Modern Slavery Statement 2021

Contents

About this statement

This modern slavery statement (**statement**) is a joint statement prepared pursuant to the *Modern Slavery Act 2018* (Cth) (**MSA**) covering TPG Telecom Limited (ABN 76 096 304 620) (the ultimate parent company in the TPG Telecom group of companies (the **TPG Telecom Group**)) and the other reporting entities within the TPG Telecom Group listed in *Appendix 1* (together referred to throughout this statement as **TPG Telecom**, **we**, **us, our** or **the reporting entities**). This is our 2021 statement for the financial year ended 31 December 2021 (the **reporting period**). Information provided in this statement is correct as at 31 December 2021.

Consultation with the reporting entities

This statement was prepared by the TPG Telecom Human Rights and Modern Slavery Working Group, which includes senior managers from Risk, Compliance, Sustainability, People Experience, Procurement and Legal. For information on the governance framework and review process refer to page 12 of this statement.

This statement was developed through engagement and consultation with all business units within TPG Telecom. The business units cover the operations of all TPG Telecom reporting entities. The reporting entities' operations all fall within the organisation structure, governance framework and executive management responsibilities of TPG Telecom. This statement has been approved by TPG Telecom Limited's Board of Directors, which is the principal governing body of TPG Telecom, on behalf of the reporting entities.

Appendix 2 details how our statement has complied with the mandatory reporting criteria for statements, as set out in the MSA.

Acknowledgement of Country

We acknowledge the Traditional Custodians of Country throughout Australia and the lands on which we, and our communities live, work and connect. We pay our respects to their Elders, past, present, and emerging.

2021 Highlights

Provided training to all senior management, finance, and procurement team members

Issued Modern Slavery Supplier Assessment Questionnaires to vendors **representing 90% of our spend**

Collaborated across our industry, through the Telco Together Foundation, to implement a shared supplier risk profiling tool

Updated relevant precedent supplier contracts (including our precedent procurement terms & conditions) to include terms and conditions to **reflect our expectations** on management of modern slavery risk

Message from the CEO

Iñaki Berroeta, CEO & Managing Director

At TPG Telecom, the way we do business is guided by our purpose and values. We are committed to conducting our business in an ethical and socially responsible manner and we support human rights consistent with the Universal Declaration of Human Rights.

We respect and reflect those rights in the ways we conduct our operations and stand with local and international efforts to stop modern slavery and continue to seek opportunities to help support and promote their work.

Modern Slavery is a serious human rights violation and can exist in the supply chains of many industry sectors, including telecommunications.

We have a zero-tolerance policy against modern slavery and the use of coercion, threats or deception to exploit victims and undermine or deprive them of their freedom.

We expect our suppliers and all with whom we have commercial dealings to conduct their businesses and provide their products and services in accordance with our policy, regardless of the type and value of business we do together.

In 2021, we made strong progress to deliver on the market potential and synergies following the merger of Vodafone Hutchison Australia Limited (now TPG Telecom Limited) and TPG Telecom Limited (now TPG Corporation Limited) in July 2020. We completed the first steps of integration to unify our operations, while staying focused on delivering leading customer service, looking after our people, and strengthening our financial position. These achievements have also allowed us to better understand our operations and our complex supply chain, which will aid us in more effectively managing the risk of modern slavery.

This is our second Modern Slavery Statement. It outlines the steps we have taken to identify and mitigate the risks of modern slavery and details our approach and actions we have taken during 2021 to further strengthen our programs and commitments to respect and uphold people's fundamental rights and freedoms.

Through industry collaboration and our own efforts to build internal capability and knowledge, we are committed to continuously improving our processes to bring about positive change to address modern slavery.

Iñaki Berroeta

Chief Executive Officer and Managing Director,
TPG Telecom Limited

June 2022

About TPG Telecom

Our Structure, Purpose and Values

TPG Telecom Limited, formerly named Vodafone Hutchison Australia Limited, was listed on the Australian Securities Exchange (ASX) on 30 June 2020. On 13 July 2020, this newly listed company merged with TPG Corporation Limited, formerly named TPG Telecom Limited, to bring together the resources of two of Australia's largest telecommunications companies, creating the leading challenger full-service telecommunications provider.

Post-merger TPG Telecom Limited is the ultimate parent company in the TPG Telecom Group and the immediate parent of TPG Corporation Limited. TPG Corporation Limited, a reporting entity for the purposes of the MSA, is the holding company of the balance of TPG Telecom Group's reporting entities under the MSA.

We believe that with the increased scale and opportunity flowing from the merger, comes an even greater accountability to act as a responsible and sustainable business, and that doing so will be fundamental to the creation and protection of long-term value. We aim to do business in a way which responds to the needs and expectations of all our stakeholders – including our customers, employees, shareholders, regulators, and our wider society.

As a full-service telecommunications company, our nationwide mobile and fixed networks are connecting Australia for the better. It's why **our purpose is to build meaningful relationships and support vibrant, connected communities**.

During 2021, we updated our values to better reflect our merged organisation. Our values guide how we think and behave, what we prioritise, and the experiences we create for our customers and communities every day.

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

Stand together
Together we are unstoppable.

- We're inclusive and open-minded.
- We connect with empathy.
- We make it happen together.

Own it
We step up and own what we do.

- We believe change starts with us.
- We get it done with pride and care.
- We can be counted on and trusted.

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

- We embrace simple.
- We make the complicated easy.
- We create time for what matters.

Boldly go
We are hungry, curious and brave.

- We think big and ask ourselves "what if?"
- We win or we learn.
- We make a difference.

TPG Telecom at a Glance

tpg TELECOM

vodafone

TPG

iinet

Internode

LEBARA

AAPT

felix

Australia's second-largest
fixed voice and data network

$1.73b
earnings before interest, tax, depreciation and amortisation (EBITDA)

City Wi-Fi networks
in Adelaide, Ballarat, Bendigo, Canberra and Melbourne

7,000km
submarine cable connecting Sydney to Guam, and onward to the US and Asia

A leading mobile network
comprising more than 5,600 sites covering over 23 million Australians

28,000km+
Metropolitan and inter-capital fibre networks in Australia

Fibre-to-the-Basement
network in major capital cities

Approx. 5 million Mobile and 2 million Fixed
subscribers

A 5G mobile network
with 90% population coverage in top 12 cities

5,840
employees

Our operations

We operate several leading mobile and internet brands including Vodafone, TPG, iiNet, Internode, Lebara, AAPT and felix.

We provide services directly to end users such as Retail, Enterprise, and Government customers. We also provide wholesale services to other service providers, network providers, content providers and several mobile virtual network operators.
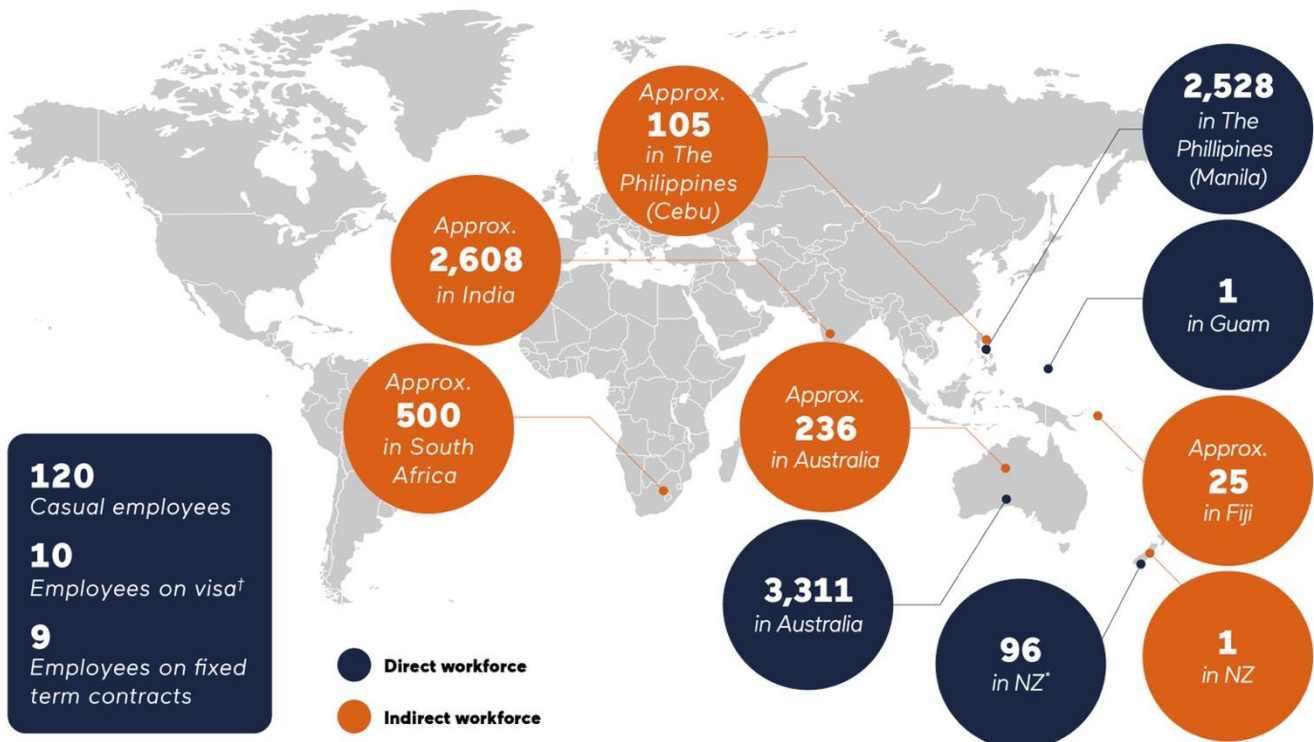
We use wholesale network services of third parties such as the National Broadband Network (NBN) and we share and lease certain mobile tower infrastructure with other operators.

We have intercarrier relationships with domestic and international network partners to ensure inter-operability of mobile services globally, including over 500 relationships with international roaming partners.

We also have a retail network across Australia comprising around 100 company-owned stores, as well as over 250 stores run by approximately 100 Dealer partners.

TPG Telecom has 5,840 employees across Australia, Guam and the Philippines. Our direct workforce includes employees based in corporate offices, contact centres, retail stores and field-based employees working in network and fibre operations throughout Australia. In addition, we have an indirect workforce based in India, Fiji, Philippines and South Africa that includes customer service agents, network operations and technology support agents.

While the majority of our workforce are permanent employees, we do employ a small number of staff on a casual basis, on fixed-term contracts and through working visas.

Approx. **105** in The Philippines (Cebu)

2,528 in The Phillipines (Manila)

Approx. **2,608** in India

1 in Guam

Approx. **500** in South Africa

Approx. **236** in Australia

Approx. **25** in Fiji

120 Casual employees

10 Employees on visa[†]

9 Employees on fixed term contracts

3,311 in Australia

96 in NZ*

1 in NZ

● Direct workforce
● Indirect workforce

* New Zealand contact centre was closed during the reporting period.
† Excluding Permanent Residency visas

Our supply chain

TPG Telecom procures wide-ranging goods and services to operate our fixed and mobile infrastructure and service our customers.

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

We have approximately 1,436 active vendors. While 90% of our procurement spend is with vendors based in Australia, we acknowledge our direct suppliers often have offshore manufacturing operations and their own tiers of domestic and international suppliers. This results in a deep, complex supply chain that comprises many tiers.

The majority of our procurement spend is allocated to the following categories of goods and services:

- devices and modems, including mobile phones, tablets, routers, and modems which are sourced from large multinational companies and on-sold to our customers;
- network technology, equipment and construction, including goods and services procured to build and operate the fixed and mobile network infrastructure; and
- professional services, largely including spend on advisory support for strategic operating and technology integration programs which continue post-merger.

Following the merger, TPG Telecom established a centralised procurement function to manage key suppliers (excluding intercarrier and international roaming partners).

In 2021, we embedded the procurement governance framework across the TPG Telecom Group to oversee the way we engage and manage our suppliers, including:

- standardising the procurement policy;
- rolling out standard contractual procurement terms and conditions; and
- issuing the supplier code of conduct to existing and new suppliers.

We continue to improve procurement processes post-merger through our Enterprise Resource Planning (ERP) system upgrade to automate supplier qualification, sourcing, contracts and purchasing processes. This will enable us to strengthen our modern slavery risk management through improvements to supplier due diligence, category management and sourcing decisions.

Understanding and managing modern slavery risks

Risk management framework

The TPG Telecom risk management framework has been leveraged to develop our approach to modern slavery risk management in line with the human rights due diligence UN Guiding Principles on Business and Human Rights.

Our modern slavery risk management framework consists of the following elements:

- **Leadership** including clear accountabilities and governance structures to manage modern slavery risks as outlined in the section on Governance on page 12;
- **Capability** including adequate processes and systems to identify modern slavery risks as well as training programs to educate our people;
- **Performance** includes review and reporting of the effectiveness of our modern slavery initiatives and controls and tracking of Key Performance Indicators; and
- **Resilience** including processes to identify, remediate and respond to modern slavery related incidents.

While we established the foundations of this framework in 2021, we intend to continue evolving and maturing processes and systems in 2022.

Risk assessment

Since the merger, we have conducted extensive risk workshops across the TPG Telecom Group to identify potential modern slavery risks within our operations and better understand our higher risk areas throughout our supply chain.

As part of this assessment, we considered the following:

- **Sector and industry risks** – assessed via analysis of the different categories of spend we track across our operations;
- **Product and services risks** – assessed via the top categories of spend for products and services acquired during the year;
- **Geographic risks** – assessed via analysis of our key suppliers and their primary country of operation; and
- **Entity risks** – assessed via our supplier due diligence processes which includes sanctions checks as well as adverse media reports relating to modern slavery.

This analysis assisted us to identify the areas within our operations with a higher potential risk of modern slavery.

We acknowledge there are other vendors we utilise which may not be material with respect to our spend, however do represent a high-risk sector for modern slavery such as cleaning and security. For these suppliers, we follow our standard due diligence process for procurement of all goods and services as outlined below, as well as the issuance of our updated procurement terms & conditions and Supplier Code, both of which set out our expectations in relation to anti-modern slavery.

Areas within our operations with a higher potential risk of modern slavery

1. **Procurement of electronic products and equipment** such as mobile devices, tablets, modems, equipment and accessories which are on-sold to our retail and enterprise customers. These products are sourced from major multinational companies including Apple, Samsung and Nokia. We recognise there may be modern slavery risks within the often-complex supply chains and manufacturing operations that support the delivery of the end product. This area will be a focus of the vendor mapping and risk profiling tool we expect to utilise in 2022 to better understand the risks in our supply chain below our tier 1 suppliers. Refer to page 15 on industry collaboration for further details.

2. **Construction and building works** across parts of our network infrastructure and facilities operations. Our mobile and fixed network construction activity is based in Australia, which is considered relatively low risk in terms of modern slavery. However, we recognise that there is potential for workers in these areas (i.e., non-permanent workers, including visa holders and migrant workers) to be considered vulnerable to exploitation. We employ a very small number of fixed term contractors, employees on a visa and casual workers as outlined on page 8. We recognise risks also exist in the sub-contracting of construction activities, and we manage such risks through our robust internal procurement processes outlined in the due diligence section on page 14.

3. **Customer support and operations at higher risk geographies** – Our customer operations are supported by a large direct workforce based in the Philippines as well as an indirect workforce through our outsourced contact centres based in India, South Africa, Philippines, and Fiji. Our largest outsourced contact centres in India and South Africa have annual compliance programs in place including training, pulse checks, control reviews and audits. In addition, in 2021, we updated our contracts with our two largest outsourced providers to include clauses on modern slavery.

COVID-19

COVID-19 continued to impact the world through 2022, and may have increased the risk of modern slavery, particularly for vulnerable workers. Local and international government restrictions on the movement of people have impacted millions of workers worldwide through workplace closures, reduced operating hours and loss of income.

Keeping our people, customers, and the public as safe as possible continued to be our highest priority during the pandemic. Over the last two years, we have kept our employees regularly informed of changes impacting them or the business. Our Australian and Philippines based corporate offices and contact centres effectively transitioned to remote working in response to government restrictions, while front-line employees (Retail & Field Operations) were considered 'essential workers' and continued business operations with support from the Health and Safety team.

We have implemented a range of initiatives to help support our people's health and wellbeing. In addition to providing paid pandemic leave, in 2021 we introduced paid leave blocks of three hours for COVID-19 vaccination and booster appointments. The TPG Telecom COVID-19 Vaccination Policy was also introduced to further protect our people and contractors in roles in Australia where there is increased risk of infection due to the requirements of the work. For these roles, the policy specifies our people and contractors require to be fully vaccinated (the definition of 'fully vaccinated' is based on relevant ATAGI guidance).

We recognise our operations and suppliers' operations in some overseas geographies can present a higher level of risk. In 2021, we continued working closely with our strategic, outsourced, overseas contact centre service providers to ensure that their people (our indirect workforce) were effectively supported through COVID-19. This included support to work remotely, COVID-19 vaccination drives, medical support, and pandemic leave. COVID-19 has also resulted in global supply chain issues, and we continue to work proactively with our suppliers to identify and manage the impact on our operations.

We understand our responsibility to support our customers and communities through major incidents and natural disasters including COVID-19. Our approach to customer wellbeing through the COVID-19 pandemic is outlined in our 2021 Sustainability Report available on our website: www.tpgtelecom.com.au.

Governance

Our highest level of responsibility for modern slavery sits with the TPG Telecom Board of Directors (the **Board**), which has oversight of strategy, business performance, compliance, and risk management, including in relation to modern slavery. The Board has established the Audit and Risk Committee to assist in its oversight of an effective risk management framework, including as it relates to modern slavery risk management.

At an operational level, our progress on modern slavery has been driven through a dedicated Human Rights and Modern Slavery Working Group, led by the General Manager Risk and Audit with representation from Sustainability, People Experience, Procurement and Legal teams.

This working group is responsible for ensuring the TPG Telecom Group achieves its long-term plan for contributing to ending modern slavery and implementing the required initiatives across the TPG Telecom Group. The performance of this working group is overseen by the Sustainability Council, comprising of senior leaders across the business, who are responsible for overseeing the TPG Telecom Sustainability Strategy. For more information on our Sustainability Strategy refer to our website: www.tpgtelecom.com.au/sustainability.

TPG Telecom is committed to identifying the risks of modern slavery within our business and taking meaningful steps to address such risks. A formalised governance structure is in place to oversee Modern Slavery risks and progress made to implement actions.

TPG Telecom Board of Directors (Board)

Audit and Risk Committee (ARC)

Executive Leadership Team (ELT)

Sustainability Council

Human Rights and Modern Slavery Working Group

| Risk & Compliance | Sustainability | People Experience | Procurement | Legal |

Policy framework

We have a range of policies in place which set out the way we work and the expectations of our people and suppliers, as well as the mechanisms available for reporting of issues and concerns where these expectations are not being met. Together this framework of policies outlines our responsibility to respect human rights.

How we go about our business, or the way we do business, is just as important as what we do. How we treat our colleagues, our customers and how we work with the community, is essential in building trust. Being clear about what we expect is important and doing what's right starts with each of our employees. The TPG Telecom **Code of Conduct** is our central policy document, outlining requirements that every single person working at TPG Telecom must comply with, regardless of location or position.

Specifically in relation to human rights, our policy states:

"*We adhere to relevant environmental standards and act responsibly with our business partners to ensure they operate without infringing on human rights. We support human rights consistent with the Universal Declaration of Human Rights and we respect those rights in conducting our operations in all locations. We stand fully behind local and international efforts to stop slavery and human trafficking and look for ways to promote these efforts. We have a zero-tolerance policy against trafficking and activities related to trafficking.*"

There are a number of other policies which make up our policy framework in relation to managing modern slavery. These are outlined in the table below.

RISK AREA	DESCRIPTION OF POLICIES IN PLACE
Supplier Related Policies	• We expect our suppliers and business partners to uphold the same standards and to act ethically, putting our principles into practice in everything they do. The **Supplier Code** sets out the minimum requirements and commitment expected of our suppliers regarding compliance with laws, labour and human rights, business integrity, workplace health and safety, privacy, business continuity and environmental management. TPG Telecom also expects suppliers to respect the fundamental Conventions and labour standards of the International Labour Organization. Under our Supplier Code, we outline that our goal is to only work with suppliers who are compliant with the Supplier Code. • Our precedent **Procurement Terms & Conditions** now include modern slavery clauses which outline our expectations in relation to modern slavery.
People Related Policies	• Our **Respect in the Workplace** Policy outlines our commitment to providing a safe, flexible, and respectful environment for employees and customers free from all forms of discrimination, bullying and sexual harassment. It includes guidance on rights and responsibilities, unacceptable workplace conduct, and resolving issues. • Our **Health, Safety and Wellbeing** Policy recognises our duty to take all reasonably practicable steps to ensure the health, safety and wellbeing of our workers and other persons impacted by our business. It outlines the core components of our Workplace Health and Safety Management System, through which our policy is implemented.
Doing the Right Thing	• Our **Anti Bribery and Corruption** (ABC) policy prohibits bribery, corruption and fraud and is applicable to all our people, in all our operations and locations of operation. This includes compliance with the relevant ABC laws in the relevant country of operation.
Speak Up Mechanisms	• Our **Whistleblower** Policy encourages eligible whistleblowers[1] to speak up if they observe or suspect any improper conduct. It outlines how a report can be made, how we investigate and deal with improper conduct, and how we will support and protect a whistleblower throughout this process. • Our **Grievance Handling** Policy applies to all our people including directors, employees, and contractors, providing a guide on what to do in the case of a grievance, and information on how a grievance is handled including how an investigation works and possible outcomes.

[1] Eligible whistleblowers are as follows: employees; directors; officers; suppliers (and their employees); consultants; and any relatives, dependents or spouses (including dependents of spouses) of our employees, directors, officers, suppliers and consultants.

Due diligence

In 2021, we collaborated with the Telco Together Foundation to develop an Australian Telecommunications Industry Supplier Assessment Questionnaire (SAQ). This SAQ was designed with the aim to identify high risk vendors and areas of risk within our supply chain. The SAQ was issued to our top suppliers representing approximately 90% of our total procurement spend (excluding intercompany, intercarrier and government suppliers). Our learnings from issuing the SAQ and review of the responses received has been used to inform the modern slavery action plan for 2022, which includes utilisation of a common industry platform to enhance supplier risk screening and developing a more rigorous due diligence framework to respond to high-risk suppliers.

The SAQ was integrated within our existing supplier assessment processes for onboarding new vendors and performing ongoing reviews. Our internal procurement process includes a number of pre-qualification checks to identify potential areas of concerns relating to suppliers, including risks relating to modern slavery:

- Vender due diligence processes
- Health, Safety and Environment questionnaires
- Data and information Security assessments
- Economic sanctions checks
- Finance and Tax questionnaires
- Contractual agreements and supplier code of conduct

We value long term partnerships with our suppliers. These strong relationships are the foundation for building trust, transparency, and open communication. Our aim is to work with responsible business partners who share the same commitment to respecting human rights.

Remediation processes

In 2021, we had no instances of modern slavery reported via our grievance mechanisms. As outlined in the policy framework above, we have several speak up mechanisms in place to report any fraud or wrongdoing including instances of suspected or actual modern slavery or other human rights issues. Our Whistleblowing Policy outlines the investigation process including, how reported matters are handled, fair treatment and protections available to whistleblowers.

In addition, we also have an **Emergency and Crisis Management Plan** which has stringent protocols in place for senior management to manage and remediate significant events including if modern slavery related incidents were to occur.

In 2022, we plan to further evolve the grievance and remediation frameworks and processes to ensure we have effective processes in place to identify, respond and remediate any instances of modern slavery in our operations or supply chain.

Training and awareness

We have now provided training to all our senior management, finance and procurement team members on modern slavery risk identification, reporting and remediation. In 2022 we plan to broaden the training and awareness program by developing an e-module and rolling this out across our direct and indirect workplace participants such as Dealer networks and Contract Centre providers.

Industry collaboration

We continue to work with our industry peers on the issue of modern slavery through the Telco Together Foundation – a registered charity that brings together the telecommunications industry to make a significant social contribution within Australia.

In December 2020, we signed an Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery, committing to work cooperatively to eliminate modern slavery practices where they are identified and to share case studies of best practice. That statement includes a set of Telecommunications Industry Modern Slavery Leadership Principles, drawing on best practice standards for business conduct set out in the UN Guiding Principles on Business and Human Rights.

In 2021, we continued our collaboration through the Telco Together Foundation to agree on a shared Modern Slavery Supplier risk profiling tool. This tool is intended to be a common industry platform to assess modern slavery risk in our supply chains, with an industry-based supplier SAQ, and provide additional investigation on any suppliers deemed higher risk. This will not only allow for a more consistent approach to engaging suppliers on this topic, but will likely result in better engagement from suppliers, as they are provided with a more efficient process and set of requirements. The tool is intended to be used as an information source to identify modern slavery risks and to help inform decision making processes and actions. The tool is in the process of being implemented in 2022.

Telecommunications Industry Modern Slavery Leadership Principles

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

2. 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.

3. 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.

4. 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.

5. 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.

A full copy of the Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery can be accessed on the Telco Together Foundation website: https://industryimpacthub.org/modern-slavery/

Assessing effectiveness

The oversight functions noted in the governance framework outline the responsibilities for assessing the effectiveness of our modern slavery risk management progress. In particular, the Human Rights and Modern Slavery working group are responsible for identifying areas of improvement and implementing initiatives in consultation with the various business units to improve modern slavery risk controls. The working group's responsibilities include designing relevant KPIs to monitor adherence to our processes and effectiveness of our controls.

We currently track the following aspects of our modern slavery risk management framework:

- Total number of human rights related grievances reported through our available channels, as well as their outcomes;
- Completion percentage of our modern slavery training; and
- Total number of completed supplier SAQs.

In the second year following the merger, we have continued our program to integrate processes, systems, frameworks and establish one culture. Our procurement function has continued to transform through establishment of a centralised procurement function, rationalisation of vendors, roll out of relevant precedent contractual agreements with modern slavery protections (including procurement T&Cs) and due diligence programs.

We recognise that managing modern slavery risk is a complex process and requires continuous improvement to evolve practices. In 2022, we plan to update our strategic response and action plan to combat modern slavery, including additional key performance indicators to track our progress.

Our collaboration with the Telco Together Foundation and utilisation of the shared industry platform will form a core aspect of our approach going forward. We expect to track the completeness and quality of supplier SAQ responses as well as review any additional risk-related information relevant to those suppliers. Once active, this will form a key component to how we assess the effectiveness of our actions in the future.

For more information on our broader Sustainability strategy and approach to managing our business responsibly please refer to our Sustainability Report available on our website www.tpgtelecom.com.au.

Looking ahead

As we continue to improve our understanding of modern slavery and human rights issues, we continue to strengthen our commitment to improve our processes to combat modern slavery. The table below outlines the progress made on our commitments for 2021 including the initiatives planned for 2022, many of which are underway.

2021 ACTIONS	PROGRESS	2022 OUTLOOK
Governance ● Develop a modern slavery action plan ● Perform an assessment of our modern slavery risk controls to identify opportunities for further improvement	● (Complete) *The Human Rights and Modern Slavery Group was formalised within our governance structure and an action plan to execute initiatives to manage modern slavery risk was created.* *Refer to the section on 'Governance' on page 12*	● Define a long-term strategic plan to combat modern slavery through the development of a roadmap of initiatives and Key Performance Indicators to track the effectiveness of our actions. ● Develop a Human Rights Policy statement to confirm our commitment to human rights and expectations of all our people and suppliers.
Risk Management ● Perform additional due diligence on tier one suppliers identified as being in higher risk categories for modern slavery risk ● Develop and embed a modern slavery due diligence framework, including remediation aligned with existing incident management and whistleblowing procedures	◐ (In progress) *Modern Slavery SAQs were issued to our suppliers and responses analysed to understand risk exposure. However further work is required to understand the complexity and risk within layers of our supply chain.* *Refer to the section on 'Due Diligence' on page 14*	● Implement a common industry supplier assessment tool to perform risk reviews of supplier base to identify suppliers in high-risk category of modern slavery. Following from this, develop a due diligence framework to address higher risk suppliers. ● Develop a strategic action plan with a longer-term outlook on identifying and addressing modern slavery within our operations. ● Improve the modern slavery grievance and remediation frameworks and processes.

● Complete　◐ In progress　○ Delayed

Confidential

2021 ACTIONS	PROGRESS	2022 OUTLOOK

Capability

- Progress implementation of modern slavery training and risk awareness beyond senior leadership to other parts of the organisation

Training was provided to all senior management, Finance and Procurement team members. This training was run by an external specialist in human rights and modern slavery.

Refer to the section on 'Training' on page 14.

- Develop an e-learning module to be accessed by a broader range of direct (i.e., employees) and indirect workplace participants such as Dealer networks and Contact Centre providers.

Procurement

- Continue to integrate procurement processes and supplier arrangements post-merger
- Develop modern slavery protections for relevant precedent contractual arrangements and the procurement process

Relevant precedent contractual supplier arrangements, including T&Cs, were updated to include clauses for modern slavery.

Work continues on integrating procurement processes and systems post-merger.

Refer to section on 'Due Diligence' on page 14.

- Continue to improve procurement practices through standardisation and automation of our systems and processes.
- Continue to update precedent contractual arrangements.

Collaboration

- Continue to collaborate across the industry through Telco Together Foundation to implement the principles of our leadership statement

The collaboration with our industry peers and Telco Together Foundation is an ongoing commitment.

Refer to section on 'Industry Collaboration' on page 15.

- Collaborate with the Telco Together Foundation to implement a common industry supplier assessment tool and progress.

● Complete　◑ In progress　○ Delayed

Appendix 1

Reporting entities

This statement has been prepared as a joint statement pursuant to the MSA covering the following reporting entities:

- AAPT Limited ACN 052 082 416;
- iiNet Limited ACN 068 628 937;
- Internode Pty Ltd ACN 052 008 581;
- PowerTel Limited ACN 001 760 103;
- Telecom New Zealand Australia Pty Ltd ACN 050 060 341;
- Telecom Enterprises Australia Pty Limited ACN 062 920 601;
- TPG Corporation Limited ACN 093 058 069;
- TPG Holdings Pty Ltd ACN 003 328 103;
- TPG Internet Pty Ltd ACN 068 383 737; and
- TPG Telecom Limited ACN 096 304 620.

Appendix 2

MSA criteria

The table below indicates aspects of our statement which relate specifically to the mandatory criteria for modern slavery statements in the MSA.

MSA CRITERIA	RELEVANT SECTIONS OF OUR STATEMENT
Identify the reporting entity.	About this statement (page 3) Our structure (page 6) Appendix 1 (page 19)
Describe the structure, operations and supply chains of the reporting entity.	About TPG Telecom (page 6)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity (and any entities that the reporting entity owns or controls).	Risk assessment (page 10)
Describe the actions taken by the reporting entity (and any entity that the reporting entity owns or controls) to assess and address those risks, including due diligence and remediation processes.	2021 highlights (page 4) Understanding and Managing Modern Slavery Risks (page 10) Looking ahead (page 17)
Describe how the reporting entity assesses the effectiveness of the actions it takes to assess and address its modern slavery risks.	Assessing effectiveness (page 16)
Describe the process of consultation with any entities that the reporting entity owns or controls and, for joint statements, the entity giving the statement.	About this statement (page 3)
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Message from the CEO (page 5) Looking ahead (page 17)