

**OPTUS**

# Modern Slavery Statement



## About this Statement

This Modern Slavery Statement has been made by Singtel Optus Pty Limited (Optus) on behalf of the Optus group of companies (in its capacity as the parent operational company of the Optus group of companies) and covers the FY20 financial year (1 April 2019 – 31 March 2020).

The Optus business operates through various entities, some of which hold carrier licences or other key strategic assets, and others which operate to serve the whole Optus group, such as the entity which employs Optus employees.<sup>1</sup> The Optus group of companies share the same policies and processes, and the overall activity of the Optus group is overseen by the executive management team and the Board of Directors of Singtel Optus Pty Limited.

Accordingly, this Modern Slavery Statement is a consolidated description of the actions taken to address modern slavery risks by the Optus group of companies 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).

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

This Statement has been prepared to meet the mandatory reporting criteria set out under the MSA. The table below identifies where information relating to each mandatory reporting criterion can be found in this Statement.

MSA Criteria	Page
Identify the reporting entity	About this Statement: <a href="#">page 2</a>
Describe the reporting entity's structure, operations and supply chains	Our Structure, Operations and Supply Chain: <a href="#">page 8</a>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Supplier Risk Assessment Results: <a href="#">page 14</a> COVID-19 Case Study: <a href="#">page 16</a>
Describe actions taken to assess and address these risks, including due diligence and remediation processes	Risk Assessment and Management: <a href="#">page 12</a> Policy and Governance: <a href="#">page 10</a> Due Diligence: <a href="#">page 17</a> Raising Concerns: <a href="#">page 20</a>
Describe how the reporting entity assesses the effectiveness of these actions	Measuring Effectiveness: <a href="#">page 19</a>
Describe the process of consultation with entities you own or control	Consultation: <a href="#">page 22</a>
Provide any other relevant information	Chief Executive Officer's Message: <a href="#">page 4</a> Introduction: <a href="#">page 7</a> Telecommunications Industry Collaboration: <a href="#">page 23</a> Looking Forward: <a href="#">page 24</a>

<sup>1</sup> The subsidiaries of Singtel Optus Pty Limited that are reporting entities under the Modern Slavery Act 2018 (Cth) are separately listed at the end of this statement.



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# Chief Executive Officer's Message



Optus champions and invests in building a better future for all. We respect the human rights and freedoms of every individual and believe there is no place for modern slavery in our world.

Our foundations were built on empowering people with the option to make a choice. Today, this is further embedded in our new company purpose – To Power Optimism with Options. Building trust and a culture of respect and inclusiveness continue to remain core principles in how we operate and shape positive sustainable change for our business, people, customers, communities, the environment and the broader market and value chain we operate in.

**In this digital age, we know the positive role communications and technology can play in helping people voice their rights and enabling access to services.**

We also acknowledge that there can be unintended negative consequences and risks in our industry and the broader value chain we operate in, one of which would be issues of human rights. This is something the management and Board takes seriously as part of our commitment to the United Nations Guiding Principles on Business and Human Rights. Our business, people and partners will be provided the required support to ensure we mitigate any risk of modern slavery in our operations and our supply chain.

Our first modern slavery statement reflects a practical view of where we are on the journey, our commitment, approach and our progress and actions thus far. We recognise there is more work to be done in the coming years as we deepen our engagement and due diligence for modern slavery risks in our extended value chain.

This statement was approved by the Board of Singtel Optus Pty Limited.

Kelly Bayer Rosmarin  
Chief Executive Officer  
Singtel Optus Pty Limited

December 2020

# Me

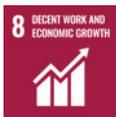




# Introduction

Optus respects the human rights of all individuals regardless of who they are, what they believe, their abilities or where they live. Across our operations and supply chain, we aim to work in partnership with organisations who uphold and demonstrate the same principles in their practices.

We have been a signatory to the United Nations Global Compact since 2007, and as such we commit to its 10 principles on human rights, labour, environment and anti-corruption. We're also committed to implementing the United Nations Guiding Principles on Business and Human Rights (UNGPs), the authoritative global standard to address business impacts on human rights. We support the United Nations Sustainable Development Goals (SDGs), which includes Goal 8: decent work and economic growth.



We have integrated social and environmental sustainability into the way we do business, and this year we published our first [Human Rights Statement](#) which articulates our approach and commitments to human rights, including preventing and addressing any modern slavery risks.

During FY20, we progressed our commitment to human rights in a number of areas, with many of these improvements being finalised and implemented after our FY20 reporting year. This included:

- Revising our contractual terms with our suppliers and franchised stores
- Updating our Supplier Code of Conduct to include anti-slavery clauses
- Commencing a modern slavery working group
- Developing a modern slavery roadmap and action plan focused on continued improvement.

This statement provides details of our approach, policies, progress and plans to further strengthen our commitment to ensuring respect for human rights and freedom from modern slavery of any kind. We recognise there is more work to be done and see this as a continuous journey of improvement.

# Our Structure, Operations and Supply Chain

## Our structure

Optus is the second largest provider of telecommunications services in Australia in terms of revenue and employs more than 7,000 people nationally, who together are a reflection of our multicultural country and diverse customer base.

As a fully integrated telecommunications provider with more than 10 million customers, we deliver a comprehensive range of products and services, including:

- Mobile
- National and long-distance services
- Local telephony
- Business network services
- Internet and satellite services
- Internet television.

We also offer insurance services (for mobile telecommunications equipment) which are provided by a separate Optus entity (Optus Insurance Services Pty Limited).

The Optus 4G network provides coverage to 97.3% of the Australian population, and rollout of the 5G network has commenced. Optus has a separate Board of Directors to the ultimate parent company, Singtel Telecommunications Limited (Singtel), and this separate Board has oversight of the business and assets of the Optus group of companies. For more information about Optus and the Singtel group, please see the [Singtel Annual Report 2020](#).

Optus owns and operates the majority of its own network infrastructure, but we also use some wholesale services of third parties such as the Australian National Broadband Network, and have some shared mobile tower infrastructure with other operators like TPG-Vodafone. We provide services both directly to end users, and also act as a wholesaler to other service providers.

**Optus' network offers an advanced technology platform capable of delivering integrated communications, information and entertainment services.**

**7,000+**  
Team members



**10m**  
Customers



**300**  
Store locations



## Our operations

The Optus headquarters are in Macquarie Park, New South Wales, with offices and retail outlets across all states and territories of Australia.

Optus delivers a comprehensive range of services and products to the Australian retail telecommunications market and small and medium-sized businesses, as well as advanced communications solutions to corporate and government customers in Australia. The nationwide Optus retail network operating under the Optus brand includes proprietary, franchisee, and licensee stores, which are located in over 300 locations to provide more Australians with easy access to high quality telecommunications services and solutions.

In addition to our 7,000+ employees, we have over 600 contractors who work within our Australian business operations providing professional or administrative services, and 13,000 outsourced contracted staff who are employed and managed through third party contact centre providers in India and the Philippines.

Our customer facing business groups are supported by corporate functions including Networks, Human Resources, IT, Legal, Audit, Risk, Regulatory, and Finance.

## Our supply chain

Optus has a large and highly diverse vendor base, and procures a range of goods and services both domestically and internationally. In FY20, this represented approximately 1,629 direct suppliers and vendors.

There is significant diversity within what we spend on suppliers: we have a smaller number of suppliers that we have significant spend with, and a large number of suppliers with whom our spend is relatively small. Additionally, Optus also sources from several large international businesses, who make up a significant portion of Optus' supplier spend.

Within our supply chain, 80% of our spend is with the top five supplier categories listed below. Within these categories, we have 120 key Tier 1 suppliers with whom we have a direct contracting relationship with.

1. Devices
2. Networks Technology and Equipment
3. Technology Professional Services
4. Building and Construction
5. Professional Services

Of these top five spend categories, Optus' largest spend is on devices – such as mobile phones and tablets. Optus does not manufacture these products but procures them directly from the manufacturer for resale to our retail and business customers.

Optus has a centralised procurement team which manages the majority of supplier spend throughout the organisation by category and across key business functions.



# Policy and Governance

Our approach is to empower our people across all departments and divisions with the necessary tools and processes to help identify, mitigate and address human rights risks, including modern slavery risks.

## Policy and procedures

Optus has policies and procedures in place which underpin the way we engage with suppliers. These include:

- Procurement Policy
- Supplier Code of Conduct
- Contractual Terms and Conditions
- Supplier qualification process.

In recently reviewing these, we have identified areas for further improvement to support the ongoing continuous improvement in the way we engage with suppliers and address modern slavery risks.

We commenced the development of our Human Rights Statement in 2019 to articulate our human rights approach, commitments and the values and behaviours we uphold at Optus. This includes prohibiting child labour and modern slavery in any form.

Our [Supplier Code of Conduct](#) was updated after this statement's reporting period, and expressly includes anti-modern slavery expectations. To do business with Optus, all suppliers must confirm their acceptance of, and comply with, our Supplier Code of Conduct.

## Strengthening our supplier and operational agreements

One of the major ways in which we are able to ensure our business partners understand our expectations, including in relation to modern slavery risks in our business operations and supply chain, is through our contracting process and contractual terms. Our business partners include suppliers, franchisees and licensees, small to medium business channel partners, and Optus Enterprise partners.

Throughout 2019 and 2020, in consultation with our Modern Slavery Working Group, we reviewed a range of contracts and added anti-modern slavery provisions. The roll-out of agreements with the inclusion of these provisions, has been occurring progressively from 2019 onwards, as suppliers and other business partners enter into new agreements with us. These provisions define modern slavery by reference to the regulations and laws in force in Australia. 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. We ask our suppliers for access to reports, information and documents, including the completion of a self-assessment questionnaire to assist us in monitoring ongoing compliance.

Importantly, our suppliers are asked to notify us upon becoming aware of any modern slavery issue occurring in their organisation or supply chain. During the statement reporting period, we did not receive any such notifications.

## Governance

We have formed a Modern Slavery Working Group that includes senior stakeholders from across the business to help implement our Modern Slavery Action Plan.

The Modern Slavery Working Group is supported by the Vendor and Supply Chain Risk Management Executive Steering Committee which reports into the Optus Executive Risk Committee, chaired by our CEO and comprising the Optus Executive Committee (ExCo). The ExCo has oversight of – and is required to endorse – all related actions, recommendations and policies including the Human Rights Statement, which supports the implementation of our Modern Slavery Action Plan.

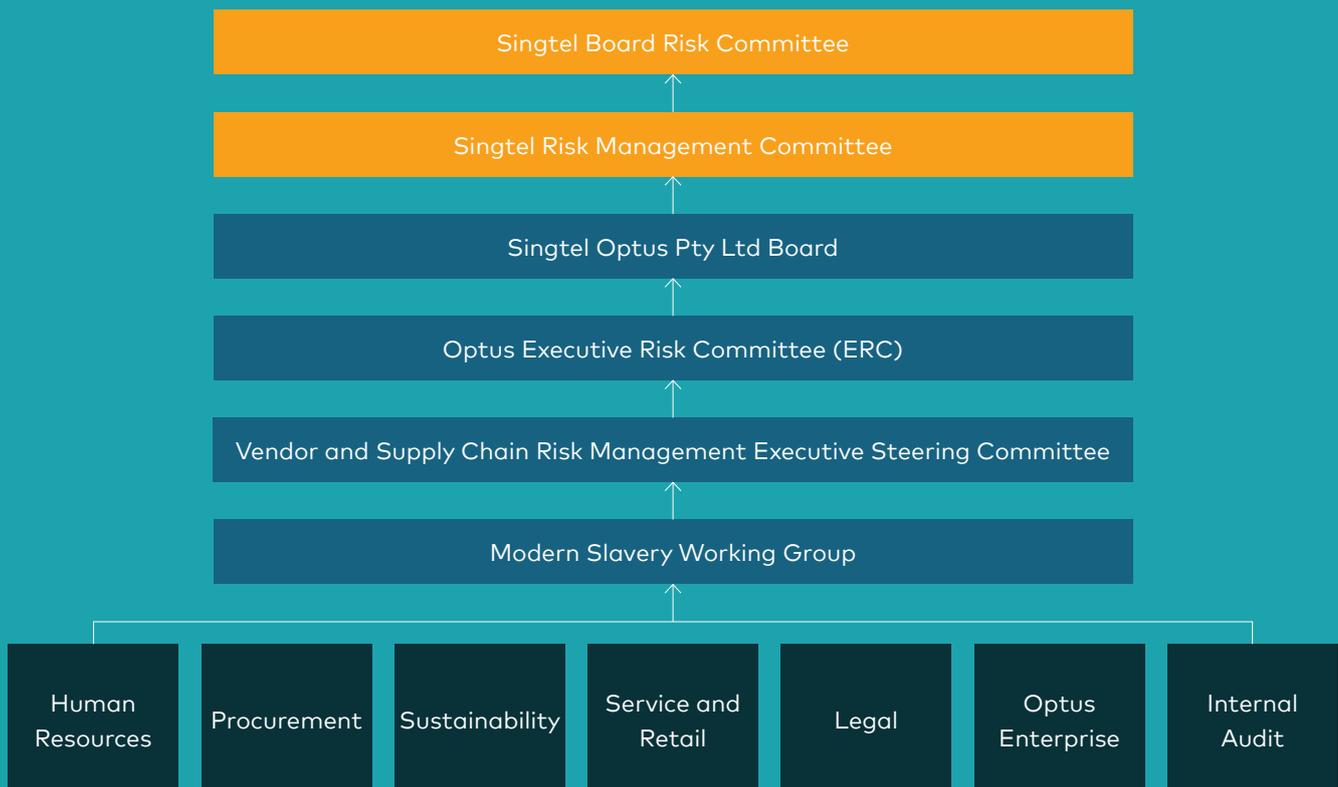
The Optus group of companies are wholly owned subsidiaries of Singtel. All key risks, including vendor and supply related risks, are also managed within the Singtel group risk framework which includes

being reviewed and reported to the Singtel Risk Management Committee (RMC). The RMC supports the Singtel Board and the Singtel Risk Committee (RC) in terms of risk governance and oversight in line with the Singtel group's risk appetite and risk tolerances.

Optus Group Sustainability is responsible for leading the Optus Modern Slavery Working Group and Action Plan, in collaboration with key stakeholders, and makes recommendations and progress updates to the RMC, the Optus Executive Risk Committee and the Board of Directors of Singtel Optus Pty Limited, as required.

### Modern Slavery and Human Rights Governance

Optus' Modern Slavery Statement, Human Rights Statement, Action Plans and progress has been reviewed and discussed, and will continue to be at the most senior levels within the business including the Optus Executive Committee, Optus Board and Chairman.



# Risk Assessment and Management

To guide our approach and Modern Slavery Action Plan, we have adopted a human rights framework based on the UN Global Compact's human rights principles and the UNGPs. This framework includes key elements of human rights due diligence as elaborated in the UNGPs, as well as a process to know and show that we are respecting human rights in our own activities and through our business relationships.

## Optus Human Rights Framework



We are taking concrete steps to enhance our supply chain management program – steps that are designed for impact and positive difference in the way in which we prevent and address modern slavery.

Last financial year, Optus established a program to focus on improving the ongoing management and visibility across our supplier base. We see this program as being fundamental to our operations and the way we continue to improve moving forward.

In the establishment of this program, we identified that a thorough risk assessment and segmentation process across our supply chain was required to better understand our current risk exposure, including modern slavery.

To support this process we engaged ELEVATE, a global business risk and sustainability solutions provider, to undertake a risk assessment of our 1,629 suppliers based on global risk and supply chain databases. This assessment enabled Optus to better understand both product and category risk exposures as well as inherent country risk relating to each supplier.

Each supplier was assigned a risk and strategic importance rating based on key data inputs from both internal and external data sources. These ratings determine the supplier “category” or segment for prioritised action.

- Country risk was determined by looking at inherent country risk scores based on where our direct suppliers are geographically located. The scores use a blend of inherent country risks from public domain data (e.g. World Bank, Global Slavery Index), which take into account vulnerability, prevalence and protections related to modern slavery and ELEVATE’s proprietary risk scores based on annual audit data (including audit findings related to ILO Forced Labour Indicators)

- Supply category risk was determined by assessing the goods and/or services supplied by the Optus supplier, specifically the human rights vulnerabilities and incidences of forced and child labour associated with the production/supply chain of those specific goods and/or services. This data is based on publicly available sector trend information and the US Department of Labour’s List of Goods Produced by Child Labour or Forced Labour.

Following this, to further understand the relationship of those suppliers to Optus – including understanding the greatest opportunities to address potential risks – we undertook strategic importance calculations looking across three key variables: overall spend, spend change, and duration of relationship.

Overall spend was the leading metric influencing this part of the categorisation. We understand that spend may not be a determinative factor for a supplier that is higher risk for involvement in modern slavery for other reasons, however we found it helpful in understanding our ability to influence more responsible business conduct, in line with the UN Guiding Principles on Business and Human Rights.

While the results of Optus’ risk assessment identified the majority of Optus’ suppliers fall in the minimum risk category, we have also identified a small number of suppliers that pose a higher risk of potential modern slavery issues in their supply chain. These higher risk suppliers will be targeted as part of the engagement and assessment process in the next stage of work, to assess their policies, approaches, due diligence and how they may have managed such risks or incidents in their operations or value chain. We may also undertake direct audits or work with third party auditors to obtain these assurances where there is potentially higher risk, in a similar way to how we have undertaken due diligence in our supply chain for issues such as customer data protection and worker health and safety.



## Supplier risk assessment results

Of those suppliers categorised as moderate to higher-risk, we have identified that our greatest potential exposure is with suppliers in the following categories of goods and services:

1. Construction and maintenance support equipment
2. Electrical equipment and components and supplies
3. Electrical wire management devices and accessories

As the next step, our procurement group will engage with these higher risk suppliers to ascertain their policies, processes, and governance of modern slavery risks in their operations or supply chain to assess the need for further audits or interventions by Optus.

We also recognise that modern slavery risks could occur in our operations, particularly by third party providers who provide services such as cleaning and waste removal, where we have less visibility than we do with our employees.

Many of these suppliers may employ people who have recently arrived in Australia, which could include vulnerable groups that can be susceptible to exploitation due to lack of understanding of their rights. Based on this, the next phase is to engage these suppliers to develop a deeper understanding of their labour practices and to reinforce our expectations.

## Our suppliers



**Technology  
Professional Services**



**Devices**



**Building and  
Construction**



**Professional  
Services**



**Networks Technology  
and Equipment**



## Partnering with our contact centre providers in India and the Philippines to manage risks to contracted employees

We recognise that there is a higher potential risk of worker exploitation in some overseas countries more than others. Our contact centres are located in the Philippines and India, so we work closely with our contact centre providers in those countries to ensure that they meet the requirements of our Supplier Code of Conduct, comply with local government laws and regulations and have policies in place to prevent any activity occurring that might constitute modern slavery.

For example, we work with our contact centre providers in the Philippines and India to ensure their code of conduct promotes equitable employment, offers grievance channels, encourages and protects whistleblowers and provides protection to employees from workplace bullying and sexual harassment.

Policies covered in their code of conduct include:

- Not employing children under the age of 18
- Protection of women and children, including domestic violence leave; and
- No forced labour implemented in any form.

In addition, we undertake regular site visits and operational audits covering areas such as health and safety and cyber security, with no adverse reports.

At the start of the COVID-19 pandemic, lockdown restrictions in the Philippines and India had a significant impact on the contact centre providers. As telecommunications was deemed an essential service, we took steps to rebuild our capacity to provide customer care services whilst working with the contact centre providers to manage risks to their employees. Ensuring the safety and wellbeing of the people was the priority for Optus and our contact centre providers.

Together with our contact centre providers, a range of options were implemented, including:

- Setting up contact centre 'microsites' located close to employee homes that enabled them to comply with local travel distance restrictions
- Provided a work environment with social distancing and other health requirements such as temperature screening, and provision of face masks and hand sanitisers
- Dedicated transport to the main contact centre locations as an added safety measure
- Organised and subsidised accommodation close to the main contact centre locations for employees that were not within reasonable distance of a microsite, or who didn't want to live at home during the COVID-19 lockdown – for example, if they had elderly relatives living with them
- Employees were given these options to be able to attend a contact centre location, however they were not penalised if they chose not to.

# Due Diligence

Optus has a complex supply chain spanning different industries and multiple suppliers. We maintain committed to continuously understanding our supplier risks, and ensuring that we continue focusing our efforts in understanding what types of human rights risks may exist in our supply chain and operations.

Our supplier risk management strategy begins as part of the sourcing and onboarding process during the pre-qualification phase, and extends through to an ongoing risk assessment. These assessments cover all suppliers who want to do business with Optus, and in addition to modern slavery risks, they also cover anti-corruption, bribery and other aspects of business integrity.

Over the last several months we gained further visibility into our risks by undertaking further assessments and reviews to identify, understand, assess and address them as part of our due diligence processes. As part of our existing supplier

onboarding process, all new and existing suppliers must undergo a detailed supplier assessment process. The screening and supplier assessment process involves cross-functional collaboration with key stakeholders from across the business. Depending on the size, scale, and risk profile of the supplier, the level of the screening will vary, particularly for higher risk categories.

Optus has been evaluating ways to improve this process and is currently working to enhance existing risk processes and controls. This evaluation looks across our entire supplier base and across the end-to-end supplier lifecycle. As part of this work, we are reviewing our overarching due diligence process for our supplier management approach, including the ongoing identification and mitigation of potential risks, as well as when renewing or extending a relationship with a supplier. This work will complement the framework in place whilst also strengthening our supplier position and management approach.

## Overview of Optus Supplier Assessment Process

### Step 1

#### Supplier Code of Conduct

The Optus Supplier Code of Conduct communicates our specific expectations of suppliers as a condition of business to support the company's commitment to responsible sourcing.

### Step 2

#### Self-Assessment Questionnaires (SAQs)

Optus suppliers must complete SAQs as part of the onboarding process. The SAQ provides Optus with the opportunity to assess the supplier against key criteria to ensure they can comply with key Optus requirements, including Modern Slavery and Human Rights.

### Step 3

#### Supplier Reviews

Supplier reviews enable Optus to monitor expectations, identify improvement opportunities and ensure that suppliers are continuing to comply with expectations.





# Measuring Effectiveness

We report our progress against a range of performance indicators to assess the effectiveness of our policies, programs, practices, and processes. Many of these can be found in [Optus' Sustainability Report](#), with detailed data also included in the [Singtel Group Sustainability Report](#). Below is a summary of some of these:

- This year's employee sentiment score from our annual employee "Your Voice" engagement survey was 80% – an eight-point increase from the previous year. One of the highest drivers of staff engagement is our company's approach to environmental and socially responsible business practices, and a culture that is respectful of diversity and inclusion in the business and community
- The average number of training hours per employee and total investment made in training
- Health and safety of our people and contractor safety management, including workplace injury frequency rate and absenteeism rate
- Number of complaints reported to our Whistleblower Hotline and how many cases were substantiated
- During 2020, we engaged external consultants to undertake a risk assessment of our suppliers which included modern slavery and identified areas where we can further improve our modern slavery risk identification across our supplier categories
- Developed a Modern Slavery Action Plan against our adopted human rights framework to guide our focus
- Formed a cross-company Modern Slavery Working Group to continually improve our processes and practices, and provide greater visibility of modern slavery risks within current Optus risk governance structure
- Implemented a number of actions (which continued during 2020) to help address, mitigate and manage modern slavery risks which are highlighted throughout this Modern Slavery Statement, including:
  - Updating our operational and supplier contractual agreements
  - Developing our Human Rights Statement
  - Expanding our Whistleblower Hotline to include reporting issues relating to modern slavery, and
  - Updating our Supplier Code of Conduct
- Obtained external specialist support to assess and provide feedback on our Modern Slavery Action Plan and our Statement of Approach and Commitment to Human Rights.

We will continue to include new measures of reporting as we progress with our Modern Slavery Action Plan.



# Raising Concerns

Optus has a number of channels that employees can use if they wish to raise any concerns. This includes speaking to their manager or leader in the first instance, and if this isn't appropriate, they are encouraged to speak to their next level leader or to Human Resources.

The Singtel Group Whistleblower Policy is in place and applies to the management of whistleblower complaints at Optus. The policy covers reporting of concerns through a number of channels, including the Optus Whistleblower Hotline.

The Optus Whistleblower Hotline offers a place to report any unethical and inappropriate conduct or concerns such as fraudulent, corrupt, illegal activity, or a complaint related to modern slavery. Complaints to the Whistleblower Hotline can be made anonymously, and we have appropriate measures in place to protect any whistleblower. All allegations received are investigated by an independent and objective investigation team.

The investigations are conducted to maintain both the confidentiality of the matter investigated and to protect the identity of the whistleblower. The outcomes of investigations, but not the whistleblower's details, are reported to Optus senior management. Under the policy, all whistleblowers are protected from detrimental conduct, such as reprisals and retaliation.

During FY20, we received two reports of concerns regarding allegations of improper conduct that potentially had modern slavery-related implications. Neither case was substantiated, and investigations confirmed that neither raised a modern slavery concern.

For more information visit [Optus' Whistleblower Policy](#).





# Consultation

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The Optus group of companies use common shared services and are supported by centralised procurement and sustainability teams. As a result of this structure, discussions between the various representatives of the Modern Slavery Working Group and other key internal stakeholders have included consultation with colleagues across the Optus group of companies and the businesses that operate through them.

The Modern Slavery Working Group includes representatives from procurement, sustainability and legal, and their consultation has included business stakeholders who are responsible for taking specific and agreed actions to ensure that modern slavery risks are being appropriately identified, assessed and addressed.

Briefings have been provided to the Boards of Singtel Optus Pty Limited and Optus Insurance Services Pty Limited (OIS), which relies on a third party for claims management. Ongoing briefings to these boards will be provided as part of ongoing risk reporting to these bodies.



# TELCO INDUSTRY — FIGHTING — MODERN SLAVERY

## RESPECT FOR HUMAN RIGHTS

We acknowledge and respect human rights in our operations and supply chains, and understand the importance of identifying and addressing human rights impacts.



## COOPERATION ACROSS OUR VALUE CHAIN

We seek to cooperate across our value chain, in areas where we can add more value than working independently; to identify issues, share insights, and continually learn.

## TRANSPARENCY ACROSS SUPPLY CHAINS

We understand the complexity of supply chains and, subject to law, will undertake to share insights, aiming to increase transparency, visibility and facilitate cooperative responses.

## FIGHTING MODERN SLAVERY

We acknowledge the risk of modern slavery and harm to people as a key driver for business action, to be considered along with other risks such as financial, market, operational or reputational risk.

## EMPOWERING OUR SUPPLIERS THROUGH PARTNERSHIPS

We recognise the importance of working in partnership with our suppliers to mitigate risks, supporting them in their efforts to address modern slavery in their own supply chains.



# Our contribution to the telecommunications industry leadership against modern slavery

Optus is a founding member of the Telco Together Foundation, a unified platform which brings together 21 of the leading telecommunications organisations operating in Australia.

Modern slavery was identified as an area that as an industry, we can make a bigger impact working together as we provide essential connectivity to every business, home and individual in Australia.

We recognised that our influence comes in part from being an industry that represents annual revenues of over \$40 billion and employs more than 70,000 people. Through collaboration on a Modern Slavery Industry Impact Hub, the Foundation has been developing best practice approaches and case studies, assessment tools and training.

Since 2019, Optus has been an active participant and contributor to this Impact Hub and helped to shape the Telco Together Foundation Industry Statement. This industry approach complements Optus' own actions to combat modern slavery.

We will continue to work with the Foundation to identify areas where a unified approach can facilitate greater progress in helping end modern slavery practices.



# Looking Forward

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Optus recognises that our approach to modern slavery risk management is an ongoing process, and one which will continue to be enhanced in the coming years. In the year ahead our priorities are:

- Further strengthening our Supplier Management Framework and Governance, and enhancing our approach to supplier due diligence, monitoring and management, performance measurement, and audit requirements
- In addition to our onboarding supplier self-assessment questionnaire (SAQ) that all suppliers receive, we will improve and deploy our detailed updated SAQ to the following:
  - Priority vendors
  - Specialised vendors
  - Moderate vendors
- Launch modern slavery e-learning modules for people leaders and staff to increase education and awareness about modern slavery
- Increase awareness of Optus' Whistleblower Hotline amongst contracted service staff and overseas contact service centre providers through dedicated material
- Continue to implement our Modern Slavery Action Plan to ensure continued alignment and assessment of our practices against the requirements of the MSA.





# OPTUS

The subsidiaries of Singtel Optus Pty Limited that are reporting entities under the Modern Slavery Act 2018 (Cth) include the following entities: Optus Networks Pty Limited, Optus Mobile Pty Limited, Optus Internet Pty Limited, Optus Satellite Pty Limited, Alphawest Pty Limited, Ensysy Pty Limited, Alphawest Services Limited, Optus Insurance Services Pty Limited, Optus Wholesale Pty Limited, Optus Satellite Network Pty Limited, Optus C1 Satellite Pty Limited, Optus ADSL Pty Limited, and Optus Vision Pty Limited.