently identifies potential and actual instances of forced labour and modern slavery occurring in industries such as textiles, including during the harvesting of raw materials, processing and manufacturing of products. The items or raw materials used in the manufacturing process could be made using state-sanctioned forced labour, or other types of modern slavery deeper within the supply chains.

# Our approach

- **Governance**
- **Due diligence processes**
- **Grievances and remedy**
- **Training and capacity building**

## Governance

As part of our established governance protocol, Transurban Parent Group, Transurban Queensland Group and Airport Motorways Group are overseen by a Board of Directors with direct responsibility for the relevant reporting entities. The Transurban Parent Group Board is also responsible for overseeing Transurban overall, and its governance and risk management approach is publicly reported in our [FY22 Corporate Report](#) (see page 74), as well as in our [Corporate Governance Statement](#).

The Transurban Procurement team is responsible for operational management of the Sustainable Procurement Program which leads the priority of work associated with how Transurban and its owned and controlled entities assess and address the risks of modern slavery. Operationally, the procurement team reports through to the Chief Financial Officer at an executive level, and provides updates through functional reporting channels, to Transurban board committees and Transurban's Executive Committee.

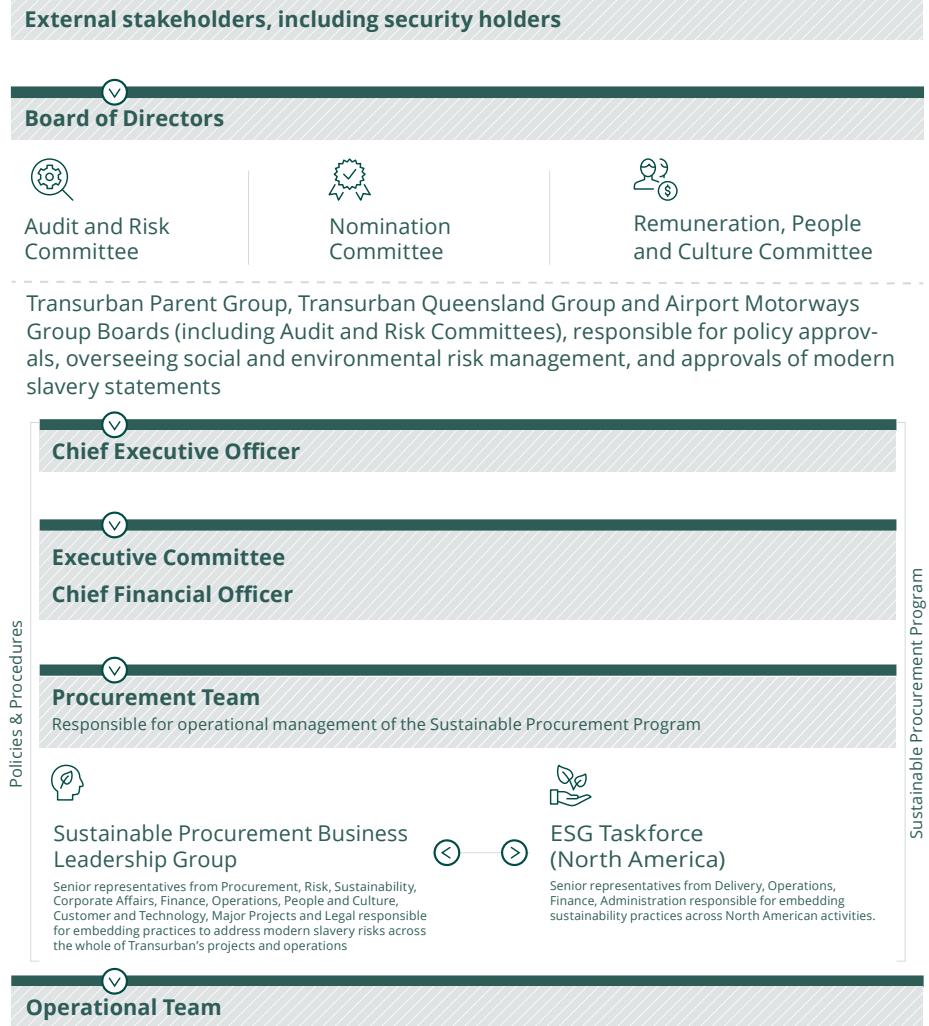
To continuously improve our actions to address modern slavery risks, we draw on internal and external human rights expertise to review our modern slavery statement drafts and the actions that support these statements. From the expert reviews of our previous statements, it was recommended that Transurban could strengthen the internal governance across our group functions. In FY22, we responded to these recommendations to implement a more formalised governance group of business representatives, bringing together a broad range of key personnel across Transurban, to engage in leadership meetings, every second month, on issues including modern slavery risks. This group is tasked with overseeing the agreed roadmap of activities, and implementation of actions across the businesses to assess and address modern slavery risks. This group includes senior members across the business including the Head of Procurement, Sustainable Procurement Manager,

Head of Sustainability, Head of Social Licence, GM of Finance and Business Services, GM of Major Projects, GM of Operations, GM HSE, Head of Belonging Wellbeing and Engagement, Head of Compliance and Privacy, Head of Legal and Senior Vendor Manager – Customer and Technology.

In addition, our business in North America has developed its own ESG Taskforce, which oversees human rights issues specifically in relation to the context of their operating locations.

The Sustainable Procurement Business Leadership Group was formalised in February 2022 and held two meetings in FY22, where the Sustainable Procurement Manager updated members on emerging risks and legislative changes. Members agreed on the roadmap of actions, reviewed and provided input into the integration of the sourcing toolkit and the Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines.

**Figure 5: Modern Slavery Governance**



## Policies and procedures

As noted in our [FY21 Modern Slavery Statement](#) (on page 16), Transurban has a suite of policies that form the foundations of how we manage the risks of modern slavery across our operations and in our supply chain.

Transurban policies and the standards applicable to our employees, contractors and suppliers, are set centrally to create a common baseline for expectations and consistency across the group including all of our owned and controlled entities.

These policies and procedures, including how they support our actions to address modern slavery risks, include:

- **Employee Code of Conduct**—requires employees to follow key principles, including responsibilities on topics including bullying and harassment, equity and diversity, risk management, fraud and sustainability.
- **Sustainability Policy**—Transurban's commitment to People, Planet, Places and Partnerships, including safety of people in our operations and supply chains, and support for the UN SDGs.
- **Supplier Sustainability Code of Practice (SSCoP)**—applies to all new and existing suppliers, outlines our minimum standards and leadership expectations (including labour and human rights), and encourages suppliers to go beyond legal compliance in order to advance their social and environmental responsibility. The SSCoP is required to be communicated to all subcontractors working on Transurban projects.
- **Human Rights Policy**—sets out how Transurban will fulfill our human rights commitments, preventing and addressing adverse human rights impacts. It identifies the salient human rights issues, responses to these issues, including modern slavery, as well as the guidelines for implementation of actions.
- **Whistleblower Policy**—provides information on how Transurban supports the raising of issues (including indicators of potential or actual cases of modern slavery).
- **Diversity and Inclusion Policy**—commits Transurban to a harassment-free environment and promotes pay equality.
- **Ethical Business Practices Policy**—defines the standards required from employees and third parties when working with Transurban and highlights processes for prevention, detection and the investigation of reports of fraudulent or corrupt conduct (including those related to modern slavery). Any material breaches are reported to the Transurban Audit and Risk Committee.

### Employee Policy Handbook (US)

(internal only)—is an additional document provided to employees to support the Code of Conduct in relation to US operations. This policy details information on harassment, misconduct, anti-bribery and corruption, overtime policies, employee entitlements and the whistleblower hotline.

### Procurement Policy (internal only)

commits Transurban to advance alignment with ISO 20400:2017, and to include sustainability considerations in the sourcing process (including human rights). It defines the requirements of employees on the processes to adhere to in relation to procurement activities, including requirements for triage of high-risk categories identified, use of the risk heat map and processes of contracts and purchase orders. It also outlines how breaches to the policy will be dealt with.

### Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines (internal only)

provides information to employees on how to raise an issue relating to actual or potential modern slavery issues in our supply chain and outlines the process for an issue to be triaged, assessed, and what actions may be taken to provide remediation. More information can be found in section 'Grievances and remedy' section on [page 21](#).

Employees, suppliers and Transurban entities are bound by these policies through agreed contractual controls or employment agreements and Transurban monitors these policies with internal systems, management processes and the ability to report issues through our whistleblowing service.

We continue to regularly review and update these policies as required. During the reporting period, the SSCoP, Ethical Business Practices Policy, and Supply Chain Remediation Guidelines were all reviewed. Members of Sustainable Procurement Business Leadership Group provided input to the updates to these policies in relation to human rights and modern slavery.

Further information on Transurban's governance can be found in our [Corporate Governance Statement](#), which details some of the above policies, as well as our ethical conduct and responsible decision making.

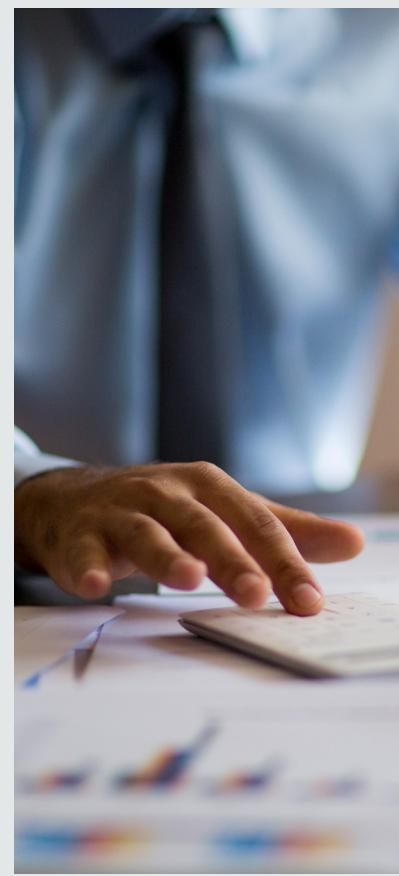
## Supporting small businesses to reduce vulnerabilities

Purchasing practices play a key role in helping to reduce downward pressure on supply chains, which could potentially lead to instances of modern slavery occurring.

Transurban is a signatory to the Australian supplier payment code, led by the Business Council of Australia. This is a voluntary code that asks businesses to pay small suppliers on time and within 30 days of receiving a correct invoice.

Paying small business suppliers on time is critical to easing stress, supporting their ability to expand, keeping healthy cashflows and, potentially, employing more people.

In the reporting period, Transurban spent more than AUD\$71 million (ex GST) with over 664 Australian small businesses,<sup>1</sup> of which we paid 98% of invoices within 30 days<sup>2</sup>. Under the Federal Government's Payment Times Reporting Scheme, Transurban was ranked #1 among the ASX20.



<sup>1</sup> Australian businesses with an annual turnover of less than \$10 million AUD

<sup>2</sup> Percentages were calculated on a simple average basis, at the controlling corporation level. Entities reporting zero small business payments were excluded from the averages

# Supply chain due diligence

As previously described in our FY21 Modern Slavery Statement, our due diligence processes assess and respond to human rights risks including in relation to modern slavery.

Transurban takes a holistic approach in assessing actual or potential modern slavery risks. We do this by tracking how we and our suppliers meet our policies and contractual requirements, integrating these findings, and continuously looking to improve our actions and processes.

Figure 6 is a simplified example of how these processes are integrated into our supply chain management, including some of the key controls, tools and processes used throughout the sourcing lifecycle.

Through this continuous process, we assess how Transurban may cause, contribute or be directly linked to potential or actual instances of modern slavery or adverse human rights impacts using the tools, actions and triage processes that we have available.

We review potential spend against high-risk categories and take actions prior to engaging in a business relationship. During the reporting period, three suppliers were triaged through this internal process and were directed to the Sustainable Procurement Manager for investigation and assessment for approval. We continue to learn from our engagements with suppliers to review and improve these processes over time to mitigate and reduce the risks to people in our extended supply chains.

Transurban has been requested to complete similar due diligence processes for our business partners and customers as part of their supply chains and connected relationships.

## Sourcing toolkit

Sustainable procurement practices are used throughout the lifecycle of our engagement with suppliers. These practices are consistent across each of the Transurban entities that engage with suppliers.<sup>1</sup> Further to the descriptions on page 17 of our FY21 statement relating to our sourcing toolkit, we have detailed additional notes below on how we utilise the tools and how they support our due diligence actions to identify salient risks.

**Supplier screening**—financial, director, and company ultimate beneficial ownership checks are used to identify any known issues that may relate to labour concerns, illegal behaviour or indicators that may lead to adverse human rights impacts, including insolvency risks.

**Sustainable Procurement Risk Heat Map**—available to employees to map the category of goods or service they are looking to purchase against the assessed risk level. This gives employees an opportunity in advance to seek internal advice to incorporate into contracts, or to investigate measures prior to engaging in work.

**Tender Response Schedules**—used during larger procurement activities, usually over a certain threshold in contract value. These schedules, as noted in previous statements, require businesses to answer questions and provide evidence demonstrating the respondent meets our codes and policies, aligns with the UNGPs and core

questions that provide information on how they mitigate the risks to people in their operations and extended supply chains.

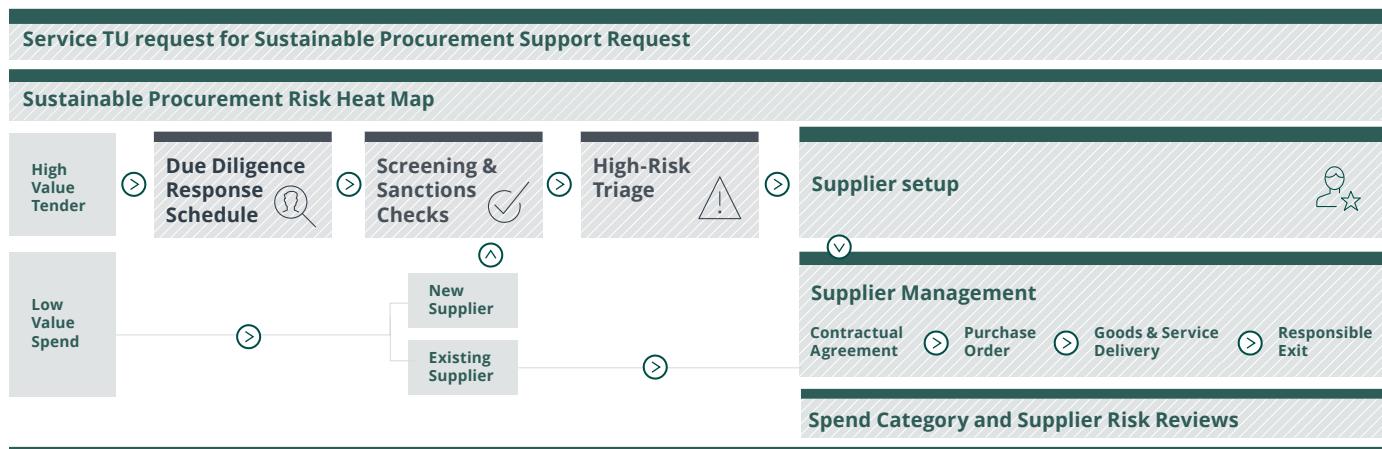
**Contractual controls**—provides binding obligations for suppliers to meet labour related and modern slavery clauses, including reporting potential or actual cases to Transurban, as well as attesting to passing on payments to contractors down the supply chain, helping to reduce the risk of labour related issues beyond Tier 1.

**New supplier high-risk triage**—used when a new supplier is added to the Transurban system to determine if they are providing high-risk goods or services. This request is directly routed to the Sustainable Procurement Manager to investigate any high-risk procurement activity. This action may lead to desktop reviews or engagement with employees or suppliers for further information on the procurement activity and the controls in place. A supplier may not be onboarded if these controls are insufficient.

## Credit card and purchase order reviews

—conducted at intervals throughout the year. Purchase orders and credit card spend for higher risk categories identified in our risk heat map are reviewed. These include spend with suppliers who have existing contracts, Master Services agreements or are on preferred panels. They are investigated in a similar manner to the high-risk triage noted above, through desktop reviews and internal and external engagement. This information is used to improve our assessment of suppliers and categories that we use and will be used to strengthen the requirements of suppliers to mitigate modern slavery risks.

Figure 6: Supplier Modern Slavery Due Diligence Process



## Process Reviews, Audits and Learnings

This table represents a simplified process map of key modern slavery risk triage points, tools and processes involved to identify and monitor risks of modern slavery in our supply chain

Key triage checkpoints which include modern slavery risks      Ongoing monitoring, tools and actions

<sup>1</sup> Transurban's operations in Canada use a separate purchase order and data system. Some of the tools listed may not be used, and others may be different due to the nature of the technology available

<sup>2</sup> Commonwealth Modern Slavery Act 2018 - Guidance for reporting entities

**Supplier evaluation**—this is a new addition to our suite of tools and is in the process of being fully implemented. During the reporting period, this tool was developed internally to capture information from the risk heat map, tender response schedules, publicly available information as well as information provided through our supplier engagement. This tool, will be used to provide an ongoing assessment of suppliers and how they mitigate the risks of modern slavery in their operations and supply chains.

In FY22, we reviewed the questions in our Tender Response Schedules to understand their use, effectiveness and their relevance to all respondent categories. We also reviewed how we were capturing, evaluating, and monitoring these responses.

Through this review process, we updated questions to improve their alignment with core requirements and leading human rights guidance including the minimum requirements and leadership expectations in our SSCoP, other policies, the UNGPs, the expectations of the Act<sup>2</sup>, and other key information that Transurban deemed important to capture to evaluate a supplier and their extended supply chain. These updated Tender Response Schedules will be used in future tenders.

During the reporting period, we piloted a digital risk screening tool to review adverse media, sanctions, watchlists and ownership structures. We reviewed information in relation to 44 of our suppliers across major projects, construction, technology and professional services. There was no information discovered that increased the assessment of risks from our risk heat map.

To better integrate the use of information to assess and manage risks, the supplier evaluation houses information from tender responses and other self-assessment questionnaires, collected and combined with data from supplier consultations, desktop reviews, or other sources. The tool will enable Transurban to monitor and measure suppliers individually and across categories of spend, to highlight areas to improve controls in the supply chain. This evaluation will be used as a continuous monitoring tool to assess the dynamic risks of modern slavery in our supply chains and the due diligence actions taken against these risks.

## Due diligence on security services

In FY22, Transurban initiated a tender for our security services across multiple office locations. While security services are not classified in our highest-risk categories and are not our priority focus, our procurement team noted that security services involve the use of labour-hire and shift-work. Additional advice was sought from the Sustainable Procurement Manager.

A review was conducted of the tender schedules submitted, reviewing policies, processes and detailed information, which highlighted previous labour rights risks relating to Fair Work proceedings disclosed from one respondent. Where these risks are identified, Transurban conducts a deeper level of investigation above and beyond standard procedures.

The information that was sought and received from further engagement enabled a more thorough assessment of labour rights risks and the controls in place, which allowed Transurban to make a more informed decision on a selected supplier. While the supplier, whom openly disclosed information regarding these risks was not successful in the tender, they did provide information which showed a robust system to mitigate against modern slavery risks.

We were encouraged by the transparency of suppliers engaged through these due diligence activities and continue to promote collaboration across our stakeholders to improve how we assess and address modern slavery risks across industries and encourage transparent disclosures and learnings.



## Reviewing historic contract clauses

In FY22, our Sustainable Procurement Business Leadership Group requested a review regarding long-term contract agreements that Transurban had agreed prior to the introduction of the Act. As a result, the Sustainable Procurement Manager reviewed the contract of a major project currently in development.

This review looked at whether the contractual clauses were adequate in the responsibilities of the supplier not to engage in modern slavery like practices.

The review identified that there were various contractual clauses relating to labour rights abuses and criminal codes, which cover all forms of modern slavery, including indicators of modern slavery. In addition, there were requirements for formal governance structures, audit and step-in rights and requirements to report on key aspects of the project, including subcontractors and labour-force make up.

—Case study—

# Piloting human trafficking training “beyond our involvement”



*In a human trafficking context, a driver or passenger travelling on a road which Transurban operates would be considered outside of the boundaries of involvement in modern slavery. But while, in this example Transurban would not be linked in this potential instance of modern slavery, we are taking a broad approach, supporting victims to the extent possible.*

Daily, approximately two million people drive on our motorways in Australia and North America. Transurban has over 5000 CCTV cameras in operation across these tollways and responds to approximately 1000 incidents on our networks every week. This means that Transurban, and our suppliers, may be in a position to identify actual or potential instances of modern slavery.

As noted in our FY21 statement, Transurban in partnership with our incident response supplier Ventia, engaged leading human trafficking experts, Anti-Slavery Australia, to develop and pilot training to our Traffic Control Room Officers (TCRO) and the Incident Response Crews (IRC) on the Eastern Distributor and Cross City Tunnels in Sydney. This training had been deferred due to COVID-19 restrictions but with the easing of social distancing rules in 2022, this in-person training was able to be delivered.

As these critical teams operate on shift rosters to monitor traffic on our roads 24/7, we held two separate training sessions to involve as many team members as possible. The 2.5 hour training was delivered to 40 participants, including TRCO, IRC and Transurban and WestConnex support personnel.

The training content included initial awareness and an overview of what constitutes modern slavery, examples of modern slavery cases in Australia, as well as examples of modern slavery instances on motorways from across the world.

Discussions throughout the training engaged participants and led to further awareness of potential or actual instances of modern slavery and leading indicators.

Participants also discussed innovative ideas on how IRCs could develop a dedicated “code” to escalate issues to TCROs should they be confronted with an incident on our motorways.

*“I had some ideas of the term modern slavery but hadn't had a think around how our industries encounter it. The session made me realise the risk of it”*

*Training participant*

**92%**

of participants indicated that they learned important concepts and ideas

**55%**

of participants indicated their knowledge of the signs of modern slavery increased to very good and excellent

# Grievances and remedy

We recognise the importance of providing access to remediation for affected individuals or groups in line with the UNGPs. Where we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for, or cooperating in, its remediation through legitimate processes. Transurban will seek, where applicable, to exercise to the fullest extent any contractual or other legal rights available to it to address any adverse human rights actions or incidents in which we may be involved, including in relation to any issues concerning modern slavery.

Transurban has internal and external avenues for its employees, contractors and people within our supply chain to raise concerns regarding issues, including those relating to fraud, conflicts of interest, bribery, corruption, potential or actual instances of modern slavery or adverse human rights impacts. As described on page 18 of our [FY21 Modern Slavery Statement](#), our independent external whistleblowing hotline service is available and can be accessed via a toll-free hotline telephone number, online or by post. A report may be made anonymously, if desired, using any of these methods.

During the reporting period, we continued to expand our communications and awareness of this service, including to onsite cleaning contractors, as well as our TCROs and IRCs operating on the Eastern Distributor and Cross City Tunnel as part of specific training focused on identifying human trafficking on our road networks.

Through our independent external whistleblowing hotline service, seven issues were raised during the reporting period. These issues were investigated by our Fraud and Corruptions Control Officer, under our whistleblowing investigation guidelines. Some historic instances of poor labour practices were identified in the subcontracted supply chains beyond Tier 1, however none of these reports related to potential or actual instances of modern slavery.

A less formal channel is also available to raise concerns where an employee can raise an issue via our online "Modern Slavery Query" request, which directs queries to our Sustainable Procurement Manager.

## Remediation guidelines

During FY22, we reviewed and refined our Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines, which outline the appropriate steps we will take if potential or actual instances of modern slavery are identified in our supply chain. We recognise that these issues can be complex and sensitive to navigate, and these guidelines are designed to prioritise the protection and support of identified victims. The guidelines are available on our intranet for all employees and are intended to be improved and developed as we continue to learn about effective remediation.

The changes made in FY22 include further detail in our descriptions of actions and aligning these with our Whistleblowing Policy. Information on escalation, including to the Australian Federal Police and National Contact Points were updated, and the scope was further clarified to include both potential and actual instances of human rights abuses or modern slavery. In addition, further details to the investigation process were added, and examples of remediation were more closely aligned to the continuum of involvement framework encouraged by the UNGPs.

## Training and capacity building

Awareness raising, training and capacity building can better equip our employees and our supplier partners to understand how modern slavery may occur and flourish in our operations or supply chains, and how to identify and respond to modern slavery risks. Each year, all Transurban employees complete mandatory online training across our policies and key issues important to Transurban. These include:

- **Ethical Business Practices**—which includes training on receiving and giving of gifts, including our gift register, training in relation to anti-bribery and corruption, discrimination and modern slavery
- **Code of Conduct**—employees are refreshed on the policy and their obligations, are asked to review the Code of Conduct and attest they have read and understood their obligations
- **Whistleblower policy**—which raises awareness on how to raise concerns internally or externally (including anonymously), including situations of potential or actual instances of modern slavery

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

Modern Slavery online learning includes an introduction from our executive team, a fact sheet for employees to download for quick reference and includes questions throughout the module to test knowledge retention and effectiveness.

## Training deployment approach

These training modules are deployed annually for all eligible employees<sup>1</sup> to complete, accompanied by internal email and news communications, access to the policies on our intranet and public websites, and training modules are available for employees to access on-demand at any time throughout the year to refresh their knowledge.

In addition, during FY22, detailed training workshops on modern slavery, and key requirements under the Act were also held for all procurement employees and several key contract managers as part of our wider program.

Further, the Sustainable Procurement Manager held workshops with key representatives from across our supplier base (and wider industry groups), to build our respective working knowledge and capacity to address modern slavery risks. We believe a key aspect of any successful approach is to work closely with like-minded industry partners to avoid taking a fragmented approach to the market (see 'Multi-Stakeholder Engagement' on [page 24](#)).

<sup>1</sup> Eligible employees, including managed contractors at the time of deployment, with some exclusions including staff in Canada



*Our Sustainable Procurement Manager developed bespoke training for identified groups. This training expanded on foundational concepts and linked to the specific business activities of the groups.*

**—Case study—**

## **Enhancing our internal training and closing knowledge gaps**

By tracking the effectiveness of our modern slavery training and continuously engaging with our business functions we found some areas of the Transurban business where training needed to be tailored to increase awareness and improve skills.

Our Sustainable Procurement Manager developed bespoke training for these identified groups. The training expanded on foundational concepts and linked to the specific business activities of the groups.

Activities included:

- Training for our Vendor Management team, which included refreshing their basic awareness of modern slavery, Transurban's legal obligations to report, examples of inherent modern slavery and human rights abuses in the technology sector, updates on our key policies and procedures to guide and respond to potential or actual instances of modern slavery. The training included detailed review of some of the sourcing tools listed in this statement and how they specifically support Transurban to identify salient risks in sourcing activities.
- Specific training for 15 employees in French-speaking Montreal, Canada. We took this opportunity to build and tailor specific awareness training on modern slavery in a Canadian context. This session was delivered in-person, in French, by one of our sustainability managers working in Quebec over a lunch-and-learn style engagement. The information delivered highlighted human rights and modern slavery issues identified in Canada, it reaffirmed Transurban's commitment to respecting and advancing human rights, including the 'decent work spectrum', and educated employees on goods or services where modern slavery could be linked to our business. It also outlined the requirements in Australia under the Act, and informed participants of the similar emerging legislation in Canada (Bill S-211). Feedback from the session included deep discussions on modern slavery prevalence and learning outcomes from participants of potential risks which they were previously unaware of, identifying key areas of focus for the Canadian team.

# Measuring effectiveness

*Transurban assesses the effectiveness of our actions to address modern slavery and uses feedback to refine our program.*

We seek and receive feedback from both internal and external sources including employees, suppliers, investors, industry groups, external specialist consultants and NGOs. During FY22, we have continued to evolve and mature our processes to measure the impact and effectiveness of our efforts

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

Workstream	Controls or action	Effectiveness Indicators
<b>Governance</b>	Policies and guidelines related to human rights	Key documents reviewed and updated. These documents are managed through an internal control documents library and where required, are endorsed and approved at executive or board level
	External benchmarks	Results in public benchmarks, including Dow Jones Sustainability Index, Global Real Estate Sustainability Benchmark for Infrastructure, MSCI ESG rating, or public reports on modern slavery disclosures
	Internal audit on controls	Internal auditing of processes and controls relating to assessing and addressing modern slavery, and the completion of actions in response to audit findings
	Internal governance groups	Convening of bimonthly Sustainable Procurement Business Leadership Group meetings (two completed in FY22). Completion of action items originating from meetings. Qualitative feedback from these leadership meetings on improvements in actions and their effectiveness
	Sustainable Procurement Program KPIs	Meeting annual key performance indicators in relation to continuous improvement in assessing and addressing modern slavery risks in Transurban's operations and supply chains
	Integration of modern slavery considerations into sourcing practices managed directly by the Procurement team	Mandatory supplier self-assessment questions including in relation to human rights including modern slavery used in all sourcing activity managed directly by the procurement team per annum
<b>Risk Management</b>	Risk assessment	Annual review of Sustainable Procurement Risk Heat Map, which includes modern slavery risk assessment methodology
	Risk register tracking	Actions taken against corporate risk register items regarding modern slavery
<b>Monitoring</b>	Issues raised through our grievance mechanisms	Accessibility and utilisation of mechanisms Number of issues investigated and remediated
	Employee Our Voice survey. We conduct an annual employee opinion survey to gather feedback around confidence in leadership, our customer focus, commitment to diversity and inclusion, and more.	"Our Voice" survey results
	Supplier and Business Partners survey for feedback on our actions which may impact suppliers and increase the risks of modern slavery occurring	Qualitative feedback to identify areas of focus where Transurban can enhance actions.

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

# Multi-stakeholder engagement

**Transurban continues to contribute to industry progress in tackling modern slavery, including engaging on policy, collaborating on activities<sup>1</sup> and promoting awareness.**



During FY22, Transurban representatives regularly participated in industry initiatives to share knowledge and learn from each other. We also undertook joint initiatives with industry groups to drive stronger and more coordinated outcomes across the community.

Key activities progressed during FY22 included:

- Australian Government's Modern Slavery Expert Advisory Group, which from 2022 is now led by the Attorney-General's Department
  - Our Sustainable Procurement Manager has been a member of this advisory group since 2020
- UN Global Compact Network Australia (UNGCNA)
  - Transurban is a member of the UNGCNA and an active participant in the Modern Slavery Community of Practice – Optimising Stream, where businesses committed to the 10 principles, deepen their knowledge across human rights and modern slavery, engage with experts, share insights and increase supportive networks on remediation
- Transurban participated (in-person and online) in numerous multi-stakeholder sessions to discuss human rights issues, including modern slavery (the Domus 8.7 Index - benchmark of modern slavery statements webinar, and the International Justice Mission modern slavery roundtable

'Spot Fires in Supply Chains' discussion on the publication)

- Panel member at the RIAA Australia 2022 Conference - Human Rights Working Group discussion on Australia's modern slavery legislation and actions.
- Partnered with Anti-Slavery Australia to help develop and implement a pilot program to educate our TCROs and IRCs on identification and escalation of human trafficking – see [page 20](#)
- Engaged with like-minded industry members through the ISC Modern Slavery Coalition to collaborate and increase capabilities across the infrastructure construction and maintenance sector, including participating at a panel discussion session at the ISC Re:Connect Conference in Sydney in March 2022 titled 'Mitigating modern slavery risks'
- Shared key insights and experiences on assessing and addressing Modern Slavery risks through a podcast interview, hosted by Apricot Consulting
- Joined the online panel discussion for the ACSI presentation of "Moving from paper to practice" report, delivered to ASX200 companies in December 2021

We continue to engage with industry to collectively act, share our knowledge where we can help others, and learn from peers and experts.

## Collaborating for action

During FY22, the Infrastructure Sustainability Council's—Modern Slavery Coalition continued to focus on practical opportunities for collaborative action to address shared modern slavery risks in the infrastructure sector. The Coalition met regularly during this period and progressed a number of key actions. This included:

- **Draft supplier risk tool**—In early FY22, the Coalition prepared a template supplier risk tool, which aims to provide small suppliers with a practical tool for assessing modern slavery risks in their operations and supply chains and communicate with Coalition members. The tool includes guidance on geographic, sector and product risk factors. The Coalition is working to trial the tool with suppliers.
- **Supplier capacity building workshop**—In November 2021, the Coalition held an online modern slavery workshop for infrastructure sector suppliers to improve their understanding and communication of modern slavery risks. The workshop was attended by 42 participants from across the sector and included an overview of the draft supplier risk tool.
- **Delivered modern slavery webinar for infrastructure sector suppliers**—In September 2021, the Coalition hosted an online webinar for infrastructure sector suppliers to help build understanding of modern slavery risks across the sector
- **Awareness raising**—The Coalition sponsored a panel discussion at the March 2022 ISC Reconnect Conference about modern slavery. Panel members discussed key challenges to addressing modern slavery both internally within their organisations and the supply chain more broadly and opportunities for greater action.

*'Collaboration is a key foundation for meaningful business action to prevent and address modern slavery. Through the Coalition, business peers are exploring opportunities for action in the infrastructure sector, through supplier engagement, capacity building and engagement with expert external, stakeholders.'*

*Alexander Coward, Senior Advisor  
Pillar Two, Independent Co-chair, IS Council  
Modern Slavery Coalition*

<sup>1</sup> All external engagement initiatives are conducted in accordance with applicable laws, including the Competition and Consumer Act 2010 (Cth)

# Approval

## Consultation

Transurban Group operates with overarching policies, systems and approaches that are designed to be consistently applied across each of the entities comprising Transurban. The entities comprising Transurban also have a common Procurement team. In preparing this Modern Slavery Statement, Transurban has communicated with relevant entities across the group to frame expectations, increase awareness, inform our disclosure in this statement and strengthen our approach to addressing modern slavery risks. This has included seeking input from our ongoing Sustainable Procurement Business Leadership Group for modern slavery risk management, which include representatives from across a broad range of functions who have responsibilities across the reporting entities covered by this statement and their owned and controlled entities (including Major Projects, Operations, Sustainability, Social Licence, Finance, People and Culture, HSE, Procurement, Risk and Legal).

During FY22, the Procurement team also presented to the Boards of Transurban, Transurban Queensland Group and Airport Motorway Group on the status of relevant procurement practices and the preparation of this statement under the Act. This Modern Slavery Statement has also been reviewed by the Executive Committee of Transurban, and executive representatives from the Transurban Queensland Group and Airport Motorway Group, prior to being put to the relevant group boards for review and final approval.

This joint Modern Slavery Statement was approved by the following Boards of Directors (as the 'higher entity' for the reporting entities within each business group within the meaning of the Act):

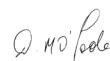
- The Board of Transurban Group<sup>1</sup> for the Transurban Parent Group on 20 October, 2022;
- The Board of Transurban Queensland<sup>2</sup> for the Transurban Queensland Group on 2 December 2022; and
- The Board of Airport Motorway Pty Limited for the Airport Motorway Group on 23 November, 2022.



**Craig Drummond**  
*Chairman, Transurban Group*



**Scott Charlton**  
*Chief Executive Officer, Transurban Group*  
As a representatives of the Transurban Parent Group



**Deborah O'Toole**  
*Chairman, Transurban Queensland*  
As a representative of the Transurban Queensland Group



**Raymond Golzar**  
*Chairman, Airport Motorway Limited*  
As a representative of Airport Motorway Group

<sup>1</sup> The "Board of Transurban Group" means each of the Boards of Transurban Holdings Limited, Transurban International Limited and Transurban Infrastructure Management Limited as the responsible entity of Transurban Holding Trust

<sup>2</sup> The "Board of Transurban Queensland" means each of the Boards of Transurban Queensland Holdings 1 Pty Ltd and Transurban Queensland Holdings 2 Pty Ltd. Transurban Queensland Holdings 2 Pty Ltd is not a reporting entity for the purposes of this statement

# Appendix A

## Reporting entities

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

- Transurban Holdings Limited ACN 098 143 429 ('THL')
- Transurban International Limited ACN 121 746 825 ('TIL')<sup>1</sup>
- CityLink Melbourne Limited ACN 070 810 678
- Interlink Roads Pty Limited ACN 003 845 430
- M5 Holdings Pty Limited ACN 073 922 620
- Sydney Roads Limited ACN 119 323 901
- The Hills Motorway Limited ACN 062 329 828
- Transurban Sun Holdings Pty Limited ACN 169 039 776
- Transurban WGT Co Pty Ltd ACN 617 420 023

(together, referred to as the 'Transurban Parent Group')

- Transurban Queensland Holdings 1 Pty Ltd ACN 169 090 804
- APL Co Pty Limited ACN 609 262 615
- APL Hold Co Pty Limited ACN 609 262 624
- Gateway Motorway Pty Limited ACN 010 127 303

- Logan Motorways Pty Limited ACN 010 704 300
  - QML Hold Co Pty Limited ACN 165 802 004
  - Queensland Motorway Holdings Pty Limited ACN 150 265 197
  - Queensland Motorways Pty Limited ACN 067 242 513
- (together, referred to as the 'Transurban Queensland Group')
- Airport Motorway Holdings Pty Limited ACN 078 322 531
  - Airport Motorway Pty Limited ACN 057 283 093,
- (together, referred to as the 'Airport Motorway Group').

Further details on Transurban roads and projects managed by the reporting entities outlined above are covered in the [FY22 Corporate Report](#), which can be located at [transurban.com](#)

<sup>1</sup> Voluntary reporting entity

# Appendix B

Mandatory reporting criteria	Reference in this statement
Identify the reporting entity	<ul style="list-style-type: none"><li>• Contents—see <a href="#">page 3</a></li><li>• Appendix A—see <a href="#">page 26</a></li></ul>
Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"><li>• Our structure and operations—see <a href="#">page 6</a></li><li>• Our supply chain—see <a href="#">page 12</a></li></ul>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	<ul style="list-style-type: none"><li>• Modern slavery risks—see <a href="#">page 14</a></li></ul>
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	<ul style="list-style-type: none"><li>• Our approach—see <a href="#">page 16</a></li><li>• Multi-stakeholder engagement—see <a href="#">page 24</a></li><li>• Measuring effectiveness—see <a href="#">page 23</a></li></ul>
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	<ul style="list-style-type: none"><li>• Measuring effectiveness—see <a href="#">page 23</a></li></ul>
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	<ul style="list-style-type: none"><li>• Consultation—see <a href="#">page 25</a></li><li>• Approval—see <a href="#">page 25</a></li></ul>
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"><li>• Our broader sustainability efforts—see <a href="#">page 3</a></li><li>• Multi-stakeholder engagement—see <a href="#">page 24</a></li></ul>

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