

# MODERN SLAVERY STATEMENT

Financial Year 2020-21

**THINK**

**LIKE A**

**PASSENGER**



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## ACKNOWLEDGEMENT OF COUNTRY

Keolis Downer acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work.



# A message from the CEO



**Keolis Downer is committed to operating responsibly and establishing and adhering to high ethical and social standards. We reject any activities which may cause or contribute to modern slavery, including forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage or deceptive recruiting for labour or services.**

Keolis Downer welcomes the opportunity to release our Modern Slavery Statement which outlines our approach to address and minimise the risk of modern slavery in our business operations and supply chains. Keolis Downer's Guide for Ethical Conduct, part of the Keolis compliance program titled "Konformite" which is supported by extensive policies, procedures and processes, is being put in place to help minimise this risk. This is further underpinned by a robust governance process and Keolis Downer's business integrity policies.

Ensuring that modern slavery is not taking place in Keolis Downer's workforce, which includes our supply chain beyond our direct suppliers, is challenging given the diversity of our service offerings and locations. Taking this into account, Keolis Downer will take a risk-based approach and is committed to continuously improving our processes. This includes engaging with our direct suppliers to educate, assess and encourage improvement in their own capacity to manage modern slavery risks within their broader supply chains.

We will continue to collaborate with our internal and external stakeholders over the coming years to address our own modern slavery risks and build on our commitment to combat modern slavery in our supply chain.

**David Franks**

Keolis Downer Chief Executive Officer

# Introduction

**The Modern Slavery Act 2018 (Cth) defines modern slavery as the most serious form of exploitation including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services; and the worst forms of child labour.**

Keolis Downer respects universal human rights and will work to identify and manage the risks of modern slavery in its own operations and in its supply chain. We provide a healthy, safe and sustainable workplace underpinned by the Keolis Downer Zero Harm Policy and will not tolerate any instances of modern slavery. The Keolis Downer Board stands against modern slavery in all its forms and expects that all our employees, suppliers, contractors, stakeholders and other business partners share this view.

This Modern Slavery Statement reflects our intention to conduct uniform and evidence-based remediation. The Statement should be read as a roadmap of initial steps to achieve the end goal of identifying, reporting and combatting any modern slavery within our supply chain.

In addition to meeting the specific legal reporting requirements under the Act, this Statement sets out Keolis Downer's methodology, key findings and planned framework for future action with regards to modern slavery risk identification and remediation in accordance with upcoming reporting periods.



## REPORTING ENTITY

Keolis Downer Pty Ltd ACN 165 343 680 is the ultimate holding company of all group subsidiary entities and a reporting entity for purposes of this Modern Slavery Statement.

The shareholders of Keolis Downer are wholly owned subsidiaries of Group Keolis S.A. Keolis Group (51% shareholding) and Downer EDI Limited Downer Group (49% shareholding). Downer Group (which includes Rail Services Victoria Pty Ltd, a direct shareholder of Keolis Downer) is a reporting entity and has prepared a Modern Slavery Statement for this and the last reporting period.

The following Keolis Downer Group wholly owned operating subsidiary entities are also reporting entities for purposes of the Act and together with Keolis Downer have prepared this joint statement:

- KDR Victoria Pty Ltd ACN 136 066 074
- Keolis Downer Bus and Coachlines Pty Ltd ACN 604 655 834
- Keolis Downer Adelaide Pty Ltd ACN 644 359 473

This statement has been prepared and submitted on behalf of Keolis Downer Pty Ltd and the above entities in respect of the operations of the Keolis Downer Group. Other group entities covered by this Statement are listed in the Appendix<sup>1</sup>.



# Our operations

**Keolis Downer is a leading operator and integrator of public transport in Australia. With over 5,000 employees and a presence in five states, Keolis Downer enables 350 million passenger journeys per year.**

We operate and maintain the largest tram network in the world in Melbourne (Yarra Trams), the light rail network on the Gold Coast (G:link), the Adelaide Metro train services and more than 1,300+ buses in New South Wales, Western Australia, South Australia and Queensland.

Established in 2009, Keolis Downer is a joint venture between Keolis, a leading public transport operator established in 16 countries, and Downer, the leading provider of integrated services in Australia and New Zealand.

## Our businesses across Australia





# Keolis Downer snapshot

## MELBOURNE LIGHT RAIL - YARRA TRAMS

Yarra Trams is the world's largest tram network proudly operated by Keolis Downer and delivers more than 200 million passenger trips each year.

- 475+ trams
- 2,000+ employees
- 5,000 services a day



## GOLD COAST LIGHT RAIL - G:LINK

- 18 trams
- 200+ employees
- 845,000+ passengers every month

## ADELAIDE METRO RAIL SERVICES

- 70 diesel and 22 electric trains
- 6 lines
- 89 stations
- Over 500+ employees
- 15 million passenger trips per year





## NEWCASTLE MULTI MODAL NETWORK

First multi-modal public transport contract to be delegated to a private operator in Australia. It includes buses, ferries and light rail.

- Over 180+ buses
- 2 Ferries
- 6 light rail vehicles
- 5 On Demand Vehicles
- Over 440+ employees



## BUS OPERATIONS ACROSS AUSTRALIA

### NEW SOUTH WALES - Northern Beaches & Lower

**North Shore:** 800+ employees, 402+ vehicles, 31 million+ passenger trips per year, 12 On Demand Vehicles

**WESTERN AUSTRALIA- Pathtransit:** 700+ employees, 15 million vehicle km/per year, 400+ vehicles, 8 million passenger journeys per year

**SOUTH AUSTRALIA - Southlink & LinkSA:** 260+ vehicles, 3,600+ weekly services, over 3.5 million passenger journeys per year and 6 On Demand Vehicles

**QUEENSLAND - Hornibrook Buslines:** 115+employees, 64+ vehicles, Over 1.7million passenger journeys per year, 3.6 million+ vehicle km/per year.



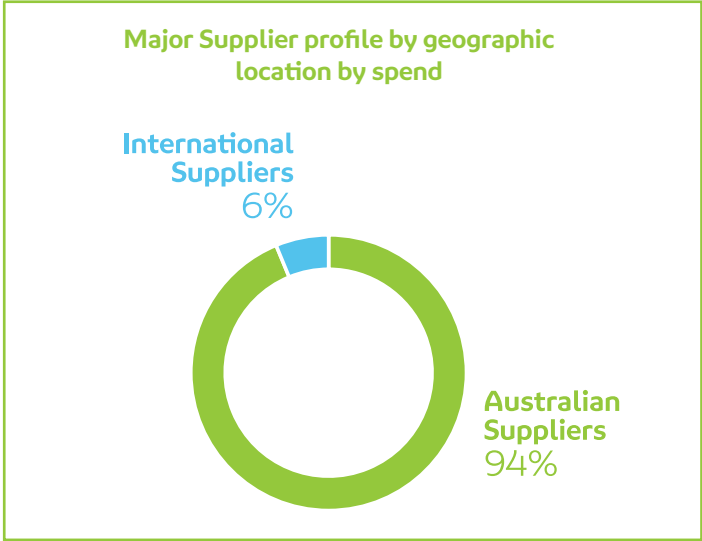


# Our supply chain

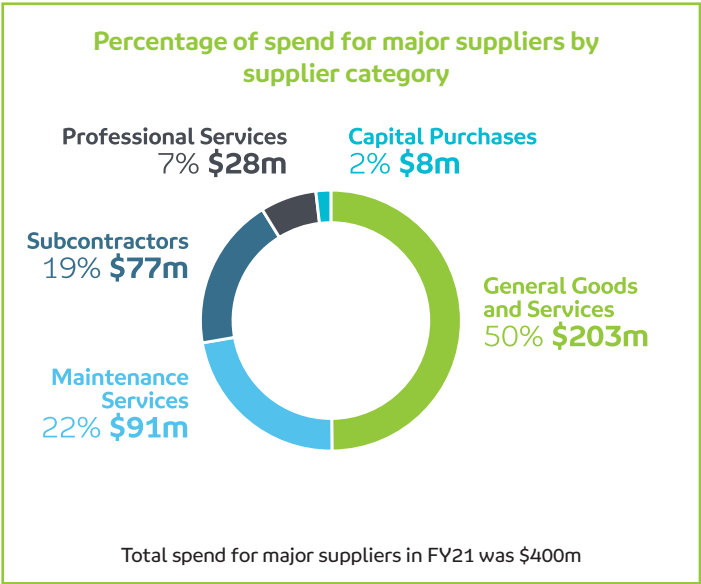
Keolis Downer engages with a diverse network of suppliers. Our partners range from large established businesses to smaller local business. Keolis Downer's supply chain can be broadly classified across 5 categories:

- **General Goods and Services:** Purchases for operations including fuel, spare parts, uniforms, IT services and other items.
- **Maintenance Services:** Maintenance works and services on vehicles and property.
- **Subcontractors:** Contractors hired by Keolis Downer to perform services such as consulting and other operational activities.
- **Professional Services:** Supporting functions for business which can include legal, financial and accounting advisory in addition to other technical services.
- **Capital Purchases:** Purchase of assets such as fleet vehicles, land and buildings.

The major suppliers used by Keolis Downer are essentially Australian for 94%, which reflects our priority in supporting local Australian businesses.



Level of risk based on data from The Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.



Location and risk of major suppliers – in order of spend

Country	Spend	Risk Level
Australia	\$382m	Low
Germany	\$13m	Low
Austria	\$5m	Low
Czech Republic	\$3m	Low
China	\$3m	High
USA	>\$1m	Medium
New Zealand	>\$1m	Low
Switzerland	\$1m	Low



# Risk of modern slavery practices in operations and supply chain

**Keolis Downer conducted a review of suppliers to identify instances and risk factors of modern slavery. While no instances of modern slavery were identified, we have identified some potential risk areas that will require further investigation and more rigorous controls.**

## Operational risk

We considered operational risk within Keolis Downer to be inherently low due to its geographical location. Keolis Downer's 5000 employees are primarily based in Australia, are employed under Australian laws and regulations and are largely subject to union oversight.

## Supply chain risk

General goods and services comprise the largest category of procurement within the supply chain. Keolis Downer also considers this category more at risk than other categories although mitigated by service based procurement being largely in-house and outsourced services will be monitored through induction of staff. Procurement relating to employee uniforms, cleaning and IT services were classified as potential risk areas. Keolis Downer is committed to further review and investigate the suppliers within this category and will proactively work towards gaining assurances from those suppliers that they are committed to mitigating modern slavery risks in their supply chain.

Services procured relating to maintenance, subcontractor and professional services were exclusively performed within Australia, the majority of which were performed by qualified professionals. This category was considered low risk.

Capital purchases were made almost exclusively from Australian based companies. Keolis Downer is cognisant that materials and/or additional labour used within the manufacture of these capital items may have been sourced from overseas.

Geographically, using The Global Slavery Index<sup>2</sup> (2018) and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor<sup>3</sup>, we have classified the location of most of our suppliers as low risk. We have only considered China as high risk and the United States as medium risk countries. Due to the low number of international suppliers, Keolis Downer can work closely with and monitor each supplier to minimise the risks associated with modern slavery.

While Keolis Downer has assessed its overall modern slavery risk to be low, the covert nature of modern slavery means we need to remain vigilant.

## Impact of COVID-19

The COVID-19 pandemic has resulted in a sharpened focus on business resilience. As a supplier of an essential service, Keolis Downer has continued to operate its passenger transport services throughout Australia during the pandemic despite the impact on patronage numbers.

We have encountered some ongoing workforce mobility issues as a result of various State-imposed lockdowns and restrictions based on government health advice.

In specific response to the pandemic, specific operating plans have been implemented by each of the entities. These focus on the safety and health of our workers, how to minimise operational disruption and optimise business viability during the pandemic.

Keolis Downer's mitigation plans allowed front line staff who were considered as essential to continue to provide services throughout. Keolis Downer's office-based employees were able to transition to remote working arrangements at the start of the pandemic.

There has been an increase in COVID related cleaning activities due to the pandemic which we have previously identified as an area to monitor.

While there has been some impact from COVID-19 and related lockdowns, there has been generally minimal delay in supply chain sourcing as Keolis Downer essentially relies on low risk-local suppliers. Potential delays and increased cost associated with some overseas supply is recognised as an area that needs to be monitored.





# Actions to assess and address the risk of modern slavery

**P**rior to the formation of the Keolis Downer modern slavery working group, some Keolis Downer Group operating entities undertook actions during or relating to the reporting period including:

- modern slavery was included in the Enterprise Risk Register for further assessment;
- the requirement to develop a group level Modern Slavery Statement being added to the Sustainability Strategic Plan;
- the use of the Avetta supplier management system which included supplier enquiry sections dealing with Modern Slavery; and
- the questioning of tenderers through procurement activities in relation to how suppliers are complying with the modern slavery obligations.

## Review of operations and supply chains

An initial assessment of major suppliers relating to the 2020-21 financial year has been conducted to identify potential operations and supply chain modern slavery risks. The results have been outlined in an earlier section of this Statement.

Keolis Downer is committed to enhancing our processes to assess and address potential modern slavery risks within our businesses at both a corporate and operating entity level, wherever possible. Due to the insidious nature of modern slavery, the reduction of modern slavery risk in our supply chain is a long-term goal. Keolis Downer will take a risk-based approach and refine our governance arrangements, policies and procedures and supply chain documentation to improve our position as an organisation that opposes modern slavery in all its forms.

## Policies and procedures

The policies and procedures set out in the Keolis Konformite program to be implemented across the Keolis Downer operating entities include the Guide for Ethical Conduct and the Keolis Supplier Relations Charter. This Charter strictly prohibits suppliers and their extended "value creation chain" from use of child labour, forced or compulsory labour in any form, servitude, trafficking, slavery or the detention of migrants or clandestine workers. The Charter places requirements on all suppliers to ensure that all work must be done voluntarily, in exchange for legal compensation, and not exposed to threats or actual criminal sanctions or criminal prosecution, violence, detention, retention of identity documents or confiscation of legal rights or privileges. In addition, workers must be free to consent to accept employment and resign in accordance with applicable laws and regulations and collective agreements

Keolis Downer will continue to update our procurement policies to include modern slavery actions in line with the requirements of the "Konformite" program.

These policies and standards will be enhanced to establish an ethical culture and environment which will not tolerate human slavery or abuse to enter Keolis Downer's operations or supply chain.



# Assessment and effectiveness of our actions

**Keolis Downer recognises the importance of monitoring how effective our anti- modern slavery policies and procedures are, and we will actively take steps to review our approach to assessing and addressing modern slavery risks.**

Keolis Downer's Modern Slavery working group meets regularly to discuss actions taken and their effectiveness in relation to modern slavery risks. Procurement and contract management staff will be trained to identify and act upon risk in day-to-day operations.

Keolis Downer will measure any impact of its policies or actions to address modern slavery risks or identify its potential or perceived level of risk against an agreed framework. The following table summarises Keolis Downer's measuring effectiveness framework:

Category	Nature of involvement	Approach for remediation
<b>Suspected</b>	Keolis Downer suspect a risk or harm which it has not caused or contributed but there is still a link via a business relationship. The link may be beyond the first tier of business relationships.	Investigate further and use leverage to mitigate the suspected risk or impact continuing or recurring to the greatest extent possible.
<b>Linked</b>	Keolis Downer identifies a risk which has incentivised or facilitated the harm, alongside another entity or through another entity. The contribution must make the harm more likely and not be trivial.	Use leverage to mitigate the risk that any impact continues or recurs. Play a direct role in remediation of the harm and report if actual harm is identified.
<b>Actual</b>	Actual harm in Keolis Downer's operations or supply chain.	Use all available measures to immediately cease or prevent the action/omission causing the harm and report to appropriate authorities.

Specific actions Keolis Downer intends to undertake in response to the risks of modern slavery which have been assessed to be most effective in the short term include:

- awareness and commitment at senior management and executive level of each of the Keolis Downer operating entities;
- training of employees, especially those working in procurement, to identify risks of modern slavery and the appropriate reporting processes if such risks are identified;

- reporting any criminal activity raised by employee/ whistleblower complaints to the appropriate law enforcement; and
- collaborate with multi-stakeholder initiatives to develop responses to modern slavery.



# Consultation with other entities

**The Keolis Downer Modern Slavery Statement is a result of consultation and collaboration between Keolis Downer operating entities and Keolis Downer shareholder groups. All Keolis Downer Group entities will adhere to the same organisation-wide policies and procedures including the Modern Slavery Policy.**

Keolis Downer has established a modern slavery working group comprised of members of the operations, finance, legal, procurement and communications departments from the Group's operating entities.

This working group will continue to monitor modern slavery risks. The purpose of this is to increase awareness and understanding of the risks and find solutions as to how Keolis Downer and each of the operating entities will monitor and address the risks of modern slavery entering our operations and/or underlying supply chain.





# Next steps

**Keolis Downer is in the early stages of a progressive risk-based journey to combat modern slavery within our operations and supply chain. This will require us to provide training to our employees and also engage with our suppliers to educate, assess and encourage improvement in their own capacity to manage modern slavery within their broader supply chains.**

## We intend to progress the following actions:

- research and implement Australian/globally consistent approaches towards identifying, assessing and mitigating modern slavery risks across our operations and our supply chains;
- develop and implement a Keolis Downer modern slavery e-learning training module to increase employee awareness of modern slavery and the risks it poses to our operations and supply chain activity;
- modern slavery training module to form part of Keolis Downer employee induction process;
- review and update procurement policies and procedures to include reference to modern slavery and upload onto the Keolis Downer Group operating entities intranets / Sharepoint sites for business wide access;
- put in place a channel to report concerns or make further enquiries about modern slavery risks and embed those into business practices.

## Better understand our supply chain:

- for each future reporting period, undertake further assessments where geographical and industry risk will continue to be used to identify at risk suppliers and contractors;
- carry out further assessment and monitoring of a high-risk major supplier;
- explore whether supplier risk and compliance assessment can be enhanced through group wide use of technological platform solutions (such as Avetta and BVD) to further embed the supplier assessment and implement consistent supplier onboarding processes; and
- commence the review of procurement templates to assess the inclusion of terms and conditions specifying modern slavery obligations and review supply contracts as each of them are varied or renewed, where possible.





# Table of conformity to legislative requirements

The table below links the sections of the Statement that specifically address the mandatory content required under the Modern Slavery Act.

Australian Modern Slavery Act mandatory reporting criteria	KD response section
1. Identify the reporting entity	REPORTING ENTITY
2. Describe the reporting entity's structure, operations and supply chains of the reporting entity and any entities it owns or controls	REPORTING ENTITY OUR OPERATIONS OUR SUPPLY CHAIN
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	OUR SUPPLY CHAIN ACTIONS TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	ACTIONS TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY
5. Describe how the reporting entity assesses the effectiveness of these actions	ASSESSMENT AND EFFECTIVENESS OF OUR ACTIONS
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	CONSULTATION WITH OTHER ENTITIES
7. Provide any other relevant information	NEXT STEPS

## CERTIFICATION BY DIRECTORS

This statement was approved by the board of Keolis Downer Pty Ltd



Signed by **Philippe Massin**  
**Director of Keolis Downer**

# Appendix

## 1. Other Group Entities

KDR Gold Coast Pty Ltd ACN 150 236 936  
KDR Victoria Services Pty Ltd ACN 169 448 382  
Keolis Downer Bus and Coachlines Property Pty Ltd ACN 604 655 834  
Hornibrook Transit Management Pty Ltd ACN 010 693 348  
South West Transit Pty Ltd ACN 077 811 253  
Australian Transit Enterprises Pty Ltd ACN 066 987 086  
Hornibrook Bus Lines Pty Ltd ACN 010 013 224  
Path Transit Pty Ltd ACN 074 765 692  
Southlink Pty Ltd ACN 067 806 544  
Link SA Pty Ltd ACN 131 552 415  
Keolis Downer Hunter Pty Ltd ACN 614 205 766  
Keolis Downer Northern Beaches Pty Ltd ACN 621 012 717  
Keolis Downer South Australia Pty Ltd ACN 644 358 234

2. <https://www.globalslaveryindex.org/2018/findings/highlights/>

3. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print>

\*Annexure – Keolis Downer Modern Slavery Statement FY 2019/20.





\*Due to previous uncertainty of reporting requirements Keolis Downer Group did not submit a Modern Slavery Statement for FY2019/20, which has now been prepared and is annexed to this Statement.

## KEOLIS DOWNER GROUP

# MODERN SLAVERY STATEMENT

### Financial Year 2019-20

#### 1. IDENTIFY THE REPORTING ENTITY;

Keolis Downer Pty Ltd ACN 165 343 680 is the ultimate holding company of all group subsidiary entities and a reporting entity for purposes of this Modern Slavery Statement.

KDR Victoria Pty Ltd ACN 136 066 074 and Keolis Downer Bus and Coachlines Pty Ltd ACN 604 655 834 are also reporting entities for purposes of the Act and together with Keolis Downer have prepared this joint statement covering all Group subsidiary companies.

#### 2. DESCRIBE THE STRUCTURE, OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY;

Established in 2009, Keolis Downer is a joint venture between Keolis, a leading public transport operator established in 16 countries, and Downer, the leading provider of integrated services in Australia and New Zealand.

Keolis Downer is a leading operator and integrator of public transport in Australia. We operate and maintain the largest tram network in the world in Melbourne (Yarra Trams), the light rail network on the Gold Coast (G:link) and buses in New South Wales, Western Australia, South Australia and Queensland.

Keolis Downer's supply chain can be broadly classified across 5 categories:

- General Goods and Services: Purchases for operations including fuel, spare parts, uniforms, IT services and other items
- Maintenance Services: Maintenance works and services on vehicles and property.
- Subcontractors: Contractors hired by Keolis Downer to perform services such as consulting and other operational activities.
- Professional Services: Supporting functions for business which can include legal, financial and

accounting advisory in addition to other technical services.

- Capital Purchases: Purchase of assets such as fleet vehicles, land and buildings.

Keolis Downer's suppliers range from large established businesses to smaller local business.

The major suppliers used by Keolis Downer are essentially Australian which reflects our priority in supporting local Australian businesses.

#### 3. THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY, AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS;

##### Operations

As Keolis Downer operates only in Australia, the risk of causing or contributing to modern slavery through the use of labour is considered a low geographical risk. All direct employees are covered under employment agreements or conditions underpinned by National Employment Standards.

##### Our supply chain

The suppliers of products and services are largely Australian and are therefore considered a low geographical risk of modern slavery practices.

Keolis Downer recognises the purchasing of certain products and services are sourced from international suppliers thus being a higher geographical risk. Keolis Downer also sources services from suppliers in industries that are considered an industry risk for example cleaning services. These risks potentially expose Keolis Downer to being directly linked to modern slavery practices which requires further analysis and management.

### **Review of operations and supply chains**

We will conduct a more detailed assessment of our major suppliers and identify potential operations and supply chain modern slavery risks. Geographical and industry risk assessments will be undertaken to identify at risk suppliers and contractors relating to modern slavery.

## **4. THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITY THAT THE REPORTING ENTITY OWNS OR CONTROLS, TO ASSESS AND ADDRESS THOSE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES;**

### **Policies and Procedures**

The policies and procedures set out in the Keolis "Konformite" program to be implemented across the Keolis Downer operating entities include the Guide for Ethical Conduct, the Keolis Group Purchasing Charter and the Keolis Supplier Relations Charter. This Charter strictly prohibits suppliers and their extended "value creation chain" from use of child labour, forced or compulsory labour in any form, servitude, trafficking, slavery or the detention of migrants or clandestine workers. The Charter places requirements on all suppliers to ensure that all work must be done voluntarily, in exchange for legal compensation, and not exposed to threats or actual criminal sanctions or criminal prosecution, violence, detention, retention of identity documents or confiscation of legal rights or privileges. In addition, workers must be free to consent to accept employment and resign in accordance with applicable laws and regulations and collective agreements

Keolis Downer will implement and continue to develop our procurement and other policies in line with the requirements of the Konformite program. These policies will apply to all Keolis Downer companies, employees within Keolis Downer and we expect contractors, subcontractors and suppliers to apply similar standards.

### **Training**

Our employees must be aware of what modern slavery is and how to identify it in practice in order that they are able to identify and report any potential breaches.. We will develop educational tools to enable those employees who manage the supplier and contractor relationship to have an understanding of what modern slavery issues and relevant policies are.

## **5. DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF SUCH ACTIONS;**

Keolis Downer recognises the importance of monitoring how effective our anti- modern slavery processes are. We will actively take steps to review our approach to assessing and addressing modern slavery risks. In future reporting periods, Keolis Downer will develop a framework to measure the effectiveness of our actions.

## **6. DESCRIBE THE PROCESS OF CONSULTATION:**

Keolis Downer as the Modern Slavery Statement reporting entity, is associated with several other entities that it owns and controls. Keolis Downer's Modern Slavery Statement is a result of consultation and collaboration between all Keolis Downer Group companies. It is intended that all Keolis Downer entities will adhere to the same organisation-wide policies and procedures based on the Keolis Group "Konformite" compliance program.

## **7. COVID 19**

As a supplier of an essential service, Keolis Downer has continued to operate its passenger transport services throughout Australia during the pandemic. While there has been some impact on the supply chain from COVID-19 and related lockdowns, operations have continued largely uninterrupted due to majority of suppliers being located within Australia.

Employee and passenger safety has been a constant focus in our actions throughout the pandemic. There has been an increase in COVID related cleaning activities due to the pandemic.



## 8. ANY OTHER INFORMATION

The shareholders of Keolis Downer are wholly owned subsidiaries of Group Keolis S.A. "Keolis Group" and Downer EDI Limited "Downer Group". Downer Group (which includes Rail Services Victoria Pty Ltd, a direct shareholder of Keolis Downer) is a reporting entity and has prepared a Modern Slavery Statement. Due to uncertainty of reporting requirements, Keolis Downer Group has been late in the preparation of this Modern Slavery Statement for FY2019/20, which has now been prepared and is annexed to the Keolis Downer 2020/21 Modern Slavery Statement.

## CERTIFICATION BY DIRECTORS

This statement was approved by the Board of Keolis Downer Pty Ltd

A handwritten signature in blue ink, appearing to read 'Massin', with a stylized flourish extending from the bottom left.

Signed by Philippe Massin  
**Director of Keolis Downer**





Keolis Downer

VOLVO

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Transperth







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