



**MODERN SLAVERY
STATEMENT 2021**



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Acknowledgement of Country

Ventia would like to respectfully acknowledge the Traditional Owners and Custodians of country throughout Australia and their connection to land, sea and community. We pay our respects to them, their cultures and to their Elders past, present and emerging.



Mihi

He tautoko te ahurea i ngā kawa me ngā tikanga o ngā Iwi whānui o Aotearoa, me ka kawa me ka tikaka o ka Iwi whānui o Te Waipounamu. / We recognise and celebrate the culture of mana whenua in Aotearoa and Te Waipounamu where our teams respect local Iwi and communities across the country.

Modern Slavery

The serious exploitation of people through threats, coercion or deception which undermines or deprives them of their freedom¹.

Any form of modern slavery is simply unacceptable

At Ventia, we do not tolerate any form of modern slavery. Our approach to responding to modern slavery is informed by our values and commitment to working with our supply chains stakeholders to tackle human rights issues.

We continue to maintain and improve our systems and processes to prevent modern slavery within our diverse businesses and supply chains.

This modern slavery statement sets out our approach to managing modern slavery risk and the improvements we have made throughout 2021.

In 2021, Ventia did not identify any instances of modern slavery in our operations or supply chains.

We operate in accordance with all applicable laws as well as the Universal Declaration of Human Rights. Ventia also supports the United Nations Sustainable Development Goals, including its goal of Decent Work and Economic Growth.

We are committed to continuous improvement of our approach as our understanding and awareness of modern slavery risks develops over time.



David Moffatt
Chairman
Ventia

¹ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Introduction

Ventia Services Group Limited ACN 603 253 541 (**Ventia**) is an Australian public company listed on the ASX and NZX (as a foreign exempt issuer) with its registered office located at Level 8, 80 Pacific Highway, North Sydney, NSW 2060.

This Modern Slavery Statement (**Statement**) has been made pursuant to the Modern Slavery Act 2018 (Cth) (**Act**). The Statement sets out the actions Ventia has taken to assess and address modern slavery risks in our operations and supply chains during the year ended 31 December 2021.

This Statement was approved by the Ventia Board of Directors (**Board**) as the ultimate parent entity of the Ventia Group (**Group**) on 9 June 2022.

REPORTING ENTITIES

This is a joint Statement which applies to all Ventia reporting entities within the scope of the Act, as identified in Appendix 1 (collectively referred to in this Statement as "**Ventia**", "**we/our**").

ABOUT US

Ventia is an essential infrastructure services provider, which operates in Australia and New Zealand to deliver services to over 100 clients, with longstanding relationships in both the public and private sectors.

With over 15,000 employees and 20,000 subcontractors, working at more than 400 locations, we are a significant employer with extensive capabilities offering infrastructure maintenance services and other solutions across the full asset lifecycle.

We provide the following services

Asset Management
Digital Solutions
Engineering and Capital Works
Environmental Services
Facilities Management
Network Design and Build
Operations and Maintenance
Property and Consulting

And serve a range of industries

Commercial Property	Maritime
Defence	Mining and Minerals
Education	Oil and Gas
Energy and Electricity	Rail
Health	Road
Industrial	Social Housing
Justice	Telecommunications
Local Government	Water

Ventia is structured across four Sectors, each of which includes a number of business units, largely aligned with industry segments. Each Ventia Sector is supported by whole-of-Ventia group functions, including but not limited to Legal, Finance, Digital Services and People & Capability.

DEFENCE AND SOCIAL INFRASTRUCTURE



Defence and Social Infrastructure provides maintenance and support services to clients operating across Defence, Social infrastructure (Education, Social Housing, Justice and Health portfolios), Local Government and Critical Infrastructure. Ventia also provides property and consulting services to public and private clients.

INFRASTRUCTURE SERVICES



Infrastructure Services supports the ongoing maintenance of infrastructure including utility infrastructure (Water and Electricity & Gas) and Resources and Industrial assets (mine operation facilities, Oil and Gas processing facilities, gas wells and industrial facilities). Ventia also provides complex and large-scale environmental remediation services and leverages technologies aimed at enhancing client productivity.

TELECOMMUNICATIONS



Telecommunications provides an end-to-end service capability that spans design, supply, construction, installation, commissioning, and maintenance of telecommunications fixed and wireless networks and infrastructure.

TRANSPORT



Transport provides maintenance, project delivery and technology solutions to owners and operators of road, motorway, tunnel, and rail networks.

JOINT VENTURES

Where Ventia provide services through incorporated or unincorporated joint ventures (joint operations) these operations are managed by the respective Board or a management committee which include Ventia nominated representatives. Ventia also provides services such as finance and legal support to these operations. Ultimately Ventia only enters into joint ventures and operations with reputable and predominantly listed Business Partners who meet the requirements of Ventia's Business Partners Standard. These organisations have a similar modern slavery compliance obligations as Ventia.

OUR BUSINESS AT A GLANCE



Focused operations across
Australia and New Zealand



More than **35,000**
talented employees and subcontractors



400+
projects and contracts



More than 50 years
industry experience

We provide long-term operation, maintenance, and management of critical public and private assets and infrastructure across a diverse range of industries.

Our ownership structure

Ventia was created in 2015 following the merger of Leighton Contractors Services division, Thiess Services and Visionstream. These underlying businesses each have an operating history in Australia and New Zealand dating back more than 25 years. In July 2020, Ventia completed the purchase of the Broadspectrum group of companies in Australia and New Zealand, and Broadspectrum operations have since been fully integrated into Ventia.

In November 2021, Ventia listed on the Australian Securities Exchange (ASX) under the code VNT and New Zealand's exchange (the NZX, as a foreign exempt issuer).

Our values

Our purpose at Ventia is making infrastructure work for our communities. We recognise that every decision we make and action we take has an impact and can significantly affect the lives of those who live in, and depend upon, the communities in which we operate. As such, we put the safety and health of our people, our clients and our communities above all else. This is a fundamental guiding principle for everything we do.

At Ventia, we deliver on our purpose by bringing our values and behaviours to life. Ventia's values guide how we go about our business, the decisions that we make and the actions we take every day.

 <h2>INTEGRITY</h2> <p>Do what's right</p> <ul style="list-style-type: none">• We deliver what we say we will• We are open, straightforward and honest• We care for each other's wellbeing and safety• We treat everyone fairly and with respect	 <h2>COLLABORATION</h2> <p>Achieve more together</p> <ul style="list-style-type: none">• We work together to bring the best to our clients and communities• We understand our client's needs and add value to their business• We share resources to get things done• We listen, respect and respond to different points of view	 <h2>CHALLENGE</h2> <p>Drive to deliver</p> <ul style="list-style-type: none">• We understand what best looks like and we deliver this is to our clients• We hold each other to account and we manage consequences• We work with discipline and rigour• We are energetic and passionate about what we do• We have the courage to lead change	 <h2>INGENUITY</h2> <p>Create better ways</p> <ul style="list-style-type: none">• We innovate to the benefit of all our stakeholders (shareholders, clients, communities and employees)• We bring continuous improvement to our clients• We seek out and share knowledge and ideas
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Overview of Corporate Governance

At Ventia, we believe good governance is fundamental to achieving our purpose.

The Board is responsible for the overall governance of the Group and its controlled entities (**Group**). It sets the ‘tone from the top’ by demonstrating behaviours that are aligned with Ventia’s values. The diagram below illustrates Ventia’s corporate governance framework. It shows the relationship between the Board, its Committees, the Managing Director and Group CEO, and the Executive Leadership Team, and various independent assurance functions.

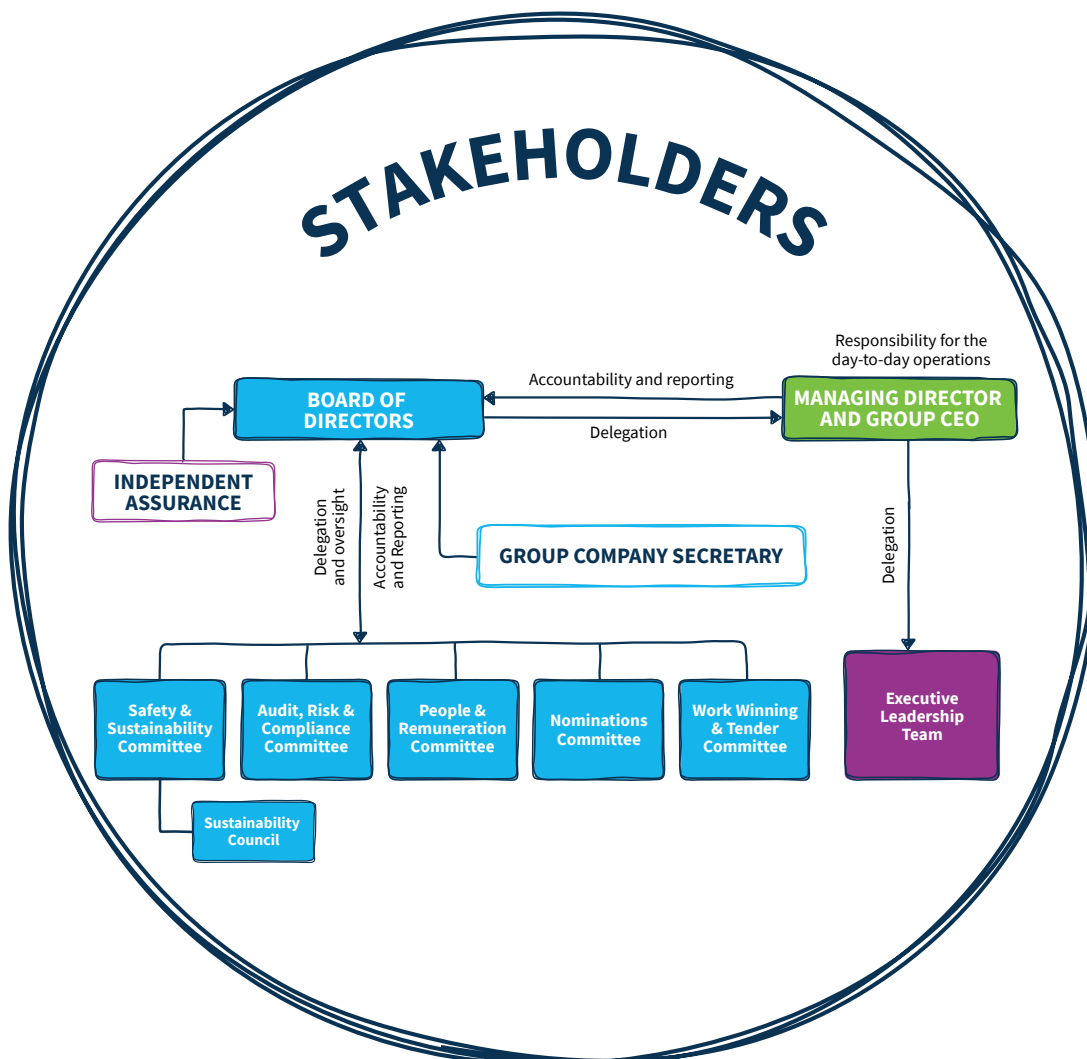
The Board has ultimate responsibility for overseeing Ventia’s response to modern slavery risks. The Board’s Audit, Risk and Compliance Committee oversees the review of emerging risks and the management of those risks, by applying risk management policies and processes to the relevant parts of our operations, underpinned by Ventia’s Risk Management Framework.

In April 2021, our Board established a Safety and Sustainability Committee. This Committee oversees Ventia’s approach to managing modern slavery risk.

Reporting into the Safety and Sustainability Committee, we have a Sustainability Council which has representation from across the business and champions the implementation of our policies and strategy, including the implementation of activities relating to modern slavery risk in Ventia’s operations and supply chains. The Council is supported by working parties, including a dedicated Good Governance Working Party which is focused on continuous improvement in Ventia’s approach to identifying and managing modern slavery risks.

For more information about Ventia’s corporate governance framework, practices and policies please refer to Ventia’s [2021 Corporate Governance Statement](#).

OUR CORPORATE GOVERNANCE FRAMEWORK



Policy framework

Underpinning our corporate governance framework are Ventia's policies and standards, several of which are relevant to managing modern slavery risk. This includes Ventia's Modern Slavery Policy, Business Partners Standard, International Trade Controls and Anti-money Laundering Policy, Whistleblower Protection Policy and Ventia's Code of Conduct, which are summarised below.

VENTIA'S CODE OF CONDUCT

Ventia's Code of Conduct (**Code**) sets out a clear and consistent standard of behaviour that is expected from all our employees and any third parties engaged by us, including our joint operations (joint ventures), contractors and suppliers. It provides a single reference point to ensure we work safely, behave ethically and abide by laws and regulations with every work decision, task and interaction.

Our Code guides what we value and how we work – with each other, as well as our clients, service providers, suppliers and the communities in which we operate. It strengthens our relationships, inspires confidence in what we do and how we do it, and protects Ventia and our reputation.

Contained within our Code are the conduct principles, covering our commitments, minimum standards of behaviour and responsibilities in detail. Each conduct principle is underpinned by key policies. The Code strictly emphasises Ventia's rejection of child and forced labour.

The Code is reviewed annually, along with all our policies. A copy of our Code is available on our [website](#).

EMPLOYEE TRAINING ON THE CODE

At the commencement of employment and annually thereafter, all Ventia employees are required to complete compulsory training on the Code. This training is a requirement stipulated by the Audit, Risk and Compliance Committee. The training program is updated annually to ensure any issues which have arisen since the last program are included and given appropriate emphasis.

THIRD-PARTY SUPPLIERS TO VENTIA

Ventia's standard supplier and subcontractor contracts (including labour hire companies) stipulate our requirement for those third parties to understand and comply with the Code. If a third party is found to have acted contrary to the Code, Ventia has a range of corrective actions available, from collaboration and remediation through to the legal capacity to terminate working with that third party.

MODERN SLAVERY POLICY

The Board of Directors first approved the Ventia Modern Slavery Policy in 2020 and it was updated in 2021. Ventia's updated [Policy](#) emphasises our commitment to implementing processes in our operations and supply chains that seek to mitigate the risk of any form of modern slavery including slavery, servitude, forced marriage, forced labour, deceptive recruiting, trafficking in persons and debt bondage from occurring.

We are also committed to working with our suppliers and contractors to eradicate modern slavery from our supply chains. In addition to complying with the Code, all suppliers and contractors are contractually required to comply with our Business Partners Standard and its associated due diligence process, and our International Trade Controls and Anti-money Laundering Policy.

Ventia's standard contract terms are designed to help mitigate modern slavery throughout Ventia's supplier base and require suppliers to warrant that modern slavery risks in their business are assessed, investigated and that such risks are addressed through appropriate due diligence and remediation programs.

Once onboarded, Ventia's suppliers are also required to notify Ventia of any confirmed instances of modern slavery in their operations, provide a credible remediation plan and take relevant action within a timeframe set by Ventia. Upon request, suppliers are required to permit Ventia's personnel or our nominated representative to undertake verification activities to validate supplier compliance, which may include accessing the supplier's premises and records as required by Ventia.

Ventia's suppliers must commit to the inclusion of a similar and relevant clause in all contracts they may enter into with any secondary subcontractors while under Ventia's operational control.

WHISTLEBLOWER PROTECTION POLICY

Consistent with Ventia's commitment to maintaining a culture of integrity, we uphold a Whistleblower Protection Policy. This Policy enables the protection of any parties reporting business concerns, including actual or suspected misconduct within Ventia and our operations. The Policy applies to Ventia's current and former employees, directors, contractors and suppliers, including employees of contractors and suppliers and any third-party participant in our supply chains.

Business concerns are reported either directly to our Group Compliance Officer, via the Ventia website or through an independent, anonymous and secure service delivered for Ventia by KPMG. Our Whistleblower Protection Policy and the avenues to report any business concerns are communicated to all employees to raise awareness of the Policy and explain its key features such as how to make a Whistleblower report and the protections available to Whistleblowers. It is also publicly available via our [website](#).

OTHER RELEVANT POLICIES

In addition to the above, we have various policies in place at Ventia to promote ethical and legal practices and behaviour in alignment with Ventia's values. These policies also are designed to protect the human rights of employees, contractors, Business Partners, suppliers, clients and the communities in which Ventia operates. These include the following:

- Disclosure Policy
- Securities Dealing Policy
- Bribery and Corruption Policy
- Bullying and Harassment Policy
- Diversity and Inclusion Policy
- EEO and Discrimination Policy
- Fair Treatment Policy
- Health and Safety Policy
- Privacy Policy
- Procurement Policy
- Sustainability Policy
- Workplace Behaviour Policy

We continuously review the effectiveness of our policies and processes to ensure they align with all legal and operational initiatives or obligations, including the requirements of the Act where applicable.



Our supply chains

The integration of operations and functions following the acquisition of Broadspectrum was completed by Ventia in 2021. Modern slavery compliance was given priority during this process.

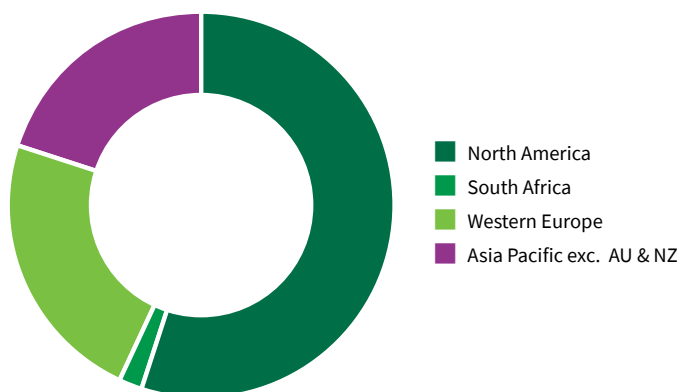
No Ventia entity manufactures goods and there has been no change to our operations in 2021 that would impact our supply chains. Ventia's ongoing operations continued to use goods and services supplied primarily through approved suppliers to create systems, provide services and other solutions, but at no time is Ventia an original equipment manufacturer. For example, while the outcome or end work of a project may be a solution, Ventia will only have provided services to support that outcome, such as the installation of products manufactured by our suppliers or those of our clients.

Ventia manages procurement through a Group, centre-led function, with local implementation. In 2021, our commitment to buy from local suppliers remained strong and we continued to source more than 80% of all goods and services from our directly engaged suppliers in Australia for use within Australia. This commitment enables us to work closely with our suppliers and understand their operations and the partnerships within their supply chains.

VENTIA SPEND BY REGION

Region	% of spend
Australia	84.9%
New Zealand	14.8%
North America	0.2%
Southern Africa	0.002%
Western Europe	0.1%
Asia Pacific excluding Australia and New Zealand	0.1%

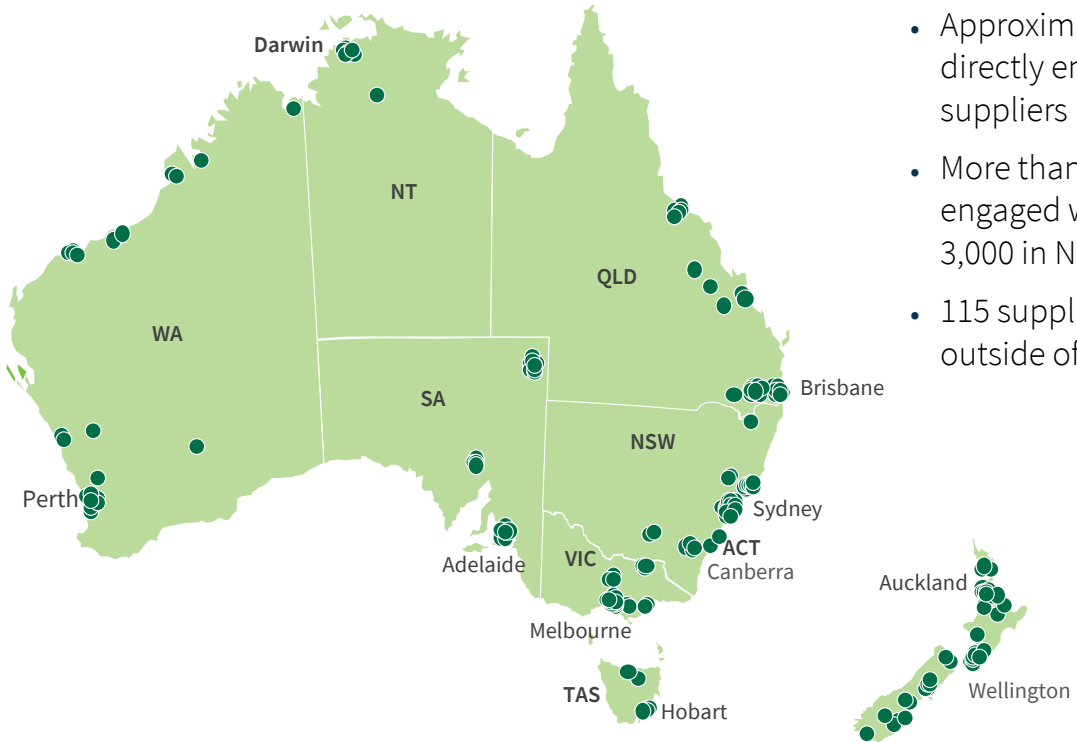
VENTIA SUPPLIERS LOCATED OUTSIDE OF AUSTRALIA AND NEW ZEALAND



While we continued to maintain good visibility of our directly engaged suppliers, we improved our understanding of our indirectly engaged suppliers in certain commodity groups within our supply chains through our membership with the Modern Slavery Coalition. This is and will be an important ongoing area of focus for Ventia, as we continue to identify key suppliers with which to develop partnerships and future engagement initiatives that support our drive to tackle modern slavery.

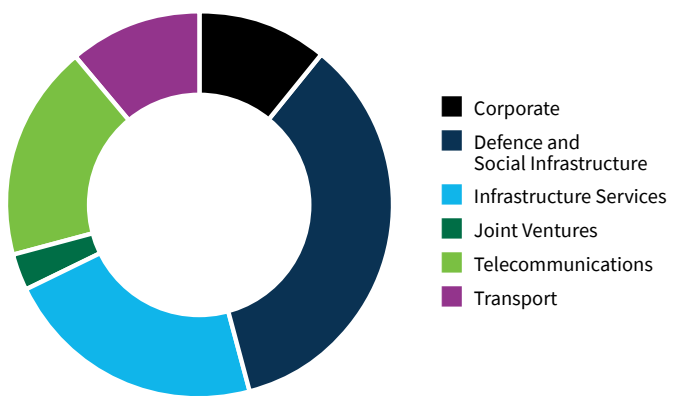
At times, individual projects do procure goods and services directly from local suppliers, should geographical circumstances require. For example, a Transport project in the Pilbara region of Western Australia may not be able to use a preferred Group supplier to meet all its requirements. Any regional suppliers must still follow Ventia's governance systems and procedures to ensure compliance with our Risk Management Framework. This aspect of our procurement approach remained consistent throughout 2021.

VENTIA'S OPERATIONAL FOOTPRINT



- Approximately 14,000 directly engaged suppliers (Tier 1)
- More than 10,000 engaged within Australia, 3,000 in New Zealand.
- 115 suppliers located outside of these regions.

SUPPLY CHAIN SPEND BY SECTOR 2021



OUR RISK MANAGEMENT APPROACH

Ventia's modern slavery risk assessment processes are an integral part of Ventia's Risk Management framework.

Suppliers are assessed for risk and alignment against our Code of Conduct and relevant policies through their responses to our Business Partners' Declaration and Business Partners' due diligence at onboarding and throughout the procurement lifecycle.

Our standard supply and subcontract agreements include obligations highlighting our management of modern slavery risks and associated legal and governance obligations.

As part of our specific forced labour Supply Chain Risk Evaluation, directly engaged suppliers were assessed using our risk assessment tool, which incorporates international validators (outlined below) together with sector and industry risks, product and services risks, geographic risks and entity risks. Ventia also included a review of the potential risks of COVID-19 on our supply chains.

INTERNATIONAL VALIDATORS

As part of the assessment of our supply chains for modern slavery risk, we continued to utilise 2018 Global Slavery Index (GSI) data. We used this data to benchmark our directly engaged international suppliers for both goods and services based on the supplier's main country of operation. The GSI provides a country by country ranking for 166 countries of the number of victims of modern slavery. It also provides an analysis of the actions taken by governments to respond, and the factors that make people vulnerable to modern slavery.

The United States Department of Labor 'List of Goods Produced by Child or Forced Labor' is a list of goods and their source countries, which it has reason to believe are produced by child labour or forced labour in violation of international standards, as required under the United States Trafficking Victims Protection Reauthorization Act (TVPRRA); the 'List of Goods Produced by Child Labor or Forced Labor' comprises 155 goods from 77 countries, as of September 30, 2020. Ventia has incorporated this data into the assessment of our international supply chains, not only based on country of operation but also on the type of goods procured. This practice continued at Ventia in 2021.

GEOGRAPHIC LOCATION OF PRODUCTS AND SERVICES

During 2021, we continued to use the geographic location of the production and provision of goods or services in our due diligence process to determine associated risk within the supplier workforce, such as low unionisation rates and remuneration.

IDENTIFICATION OF PRODUCT AND SERVICE RISKS

We prioritise the assessment of our suppliers' human rights performance based on risk. We have continued to identify suppliers with higher potential human rights risks. As a result, we have adopted a category-based approach to supplier risk management.

During 2021, we continued to only import directly a very small amount of the total product purchases from overseas suppliers. Most of these suppliers are based in OECD defined low-risk countries.

The risk analysis performed across the Ventia group found that human rights risks, including those linked to modern slavery, are more prominent in the supply of low-value product, for example protective vests and high visibility clothing. This product category has been a particular focus in the design of our supplier audit and engagement program.

We also assess suppliers' sustainability risks as part of the selection and contract renewal process to identify if equipment and clothing supplied to Ventia has been produced in a situation likely to involve modern slavery risks such as labour conditions.

Where suppliers are unable to satisfy Ventia that they have appropriate risk management controls in place, or if they are unwilling to share this information, we may take further action, such as engaging senior management, implementing a remediation plan, or suspending the supplier's contract.

Our top supplier categories for 2021, which constitutes 64% of Ventia's combined total spend continued to be:

1. Facilities management – 49% of total spend
2. Construction – 8% of total spend
3. Corporate services – 7% of total spend.

Asset Management services continued to be a significant supplier spend category during 2021 with over 6% of total spend. These services include a combination of management, financial, economic, engineering and other maintenance practices applied to infrastructure assets.

With more than 5% of total spend, Information Technology (IT) was also a prominent supplier category, comprising mostly technical services with a minor proportion of goods such as communications equipment and hardware.

It is important to note that the provision of services, as opposed to the supply of goods or materials, are the dominant trait of Ventia's suppliers within these categories.

Product and services risks were identified in the following categories with a potentially higher level risk of potential modern slavery:

- Personal Protective Equipment (PPE) and workwear
- promotional items
- cleaning services and equipment
- fresh fruit, vegetables and seafood, and
- technology services and equipment.

Suppliers identified in the above categories represent 7% of our total spend.

Based upon the location and services provided by these suppliers, the risk of modern slavery for these categories has been assessed as low to medium risk. A targeted group of these suppliers were identified to participate in a pilot program based on their responses to our initial modern slavery self-assessment questionnaire. The purpose of the program is to collaborate and enhance the supplier's knowledge and approach to modern slavery risk within their supply chains.

IMPACT OF COVID-19

New Zealand and each Australian state and territory in which Ventia operate were, at various times, in relatively different phases of the COVID-19 pandemic during the 2021 calendar year. Border closures in both Australia and New Zealand, as well as other workplace restrictions impacted our ability to undertake some planned activities intended to further understand modern slavery risks in our supply chains.

The [Ventia Annual Report 2021](#) sets out the overall impacts of the COVID-19 pandemic on our operations. Pages 36 and 100 of our Annual Report respectively outline these impacts to the safety, health and wellbeing of our workforce and the impact on our businesses.

There was an increase in cleaning services delivered by Ventia throughout 2021. This was a direct result of action being taken by our clients to limit the impact of COVID-19 and improve safety, health and wellbeing at their operations. We focused our pandemic response on increasing support of our workforce and protecting the welfare of workers through guidance emphasising personal sanitisation and social distancing measures, the management of leave arrangements and flexible working, and prioritising increased communication.

Our expectation is always that our suppliers comply with all government health advice and guidance and this was especially significant in the extraordinary circumstances of the global pandemic. We also have worked closely with our clients to consider the best ways to support our workforce and our subcontractors at our various projects and locations whilst continuing to deliver services in a manner that is in line with government and expert health advice.

OUTCOME

No instances of modern slavery were identified through the process outlined above that was undertaken during the period relevant to this Statement.

In addition, no high residual risks were identified during the reporting period. 244 suppliers were shortlisted for further engagement regarding modern slavery risks in 2021, spanning about AU \$140 million or 5.7% of the year's total spend.

Ongoing risk mitigation measures

Ventia has designed a modern slavery due diligence questionnaire, which is used when a new supplier is proposed to work with us.

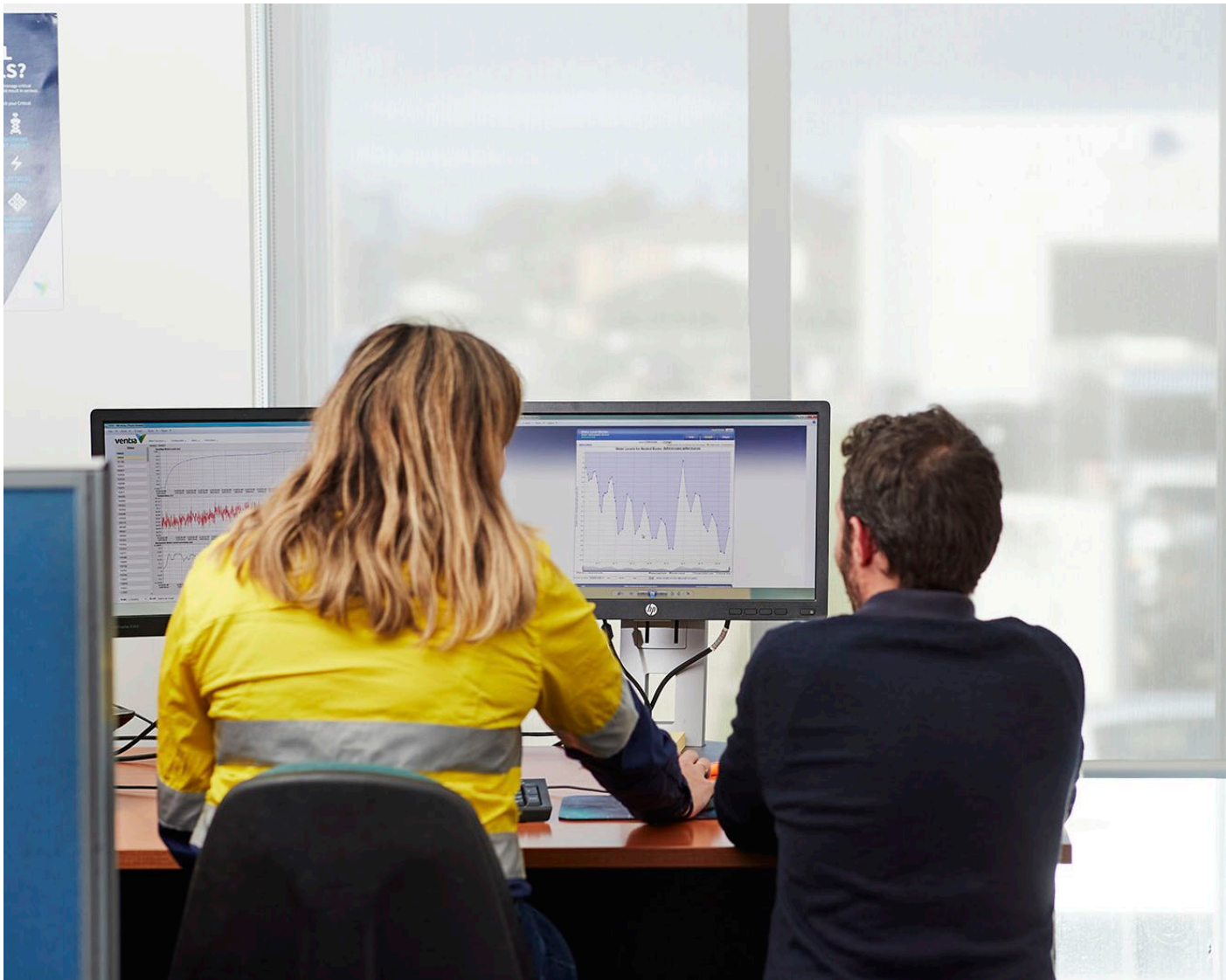
The modern slavery questionnaire is supplemented by our Business Partners due diligence. This requires all new suppliers to execute a due diligence questionnaire. In addition, a supplier must complete Business Partners due diligence annually if our spend with the supplier exceeded AU \$1 million in the previous calendar year.

All new suppliers are required to disclose their compliance with modern slavery laws and other relevant human right laws.

We consult with a range of stakeholders on an ongoing basis regarding our approach to the eradication of modern slavery including our subsidiaries, joint operations, clients, potential clients, suppliers, business units and employees. This process is documented within our modern slavery management plan.

Our approach to identifying and tackling human rights risks, including modern slavery risk in our supply chains, relies on collaboration. For example, we continue to collaborate as part of the Infrastructure Sustainability Council (ISC's) Road Sector Modern Slavery Coalition, which focuses attention on high priority commodities with significant inherent human rights risks of relevance to the road infrastructure sector such as Personal Protective Equipment (PPE) and bitumen.

Increased consultation with our suppliers has been implemented to assist in their understanding of modern slavery risks and ensure they understand our requirements. This increased engagement will be built upon each year to ensure all suppliers are kept up to date with any changes Ventia may require.



MEASUREMENT OF EFFECTIVENESS

We are committed to measuring the effectiveness of our risk mitigation actions. We measure the effectiveness of our modern slavery response based on:

- the quality of responses we receive from Business Partners about how they are managing modern slavery
- the number of reported incidents of modern slavery detected in our due diligence
- self-reporting from our Business Partners of identified or suspected modern slavery issues, and
- the quality of responses from our Business Partners when a suspected or actual modern slavery incident is identified.

In addition, as part of our commitment to continuous improvement, we also undertake an annual assessment to understand how Ventia can increase visibility of and manage the risk of modern slavery which may occur in our business and supply chains. This includes a focus on supplier relations and trends identified through grievance mechanisms.

ANNUAL ASSESSMENT PLAN PROGRESS

Role	Objectives	Measure of effectiveness	2021 Progress
As a purchaser of goods and services	Improve the quality of the modern slavery self-assessment questionnaire.	Percentage of suppliers completing the self-assessment.	A review of due diligence processes is proposed for 2022 to increase understanding of current processes and inform ongoing monitoring.
	Increase participation with industry.	Report on participation with industry groups and forums to demonstrate our commitment to improvements in assessing risk in our supply chains.	Engagement with the Infrastructure Sustainability Council Modern Slavery Coalition highlighted in Ventia’s Sustainability Report.
	Ongoing supply chains risk analysis.	Improve transparency of Tier 2 suppliers. Increase collaboration with suppliers identified with potential risk of modern slavery.	2021 focus has been on key commodity groups, particularly with tier 1 suppliers. Review of Ventia’s processes underway aims to identify opportunities to improve transparency of tier 2 suppliers.
As an employer	Provide training.	Code of Conduct training is mandatory and includes our approach to modern slavery.	Annual compulsory Code of Conduct training took place in the 4th quarter of 2021 with a c.85% completion rate (94% full time employees).
	Increase awareness of modern slavery risk mitigation and grievance mechanisms.	Collate data to support training attendance and online resources for all employees. Collect and report on data where grievance mechanisms is utilised.	First Responder training pilot has been developed to increase awareness on Motorways and Tunnels contracts. Ventia’s independent whistle-blower service was in place throughout 2021 to provide a professional and independent grievance process.
	Conduct independent audit of cleaning staff payroll compliance with modern awards.	Independent audit report highlights any issues of concern. Action plan implemented to address identified issues.	Two audits conducted. No material or systemic issues identified.



Case studies

ADDRESSING THE TREATMENT OF VULNERABLE WORKERS IN NEW ZEALAND

Ventia's Telecommunications Sector engages several subcontractors to install and maintain telecommunications assets in different regions including New Zealand.

Our subcontractors employ overseas workers from various regions including Africa, Asia and the Pacific Islands who require a suitable visa to live and work in New Zealand.

Overseas workers on visas are more vulnerable to abuses as found in the "[New Zealand 2019 Human Rights Report](#)" published by the United States Department of State. Consequently, Ventia instituted its worker welfare team in 2020 to engage and collaborate with our subcontractors and their employees to increase our visibility of their operations and employment practices, while providing our subcontractors employees with support such as confidential counselling.

Our worker welfare team deployed an awareness raising initiative to equip Ventia project supervisors with a tool kit to respond to concerns on the possibility that subcontractors provide Ventia with untruthful documentation such as workers statutory declarations,

aimed at hiding worker welfare concerns, with potential for the incidence of modern slavery. Our goal is to tackle tangible subcontractor risks such as the neglect of safety obligations.

Our worker welfare team conducted 338 subcontractor audits during 2021, with over 120 subcontracting staff provided with support to verify that rightful employee entitlements under the law had been received. A total of 11 comprehensive investigations were undertaken in collaboration with the New Zealand Labour Inspectorate to address identified at-risk subcontractor behaviour. Investigations resulted in five subcontractor terminations, while we continue to collaborate and monitor remaining at risk subcontractors. As a corrective action, a total of NZ \$115,000 was repaid by Ventia to subcontractor employees who were yet to receive their full entitlements under the law in full, while such amount was withheld from the offending subcontracting business.



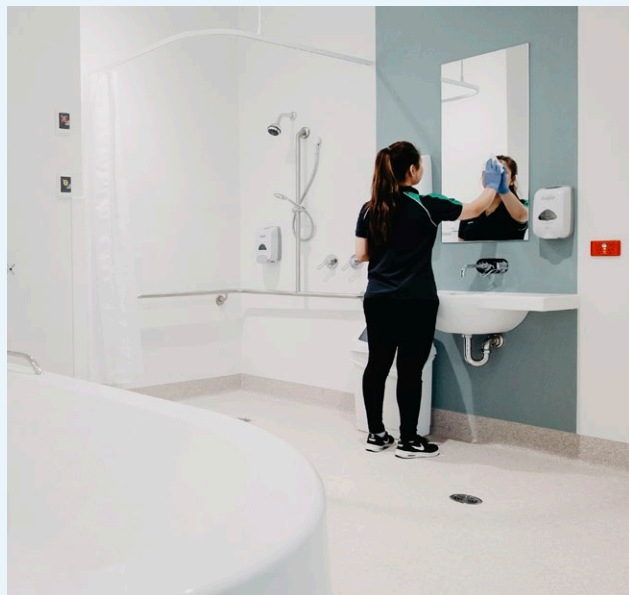
MANAGING VISA COMPLIANCE IN OUR AUSTRALIAN CLEANING BUSINESS

As an employer of more than 500 student visa holders, Ventia must adhere to specific compliance requirements to ensure the number of hours worked by a student visa holder does not exceed statutory limits. In 2021, managing this compliance was further complicated by the relaxation of maximum hours that could be worked, due to the need to bolster the Australian workforce during COVID-19. This meant that the hours worked by student visa holders had to be monitored by Ventia to ensure employees did not work excessive hours during periods where work-hour restrictions were lifted.

Further, as most student visa holders are engaged by Ventia as casual cleaners, risks inherent to the nature of this type of employment such as socioeconomic demographics and multiple workplaces, combined with the migrant worker status of the visa holders creates additional potential risk of human rights issues arising.

A comprehensive audit of compliance across all Ventia operations that employ visa holders was undertaken in 2021. The audit included personal contact being made with individuals to confirm their visa status. All visa holders were asked to confirm they were not subject to any duress or other conduct which would represent a breach of workplace or human rights laws or regulations, or a breach of Ventia's Code of Conduct. At the end of the audit all records were checked for completeness and updated where necessary. Emphasis was placed on ensuring records provided by student visa holders included up to date information of the progress of their studies.

An ongoing audit process was designed to monitor visa compliance in the future, with an emphasis on ensuring any changes to visa status and hours worked are closely monitored across all visa holders employed by Ventia. Comprehensive training was also provided to Ventia's employees involved in the management of visa holders covering all aspects of visa holder management including accurate monitoring of hours worked in line with current requirements and receiving updates on student's study progress.



TRAINING PILOT FOR MOTORWAY FIRST RESPONDERS

As part of our sustainability collaboration, Ventia has provided extensive support to Transurban on the delivery of modern slavery training to equip incident response staff from both organisations to identify and respond to a potential human trafficking incident.

The training aims to raise awareness of how modern slavery incidents may manifest in the motorway setting and provides standard procedures for internal escalation and to report credible concerns to the authorities.

A first training pilot was conducted virtually in June 2021 at the Cross City Tunnel in Sydney, with participation from relevant asset management teams from both organisations. Face to face training to incident response and control room crews was postponed due to COVID disruptions and is expected to be delivered in 2022.

Appendix 1 – Reporting entities

Entity Name

Ventia Services Group Limited

Ventia Asset Infrastructure Services Pty Ltd

Ten Rivers Pty Ltd

Ventia Utility Services Pty Limited

Silcar Pty Ltd

Delron Cleaning Pty Limited

Visionstream Pty Limited

Visionstream Australia Pty Ltd

Ventia Pty Limited

Ventia Australia Pty Ltd

Easternwell Group Assets Pty Ltd

Easternwell Group Investments Pty Limited

Easternwell Group Operations Pty Ltd

Easternwell Group Pty Ltd

Easternwell WA Pty Ltd

Piver Pty Ltd

ICD (Asia Pacific) Pty Limited

Trace Joint Venture

Note:

In third quarter of 2021, Ventia finalised our acquisition of Kordia Solutions Pty Ltd (Kordia Solutions Australia) and the integration of Kordia Solutions Australia business operations into the Ventia Group has commenced. Kordia Solutions Pty Ltd will become a reporting entity under the new name, Ventia Solutions Pty Ltd in the 2022 Modern Slavery Statement.

