



Optus
Modern Slavery
Statement
2024

Yes

Yes OPTUS

The different categories we source goods and services from may also involve different levels of modern slavery risk.

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An aerial photograph of a long train of coal-filled railcars on a track. The train extends from the bottom left towards the top center. To the right of the tracks, there is a signal tower with a black signal light, a fence, and some utility boxes. The background shows a wide, flat landscape with some sparse vegetation and a body of water or a large field under a sunset sky.

Overview

About this statement

This Modern Slavery Statement (Statement) is made by Singtel Optus Pty Limited and covers the Optus group of companies for the 2024 financial year reporting period (1 April 2023 – 31 March 2024). The reporting entities covered by this Statement are listed in Appendix 2.

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The Optus group of companies is part of the Singtel Group.¹ The Optus group operates through various entities that share the same policies and processes, and the overall activity of the Optus group of companies is overseen by the Board of Directors of Singtel Optus Pty Limited and its committees. Accordingly, this Statement is a consolidated description of the actions taken to address modern slavery risks by the Optus group as a whole, and has been published as a joint Modern Slavery Statement in accordance with section 14 of the Modern Slavery Act 2018 (Cth) (MSA). Throughout this Statement, the terms "Optus", "we" and "our" are used to refer collectively to the entities within the Optus group of companies unless otherwise stated.

This Statement has been prepared by our Sustainability and Procurement teams in consultation with our Modern Slavery Working Group, which includes additional stakeholders from relevant functions across Optus, such as Finance, Legal, Risk, Internal Audit, People & Culture, Customer Success and Customer Solutions. Further information about consultation across the Optus group of companies is set out on page 47.

The Board of Directors of Singtel Optus Pty Limited has reviewed and approved this Statement, and it is signed by the interim Singtel Optus Pty Limited Chief Executive Officer.²

We welcome feedback on this Statement at: sustainability@optus.com.au.

¹ The Singtel Group is Singapore Telecommunications Limited (Singtel) and the group of companies owned and/or controlled by Singtel.

² Singtel Optus Pty Limited has approved and signed this Statement on behalf of the other reporting entities covered by this statement as a higher entity under section 14(2)(d)(ii) of the MSA.

Acknowledgement of Country

Optus acknowledges the Traditional Owners and Custodians of the lands on which we live, work and serve. We celebrate the oldest living culture and its unbroken history of storytelling and communication. We pay our respect to Elders – past, present and future – and we strive together to embrace an optimistic outlook for our future in harmony, across all of Australia and for all of its people.



"Connected Communities" artwork created for Optus by Indigenous artist Rhonda Sampson"

CEO Statement

At Optus, we aim to make a positive impact in the communities in which we operate and are committed to respecting the human rights and freedoms of every individual regardless of who they are, what they believe and where they live. This is the foundation for our belief that there is no place for modern slavery in our world.

We know that working together with our suppliers on modern slavery and broader human rights issues is key to achieving a more sustainable future and we are committed to being transparent and sharing the meaningful progress we have made. During the year, we enhanced our approach to managing modern slavery risks as set out in this Statement, including taking steps to strengthen our engagement with our suppliers through our new Supplier Engagement Roadmap. We have also integrated key recommendations from our Supplier Engagement Roadmap into our Modern Slavery Action Plan.

Across our business, we are committed to continuous improvement, learning along the way, and strengthening our engagement with suppliers to address ongoing challenges around modern slavery. While we had no reported instances of modern slavery relating to our operations or supply chain during the reporting period, we understand this does not mean no risks exist.

We look forward to building on our response over the coming year. This includes enhancing our modern slavery contract clauses, providing additional targeted internal training, exploring opportunities to deepen our engagement with high-risk suppliers and considering scope for social audits for our suppliers.

We are also monitoring the Australian Government's response to the independent review of the MSA to help ensure we are prepared to respond to any potential changes to the legislation and Government's expectations.

We hope you find this Statement informative and as always, we welcome your feedback.



Michael Venter, Interim Chief Executive Officer

Introduction

All businesses have an important role to play in combating modern slavery in global supply chains, including in the telecommunications sector. Our work to assess and address modern slavery risks in our operations and supply chain is a key element of our commitment to respect all internationally recognised human rights in line with the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#).

As a leading Australian telecommunications provider, we are committed to ensuring there is no place for modern slavery in our operations or supply chain. We have been a signatory to the [UN Global Compact](#) since 2007, which includes a focus on eliminating forced and compulsory labour and child labour. We are also proud to support the [2030 UN Sustainable Development Goals \(SDGs\)](#), with one of our priority SDGs including Goal 8: decent work and economic growth. Importantly, Goal 8 includes a strong focus on taking action to help end modern slavery.

³ This definition of modern slavery is taken from the Australian Government's official guidance material about the MSA.

What is Modern Slavery?

Modern slavery occurs when 'coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.'³ Modern slavery involves serious human rights abuses and can happen here in Australia, as well as overseas. The International Labour Organization (ILO) and Walk Free Foundation estimate that over 50 million people around the world are victims of modern slavery. According to new 2024 ILO estimates, the illegal profits from this exploitation amount to US\$236 billion. The Walk Free Foundation also estimates there may be up to 41,000 modern slavery victims in Australia and that electronics are one of Australia's 'top five imported products at risk of modern slavery'.



Our progress to date

Continuous improvement is core to our modern slavery response and we aim to be transparent about our goals and progress.

We are working to further refine our modern slavery risk management across a range of areas.

In our last statement, we committed to:	We have progressed this commitment by:
Implementing our Supplier Engagement Roadmap and commencing detailed reviews of key suppliers in high-risk sectors to better understand their operations and supply chains, potential risks and mitigation strategies	Finalising our Supplier Engagement Roadmap and identifying priority recommendations for action during the reporting period to enable us to better understand our modern slavery risks in our supply chain and opportunities to enhance our risk management in these areas. This included a detailed review of a selected own brand supplier with further reviews planned for the next reporting period.
Refining formal indicators to support us to monitor and report on the effectiveness of our response	Continuing to consider the scope to enhance our effectiveness indicators, including benchmarking the quality of our modern slavery reporting, including in this area, against a selected peer. Moving forward, we will also consider how we can monitor the effectiveness of new actions implemented as part of our Supplier Engagement Roadmap.
Reviewing our procurement and Request for Proposal (RFP) process to include assessment of modern slavery risk management	Reviewing key procurement and RFP processes as part of our Supplier Engagement Roadmap and commencing implementation of actions to refine our approach in these areas, including new modern slavery tender questions. We also piloted tailored modern slavery tender questions in a high-risk supplier category during the reporting period. This helped inform our decision making on appropriate vendors.
Undertaking an assessment of our whistleblower mechanism in line with the effectiveness criteria in the UNGPs	We continue to benchmark our whistleblower process annually against good practice and legislative requirements (noting that this benchmarking review focuses on the overall functioning of the whistleblower mechanism and is not specific to modern slavery). To inform our consideration of next steps, we also specifically benchmarked the quality of our modern slavery reporting, including in relation to grievance mechanisms and reporting, against a selected peer. We subsequently commenced a high-level assessment of our whistleblower mechanism in line with the effectiveness criteria in the UNGPs and will report on this work in the next statement for FY25.
Providing additional tailored modern slavery training targeted to selected Optus staff involved in managing key supplier relationships	Delivered a general modern slavery awareness-raising session to representatives from Optus Procurement in June 2023. We will also provide an additional training session for relevant category and vendor managers in FY25, which will be reported on in the next statement.

Our future plans

We are also working to identify ways we can further strengthen our ongoing response to modern slavery.

Over the next reporting period, we aim to prioritise:

- Engaging with selected higher risk suppliers, including relevant Own Brand suppliers, through detailed reviews to assess their modern slavery risk management.
- Delivering tailored training to relevant vendor and category managers to support them to better manage modern slavery risks through their engagement with suppliers.
- Implementing enhanced modern slavery contract clauses with selected suppliers.
- Implementing modern slavery tender questions for higher risk suppliers and using the results to inform our understanding of risk areas and approach to risk management.
- Considering scope to implement social audits for selected suppliers.
- Supporting the development of the Singtel Group Responsible Procurement Policy and strengthening our suppliers' understanding of our human rights and modern slavery requirements.



1. OPTUS

Our structure, operations and supply chain

OPTUS

OPTUS

Pay over time.
Interest free.

Create
your own
case

Keep the whole family connected

\$79/mth

We are Australia's second largest provider of telecommunications services, providing customers with over 11 million services across Australia each day, and understand the important role we play in tackling modern slavery.

Our structure

Optus is part of the Singtel Group, Asia's leading communications technology company that, through its associates, has a combined 770 million mobile customers across 21 countries. Optus operates as a corporate group comprised of over 40 entities. In addition to the customer-facing entities listed in Appendix 2 that provide telecommunications, content and other services, Optus also operates subsidiaries that provide support services for our operations, including engaging Optus staff and performing management and billing services.

Optus is headquartered in Macquarie Park, New South Wales, and we have offices and retail outlets across all states and territories of Australia, employing more than 6,700 people. Key functions across our business relevant to our modern slavery response include Networks, Enterprise and Business, People and Culture (including Group Sustainability), Risk Management, Group Finance (including Legal and Procurement), Internal Audit, Customer Success (Retail and Customer Contact Centres) and Customer Solutions (Operations and Enablement).

Our operations

We deliver a comprehensive range of telecommunications products and services, including mobile and fixed line telephone, fixed and mobile broadband services, multimedia entertainment and technology, and converged business telecommunications and applications and solutions to small and medium sized businesses, enterprise and government customers.

Optus is also Australia's largest and most experienced satellite owner and operator, with five satellites currently in orbit providing satellite services across Australia and New Zealand and to McMurdo Sound in the Antarctic.

Our nationwide retail network operating under the Optus brand includes proprietary, franchisee, and licensee stores. Optus stores are in 275 locations to provide Australians with easy access to high quality telecommunications services and solutions.

We also service the telecommunications market through our wholesale business, which sells access to our communications network to other telecommunications service providers. In addition, we have agreements with business partners overseas who provide roaming services to our customers travelling outside Australia. In some cases, these roaming services are provided by other entities in the Singtel Group.

Our supply chain

We have a large and diverse global supplier base with over **1,300 direct suppliers**. Approximately **95% of our procurement spend** in the reporting period was in the following categories:



Our operations:

We are a fully integrated telecommunications provider. We have over **275 Optus stores** (approximately two-thirds managed by partner groups)

Our people:



6,700+ team members



400+ contingent* workers within our Australian operations



Various types of external services workers, such as contact centre workers

Our services:



Local, long distance and international, mobile and fixed line voice



Broadband



Multimedia entertainment and technology services



Satellite services



Converged business telecommunications applications and solutions

Our customers:

We support individual and enterprise customers around Australia. **98.5% of the Australian population** is covered by our 4G and 5G networks.

Our supply chain

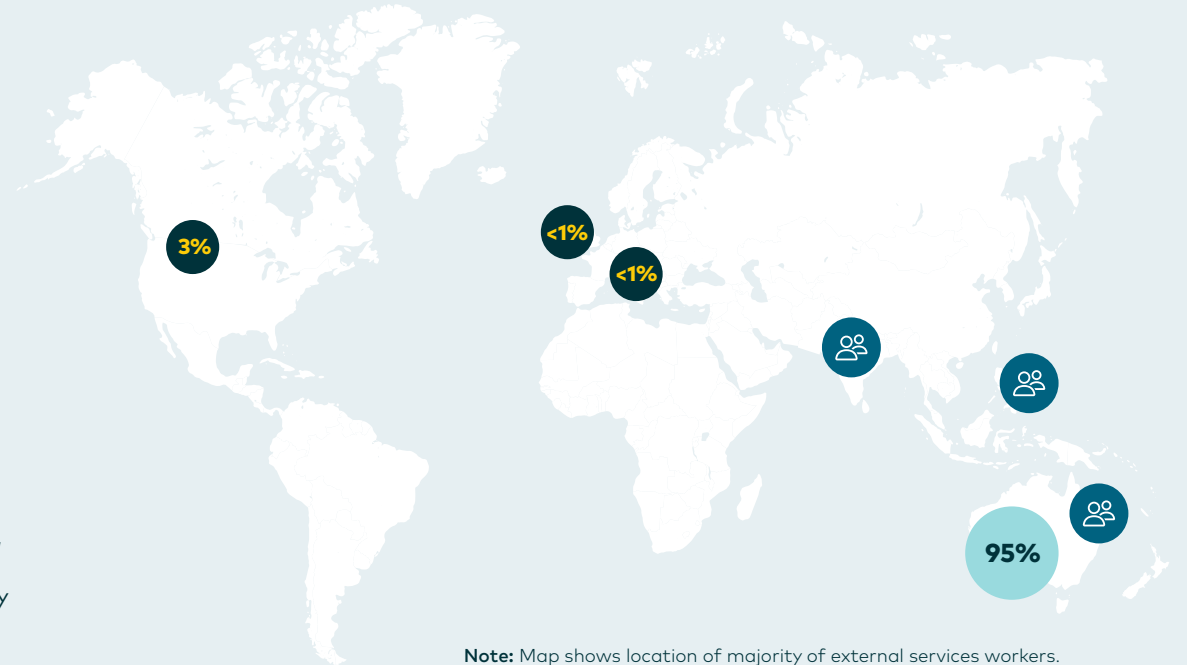
We draw on our global supply chain to support our operations.

The majority of supplier identification, evaluation and engagement is facilitated by Optus Procurement. Our centralised Procurement team supports the business to undertake transparent and effective sourcing processes, identify and implement risk mitigation, assess supplier practices and align commercial and business goals with Optus' values and public commitments. During the reporting period, the dedicated Supplier Management Centre of Excellence team acted as internal advisors to the procurement team and broader Optus business to meet minimum standards and ongoing supplier performance management and monitoring, in parallel working to simplify the supplier experience supporting Optus. More information about our Procurement team and our work to further enhance our procurement frameworks is set out on page 28.

Where are our suppliers located?

While approximately 83% of our 1,300+ suppliers are located in Australia, many of these may operate in or source from diverse countries overseas. Levels of modern slavery risk across these countries may vary, including due to factors such as conflict and displacement and the effectiveness of local legal frameworks.

The region for Goods Received Notices (GRN) is based on the predominant country where the majority of suppliers have listed their local contacts. We recognise that this is not necessarily the country where the product or service is manufactured or sourced from, and we are undertaking work to better understand our supply chain beyond Tier 1.



Note: Map shows location of majority of external services workers. We have a small number of external services workers (>40) in Europe.



India-based external services workers servicing Customer success, Networks, IT, Finance, Enterprise and Business



Philippines-based external services workers servicing Customer success, Networks, IT, Finance, Enterprise and Business



Australia-based external services workers servicing a range of business units including Customer Success, Customer Solutions, Networks, IT, Finance, Enterprise and Business.



% of Optus GRN by region

Approximate number of Optus tier one suppliers by region

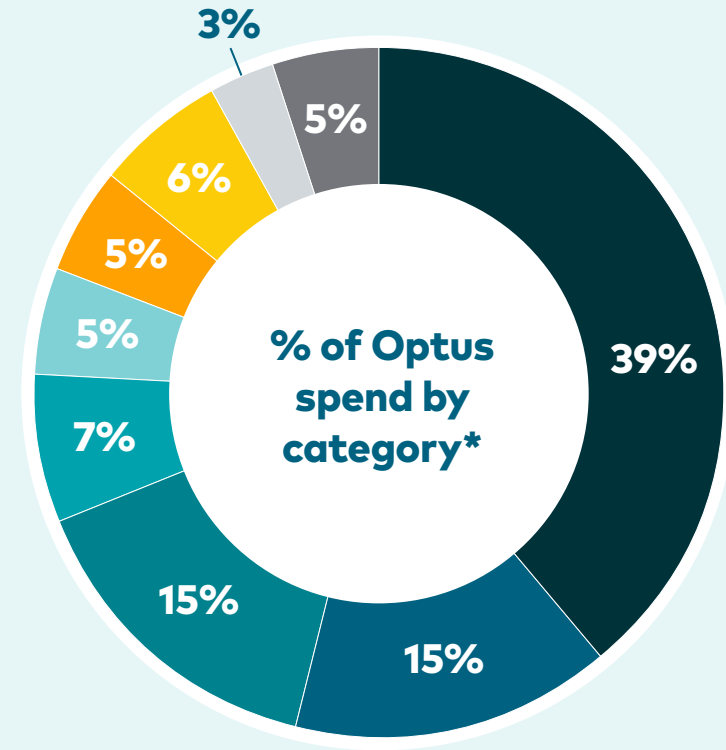


What do we procure from our suppliers?

The different categories we source goods and services from may also involve different levels of modern slavery risk.

As shown in the visual on the right, a significant proportion of our supplier spend is for mobile devices as well as network and equipment. However, while our spend in some categories such as devices is concentrated across a small number of suppliers, our spend in other categories like professional services can involve a higher number of suppliers. The size of our suppliers can also vary significantly within and across categories.

These factors mean that the capacity of our suppliers to manage modern slavery risks is not uniform and can also affect our ability to use our leverage to influence supplier practices. For example, although we have significant spend with our electronic devices suppliers, the size of these businesses means we may have limited leverage to influence how they manage their modern slavery risks. The visual to the right shows information about our supplier spend based on annual goods receipts by category.



- Mobile Devices
- Network and equipment
- Technology Professional Services
- IT and Equipment
- Building and facility construction and maintenance
- Professional services (including management advisory services)
- Advertising and media
- Contact Centres
- Other

* % of GRN by category is based on dollar(\$) value of GRNs. Values are indicative and provided for illustrative purposes.

Case Study: Understanding our supply chains beyond Tier 1

The telecommunications sector involves a range of complex supply chains, which can involve sourcing activities in multiple countries. In some cases, the most significant modern slavery risks in these supply chains can occur below the Tier 1 level (the suppliers with which we have a direct contractual relationship). This means it is important that we work to understand the types of activities that may occur across our full supply chain, including below Tier 1 level.

The visual to the right explains the key components of selected supply chains relevant to Optus at an indicative level. This visual is intended as a guide to show the different tiers that may be involved in supply chains and does not show every element of the relevant supply chains.



Delivery to Optus stores or direct mail out to customers



Delivery to Optus



Delivery to Optus stores



Delivery to Optus stores



Workers providing cleaning services to Optus



Workers engaged by subcontractors provide services to relevant sites around Australia



2.

Identifying our modern slavery risks

We are committed to respecting all human rights, including the right to freedom from slavery. As part of this commitment, we work to assess and address modern slavery risks throughout our operations and supply chain.

How we apply the UN Guiding Principles on Business and Human Rights (UNGPs) to understand how telecommunications companies could be involved in modern slavery risks

In line with the UNGPs and the Australian Government's guidance about the MSA, we understand modern slavery risks to refer to the potential for a business to cause, contribute to, or be directly linked to modern slavery through its products, operations or services by its business relationships. The table on page 18 summarises how this 'cause, contribute, directly linked' continuum of involvement is relevant to the telecommunications sector.

This continuum of involvement is important as it helps identify the different ways that telecommunications companies could be involved in modern slavery. We have also drawn on the continuum of involvement to inform our Modern Slavery Incident Response Plan, which provides guidance on how we would seek to remediate modern slavery harm in line with the UNGPs expectations.



How we apply the UN Guiding Principles on Business and Human Rights (UNGPs) to understand how telecommunications companies could be involved in modern slavery risks (continued)

The UNGPs and the continuum of involvement		Potential modern slavery risks in the telecommunications industry
Cause	A business may cause modern slavery if its actions directly result in modern slavery practices occurring.	<p>Telecommunications companies could potentially cause modern slavery by, for example, employing young workers who are potentially subjected to hazardous work or otherwise exploited.</p> <p>Optus employs a limited number of young workers under the age of 18. Where employed - these young people perform work in our retail stores. Optus has a practice of ensuring that all employees are at least 16 years of age to ensure that Optus complies with child employment laws. In addition, where young workers are engaged, they are paid at the adult rate of pay under the Optus Retail Agreement 2023 and their conditions of work are defined by this enterprise agreement which also limits the number of hours of work and prescribes breaks between shifts and overtime.</p>
Contribute	A business may contribute to modern slavery if its actions or omissions facilitate, enable or incentivise modern slavery practices to occur.	<p>Telecommunications companies could potentially contribute to modern slavery in a number of ways. For example, this could include where the company disregards credible evidence that a supplier is engaged in modern slavery (for example in an audit report) and does not take any steps to address the exploitation.</p> <p>As outlined in this statement, we work to manage modern slavery risks in our supply chain. More information on these steps can be found on page 20.</p>
Directly Linked	A business may be directly linked to modern slavery where it is connected to modern slavery through its products, services or operations (including where there is no direct contractual relationship).	<p>Telecommunications companies could potentially be directly linked to modern slavery if exploitation occurs in their supply chains. For example, goods such as mobile devices could be procured from a supplier which produces the devices at third party factories, which use raw materials that are produced through forced labour.</p> <p>We take a number of steps to manage these risks, including working to enhance our engagement with suppliers to understand their extended supply chains and risk management approaches. More information about our work with suppliers can be found on page 32.</p>

Our salient human rights issues

Our commitment to respect human rights applies not only to modern slavery, but to all internationally recognised human rights. In particular, for our sector, relevant human rights that we may impact include the human rights to privacy; to a clean, healthy and sustainable environment; and children's rights.

We have identified our six salient human rights issues, which are the areas where the most severe actual or potential human rights impacts could occur through Optus' activities or business relationships. Severity in this context is understood through the lens of risk to people, rather than risk to our business.



Modern slavery is often closely connected to other human rights impacts. For example, a factory that exploits its workers may also have poor environmental practices. Completing the salient human rights assessment has supported us to deepen our understanding of how our actions to manage modern slavery risks align with our broader work to respect all human rights. While the six salient human rights issues above are all of equal importance to Optus, our work to manage modern slavery risks are particularly relevant to the following areas:

1. Supporting safe and fair work in our supply chain
2. Avoiding adverse human rights impacts on the communities where we operate
3. Providing a safe and equitable workplace
4. Working to secure the safe and healthy use of our products, especially by children (recognising that children can be especially vulnerable to exploitation online)

Understanding our modern slavery risk profile



The table below highlights six areas of our operations and supply chain where we consider there may be potential for modern slavery to occur if our controls were not effective. It also identifies risk factors that may contribute to the vulnerability of workers to exploitation. The key controls we use to manage modern slavery risks are set out in the following section.

During the reporting period we re-validated our understanding of our modern slavery risk profile by undertaking a desktop review of key factors (including sector, product and geographic risk factors) and the evidence base for modern slavery across relevant risk areas. This process drew on expertise from an expert business and human rights advisory firm, as well as information from credible third-party reports and tools from the Australian and US Governments, expert civil society groups, and other stakeholders.

Our Operations

Overall, we assess that our operations involve a comparatively low level of modern slavery risk. This reflects factors such as the concentration of our direct workforce in Australia and the nature of the work typically undertaken by our people. However, as outlined below, we recognise that there are areas of our broader operations where modern slavery risks could occur if our controls and risk management was not effective.

In line with the UNGPs, we assess that we could be directly linked to any potential modern slavery that might occur in the areas identified below.



Potential risk area where modern slavery could occur	Potential modern slavery risk factors that may contribute to the vulnerability of workers	How this risk area is relevant to Optus
 <p>Partner groups operating branded retail stores</p>	<ul style="list-style-type: none"> Use of franchisee and licensee arrangements may affect visibility of working conditions in partner-operated stores. 	<p>We have an extensive network of franchisee and licensee (partner) group operated stores around Australia, who are responsible for engaging employees. Further information about how we engage with our partner groups to address potential risks is set out on page 34.</p>
 <p>Services provided by workers in offshore contact centres</p>	<ul style="list-style-type: none"> Use of lower skilled labour, which may include migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance. Workers may be located in countries with differing levels of modern slavery risks and legislative and other protections. 	<p>Our operations are supported by employees of our suppliers based outside of Australia. For example, approximately 5,000 staff located in India and the Philippines provide contact centre services to our customers. Further information about how we engage with our customer success contact centre suppliers to address potential risks is set out on page 34.</p>

Understanding our modern slavery risk profile (continued)

Our Supply Chains



Overall, we assess that our greatest exposure to modern slavery risks is through our supply chains. The level of modern slavery risk in our supply chains varies by category and may be shaped by factors such as the locations where suppliers and their sub-suppliers operate, the types of workers involved in the supply chain (e.g. whether workers are part of more vulnerable groups such as migrant workers), and the nature of the materials used in the production of products for Optus. While the categories below may involve higher modern slavery risks, we consider that other areas of our supply chain are likely to be lower risk, such as our engagement of professional services providers.

In line with the UNGPs, we assess that we could be directly linked to any potential modern slavery that might occur in the areas identified below.

Potential risk area where modern slavery could occur	Potential modern slavery risk factors that may contribute to the vulnerability of workers	How this risk area is relevant to Optus
 <p>Contractors building and maintaining telecommunications infrastructure</p>	<ul style="list-style-type: none"> • Use of lower skilled contracted labour who may have limited understanding of workplace rights, and face other barriers in seeking assistance. • Use of raw materials which may involve higher modern slavery risks, including where these materials are sourced from countries with a high prevalence of modern slavery. • Potential provision of services outside core business hours (such as at nighttime), which may increase the difficulty of identifying exploitive practices by limiting visibility of working conditions. 	<p>We engage a range of contractors in Australia to build and maintain infrastructure. Further information about our supplier risk management approach is set out on page 34.</p>
 <p>Contractors providing cleaning, security, waste removal and other property management services</p>	<ul style="list-style-type: none"> • Use of lower skilled contracted labour, potentially including migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance. • Potential provision of services outside core business hours (such as at nighttime), which may increase the difficulty of identifying exploitive practices by limiting visibility of working conditions. • Sourcing from sectors that can involve strong pricing competition and where labour costs comprise a significant portion of suppliers' expenses, which may incentivise suppliers to reduce costs by engaging in exploitive practices. 	<p>We engage a range of contracted service providers to support our operations, including by providing cleaning, waste removal and property management services for our offices and security services for our sites across Australia. Further information about how we engage with our contracted service providers is set out on page 34.</p>

Understanding our modern slavery risk profile (continued)

Our Supply Chains (continued)

Potential risk area where modern slavery could occur	Potential modern slavery risk factors that may contribute to the vulnerability of workers	How this risk area is relevant to Optus
 <p>Procurement of products for resale and not for resale (eg devices, tablets, accessories, IT and network technology equipment, and uniforms) from suppliers</p>	<ul style="list-style-type: none"> • Use of lower skilled or low wage contracted labour, potentially including migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance. • Use of transport and logistics services such as shipping and warehousing where workers may be vulnerable to exploitation, including where they work in isolated conditions (such as seafarers). • Use of raw materials which may involve higher modern slavery risks, including where these materials are sourced from countries with a high prevalence of modern slavery. 	<p>We have previously identified construction and maintenance support equipment; electrical equipment, components and supplies; and electrical wire management devices and accessories as higher risk supplier categories. Further information about how we manage modern slavery risks related to the procurement of products is set out on page 35.</p>
 <p>Workers providing storage and warehousing services</p>	<ul style="list-style-type: none"> • Use of lower skilled contracted labour, potentially including migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance. • Potential provision of services outside core business hours (such as at nighttime), which may increase the difficulty of identifying exploitive practices by limiting visibility of working conditions. 	<p>We engage a small number of suppliers to provide storage and warehousing services.</p>



Case Study:

Understanding our modern slavery risks in our supply chain through an updated modern slavery questionnaire

As outlined in our FY22 and FY23 Statements, a key focus area for Optus has been exploring options to further refine our supplier questionnaire process. During the FY22 reporting period, we implemented a modern slavery questionnaire for our key suppliers using ethiXbase.

During this reporting period, we worked with ethiXbase to update the supplier assessment questionnaire to be reissued to high-risk categories identified through our Supplier Engagement Roadmap work, including those which were assessed as high risk due to their responses to the previous ethiXbase questionnaire. We sent the updated questionnaire to identified high-risk suppliers in April 2024 and will report on the results in the FY25 Modern Slavery Statement.



Case Study: Assessing risks through our tender process

Our leverage to influence suppliers' modern slavery risk management approaches can vary due to a range of factors, such as the size of our spend and the length of our relationship with the supplier. Importantly, our level of leverage can also vary based on the stage of the procurement process. For example, our work on the Supplier Engagement Roadmap highlighted that our ability to seek information from suppliers about modern slavery risk management and our leverage to influence positive action may be higher during the tender process, compared to once the contract has been signed with a supplier.

We have continued to use tools such as the ethiXbase questionnaire as a targeted mechanism to gather information from existing suppliers in relation to their modern slavery risk management. However, we are also working to strengthen our broader capacity to gather information about relevant modern slavery risks and how they are managed at the commencement of our relationship with a supplier.

As recommended by our Supplier Engagement Roadmap, we commenced developing a list of modern slavery related questions to include in the tender process during the reporting period. Our Supplier Engagement Roadmap includes a set of suggested tender questions, which we are using as the basis for this work. Our focus is on developing questions that are practical and easily understood by prospective suppliers and which will enable us to gather critical information on their modern slavery risk level and approach to modern slavery risk management. We will progress this work over the next reporting period and will report in more detail on these activities in our FY25 Modern Slavery Statement.

During the reporting period, we were also able to pilot the use of tailored modern slavery tender questions in a uniforms procurement. All suppliers answered the questions in their responses and we used this information to help inform our decision on appropriate vendors.

See further information on our Supplier Engagement Roadmap development on page 32.



3.

Our actions to manage our modern slavery risks



We work to continuously improve our activities to manage our modern slavery risks in seven key areas:



**Our
governance
structure**



Our policies



Our training



**Our grievance
mechanisms and
remediation**



**The role of
our teams**



**Our approach to
due diligence**



**Our collaboration
and stakeholder
engagement**

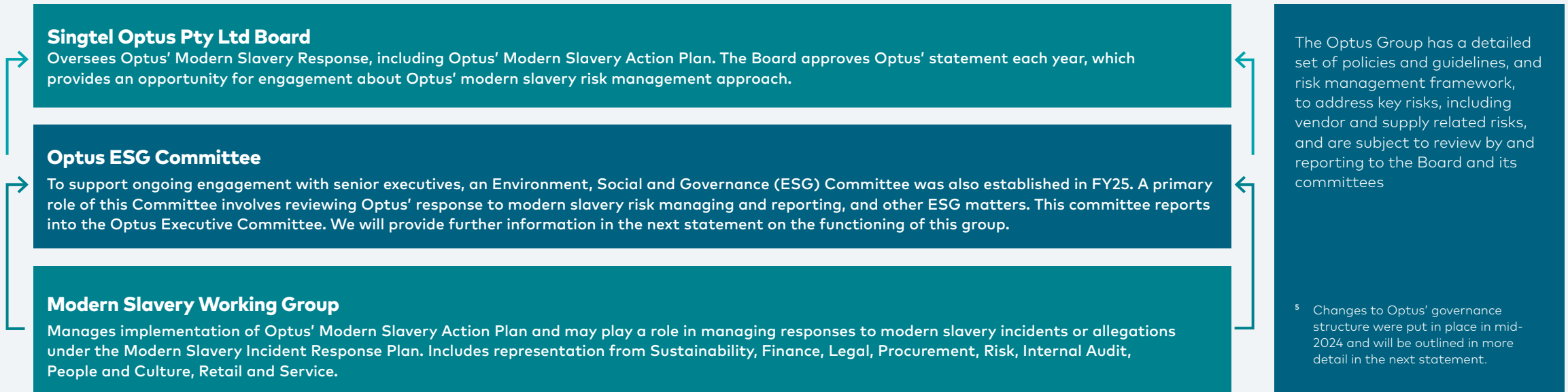
Yes



This section of the statement explains our work in each area.

Our governance structure

Our response to modern slavery is led by our cross-functional Modern Slavery Working Group. The Sustainability and Procurement teams also engaged with key Working Group representatives throughout the year to progress work specific to their area. The visual below shows how responsibility for modern slavery is incorporated into our governance structure.



The role of our different teams

Our modern slavery response is supported by a range of business units across Optus. These teams all play important roles in managing our modern slavery risks.

<p>Sustainability</p>	<p>Our Sustainability team is responsible for leading and facilitating the implementation of our modern slavery response in collaboration with our Procurement team. The Sustainability team seeks to support and enable change within Optus, including developing Optus' modern slavery reporting and collaborating with various functions on integrating sustainability priorities and targets within our day-to-day operations.</p> <p>Importantly, the Sustainability team is also responsible for Optus' broader work to respect human rights, including the Optus Human Rights Statement. This supports the team to integrate our modern slavery risk management with our wider work on human rights, including through processes such as our salient human rights assessment.</p>
<p>Procurement</p>	<p>Our centralised Procurement team works closely with the Sustainability team to lead and facilitate the implementation of our modern slavery response. The Procurement team supports the business to undertake transparent and effective sourcing processes, assess supplier practices and align commercial and business goals with Optus' values and public commitments. During the reporting period, our Procurement team also included a Supplier Management Centre of Excellence function responsible for providing dedicated support and advice to internal business units on contract management, sustainable procurement, and supplier management.</p>
<p>Legal</p>	<p>Our Legal team provides legal support for our response, including providing guidance on issues such as the development and use of modern slavery contract clauses in our agreements with suppliers.</p>
<p>Internal Audit</p>	<p>Our Internal Audit team provides independent, objective assurance over the controls put in place to manage risks across Optus, including modern slavery. Internal Audit's investigation team may play a role in identifying and then investigating modern slavery related complaints received through our whistleblower mechanism or other reporting channels.</p>
<p>Risk Management</p>	<p>Our Risk team oversees the operationalisation of the risk management framework across Optus, which can include the management of risks relating to modern slavery.</p>
<p>People & Culture</p>	<p>Our People & Culture Team is responsible for the development and implementation of our People & Culture policies, procedures and practices, and manages engagement of contingent workers under contracts put in place with oversight from the Procurement team.</p>
<p>Enterprise and Business, Customer Solutions and Customer Success</p>	<p>Our core product and services teams play a role in managing potential modern slavery risks related to the products and services provided by Optus, including retail stores and franchises, our offshore contact centres, and provision of services to our enterprise customers.</p>

Our policies

Our policies and procedures underpin the way we engage with our people and suppliers, including in relation to issues such as modern slavery.

Policy	How does the policy support our modern slavery response?	How is the policy implemented?
<p>Human Rights Statement</p>	<p>Our Human Rights Statement was launched in December 2020 and reinforces our commitment to respect all human rights. It provides an overview of our approach to human rights, the standards we set for ourselves and the expectations for the people who work for us, and on our behalf. The Human Rights Statement specifically sets out our commitment to prohibit child labour and modern slavery in any form.</p>	<p>Our Human Rights Statement is published on our website. Optus has also increased awareness and access to this Statement through our internal communications with links to the Statement. The Human Rights Statement is also promoted through our annual modern slavery e-learning module.</p>
<p>Procurement Policy</p>	<p>The Procurement Policy's objective is to ensure all goods and services are acquired via standard process, mitigating risk. As part of this Procurement Policy, we require suppliers to agree and comply with The Singtel Group Supplier Code of Conduct.</p>	<p>The Procurement Policy is published on our Optus intranet. The policy is regularly reviewed and we communicate any policy enhancements and changes across our business.</p>
<p>Supplier Code of Conduct</p>	<p>The Singtel Group Supplier Code of Conduct sets out the expectations of all suppliers with whom the Singtel Group (including Optus) does business. It includes a specific section on human rights, including modern slavery, which sets out the Singtel Group's prohibition on the use of modern slavery in its operations and supply chains and expectations for suppliers. This includes a requirement for international suppliers to have systems to demonstrate compliance with ILO Conventions on labour standards, the Universal Declaration of Human Rights and the UN Convention on the Rights of the Child. The Supplier Code of Conduct also addresses issues that may be indicators of modern slavery, such as harassment and corruption.</p>	<p>The Supplier Code of Conduct is published on the Singtel Group website. It includes details of mechanisms available to suppliers to report any potential breaches. To do business with Optus, all our suppliers must confirm their acceptance of, and comply with, the Supplier Code of Conduct. This requirement is included in contractual agreements with suppliers.</p>

Our policies (continued)

Policy	How does the policy support our modern slavery response?	How is the policy implemented?
<p>Contractual Terms and Conditions</p>	<p>We require our suppliers to take reasonable steps to identify and prevent the occurrence of modern slavery offences in their organisation and supply chains, as well as those of any third party with whom they do business. Importantly, our suppliers are asked to notify us upon becoming aware of any modern slavery issue occurring in their organisation or supply chain. See further information in the case study on page 31.</p>	<p>Where appropriate, we discuss these contract clauses with suppliers during contract negotiations. We may also ask our suppliers for access to reports, certifications, audit reports, information and documents, including the completion of a self-assessment questionnaire to assist us in monitoring ongoing compliance with these terms and conditions.</p>
<p>Employment Policies and Frameworks</p>	<p>Optus is a leading employer and developer of talent in the Australian market and provides a comprehensive framework for employment. This framework is underpinned by industrial instruments approved by the Fair Work Commission and provides minimum terms and conditions of employment for our people beyond minimum statutory legal entitlements. Employee terms and conditions of employment are comprised of Optus' relevant industrial instruments, contracts of employment and employment related policies and benefits, which build on minimum employee entitlements.</p>	<p>Employee contracts of employment provide for, at a minimum, terms and conditions of employment that meet legislative and the relevant industrial instrument obligations. Optus' industrial instruments and policies, which enable and support employee terms and conditions, are also published on the Optus intranet.</p>



Case Study:

Developing tiered contractual clauses addressing modern slavery for use based on supplier risk level

Contracts with suppliers provide an important tool to set clear requirements related to modern slavery risk management. Through our work on the Supplier Engagement Roadmap, we identified an opportunity to enhance our current standard clauses to help ensure they remain fit for purpose. This includes developing tiered clauses which can be used based on the modern slavery risk level of the supplier. For example, a more detailed clause could be used for a high risk supplier, while a low risk supplier could draw on a simpler clause.

As part of the development of the Supplier Engagement Roadmap we reviewed existing model clauses about modern slavery produced by the Australian Government and the NSW Anti-Slavery Commissioner. We also reviewed the types of modern slavery related tender questions and clauses used in current agreements with higher risk suppliers, such as property management and uniforms.

Following completion of the Supplier Engagement Roadmap, we commenced developing tiered contractual clauses, focusing on a more detailed modern slavery clause for procurements identified as high risk and a simpler clause for our lower risk procurements. Preparation for these activities started at the end of the reporting period covered by this statement and the majority of this work will be progressed over the next reporting period (the financial year ending 31 March 2025). We will report in more detail on these activities in our next statement.

See further information on our Supplier Engagement Roadmap development on page 32.



Our Modern Slavery Action Plan

Our internal Modern Slavery Action Plan identifies key steps we plan to implement to continue to refine our modern slavery response. To provide clear accountabilities for action, each recommendation in the Modern Slavery Action Plan is assigned to a business unit to progress. The Working Group also tracks the implementation of the plan at its meetings. We periodically refresh and update our Modern Slavery Action Plan. For example, during the reporting period, we added additional action items identified through our Supplier Engagement Roadmap.

Our Supplier Engagement Roadmap

During the reporting period, we finalised our Supplier Engagement Roadmap to support our work to assess and address modern slavery risks in our supply chain. The aim of the Roadmap is to provide us with a practical framework to guide and prioritise our engagement with our suppliers about modern slavery.

We developed the Roadmap in consultation with an external business and human rights advisory firm. The Roadmap was also informed by a series of internal consultations with relevant supplier category and relationship managers.

The Roadmap identifies:

- potential areas of modern slavery risk across our supply chain, including by re-validating previously identified risk areas
- key recommended actions to refine our understanding of potential risk areas focused on mapping our supply chain and understanding our high risk categories
- how we can better engage with our Own Brand suppliers in relation to modern slavery risk management
- opportunities to develop and refine overarching controls to build into our procurement process to support us to identify and manage modern slavery risks.

We have integrated key recommendations from the Supplier Engagement Roadmap into our Modern Slavery Action Plan and took steps to progress a number of these actions during the reporting period, including:

- Reviewing high risk areas for modern slavery in our procurement categories and identifying the suppliers in these areas
- Developing a guidance document for suppliers on operating effective grievance mechanisms
- Developing tiered contractual clauses addressing modern slavery based on supplier risk level
- Developing a formal process for assessing modern slavery risks in the tender process through a targeted questionnaire
- Developing 'palm card' indicators setting out modern slavery red flags for Optus staff to be aware of when engaging workers or directly with suppliers

Preparation for these activities started at the end of the reporting period covered by this statement and the majority of this work will be progressed over the next reporting period. We will report in more detail on these activities in our next statement.

Our Modern Slavery Action Plan (continued)

Our approach to due diligence

We remain committed to continuously strengthening our understanding of potential modern slavery and other human rights risks relating to our operations and supply chains. We also value dialogue with our enterprise and business customers and regularly respond to requests for information about our modern slavery approach.

Our current approach to due diligence is applied to all suppliers who want to do business with Optus. We take a tiered approach through segmentation of our suppliers based on their criticality to our core business and environmental, social and governance (ESG) risks, including human rights, decarbonisation, and governance to tailor our engagement accordingly.

Our supplier risk management framework begins as part of the sourcing and onboarding process in prequalification by including ESG questions and clauses to assess supplier existing practice. The supplier risk management framework continues through the contract lifecycle and involves cross-functional collaboration with key stakeholders from across the business. During the lifecycle of the contract, suppliers undertake different risk management actions such as regular performance review meetings, audits, training events, and provision of data.

During the reporting period, we also worked through our Supplier Management Centre of Excellence to enhance our procurement processes, which included a review of Optus' current procurement processes and policies against public sustainability commitments and best practice frameworks.

Preparation for these activities started at the end of the reporting period covered by this statement and the majority of this work will be progressed over the next reporting period (the financial year ending 31 March 2025). We will report in more detail on these activities in our next statement.

Case Study:

Applying due diligence checks to recruitment of our contingent workforce

Optus engages the services of contingent workers through an approved panel of 15 HR Recruitment service suppliers and two payroll providers. These workers are engaged for defined periods of time to temporarily supplement the workforce and can be engaged across various business units. The panel of HR Recruitment services suppliers was established in 2023 following a robust procurement process and must be used by all Optus business units when engaging contingent workers. The HR Recruitment service suppliers approved for the panel were selected through a process which includes full compliance to Optus policies and procedures, this includes compliance with our standard modern slavery contract clauses.

The HR Recruitment service suppliers are required to undertake pre-employment checks on all workers provided to Optus, which includes verifying workers are eligible to work in Australia as well as other probity and background checks.

Optus undertakes annualised audits of the contingent worker cohort to verify key information, including that the workers are eligible to work in Australia. The most recent audit in 2023 covered the entire Optus contingent worker cohort and did not identify any non-conformances relevant to Optus' modern slavery risk management.

Managing Modern Slavery Risks for Key Supplier Categories

In addition to our standard procurement processes, we also work closely with key suppliers to support our efforts to manage modern slavery risks.

Contact centres	Partner retail stores	Facilities
<p>We work closely with our third-party Customer Success contact centre suppliers in India and the Philippines to help provide a safe and fair working environment for the approximately 5,000 workers in these locations.</p> <p>During the reporting period, we undertook in-person visits to key contact centre sites. This enables us to speak directly with workers and monitor practices on the ground.</p> <p>More broadly, we continue to engage with our contact centre suppliers through quarterly surveys, periodic virtual events and targeted sessions with contact centre workers to seek their direct feedback.</p>	<p>We undertake financial and probity checks for prospective partners and set clear standards for Partner conduct through our franchisee and licensee agreements, including compliance with relevant laws and work, health and safety requirements.</p> <p>We also have monthly and quarterly performance meetings with our Partners, as well as annual reviews. This engagement helps us to maintain a high level of visibility of Partners' businesses. Any compliance issues would generally be identified and managed by our retail teams on a day to day basis.</p>	<p>BGIS is currently contracted to manage and deliver Optus' facility management services across all facilities nationally. This includes services such as cleaning and waste management, landscaping and garden maintenance, and general handyman services.</p> <p>Our contract with BGIS includes a modern slavery clause (described in our 2022 statement). We work closely with BGIS to monitor compliance with relevant contractual obligations, including through monthly reviews and quarterly senior management meetings.</p> <p>Among other steps to manage potential modern slavery risks, BGIS undertakes annual audits of subcontracted providers to verify they are paying their workers appropriately. BGIS' audit for the 2023 calendar year did not identify any concerns in relation to subcontractors servicing Optus sites. BGIS also requires its suppliers to sign an annual statutory declaration confirming workers have been paid in accordance with relevant legislation.</p>



Case Study:

Understanding risks in our Own Brand supply chain

Through our work on the Supplier Engagement Roadmap, we undertook a detailed desktop review of our Own Brand suppliers, including our suppliers for modems, mobile phones, and packaging for our products. This review has supported us to identify key areas where we can work with these suppliers to encourage better modern slavery risk management.

Our desktop review evaluated publicly available information shared by these suppliers in relation to their modern slavery risk management, including whether they report publicly that they:

- Have a policy commitment to respect human rights, including modern slavery, referencing the UNGPs;
- Conduct modern slavery risk assessments;
- Undertake supplier engagement in relation to modern slavery risk management;
- Have a commitment to remediation in line with the UNGPs;
- Have a grievance mechanism to report modern slavery concerns; and
- Undertake training for workers on human rights, including modern slavery.

Through this process, we identified an opportunity to continue to work with our Own Brand suppliers to encourage them to ensure they have implemented effective grievance mechanisms to enable the safe reporting of modern slavery concerns by workers and other stakeholders. We have commenced development of a grievance mechanism guidance document for our suppliers, including our Own Brand suppliers to support our work in this area. See further information about this work on page 39.



Training

Training is a key component of our modern slavery response because it helps us to ensure our people understand the role they can play in preventing and managing modern slavery risks, including by safely reporting concerns.

During the last reporting period, we reviewed and updated our modern slavery e-learning module to further tailor the content to Optus' context and modern slavery risks. Completion of this module is required learning for all Optus leaders and all staff in certain business units, such as Procurement. The training is also available to all other Optus staff, including retail and franchisee store owners. The Sustainability team monitors completion rates for this training across the business for reporting.

During the reporting period, approximately 9,810 people completed the e-learning module. This included approximately 3,000 permanent staff, as well as other contractors (onshore and offshore) and relevant external services workers. Over the next financial year, we will review the current list of employees required to complete the learning to expand to other relevant employee cohorts.

We also delivered a modern slavery awareness session in June 2023 for staff working in procurement related roles. This session was delivered as a lunch and learn presentation and included information about why modern slavery is relevant to Optus, the requirements in the MSA, Optus' modern slavery risks, and the steps Optus is taking to manage these risks. Further training for category and vendor managers is planned for later in 2024 and additional details on this session will be included in our next statement.



Case Study:

Developing 'palm card' indicators setting out potential modern slavery red flags for Optus staff to be aware of when engaging workers or directly with suppliers

Our work on the Supplier Engagement Roadmap reinforced the importance of ensuring that our workforce understands key modern slavery risks and red flags, particularly those staff who engage directly with workers or suppliers.

During the reporting period we developed a list of 'palm card' modern slavery indicators for relevant Optus staff that engage with third party workers or suppliers. This document highlights potential modern slavery red flags and is intended to be used by relevant Optus staff, particularly those engaging with suppliers in the areas we have identified as higher risk. Our aim is to equip our staff to better identify potential modern slavery by helping to ensure they are equipped to identify and report possible red flags.

We will report on our work to finalise and implement these 'palm card' indicators in our next statement.

Further information about our Supplier Engagement Roadmap development is on page 32.



Collaboration and stakeholder engagement

We see collaboration with our business peers and other stakeholders as key to building and maintaining a strong response to modern slavery. During the reporting period, we continued to contribute to the development of collaborative, business-led responses to modern slavery through three key forums. This included attending a number of meetings and events throughout the reporting period.

Forum	How we engage	How this engagement has supported our modern slavery response
<p>UN Global Compact Network Australia (UN GCNA) Modern Slavery Community of Practice</p>	<p>As a signatory to the UN Global Compact since 2007, we are committed to upholding its 10 principles including human rights and labour issues. As part of this commitment, we actively participate in the UN GCNA, including its Modern Slavery Community of Practice. The Modern Slavery Community of Practice is a small, interactive forum with membership from a range of Australian businesses and meets quarterly. It aims to provide a collaborative forum to support Australian businesses to manage and communicate modern slavery risks and develop good practice responses.</p>	<p>Optus' membership of the Modern Slavery Community of Practice has helped us to better understand various other industry sector practices, challenges and learnings on how we can improve our modern slavery risks.</p>
<p>Telco Together Foundation</p>	<p>Optus is a member of the Telco Together Foundation (TTF), an industry network that brings together 21 telecommunications organisations operating in Australia.</p>	<p>Our actions to manage modern slavery risks through an industry wide approach. During the reporting period, we worked with the Telco Together Foundation to explore the scope to use third party data providers. We also explore with our TTF industry colleagues areas such as mapping areas of our supply chain beyond Tier 1 and assessing industry and purchase risk.</p>
<p>The Groupe Speciale Mobile Association (GSMA)</p>	<p>The GSMA represents the interests of mobile operators worldwide, bringing together more than 750 operators and approximately 400 companies in the broader mobile ecosystem. As a global member led organisation, Optus (through its Singtel's membership), has opportunities for collaboration on a range of topics, such as modern slavery and human rights, providing valuable insights and enabling members to work towards common goals.</p>	<p>We continued to engage with GSMA over the reporting period about broader sustainability issues.</p>

Grievance mechanisms and remediation

In line with the UNGPs, we are committed to providing for, or cooperating in, remediation where we identify that we have caused or contributed to human rights harm, including modern slavery. This commitment is set out publicly in our Optus Human Rights Statement.

The reporting channels that we have in place provide an avenue for workers in our operations and supply chains who have a concern about modern slavery to safely make a complaint. We understand that these mechanisms can only be effective if they are trusted and accessible and we continued to promote the Optus Whistleblower Hotline and other methods for raising concerns through relevant materials over the reporting period.



Case Study:

Developing a guidance document for suppliers on operating effective grievance mechanisms for modern slavery concerns

We have identified that there is an opportunity to engage with our Own Brand and other suppliers to support them to implement and maintain effective grievance mechanisms to enable the safe reporting of modern slavery concerns by workers and other stakeholders.

We are developing a guidance document for suppliers on operating effective grievance mechanisms, which will draw on the expectations set out in the UNGPs and provides a practical checklist suppliers can use to self-assess their response. The final version will also outline Optus' expectations for suppliers in this area.

We will report on our actions to finalise and implement this initiative in our next statement.



Case Study: Workers' Awareness of Reporting Channels

We continued in person visits to our overseas Customer Success contact centres in India and the Philippines during the reporting period.

During these visits, we have introduced a formal site audit tool which includes asking a small sample of contact centre workers about their awareness of reporting channels that could be used to safely report any concerns, which could include complaints about their working conditions.

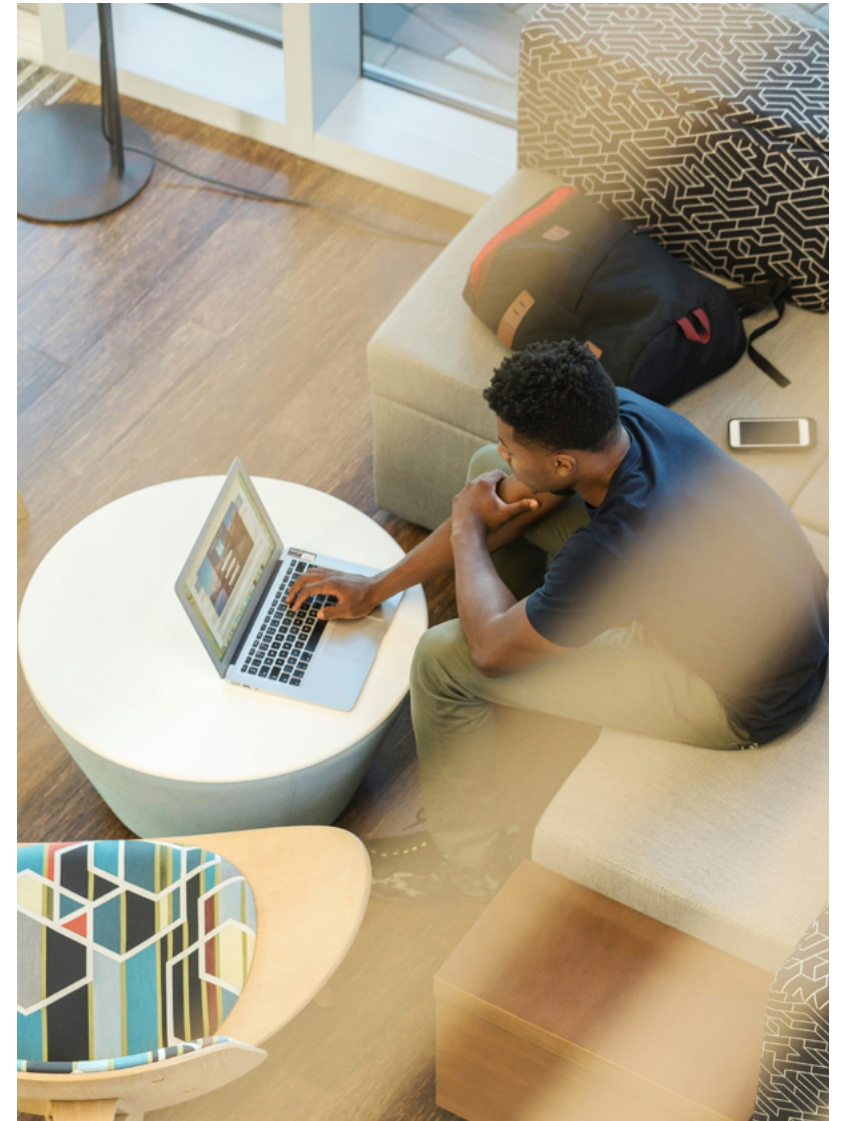
Initially, workers' responses suggested that the levels of awareness may differ, but awareness appears to have been steadily increasing. Feedback from Optus staff undertaking these visits indicates that there has been an increase in the promotion of reporting channels to workers by Customer Success contact centre operators, such as through posters, screensavers, and emails. There have also a number of instances where workers in overseas Customer Success contact centres have utilised the Optus Whistleblower Hotline to report concerns. However, none of the matters raised in the reporting period related to modern slavery. We will continue to work with our contact centre providers to support the promotion of grievance channels going forward.

Site visits may also include 'fireside chat' style sessions or more open forum events to help solicit direct worker feedback about their experiences.

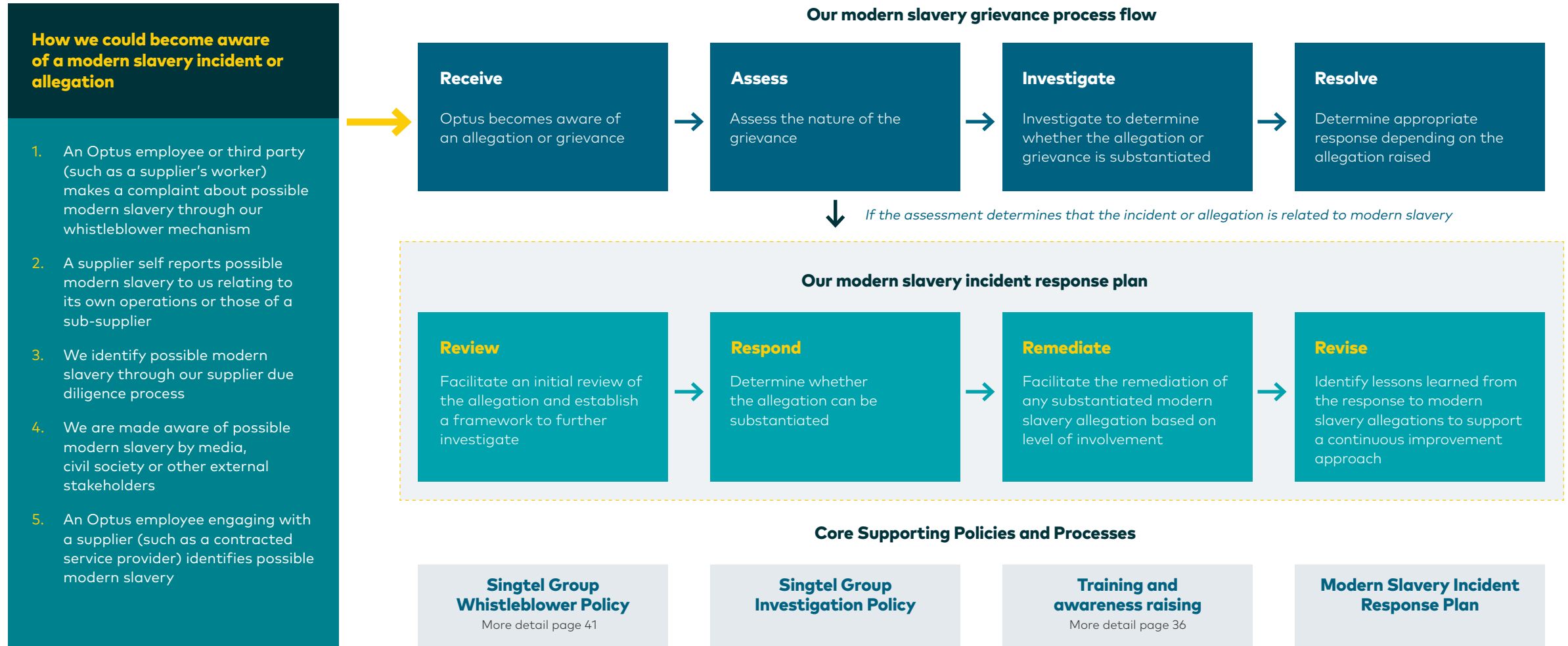


Our Whistleblower Hotline

<p>What it enables</p>	<p>Reporting of any unethical and inappropriate conduct or concerns, such as fraudulent, corrupt or illegal activity, including any potential complaints related to modern slavery. The hotline service is operated in accordance with the Singtel Group Whistleblower Policy, which provides all whistleblowers with protection from detrimental conduct, such as reprisals and retaliation.</p>
<p>Who can use it</p>	<p>All Optus employees and company officers, partners and their employees, contractors and authorised representatives of suppliers and suppliers' workers, people that used to be in one of these groups and family members of any person in one of these groups.</p>
<p>How it operates and how complaints can be raised</p>	<p>Optus' whistleblower process provides multiple channels for complainants to lodge reports. These include via email, online portal and phone number to our designated whistleblower service provider, members of the Optus Internal Audit team, and persons or parties identified in the Singtel Group Whistleblower Policy as Eligible Recipients for complaints concerning Optus. The persons designated as Eligible Recipients include designated members of the Optus senior leadership team, the designated Whistleblower Investigations Officer and Whistleblower Protection Officer for Optus, members of the Optus Internal Audit team, certain specific roles such as Optus General Counsel, and certain external parties as required by the law in Australia concerning whistleblowing.</p>
<p>Safeguards</p>	<p>The Singtel Group Whistleblower Policy contains safeguards to protect the confidentiality of complaints and to protect complainants from detrimental conduct, such as retaliation. The Policy allows complaints to be reported anonymously and we commit that we will never attempt to establish a complainant's identity. The structure in place allows for confidential communication with a complainant through a portal that protects anonymity.</p>
<p>How many modern slavery complaints were received through this hotline in FY24</p>	<p>All complaints received through the whistleblower hotline were investigated and none were related to modern slavery.</p>



Our approach to grievance management



4.

Assessing our effectiveness



We understand that maintaining a strong response to modern slavery requires a continuous improvement approach. Measuring the effectiveness of our actions to assess and address modern slavery risks is a key part of the continuous improvement cycle and helps us to identify opportunities to refine and improve our response.

How our modern slavery response has evolved since 2019

In addition to the activities set out in this statement for the reporting period, we have achieved a range of key milestones in our modern slavery risk management since 2019. Tracking our effectiveness helps us to improve and build on our response both now and into the future.

2019-20	Undertook modern slavery risk assessment of suppliers using expert third party	Established modern slavery working group	Developed modern slavery action plan to guide response	Revised contract clauses to address modern slavery
2020-21	Launched Human Rights Statement	Implemented modern slavery e-learning module	Revised Supplier Code of Conduct to address modern slavery	Signed Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery
2021-22	Undertook salient human rights assessment with expert third party	Developed Modern Slavery Incident Response Plan	Delivered targeted modern slavery training to over 100 Optus team members	Rolled out targeted supplier questionnaire
2022-23	Enhanced our modern slavery e-learning module	Commenced development of a Supplier Engagement Roadmap	Conducted a detailed review of an Own Brand modern supplier and also engaged with a uniforms supplier to better understand their modern slavery response.	

4. Assessing our effectiveness

We consider that an effective business response to modern slavery involves multiple elements. These elements include: a meaningful understanding of potential or actual modern slavery risks across the business' operations and supply chains; the capacity to address these risks through practical actions, such as meaningful supplier engagement and collaboration with stakeholders; and the development of processes to remediate or cooperate in the remediation of any modern slavery-related harm the business identifies it has caused or contributed to. We currently assess the effectiveness of our response against a range of quantitative and qualitative criteria, as set out below:

Effectiveness criteria	How this criterion helps us understand effectiveness
The successful implementation of action items under our Modern Slavery Action Plan	Tracking our progress in this area helps us identify areas of our response that are progressing well and areas where further work may be required
The number of targeted (role specific) staff who have completed our modern slavery e-learning module and feedback from staff who have completed other training sessions, including the e-learning	Tracking the number of staff who complete training and any feedback assists us to understand levels of modern slavery awareness across our business and where there are opportunities to further tailor training to address key knowledge gaps
Completion rates for our supplier questionnaires and any supplier feedback about the questionnaire process	Tracking the implementation of our supplier questionnaires and any supplier feedback supports us to understand whether the questionnaires are fit for purpose and identify opportunities to further refine the process
The number of modern slavery-related complaints reported to our Whistleblower Hotline (or other channels) and whether any cases were substantiated	Tracking the number of modern slavery related complaints received and whether any cases were substantiated helps us to assess whether our grievance mechanisms are able to identify and respond to modern slavery incidents or allegations and whether we are able to meaningfully investigate and address any complaints
Any feedback from our suppliers, staff, business partners or other stakeholders	Internal and external feedback helps us to understand different perspectives on our modern slavery response and identify opportunities for continuous improvement
Information about good practice provided through collaborative forums such as the UN GCNA Modern Slavery Community of Practice and the Telco Together Foundation that can be used to benchmark our own processes	Participation in collaborative forums helps us to continually improve and better understand how our response compares to key peers across the telecommunications sector and more broadly with the aim of adopting other best practice initiatives. Optus representatives participate in the quarterly Roundtable discussions.

We track our performance against these criteria through both internal and external mechanisms. Internally, we leverage the expertise in our Modern Slavery Working Group to monitor and seek internal feedback on the impact of our actions. Externally, we welcome feedback from our suppliers, staff, business partners, expert advisors and other stakeholders. We also draw on collaborative forums such as the UN GCNA Modern Slavery Community of Practice and the Telco Together Foundation to consider good practice and identify areas where we can improve our response. We acknowledge that measuring the effectiveness of our actions is complex and we will continue to look for opportunities to expand and strengthen our approach to measuring effectiveness.

Case Study:

Benchmarking of our modern slavery reporting

In early 2024, we engaged a specialist business and human rights advisory firm to undertake a benchmarking exercise evaluating our modern slavery reporting and reporting of a selected peer. The aim was to identify key areas for improvement in our reporting which we could consider in the drafting of this statement.

We presented the results to our Working Group and have used this process to understand how our reporting aligns with external stakeholder expectations and to support us to further improve our reporting, including providing additional detail on our identification and assessment of risks.

More broadly, this benchmarking has also allowed us to compare our response with our peer to understand how we could enhance the effectiveness of our own actions.



5.

Consultation

Consultation to develop Optus' Modern Slavery Statement

Reporting entities (and other controlled entities) covered by this Statement all share the same company secretary, whose team was consulted in developing the Statement, including reviewing draft versions of the Statement.

The overall development of the Statement was led by the Working Group, which includes representatives from key functions across the Optus group relevant to modern slavery risk management, including Sustainability, Finance, Legal, Procurement, Risk, Internal Audit, People & Culture, Customer Success and Customer Solutions. The Working Group members contributed to and reviewed drafts of the Statement. This consultation process helped to further ensure that the statement reflects the modern slavery risk exposure and risk management activities of the reporting entities and owned and controlled entities covered by the statement.



Consultation on Optus' modern slavery response

In addition to consultation to prepare the Statement, Optus continued to consult internally on the implementation of our broader modern slavery risk management processes throughout the reporting period. Our Working Group provides the primary mechanism for cross-functional consultation, but we also engage with other business units as required.



Appendices

Appendix 1: How our statement addresses the mandatory reporting criteria

Modern slavery act requirement	Reference in this Statement
Identify the reporting entity	
Describe the reporting entity's structure, operations and supply chains	Our structure, operations and supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Identifying our modern slavery risks
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	Identifying our modern slavery risks Our actions to manage our modern slavery risks
Describe how the reporting entity assesses the effectiveness of such actions	Assessing our effectiveness
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Consultation
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Our progress to date (including future plans)



Appendix 2: Reporting entities

The reporting entities covered by this joint statement are:

- Singtel Optus Pty Limited: Provision of telecommunications services
- Optus Networks Pty Limited: Provision of telecommunications services
- Optus Mobile Pty Limited: Provision of mobile phone services
- Optus Internet Pty Limited: Provision of services over hybrid fibre co-axial network and national broadband network
- Optus Satellite Pty Limited: Provision of satellite services
- Alphawest Pty Limited: Provision of information technology services
- Ensys Pty Limited: Provision of cloud services
- Alphawest Services Limited: Provision of information technology services
- Optus Wholesale Pty Limited: Provision of services to wholesale customers
- Optus Satellite Network Pty Limited: Provision of satellite services
- Optus C1 Satellite Pty Limited: Provision of satellite services
- Optus ADSL Pty Limited: Provision of telecommunication services
- Optus Vision Pty Limited: Provision of telecommunications services
- amaysim (Amaysim Mobile Pty Limited): Provision of mobile phone services





Yes

Yes OPTUS