tpg TELECOM

Modern Slavery Statement 2024

tpgtelecom.com.au

About this statement

TPG Telecom Limited (ABN 76 096 304 620) (the ultimate parent company in the TPG Telecom group of companies (the **TPG Telecom Group**)) submits this modern slavery statement (**statement**) as a joint statement, prepared pursuant to the *Modern Slavery Act 2018* (Cth) (**MSA**) on its behalf and on behalf of the other reporting entities within the TPG Telecom Group listed on page 6, (together referred to throughout this statement as **TPG Telecom, we, us, our or the reporting entities**). In submitting this statement, TPG Telecom Limited reports on the operations and supply chain of the whole TPG Telecom Group. This is our 2024 statement for the financial year ending 31 December 2024 (**reporting period**). Information provided in this statement is correct as at 31 December 2024.

Acknowledgement of Country

We acknowledge the Traditional Custodians of Country throughout Australia and the lands on which we and our communities live, work and connect. We pay our respects to their Elders, past and present.

Consultation

This statement was developed through engagement and consultation by the Human Rights and Modern Slavery Committee members with business functions covering the reporting entities and the entities they own or control.

The operations of these entities fall within the organisational structure, governance framework and executive management responsibilities of the ultimate parent company, TPG Telecom Limited. Prior to submission of this statement to the Board for approval, this statement was reviewed by the TPG Telecom Group Executive Leadership Team (**ELT**) and the Audit and Risk Committee.

The respective Company Secretary or Public Officer, as a representative of each reporting entity and each entity owned or controlled by the reporting entities, was also consulted during the development of the statement.

This statement has been approved by TPG Telecom Limited's Board of Directors, which is the principal governing body of TPG Telecom Limited, on behalf of the reporting entities on 27 June 2025[1] and is signed by the responsible member, the CEO and Managing Director of TPG Telecom Limited. Appendix 1 details how our statement addresses the mandatory reporting criteria as set out in the MSA.

Contents

1. TPG Telecom Limited approved the statement in its capacity as a 'higher entity' for the purposes of the MSA.

Message from the CEO and Managing Director

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At TPG Telecom, we are committed to doing our part in addressing modern slavery and upholding the highest standards of ethical conduct and human rights. By driving greater accountability and awareness through our organisation and supply chain, we can help address the ongoing issues related to modern slavery.

Our 2024 Modern Slavery Statement reflects this commitment, and we are proud of the progress we have made over the past year. Our key initiatives have continued to build on the foundations of the past as we implement new ways to enhance awareness, improve training, and strengthen supplier due diligence processes.

During the reporting period, we launched our technology-driven Third-Party Due Diligence Program, which significantly improves our ability to identify and mitigate potential risks of modern slavery within our supply chain.

To enable our staff to be well-equipped to recognise and address modern slavery risks, we launched online refresher training modules and incorporated modern slavery-based scenarios into our business continuity exercises. These initiatives provide practical guidance and support, empowering our employees to take proactive measures in their day-to-day activities.

We also formalised our modern slavery response policy and protocol, ensuring a comprehensive and structured approach to addressing modern slavery risks and refreshed our precedent modern slavery contract clauses with a risk-tiered approach.

Continued collaboration with our industry peers and the Telco Together Foundation has allowed us to share best practices, helping us drive positive change within the telecommunications industry and beyond.

We believe building strong connections and driving accountability through our supply chain and industry peers will help contribute to a world free from modern slavery.

Enhancing partnerships, improving our internal processes and sharpening grievance mechanisms will help us and our industry peers stay vigilant to the risks of modern slavery. This shared commitment will be key to driving meaningful change within our operations and the telco industry.

P. Berroeta

Iñaki Berroeta
Chief Executive Officer and Managing Director
TPG Telecom Limited

27 June 2025

1. Overview

2024 Highlights

During the reporting period, we focused our efforts on targeted initiatives to further refine our modern slavery risk management approach.

Risk Management

Implemented a technology-driven Third-Party Due Diligence Program and refreshed our precedent modern slavery contract clauses with a risk-tiered approach, see page 18.

Leadership

The Modern Slavery Roadmap was endorsed by the Executive Leadership Team, Audit and Risk Committee and the Board, see page 15.

Capability

Launched a Modern Slavery Online Refresher training module and incorporated modern slavery-based scenarios into our Business Continuity Exercises, see page 19.

Collaboration

Continued collaboration with industry peers and the Telco Together Foundation, fostering valuable connections and developing a supplier pathway document with industry peers, see page 21.

Performance

Formalised our Modern Slavery Response Policy & Protocol, see page 16.

Our Commitments

We recognise the need for continuous improvement and proactive measures to address potential modern slavery risks within our operations and supply chain. This involves actively monitoring the implementation of the commitments outlined in our FY23 Statement.

2024 Commitments	Progress
Risk Management • Implementation of a Third-Party Due Diligence Program • Refreshed precedent modern slavery clause with a risk-tiered approach • Completion of our modern slavery Hot Spot analysis	● Implemented Third-Party Due Diligence Program and technology solution ◐ Precedent modern slavery clause with a risk tiered approach completed, and work continues with the procurement team to embed the new clauses into our due diligence processes ● Modern slavery 'Hot Spot' analysis of TPG Telecom's direct suppliers completed, with insights used to inform our supplier risk assessment
Capability • Continue the roll out of targeted training to employees in Procurement, Finance and Retail • Review the content of the online Modern Slavery Training and propose updates if required	◐ Targeted training provided to the Procurement and Bidding teams ● A training needs analysis was conducted on all business units including Finance and Retail, to inform the 2025 modern slavery communication and training plan ● Reviewed and refreshed the Modern Slavery e-Learning module ● Designed and implemented a new Modern Slavery refresher e-Learning module
Performance • Assess our existing grievance mechanism for modern slavery-related complaints to ensure alignment with the United Nations Guiding Principles (UNGPs) • Implement TPG Telecom's Modern Slavery Response Policy and Internal Modern Slavery Notification Form to guide the investigation of any actual or potential instances of modern slavery	● Introduced a modern slavery reporting option within our new grievance mechanism - Whispli - following a review of existing channels ● A dedicated internal Modern Slavery Notification Form is now available to all employees via the TPG Telecom intranet ● TPG Telecom's Modern Slavery Response Policy and Protocol implemented
Leadership • Propose the 3-year Modern Slavery Roadmap to the ELT and Board for endorsement and progress of the implementation of the initiatives • Provide a strategic briefing to the TPG Telecom Board covering refresher training, TPG's legal reporting obligations and potential changes following the review of the MSA	● The Modern Slavery Roadmap was endorsed by the Executive Leadership Team, Audit and Risk Committee and the Board ● Strategic briefing provided to the Board, including detailed information on the reporting obligations, industry insights and potential changes following the review of the MSA
Collaboration • Continue partnership with Telco Together Foundation to address modern slavery in the Telco industry	● The collaboration with our industry peers and Telco Together Foundation is an ongoing commitment. Refer to section on 'Collaboration' on page 21

● Completed   ◐ Ongoing

2. Our structure, operations and supply chain

Our Structure

TPG Telecom Limited is the ultimate parent company in the TPG Telecom Group and the immediate parent of TPG Corporation Limited. Both TPG Telecom and TPG Corporation Limited are reporting entities for the purposes of the MSA, with TPG Corporation Limited serving as the holding company of the balance of TPG Telecom Group's reporting entities under the MSA.

Reporting entities

AAPT Limited ACN 052 082 416;

iiNet Limited ACN 068 628 937;

PowerTel Limited ACN 001 760 103;

Telecom Enterprises Australia Pty Limited ACN 062 920 601;

Telecom New Zealand Australia Pty Ltd ACN 050 060 341;

TPG Corporation Limited ACN 093 058 069;

TPG Holdings Pty Limited ACN 003 328 103;

TPG Internet Pty Ltd ACN 068 383 737; and

TPG Telecom Limited ACN 096 304 620.

Our purpose

As a full-service telecommunication company, our networks are connecting Australia for the better. Our purpose is to build meaningful relationships and support vibrant, connected communities. We aim to do business in a way which responds to the needs and expectations of all our stakeholders – including our customers, employees, shareholders, regulators, suppliers and our wider society. We are committed to acting as a responsible and sustainable business, recognising its fundamental role in creating and safeguarding long-term value.

Our values

Our commitment to identifying and addressing modern slavery is underpinned by our core values. The Spirit of TPG Telecom represents our culture, how we work together and how we deliver to our customers and communities. It is defined by our four values, which guide how we think and behave, what we prioritise, and the experiences we create for our customers and communities every day. The principles of stepping up, standing together and being brave are central to our modern slavery risk management approach.

Stand together
Together we are unstoppable when we rally around customer needs.

Own it
We step up for our customers and own their entire experience.

Simple's better
We make things better and challenge each other to find a simpler way.

Boldly go
We are human, curious and brave to change the game.
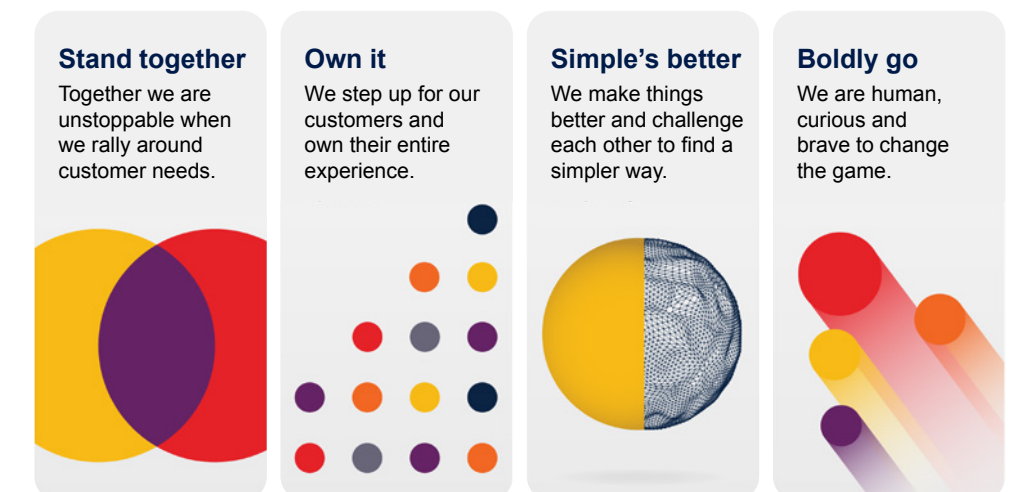
More information about the TPG Telecom Group, including our structure, purpose and sustainability strategy is available on our website: www.tpgtelecom.com.au.

Our Operations

~3,300
employees[3]

~7.6m
Fixed and mobile services in operation to customers

1.0m+
Square kilometers mobile network coverage

~7,700
Mobile sites including regional network sharing

Our brands

TPG Telecom operates several leading mobile and internet brands including Vodafone, TPG, iiNet, AAPT, Internode, Lebara and felix, providing consumers with a comprehensive portfolio of fixed and mobile products in the Australian telecommunications market.

vodafone

tpg

iinet

Internode

LEBARA

AAPT

felix

Mobile Network
We operate Australia's 2nd largest fixed voice and data network listed on the Australian Securities Exchange, with a leading network of over 5,700 sites.

Contact centres
We are supported by outsourced centers in India, the Philippines[2], South Africa[3], and Fiji.

Intercarrier
We have over 500 intercarrier relationships with domestic and international partners to ensure inter-operability of mobile services globally.

Wholesale
We provide wholesale services to other service providers, network providers, content providers and several mobile virtual network operators.

Retail outlets
We own approximately 90 retail stores across Australia.

Dealer network
We are supported by approximately 150 Vodafone branded stores operated by 8 Dealer groups.

2. On February 20 2024, Tech Mahindra acquired (100% equity shares) Orchid Cybertech Services Incorporated (**OCSI**) (Philippines) from TPG Telecom. OCSI continues to provide the existing shared services and customer support back to TPG Telecom.
3. South Africa contact centre was disengaged on 31 December 2024.

Our workforce

As at the end of 2024, TPG Telecom had 3,282 employees, primarily located across Australia with one employee in Guam. Our direct workforce reduced from over 6,000 to just over 3,000 employees in the current period, primarily due to the Tech Mahindra acquisition of Orchid Cybertech Services Incorporated.[4] Our direct workforce includes employees based in corporate offices, contact centres and retail stores, as well as field-based employees working in network and fibre operations. We also have an indirect workforce based in Australia, India, Fiji, the Philippines, and South Africa, including customer service agents, network operations and technology support agents.

While the majority of our employees are permanent, we do employ a small number on a casual basis and fixed-term basis. We also employ people on a variety of different working visas. We do not employ anyone under the age of 18.

Employees	Total
Permanent	3,177
Casual	20
Fixed term contractor	85
Total	**3,282**

Based on direct workforce headcount as of 31 December 2024.

4. On February 20 2024, Tech Mahindra acquired (100% equity shares) Orchid Cybertech Services Incorporated (**OCSI**) (Philippines) from TPG Telecom. OCSI continues to provide the existing shared services and customer support back to TPG Telecom.

Legend:
- Direct workforce
- Indirect workforce
- High risk
- Medium risk
- Low risk
- N/A

Map annotations:
- Approx. **2,749** in the Philippines[4]
- Approx. **3,023** in India
- **1** in Guam
- Approx. **50** in South Africa
- Approx. **373** in Australia
- **3,281** in Australia
- Approx. **52** in Fiji
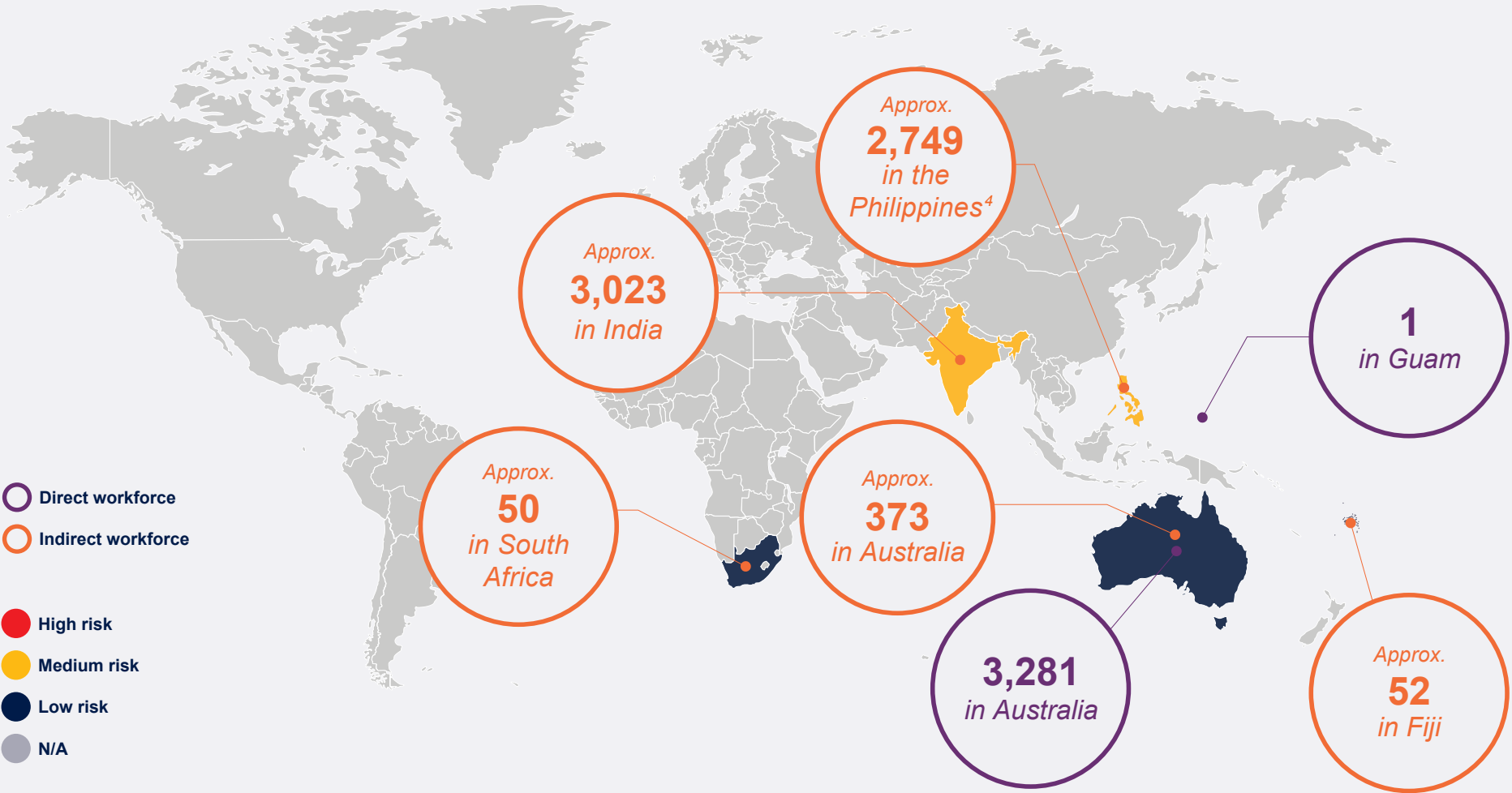
TPG Telecom's Direct and Indirect Workforce Global Spread against the Walk Free Global Slavery Index

Country	Estimated prevalence of modern slavery (per 1,000 people)	Estimated number of people in modern slavery
Australia	1.6	41,000
India	8	11,000,000
The Philippines	7.8	859,000
South Africa	2.7	158,000
Guam*	N/A	N/A
Fiji*	N/A	N/A

* Based on Workforce headcount as of 31 December 2024. Estimated prevalence of modern slavery by country according to Walk Free's Global Slavery Index. The Global Slavery Index has no available data on the estimated prevalence of modern slavery or estimated number of people in modern slavery for Fiji and Guam.

Our supply chain

TPG Telecom relies on a global supply chain to procure a diverse range of goods and services from around the world to operate our fixed and mobile infrastructure and service our customers.

TOTAL SPEND IN AUSTRALIA

93%

MORE THAN

1,300

TOTAL SUPPLIERS

THE TOP 100 SUPPLIERS ACCOUNT FOR

94%

OF OUR TOTAL SPEND

TPG Telecom Suppliers

At TPG Telecom, we recognise the vital role of our suppliers in supporting us to deliver essential telecommunications services for Australia. In order to effectively serve our customers, we rely on a network of partnerships with diverse service providers, associates and suppliers. There were no significant changes to our procurement profile during the reporting period. The majority of our spend continued to be for goods and services from enterprises that are located in Australia, India, the United Kingdom and the United States.

Although 93% of our procurement spend is with suppliers based in Australia, we recognise that our direct suppliers may have offshore manufacturing operations and their own tiers of domestic and international suppliers. As such, we acknowledge that the risks of modern slavery may be present across multiple tiers in our supply chain and are committed to continually building our understanding of our supply chain to help inform our understanding of where modern slavery risks may exist.

Spend per Region

- Australia & New Zealand
- Asia
- US & Canada
- UK & Europe
- Africa

1.9%
0.88%
4.48%
0.13%
92.62%
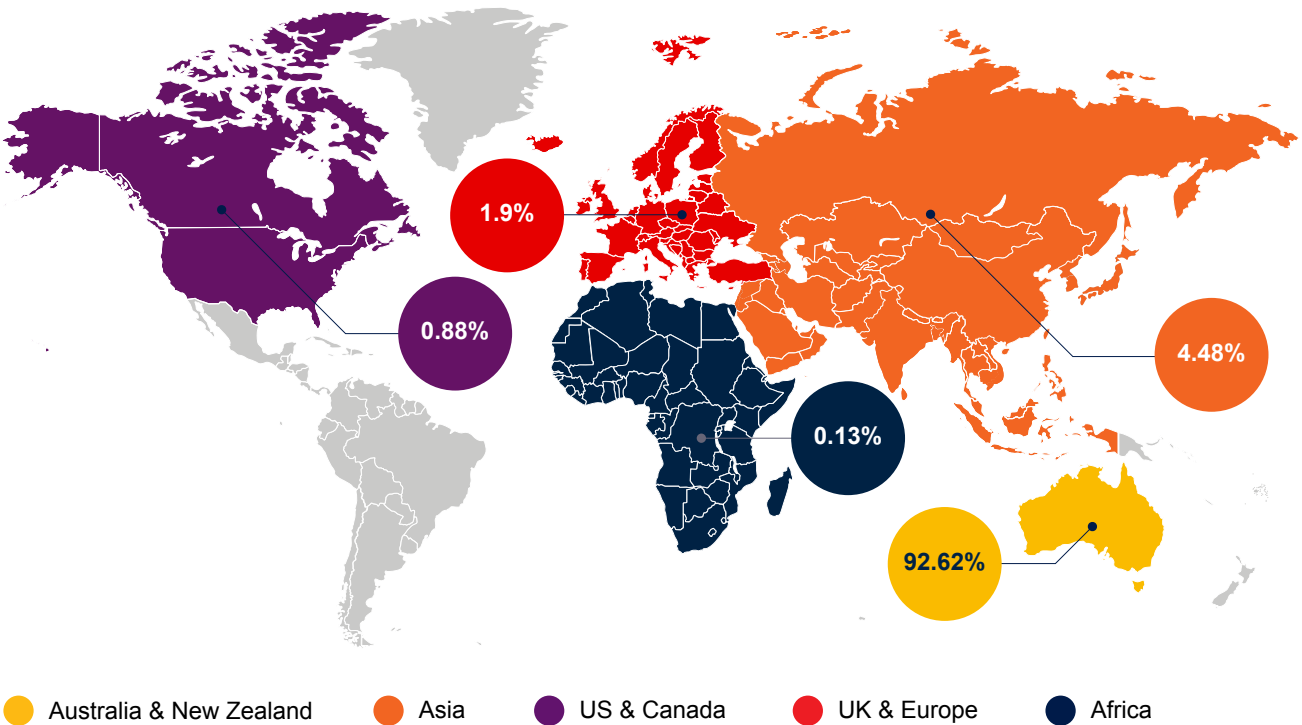
88% of our procurement spend is allocated to the following five categories of goods and services:

1
Intercarrier
Charges incurred for using another carrier's network to start, transmit, and/or complete telecommunications traffic. For example, access fee costs for NBN.

2
Network
Expenses associated with maintaining and operating our network, such as transmission equipment and services.

3
Commercial Inventory
Spend related to devices, including mobile, modems, tablets, wearable accessories and sim cards.

4
Corporate Services
Spend related to the operation of our services, including but not limited to property management, call centres, facilities management and logistics.

5
Professional Services
Spend related to, but not limited to, consulting services, legal services and insurances.

3. **Identifying modern slavery risks in our operations and supply chain**

At TPG Telecom, we are committed to respecting all internationally recognised human rights as set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

This commitment recognises the expectations for responsible business conduct set out in the UN Guiding Principles on Business and Human Rights (**UNGPs**) and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. In line with the UNGPs, our modern slavery risk management approach considers the risks to people across our operations and supply chain.

Operating in a highly complex and evolving industry such as the telecommunications industry means that regularly reviewing our modern slavery risk profile is essential. Evolving regulation, technological advances, challenging geopolitical, societal and macroeconomic factors and other issues can contribute to changes in our risk profile, including how and where TPG Telecom may be exposed to risks of modern slavery.

We recognise that our modern slavery risk profile is influenced by risk factors relating to geography (such as where suppliers may source from a country with a higher prevalence of modern slavery), vulnerable populations (such as migrant workers), entity risks (such as potential poor practices by specific suppliers) and sector risks (such as sectors where practices such as excessive working hours may be common). We are committed to continuously working to identify and strengthen our understanding of the modern slavery risks within our operations and supply chains, and to responding to any changes to our risk profile accordingly.

Cause

A telecommunications company could cause modern slavery if it intentionally engaged in serious exploitation such as forced labour

Contribute

A telecommunications company may contribute to modern slavery if it failed to act on credible reports that an IT support provider is using deceptive recruitment practices and withholding passports to prevent workers from leaving

Directly Linked

A telecommunications company may be directly linked to modern slavery if it procures Wi-Fi modems from a manufacturer that sources raw materials that are extracted by sub-suppliers using child labour

UNGP's Continuum of Involvement

Understanding our relationship to modern slavery risks

In considering how TPG Telecom is connected to modern slavery risks in our operations and supply chain, we draw on key concepts from the UNGPs: cause, contribute, and directly linked. The UNGPs are the authoritative global standard for preventing and addressing human rights impacts by business and outline expectations that businesses should 'avoid **causing** or **contributing** to adverse human rights impacts through their own activities and address such impacts when they occur' and 'seek to prevent or mitigate adverse human rights impacts that are **directly linked** to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.[5]

We understand that as a business we may cause, contribute, or be directly linked to modern slavery through our operations and through activities that take place within our supply chain.

Cause modern slavery by engaging in forced labour practices to employ workers

Contribute to modern slavery by failing to address known human rights abuses in our supply chain such as suppliers using child labour

Be **directly linked** to modern slavery where a supplier uses subcontractors who subject workers to coercive and exploitative conditions

During the reporting period, we conducted a modern slavery risk assessment of our supply chain which included consideration of our potential involvement in the identified risk areas.

5. UN Guiding Principles on Business and Human Rights published in 2011 and available on https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

Potential modern slavery risks in our operations and supply chain

Identifying modern slavery risks in our operations

As part of our ongoing commitment to identifying and addressing modern slavery risks, we continue to examine potential areas of risk within our operations. We consider the risk of modern slavery in our operations as low due to the nature and location of most of our work and due to the controls TPG Telecom has in place (see page 17 for further details). However, we acknowledge that there may be risks associated with our indirect workforce due to the below risk factors:

1. Work is conducted in countries with elevated risk of modern slavery or broader labour rights violations.
2. Potential use of workers who may be vulnerable, such as migrant or temporary workers.
3. Potential use of labour hire providers who may engage in deceptive recruitment practices.

Identifying modern slavery risks through a modern slavery 'Hot Spot' analysis of direct suppliers

During the reporting period, we continued our work with Pillar Two a specialist business and human rights advisory firm on a modern slavery 'Hot Spot' analysis of TPG Telecom's direct suppliers. This analysis involved mapping and assessing modern slavery risks across our direct supply chain to identify key areas of modern slavery risk. The analysis identified the products and services we procure that have a higher modern slavery risk profile and highlighted specific risk factors associated with each 'Hot Spot'. The analysis also considered TPG Telecom's relationship to each risk area, based on the UNGPs continuum of involvement. The analysis highlighted that TPG Telecom is most likely to be 'directly linked' to the modern slavery risks identified in our supply chain. However, it also explained the circumstances in which we may move from being 'directly linked' to modern slavery to potentially 'contributing' to it. For example, this could occur if we put pressure on a supplier to reduce costs to an extent that could only be met by the supplier engaging in exploitative practices or if we failed to act on credible reports of exploitation.

This exercise provided us with an evidence base for determining how we assess risk and prioritise supplier risk management and engagement going forward. The findings also supported the development of our new compliance due diligence platform which assesses the level of modern slavery risk associated with each supplier (see page 18 for further details). A summary of our modern slavery 'Hot Spots' is provided in the graphic below.

Labour related risks

Carbon offsets
Partners and providers of carbon offset credits undertaking reforestation projects

ICT Services
Data centres, phone and voicemail services, IT consulting and management

Logistics
Road transport, couriers and warehousing

Dealer partners and retailers
Branded retail stores and other retailers that sell TPG Telecom products

Contact Centres
Support centres for TPG Telecom customers and employees

Facilities services and management
Building maintenance and repairs, cleaning and security

Material related risks

Uniforms
Vodafone and TPG Telecom branded uniforms for employees

Office supplies, print and promotional material
Marketing print services, promotional and advertising printing and office consumables

ICT equipment
Handsets, modems and wearable computing devices

Labour and Material related risks

Building construction
Physical works to build and maintain the network infrastructure

Network equipment, construction and maintenance
Products to maintain and operate the network

Potential Risk Factors

- 🟠 Low-skilled labour
- 🟡 Temporary labour
- 🔴 Strong pricing competition
- 🔵 Migrant labour
- ⚫ Sub-contracting & Complex supply chains
- 🟣 Sourcing from high-risk geographies

4. Addressing modern slavery risks

Governance

TPG Telecom is committed to identifying the risks of modern slavery within our operations and supply chain and taking meaningful steps to address such risks. A formalised governance structure is in place to oversee our modern slavery roadmap including monitoring progress against our planned initiatives.

The highest level of responsibility for modern slavery strategy and response sits with the TPG Telecom Board of Directors (**the Board**), which has oversight of strategy, business performance, compliance and risk management. The Board has established the Audit and Risk Committee (**the ARC**) to assist in its oversight of an effective risk management framework, including modern slavery risk management.

At an operational level, our modern slavery work is driven by a dedicated cross-functional Human Rights and Modern Slavery Committee (**the Committee**), led by the Head of Compliance and Enterprise Risk, with representation from Sustainability, People Experience, Procurement, Enterprise Risk, Legal and Compliance teams.

Roles and Responsibilities

TPG Telecom Board of Directors

Responsible for overseeing TPG Telecom's modern slavery strategy and response, including approving our Modern Slavery Statement.

Human Rights and Modern Slavery Committee

A cross-functional committee overseeing TPG Telecom's human rights and modern slavery commitments and initiatives.

Audit & Risk Committee (ARC)

Assist in the oversight of an effective risk management framework, including modern slavery risk management.

Group Compliance – Business Integrity

Oversee the modern slavery roadmap, advise on risk management, and promote compliance and awareness of human rights and modern slavery laws.

Executive Leadership Team (ELT)

Assist in the oversight and review of potential human rights and modern slavery risks within our operations supply chain, strategic direction and compliance.

All TPG Employees

Responsible for identifying, reporting and monitoring modern slavery risks within their relevant business units.

Modern Slavery Framework

Our Modern Slavery Framework sets out a comprehensive approach to addressing modern slavery risks in our operations and supply chain. Developed in 2022, the framework is grounded in a human rights-centred approach, employing a risk-based strategy to identify and address modern slavery risk, while promoting continuous improvement, collaboration, transparency and accountability.

The Framework's five pillars are foundational to our approach, providing us with an overarching strategy that allows us to set goals and track and monitor the effectiveness of our modern slavery response.

Risk Management
Identify and manage modern slavery risks in operations and supply chain.

Capability
Adopt strategies for addressing modern slavery through awareness and action.

Performance
Monitor and review the effectiveness of the Modern Slavery Framework.

Leadership
Oversee the Modern Slavery Framework and implementation of initiatives.

Collaboration
Actively identify and participate in industry initiatives to eradicate modern slavery.

Goals

The goals underpinning the Modern Slavery Roadmap act as benchmarks for measuring progress and facilitate ongoing evaluation and improvement. Through periodically revisiting the goals, we are able to adapt the Modern Slavery Roadmap to changing circumstances to help ensure it remains fit-for-purpose.

Develop and implement a people focused risk-based approach for detecting, evaluating and mitigating modern slavery risk throughout our operations and supply chain proportionate to our level of influence, our capacity and our risk profile.

Integrate modern slavery risk management into corporate governance structure, policies and reporting mechanisms.

Build trust by cultivating meaningful relationships and strengthening the capacity of internal and external stakeholders, including employees, suppliers and customers, to identify, assess and manage modern slavery risks.

Respond to evolving needs and expectations of stakeholders – including our customers, employees, shareholders, regulators and wider society, ensuring our approach aligns with industry practice, growing stakeholder expectations and the evolving legislative landscape.

Modern Slavery Roadmap

Developed in the previous reporting period, the Modern Slavery Roadmap underpins the Modern Slavery Framework by setting out our target state followed by staged action plans. The Roadmap enables TPG Telecom to implement a structured and targeted approach to managing our modern slavery risks. Within each stage of our Roadmap, we use the target state and our goals to drive the prioritisation of activities.

2025 Outlook

- Continue to progress our Modern Slavery Roadmap
- Continue to refine the Third-Party Due Diligence Program and technology
- Design reporting on our Tier 1 Supplier due diligence outcomes to support insights into modern slavery risk management processes
- Develop an approach to monitoring and evaluating employee knowledge and awareness of modern slavery
- Design a dedicated internal modern slavery resource Hub
- Continue partnership with Telco Together Foundation to address modern slavery in the telecommunications industry

Target State

Stage One:
Laying Foundations

Establishing a strong foundation to support the management of modern slavery risks

- Presentation of Roadmap to the TPG Telecom Board
- Modern slavery risks are identified through the implementation of a comprehensive third-party due diligence program
- Capability is strengthened through training needs analysis, communication plans and clear policy

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Stage Two:
Embedding Foundations

Embedding the foundations into routine operations and standard practices

- The design of training programs are informed by reporting insights
- Access to support and guidance materials are readily available to support employees with making decisions around managing modern slavery risks
- Supplier engagement and capability building supports our supply chain with managing modern slavery risks

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Stage Three:
Scale up & Refine

Refining our approach to modern slavery risk management

- Refinement of third-party due diligence processes, leading to improved identification and mitigation of modern slavery risks
- Key initiatives are reviewed and assessed informing a refreshed Modern Slavery Roadmap
- Key Performance Indicators (KPI's) are refined and focus on both outcomes and outputs

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Policy framework

Our commitment to upholding human rights is underpinned by a strong policy framework designed to identify, prevent and address modern slavery risks. Our policies set out clear expectations for our employees, suppliers, and business partners while enabling every stakeholder to have a safe and accessible way to raise concerns about human rights violations, including modern slavery.

Addressing modern slavery is a responsibility we take seriously. Building trust and fulfilling our purpose means taking care of our people, our customers and our communities. Doing the right thing starts with each of us, every day.

Policy area	Description of policies and relevance to modern slavery	Implementation and communication
People Related Policies	Our Code of Conduct sets out our expectations for the behaviours of all our people. It highlights our commitment to supporting local and international efforts to address modern slavery and includes a commitment to respect human rights in line with international frameworks. Our Human Rights Policy sets out our commitment to respecting internationally recognised rights and applies to all employees, workers of all entities controlled by TPG Telecom in the jurisdictions in which we operate. The Policy recognises the potential human rights risks (including modern slavery) that may exist within our operations and makes a commitment to our customers, employees, community and suppliers to identify and respond to these risks with guidance from key international principles.	Our Code of Conduct is available on our website and is communicated to all employees and provided to all contractors. Our Human Rights Policy is available on our website and is communicated to all employees.
Risk Management	Our Risk Management Policy and risk management procedures outline the process to identify, assess, manage and report risks. This process is used to assess all strategic, compliance, operational and financial risks to TPG Telecom, including those related to modern slavery risks.	Our Risk Management Policy is available internally to employees on our Intranet and is communicated to all employees.
	Our Third-Party Risk Management Policy establishes a consistent group-wide approach for identifying, assessing, monitoring, and managing the risks associated with Third Party Engagements, including those related to modern slavery risks.	Our Third-Party Risk Management Policy is available internally to employees on our Intranet and is communicated to all employees.
Supplier Related Policies	Our Supplier Code of Conduct outlines our commitment to conducting business in an ethical, legal and socially responsible manner. It sets out the minimum requirements expected of our suppliers regarding compliance with laws, labour and human rights (including modern slavery), business integrity, workplace health and safety, privacy, business continuity and environmental management.	Our Supplier Code of Conduct is available on our website and is provided to all suppliers.
	Our Human Rights Policy (referred to above) also applies to our suppliers and sets out the expectations mentioned above in People Related Policies.	Our Human Rights Policy is available on our website and is communicated to all suppliers.

Policy area	Description of policies and relevance to modern slavery	Implementation and communication
Response and Remediation	Our Crisis and Emergency Management Plan outlines the incident management processes to follow during an emergency or crisis, including incidents relating to modern slavery.	Our Crisis and Emergency Management Plan is available internally to employees on our Intranet.
	Our Modern Slavery Response Policy outlines how actual or potential cases of modern slavery will be managed, with a primary focus on prioritising the well-being of survivors. At its core, the policy is driven by the fundamental principle of respecting the rights of those that may be impacted by modern slavery. It aims to ensure that TPG Telecom responds to allegations or incidents of modern slavery in a rights-respecting manner and in line with the expectations outlined in the UNGPs.	Our Modern Slavery Response Policy is available internally to employees on our Intranet.
Speak Up Mechanisms	Our Whistleblower Policy outlines how concerns can be reported and encourages eligible whistleblowers[6] to speak up if they observe or suspect any improper conduct. It outlines how a report can be made, how we investigate and deal with improper conduct, and how we will support and protect a whistleblower throughout this process.	The Whistleblower Policy is available on our website and is communicated to all employees on our Intranet. Our whistleblower policy is also included in our internal modern slavery training and communicated to our suppliers via the Supplier Code of Conduct.
	Our Grievance Handling Policy applies to all our people including directors, employees, and contractors, providing a guide on what to do in the case of a grievance, and information on how a grievance is handled including how an investigation works and possible outcomes.	Our Grievance Handling Policy is available internally to employees on our Intranet.

6. Eligible whistleblowers are as follows: employees; directors; officers; suppliers (and their employees); consultants; and any relatives, dependents or spouses (including dependents of spouses) of our employees, directors, officers, suppliers and consultants.

Managing modern slavery risks in our operations

Throughout all we do, TPG Telecom aims to respect the human rights of people working in our operations. We understand the importance of managing the risks of modern slavery present to our direct and indirect workforce across both our domestic and global operations.

The TPG Telecom Compliance Framework guides how we manage modern slavery risks in our operations, in addition to how we manage our obligations, requirements and controls. While we consider the risk of modern slavery to our direct workforce to be low, we acknowledge the importance of regularly reviewing our risk profile based on any future changes to our operating context. During the reporting period, we commenced a review of our operational controls to ensure that they remain fit for purpose and align with our risk profile.

Managing risks in our Direct Workforce

Due to the location of our direct workforce, the nature of work and the controls we have in place, we consider the risk of modern slavery in our direct workforce to be low. Our direct workforce is managed by our 'People' related processes outlined in the table below.

Direct Workforce	Our Response
Within Australia Employees based in corporate offices, contact centres and retail stores, as well as field-based employees working in operations.	• Our frontline employees are covered by the Connect Enterprise Agreement. • We have dedicated Employment Law and Work Health Safety resources that continually monitor and audit our pay and workplace conditions to ensure they are appropriate. • We listen to our team members directly through our twice-yearly engagement survey and have various methods to report concerns via our speak up mechanisms. • Mandatory completion of modern slavery e-learning module with completion rates monitored and reported on.

Managing risks in our Indirect Workforce

TPG Telecom's business operating model relies on an indirect workforce provided by our key service partners in Australia, India, South Africa, the Philippines[7], and Fiji. Our indirect workforce delivers three main services outlined in the table below. We have a range of controls in place in relation to our indirect workforce which are also outlined in the table below.

Indirect Workforce	Our Response
Customer care Use of outsourced service providers with workers located in India, South Africa, Philippines[7] and Fiji.	• Annual compliance programs are in place for outsourced contact centres including pulse checks, control reviews and audits. • Mandatory completion of modern slavery e-learning module with completion rates monitored and reported on. • On-site visits to key contact center locations, allowing us to engage directly with employees and observe practices firsthand. • Due diligence of outsourced service providers via our new third-party diligence platform in a staged approach.
IT and Network services Use of outsourced service providers with workers located in India and Philippines to provide services to operate information systems, fixed and mobile networks.	• We actively monitor and report on modern slavery matters through regular contract reviews and dedicated oversight governance forums. • Employee compensation reviews are conducted including benchmarking review of salaries. • Mandatory completion of modern slavery e-learning module with completion rates monitored and reported on. • Due diligence of outsourced service providers via our new third-party diligence platform in a staged approach.
Dealers Use of partners to provide services to consumers and businesses.	• Precedent dealer contractual terms and conditions for consumer and enterprise dealer agreements for mobility services include a right to audit, an obligation to comply with laws and applicable TPG Telecom policies. • Monthly Operational Reviews and Mystery Shopping Programs are in place to help us maintain a high level of visibility of Partner's businesses. • Mandatory completion of modern slavery e-learning module with completion rates monitored and reported on. • During the reporting period, we performed compliance reviews with our dealer channel partners.

7. On February 20 2024, Tech Mahindra acquired (100% equity shares) Orchid Cybertech Services Incorporated (**OCSI**) (Philippines) from TPG Telecom. OCSI continues to provide the existing shared services and customer support back to TPG Telecom.

Managing modern slavery risks in our supply chain

We value long term partnerships with our suppliers.

These relationships are the foundation for building trust, transparency, and open communication. Our aim is to work with responsible business partners who share our commitment to upholding human rights. We recognise the importance of robust supplier governance across the Supplier Management Lifecycle to support efforts to identify, prevent and manage modern slavery risks and prioritise continuous improvement in our approach.

In 2024 we made progress through a focus on refining our Third-Party Risk Management Framework, further defining our Third-Party Risk Management Policy and revising our Supplier Code of Conduct.

Our expectations are documented in our Procurement Terms and Conditions, which incorporate modern slavery clauses, as well as our Supplier Code of Conduct, both of which outline our expectations of suppliers.

Our internal procurement process includes pre-qualification reviews related to health, safety, environment, data security, economic sanctions, finance, tax, privacy and other relevant laws and regulations.

TPG Telecom acknowledges that customs, traditions, and practices vary across countries. However, our Supplier Code of Conduct clearly outlines the expectation that all suppliers must adhere to relevant local and international laws, as well as the fundamental conventions and labour standards outlined by the International Labour Organization.

Supplier Due Diligence

During the reporting period, we implemented a technology due diligence platform to support the identification and mitigation of modern slavery risks in our supply chain. Our approach to supplier risk management is outlined below:

Identify

We conduct initial onboarding and screening of our suppliers in the due diligence platform. This includes an assessment which allocates a level of modern slavery risk associated with the supplier, this risk rating is based on geographical, entity, product/services and industry risks.

Analyse

For suppliers that we consider to be higher risk, they are asked to complete a self-assessment questionnaire. Where potential red flags may be identified through the questionnaire process, we will engage in deeper engagement with the supplier.

Mitigate

We have a number of strategies in place to mitigate potential modern slavery risks in our supply chain. This includes:

- Refreshed risk-tiered precedent modern slavery contract clauses that are responsive to the level of potential modern slavery risk associated with the supplier; and
- Supplier training and guidance materials that outline TPG Telecom's expectations and assists suppliers to understand what modern slavery is, how to identify the signs and how to report it

Treat

- Ongoing monitoring of suppliers and mitigation action plans
- Reassessment frequency linked to risk rating

SNAPSHOT

TPG Telecom's Supplier Questionnaire

During the reporting period, we developed a supplier self-assessment questionnaire to assist us with identifying potential modern slavery risks associated with suppliers. The questionnaire is sent to those suppliers that we consider to be higher risk based on an initial assessment. As our process evolves, we will look to broaden our approach beyond suppliers in the high-risk category. The questionnaire seeks to understand where the risk of modern slavery may be in the supplier's operations and supply chain and what controls they have in place to manage them. The types of issues that are covered in the questionnaire include:

- Prevalence of vulnerable workers (e.g. migrant workers or lower skilled workers)
- Engagement of younger workers under the age of 18
- Use of outsourcing arrangements
- Visibility across the supply chain including beyond tier 1
- Governance, policies and procedures to manage modern slavery risks
- Modern slavery due diligence activities to screen prospective suppliers, and
- Existence of modern slavery training and capacity building activities.

Integrating Modern Slavery Awareness into Business Continuity:

A Practical Approach

During the reporting period, we introduced modern slavery scenarios, referred to as "injects" into several of our business continuity exercises to prompt participants to recognise the issue and determine the appropriate steps to take in response.

By embedding these real-world scenarios into our existing business continuity exercises, we created a practical and dynamic learning experience that encouraged critical thinking and cross-functional collaboration. Through these exercises, teams gained a deeper understanding of their role in identifying and managing modern slavery risks in a way that aligned with their specific operational responsibilities.

Since implementing these injects, we have gained valuable insights into how different teams approach modern slavery risks, including any gaps in awareness, decision-making processes, and response strategies. These learnings will inform our ongoing training initiatives, allowing us to refine our approach and tailor future scenarios to better reflect the real-world challenges each team may face.

Moving forward, we plan to continue integrating and enhancing these injects, focusing on relevant scenarios that are practical and aligned with the unique responsibilities of each business unit. By doing so, we aim to strengthen our organisational response to modern slavery risks and embed proactive risk management into our everyday operations.

Training and awareness

Training and awareness are essential to our approach to combating modern slavery, equipping our people with the knowledge and skills to identify, mitigate and manage risks, while cultivating a secure and supportive environment for reporting concerns.

Training

All TPG Telecom employees have a role to play in identifying and managing modern slavery risks. During the reporting period, we enhanced our modern slavery e-learning module to better align with TPG Telecom's operating context and risk profile. This training is mandatory for all new employees, both in Australia and offshore, across Corporate, Enterprise Wholesale and Government, Retail, Partner and Care channels. The Compliance team monitors completion rates for this training across the business throughout the reporting period.

Additionally, during the reporting period, we developed a modern slavery refresher module to reinforce and assess the knowledge retained from the initial e-learning module completed during onboarding. This mandatory refresher module, required to be completed every two years, is monitored by the Compliance team, who in 2025 plan to analyse completion and response patterns to identify knowledge gaps and deliver targeted training and awareness campaigns to specific business units based on the findings.

We also delivered a targeted modern slavery training session for the Procurement team during the reporting period. This training focused on key modern slavery risks relevant to the Procurement team and strategies for risk identification, mitigation and management using our new technology enabled due diligence platform (see page 18 for additional information on the due diligence platform). We also conducted a targeted training session with our Enterprise, Wholesale and Government bidding team. The session provided an overview of modern slavery, TPG Telecom's approach to managing modern slavery risks, and introduced a refined modern slavery guidance document designed to support the team in effectively responding to modern slavery related questions in bids. A key element of our targeted training strategy was the integration of modern slavery scenarios into our business continuity exercises. A strategic briefing was also provided to the TPG Telecom Board covering TPG's legal reporting obligations and potential changes following the review of the MSA.

Awareness

We believe a crucial aspect of our response to modern slavery is keeping our people informed and aware of how to recognise the signs, report instances, and stay updated on the evolving landscape of modern slavery.

Throughout the reporting period, we launched several modern slavery awareness campaigns through our internal channels. These campaigns included an informative video from our Legal and External Affairs Executive, providing an update on the submission of our 2023 Modern Slavery Statement, highlighting our progress, and reinforcing key messages on identifying the signs of modern slavery and how to report concerns.

To further increase awareness and foster discussions about human rights, TPG Telecom actively participated in Anti-Slavery Awareness Week. Employees were encouraged to familiarise themselves with the signs of modern slavery and information about our reporting mechanisms were shared across internal channels. Key messages were also displayed on office screens, ensuring that key resources were highly visible and readily accessible.

In 2025, we plan to implement an annual modern slavery communication strategy designed to enhance awareness and engagement across our organisation. This strategy will focus on highlighting key dates, such as Anti-Slavery Awareness Week, to raise awareness and encourage participation in activities and discussions.

Through a combination of targeted campaigns, informational resources, and interactive sessions, we aim to deepen our employee's understanding of modern slavery, its implications, and their role in addressing risks. This proactive approach will reinforce our commitment to eradicating modern slavery and promote a culture of awareness and responsibility across our organisation.

Grievance and Remediation Approach

Internal Policies and Procedures

We have a range of internal policies and procedures that guide our modern slavery grievance and remediation approach (see page 16 for an overview of relevant policies). During the reporting period, we launched our Modern Slavery Response Policy and Remediation Protocol, which set out clear guidelines for managing actual or potential cases of modern slavery. These resources emphasise a survivor-centred approach, prioritising individual well-being and helping ensure the best interests of affected stakeholders remain at the core of our decision-making process.

Our Whistleblower Policy and Speak Up Procedure clearly outline who can report concerns related to improper conduct such as modern slavery, how to do so, and the protections available, including the option to report anonymously. All employees are required to complete Respect in the Workplace Training which includes guidance on how to raise issues in the workplace.

Reporting Mechanisms

During the reporting period, we undertook work to improve the channels for reporting modern slavery concerns to make them more accessible and user-friendly. TPG Telecom employees can now easily report issues through the internal modern slavery notification form available on the intranet. Additionally, our new speak up platform, Whispli, available to internal and external stakeholders, offers the flexibility to report concerns anonymously, empowering people to speak up with confidence.

Alternatively, our whistleblower hotline is also available for anonymous reports. Our whistleblower hotline extends to our suppliers, who are informed about their access and encouraged to use the channel through our Supplier Code of Conduct during onboarding.

Speak Up reporting during FY24

TPG Telecom conducted an internal investigation during the reporting period in response to a generalised anonymous concern raised in relation to two of TPG Telecom's multinational suppliers, however the investigation concluded there was no instance of modern slavery in respect of the services being provided to TPG Telecom by either supplier. No specific instances or other allegations of modern slavery were raised during the reporting period.

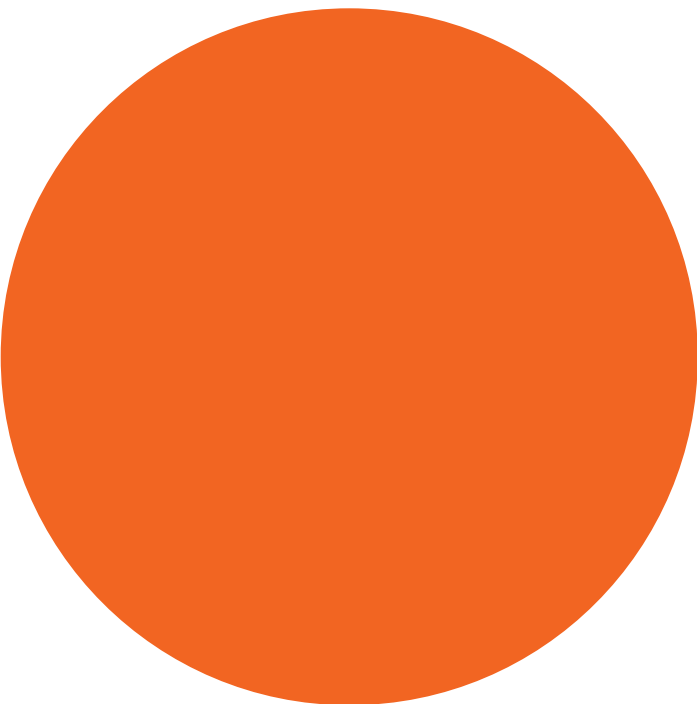**CASE STUDY**

Strengthening our Speak Up Mechanisms

During the reporting period, TPG Telecom strengthened our commitment to a safe, inclusive and respectful workplace by launching a new two-way reporting platform in partnership with Whispli. This platform simplifies and accelerates the process of reporting inappropriate behaviour, including a dedicated reporting option for human rights including modern slavery concerns. Stakeholders can choose to remain anonymous, fostering a culture of accountability and trust.

How it Works:

1 **Make a Report**
Individual selects anonymity preferences and answers guided questions to ensure accurate reporting

2 **Chat with a Case Manager**
A dedicated case manager initiates a secure two-way chat for further clarification and support

3 **Track Report Status**
Individuals can monitor progress and continue communication throughout the investigation.

Collaboration

Collaboration plays a key role in our response to modern slavery, as it fosters the sharing of knowledge, brings in diverse perspectives, combines resources, and enhances our collective ability to combat modern slavery more effectively.

Group	Overview	Engagement
INDUSTRY IMPACT HUB **An initiative of Telco Together Foundation**	• The Industry Impact Hub, an initiative by Telco Together Foundation, serves as a collaborative platform with the telecommunications industry focusing on addressing pressing social issues such as modern slavery. • Through collective efforts, it aims to raise awareness, drive change, and promote ethical practices across the industry.	• As members of the Telco Together Foundation, we actively participate in the Industry Impact Hub, and are signatories to the Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery. • In 2024, we continued to collaborate closely with the Telco Together Foundation and its members, meeting regularly to drive several initiatives including reviewing the priorities of the Industry Impact Hub, with a focus on deeper supplier engagement, including the development of a Modern Slavery Pathway Document. This practical guide is designed to help suppliers identify and address human rights risks in their supply chains, moving from theory to action.
GSMA™ **Global System for Mobile Communications Association (GSMA)**	• Established in 1995, GSMA brings together more than 750 global operators and approximately 400 companies in the broader mobile ecosystem. • A key aspect of GSMA's mission is to contribute positively to global development, address societal challenges, and improve the lives of individuals and communities globally.	• As members, we continued to actively engage with the GSMA, leveraging their industry-focused expertise to inform our broader sustainability strategy, which encompassed human rights issues. • Through our involvement with the GSMA, we have established connections with a human rights specialist in the telecommunication sector in the United Kingdom. We meet regularly to share challenges and insights, aiming to improve our strategies for combating modern slavery.
PILLAR TWO **Pillar Two**	• Pillar Two is a specialist business and human rights advisory firm that supports business to respect human rights using a principled, integrated and practical approach. • Pillar Two provides expert guidance on responsible business conduct, aligning with international human rights frameworks such as the UNGPs.	• During the reporting period we engaged with Pillar Two to finalise the modern slavery 'Hot Spot' analysis of direct suppliers. Pillar Two also supported the development of this statement by conducting a review of statement content.

During the reporting period, we maintained our efforts to monitor and report on the effectiveness of our Modern Slavery Framework through targeted KPI's.
The table below highlights the key elements of our effectiveness framework.

Pillar	Key component	How we assess our effectiveness	2024 Outcomes
Leadership	Oversee the implementation of the modern slavery program.	• Periodic reviews of our modern slavery program, governance structure and committee effectiveness.	• The endorsement of our Three-year Modern Slavery Roadmap by the Executive Leadership Team, Audit and Risk Committee and the Board. • Provided a strategic briefing to the TPG Telecom Board covering TPG's legal reporting obligations and potential changes following the review of the MSA. • Implementation of enhanced Human Rights and Modern Slavery Committee reporting on KPIs and progress against our initiatives. • Engaged a specialist business and human rights advisory firm to review our Modern Slavery Reporting and recommend areas for improvement.
Risk Management	Identify and manage modern slavery risks in operations and supply chain.	• Monitoring the number of suppliers assessed through our risk management framework. • Assessing the effectiveness of the Third-Party Due Diligence Program. • Analysis of risk and control review outcomes in key risk areas. • Undertake an annual modern slavery risk assessment across the operation.	• Implementation of a technology enabled Third-party due diligence program. • Engaged a specialist business and human rights advisory firm to undertake a modern slavery 'Hot Spot' analysis of TPG Telecom's direct suppliers. • Key learnings from the 'Hot spot' analysis to support identifying levels of risks associated with our Tier 1 suppliers. • Conducted a review of our modern slavery obligations and requirements to identify any controls requiring further enhancement. • Refined our Third-Party Risk Management Policy.
Capability	Adopt strategies for addressing modern slavery.	• Monitoring of Modern Slavery Training completion rates. • Considering feedback from our employees on our training program to identify opportunities for improvement. • Periodically reviewing our training material and relevant policies to ensure they are fit for purpose.	• Reviewed and updated our Modern Slavery e-Learning Module. • Developed a new refresher module, that provides key insights into employees understanding of modern slavery risks through assessing knowledge. • Participant feedback from tailored training sessions were used to uplift and design new training materials. • Designed and implemented our modern slavery communication and capability plan.
Performance	Monitor and review the effectiveness of the modern slavery program.	• Regular reporting and review of progress against the Modern Slavery Roadmap. • Monitoring of our "Speak Up" reporting mechanism for any complaints or concerns related to modern slavery or labour exploitation more broadly.	• Implemented enhanced Human Rights and Modern Slavery Committee reporting on KPI's and progress against our roadmap initiatives. • Implemented a new grievance mechanism that can be used to report concerns relating to modern slavery. • Implemented TPG Telecom's Modern Slavery Response Policy and Internal Modern Slavery Notification Form to guide the investigation of any actual or potential instances of modern slavery. • Refined our Third-Party Risk Management Policy.
Collaboration	Actively participate in industry initiatives to combat modern slavery.	• Benchmarking of peers and leading organisations to enable improvement of our own Modern Slavery Roadmap.	• Continued to participate in all monthly Telco Together Foundation Modern slavery meetings, with a focus on continually driving improvements in our industry. • Met with the NSW Anti-slavery Commissioner to discuss industry-wide initiatives in combatting modern slavery. • Worked with the Telco Together Foundation, Edge Impact and industry peers to design a supplier pathway document.

5. **Assessing effectiveness**

Appendix 1

MSA criteria

The table below indicates aspects of our statement which relate specifically to the mandatory criteria for modern slavery statements in the MSA.

MSA criteria	Relevant sections of our statement
Identify the reporting entity.	About this statement – page 2
Describe the structure, operations and supply chains of the reporting entity.	Our structure, operations and supply chains – page 6
Describe 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.	Modern slavery risks in our operations and supply chain – page 10
Describe 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.	2024 Highlights – page 4 Addressing modern slavery risks – page 13
Describe how the reporting entity assesses the effectiveness of the actions it takes to assess and address its modern slavery risks.	Assessing effectiveness – page 22
Describe the process of consultation with any entities that the reporting entity owns or controls and, for joint statements, the entity giving the statement.	About this statement – page 2
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Message from the CEO – page 3 Looking ahead – page 15