

Modern Slavery Statement 2024





CEO message



Michelle Jablko
Chief Executive Officer

Modern slavery is a pervasive issue right around the world, including in Australia. The prevalence of modern slavery means no country, industry or business is immune.

Tackling modern slavery effectively means recognising this reality and acting with vigilance in working to change it. This 2024 Modern Slavery Statement details the actions we have taken during the 2024 financial year (FY24) to mitigate modern slavery risks in our operations and supply chains, and to educate our workforce and suppliers on detecting and acting on potential signs of modern slavery.

Transurban procures a wide range of goods and services – including in the delivery of multi-billion-dollar construction projects that employ thousands of people and rely on vast quantities of materials. Further, our roads in Australia and North America are used by around 10.8 million customers a year.

All this means we have many opportunities to engage with industry, suppliers and the community on the issue of modern slavery – with the twin goals of detecting and preventing it.

Transurban has not, to date, identified any instances of modern slavery in our operations or supply chains. We acknowledge this doesn't mean modern slavery was not present and we remain vigilant in working to both reduce risks and improve our ability to detect potential instances of slavery across our business.

To this end, this year we have continued our efforts in:

- educating suppliers on assessing and tracking potential supply-chain risks
- providing targeted and tailored training to key workers and contractors
- sharing information and knowledge across our industry
- maintaining and enhancing our governance and risk processes and procedures
- empowering our people with information, support and multiple reporting avenues.

This Statement details how we've delivered on all the above.

Michelle Jablko
Chief Executive Officer



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Modern Slavery Statement (this report)

Overview of how we identify, manage and mitigate the specific risks of modern slavery in our operations and supply chains.

FY24 Corporate Report

Transurban's holistic performance for FY24, including our Financial Statements.

FY24 Results Presentation

Management presentation of financial and non-financial results, including non-statutory analysis.

FY24 Sustainability Data Pack

Data sets for sustainability metrics, including the Global Reporting Initiative, Sustainability Accounting Standards Board, Taskforce on Climate-related Financial Disclosures Index, and our progress against the United Nations Sustainable Development Goals.

GHG Basis of Preparation

Description of the key boundaries, methodologies, and references used in the preparation of Transurban's reported greenhouse gas (GHG) emissions and associated climate change disclosures.

Corporate Governance Statement

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

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Overview of our corporate structure, approach to tax and tax position for FY23.

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Acknowledgment of Country

Transurban acknowledges the Traditional Owners of the lands throughout Australia, and we pay respect to Elders past and present. We acknowledge our roads and infrastructure are built on Country. With deep respect, we incorporate the voice of First Nations people in our approach, supporting equitable access to mobility across communities.



All available on our website
transurban.com

Reporting Entities under the Modern Slavery Act 2018 (Cth) – This Modern Slavery Statement (Statement) is published in accordance with the Modern Slavery Act 2018 (Cth) (Act). As was the case in the previous reporting periods, this is a joint statement by each of the Reporting Entities under the Act as listed in Appendix A ("Reporting Entities").

For the purposes of this Statement, unless otherwise indicated, 'Transurban', 'we', 'us' or 'our' refers to the Reporting Entities.

The WestConnex Group, Sydney Transport Partners (STP) 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 (Program) has been deployed across the WestConnex Group (owned and controlled by STP) 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.

Unless explicitly identified otherwise in this Statement, Transurban operates using group-wide policies and procedures to assess and address modern slavery risk.

Risk definition – Unless stated otherwise, all references to 'risks' within this Statement refer to modern slavery risks to people. For more information on Transurban's corporate and sustainability risks and responses see our [FY24 Corporate Report](#).



FY24 in review

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

This is our fifth Modern Slavery Statement, published in accordance with the Modern Slavery Act 2018 (Cth). While we did not detect or receive alerts about any actual or suspected modern slavery instances in our operations or supply chains over the reporting period, we recognise this does not mean that modern slavery was not present.

This Statement details actions we've taken to improve our ability, where possible, to mitigate modern slavery risks in our operations and supply chains during FY24, and acknowledges that our work in this regard is ongoing.

We also acknowledge that our roads are used by customers who may be engaging in, or victims of, modern slavery activities. While we may not cause or contribute to these activities, we continue working to better identify potential instances of modern slavery on our roads and to improve the awareness and capabilities of teams monitoring our roads.

Our overall approach to mitigating modern slavery risks during FY24 encompassed:

- **Conducting ongoing due diligence** For example, introducing new risk-based rules into our supplier onboarding processes to identify, assess and respond to modern slavery risks earlier in the procurement process
- **Strengthening our policies and procedures** For example, elevating our existing Contract Management Framework into a policy that guides and governs our operations; and strengthening our [Supplier Sustainability Code of Practice](#) and [Human Rights Policy](#)
- **Building skills and awareness across our business, supply chains and industry** For example, sharing our lessons learned at industry conferences and delivering tailored training to suppliers

- **Monitoring and measuring our actions and effectiveness** For example, through external assessments such as RMIT University's [Sustainable Procurement Disclosure Index](#) and the Monash Centre for Financial Studies' [Modern Slavery Disclosure Quality report](#).

FY24 key actions

Key actions for this reporting period included:

- updating our [Human Rights Policy](#) and [Supplier Sustainability Code of Practice](#), and supporting our Canadian joint-venture partner to uplift their similar Supplier Sustainability Code of Practice
- extending our supplier evaluations to more than 200 suppliers, covering more than 80% of total Transurban spend, including prioritising high-risk industry supplier assessments against Transurban-developed modern slavery response criteria
- strengthening our supplier onboarding processes by conducting digitised labour rights and modern slavery triage actions earlier in our supplier-engagement process
- increasing our direct construction-material supplier engagement, including initiating an analysis of our steel supply chain's traceability
- delivering tailored and interactive training to suppliers and targeted teams, including in the US
- collaborating with suppliers, via industry events, to increase awareness of modern slavery risks and potential indicators
- supporting a non-controlled joint-venture entity in engaging with its principal contractor on the development and implementation of a project specific modern slavery risk management and action plan within the construction contract.

FY18–FY21

- Transurban Sustainable Procurement Program established, aligned to ISO 20400:2017.
- 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.
- Established a dedicated sustainable procurement leadership role.
- Conducted modern slavery awareness training and workshops for our people and key suppliers.
- Published our inaugural Modern Slavery Statement (FY20).

FY22

- Reviewed and strengthened tools and processes used to assess and address modern slavery risks.
- Piloted first responder training to identify and escalate potential or actual instances of modern slavery.

FY23

- Embedded the use of our purpose-designed in-house supplier evaluation tool.
- Piloted a bitumen supply-chain study to deepen our understanding of modern slavery risks.
- Continued to expand training and build capacity in our operations and our supply chains.

FY24

- Updated key policies and codes of practice to strengthen our approach to identifying and managing modern slavery risks.
- Fast-tracked our supplier engagement on modern slavery by bringing digital labour rights and modern slavery triage actions forward in the onboarding process
- Delivered tailored modern slavery training to our traffic control room operators and incident response crews (US) and our newly appointed incident response contractor (Queensland).

0 instances of modern slavery detected in our operations or supply chains.
Detection challenges and risks remain and we continue working to mitigate both.

More than 99% of direct spend was with direct Tier 1 suppliers¹ located in the countries where we operate – Australia, Canada and the United States.

5 training sessions delivered to suppliers and targeted teams, including in the US.
Tailored training sessions included interactive components and real-world examples.

More than 200 suppliers evaluated² on their modern slavery efforts using a purpose-designed in-house evaluation tool.
Evaluations included 80 priority or high-risk industry suppliers.

¹ A Tier 1 supplier is a supplier directly contracted by Transurban
² Evaluated over the past 24 months



About Transurban

As one of the world's leading toll-road developers and operators, our business is to get people where they want to go, as quickly and safely as possible. Our employees, based in both Australia and North America, work in partnership 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.

Sustainability focus and reporting

Sustainability is a driver of our business strategy, planning, operations and supply chain management activities – and we regularly review our environmental, social and governance approaches to ensure they appropriately reflect what matters most to our stakeholders. We also work to make meaningful contributions to the United Nations' Sustainable Development Goals

(UN SDGs). Assessing and addressing both 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 (Figure 1), and we report annually on how we are contributing to these global goals.

See our [FY24 Corporate Report](#) for more information on our sustainability approach, activities and performance.

Figure 1: UN SDGs relevant to Transurban



22
assets in operation

3
major projects expected to open by 2026

2.5M
trips (on average) daily across our roads

10.8M
customers globally

1996
listed on the Australian Stock Exchange

No. 1
global and Australian company on gender equality performance (Equileap 2024 ranking)

+360km
roads, tunnels, bridges and ramps

Our values

Transurban's values set the agenda for the way we work and how we interact with all our stakeholders.



Integrity



Collaboration



Accountability



Ingenuity



Respect

Together these values set the foundation for our work on modern slavery risk management and, more broadly, our respect for human rights. Our purpose – to strengthen communities through transport – also informs our human rights approach, and our approach to communities generally. We continually challenge ourselves in how we respond to social issues and to create social inclusion.



Our structure and operations

Figure 2: Structure and operations overview (as at 30 June 2024)

| | | |
|--|--------------------------|--|
| Montreal, Canada One office site | | |
| ● A25 | 50% 50% | Transurban CDPQ |
| Greater Washington Area, United States Two office sites | | |
| ● 495 Express Lanes | 50% 25% 15% 10% | Transurban AustralianSuper CPP Investments UniSuper |
| ● 95 Express Lanes | 50% 25% 15% 10% | Transurban AustralianSuper CPP Investments UniSuper |
| ● 395 Express Lanes | 50% 25% 15% 10% | Transurban AustralianSuper CPP Investments UniSuper |
| 🚧 Fredericksburg Extension | 50% 25% 15% 10% | Transurban AustralianSuper CPP Investments UniSuper |
| 🚧 495 Express Lanes Northern Extension Project | 50% 25% 15% 10% | Transurban AustralianSuper CPP Investments UniSuper |
| 🚧 95 Express Lanes/Opitz Boulevard Ramp Project | 50% 25% 15% 10% | Transurban AustralianSuper CPP Investments UniSuper |



- Road - asset
- Road - operations
- 🚧 Project
- 📍 Click for detailed maps and information



Brisbane, Australia Three office sites

| | | |
|--|-----------------------|---|
| ● Gateway Motorway | 62.5% 25% 12.5% | Transurban AustralianSuper Platinum Tawreed Investments |
| ● Logan Motorway | 62.5% 25% 12.5% | Transurban AustralianSuper Platinum Tawreed Investments |
| ● Clem7 | 62.5% 25% 12.5% | Transurban AustralianSuper Platinum Tawreed Investments |
| ● Go Between Bridge | 62.5% 25% 12.5% | Transurban AustralianSuper Platinum Tawreed Investments |
| ● Legacy Way | 62.5% 25% 12.5% | Transurban AustralianSuper Platinum Tawreed Investments |
| ● AirportlinkM7 | 62.5% 25% 12.5% | Transurban AustralianSuper Platinum Tawreed Investments |
| 🚧 Logan West Upgrade Project <i>(announced July 2024, under development)</i> | 62.5% 25% 12.5% | Transurban AustralianSuper Platinum Tawreed Investments |
| ● Inner City Bypass <i>Transurban manages operations, maintenance and incident response</i> | 100% | Brisbane City Council |
| ● Toowoomba Bypass, South East Queensland <i>Transurban provides tolling services</i> | 100% | Department of Transport and Main Roads |

Melbourne, Australia Six office sites

| | | |
|----------------------------|------|------------|
| ● CityLink | 100% | Transurban |
| 🚧 West Gate Tunnel Project | 100% | Transurban |

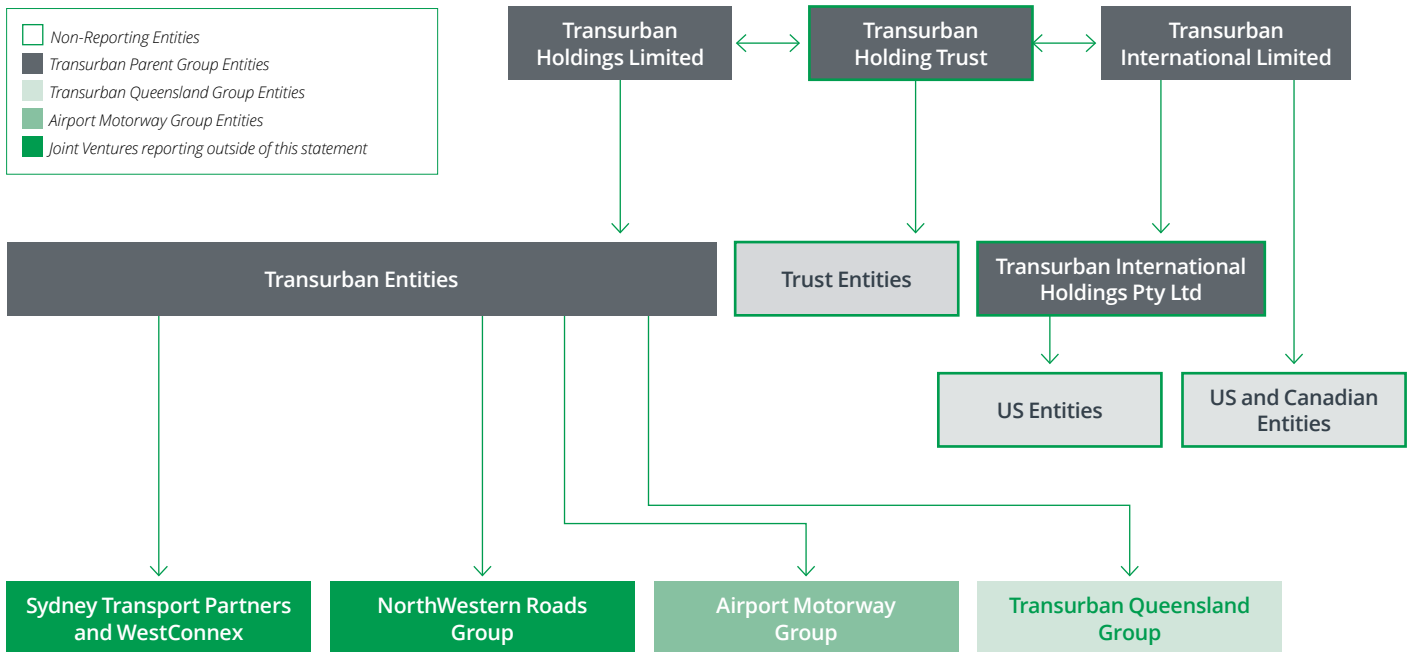
Sydney, Australia 12 office sites and one depot

| | | |
|------------------------------|------------------------------------|--|
| ● M5 West | 100% | Transurban |
| ● M2 | 100% | Transurban |
| ● Lane Cove Tunnel | 100% | Transurban |
| ● Cross City Tunnel | 100% | Transurban |
| ● Eastern Distributor | 75.1% 14.37% 10.53% | Transurban IFM Investors UniSuper |
| ● M7 | 50% 25% 25% | Transurban CPP Investments QIC Limited |
| ● M8 | 50% 20.5% 10.5% 10% 9% | Transurban AustralianSuper CPP Investments CDPQ Platinum Tawreed Investments |
| ● M4 | 50% 20.5% 10.5% 10% 9% | Transurban AustralianSuper CPP Investments CDPQ Platinum Tawreed Investments |
| ● M5 East | 50% 20.5% 10.5% 10% 9% | Transurban AustralianSuper CPP Investments CDPQ Platinum Tawreed Investments |
| ● M4-M8 | 50% 20.5% 10.5% 10% 9% | Transurban AustralianSuper CPP Investments CDPQ Platinum Tawreed Investments |
| ● Rozelle Interchange | 50% 20.5% 10.5% 10% 9% | Transurban AustralianSuper CPP Investments CDPQ Platinum Tawreed Investments |
| ● NorthConnex | 50% 25% 25% | Transurban CPP Investments QIC Limited |
| 🚧 M7-M12 Integration Project | 50% 25% 25% | Transurban CPP Investments QIC Limited |

AUSTRALIA

- Brisbane
- Sydney
- Melbourne

Figure 3: Corporate structure (Transurban summary)



Our corporate structure

At the parent level, Transurban operates under a triple-stapled structure. Each stapled security – comprising a share in Transurban Holdings Limited (THL), a share in Transurban International Limited (TIL), and a unit in Transurban Holding Trust (THT) – is quoted and traded as a single security on the ASX.

Each of these entities is overseen by its respective board of directors: the THL board, the TIL board and, in respect of THT, the board of Transurban Infrastructure Management Limited (TIML) as the responsible entity of THT. These boards have common directors and meet concurrently. Unless otherwise indicated, in this Statement, the three boards are collectively referred to as the Board.

Controlled entities within the Transurban group include corporate entities domiciled and incorporated in Australia, the United States and Canada. For the purposes of reporting under the Act, in FY24, Transurban had 21 Reporting Entities (see Appendix A).

Statement coverage

This Statement covers the Reporting Entities in Appendix A. For the purposes of this Statement, the Reporting Entities have been separated into the three corporate groups, namely, the Transurban Parent Group, Transurban Queensland Group, and Airport Motorway Group (each as defined in Appendix A and as follows).

• Transurban Parent Group

For the purposes of this Statement, ‘Transurban Parent Group’ refers to the stapled entities THL, TIL, TIML as the responsible entity of THT, and the subsidiaries identified as Transurban Parent Group members in Appendix A. Transurban Parent Group, under the entity TIL, also owns and controls entities in the United States and Canada.

• 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 Platinum Tawreed Investments, a wholly owned subsidiary of the Abu Dhabi Investment Authority (12.5%).

• 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%).

Joint ventures

As shown in our structure and operations overview (Figure 2) and our corporate structure (Figure 3), Transurban holds non-controlling equity investments in non-operated joint ventures in Australia,

Canada and the United States. In some cases, Transurban acts as the operator of road assets under contract to these entities. Where Transurban operates road assets, information is included within this Statement unless otherwise noted.

External lending activities

Transurban does not lend money to third parties. We do, however, have minority investments in non-core road operating assets.

More information

For more information on the Reporting Entities held by Transurban Parent Group, Transurban Queensland Group and Airport Motorway Group, see Appendix A.

For more information on our operations, executive team and assets, see our [FY24 Corporate Report](#).

Our operations

Our operations¹ broadly involve working in partnership with governments, business partners, suppliers and other stakeholders to build and operate toll roads that benefit our customers and neighbouring communities. Our toll roads serve as key transport connections for people and freight in major cities and regions in Australia, the United States and Canada.

A typical toll-road lifecycle is shown in Figure 4. As well as building new roads, we also acquire existing roads. We manage

¹ In this Statement, ‘operations’ refers to actions undertaken by our direct workforce including employees and managed contingent workers. Suppliers and people engaged to provide support services that may interact with our operational teams (such as cleaning contractors) are included and referenced in our supply chain (page 11).



the operations and maintenance of our roads, including managing major upgrades, over the specified concession periods. The average concession period across our assets is 28.3 years. When a specified concession period ends, assets are handed back to the relevant government.

We currently operate more than 360 kilometres of road infrastructure, including open roads, tunnels, bridges and ramps. In FY24 we assumed operations of a new asset, the Rozelle Interchange (Sydney) part of the WestConnex network. The interchange was delivered by the NSW Government and opened to traffic in November 2023. As the operator of WestConnex, we became responsible for this new interchange's operations from its opening date.

Beyond the road infrastructure we build, operate and maintain, we also deliver parks, cycling and pedestrian paths, playgrounds and public art.

We collaborate with our contractors and subcontractors to develop our projects in line with applicable government regulatory, technical and social procurement requirements. Once a newly built or upgraded road is commissioned into service, we operate the road using state-of-the-art technology designed to support safe and efficient traffic flows.

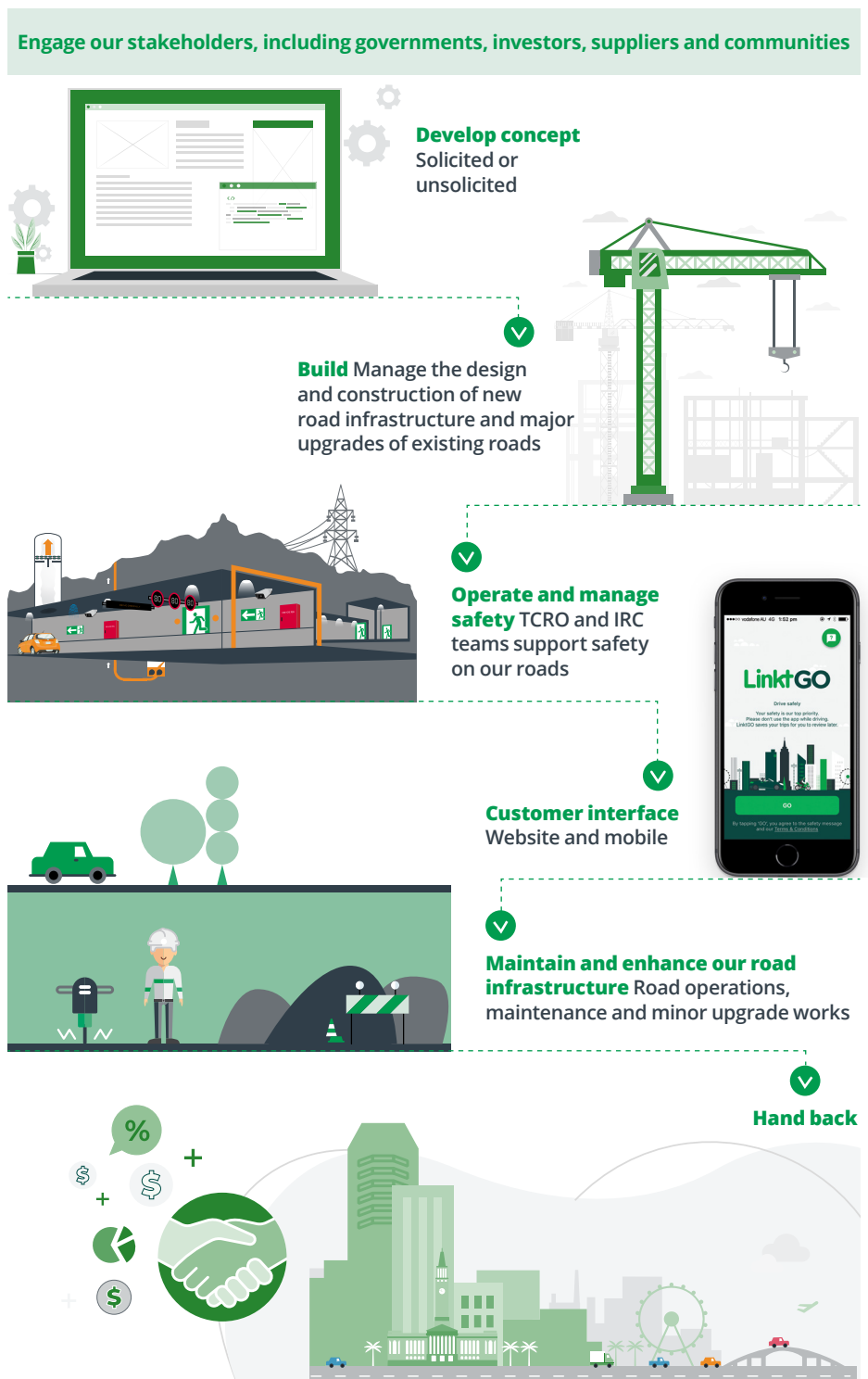
Road operations are monitored 24/7 via our hi-tech traffic control room centres, where our highly trained traffic control room operators (TCRO) are supported by on-road technology such as CCTV, road sensors and AI-enabled alert systems. Incident Response Crews (IRC) also operate 24/7, ready to respond to incidents within minutes and helping maintain safe and efficient operations while also supporting impacted customers.

For information on our operational governance, policies and processes, see Our approach, page 17.

Customer experiences

Our customers largely manage their toll accounts online or via mobile apps, where they can access information on toll pricing, trip costs and tolling points. Our Trip Compare tool, available for travel in Sydney and Melbourne, enables customers to compare time savings on tolled and untolled routes, and see their potential fuel and Co2 emission savings. Our customers interact with us and manage their toll payments via our retail brands (Figure 5).

Figure 4: Toll-road lifecycle overview



Transurban may also acquire concessions of existing road assets, or be engaged by governments to operate their owned assets under contract

Figure 5: Our retail brands





Our people

Transurban's direct workforce¹ comprises more than 4,100 people across Australia and North America. Our people work flexibly, including from our 25 corporate offices and site locations.³ Job functions include: toll road operations and maintenance; major road project delivery; customer service; and head office functions (such as customer and technology; facilities; finance; health, safety and environment; legal; people and culture; procurement; risk; and sustainability).

Employment standards

Our workforce predominately comprises highly skilled workers. In Australia, our employees are covered by industrial instruments including modern awards, enterprise agreements and individual employment contracts. These instruments meet or exceed minimum entitlements required for all Australian employees under National Employment Standards.

Skilled workers

During FY24, our direct workforce included 205 visa holders⁴ – skilled migrant workers. Their direct employment means our visa-holder employees have the same entitlements as Transurban's domestic-resident employees, including access to grievance channels, training in using these mechanisms and options for raising concerns anonymously.

More than
4,100
people in our
direct workforce

94, 5, 1
percentage of full-time,
part-time and casual
direct employees

91, 8, 1
percentage of direct
employees across
Australia, US and Canada

205
direct employees
who are visa holders

1 As at 30 June 2024. Our direct workforce includes employees (including casual, fixed term and permanent employees and excluding leave of absence and non-executive directors), temporary workers and workers contracted through our partner organisations

2 Five Transurban sites are operationally managed by external organisations. Transurban employees may also operate from non-Transurban-managed sites, including on connected asset networks

3 Sites include control rooms, depots and operational locations that are not offices

4 Valid visa types with permission to work. Remaining direct employees have appropriate working rights through citizenship

Team members inspecting a Brisbane asset



Our supply chain¹

We have 22 assets in operation and three major projects expected to open by 2026. In our work we partner with a diverse range of suppliers including global multinational construction contractors, international technology providers, consultants and local and social enterprises, with the majority located in the countries where we operate.

Our supply chains are complex networks of large, medium, and small businesses providing goods and services. Our procurement activities reflect the lifecycle of major road infrastructure projects and include products and services relating to road design and construction, and to operations and maintenance.

The industries, categories and suppliers we used to provide goods or services to support our operations remained consistent with previous years. Our major procurement activities included bridge, road-deck and barrier construction and tunnel fit-out works on the West Gate Tunnel Project (Melbourne), and traffic changes and early construction works on the M7-M12 Integration Project (Sydney). Further, the 95 Express Lanes Fredericksburg Extension opened to traffic in August 2023.

We used around 380 alternate suppliers³ this year compared with FY23, representing around 6% of our total spend. More than 130 of these suppliers were new to Transurban.

More than 99% of our FY24 spend was with suppliers with trading sites or headquarters in Australia, the United States or Canada (Figure 6). Recognising labour risks may be greater upstream from our direct suppliers we have (so far) identified more than 275 Tier 2 suppliers – that is, businesses our direct suppliers have contracted with or have proposed to contract with when delivering goods or services to Transurban. We have so far used our supplier assessment tools to assess eight of these identified Tier 2 suppliers, including reviewing their modern-

slavery-risk controls and actions and checking for potential vulnerable upstream labour.

This year we also implemented an updated supplier onboarding process that formalised supplier pre-qualification assessments. The new process includes mechanisms for triggering risk-based questions (on topics such as labour and modern slavery, design, quality, health and safety, environment, and information security) and helps determine what documentation is required to support due diligence during supplier onboarding assessments (see Due diligence tools on page 21).

Our top FY24 supply chain categories (comprising more than 84% of our total spend) are listed below. See Figure 7 for a breakdown of spend per category.



Major project construction



Operations and maintenance



Professional services and consulting



Technology

See Table 1 (next page) for more information on these spend categories.

More than
\$1.75B
in annual managed spend

1,500+
direct suppliers

Over
91%
spend with Australian suppliers

275+
Tier 2² suppliers mapped

\$11.28M
spent with social benefit suppliers

Figure 6: Managed spend by region

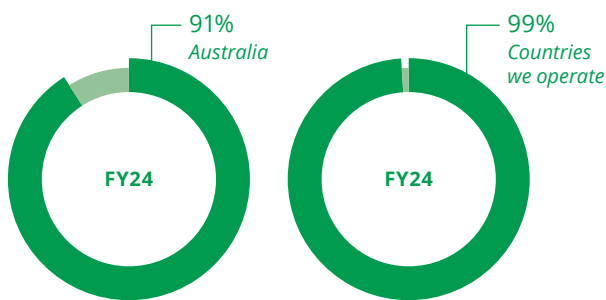
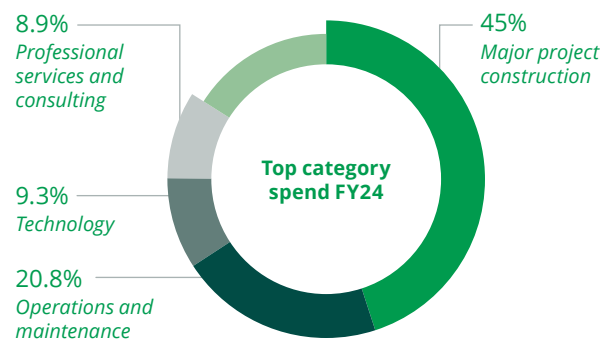


Figure 7: Top managed spend by category



¹ All data in this section excludes the WestConnex group





² Tier 2 suppliers are suppliers contracted to our Tier 1 suppliers, where Transurban does not have a direct contractual relationship

³ Alternate suppliers includes new suppliers and suppliers who were not used by Transurban in the immediate prior reporting year.



Maintenance works on the Hills M2, Sydney

Table 1: Top four spend categories and associated activities

| Category | Activity | Suppliers | Typical activities |
|---|---|---|---|
|  Major project construction | Designing and constructing new roads and delivering major upgrades to existing roads | Selected design and construction suppliers Supplier subcontractors | <ul style="list-style-type: none"> • Heavy works: drilling; pilling; excavation; tunnel boring • Mechanical and electrical: wiring; lighting; pumps; jet fans; installing deluge, ventilation and Intelligent Transport Systems (ITS) • Management: project and engineering • Other: wire mesh; structural steel, shotcrete, precast and in-situ concreting; asphalt laying; painting |
|  Operations and maintenance | Maintaining road safety and operating standards in line with contractual requirements | Selected incident response and maintenance suppliers Supplier subcontractors | <ul style="list-style-type: none"> • Road-specific operations and maintenance activities: civil, mechanical and electrical works; and incident response services. Road maintenance works may involve some of the construction activities described under Major project construction above. • Suppliers may appoint subcontractors to deliver some activities. |
|  Professional services and consulting | Delivering services to corporate management | Selected consultants | <ul style="list-style-type: none"> • Desktop-based specialist services: legal support; strategy development; and general business and financial consulting. |
|  Technology | Providing hardware, software and technical expertise | Selected technology suppliers | <ul style="list-style-type: none"> • Information and communications technology: information and communications hardware; ITS hardware and software; technology consulting; maintenance; support; and software for our offices (including application licenses) and operations (including mobile apps). |

Labour in our supply chains

We use both direct and indirect labour services. Indirect labour services are used for activities such as:

- road maintenance services: for example, landscaping, electrical and mechanical trades, incident response services and machinery operators

- multi-year infrastructure construction delivery: for example, truck drivers, asphalt paving and civil contractor services
- skilled labour: for example, contingent workforce, professional services, consultants and the labour workforce used in our corporate supplier partners.

Indirect labour services also exist upstream in our supply chains: for example, factory labourers manufacturing goods, materials or components; transport, shipping and logistics workers; and further labour is used in subcontractors through each tier of the supply chain.



Some labour services include casual or migrant workers, with labour sometimes delivered in shifts, such as overnight and weekend construction works; 24/7 incident response services and office cleaning staff. Road maintenance works are also often delivered overnight to minimise road-user disruptions. In FY23 we reported on our implementation of a supplier evaluation tool that also helps us identify and track the use of migrant labour in our supply chains. We have continued to use this tool during the FY24 reporting period and, since its implementation, we have assessed more than 200 suppliers to determine if suppliers:

- have migrant visa-holding employees: 45 suppliers have disclosed visa holders in their operations
- use certified labour-hire providers or are themselves certified labour providers: seven applicable suppliers hold labour-hire licenses and 53 suppliers have identified labour-hire use in their operations
- had collective bargaining agreements (CBA) established in their workplace: 18 suppliers demonstrated they had CBAs in place.

Managing our supply chains

Centralised project, operations and divisional teams continue to manage Transurban's major project supply chains and operational procurement activities – unchanged from previous reporting years. Our procurement policies and procedures establish how we and our suppliers work together, including how we assess and address modern slavery risks.

We do not tolerate critical breaches of our policies and procedures, where suppliers fail to commit to corrective actions within agreed timeframes. In such cases, we would seek to terminate the commercial relationship. But we also do not walk away from suppliers facing genuine difficulties in achieving compliance with our policy and procedural requirements. Our aim is to support suppliers so that difficulties can be addressed. We work to enable this through listening to and engaging with our suppliers, for example through our Supplier Relationship Management program (see page 25).

We continue to work to understand and map the complex layers of our supply chains to improve our effectiveness of assessing and addressing supply chain risks, including modern slavery risks to people. We continue to review, and strengthen where necessary, our policies and processes to reduce any potential involvement in causing or contributing to adverse impacts to people. For more information see Governance on page 17.

Continuing to identify our supply chains beyond Tier 1

In our FY23 statement we described our work on identifying and mapping our Tier 2 supplier relationships, including where commercial arrangements require our direct contractors to disclose sub-tiered suppliers to us. During FY24, we continued capturing and assessing information about Tier 2 suppliers and the potential risks to people associated with goods and services in our upstream supply chains. To date, we have

identified and captured information from more than 275 Tier 2 suppliers. We have also analysed our Tier 1 suppliers' disclosures to better understand their supply chains and exposures. For example:

- our Tier 1 suppliers commonly engage with Australian suppliers
- exposure to countries in Tier 2 and beyond (79 countries identified in desktop research)
- modern slavery risks identified deeper in these supply chains.

These insights are helping us deepen our understanding of the potential risks of modern slavery within our supply chain categories. By identifying the exposure countries and types of modern slavery existing in these supply-chain categories and countries, we are better equipped to recognise risks and instances of slavery further along our supply chains. For an example of our Tier 2 supply chain activities, see Assessing Tier 2 PPE factory audits on page 21.

Transurban entities without supply chains

Transurban's structure includes entities (for example, Reporting Entities) that do not engage with suppliers to purchase goods or services and have no direct supply chain exposure to modern slavery risks.



Modern slavery risks

We recognise the importance of identifying modern slavery risks within our operations and our supply chains. We also recognise the widespread nature of modern slavery means people perpetrating or those trapped in situations of modern slavery may potentially travel on our roads. Understanding this risk means we can seek to equip our teams to respond appropriately in the event that a potential instance is detected.

The United Nations Guiding Principles on Business and Human Rights (UNGPs)¹

The UNGPs establish a framework for businesses to guide the prevention of, and response to involvement in, human rights harm – including modern slavery (see the example shown in Table 2). Our risk-assessment processes are designed to align with this framework. This includes assessing how we could potentially cause, contribute, or be directly linked to potential or actual instances of modern slavery. Transurban’s risk identification and assessment processes also apply to Transurban owned or controlled entities.

Sustainable Procurement Risk Heat Map

Our Sustainable Procurement Risk Heat Map provides a macro view of the goods and services’ procurement categories with potentially higher risks (likelihood and severity) of modern slavery occurring. The map examines the scope and scale of potential modern slavery impacts (based on prevalence and vulnerability of population) and the irremediable character (severity) of these impacts.

The map also shows the proximity of these impacts to Transurban, and whether we may

cause, contribute, or be directly linked to these impacts, as well as the likelihood of these impacts occurring. The map was adapted from Transurban’s Risk Management Framework² and is informed by ISO 20400 Sustainable Procurement Guidelines and the UNGPs. We update it at least annually, primarily via data provided by our Tier 1 suppliers (for example, country, industry and commodity data).

Additionally, our assessment considers higher-risk activities that may exist deeper within our supply chains (for example, risk associated with labour in the manufacturing of components, or labour used in the extraction of raw materials) when we attribute risks. However, we acknowledge supply chains can be complex and our risk-identification approach will evolve as we identify and assess these deeper supply chain activities.

Our risk heat map uses the information sources outlined in Appendix C, and during this reporting period was again refreshed with our spend categories and geographical sourcing locations.

Risk assessment outputs

Operations

Our FY24 risk assessment, as in previous years, found Transurban’s operations put our people at low risk of modern slavery. This assessment

is based on multiple factors, including:

- Our operations are in countries whose jurisdictions are considered to have lower modern slavery risks on a global comparison, due to stronger employment laws and enforcement
- The office and site locations, job roles and activities undertaken in our direct operations have not generally been identified as being high-risk
- Our direct employees have formal contractual arrangements that are provided in their first language and that are guided by internal policies, principles and practices put in place by Transurban
- We consider our workforce to be highly skilled and based on international research reporting, this cohort of workers is generally at a lower risk of vulnerabilities that contribute to modern slavery
- Our operations workforce participates in awareness and training programs with content covering knowledge of rights, freedoms and access to grievance channels, including mandatory induction training on these topics for new starters and contingent workers and regular ‘refresher’ training
- Our workforce is engaged on employment terms that include fair remuneration, leave entitlements, work flexibility and freedom to unionise.

Table 2: Continuum of involvement framework example

| | Cause | Contribute | Directly linked |
|--|---|--|---|
| Involvement | Directly engaging in forced labour in its operations. | Acting to influence (for example, via contract negotiations) a supplier who then engages in modern slavery practices (such as debt bondage) to supply work. | Unknowingly engaging a supplier that uses modern slavery practices (including deceptive recruiting) in providing its goods or services. |
| Expected response actions and remedies | <ul style="list-style-type: none"> • cease or prevent the situation • provide or cooperate in legitimate remediation. | <ul style="list-style-type: none"> • cease or prevent any contribution • use leverage to mitigate remaining impacts • provide or cooperate in remediation in line with any involvement. | <ul style="list-style-type: none"> • seek to prevent and mitigate the impact • use leverage to play a role in remediation to the extent possible. |

¹ *Guiding Principles for Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, [UN Global Compact](#)*

² *For more information on our risk management approach, see our [FY24 Corporate Report](#), page 79*



At an operational level, our potential involvement in modern slavery risks to people principally relates to our four corporate-structure entities that employ staff. Most (88%) Transurban employees are directly employed by Transurban Limited. In FY24, our direct workforce included:

- visa-holding employees: 191 (Australia); 14 (United States)
- part-time employees: 115 (Australia); one (United States)
- casual employees: 16 (Australia); one (United States).

We have established mechanisms to prevent causing modern slavery within our operations, including providing our people with clear employment contracts, and maintaining appropriate internal policies, procedures and practices (see page 18).

All Transurban employees are free to engage in collective bargaining and can leave their employment without material restrictions. Our employees also complete mandatory workplace training on ethical business practices, anti-bribery and corruption, harassment, bullying, discrimination, whistleblowing services and grievance channels (see Grievances and remedy on page 23). Employee understanding of key issues is assessed within training modules; and training completion is included in our employees' performance requirements.

Vulnerable group identification

We recognise some groups may be more vulnerable to modern slavery risks, including

contract and contingent-managed workers. As these workers are contracted through professional services labour firms, they are included in our supply chain risk assessment. However, we consider these workers are likely to also be low risk of modern slavery due to their skills and expertise, the duties they perform and the locations where they provide their services.

In FY24, we refreshed our recruitment panel, including those organisations that provide contingent workers to Transurban. Due diligence completed on these partners was aligned with our supplier evaluations (see pages 24-25) and included our newly implemented enterprise supplier onboarding process (see page 21). These checks included reviewing suppliers' labour-hire licenses, policies and processes to prevent and assess their own modern slavery risks.

Supply chain focus

Transurban's more inherent modern slavery risks exist within our supplier relationships, where our involvement could link us with negative impacts to people. These risks can be inherently higher due to the geographic locations where goods are made or services are performed, such as countries with no or low protection for workers, or a weak rule of law. The types of industries or sectors also indicate varying degrees of risks to people due to common poor practices, reliance on low-skilled labour, temporary labour, migrant labour or other groups of people who may be more vulnerable to modern slavery risks. For this reason, our modern slavery risk

management approach includes a strong focus on our supply chain relationships and activities.

During FY24, we continued assessing our supply-chain relationship risks, and engaged with our suppliers directly and through industry engagement to discuss and drive modern slavery risk mitigation capabilities. Given our overall supply chain's size and complexity, we prioritised collaborating with our Tier 1 suppliers in both assessing and addressing modern slavery risks in our shared supply chains.

Priority risk categories and assessment

Our supply chains include priority-risk categories, explained in Table 3 (page 16). This table also details our priority-risk-category management response.

Across all identified priority-risk categories, our FY24 assessment activities indicated it is unlikely Transurban would cause or contribute to modern slavery due to the proximity of modern slavery risks more likely to occur in complex upstream supply chains. However, we recognise we could be directly linked to labour rights and modern slavery impacts through our supply chains.

We also recognise these risks could be enabled or exacerbated through action or inaction by any actor in our supply chains, potentially leading to negative impacts on vulnerable people. If these circumstances occurred, any linked involvement could potentially be elevated to 'contributing' to negative impacts.



Traffic control room, Brisbane



Table 3: Priority risk categories and responses

| Priority risk category | Vulnerability, prevalence and modern slavery inheritance | Transurban's priority-risk responses |
|----------------------------|---|--|
| Onsite cleaning services | <p>Cleaning services is considered a high-risk category due to the industry's reliance on: migrant, visa holder and gig workers; subcontracted labour; the basic skillsets required; and limited barriers to accessing work.</p> <p>All these elements increase cleaning services workers' vulnerability to labour, modern slavery and human rights abuses – for example, debt bondage, forced labour or coercive and exploitative situations. Our FY24 supplier evaluations continued to indicate both cleaning and general labour services as a recognised risk in our indirect supply chains.</p> <p>We engage with our direct contracted suppliers on addressing these risks. Given the industry's ongoing high-risk status, including its labour sources and established operational practices, vigilance remains necessary.</p> | <ul style="list-style-type: none"> Reviewed our supplier evaluations for cleaning contractors Multilingual posters (in targeted languages) are displayed in our offices' cleaning cupboards, including an easy-access QR code Contract management meeting engagement includes sharing actions to prevent risks to vulnerable cleaners |
| Construction materials | <p>Our major projects and operations and maintenance activities include the use of raw materials and components that may be assembled in, or originate from, countries where people are more vulnerable to labour and modern slavery risks, and where modern slavery is more prevalent.</p> <p>Construction materials such as steel, pre-cast concrete, imported materials, electrical equipment, components and wiring could potentially be manufactured at sites engaging in forced labour or deceptive recruiting. Further, raw materials used in components could be mined by exploited children in dangerous environments.</p> | <ul style="list-style-type: none"> Reviewed construction material providers using our supplier evaluation tool Identified additional Tier 2 suppliers and conducted desktop evaluations where information was available Continued our traceability supplier engagement, this time looking deeper into the steel supply chain Raised awareness and advocated across our industry (see Case study page 28) |
| Promotional items and PPE | <p>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. Because of this, we consider these categories to be higher risk.</p> <p>These items are mostly imported, and items or raw materials used in the manufacturing process could be produced using state-sanctioned forced labour, or other types of modern slavery deeper within supply chains.</p> | <ul style="list-style-type: none"> Reviewed our supplier evaluation of promotional item and PPE vendors Received, reviewed and assessed audits of Tier 2 factories manufacturing our most common purchased PPE items (see page 21) |
| Physical security services | <p>Physical security services have been prioritised due to this work's 24/7 nature, and its use of casual, on-demand and subcontracted workers, including migrant and visa holder workers. The security services industry has historically identified labour issues, and physical security services suppliers potentially have severe labour issues and modern slavery instances. These may include coercion, debt bondage, withholding of documents or working under threats, all of which may be more prevalent when security services are subcontracted.</p> | <ul style="list-style-type: none"> Reviewed our supplier evaluation of security service providers using our supplier evaluation tool |

We also recognise that further categories of risk exist, including technology and Information and Communication Technology (ICT). We assess technology and ICT equipment suppliers via our detailed supplier evaluation process and continue to track their actions and disclosures to assess and address modern slavery risks. Many of these suppliers are large multi-national technology providers who have significant leverage with global supply chains to address risks.

Downstream and other business relationship risks

Safety is a key focus at Transurban, including the safety of our customers, communities and people who may be negatively affected by our road operations or construction activities. This includes the safety of customers and community members (our downstream value-chain) who may be vulnerable to financial issues, potentially including vulnerability to labour exploitation or modern slavery situations.

During FY24, we continued engaging with suppliers providing incident response services on our roads. This year we contracted a new incident response service provider in Queensland, and in partnership with this supplier, we trained these first responders on forced labour,

human trafficking and other forms of modern slavery. We also trained our US traffic control room operators and our US supplier's incident response services team members, including providing information on US-specific issues, practices and indicators.

Attendees shared their own experiences and observations from real-life potential incidents and workshopped strategies for responding to incidents where road-users could be agitated or distressed (for example, when responding to a crash or an incident involving family violence). Attendees were also given information on internal and external avenues for reporting suspected modern slavery incidents. All training sessions were tailored to the local conditions and prevailing types of modern slavery commonly identified in those areas.



Our approach

While our overall approach to managing modern slavery risks has remained consistent across all reporting periods to date, we are continuously working to improve and enhance aspects of our approach. Our approach to raising awareness and increasing skills across our organisation, suppliers and industry has evolved in step with our increasing understanding of modern slavery risks and mitigations. We have progressed, over time, from delivering online training for employees to in-person and collaborative workshops for operations and supplier personnel, with training content tailored to specific local environments, risks and operations.

Our established governance, due diligence, grievance and remedy procedures and processes are integral to our approach, and provide consistency and clarity for our workforce, suppliers and partners and the wider industry. Our modern slavery procedures and processes are proactively and collaboratively deployed with the goal of increasing overall understanding of modern slavery risks and the actions needed to address these risks. The training and capacity building we engage in with both staff and suppliers is strengthening our approach across our day-to-day operations.

senior leaders from across Transurban's operations including: procurement; sustainable procurement; sustainability; social licence; finance and business services; major projects; operations; health, safety and environment; belonging and wellbeing; compliance and privacy; legal; and customer and technology vendor services.

This group met 3 times during FY24, and each meeting included updates on modern slavery issues such as emerging

risks, legislative changes and our progress in combatting modern slavery, provided by our Sustainable Procurement Manager. The group also shared insights and discussed opportunities on topics such as:

- understanding the Australian Modern Slavery Act 2018 (Cth) statutory review, including amendments introduced by the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024 (Cth)

Governance

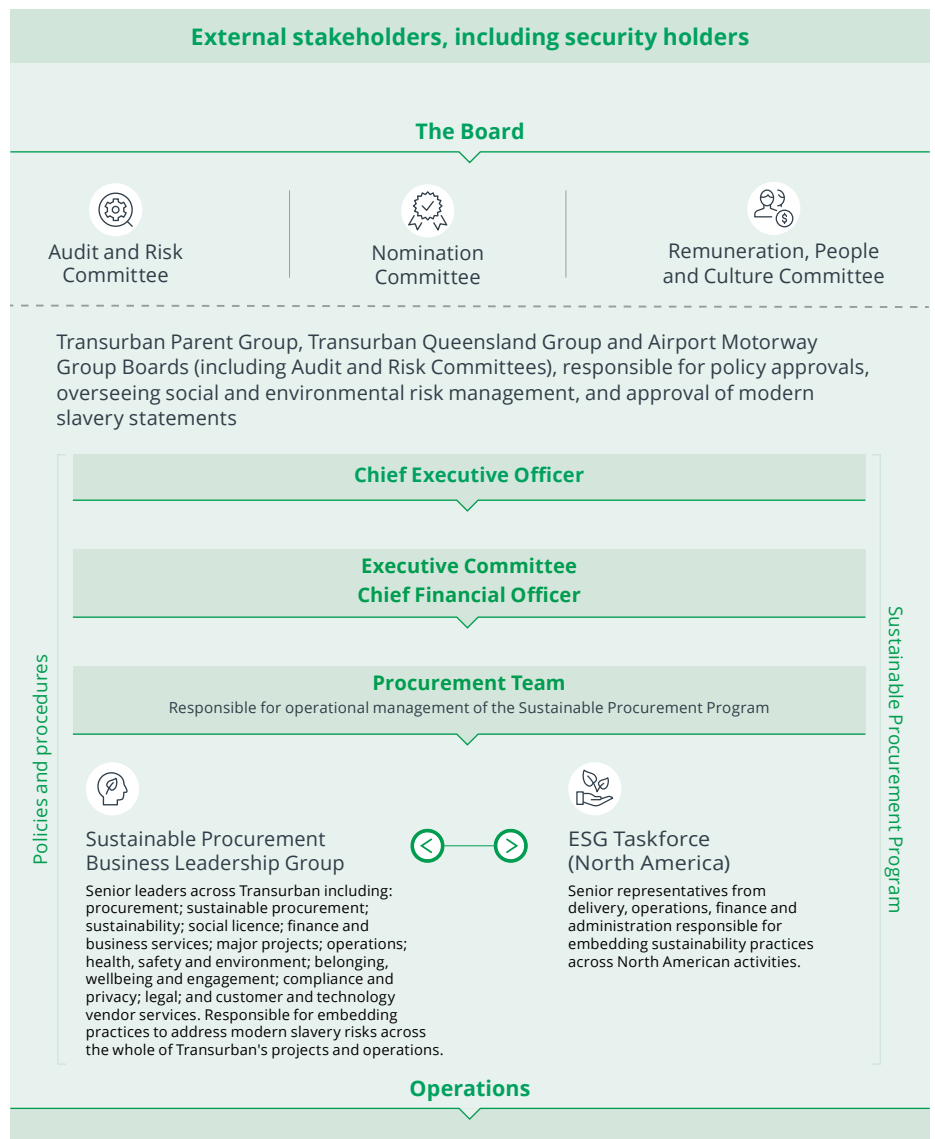
The Board has oversight of Transurban's wholly-owned and controlled entities. The Board's structure is described on page 8 and the modern slavery governance structure as set out in Figure 8. Our governance and risk management approach is detailed in our [FY24 Corporate Report](#) and in our [Corporate Governance Statement FY24](#).

Our Procurement Team implements our Sustainable Procurement Program. This program determines the actions that Transurban (and Transurban's owned or controlled entities) will take in assessing and addressing modern slavery risks. The Procurement Team reports to our Chief Financial Officer and provides updates, through functional reporting channels, to the Board and Executive Committee.

We commission expert input into both our modern slavery statements and our sustainable procurement program to identify improvement opportunities – with our first review conducted six years ago, in 2018. We also collaborate with experts in developing and delivering targeted modern slavery training. We also review best-practice guidance, new and emerging research, global and sector benchmarking and external assessments to help us improve our approach.

Our Sustainable Procurement Business Leadership Group oversees the implementation of agreed actions for assessing and addressing Transurban's modern slavery risks and broader sustainable procurement activities. This group comprises function heads, general managers and other

Figure 8: Modern Slavery Governance structure





- tracking Australian and international legislative reform, such as amendments to the the Fair Work Act 2009 (Cth) by the Fair Work Legislation Amendment (Closing Loopholes) Bill 2023 (Cth) and Labour-Hire law changes, the passing of S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) and changes to EU due diligence and reporting regulations
- collaborating with our Canadian joint venture partner to prepare and submit our first (joint) report under Canada’s new S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act
- delivering training and awareness raising within our organisation
- consulting on updates to our [Supplier Sustainability Code of Practice](#) and [Human Rights Policy](#)

- understanding existing and emerging labour and modern slavery issues in Australia and abroad, including raising awareness on migration statistics of vulnerable groups and heightened risks in conflict areas
- engaging with suppliers and industry on modern slavery, including through training and collaboration and through sharing progress and findings from our supplier evaluation tool and our supply chain mapping and traceability work.

Policies and procedures

Transurban maintains a suite of policies and procedures that set out our overall approach to managing modern slavery risks within our operations and supply chains. We report on these policies and procedures every year, with descriptions of each detailed in Table 4 below.

Our employees, contractors, suppliers and entities are expected to comply with these policies and procedures, and this expectation is reflected in our employment agreements and supplier contractual controls. Where businesses outside Australia are subject to local law requirements that necessitate adopting separate policies, Transurban expects these policies will be aligned, to the extent possible, with our own. Setting unified expectations and standards across our operations and supply chains, and driving consistent application of our policies, are key elements of our approach to managing modern slavery risks.

Table 4: Relevant Transurban policies and procedures

| Policy or procedure | Scope and description | Implementation |
|--|---|---|
| Employee Code of Conduct (CoC) | Details employees’ responsibilities on topics including bullying and harassment, equity and diversity, risk management, fraud and sustainability. | <ul style="list-style-type: none"> • available on our employee intranet and the Transurban website • mandatory annual review for all employees, including attestation |
| Human Rights Policy | Describes how Transurban aims to fulfill its human rights commitments, including reducing and responding to adverse human rights impacts (including modern slavery) and provides guidelines for actions on implementation. | <ul style="list-style-type: none"> • available on our employee intranet and the Transurban website • employee training provided within the Contract Management Framework process. |
| Sustainability Policy | Describes Transurban’s sustainability approach across four pillars: people (including the safety of people in our operations and supply chains); planet; places and partnerships; and demonstrates how our approach supports the UN SDGs. | <ul style="list-style-type: none"> • available on our employee intranet and the Transurban website. |
| Supplier Sustainability Code of Practice (SSCoP) | Sets out the minimum standards and leadership expectations new and existing suppliers must meet – including for labour and human rights; and encourages suppliers to go beyond legal compliance in advancing their social and environmental approaches. | <ul style="list-style-type: none"> • available on our employee intranet and the Transurban website • included in supplier contracts • employee training provided within the Contract Management Framework process • supplier performance tracked via our evaluation tool. |
| Whistleblower Policy | Explains how Transurban supports reporting of issues including reporting indicators of potential or actual cases of modern slavery. Provides information to support trust and transparency in the mechanism and process of remediation. | <ul style="list-style-type: none"> • available on our employee intranet and the Transurban website • annual employee training • electronic signage and posters displayed at our workplaces • regular reporting to management and Audit and Risk Committee |

Public



Table 4: Relevant Transurban policies and procedures – continued

| | Policy or procedure | Scope and description | Implementation |
|----------|---|--|--|
| Public | Diversity and Inclusion Policy | Details our commitment to diversity, equity and inclusion at all levels of the organisation, including its importance in driving our organisation's success and its relationship to our values. Also details our commitment to providing harassment-free and inclusive working environments, flexibility, pay equality, and equitable opportunity. | <ul style="list-style-type: none"> available via our employee intranet and the Transurban website measurable diversity and inclusion objectives are reported in our Corporate Governance Statement FY24 annual objectives are set in the context of Transurban's strategy, purpose and operating environment. |
| | Anti-Bribery Corruption and Fraud Policy | Outlines our approach to preventing, detecting, deterring and managing bribery, corruption and fraud risks. Applies to our employees, contingent workers, consultants and suppliers. | <ul style="list-style-type: none"> available on our employee intranet and the Transurban website gifts and benefits register mandatory annual employee training accompanying procedure regular reporting to management and Audit and Risk Committee |
| | Conflicts Management Policy | Details our approach to managing conflicts of interest; potential or actual conflict of interest declaration requirements; and appropriate response strategies. Applies to employees, contractors, consultants and suppliers. | <ul style="list-style-type: none"> mandatory annual employee training conflicts of interest register available on our employee intranet and the Transurban website accompanying procedure regular reporting to management and Audit and Risk Committee |
| Internal | Procurement Policy | Details our commitment to aligning with ISO 20400:2017; and to include sustainability considerations (including human rights) in our sourcing processes. Sets out procurement requirements, including: high-risk category triage; risk heat map use; contract and purchase order processes; and policy breach measures. | <ul style="list-style-type: none"> available on our employee intranet policy is included in Contract Management Framework training our legal chat bot provides automated guidance. |
| | Employee Policy Handbook (US) | Supports US employees in understanding their rights and their responsibilities in complying with employee conduct expectations. Includes US-specific information on harassment, misconduct, anti-bribery and corruption, overtime, employee entitlements and whistleblower services. | <ul style="list-style-type: none"> provided to employees upon hiring for review and confirmation. available on our employee intranet regularly reviewed and updated key topics covered in our internal Code of Conduct attestations. |
| | Employee Policy Handbook (Quebec) | Supports Quebec employees in understanding their rights and their responsibilities in complying with employee conduct expectations. It includes Quebec-specific information on employee rights, harassment, bullying, misconduct, anti-bribery and corruption, overtime, employee entitlements and whistleblower services. | <ul style="list-style-type: none"> provided to employees upon hiring for review and confirmation available to access via Quebec SharePoint site provided in French language reviewed and updated as required |
| | Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines | Details how employees can raise issues relating to actual or potential modern slavery in our supply chains. Explains triage and assessment processes and remediation actions. processes align with our Whistleblower Policy. See Grievances and remedy on page 23 for more information. | <ul style="list-style-type: none"> available on our employee intranet included in our Contract Management Framework training and tailored modern slavery training |
| | Contract Management Framework <i>Contract Management Policy adopted in FY24</i> | The framework and policy requires team members to adhere to a standardised contract management and administration approach. It also describes contract management roles and accountabilities and provides guidance for employees on responsible and sustainable procurement activities. | <ul style="list-style-type: none"> available on our employee intranet mandatory requirement for strategic and collaborative contracts (high risk and high value) reviewed annually regular training sessions provided to contract managers on this framework. |



For more information on our policies and our approach to ethical conduct and responsible decision making, see our [Corporate Governance Statement FY24](#). Copies of our key policies are available on the [Transurban website](#).

Supporting small businesses and social enterprises

Considered purchasing practices can help reduce downward pressure on supply chains – a potential contributor to modern slavery occurrences. Transurban is a signatory to the Australian Supplier Payment Code,¹ led by the Business Council of Australia. This is a voluntary code that asks signatories to

pay eligible “small businesses” on time and within 30 days of receiving a correct invoice.

In the first half of FY24 3.3% of Transurban’s overall Australian spend was with small businesses (as defined in the Code), and we paid 99.4% of Australian small businesses within 30 days. In the second half of FY24, 3.4% of our overall spend was with small businesses, and we paid 98.8% within 30 days. In total, in FY24, we paid \$102m to 565 small businesses in Australia.

In FY24, we extended further support to our social enterprise and First Nations suppliers, and are now paying these invoices within 14 days, giving these businesses additional cashflow confidence.



Supporting our Canadian joint-venture partners in advancing its modern slavery approach

This year we supported our Canadian non-controlled joint-venture (that operates the A25 in Montreal) in preparing its first report submitted under Canada’s S-211 Fighting Against Forced Labour and Child Labour in Supply

Chains Act (Canadian Act). Actions in collaboration with Transurban and the A25 team completed in FY24 included:

- updating the A25 Supplier Sustainability Code of Practice
- aligning this code with Transurban’s Supplier Sustainability Code of Practice where appropriate
- updating a modern slavery, forced labour and child labour factsheet for employee reference and training.

A small team of 14 employees manages the A25’s operations, and the above documents, plus a copy of our joint submission under the Canadian Act were shared with team members to increase their awareness of modern slavery, forced labour and child labour risks; reporting obligations; current risk-mitigation controls; and available avenues for raising suspected-incident concerns.

A25, Montreal, Quebec

¹ [Australian supplier payment code](#) - Business Council of Australia (bca.com.au)



Our due diligence

Our due diligence processes support our assessment of and responses to modern slavery, material environmental and identified human rights' risks. Our approach to assessing actual or potential modern slavery risks remains holistic. We track how we and our suppliers meet our policies and contractual requirements, we integrate our findings, and we use the overall picture to identify opportunities for improving our actions and processes.

Figure 9 shows, in general terms, how we have integrated due diligence activities into our supply chain management – including the key controls, tools and processes we use across the procurement lifecycle. As shown, assessments are conducted at multiple points in the procurement lifecycle, including actions to test whether our procurement could cause, contribute or be directly linked to potential or actual instances of modern slavery or adverse human rights impacts. This includes reviewing our potential spend against high-risk categories.

During FY24, 32 suppliers were triaged through to our Sustainable Procurement Manager for investigation and assessment of their labour and modern slavery actions through the deployment of our new enterprise supplier onboarding tool.

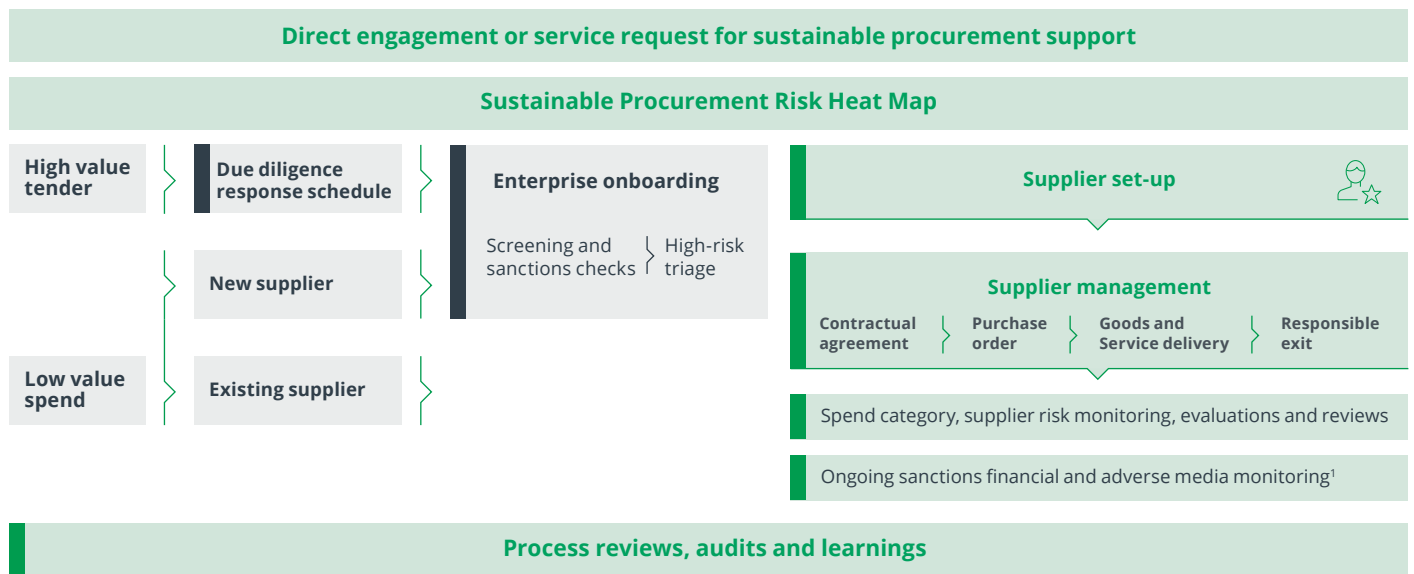
We continue to learn from our supplier engagements and use these learnings to improve our processes to better mitigate and reduce risks to people in our extended supply chains. We have also completed due diligence assessments for business partners and

customers as members of their supply chains and through our connected relationships.

Due diligence tools

We conduct due diligence throughout the supplier engagement lifecycle, via the tools described in Table 5. These tools collectively drive ongoing risk monitoring, tailored to each procurement stage. Our due diligence approach is under constant review, including through collecting stakeholder feedback, to improve our effectiveness at identifying risks.

Figure 9: Modern slavery due diligence process – suppliers



1. See Digital risk monitoring callout on page 22
This table represents a simplified process map of key modern slavery risk triage points and tools and processes involved to identify and monitor risks of modern slavery in our supply chain

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

Assessing Tier 2 PPE factory audits

During FY23, we enhanced our due diligence approach to high-risk category promotional item and personal protective equipment (PPE) suppliers by engaging with them to request further information on Tier 2 factories upstream in our supply chains.

Conducting independent social and labour audits in offshore factories provides greater oversight into the demographics of any vulnerable people, the conditions in the workplace and potential risks to people.

Our supplier collaboratively shared details from social labour audits undertaken at Tier

2 factories producing our most commonly purchased PPE items – items that help keep our workforce visible when onsite.

This year, we reviewed these audits provided by our supplier.

All identified factories producing these selected PPE items were based in China.

Audit findings and observations included a number of labour related indicators which were raised by the auditors.

None of these findings were assessed as critical non-compliances due to worker awareness, and their voluntary nature.

Other observations included worker's access to and awareness of mechanisms for raising concerns. Grievance channels, including hotlines, confidential email or worker representation were available and known to all workers.

Corrective Action Plans (CAP) have been agreed with the factory managers and the relevant issues are planned to be resolved in line with auditor recommendations. We recognise that audits should not be solely relied on, and we will continue to support our direct supplier and provide available assistance to monitor and encourage the improvement and rectification of non-conformances.



Table 5: Due diligence tools overview

| Tool | Description | Use-case |
|--|---|---|
| Sustainable Procurement Risk Heat Map | Used by employees to map goods and services purchase categories against assigned risk levels. | Prior to engaging a supplier, employees can seek advice on contract inclusions and other appropriate measures. High-risk categories are used to triage new suppliers or contracts for investigation - see further tools noted below. |
| Tender response schedules | Used during major procurement activities (for example, purchases above a specified contract value). Schedules enable consistent due diligence and assessment across tender submissions. All proponents must provide evidence demonstrating their ability to meet our codes and policies. Schedule questions align with the UNGPs, including covering mitigating risks to people in suppliers operations and extended supply chains. | An evaluation team assesses tender response schedules against agreed criteria based on the applicable scope of engagement. Assessment feedback informs the awarding of tenders. |
| Supplier screening | Used to conduct financial, director, and company ultimate benefit ownership checks to identify known issues such as labour concerns, illegal behaviour, insolvency risks and other indicators that may lead to adverse human rights impacts. | Our Procurement Operations Team reviews new suppliers against sanctions lists. Our Strategic Procurement Team conducts (as needed) independent financial and risks checks prior to contract award. Selected suppliers are also monitored via our digital monitoring subscription. |
| Supplier high-risk triage | Used to determine if new suppliers are providing high-risk goods or services, with high-risk procurement activities triaged to the Sustainable Procurement Manager for investigation. | Our investigations may comprise a desktop review, or potentially seeking additional supplier-control information from the supplier, the Transurban contract manager or both. We may decide not to onboard suppliers with insufficient controls, or we may require suppliers commit to improvement or corrective actions within specified timeframes prior to onboarding. |
| Enterprise supplier onboarding <i>New in FY24</i> | Used to survey suppliers (via questionnaires) prior to onboarding to gain early notification of potential risks. Available questionnaires cover specific topics, (including labour and modern slavery) and capture key information, capabilities, qualifications and risks. Completed surveys are managed digitally and are assessed by subject-matter experts for action as required. We are also re-qualifying existing suppliers for consistency in risk management actions. | Our Labour and Modern Slavery questionnaire enables the rapid triage of key risk profile indicators, such as migrant labour and visa holder visibility, and established policies and controls for identifying high-risk areas. Transurban may request further information, allocate a risk score, reject a supplier's onboarding application, or initiate supplier improvement expectations based on questionnaire responses. |
| Supplier evaluation tool | Used to assess suppliers' key modern slavery risk controls, including its own policies and processes and those applicable to its supply chains. This tool also captures granular information – such as supplier transparency and supplier risk mitigation score assessments – that supports improved future risk assessments. | Transurban's Procurement Team uses this tool in assessing tender submissions. It also serves as a guide and reference when we engage with suppliers on process enhancements and additional contractual requirements. |
| Contractual controls | Used to establish binding labour-related and modern slavery obligations for suppliers. For example, requiring suppliers to report potential or actual cases to us, and passing payments to contractors upstream in the supply chain (to reduce labour-related risks beyond Tier 1). | Transurban's Legal Team regularly reviews legal clauses for efficacy and enforceability. We also draw on external expertise to establish practical and best- practice contractual arrangements. |
| Credit card and purchase order reviews | Used to identify purchase orders and credit card spend in the high-risk categories identified in our risk heat map (described above). These reviews check, among other things, our spend with suppliers who have existing contracts, master services agreements and preferred panels. | Transurban analysts share spend categories and supplier data with the Sustainable Procurement Manager for review. Any learnings inform process improvements to better manage future transactions with specific suppliers or spend categories and to improve supplier requirements to better mitigate modern slavery risks. |

Digital risk monitoring driving earlier risk identification

In FY24 we introduced a digital risk-monitoring platform into our supplier-engagement procedures to:

- introduce risk-identification processes earlier in the supplier engagement process (prior to onboarding)
- enable additional ongoing monitoring throughout our relationships with selected suppliers.

We are now monitoring a sample of significant-spend and high-risk suppliers (currently around 100) via real-time analysis of internet data and sanctions lists, fiscal risks, tracking incidents and adverse company or director media coverage. This new layer of monitoring alerts us to potential issues for further analysis via more comprehensive risk reports as needed.



Grievances and remedy

Access to remedy is a core component of the UNGPs. If we were to cause or contribute to adverse impacts, we would provide for, or cooperate in, remediation through legitimate processes. Where applicable, we would also seek to exercise leverage –including contractual or legal rights to address any adverse human rights impacts or incidents in which we may be involved, including incidents relating to modern slavery.

We provide both internal and external channels for our employees, contractors and supply chain personnel to raise concerns on issues including potential or actual instances of modern slavery, as well as fraud, conflicts of interest, bribery and corruption. This includes an independent external whistleblower service that can be contacted via toll-free telephone, online or post. Reports to this service can be made anonymously.

In FY24, we continued to drive awareness of this service, including via tailored training sessions for contract managers, traffic control room officers and supplier incident response crews operating in the US and in Queensland. Information shared with each of these groups included overviews of modern slavery, including forced labour and child labour, what controls Transurban has in place to prevent and respond to these situations and tailored information and actions important for each of these groups. This included the risks and response in identifying human trafficking on our road networks.

Our grievance channels, including our independent external whistleblowing service received 13 reports during the reporting period. Eight eligible reportable conduct issues were investigated and remediated. None of these reports related to potential or actual instances of modern slavery.

A less formal channel is also available to our employees: individuals can raise issues internally via a Modern Slavery Query request form on our intranet. Issues raised are directed to our Sustainable Procurement Manager.

Remediation guidelines

Our Supply Chain Modern Slavery Grievance Mechanisms and Remediation Guidelines outline the steps we will take if potential or actual instances of modern slavery are identified in our supply chain. We recognise these issues can be complex and sensitive to navigate, so our guidelines are designed to prioritise the protection and support of identified victims.

These guidelines are available to all employees via our intranet. We aim to improve and develop these further as we continue to learn about effective remediation.

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

Training and capacity building

Our awareness raising, training and specialised capacity building is designed to better equip our employees and our supplier partners to understand how modern slavery may occur and flourish in our operations and supply chains, and how to identify and respond to modern slavery risks. Transurban employees complete mandatory online training on our policies and positions on:

- **Ethical business practices and privacy**
Our expectations related to giving and receiving gifts, benefits or entertainment; fraud, bribery and corruption; conflicts management; and how these topics relate to modern slavery; privacy and whistleblower policy and protections and support available to disclosers.
- **Equal opportunity and anti-discrimination**
Equal opportunity employment; workplace discrimination and harassment laws including state and federal laws; effects of workplace discrimination and harassment; what to do when faced with these behaviours in the workplace.
- **Respect at work and sexual harassment**
Workplace sexual harassment; and what to do if exposed to any form of harassment in the workplace.
- **Health, safety and environment (HSE) contractor management**
Our active client contractor management approach; how to implement contractor management assurance; employees' HSE role within our contract management framework.

- **Code of conduct** Our mandatory behavioural standards and obligations.
- **Whistleblower policy** Processes for raising concerns (including anonymously) including for situations of potential or actual instances of modern slavery.
- **Modern slavery** Modern slavery risks; stories from people with lived experience; extended supply chain risks; policies; indicators; what actions to take to raise concerns or for help.

Training deployment approach

Training in the above topics is deployed to all eligible employees¹ either annually or every two years. Training is supported by internal communications, intranet content (including relevant policy downloads) and websites. All training modules are also accessible as on-demand content.

In addition, during FY24, detailed training workshops on modern slavery, and key requirements under the Act were also held for procurement team members and key contract managers as part of our wider program, particularly linked to the refreshed enterprise onboarding process and our Contract Management Framework. We continued to conduct and support key supplier and wider industry workshops, designed to build collective working knowledge of and capacity to address modern slavery risks. Collaborating and sharing insights with like-minded industry partners improves overall understanding. For more information, see Collaboration and industry engagement on page 28.





Case study: Our supplier evaluation tool in action

Our supplier evaluation tool, summarised in Table 6, and established in FY22, enables our ongoing assessment and monitoring of our suppliers' modern slavery risk controls and governance, both in the suppliers' own operations and in their supply chains.

This year, we continued to expand our coverage of high-risk and priority-group suppliers assessed using our evaluation tool. We have now assessed and continue to monitor more than 80% of Transurban's addressable spend. During the reporting period, we added further issue titles to our assessments enabling tracking of indicators on actions to prevent discrimination and harassment and to promote equal opportunity and remuneration. We also introduced more extensive environmental and social sustainability requirements, aligned to the enhancements made to our Supplier Sustainability Code of Practice (SSCoP).

We are now using this tool to track our high-risk and high-spend suppliers on an annual basis, and the assessments of residual suppliers or business partners within a 24-month cycle.

Through extending our priority group assessments and expanding our evaluation coverage, we are seeing indications that suppliers are:

- increasing actions on managing modern slavery risks
- increasing disclosure of these actions.

We will continue monitoring this trend.

We saw an overall improvement in the percentage of suppliers and business partners providing information in line with our SSCoP minimum requirements, increasing from 49% in FY23 to 71% in FY24. Suppliers are also increasingly using self-assessment tools to identify risks deeper in their supply chains (62% in FY24) and are also conducting supplier audits (34% in FY24).

Our supplier evaluation tool is helping us better identify suppliers, industries or categories where people could be at an elevated risk of modern slavery due to vulnerability. We also note some of our assessed suppliers used labour hire (24%) and migrant labour (20%) in FY24. This data is helping to direct our risk focus.

The tool also provides insights into the sophistication of our suppliers and business partners' approach to modern slavery risk management. For example, we can determine a suppliers' current level of modern slavery governance by reviewing its existing modern slavery policies and implementation progress. An overview of our assessment tool findings is shown in Figure 10.

Extended data capture

This year we enhanced our supplier evaluation tool to capture 68 total data points (up from 65 in FY23), with:

- 33 data points tracking modern slavery, labour and human rights due diligence and risk management performance
- 14 data points tracking information assisting in modern slavery risk identification and deeper supply-chain exposure
- 21 data points tracking social and environmental sustainability actions.

We also now use this tool in our enterprise onboarding process – assessing suppliers prior to onboarding and enabling Transurban to request more detailed information prior to engaging with a new supplier. This process captures key information on our suppliers' supply chains, such as country exposure and raw material inputs and through this, gives us a greater understanding of potential modern slavery risks further upstream.

Supplier assessments are scored on measures outlined below in Table 6.

Table 6: Supplier evaluation methodology

Transparency score (quantitative)

This score reflects the number of key issues titles responded to, drawn from 33 data points informed by our core policy expectations, the UNGPs and Modern Slavery Act guidance material.

Risk management and health score (qualitative)

This score is based on the quality of actions taken, measured on a three-point scale, against an issue title.

Supplier Sustainability Code of Practice (SSCoP) alignment (compliance)

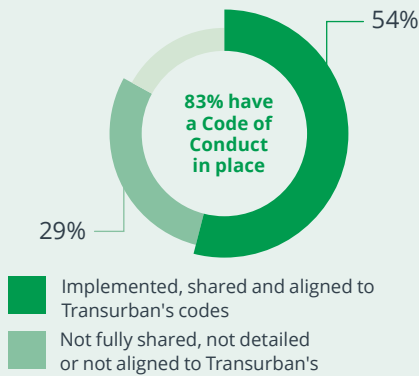
This score is based on five issues titles assessed against SSCoP minimum criteria and assessment of 38 issues titles.



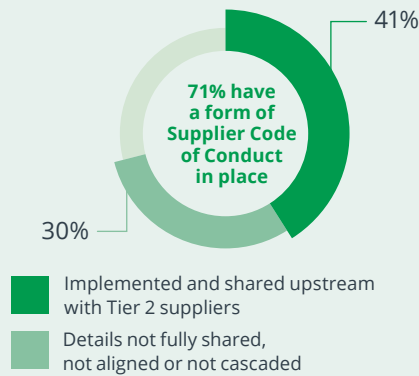


Figure 10: Assessed supplier findings overview

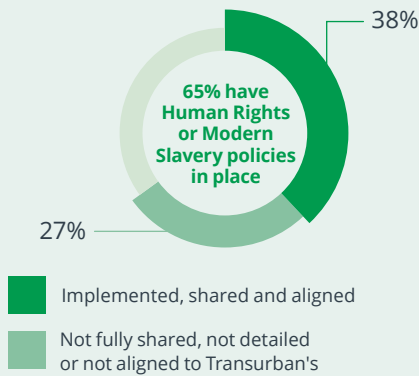
Code of Conduct



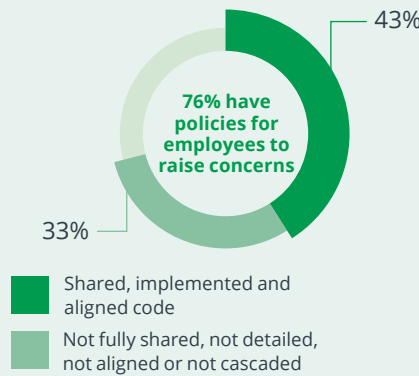
Supplier Code of Conduct



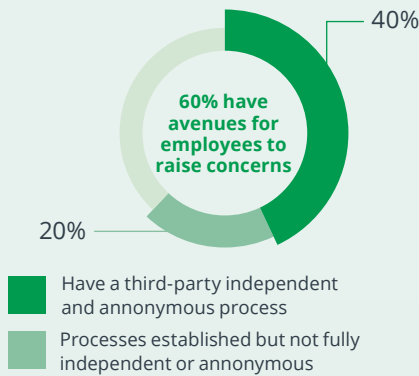
Human Rights or Modern Slavery Policy



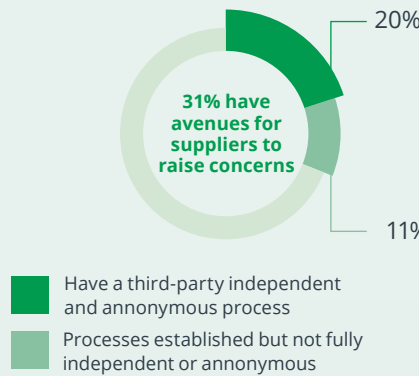
Whistleblower Policy



Operations Grievance Process



Supplier Grievance Process



Information is gathered from desktop research, publicly reported information, or direct sharing of information by suppliers

Enhancing two-way collaboration with suppliers

Our business partners and suppliers play a key role in our organisation's success, working with us to deliver safe and convenient transport solutions to our customers and communities. We aim to continuously strengthen supplier relationships, raise awareness of key issues and deliver responsible business outcomes. We do this through:

Supplier Relationship Management (SRM)

This program-based approach to building supplier relationships is helping us drive value in collaboration with our suppliers. Our SRM approach establishes a governance group structure for Transurban and the supplier to support our maximising opportunities together, including opportunities to engage on human rights and modern slavery. The program:

- fosters two-way dialogue on modern slavery, human rights and sustainability risks
- promotes sharing best practice and lessons learned, driving continuous improvement
- provides opportunities to deepen understanding of supply chains and upstream risks.

Surveys

We regularly survey our suppliers on critical information and supply chain risks that may affect our business or our stakeholders. Survey questions cover topics including labour, modern slavery and human rights risks. Supplier responses complement our ongoing due diligence and provide opportunities for future collaboration and engagement on surveyed issues.

Direct supplier engagement

We directly engage with targeted high-risk suppliers to drive awareness of modern slavery risks, transparent modern slavery risk reporting responsibilities and opportunities for positive community impacts. This engagement also helps us understand suppliers' maturity beyond their public reporting and helps drive proactive modern slavery risk management. It also help us establish open dialogues on topics such as increasing Tier 2 supplier visibility and upstream activities and preventing negative impacts to people.





Case study: Assessing controls, and processes to identify potentially vulnerable contractors

This year we conducted a pilot assessment, with maintenance supplier Ventia, during a tunnel maintenance closure in Sydney. The pilot evaluated the use of personnel credentials to identify potential improvements in our modern slavery controls.

To minimise traffic impacts, tunnel closures are conducted overnight, often starting in the early evening. Traffic management is deployed, the tunnel cleared of traffic, relevant tunnel equipment is deactivated to enable machinery operations and required maintenance works are conducted. When complete, machinery is removed, workers depart, tunnel equipment is reactivated and the tunnel is restored to service, usually by early morning.

For this pilot, we reviewed activities conducted prior to, during and after a tunnel maintenance closure. We wanted to understand:

- whether contractors or sub-contractors working in the tunnel could potentially be exploited or in a situation of modern slavery
- what processes our business and contractors have in place to prevent modern slavery practices from occurring during these works
- what checkpoints are in place to identify potential vulnerable people
- what opportunities exist to improve our checks and processes to reduce the risks to people.

Contractors, subcontractors and individual workers are required to provide information such as identification and qualifications (such as accreditations, licenses and competencies) for specific works prior to accessing the work site.

Our initial assessment found that both Transurban and Ventia employed multiple verification systems (including digital systems) to check and collect site attendees' identification, qualifications, accreditations and other required information.

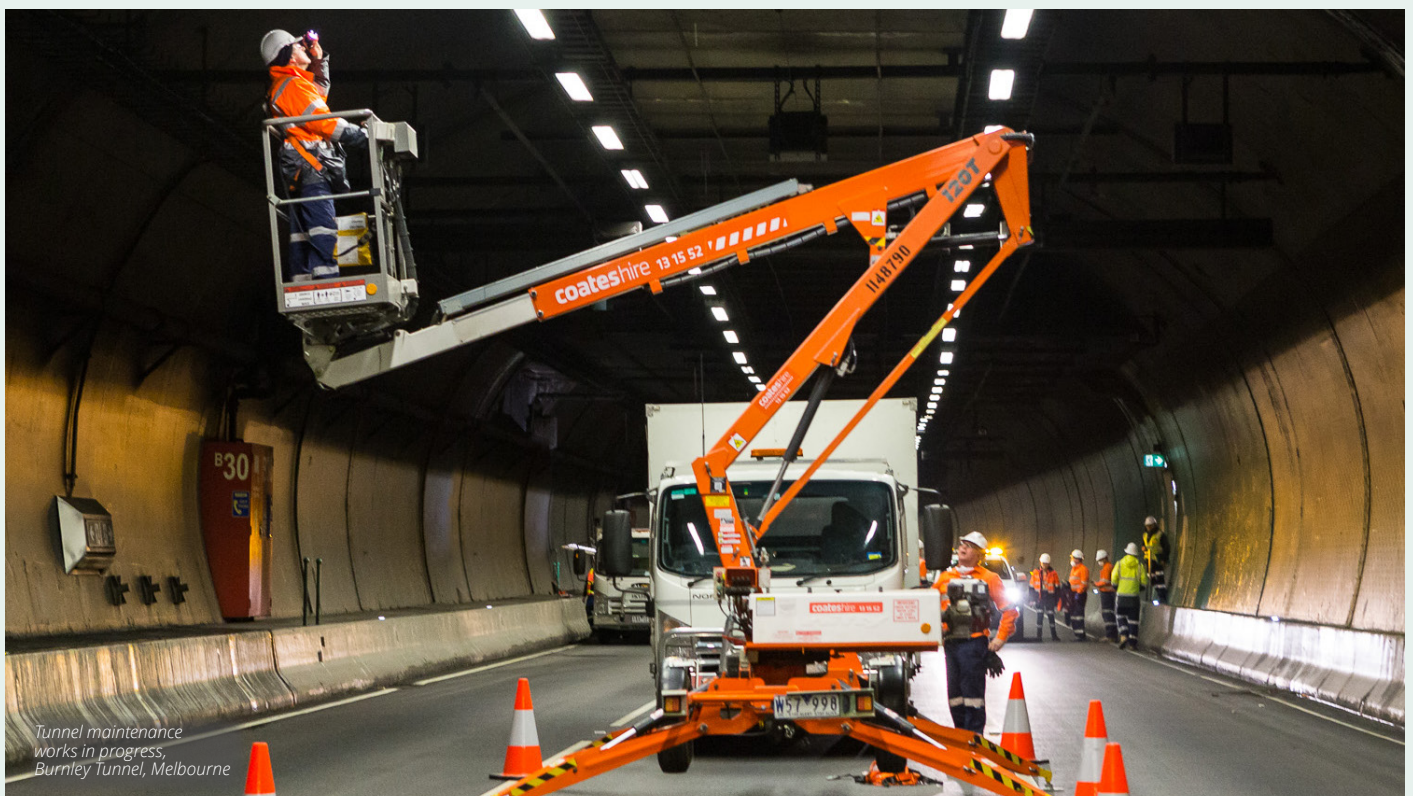
We found these tools and checks (and some types of qualifications and accreditations) – may reduce the likelihood of exploitation or modern slavery occurring during a maintenance event.

We also found some works did not require formally qualified workers, which potentially reduced some of these protections. Further, some roles required minimal documentation (for example, a driver license and a white card) and our assessment showed these could potentially be controlled by another person.

We supported this pilot by providing information about modern slavery to workers on the ground at the tunnel maintenance closure. This included a safety toolbox talk held on the night that highlighted the links between poor safety and labour practices and modern slavery. The talk also covered the importance of raising concerns, and whistleblower and other reporting services.

Ultimately, the pilot found Transurban and Ventia's compliance systems provide an extensive overview of various qualifications attained by workers who participated in the maintenance event. It also found safety, qualification and proof-of-identity checks represent significant opportunities to gather additional information to help assess working rights and potential vulnerabilities.

These findings will inform future reviews of relevant processes and supplier and subcontractor agreements.



Tunnel maintenance works in progress, Burniey Tunnel, Melbourne



Measuring effectiveness

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

We continue to seek and receive feedback from employees, suppliers, investors, industry groups, external specialist consultants, academia and non-government organisations (NGOs). We will continue evolving and maturing our processes to better measure the impact and effectiveness of our efforts.

Improvements introduced over the reporting period included:

- expanding the capability and application of our evaluation tool
- expanding our collaboration, training and awareness-raising actions
- conducting targeted research analysis on key materials and areas of labour.

We will continue to assess the effectiveness of our actions and those of our suppliers, including through quantitative metrics,

qualitative reviews and feedback, to identify opportunities for incorporating changes that enhance our continuous improvement approach. The controls, actions and indicator framework we currently use are shown in Table 7. Appendix C provides data on our progress in assessing and addressing these actions.

We believe our employees' awareness of modern slavery has deepened over time, as has their understanding of their roles in helping assess modern slavery risks and in raising queries or potential issues. We are seeing employees escalate modern-slavery-related queries on potential and current suppliers, including one example where we did not progress with a supplier in part because of the information we received.

RMIT University's Sustainable Procurement Disclosure Index

Transparency is a core part of the UNGPs and part of the intent of the Modern Slavery Act to increase accountability and awareness of actions that organisations take to assess and address human rights and modern slavery issues in their business operations and supply chains.

Our reporting approach was assessed during FY24 by RMIT University's Sustainable Procurement Disclosure Index. This new index rates how Australia's ASX 200 listed companies report on the sustainability of their economic, social and environmental sourcing practices. RMIT University says it hopes the tool will help Australians make better informed purchasing and investment decisions – and encourage businesses to improve how they report on their procurement. In FY24, Transurban was ranked no.1 on this index, receiving the highest score in each rating category.

Table 7: Performance measures and effectiveness indicators

| Workstream | Controls or action | Effectiveness Indicators |
|-----------------|---|---|
| Governance | Policies and guidelines related to human rights | Regular reviews of policies and guidelines relating to modern slavery |
| | External benchmarks | Global and national benchmark results, such as the Dow Jones Sustainability Index, the RMIT Sustainable Procurement Disclosure Index, and specific modern slavery disclosures benchmarks and reports |
| | Internal audit on controls | Auditing processes and controls relating to assessing and addressing modern slavery. Completion of actions in response to audit findings |
| | Internal governance | Convening of our Sustainable Procurement Business Leadership Group. Completion of meeting action items. Qualitative feedback from these leadership meetings on improvements in actions and their effectiveness Adherence to Contract Management Framework and Policy |
| | Sustainable Procurement Program key performance indicators (KPIs) | Meeting annual KPIs related 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 in relation to human rights including modern slavery used in sourcing activities managed directly by the procurement team Adherence to Contract Management Framework and Policy |
| Risk Management | 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 |
| Monitoring | Issues raised through our grievance mechanisms | Accessibility and utilisation of mechanisms Number and types of issues investigated and remediated |
| | Our Voice annual employee survey | Gathers feedback on engagement, confidence in leadership, customer focus, sustainability and social license, diversity and inclusion, work environment and more |
| | Supplier and Business Partners survey | Qualitative feedback to identify areas of focus where Transurban can enhance actions to collaborate with suppliers on mitigating modern slavery risks |
| | Supplier Relationship Management (SRM) program | Direct two-way consultation to identify areas of focus where Transurban and our suppliers can collaborate to implement innovative actions to investigate and mitigate modern slavery risks |



Collaboration and industry engagement

Transurban continues to contribute to industry progress in tackling modern slavery, including engaging on policy, collaborating on activities¹ and promoting awareness.

During FY24, Transurban representatives participated in a broad range of industry initiatives to share knowledge and learn from others. We also undertook joint initiatives with industry groups to drive stronger and more coordinated outcomes across the community. And we continue to upskill our team through both in-person and virtual learning sessions. We continue to engage with our industry peers to collectively act, share our knowledge where we can help others, and learn from peers and experts. Collaboration and engagement activities we conducted during FY24 included:

- Participating in Australian Government's Modern Slavery Expert Advisory Group, led by the Attorney-General's Department (our Sustainable Procurement Manager has been an advisory group member since 2020)
- Participating in the UN Global Compact Network Australia, including participating in the network's Modern Slavery Community of Practice – Optimising Stream. Our involvement includes: committing to the 10 principles; building our human rights and modern slavery knowledge; engaging with experts; sharing insights; and increasing supportive remediation networks.
- Raising awareness on modern slavery to procurement and finance industry peers, presenting at the Faculty's IMPACT! Summit in 2023
- Panellist at the UN Global Compact Network Australia's 2024 Australian Dialogue on Business and Human Rights
- Engaging with small and medium enterprises in the road construction industries, National Roads Expo, hosting a panel discussion in collaboration with Anti-Slavery Australia and one of our suppliers to discuss modern slavery risks to people
- Providing practical industry knowledge to PhD candidates to support academic development on modern slavery risks and responses and providing our time and experience to research projects at both Griffith and RMIT universities.
- Co-chairing the Infrastructure Sustainability Council's Modern Slavery Coalition (see case study opposite).

Case study: Collaborating with our industry on action

The Infrastructure Sustainability Council's (ISC) Modern Slavery Coalition was established in 2019, in response to the introduction of Australia's Modern Slavery Act. Transurban is an active member of this Coalition, that aims to accelerate the eradication of modern slavery from infrastructure's supply chains by shifting industry from a place of reactive compliance to one of transformational leadership.

During FY24, the ISC's Modern Slavery Coalition continued to work collaboratively to progress modern slavery-related capacity building and due diligence initiatives. These included:

- Convening a webinar for ISC members on modern slavery in the infrastructure sector which featured a presentation from the Office of the NSW Anti-slavery Commissioner about the NSW Government's expectations for suppliers to manage modern slavery risks, as well as information about broader modern slavery developments.
- Transurban and Ventia convening a session on modern slavery risks in the infrastructure sector at the IS Connect Conference.
- Exploring opportunities to strengthen members' approaches to supplier due diligence, including through discussing opportunities to uplift members' supplier questionnaires and streamline these across the industry, and managing responses to questionnaires.
- Facilitating an interactive information and Q&A session with a global PPE manufacturer at a Modern Slavery Coalition meeting, where they outlined their approach to modern slavery and broader labour rights work, including how they have addressed potential modern slavery concerns.
- Engaging with a major food and grocery company through a presentation at a Modern Slavery Coalition meeting to understand lessons learned from different sectors around addressing modern slavery, including in relation to supplier engagement.
- Providing regular updates to members on key global and local developments relating to modern slavery and broader human rights.



ISC Connect Conference, Modern Slavery in Infrastructure session - with speakers from Transurban and Ventia

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

Approval

Consultation

Transurban 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 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 includes 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, health, safety and environment, procurement, risk and legal).

During FY24, the Procurement Team also presented to the Boards of Transurban, Parent Group the Transurban Queensland Group and the Airport Motorway Group on the status of relevant procurement practices and the preparation of this Statement under the Act. This Statement has also been reviewed by the Executive Committee of Transurban, and executive representatives from the Transurban Queensland Group and the Airport Motorway Group, prior to being put to the relevant group boards for review and final approval. This joint 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 THL, TIL and TIML as responsible entity for THT for the Transurban Parent Group on 21 October 2024
- The Board of Transurban Queensland¹ for the Transurban Queensland Group on 28 November 2024; and
- The Board of Airport Motorway Holdings Pty Limited for the Airport Motorway Group on 2 December 2024



Michelle Jablko

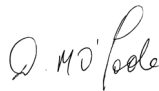
Chief Executive Officer



Craig Drummond

Chair, Transurban Group

As a responsible member of the Transurban Parent Group



Deborah O'Toole

Chair, Transurban Queensland

As a responsible member of the Transurban Queensland Group



Raymond Golzar

Chair, Airport Motorway Holdings Pty Limited

As a responsible member of the Airport Motorway Group

¹ 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 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)¹
- 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
- LCT-MRE Holdings Pty Limited ACN 145 311 477
- LCT-MRE Pty Limited ACN 143 401 870

together with Transurban Infrastructure Management Limited as responsible entity of the Transurban Holding Trust (which are not reporting entities under the Act), 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'.

For more information on the Transurban roads and projects managed by the Reporting Entities outlined above, see our [FY24 Corporate Report](#).

¹ Voluntary reporting entity



Appendix B

Program key tracking metrics

Tracking and Effectiveness Criteria

| | Area | Indicator description | FY24 | FY23 | FY22 | |
|--|---------------------------|---|--|---|---|--------------|
| Are we increasing the visibility of our business and supply chain? | Operations | Transurban Reporting Entities | 21 | 21 | 19 | |
| | | Transurban operating sites and office locations | 25 | 22 | 22 | |
| | | Operating countries | Australia, United States of America, Canada | Australia, United States of America, Canada | Australia, United States of America, Canada | |
| | | Direct workforce | 4100+ | 3900+ | 3600+ | |
| | | Full-time employees | 1900+ | 1750+ | Not reported | |
| | | Part-time employees | 115+ | Not reported | Not reported | |
| | Supply chain | Supply chain countries | 14 | 14 | 18 | |
| | | Supply chain managed spend | over \$1.75b+ | over \$1.8b+ | Over \$1.3b+ | |
| | | Tier 1 supplier count (direct) | 1500+ | 1600+ | 1600+ | |
| | | Tier 2 supplier count | 275+ identified | 150+ identified | Not reported | |
| | | Social enterprises and First Nations suppliers | 160+ | 100+ | Not reported | |
| | | New and alternate suppliers used in this period compared with previous period | ~380 | ~450 | ~500 | |
| | | Major categories of spend | 84% of total spend with Major projects, Operations and maintenance, Professional services and Technology | 84% of total spend with Major projects, Operations and maintenance, Professional services and Technology | 82% of total spend with Major projects, Operations and maintenance, Professional services and Technology | |
| | | Spend with Australian suppliers | 91% | 90% | 84% | |
| Are we understanding our risks? | Risk Assessment resources | Tools and materials used to inform our risk assessments | Global Slavery Index 2023 US TIP Report US Child and Forced Labour Report Human Rights materials Supplier Evaluations Internal expertise Desktop assessments Modern Slavery Register Industry groups, supplier engagement and pilot programs | Global Slavery Index 2018 US TIP Report US Child and Forced Labour Report Human Rights materials Supplier Evaluations Internal expertise Desktop assessments Modern Slavery Register Supply chain mapping pilot | Global Slavery Index 2018 US TIP Report US Child and Forced Labour Report Human Rights materials Internal expertise Desktop assessments Modern Slavery Register | |
| | | Operations | Entities with employees | 4 | 4 | 4 |
| | | | Operations risk assessment | Low | Low | Low |
| | | | Employees who are visa holders | 205 | 125 | 71 |
| | | | Employees where English is a second language | 21% | Not reported | Not reported |
| | | | Casual employees | 17 | 32 | 25 |
| | | | Employees under EBAs or awards | 4% | Not reported | Not reported |
| | Supply chain | Entities with supply chains | 44 | 41 | Not reported | |
| | | Spend with suppliers in countries where we operate | 99% | 99% | 99% | |
| | | High-risk spend categories | Cleaning (non-roadside) Promotional items Construction materials | Cleaning (non-roadside) Promotional items Construction materials | Cleaning (non-roadside) Promotional items Construction materials | |
| | | Additional priority spend categories | Physical security services PPE | Security services PPE | Not reported | |



Program key tracking metrics – continued

Tracking and Effectiveness

| Criteria | Area | Indicator description | FY24 | FY23 | FY22 | |
|--|---|--|--|---|-------------------------------------|--------------|
| Are we improving how we (and our suppliers) address our modern slavery risks through ongoing due diligence? | Policies | Operational policies | Human Rights Policy | Human Rights Policy | Human Rights Policy | |
| | | | Code of Conduct | Code of Conduct | Code of Conduct | |
| | | | Sustainability Policy | Sustainability Policy | Sustainability Policy | |
| | | | Employee Policy Handbook (US) | Employee Policy Handbook (US) | Employee Policy Handbook (US) | |
| | | | Whistleblower Policy | Whistleblower Policy | Whistleblower Policy | |
| | | | Anti Bribery, Corruption and Fraud Policy | Anti Bribery, Corruption and Fraud Policy | Ethical Business Practices Policy | |
| | | | Anti-Money Laundering Policy | Anti-Money Laundering Policy | Diversity & Inclusion Policy | |
| | | | Diversity & Inclusion Policy | Diversity & Inclusion Policy | Procurement Policy | |
| | | | Procurement Policy | Procurement Policy | | |
| | | | Contract Management Framework | Employee Policy Handbook (Quebec) | | |
| | Supply chain policies (some operational policies also apply to suppliers) | SSCoP | SSCoP | SSCoP | | |
| | | Supply Chain Remediation Guidelines | Supply Chain Remediation Guidelines | Supply Chain Remediation Guidelines | | |
| Due diligence | | Suppliers triaged through high-risk onboarding process | 32 | 3 | 3 | |
| | | Supplier due diligence evaluations completed (across 24mth cycle) | 200+ | 70 | 44 (third-party digital pilot tool) | |
| | | Priority supplier due diligence evaluations completed (across 24mth cycle) | 80 | 48 | Not reported | |
| | | Suppliers identified engaging migrant labour | 45 | 10 | Not reported | |
| | | Suppliers identified using labour hire | 53 | 19 | Not reported | |
| | | Assessed suppliers identified providing workers access to grievance mechanisms | 60% | 31% | Not reported | |
| | | | | | | |
| Are we doing our part to raise awareness of modern slavery by collaborating with suppliers and industry partners? | Mandatory learning - operations | Direct workforce modern slavery eLearning completion | 2066 | 1875 | Not reported | |
| | | Specialised training | Contract Management staff trained on modern slavery awareness within contracts | 100+ | 70+ | Not reported |
| | | Tailored TCRO, IRC and supplier staff training sessions | 5 | 3 | 2 | |
| Do potential or actual affected stakeholders have access to, and trust mechanisms to raise concerns and do they have access to remedy? | Grievances and remedy | Total Reportable conduct issues raised (all feedback mechanisms) | 13 | 2 | 7 | |
| | | Reportable conduct issues relating to modern slavery indicators ¹ | 0 | 0 | 0 | |
| | | Remediation provided | Not applicable | Not applicable | Not applicable | |

¹ International Labour Organisations descriptions of forced labour indicators



Appendix C

| Mandatory reporting criteria | Reference in this statement |
|--|--|
| Identify the reporting entity | <ul style="list-style-type: none"> • Contents – see page 3 • Appendix A – see page 30 |
| Describe the reporting entity's structure, operations and supply chains | <ul style="list-style-type: none"> • Our structure and operations – see page 6 • Our supply chain – see page 11 |
| 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"> • Modern slavery risks – see page 14 |
| 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"> • Our approach – see page 17 • Collaboration and industry engagement – see page 28 • Measuring effectiveness – see page 27 |
| 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"> • Measuring effectiveness – see page 27 |
| 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"> • Consultation – see page 29 • Approval – see page 29 |
| Include any other information that the reporting entity, or the entity giving the statement, considers relevant | <ul style="list-style-type: none"> • Our broader sustainability efforts – see page 5 • Collaboration and industry engagement – see page 28 |

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