

Modern Slavery Statement Apr23 - Mar24

NCSI (Australia) Pty Limited



About modern slavery

Modern slavery is the severe exploitation of a person for personal or commercial gain by another party. It refers to practices including forced labour, child labour, debt bondage, slavery and slavery-like practices, and extends to instances involving force, coercion, deception or abuse of power. As an example in practice, modern slavery can occur where a person is forced to work without pay to settle debts or is forced to work through intimidation and violence.

Additionally, the term 'modern slavery' can also include other unlawful activities that have adverse effects on human rights, such as corruption and environmental damage.

NCSI (Australia) Pty Limited (hereinafter "**NCSI AU**") recognises that modern forms of slavery can occur in any industry across the world, with significant consequences for victims and negatively impacts on global business and markets. As a commercial entity, NCSI AU recognises its responsibility to respect human rights and take steps to eradicate modern slavery and the associated risks.

We are strongly committed to delivering our services in a manner that upholds human rights and protects the fundamental dignity of workers. NCSI AU actively works to identify and mitigate risks associated with modern slavery.

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the *Modern Slavery Act 2018 (Cth) (Act)*.

Reporting entity

This Statement describes the initiatives undertaken by NCSI AU and its controlled entities to assess and address the risks of modern slavery in our business operations and supply chain.

Reporting entity name	NCSI (Australia) Pty Limited
ABN	38 089 983 317
Registered office	Level 4, 10 Shelley Street Sydney NSW 2000
Industry	Information technology and telecommunication
Controlled entities of the reporting entity	<ul style="list-style-type: none"> - Dialog Pty Ltd (ABN 16 010 089 175) and its related bodies corporate as defined in the <i>Corporations Act 2001 (Cth)</i>; - Riley Solutions Pty Ltd (ABN 79 144 694 977); - Eighty20 Solutions Pty Ltd (ABN 23 618 019 355); - NCS AU Pty Ltd (ABN 78 626 006 111) (NCS AU) and its related bodies corporate as defined in the <i>Corporations Act 2001 (Cth)</i>.
Reporting period	1 April 2023 – 31 March 2024



Structure, operations and supply chains

Our purpose at NCSI AU is to make tomorrow together. We advance our communities by partnering with governments and enterprises to harness technology. We do this by bringing people together to make extraordinary happen. Through our commitment to quality, our focus on people and by challenging traditional thinking, we believe that technology services can be done better. Our people bring this to life by advising, transforming and managing technology to help our clients and communities.

NCS Pte Ltd (NCS), a wholly owned subsidiary of Singapore Telecommunications Limited, and owner of NCSI AU, has undertaken a range of acquisitions in Australia over the last three years:

- ARQ Group Enterprise Pty Ltd was acquired in May 2022 (which was renamed to NCS AU Pty Ltd in June 2024);
- Dialog Pty Ltd and its subsidiaries were acquired in April 2022; and
- Eighty20 Solutions Pty Ltd and Riley Solutions Pty Ltd were acquired in late 2021.

NCSI AU is the Australian holding company which owns all NCS's subsidiaries in Australia facilitating the Australian operations to function on a self-sufficient basis. Please note, **NCS AU is our prime operating and contracting entity** to engage with our customers and suppliers. We will continue to provide structure updates in future statements

Operations

With NCS's above mentioned acquisitions, NCSI AU's workforce has grown to approximately 1,500 employees, with offices across Sydney, Melbourne, Canberra, Brisbane, Adelaide, Perth and Darwin. The company's focus is on meeting the increasing demand for digital transformation, leveraging partnerships with cloud providers like Google and Microsoft to provide end-to-end solutions.

Since April 2023, focus has shifted from acquisition, to effectively integrating our Australian entities operations, to the "One NCS" operating model. As part of this, we are working to standardise our policies & processes, including Modern Slavery.

Supply chain

NCSI AU directly engaged multiple suppliers during the reporting period, primarily for provision of software, hardware, network support for our data and call centres and digital platforms. We also procured indirect suppliers and service providers in limited capacities to provide hardware and software, professional services, security, catering, cleaning, office maintenance and other business-related services.

Our suppliers are primarily based in Australia, United States of America, Nigeria, Singapore, Philippines and India. As part of integration activity, we are consolidating vendors under a single procurement process.



Risks of modern slavery practices

NCSI AU is committed to fostering a transparent, robust supply chain that is free from any modern slavery. As part of Singtel Group, we are subject to their [Human Rights Statement](#), in particular **their position on Labour Rights and Prohibition of Modern Slavery**.

NCSI AU acknowledges the potential presence of modern slavery risks within our operations and supply chain. We recognise we may be susceptible to the presence of modern slavery risks through:

- **Hired workforce:** While the risk is minimal, as NCSI AU's employees are primarily based in Australia, we remain committed to adhering to local labour laws and ensuring strict compliance. We have implemented robust systems to monitor and ensure compliance with these requirements for our directly employed personnel.
- **Direct suppliers:** We understand that risks of modern slavery can exist within NCSI AU's network of direct suppliers who provide products and services. To assess these risks, we consider social and political conditions in countries where our suppliers operate, as well as industry and procurement categories that may carry inherent risks.
- **Indirect suppliers and supply chains:** NCSI AU is aware that modern slavery risks can extend to indirect suppliers and their associated supply chains, and we recognise the potential for such risks. We are committed to identifying and mitigating these challenges, so our supply chain remains transparent and free from modern slavery practices.

Geographical risks

Through our direct engagement with international suppliers based in, e.g., United States of America, Nigeria, Singapore, Philippines and India, we identified geographical risks that may contribute to modern slavery. To provide context, it is important to note that the [Global Slavery Index](#) identified



10 countries with the largest estimated absolute numbers of people in modern slavery. India, Nigeria and the Philippines are among the countries listed as of high-risk.

Industrial risks

In consideration of the industries in which NCSI AU operates, technology-based companies generally experience significant challenges in slavery risk management relating to debt-bonded labour and forced labour. Given our utilisation of technical network support for our data and call centre support as part of our operations, we recognise there are potential areas that may present modern slavery risk where they involve lower-skilled workers such as migrant workers who may be vulnerable to modern slavery.

Indirect suppliers – raw materials

‘For many companies, raw material procurement will not take place from a direct, tier one, supplier. This reduces the visibility over raw materials in the supply chain.’ – Global Slavery Index (2018)

NCSI AU does not manufacture products from raw materials as part of its operations, though our hardware providers may utilise suppliers of this nature. For example, a high-risk area for the technology industry is the sourcing of tin, tantalum, tungsten, and gold commonly used in electronic devices.

Actions to assess and address modern slavery risks

Key focus objectives

- 1) In 2023, we developed and published a customised ‘Modern Slavery Awareness’ training module. All our people are required to complete this, annually. The module provides context and detail to explain the risks of modern slavery and provides options to report any suspected instances.
- 2) As part of integration, and integration with our wider organisation, we have implemented a centralised process to conduct due diligence background checks on all new vendors. The screening checks for any reported adverse news, which would include publicly available reports on **modern slavery convictions or human rights violations**. This screening check is **mandatory** for all new vendors we engage.

Supplier agreements

In relation to new and renewing suppliers, we take the following approach to include appropriate modern slavery protections within formal engagements:

- (a) The supplier agreement provided by a supplier is reviewed by NCSI AU’s legal team (and where appropriate, NCSI AU’s external lawyers); or



(b) New suppliers are provided with NCSI AU’s standard contractual terms.

Our standard contractual terms impose a duty on our suppliers to ensure their practices do not contribute to the risks of modern slavery. Specifically, vendors are contractually obliged to comply with the Singtel [Supplier Code of Conduct](#), which includes specific provisions for Modern Slavery.

Audits

We did not perform any audits of suppliers during the reporting period, as we did not identify any instances of non-compliance relating to modern slavery. Detailed audit provisions are built into contractual obligations for suppliers as per our standard contractual terms, enabling audits to be performed by NCSI AU, as well as granting us the ability to audit suppliers on breach of contract for the purposes of remediation.

Training

As mentioned previously, we have extended our Modern Slavery Awareness training to all employees across Australia. Completion is mandatory, on an annual basis.

As previously reported, as part of the integration of NCSI AU, we implemented an updated internal incident reporting (“whistleblower”) process. This aligns with Singtel Group’s overarching Whistleblower [Policy](#), ensuring a comprehensive framework for identifying and addressing concerns related to modern slavery.

Internal policies

NCSI AU have implemented the following internal policies that support our modern slavery and human rights initiatives:

Singtel Group Human Rights Statement	The Singtel Group Human Rights Statement applies to Singtel and its wholly owned subsidiaries which includes NCSI AU. It sets out the commitment to upholding and protecting the human rights of all individuals through a culture of respect, trust and inclusion in our organisation and supply chains, regardless of backgrounds, beliefs and abilities, maintaining a zero tolerance for modern slavery in all forms.
Code of conduct	The Supplier Code of Conduct is based on NCSI AU’s organisational values and represents our commitment to uphold ethical business practices and to meet our legal obligations.
Whistleblower protection policy	The whistleblower protection policy is designed to instil the values of accountability to customers, suppliers, peers, managers and team workers. It emphasises the integrity of our processes and procedures and encourages treating others with respect, courtesy and professionalism. The policy aims to foster a culture where any officer, employee or contractor feels empowered to speak up about



potential misconduct concerns, including suspected modern slavery, without facing any form of detriment.

Supplier Due Diligence

A company-wide mandatory third-party Supplier Due Diligence process for NCSI AU's subcontractors, suppliers and vendors (collectively referred to as "Suppliers") has been put in place by the procurement team to help NCSI AU to adopt a proactive approach to managing compliance risks associated with NCSI AU's engagement with third-party Suppliers.

Supplier contract agreements

The standard contract conditions in our Vendor Contract policy set out mandatory obligations for our third-party suppliers, including compliance to Singtel Code of Conduct, which includes our position on Modern Slavery.

Further considerations

NCSI AU are conscious of the need for improved transparency within our supply chain and are committed to ongoing process improvements and training. To further mitigate modern slavery risks, NCSI AU has considered (and where appropriate, started implementing) the following areas for improvement:

1. **Supplier Due Diligence:** during the previous reporting period, we implemented a new, centralised process to conduct Due Diligence on all new suppliers. We will continue to work closely with the Due Diligence team to identify ways we can further enhance the screening process.
2. **Supplier On-going Assessments and Audits:** as part of a planned pro-active approach, we plan to instigate an annual due diligence check on all existing vendors. This will be co-ordinated by our wider organisation.

By considering these areas and developing our processes further over the next reporting period, we aim to strengthen our commitment to minimising the risk of modern slavery from our supply chain. We anticipate that all our people will integrate onto a single procurement platform within the next reporting period.

Assessing the effectiveness of our actions

Modern Slavery Awareness

All our people are required to complete Modern Slavery Awareness training, on an annual basis. Completion is actively tracked and managed.

Supplier agreements

In any case of modern slavery non-compliance by a supplier, our standard contractual terms provide grounds for termination.



Reporting

If an employee or representative of NCSI AU has concerns that a supplier may be involved in modern slavery practices, we have mechanisms in place to facilitate reporting of these concerns. We have adapted Singtel Group's Whistleblower policy, which provides an additional, independent reporting channel. Concerns raised are tracked and actively investigated.

Independent audit

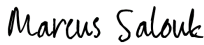
We have not yet conducted an independent review of our modern slavery initiatives. However, NCSI AU acknowledges the importance of such a review and will continue to assess the necessity of engaging an external auditor or non-government organisation to undertake this process.

Consultation with entities the reporting entity owns or control

NCSI AU has worked with various key internal stakeholders, including legal counsel, procurement function and GRC (Governance, Risk and Compliance) team to prepare this statement.

This statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) and outlines the initiatives implemented to assess, evaluate and address the risks of modern slavery in NCSI AU's business operations and supply chain during the reporting period ending 31 March 2024.

In accordance with the Act, this modern slavery statement has been approved by the board of NCSI AU (its principal governing body) and is signed by a responsible member of NCSI AU:

Signed by:

D0A471A84C6E4DC.....

Marcus Salouk

NCSI (Australia) Pty Limited - Country Lead and Director

Date: 27 September 2024