tpg TELECOM

Modern Slavery Statement 2023

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 5 of this statement (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 2023 statement for the financial year ending 31 December 2023 (**reporting period**). Information provided in this statement is correct as at 31 December 2023.

Consultation

This statement was prepared by the TPG Telecom Group Human Rights and Modern Slavery Committee, which includes senior managers from relevant functions across the TPG Telecom Group, such as Risk, Compliance, Sustainability, People Experience, Procurement and Legal. Further information on the governance structure for oversight of modern slavery risk management is outlined on page 13 of this statement. The Human Rights and Modern Slavery Committee members contributed to and reviewed drafts of this statement.

The statement was developed through engagement and consultation by the Human Rights and Modern Slavery Committee members with business functions covering the entities owned or controlled by TPG Telecom Limited. 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 and the Audit and Risk Committee.

The respective Company Secretary or Public Officer, as a representative of each reporting entity, were 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 27th June 2024 and is signed by the responsible member, the CEO and Managing Director of TPG Telecom Limited. *Appendix 1* details how our statement has complied with the mandatory reporting criteria for statements, as set out in the MSA.

Contents

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, present, and emerging.

01
Overview

2023 Highlights

Our statement outlines the key actions undertaken during the reporting period, building upon the foundational elements laid out in our previous statement.

Worked with a specialist business and human rights advisory firm to assist us in revising and updating our three-year **Modern Slavery Roadmap** which outlines clear organisational goals, foundational principles and practical actions to encourage a whole-of-company response. See page 14.

Continued to collaborate across our industry on modern slavery-related issues and initiatives, including with the Telco Together Foundation. See page 20.

Continued awareness of modern slavery risks through practical guidance material, **tailored modern slavery training** and the roll out of our online training module to our dealer network. See page 19.

Continued the development of a technology-driven Third-Party Due Diligence Program. See page 18.

Engaged a specialist business and human rights advisory firm to conduct a **modern slavery 'Hot Spot' analysis** to identify our highest risk procurement categories, which we intend to use to conduct a deeper analysis of targeted suppliers and address potential risks of modern slavery in our supply chain. See page 11.

Message from the CEO and Managing Director

> **TPG Telecom is dedicated to upholding the highest standards of ethical conduct and human rights.**

We know from the Global Slavery Index's latest estimates that there are 50 million people living in situations of modern slavery around the world. We condemn all forms of modern slavery and remain dedicated to addressing it through our supply chain and partnerships, aiming to use our influence to drive positive change.

Our 2023 Modern Slavery Statement reflects this ongoing commitment, as we continue to identify, mitigate, and address modern slavery risks in our operations and supply chain while continuing to look for opportunities to improve our approach.

We have built upon the foundations established in 2022 and taken important steps in addressing modern slavery risks within our operations and supply chain. These efforts have focused on key initiatives aimed at enhancing awareness, strengthening supplier due diligence processes and fostering collaboration both internally and within our industry.

We have made solid progress in developing our technology-driven Third-Party Due Diligence Program. This program will deliver a step change in our ability to identify and mitigate potential risks of modern slavery within our supply chain.

We have also engaged an external specialist business and human rights advisory firm to assist us in revising and updating our three-year Modern Slavery Roadmap. This has helped us refine our organisational goals and enhance our understanding of modern slavery risks, driving a comprehensive response across the company.

In addition to these initiatives, we have prioritised raising awareness of modern slavery risks among our staff through specialised training and communication channels. By providing practical guidance and support, we aim to empower our employees to recognise and address potential instances of modern slavery in their day-to-day activities.

Our efforts to listen to others while also expanding our influence has continued through close collaboration with our industry peers including the Telco Together Foundation.

It is our view by working together and sharing best practices, we can make a meaningful impact and drive positive change within the telecommunications industry and beyond in combatting all forms of modern slavery.

I am pleased to sign and present this Statement, which was approved by the TPG Telecom Board on 27 June 2024, on behalf of the reporting entities.

Iñaki Berroeta
Chief Executive Officer and Managing Director
TPG Telecom Limited

June 2024

About TPG Telecom

Our structure

TPG Telecom Limited is the ultimate parent company in the TPG Telecom Group and the immediate parent of TPG Corporation Limited. TPG Corporation Limited, a reporting entity for the purposes of the MSA, is 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;
TPG Telecom Limited ACN 096 304 620; and
Vision Network Pty Limited ACN 087 533 328.

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 approach

Our Sustainability Strategy outlines how we will operate our business responsibly, and make a difference for our customers, people and broader community, now and into the future.

Accordingly, our approach is centred on respecting all internationally recognised human rights, including a commitment to eradicating modern slavery. We take a principled, integrated and risk-based approach (understood through a risk to people lens) to managing modern slavery and human rights risks in our operations and supply chain. Backed by a culture of continuous improvement, we also seek to actively collaborate with external organisations and industry peers to collectively address and combat modern slavery.

More information about the TPG Telecom Group, including our structure, purpose and sustainability strategy is available on our website: www.tpgtelecom.com.au.

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.

Stand together
Together we are unstoppable.

Own it
We step up and own what we do.

Simple's better
We challenge ourselves to find a simpler, fresher way.

Boldly go
We are hungry, curious and brave.

02

Our structure, operations and supply chain

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.

Our services

We provide services to domestic and international end users such as retail, enterprise, and government. We also provide wholesale services to other service providers, network providers, content providers and several mobile virtual network operators. Our mobile network comprises of more than 5,700 sites, over half of which are now 5G-enabled. The 5G network covers over 98 percent of the population in 12 of Australia's biggest cities and centres (Sydney, Melbourne, Brisbane, Adelaide, Perth, Canberra, Darwin, Hobart, Gold Coast, Sunshine Coast, Wollongong, and NSW Central Coast). We have approximately 35,000 km of metropolitan, inter-capital, and subsea cable systems.

Customers (000S)	2022	2023
Total mobile	5,281	5,456
Total fixed broadband	2,218	2,127
Total subscriptions	**7,499**	**7,583**

As at 31 December 2023.

TPG at a Glance
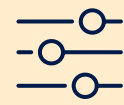
~35,000km

Metropolitan, inter-capital and subsea cable systems

~6,000[1]

Employees located in across Australia, Fiji, Guam, and the Philippines

~7.5+ milllion

Mobile and Fixed broadband subscribers

5G mobile network

Reaches 98% of the population in 12 of Australia's largest cities and regions

Mobile Network
Our Mobile network covers over 22 million Australians with a leading network comprising of more than 5,700 sites.

Contact centres
We operate a contact centre in the Philippines[1] and are also supported by outsourced contact centres in India, Philippines, South Africa, 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 over 150 stores operated by approximately 8 Dealer groups.

1. 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.
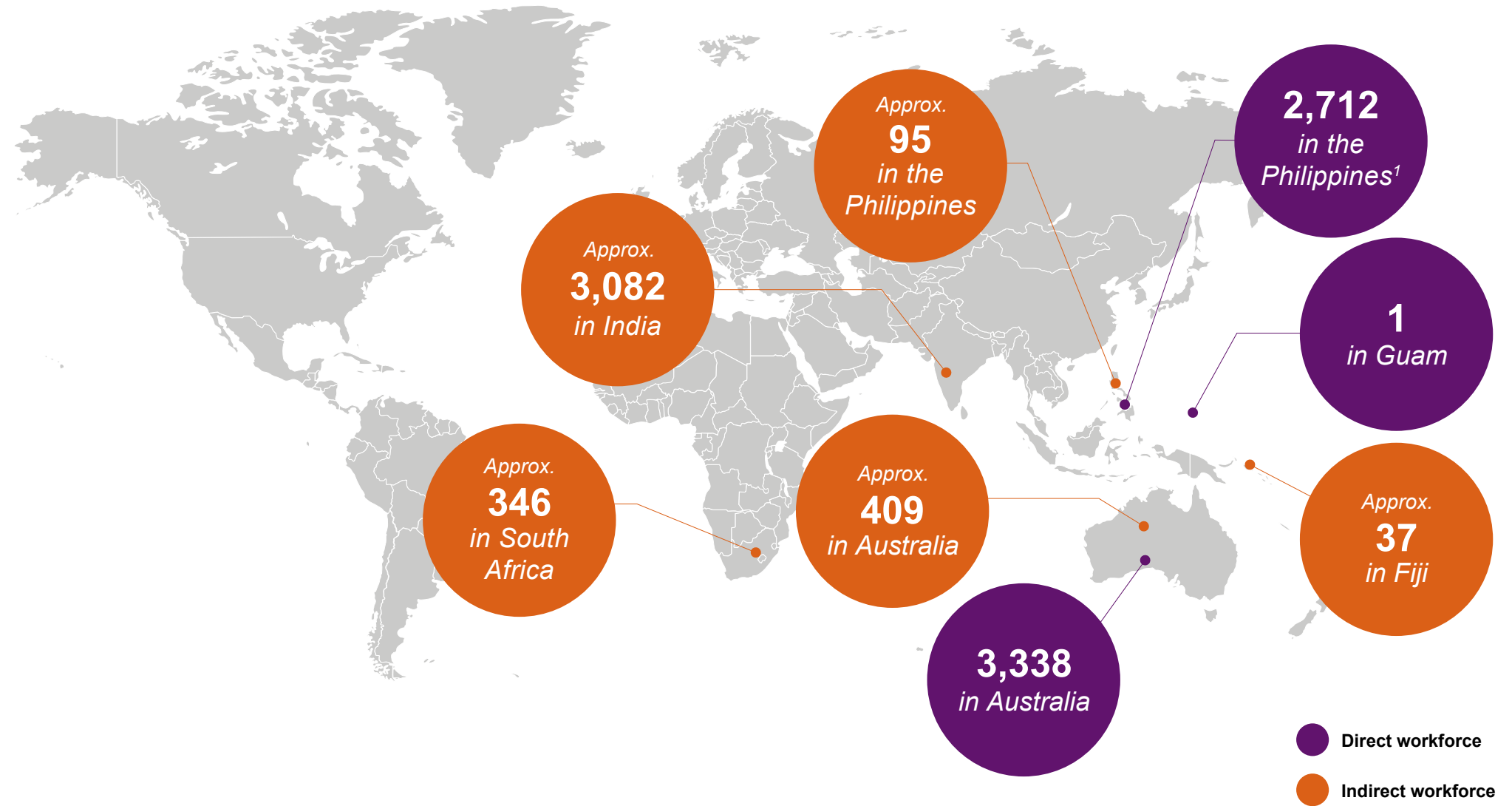
Our workforce

As at the end of 2023, TPG Telecom had 6,051 employees across Australia, Guam, and the Philippines[1]. 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 of staff on a casual basis, on fixed-term contracts and through working visas.

Employees	Total
Full time	5,453
Part time	496
Casual	33
Fixed term contractor	69
Total	**6,051**

Based on headcount as of 31 December 2023.

Approx. **95** in the Philippines

2,712 in the Philippines[1]

Approx. **3,082** in India

1 in Guam

Approx. **346** in South Africa

Approx. **409** in Australia

Approx. **37** in Fiji

3,338 in Australia

● Direct workforce
● Indirect workforce

1. 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.

Our supply chain

TPG Telecom procures 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

94%

MORE THAN

1400

TOTAL SUPPLIERS

THE TOP 100 SUPPLIERS ACCOUNT FOR

93%

OF OUR TOTAL SPEND

We have a large supplier base which ranges from strategic partnerships with multinational firms to relationships with small and medium enterprises. The services we procure are mainly based in Australia, India and South Africa while goods that we purchase are manufactured by our direct suppliers based in Australia and overseas.

While the vast majority of our procurement spend is with vendors based in Australia, we acknowledge our direct suppliers often have offshore manufacturing operations and their own tiers of domestic and international suppliers. This results in a deep, complex supply chain that comprises many tiers. We acknowledge the challenges around gaining visibility of these tiers and are committed to building our understanding of our supply chain.

TPG Telecom Suppliers

1% 2% 3%

94%

- Australia & NZ
- US & Canada
- UK & Europe
- Asia
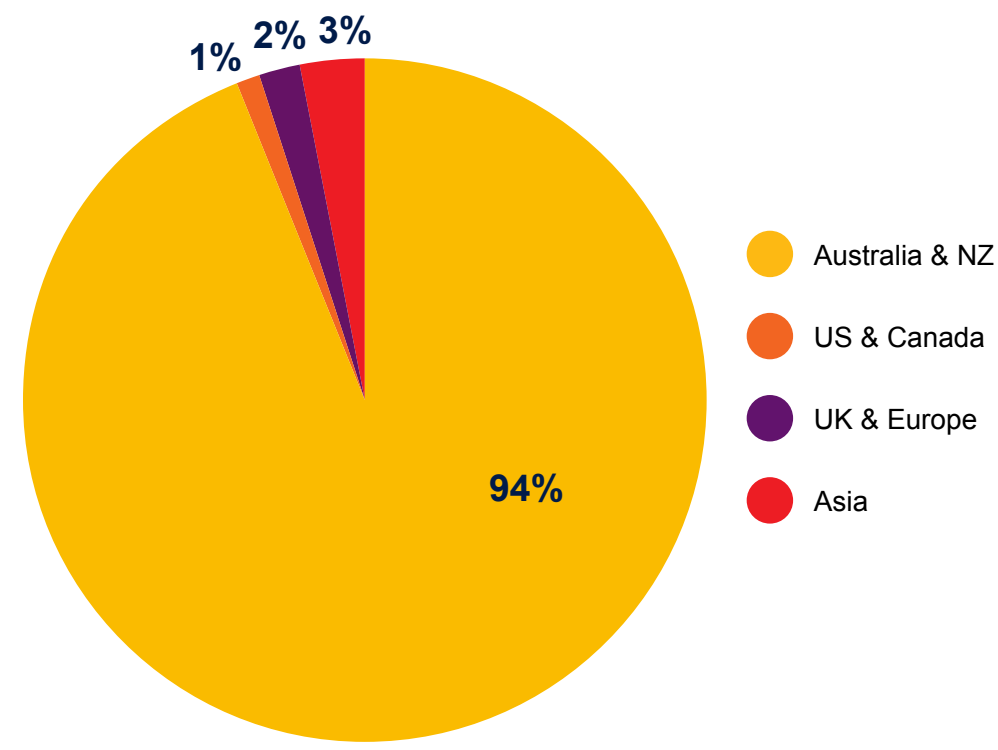
91%[2] of our procurement spend is allocated to the following six categories of goods and services:

01 **Mobile Devices**

04 **Corporate Services**

02 **Intercarrier**

05 **Professional Services**

03 **Network & Equipment**

06 **Information Technology**

2. In 2023, TPG Telecom implemented a new financial management system and the above data is limited to the period 22 August 2023 to 31 December 2023.

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Modern slavery risks in our operations and supply chain

The telecommunications industry operates in a highly complex environment, which includes evolving regulation, technological advances, challenging geopolitical, societal & macroeconomic factors. The dynamic nature of operating conditions may expose our sector/industry to modern slavery risks.

With supply chains spanning the globe, our operations carry significant influence over various aspects of the environment, economy, and society. From the extraction of raw materials for manufacturing to the disposal of electronic waste, every step in our supply chain leaves a footprint.

In order to effectively serve our customers and stay competitive, we rely on a network of partnerships with diverse service providers, associates and vendors. These partnerships enable us to deliver innovative solutions and seamless experiences to our customers. However, the interconnected nature of these relationships also exposes us to risks, including those related to human rights such as modern slavery.

Whether through our own operations or those of our suppliers, the potential for exploitation of vulnerable workers exists, particularly in regions where regulatory oversight may be lacking or where labour practices are less scrutinised. These risks highlight the importance of diligent oversight and proactive measures to ensure our business practices uphold our ethical values and principles.

Understanding our relationship to modern slavery risks

The UN Guiding Principles on Business and Human Rights (**UNGPs**) are the authoritative global standard for preventing and addressing human rights impacts by business. The UNGPs 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'.[3]

UNGP's Continuum of Involvement

Cause
A company may cause modern slavery where its direct actions or ommissions result in modern slavery occuring.

Contribute
A company may contribute to modern slavery where its business activities facilitate modern slavery occuring.

Directly Linked
A company may be directly linked to modern slavery where it is connected to modern slavery practices through the activities of actors in its supply chains.

At TPG Telecom, we are committed to aligning our approach to human rights including modern slavery with the UN Declaration on the Rights of Indigenous Peoples, the OECD Guidelines for Multinational Enterprises and UNGPs.

In line with the UNGPs, our modern slavery risk management process prioritises assessing risks to people over risks to achieving our business objectives.

We also understand that we may cause, contribute, or be directly linked to modern slavery through our operations and supply chain. Potential scenarios include:

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

Work is currently underway to better understand our level of impact in line with the UNGP's expectations, refer to the Hot Spot analysis on page 11 for further details.

3. 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

As part of our ongoing commitment to identifying and addressing modern slavery risks, we continue to examine potential areas of risk within our operations. In 2023, we conducted a Modern Slavery Risk Assessment focused on the TPG Telecom indirect workforce and offshore operations control environment. The risk assessment considered sector and industry risks, product and services risks, geographic risks and entity risks. The risk assessment assisted us to identify the areas within our operations and supply chain with a higher potential risk of modern slavery.

Areas of potential risk	Potential modern slavery risk factors
Direct workforce inside Australia Approx 3,338 employees are based in Australia. **Direct workforce outside Australia (e.g. Contact centres and services support).** Approx 2,713 employees are based in the Philippines[4] and Guam.	**Outside Australia** • Operations based in regions with reported higher risk of modern slavery or labour rights violations. • Use of unskilled, temporary, migrant or seasonal labour. • Limited visibility and control over the working conditions. • Differing degrees of legal / regulatory protections. • Possible use of labour hire providers and workers forced to pay recruitment fees.
Indirect workforce inside Australia Approx 409 employees are based in Australia. **Indirect workforce outside Australia (e.g. Contact centres and services support).** Approx 3,560 employees are based in the Philippines, India, Fiji and South Africa.	

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

Identifying our modern slavery risks

Identify	Analyse	Evaluate	Treat
Find key risk areas in our operations and supply chain	Develop an understanding of the severity and likelihood of risk	Support decisions on how to manage risk	Implement an action plan for addressing the risk

TPG Telecom's Modern Slavery Risk Management Process

Modern Slavery Hot Spot Analysis

During the reporting period, we engaged a business and human rights advisory firm to undertake a modern slavery 'Hot Spot' analysis of TPG Telecom's direct suppliers. This external analysis involves conducting an assessment of our Tier 1 suppliers to identify key areas of modern slavery risk present in our supply chain. Whilst this analysis is still underway, early indications of key hot spots in our supply chain, which align with our previous internal analysis, are outlined on page 12 - Modern slavery risks in our supply chain.

This exercise will provide us with an evidence base to utilise as we plan to conduct more targeted supplier risk management in the future. We will report on the findings from the external Hot Spot analysis and next steps in our 2024 statement.

Modern slavery risks in our supply chain

TPG Telecom continually assesses supply chain risks, acknowledging their evolution in tandem with shifts in our business model and product profile. We draw on the UNGPs continuum of involvement in understanding our relationship to risks. Our assessment indicates a potential direct linkage risk to modern slavery impacts through our business relationships, rather than direct causation or contribution. However, we acknowledge the risk of causing or contributing to modern slavery and recognise the importance of implementing effective risk management controls.

Risk areas below have been informed by indicative learnings from the modern slavery Hot Spot analysis. We acknowledge the likelihood of modern slavery risks present beyond our direct suppliers and the challenges associated with identifying modern slavery risks deeper in our complex global supply chain. As we deepen our understanding of risks amongst our Tier 1 suppliers through the external Hot Spot analysis, we will seek to work with these suppliers to better understand their supply chains and the associated modern slavery risks.

Areas of potential risk	Modern slavery risk factors
IT equipment Handsets, modems and wearable computing devices	• Complex and multi-level supply chains with some manufacturing operations based in countries with reported higher modern slavery risks.[5] • Risk of use of raw materials and minerals from countries with reported modern slavery risks. • May involve low-skilled, low-wage labour and potentially vulnerable workers.
Network equipment Products to maintain and operate the network. E.g. Radio Access Equipment, Communications and Equipment Manufacturing	• Produced in countries reported to be of higher modern slavery risk. • Manufacturing may involve low-skilled, low-wage labour and potentially vulnerable workers (e.g. migrant workers). • Complex supply chain, with risk of limited visibility into lower-tier suppliers.
Construction works Physical works to build and maintain the network infrastructure	• Risk of reliance on short-term contracts, outsourcing and labour hire providers. • May involve reported reliance on lower-skilled workers and migrant workers.
Carbon offsets Partners and providers of carbon offset credits undertaking reforestation projects	• Reforestation projects taking place in remote sites and countries reported to be of higher-risk of modern slavery and human rights violations more broadly. • May involve the use of low-skilled, low-wage labour and potentially vulnerable workers.

Areas of potential risk	Modern slavery risk factors
Stationery and print Marketing print services, promotional and advertising printing, office consumables	• Raw materials are produced and manufactured in reported high-risk countries where labour and broader human rights protections may be more limited. • Processing and packaging may utilise sub-contractors with low-skilled, low-wage labour and potentially vulnerable workers. • Extensive and complex supply chains.
Uniforms	• Raw materials produced and manufactured in countries of potentially higher risk of modern slavery and human rights violations more broadly. • May involve low-skilled, low-wage labour and potentially vulnerable workers.
Facilities services and management	• Risk of reliance on temporary, contract labour and labour hire providers. • May involve low-skilled, low-wage labour and potentially vulnerable workers (e.g. migrant workers).
Logistics Road transport, couriers and warehousing	• May involve low-skilled, low-wage labour and potentially vulnerable workers. • Risk of hazardous work and poor workplace health and safety practices, such as long shifts with tight schedules for drivers.

5. Global Slavery Index - Australia www.walkfree.org.

04

Addressing modern slavery risks

We understand the importance of taking meaningful action to manage potential modern slavery risks across our operations and supply chain. Accordingly, continuous improvement, collaboration, and accountability is central to our approach to modern slavery, and we aim to be transparent about our framework, objectives and progress.

Governance

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 progress on modern slavery has been driven through a dedicated Human Rights and Modern Slavery Committee (the **Committee**), led by the Head of Compliance with representation from Sustainability, People Experience, Procurement, Enterprise Risk, Legal and Compliance teams.

In 2023, the Committee met monthly and is responsible for ensuring TPG Telecom achieves its long-term plan for combatting modern slavery and implementing the required initiatives across TPG Telecom's operations in consultation with the various business units. The performance of this working group is overseen by the Executive Leadership Team (**ELT**).

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 modern slavery risk management and progress made to implement actions.

TPG Telecom Board of Directors

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

Audit & Risk Committee (ARC)

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

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.

Human Rights and Modern Slavery Committee

A cross functional management committee that is responsible for the implementation and management of TPG Telecom's commitments and initiatives relating to human rights and modern slavery.

| Enterprise Risk | Group Compliance | People Experience |
| Procurement | Sustainability | Legal |

Human Rights and Modern Slavery Committee Charter

In 2023 we continued to strengthen the Modern Slavery Framework by designing the Committee's Charter which clearly outlines the Committee's responsibilities, including:

- Aligning the human rights and modern slavery commitment and ambition to TPG Telecom's purpose, strategy, and objectives;
- Developing and overseeing the implementation of a comprehensive modern slavery strategy and program endorsed by the ELT;
- Raising awareness and compliance with all internal and external requirements, including the TPG Telecom Human Rights Policy, the MSA and other relevant laws and regulations in respect of human rights and modern slavery;
- Establishing appropriate structures, procedures and initiatives to support human rights and modern slavery requirements and commitments;
- Providing recommendations for ELT endorsement, if remediation or investment is required to meet TPG Telecom's objectives;
- Overseeing human rights and modern slavery risk; and
- Monitoring and reporting to the ELT, ARC and Board, as required, on the performance of the Committee and effectiveness of programs in place.

The Committee's responsibilities include designing and tracking relevant Key Performance Indicators (**KPIs**) to ensure implementation of the Modern Slavery program of work and progress of initiatives to continuously improve our management of modern slavery risks. The KPIs are outlined in the section on 'Assessing Effectiveness' at page 21.

Modern Slavery Framework

Our Modern Slavery Framework offers clear guidance and a comprehensive structure 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 continues improvement, collaboration, transparency and accountability in our efforts.

Modern Slavery Framework

The five pillars are foundational to measure and report on the effectiveness of our modern slavery response and progress.

Leadership
Oversee the Modern Slavery Framework and Implementation of Initiatives.

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.

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

Modern Slavery Roadmap

To support the Modern Slavery Framework, a staged Modern Slavery Roadmap and detailed action plan has been developed to:

- Align 'effort with impact' by focusing on **key opportunities for action**;
- Provide **practical and actionable recommendations** over different time horizons, allowing targeted actions to be implemented in a phased way;
- Address **key stakeholder expectations** for action in line with the UNGPs;
- Facilitate a **whole-of-company response** by identifying recommendations across all aspects of the business, including operations and supply chain.

Updating our Modern Slavery Roadmap

During the reporting period, we updated our Modern Slavery Roadmap to provide a refreshed and more focused set of tangible actions to support our modern slavery approach. This involved reviewing our current list of modern slavery initiatives to understand any potential gaps in our current approach and developing targeted actions to respond to these gaps.

The **Modern Slavery Roadmap** sets out a detailed three-stage plan for how TPG Telecom can practically enhance its modern slavery risk management approach. We will report on our progress in implementing the **Modern Slavery Roadmap** in future statements.
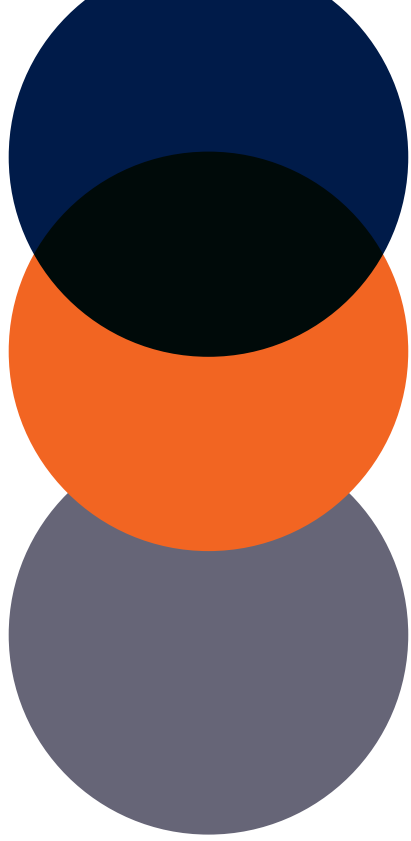
Goals

Developed in 2023, the goals guiding the Modern Slavery Roadmap provide clarity of purpose, ensuring alignment of efforts and resources towards multiple objectives. Additionally, they act as benchmarks for measuring progress, facilitating ongoing evaluation and improvement. By consistently revisiting the goals, the Modern Slavery Roadmap will adapt to changing circumstances and maintain relevance.

Ultimately, the goals drive the Program towards greater impact and success.
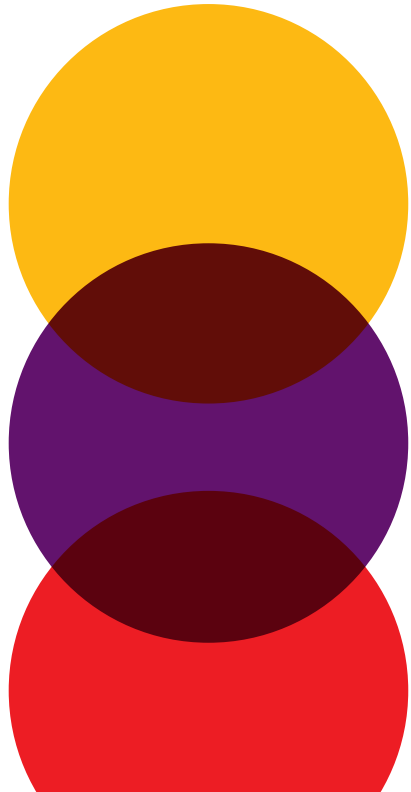
Develop and implement a people focused risk-based approach for detecting, evaluating and mitigating modern slavery risk throughout our operations and supply chain proportionate to our level of influence, our capacity and our risk profile.

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.

Policy framework

We have established a robust policy framework to effectively articulate and address our modern slavery risks while maintaining our commitment to human rights. Our policies define our operational approach, establish expectations for both our people, suppliers, and other business relationships, and outline our commitment to provide safe and accessible mechanisms for stakeholders to raise concerns related to human rights issues including modern slavery.

The way we conduct business is just as important as what we do and addressing modern slavery is integral in this. Building trust and fulfilling our purpose means taking care of our colleagues, customers, and community. Setting clear expectations and doing the right thing begins with each employee.

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, and suppliers of all entities controlled by TPG 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.
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.

Policy area	Description of policies and relevance to modern slavery	Implementation and communication
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, 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 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.
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 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

TPG Telecom aims to ensure that throughout our operations we respect the human rights of our employees and aim to partner with suppliers that respect their workers' rights and do not engage in modern slavery.

Managing our Direct Workforce

In our assessment our direct workforce based in Australia (3,338 employees) and Guam (1 employee) poses a minimal risk of modern slavery, a risk that is effectively mitigated by our current 'People' related processes and controls.

We recognise that certain jurisdictions and sectors may present a heightened risk of modern slavery practices. As at December 2023, with a direct workforce in the Philippines (2,712 employees), we had implemented various controls to enhance the identification and management of potential modern slavery risks. Details regarding controls are 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 WH&S 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.
Outside Australia Philippines and Guam: Employees based in contact centres and as well as field-based employees working in operations.	• In the Philippines, the Human Resources team centrally based reported directly to an Australian based Human Resources manager to ensure there was oversight as to pay and workplace conditions. • Australian based managers regularly visit the Philippines site and speak with the team. • We sought direct feedback from each employee twice a year in our engagement survey and acted upon any issues raised.

Managing our Indirect Workforce

Our business operating model includes the use of indirect workforce provided by our key service partners to deliver three main services outlined in the table below. The risk assessment on page 17 outlined the key risk factors relating to modern slavery in relation to our indirect workforce. While we have existing mitigations to manage risk, efforts in this area continue to evolve and strengthen.

Indirect Workforce	Our Response
Customer care Use of outsourced service providers with workers located in India, South Africa, Philippines and Fiji.	• Annual compliance programs are in place for outsourced contact centres including training, pulse checks, control reviews and audits.
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 monitor and report on Modern Slavery matters contract regular reviews and oversight governance forums are in place. • Employee compensation reviews are conducted including benchmarking review of salaries.
Dealers Use of partners to provide retail 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, as well as anti-modern slavery protections. • Quarterly Operational Reviews and Mystery Shopping Programs are in place. • Mandatory Modern Slavery Training rolled out in 2023.

SPOTLIGHT

Strengthening our supplier governance

We recognise the importance of robust supplier governance to support our efforts to identify, prevent and manage modern slavery risks. We have a centralised procurement function, underpinned by an organisation-wide procurement governance framework which embeds modern slavery-related considerations. We prioritise continuous improvement in our approach, supporting us to respond to modern slavery risks and opportunities present in our large, complex supply chain.

In 2023, we commissioned an independent review by an advisory firm of our existing third-party risk management practices resulting in a defined roadmap for improving maturity, commencing 2024. Third-Party risk assessments will incorporate heightened modern slavery risk consideration through improved supplier assessment tools. Modern Slavery risk will continue to be monitored leveraging a refreshed vendor governance framework. Our Roadmap will help us better manage risk in our supply chain and enable us to work with suppliers aligned with our sustainability goals.

As outlined on page 21, at the end of the reporting period we engaged a specialist business and human rights advisory firm to conduct a modern slavery hot spot analysis to better understand where key modern slavery risks are present amongst our direct suppliers.

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.

TPG Telecom acknowledges that customs, traditions, and practices vary across countries. However, we set clear expectations for our suppliers to comply with all relevant local and international laws. We also expect suppliers to adhere to the fundamental conventions and labour standards outlined by the International Labour Organisation (ILO).

Our expectations are documented in our standard terms and conditions, as well as our Supplier Code of Conduct, which is distributed to all suppliers. Additionally, our Procurement Terms & Conditions incorporate modern slavery clauses that 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.

Committed to ongoing improvement, in 2023, we reviewed and revised the Procurement-driven Supplier Due Diligence Program to ensure we meet the growing expectation of regulators, investors and community with regard to managing modern slavery risks in our supply chain. Through this, we made the decision to introduce a new risk-based IT solution to ensure our due diligence efforts are focused on identifying and managing higher risk suppliers. Our priority for 2024 is to embed our revised Procurement technology enabled program into the existing procurement process. Additional initiatives planned for 2024 are outlined in - '*Spotlight: Strengthening our Supplier Governance*'.

Training and awareness

Our Modern Slavery Awareness training module is readily accessible to all employees via our online learning platform, and completion is mandatory every two years. This module offers an overview of modern slavery, utilising industry-specific case studies from the telecommunications sector. It educates employees on how to identify modern slavery and provides guidance on the appropriate channels for reporting any identified instances.

As tabled below, we were able to deliver on our commitment to continue rolling out our Modern Slavery Awareness training module to our direct and indirect workforce. The table below outlines our progress as of 29 January 2024:

Country	Completion rate
Direct workforce	
TPG Telecom Australia[7]	91.5%
Orchid Cybertech Services Inc (OCSI) Philippines[8]	88.3%
Indirect workforce	
Mindpearl Fiji	100%
Tech Mahindra India	99%
Tata Consulting Services (TCS) India	82%
Merchants South Africa	86%

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

Further, we prioritised improving our training methodologies, particularly for our procurement and bidding teams, to better prepare them to mitigate modern slavery risks. We delivered tailored training sessions to address the specific needs of these teams, placing a significant emphasis on understanding modern slavery risks pertinent to their roles.

To gauge the effectiveness of these training sessions, we actively solicited feedback from participants via a survey. 100% of respondents who completed the survey reported that the training was both valuable and directly relevant to their respective roles, helping increase both their knowledge and awareness of modern slavery. Notably, the feedback highlighted a keen interest among attendees to further engage in the fight against modern slavery.

In 2024, we will continue to focus on strengthening our training and awareness programmes to help key business functions understand and manage modern slavery risks. We are committed to improving these initiatives so that our teams are better prepared to identify, address, and mitigate modern slavery risks.

Grievance and remediation processes

As outlined in the policy framework on page 16 we have several "speak up" mechanisms in place to report any fraud or wrongdoing including instances of suspected or actual modern slavery or other human rights issues. Our Whistleblower Policy, available on our internal and public website, outlines the investigation process including how reported matters are handled and fair treatment and protections available to whistle-blowers. During the reporting period, the Board approved a revised Code of Conduct, aligning with TPG Telecoms purpose. This revision incorporates

detailed information on human rights related obligations and enhances procedures for reporting concerns to a designated Compliance Officer, ensuring whistleblower protections were clearer. All employees are required to complete mandatory Respect in the Workplace training which includes guidance on how to raise issues. In 2023, we had no instances of modern slavery reported via our "speak-up" reporting mechanisms, however we acknowledge this does not mean there are no modern slavery-related practices occurring in our supply chain or operations. We recognise the importance of ensuring our grievance mechanisms are trusted and accessible by stakeholders.

In 2023, the **Modern Slavery Response Policy** was developed which outlines how actual or potential cases of modern slavery will be managed. This Policy was developed in consultation with the Resilience Team. The Policy is driven by the fundamental principle of protecting victims of modern slavery, ensuring their interests take precedence in our decision-making. The policy will be implemented in 2024.

To further develop our remediation processes, in 2024 we will be introducing an **Internal Modern Slavery Notification Form**. This form will serve as a confidential channel for employees to report any actual or potential instances of modern slavery within TPG Telecom. The purpose of this form is to empower employees to raise concerns related to modern slavery, ensuring any suspicions or observations are promptly addressed.

Concerns can be reported through the Whistleblower hotline by:

Calling
1800 500 965

Via a secure online facility at:
kpmgfaircall.kpmg.com.au/TPGTelecom

By post to:
The FairCall Manager,
KPMG Forensic, PO Box H67
Australia Square, Sydney NSW 1231

Collaboration

TPG Telecom recognises that tackling modern slavery requires a collaborative approach, involving various stakeholders.

During the reporting period, our collaboration efforts with the Telco Together Foundation focused on enhancing our understanding of modern slavery risks throughout our supply chain. Through this initiative, along with our engagement through the Global System for Mobile Communications Association, we collaborate with industry peers to exchange information and best practices, as well as to examine industry-wide risks and explore opportunities for collective action within the sector. During 2024, we will explore opportunities for collaboration and engagement with both government and non-governmental organisations to further enhance our capabilities in managing modern slavery. For example, we have been closely monitoring the Australian legislative landscape, including the statutory review of the MSA, and look forward to engaging with key stakeholders in its next phase.

Group	Overview	Participation
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 as well as signatories of the Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery. • In 2023, 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 grievance mechanisms and remediation identified as a key industry initiative for 2024.
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 the GSMA, we intend to strengthen our understanding of industry-wide risks and explore opportunities for collaboration among members on various human rights issues including those related to supply change management and modern slavery.

In 2023, we continued refining the key performance indicators (KPIs) used to assess the effectiveness of our Modern Slavery Framework. The following table outlines the key elements of our modern slavery effectiveness measures.

05
Assessing effectiveness

Pillar	Key component	How we assess our effectiveness	2023 Outcomes
Leadership	Oversee the implementation of the modern slavery program.	• Periodical reviews of our modern slavery program, governance structure and committee effectiveness.	• Developed our Human Rights and Modern Slavery Committee Charter. • Analysed modern slavery statement benchmarks to identify opportunities for improvement to our statement and broader program. • Engaged a specialist business and human rights advisory firm to identify best practice trends and provide feedback on our initiatives.
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.	• Engaged a specialist business and human rights advisory firm to conduct a Hot Spot analysis on our direct suppliers. • Continued the development of our technology-driven Third-Party Due Diligence Program • Conducted our annual modern slavery risk assessment focused on our indirect workforce and offshore operations control environment.
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.	• Training completion rates continued to improve during the reporting period, increasing from 93% to 96%. • Tailored training designed and facilitated with the procurement division to increase knowledge on identifying modern slavery risks within the supply chain. • Participant feedback from tailored training sessions was used to upgrade training content for the next reporting period. • Mandatory online training was rolled out to the broader Dealer network (159 dealers).
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.	• Designed a new program management tool to support driving and monitoring of our Modern Slavery Strategic Roadmap. • Conducted a review of our modern slavery KPIs and agreed on clear measures to enhance reporting and management of our performance against these indicators. • 12 out of the 16 planned Modern Slavery Roadmap initiatives were completed in 2023. The remaining 4 are in progress or scheduled for completion in 2024 as a priority. • Reviewed and updated our Procurement Policy to improve our procurement practices.
Collaboration	Actively participate in industry initiatives to combat modern slavery.	• Review and consideration of knowledge gained on what actions are taken by peers and leading organisations to improve our own Modern Slavery Roadmap.	• Participated in all monthly Telco Together Foundation Modern slavery meetings, with a focus on continuously driving improvements in our industry.

Driven by an expanding comprehension of human rights risks, including modern slavery risks, across our operations and supply chain, our modern slavery approach continues to strengthen and evolve. The table below outlines the progress made on our commitments for 2023 and includes the initiatives planned for 2024, many of which are underway.

06
Looking Ahead

2023 Commitments	Progress	2024 Outlook
Leadership Formalised the Human Rights and Modern Slavery Committee Charter. Obtain ELT and Board endorsement for the Modern Slavery Strategic Action Plan and progress implementation of the initiatives.[9]	Human Rights and Modern Slavery Committee Charter has been formalised. Modern Slavery Strategic Action Plan endorsed by the ELT and the Board.[9]	• Propose the 3-year Modern Slavery Roadmap to the ELT and Board for endorsement to and progress 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.
Risk Management Launch due diligence framework in conjunction with the supplier risk platform to assess and manage the risks within our supply chain.	Collaborated with the Telco Together Foundation to pilot a Due Diligence IT Solution to assess our Tier 1 high risk suppliers.	• Implementation of a Third-Party Due Diligence Program. • Refresh current precedent modern slavery clause with a risk tiered approach. • Completion of our modern slavery Hot Spot analysis.
Capability Provide targeted training to employees in areas such as Procurement, Finance and Retail. Launch e-learning module to Dealers.	Targeted training provided to the procurement and bidding teams. Refer to the section on 'Training & Awareness' on page 19. E-Learning module rolled out to dealers.	• 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.
Performance Incorporate detailed modern slavery remediation plans within the 'Crisis and Emergency Management Plan'. Commence monitoring of Modern Slavery Key Performance Indicators. Continue to improve procurement practices through standardisation and automation of our systems and processes including supplier due diligence and relationship management.	We have clearly defined the activation criteria & response for Modern Slavery related incidents within the 'Crisis and Emergency Management Plan' and our remediation protocols have been incorporated in the 'Modern Slavery Response Policy'. Monitoring of the Modern Slavery Key Performance Indicators continued throughout 2023. The Procurement Policy was reviewed, and work continues to automate our systems with the implementation of a Third-Party Due Diligence Program to support supplier due diligence and relationship management.	• Assess our existing grievance mechanism for modern slavery-related complaints to ensure alignment with the 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.
Collaboration Continue partnership with Telco Together Foundation to address modern slavery in the Telco industry. Partner with other bodies and experts in modern slavery.	The collaboration with our industry peers and Telco Together Foundation is an ongoing commitment. Refer to section on 'Industry Collaboration' on page 20.	• Continue partnership with Telco Together Foundation to address modern slavery in the Telco industry.

9. The Modern Slavery Strategic Action Plan has been refreshed by the proposed Modern Slavery Roadmap referred to for the 2024 Outook

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 About TPG Telecom – page 5
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.	2023 Highlights – page 3 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 21
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 4 Looking ahead – page 22