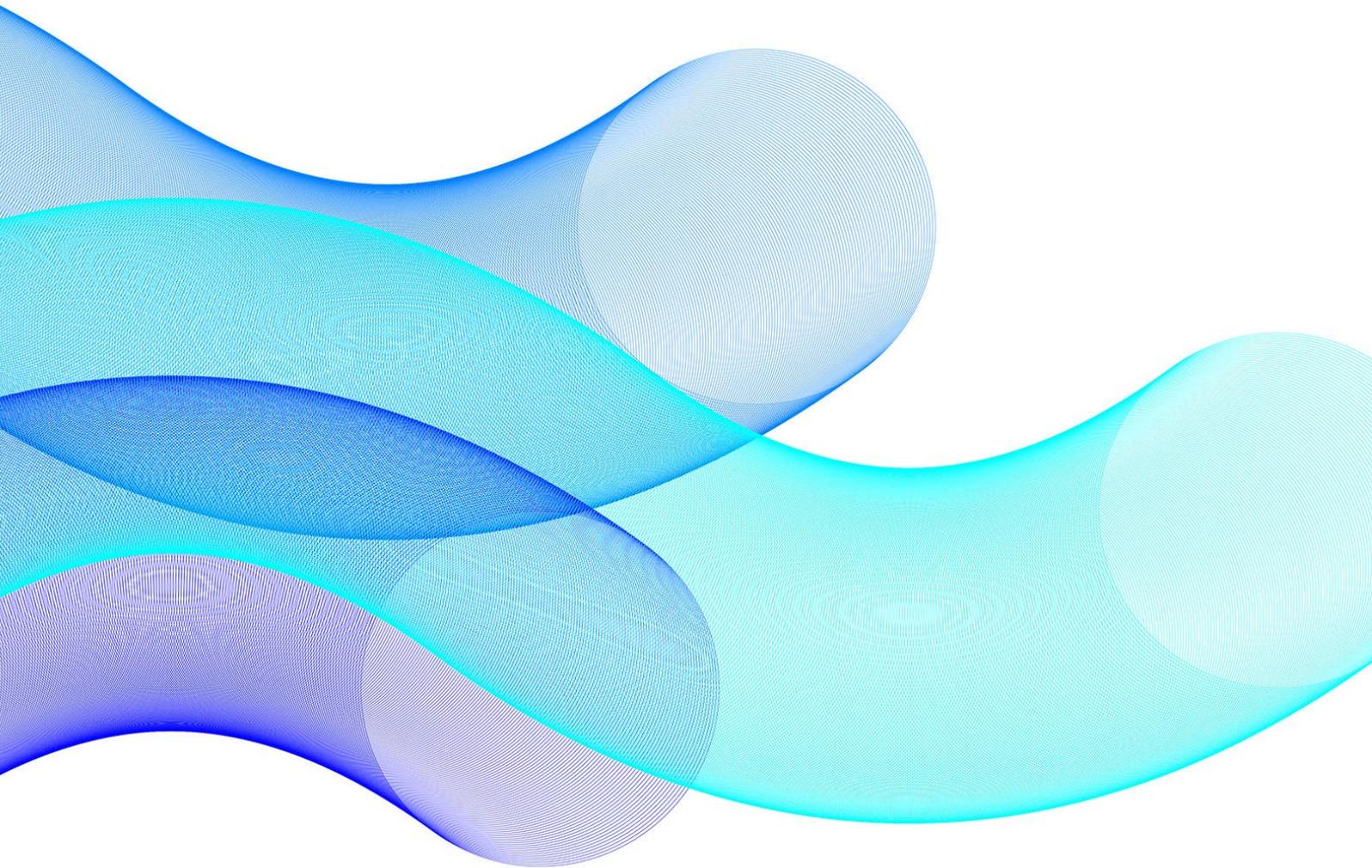

Modern Slavery Report

Vocus Group Limited

Financial Year Ended 30 June 2020



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Introduction

Vocus Group Limited is a reporting entity as defined by the Modern Slavery Act 2018 (Cth).

This is our first Modern Slavery Report and has been prepared in respect of the year 1 July 2019 to 30 June 2020. We have not sought external assurance over this report.

This and our annual Sustainability reports can be found at:

<https://www.vocus.com.au/about-vocus/sustainability>

Our structure, operations and supply chain

This statement covers Vocus Group Ltd (the ultimate parent company in the Vocus Group), and each of its subsidiaries within the Vocus Group. A complete list of the entities in the Vocus Group as at 30 June 2020 is available in the Vocus Annual Report, a copy of which is available at www.vocusgroup.com.au/investors

We are proud to have built a world class telecommunications infrastructure platform across Australia, New Zealand and Asia to support the rapid growth in demand for increasingly resilient, secure and reliable network connectivity. Our specialist fibre network connects Australian capital mainland cities with Asia and Auckland, stretching across the Tasman and connecting north and south islands of New Zealand, and to the United States, Singapore, Indonesia and Hong Kong.

We are Australia's fourth largest telecommunications provider and New Zealand's third largest by revenue. Vocus is listed on the Australian Securities Exchange under the symbol VOC and is headquartered in Melbourne.

Through our retail brand "Dodo", we also supply electricity to residential and small to medium business. The electricity we supply customers is sourced from the grid via the Australian Electricity Market Operator, and our gas for supply to customers is purchased from upstream suppliers; we do not own any generation or distribution assets.

Details of our financial position and performance are included in our FY20 Annual Report at: <https://vocusgroup.com.au/investors/company-performance/annual-reports/>

There have been no significant changes to our organisation or its supply chain during FY20.

- We own and operate a circ. 30,000km fibre network that is purpose-built and managed for business and government.
- We also have on-net access to over 5,500 buildings in Australia
- Our fibre optic network connects to 17 major sports stadiums
- We own and operate 4,200km of inter capital fibre network in NZ
- We operate 13 purpose-built Data Centres across Australia and New Zealand in addition to having Points of Presence in over 65 third party Data Centres.
- More than 1,800 team members in Australia and New Zealand
- More than 1,200 team members in the Philippines, employed through a business process outsourcing partner

Vocus operates across all states and territories of Australia and across the North and South Islands of New Zealand.

Our primary go-to-market brands and services are shown in the following table.

	Retail	Vocus Network Services
Brands	Australia: Commander, Dodo, iPrimus New Zealand: Slingshot, Flip, Switch, Orcon, Stuff	Australia: Vocus New Zealand: Vocus, 2Talk

Our policies and governance framework

Vocus has established a comprehensive framework of Corporate Governance policies that apply to all directors, executives and team members of the Vocus Group. The policies that are of particular relevance to Modern Slavery are our Code of Conduct and our Whistleblower Policy, which have been established to maintain integrity and confidence in Vocus and appropriately safeguard the reasonable expectations of Vocus' shareholders and other stakeholders.

Vocus has defined and launched a new set of "Team Values", with 90 workshops being held over a period of 6 months with over 1,000 participants to embed our values and define how they apply to individual teams. Values now form part of our new starter induction. All Vocus employees are responsible for knowing and following our policies and governance frameworks, and to follow our core organizational values.

Our 2020 Corporate Governance and Sustainability reports provides full details of our approach to Modern Slavery and Sustainability and can be found at the following links:

<https://www.vocus.com.au/legal/corporate-governance>

<https://www.vocus.com.au/about-vocus/sustainability>

We recognise that the indirect delivery through upstream suppliers carries a higher risk for workers who are not directly employed or engaged by Vocus. To mitigate this, we have implemented a range of procedures and programs to ensure the high labour management standards we expect are being met. All suppliers are now required to agree to specific contractual arrangements with regards to compliance with the Modern Slavery Act as part of our standard agreement and onboarding process for new suppliers.

Due diligence and risk management

We have undertaken due diligence in respect of Modern Slavery risks in our supply chain as a joint effort between our Australian procurement, risk and legal teams.

The steps in our due diligence process included:

- Mapping out the Vocus Group operations and supply chain;
- Educating relevant team members on the new Modern Slavery obligations, the importance of and our plan to achieve compliance;
- Risk assessment, where we identified the areas of greatest perceived risk of Modern Slavery breaches in our supply chain. Factors considered during this process were whether the entity was providing goods or services, whether goods or services provided were manufactured or supplied in Australia or overseas, and known reputational risks or adverse publicity in respect of particular suppliers;
- Following the risk assessment, we then selected a sample of higher risk-rated suppliers for further investigation. Those suppliers were then asked to complete a Modern Slavery self-assessment

questionnaire. Results were reviewed by our Procurement team in consultation with the risk and legal teams.

Following the due diligence process described above and completed on a sample of 8 suppliers, we did not identify in FY20 any instances of modern slavery in our operations or supply chain. However, we consider this to be the commencement of a rolling programme of due diligence and plan to extend the number of suppliers included in the assessment programme over subsequent years.

We have also included clauses outlining the requirement to comply with the Modern Slavery Act as part of our standard agreement and onboarding process for new suppliers, as part of our Supplier governance framework.

Whistleblower Policy

Vocus has established a Whistleblower Policy which is published at the following link:
<https://www.vocus.com.au/legal/corporate-governance>

Eligible Whistleblowers are afforded confidentiality and protection from detriment by the Whistleblower Policy. Vocus contractors and suppliers, and employees of Vocus contractors or suppliers, are defined as Eligible Whistleblowers. Accordingly, genuine concerns about unethical conduct within the Vocus supply chain may be reported under the Whistleblower policy, if other avenues are not successful.

During FY20 no whistleblower reports were received in respect of Modern Slavery issues.

Franchise Network

Vocus operates a small number of shopping centre kiosks which are used to promote the Dodo brand. Some kiosks are operated by Vocus employees, whilst other locations are operated by a franchisee.

As a result of COVID-related trading restrictions, a number of these kiosks closed during the year and at the date of this report there are 5 franchised kiosks currently operating.

Franchised kiosks have been identified as an area of potential Modern Slavery risk. The franchisee is responsible for processing payroll and rostering and does not have the same degree of oversight as compared to staff employed direct by Vocus. To mitigate this risk, we require franchisees to use a third-party payroll programme which is then subject to review by Vocus staff to ensure that pay rates and rostering are compliant with the relevant awards, and consistent with our knowledge of kiosk staffing patterns and timesheets.

Looking Forward

Vocus is a member of the Telco Together Foundation (“TTF”). TTF is a charity that brings together the telecommunications industry in support of disadvantaged communities.

Vocus has joined a Modern Slavery working group facilitated by TTF. Through the working group we anticipate that, during FY21, we will collaborate with our industry peers to implement a consistent screening programme across our supply chains. This collaborative approach will support the identification of modern slavery risks, foster efforts between suppliers and organisations to address those risks, improve transparency and identify areas for further due diligence.

In FY21, we also plan to investigate a tool to audit and follow up supplier screening questionnaires. In light of current travel restrictions due to the COVID-19 pandemic, in person audits may not be possible for some time.

We will share more information about the working group's activities in our next Modern Slavery report for the year ending 30 June 2021.

In the longer term we plan to develop performance indicators in respect of Modern Slavery risks. Whilst there is currently no fundamental units of measurement or international standards for measuring human rights impact, we will monitor developments and continue to consider the suitable performance measure may be, either alone or jointly with the TTF working group.

Approval

This Modern Slavery Statement was approved by the Board of Directors on 30th November 2020 and is signed on its behalf by the Managing Director and Chief Executive Officer, and Board Chairman



Mr. Kevin Russell
Managing Director and Chief Executive Officer



Mr. Bob Mansfield AO
Chairman