



Waveconn Group Holdings Management Pty Ltd
ACN 660 255 014
as trustee for the Waveconn Group Holdings Trust
Suite 3.03, Level 3
347 Kent Street
Sydney, NSW 2000

MODERN SLAVERY STATEMENT

Waveconn Group Holdings Trust (ABN 84 255 965 208)
Reporting period: 1 January 2023 – 31 December 2023

1. ABOUT THIS STATEMENT

This Modern Slavery Statement is published by Waveconn Group Holdings Trust (ABN 84 255 965 208) (**WGHT**) pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (the **Act**). WGHT is a reporting entity under section 5(1)(a) of the Act. Waveconn Group Holdings Management Pty Ltd (ACN 660 255 014) (**WGHM**) acts as trustee of WGHT.

2. STRUCTURE, OPERATIONS AND SUPPLY CHAINS

WGHT is the principal holding entity of the Waveconn group, comprising WGHM (as trustee) and their subsidiaries (together, the **Waveconn Group**). Waveconn is a portfolio company of OMERS Infrastructure, headquartered at 347 Kent Street, Sydney, with approximately 41 employees as at 31 December 2023.

Waveconn is a neutral host telecommunications infrastructure company that builds, owns and manages digital infrastructure across Australia. Its customers include Telstra, TPG, Optus, government radio networks and wireless internet service providers.

Waveconn's supply chain is predominantly Australian-based, with suppliers across the following categories:

- **Overseas manufacturing:** Steel structures and passive network equipment are sourced from overseas manufacturers.
- **Construction and field services (Australia):** Contractors for tower installation and maintenance.
- **Professional services (Australia):** Legal, accounting and consulting firms.
- **IT and general business services (Australia):** Software, IT systems and corporate office services.

3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Waveconn considers the risk of modern slavery in its direct operations to be low. Waveconn has a small workforce engaged under written contracts, with remuneration at market rates and coverage under the Fair Work Act 2009 (Cth) and works for a select group of subcontractors under written agreements. This assessment applies equally across all entities within the Waveconn Group.

Waveconn has assessed the modern slavery risks across the operations and supply chains of WGHT and all entities it owns or controls, with reference to the risk of harm to people:

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- **Overseas manufacturing (higher risk):** Waveconn sources some goods from overseas manufacturers in jurisdictions including China, where certain manufacturing sectors carry higher modern slavery risks. Workers, particularly migrant workers, may be vulnerable to forced labour, excessive working hours, wage withholding and poor working conditions. This is Waveconn's most significant modern slavery risk.
- **Construction and field services in Australia (lower risk):** The construction industry employs migrant workers and labour hire subcontractors who may be vulnerable to exploitation. Australian workplace protections significantly mitigate this risk.
- **Professional services and IT (low risk):** Predominantly large Australian firms in regulated, professional environments.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the reporting period, Waveconn and the entities it owns or controls took the following actions:

- **Policies:** Waveconn maintains a Modern Slavery Policy (WC-P-17) setting out its zero-tolerance approach, due diligence requirements and reporting procedures, aligned with the Modern Slavery Act 2018 (Cth), Criminal Code Act 1995 (Cth) and Fair Work Act 2009 (Cth). The policy was updated during the reporting period.
- **Supplier audits:** Annual on-site audit of the overseas manufacturing facility, covering modern slavery, sanctions, bribery and corruption risks, including facility inspections and personnel interviews. No instances of modern slavery were identified.
- **Contractual controls:** Supplier contracts require compliance with all applicable laws, including modern slavery, anti-bribery and anti-corruption laws, with termination rights for breach.
- **Governance:** Modern slavery risk is considered through the Board, Audit and Risk Committee, and in consultation with shareholder OMERS risk function. Modern slavery risk assessment is included in quarterly reporting to the Audit and Risk Committee via the Enterprise Risk Report.
- **Whistleblower Policy:** Confidential reporting channels for employees, contractors and suppliers. No modern slavery complaints received during the reporting period.
- **Remediation:** No instances of modern slavery were identified during the reporting period and no remediation was required. If instances were identified, Waveconn would investigate, take appropriate action to address the harm to affected persons, and report through its Risk Forum and Audit and Risk Committee.

5. HOW WE ASSESS EFFECTIVENESS

Waveconn assesses effectiveness through:

- annual supplier audit outcomes (no instances of modern slavery identified)
- whistleblower reports (nil received)
- policy review and updates
- quarterly compliance reporting to the Audit and Risk Committee

Waveconn is committed to continuously improving its effectiveness measures. Waveconn will continue to enhance its supplier risk assessments in future reporting periods.

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6. CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

In preparing this statement, WGHM (as trustee of WGHT) consulted with its subsidiaries across the Waveconn Group through internal review by the legal, finance and risk functions, the Risk Forum's monthly compliance reporting process, and the Audit and Risk Committee's quarterly oversight of modern slavery and ESG matters. The preparation of this statement was also informed by the annual OMERS compliance questionnaire, which covers modern slavery, anti-bribery and corruption, sanctions, privacy and cybersecurity across the Waveconn Group. All entities within the Waveconn Group operate under the same policies, governance framework and compliance controls.

7. LOOKING AHEAD


In the next reporting period, Waveconn intends to:

- deliver further modern slavery training to employees and contractors
- continue annual on-site audits of overseas suppliers
- strengthen effectiveness measures

APPROVAL AND SIGNATURE

This statement was approved by the board of Waveconn Group Holdings Management Pty Ltd, in its capacity as trustee of Waveconn Group Holdings Trust and as the principal governing body of the reporting entity, on 1 April 2026.

Signed by a director of Waveconn Group Holdings Management Pty Ltd as trustee of Waveconn Group Holdings Trust, as the responsible member pursuant to section 13(2)(d) of the Act.

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Kevork Sahagian

Director

Waveconn Group Holdings Management Pty Ltd

as trustee of Waveconn Group Holdings Trust

1 April 2026

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APPENDIX: MANDATORY CRITERIA INDEX

The table below identifies where each mandatory criterion under section 16 of the Modern Slavery Act 2018 (Cth) and the procedural requirements under section 13 are addressed in this statement.

Section	Mandatory criterion	Where addressed
s 16(1)(a)	Identify the reporting entity	Title block, Section 1
s 16(1)(b)	Describe structure, operations and supply chains	Section 2
s 16(1)(c)	Describe risks of modern slavery practices in operations and supply chains, including owned or controlled entities	Section 3
s 16(1)(d)	Describe actions taken to assess and address risks, including due diligence and remediation processes	Section 4
s 16(1)(e)	Describe how the entity assesses effectiveness of actions	Section 5
s 16(1)(f)	Describe consultation with owned or controlled entities	Section 6
s 16(1)(g)	Any other relevant information	Section 7
s 13(2)(c)	Approval by principal governing body	Approval and signature
s 13(2)(d)	Signature of responsible member	Approval and signature