

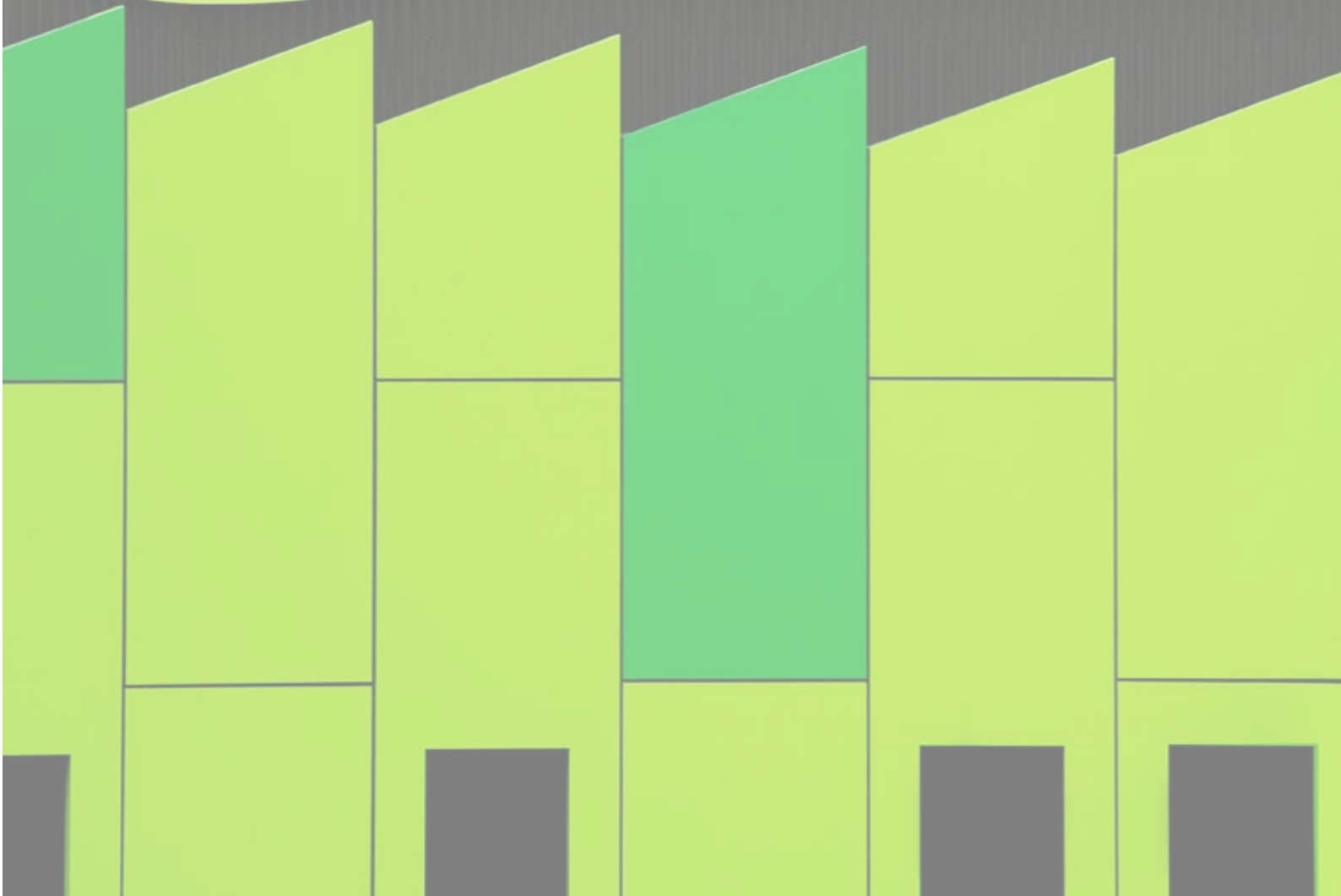
# **Modern Slavery Statement**

**(For the period 1 July 2022 to 30 June 2023)**

**ConnectEast Pty Ltd**



# **EastLink**



## PART 1: THE REPORTING ENTITY – CONNECTEAST PTY LTD

ConnectEast Pty Limited ACN 101 213 263 (**ConnectEast**, including references to ‘we’, ‘our’ and ‘us’) is a proprietary limited company registered in Victoria, Australia. This is ConnectEast’s fourth Modern Slavery Statement (**Statement**), covering the Australian financial year from 1 July 2022 to 30 June 2023 (**Reporting Period**) and published in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**).

ConnectEast is the responsible road authority and operator of EastLink until 2043 pursuant to the *EastLink Project Act 2004* (Vic) and a concession from the State of Victoria. EastLink is a 39km north-south tolled freeway in Melbourne’s east.

At ConnectEast, we understand that modern slavery is a global issue that may present itself in our operations and/or supply chains. ConnectEast remains committed to taking continued action to assess, address and mitigate modern slavery risks.

This Statement describes ConnectEast’s structures, protocols, and steps taken during the Reporting Period to assess and address the modern slavery risk to ConnectEast’s operations and/or supply chains, as well as an overview of future actions we plan to take.

In the process of preparing this Statement, ConnectEast’s Senior Management Team and Board of Directors have reviewed and provided feedback on its content. This Statement was approved by ConnectEast’s Board on 21 November 2023.

Signed:



Russell Caplan  
Chairman  
ConnectEast Pty Ltd



Charles Griplas  
Director  
ConnectEast Pty Ltd



## PART 2: CONNECTEAST'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Structure

ConnectEast is a private company registered in Victoria, Australia. It holds the concession from the State of Victoria to finance, design and construct the Eastlink motorway in the east of Melbourne, and to operate and maintain it as a toll road until November 2043. ConnectEast is entitled to charge and collect tolling revenue from users of EastLink.

ConnectEast's sole asset is EastLink and it does not own nor control any other entities.

ConnectEast is a "reporting entity" for the purposes of the Act.

### Operations

ConnectEast's core operations are located principally in the east of Melbourne with ConnectEast's head office, the EastLink Operations Centre (**ELOC**), at 2 Hillcrest Avenue, Ringwood, Victoria in Australia.

ConnectEast has approximately 162 employees, all of whom are principally based at ELOC.

The core business of ConnectEast is the operation and maintenance of EastLink, which includes the following:

- operation, maintenance and repair of EastLink and associated land;
- environment and land management;
- emergency and incident management;
- public use conditions including signage and cameras;
- tolling and customer service; and
- financial and corporate support functions.

The core business departments which support the operations are:

- (a) Road Operations and Maintenance;
- (b) Information Technology (**IT**);
- (c) Customer Services;
- (d) Finance, Billing and Credit;
- (e) Legal and Regulatory;
- (f) HR, Risk and Safety; and
- (g) Corporate Affairs and Marketing.

ConnectEast engages Ventia Australia Pty Ltd (**Ventia**) to undertake certain operation and maintenance activities on ConnectEast's behalf, pursuant to an Operation and Maintenance Agreement. Ventia is a separate "reporting entity" under the Act.

### Supply Chains

ConnectEast engages a broad range of suppliers for the provision of products and services to support the operation and maintenance of EastLink and our business operations. ConnectEast's operations are solely based in Australia, and the majority of our direct suppliers are also based in Australia. Nevertheless, some of our direct suppliers have operations, or engage subcontractors, in countries that operate under different labour and human rights laws.

Our main procurement categories (with examples identified across our operations) include:

- (a) professional services (e.g., engineering and consulting services, revenue collection and debt recovery services, and professional advisors);
- (b) information and communications technology (e.g., software and hardware to operate EastLink, tolling and customer relationship management, IT support and telecommunication services);



- (c) maintenance, repair and operating (e.g., sourcing and procurement of raw materials and finished goods, plant, equipment, products and utilities such as power, fuel, water, drainage, waste collection and recycling to maintain EastLink);
- (d) business and administrative operations (e.g., products provided to customers such as account statements and notifications, tolling tags and tag holders); and
- (e) other services relevant to the maintenance and operation of EastLink.

## PART 3: ASSESSING RISKS OF MODERN SLAVERY PRACTICES

### Risks in our operations

ConnectEast's employees only work in Australia and primarily work in professional services. Our employment process is regulated by Australian laws, including the *Fair Work Act 2009* (Cth) and applicable awards. We consider there to be a low risk of modern slavery within our operations.

### Risks in our supply chains

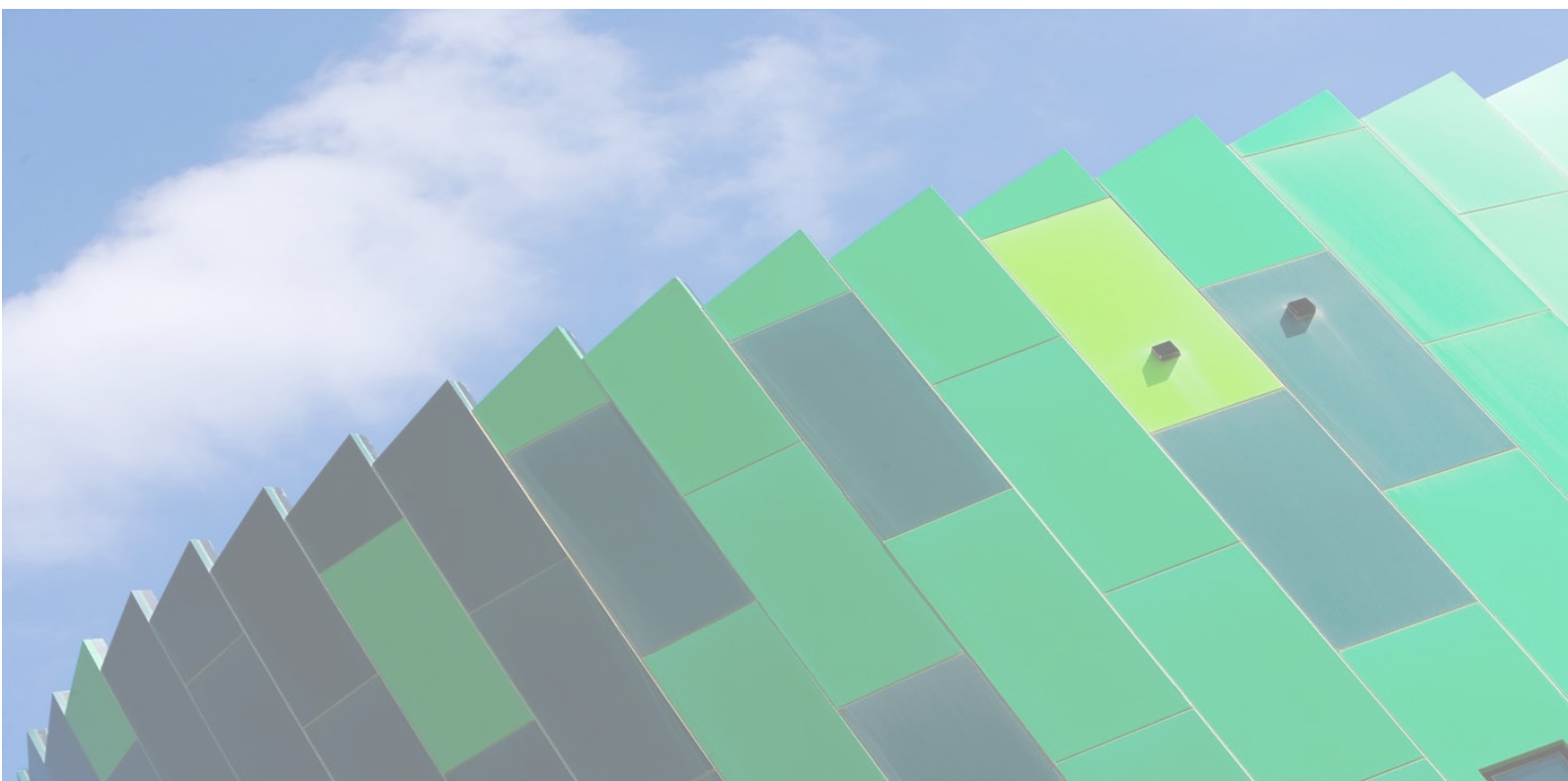
Whilst ConnectEast has a zero-tolerance policy of modern slavery, we appreciate that risks of modern slavery practices continue to exist, particularly downstream in our supply chain where we have limited visibility or leverage.

During the Reporting Period, each department at ConnectEast conducted an annual risk-based scoping exercise and assessment of existing suppliers, considering the risk of modern slavery in the operations of the suppliers based on the type of services provided, the business area, sector risk and geographic location.

Given the fixed nature of EastLink and the operate-and-maintain phase of the asset's life cycle, most of our contracted suppliers and their workforce composition are located in Australia, which has been assessed by the Global Slavery Index (**GSI**) as having a lower prevalence of modern slavery practices.

Nevertheless, there were moderate modern slavery risks where supply was procured from or outsourced to:

- (a) nations where human rights (and labour rights) are less respected or legislatively entrenched;
- (b) sectors with a historically higher exposure to modern slavery risks such as, as relevant to ConnectEast, cleaning and security services, or the manufacture of information and communications technology (**ICT**) equipment; or
- (c) geographies that have been assessed by the GSI as having a higher prevalence of modern slavery practices.



## **PART 4: ACTIONS TAKEN TO ADDRESS RISKS OF MODERN SLAVERY PRACTICES**

During the Reporting Period, ConnectEast employed various means to address potential risks of modern slavery throughout its supply chain and business operations.

### **Due diligence and supplier engagement**

ConnectEast ensures that its suppliers understand our expectations and proactively works with suppliers to address any modern slavery risks.

If any modern slavery risks were identified in the risk assessment (see Part 3), the relevant departments undertook further steps to better assess and mitigate such risks, by:

- obtaining and reviewing those suppliers' modern slavery statements and/or codes of conduct; or
- engaging with the supplier directly to understand the level of risk, having regard to any policies of the supplier to avoid modern slavery.

### **Training and awareness raising**

During the Reporting Period, ConnectEast provided annual modern slavery training to all employees (**Modern Slavery Training**), to train employees to identify key modern slavery risks in the business operations and supply chains.

Modern Slavery Training is mandatory for all employees each financial year, and it has also been incorporated in the training induction for new employees.

This ensures that all employees are aware of modern slavery risks and can identify possible risks at the time of procurement.

### **Contractual clauses**

ConnectEast incorporates modern slavery clauses in contracts entered into with new suppliers as well as any contracts that are due for renewal or extension.

### **Internal policies and controls**

ConnectEast has several policies in place that are relevant to modern slavery and human rights, including its ESG Policy and Whistleblower Policy. These policies provide a foundation for best practice within the business, and describe ConnectEast's clear expectations and standards pertaining to human rights, sustainability and modern slavery issues.

## **PART 5: HOW CONNECTEAST ASSESSES THE EFFECTIVENESS OF ACTIONS TAKEN**

To evaluate the effectiveness of our actions to address the risks of modern slavery practices for this Reporting Period, the following measures were implemented:

- (a) tracking of employee completion of the mandatory Modern Slavery Training;
- (b) monitoring the number and outcomes of the desktop risk assessment of ConnectEast suppliers;
- (c) tracking any actions undertaken by us or the supplier to mitigate any identified medium to high risks from the desktop risk assessment; and
- (d) keeping records of further information or policies provided by suppliers and requested by us during the risk assessing or mitigation phase.

Further qualitative measures will continue to be assessed and introduced over the course of future reporting periods.

## **PART 6: PROCESS OF CONSULTATION WITH OWNED OR CONTROLLED ENTITIES**

ConnectEast does not own nor control any other entities.

## **PART 7: ADDITIONAL RELEVANT INFORMATION**

ConnectEast is actively monitoring the ongoing statutory review of the Act, including the recommendations in the report published by the Australian government on 24 May 2023. Should any further developments occur during the next reporting period, including any proposed amendments to the Act, ConnectEast will take the necessary steps to ensure it continues to comply with its obligations under the Act.

