

Political Contributions Policy (U.S.)

Purpose

This document sets out the policy of Transurban USA Inc. (TUSA) in relation to payments to political parties and individuals holding or standing for elected office (political contributions).

Risks to TUSA associated with political contributions potentially arise as a result of:

- Breach of Federal or State electoral laws (including exceeding caps or failing to meet disclosure obligations).
- Breach of Federal or State bribery or corruption laws.
- Contributions made during sensitive periods (potentially, even where TUSA has complied with applicable laws), with associated reputational issues.

Policy

TUSA's policy regarding political contributions is as follows:

- TUSA participates in public policy debate on issues that may impact its business. Consequently, payment for attendance at political fundraising functions is permitted under certain circumstances; and
- TUSA employees can elect to support candidates as a personal, individual decision and not on behalf of TUSA. Under US law, TUSA is prohibited from reimbursing (directly or indirectly) any personal contributions made by individual employees.

Legal Requirements

Transurban Legal will seek appropriate external advice on the legality of payments in any new jurisdiction before any payments for attendance at fundraising events are considered in that jurisdiction.

Transurban Legal will annually, or earlier if there is a change in law regarding political contributions, update this policy and advice for all jurisdictions in which TUSA operates and brief the Executive Committee as required. This advice will include information on any legal controls and reporting requirements on payments in each jurisdiction other than Australia (which is covered by the relevant policy for that region).

Variations to Policy

Any material amendments to this policy must be approved by the Transurban Group Board.