

Anti-Bribery, Corruption and Fraud Policy

Application of this Policy

This Anti-Bribery, Corruption and Fraud Policy (Policy) outlines Transurban's approach in relation to the prevention, detection, deterrence and management of Bribery, Corruption and Fraud risks as they pertain to the Transurban Group.

Capitalised terms not otherwise defined in this Policy take their meaning from the Anti-Bribery, Corruption and Fraud Management Procedure (Procedure).

This Policy applies to:

- all directors, officers, group executives and employees of Transurban (whether permanent or temporary);
- contractors of Transurban; and
- consultants or suppliers of goods or services to Transurban (including relevant employees or contractors of such consultants or suppliers).

(collectively, Personnel or Transurban Personnel).

For the purposes of this Policy, references to Transurban or Transurban Group mean Transurban Holdings Limited, Transurban International Limited, Transurban Holding Trust, and their controlled entities.

Overview

Transurban is committed to developing and embedding a culture of acting lawfully, ethically and responsibly (as outlined in our Code of Conduct, and as reinforced by this Policy and the Procedure).

Transurban has zero tolerance for any wilful breaches of this Policy. In particular, Transurban Personnel must not engage in any form of Bribery, Corruption or Fraud, including the making of any form of facilitation payment.

Anti-Bribery, Corruption and Fraud Management

All Transurban Personnel should be aware of, and understand, their obligations and requirements in relation to the reporting and management of Bribery, Corruption and Fraud arising in the course of their employment or contractual engagement with Transurban. Bribery, Corruption or Fraud by (or involving) Personnel may result in serious criminal and/or civil penalties, as well as damage to Transurban's reputation. They may also impact our relationships with our stakeholders, including our customers and the communities in which we operate.

Transurban's program to prevent, detect and deter Bribery, Corruption and Fraud is informed by, and tailored to, Transurban's risk profile and appetite. Key elements of the program include:

- a commitment by Transurban management to a culture of zero tolerance in relation to Bribery, Corruption or Fraud by (or involving) Personnel;
- conducting ongoing, Bribery, Corruption and Fraud risk assessments;
- maintaining and compliance with the required policies and procedures;
- appropriate third party due diligence;
- internal and independent reporting frameworks which support the raising of concerns and outline the protections available to Personnel;
- regular communication and training of Personnel; and
- a commitment to continuous improvement and monitoring and reviewing of Transurban's Anti-Bribery, Corruption and Fraud program.

Compliance with this Policy

Details on how to comply with this Policy can be found in the Procedure. If Personnel identify or suspect any instance of Bribery, Corruption or Fraud, (including any potential instance of modern slavery), it is their responsibility to immediately report it to their people leader, the Fraud, Corruption and Control Officer or to refer the matter to the Fair Call Whistleblower Service.

Consequences of non-compliance with this Policy

Failure to comply with the obligations and requirements of the Policy may lead to disciplinary action being taken by Transurban in accordance with the Code of Conduct. In certain circumstances such action may include the termination of an individual's employment with Transurban.

Material breaches of this Policy will be reported to either the Transurban Board or the Board Audit and Risk Committee (as applicable). This Policy will be reviewed on a periodic basis.

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