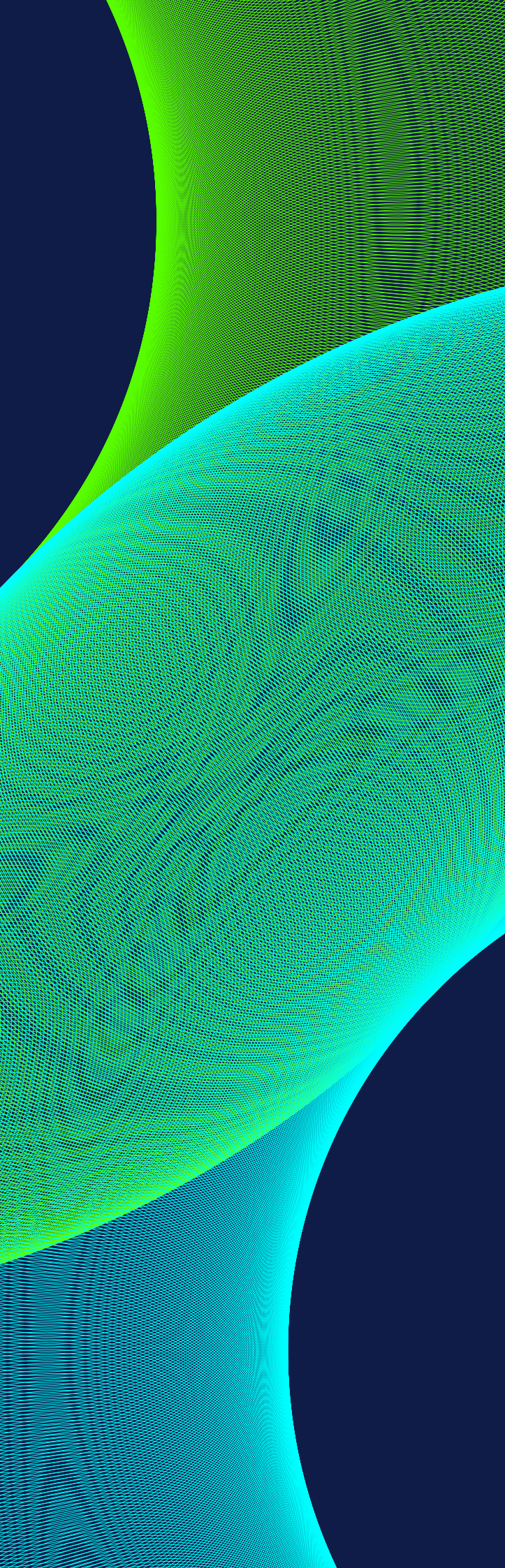




**Modern Slavery
Act Statement
2021**

VOCUS



Vocus Modern Slavery Act Statement 2021

Vocus Group Limited is a reporting entity as defined by the Modern Slavery Act 2018 (Cth).

This is our second Modern Slavery Act Statement and has been prepared in respect of the financial year 1 July 2020 to 30 June 2021 (FY21).

No instances of modern slavery were reported or identified across our operations or supply chain throughout the reporting period.

This statement, along with our most recent sustainability reports can be found at:
<https://www.vocus.com.au/about-vocus/sustainability>



Our structure, operations and supply chain

This statement covers Vocus Group Ltd (the ultimate parent company in the Vocus Group), and each of its subsidiaries within the Vocus Group. All Australian staff are represented by the parent entity and report to its executive management team. Vocus New Zealand operates as a subsidiary of the Vocus Group, with its own executive management team, workforce and governance approach. Consultation was undertaken with numerous staff across the various departments of Vocus Group and Vocus New Zealand via email, phone and videoconference to assist in the development of this statement.

We are proud to have built a world class telecommunications infrastructure platform across Australia, New Zealand and Asia to support the rapid growth in demand for increasingly resilient, secure and reliable network connectivity. Our specialist fibre network connects Australian capital mainland cities with Asia and Auckland, stretching across the Tasman and connecting north and south islands of New Zealand, and to the United States, Singapore, Indonesia and Hong Kong.

We are Australia's fourth largest telecommunications provider. Through our retail brand "Dodo", we also supply electricity and gas to residential and small to medium business. The electricity we supply customers is sourced from the grid via the Australian Electricity Market Operator, and our gas for supply to customers is purchased from upstream suppliers; we do not own any generation or distribution assets.

In March 2021, Vocus agreed to be acquired by a consortium of Macquarie Infrastructure and Real Assets (MIRA) and Aware Super called Voyage Australia Pty Ltd. Trading in Vocus shares on the ASX was suspended from the close of trading on 25 June 2021. Vocus was removed from the official list of the ASX, with effect from close of trading on 23 July 2021.

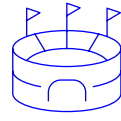
Beyond this acquisition, there have been no significant changes to our organisation or its supply chain during FY21:



We own and operate a circ. **30,000km fibre network** that is purpose-built and managed for business and government.



We have **on-net access to over 5,500 buildings** in Australia.



Our fibre optic network connects to **17 major sports stadiums**.



We own and operate **4,200km of inter capital fibre network** in New Zealand.



We operate **18 Data Centres** across Australia and New Zealand, with fibre access to another 126.



We have a team of **more than 1,850 people in Australia and New Zealand**. This includes 1,280 full-time, part-time and casual employees in Australia, and 580 full-time and part-time employees in New Zealand.



We have **more than 1,200 team members in the Philippines**, who are employees of a Philippines-based third-party business partner engaged by Vocus to support a range of functions within our Retail business, including customer support, and some aspects of Vocus Network Services.



We engage **more than 3,700 suppliers globally**, the top 25 of which account for approximately 80 per cent of our procurement spend.

Vocus is headquartered in Melbourne, Australia. We operate across all states and territories of Australia, and across the North and South Islands of New Zealand.

Vocus owns a portfolio of well-recognised brands catering to enterprise, government, wholesale, small business and residential customers across Australia and New Zealand. Our primary go-to-market brands are shown in the following table.

	Retail			Vocus Network Services	
Australia					
New Zealand					

Our policies and governance framework

Vocus has established a comprehensive framework of Corporate Governance policies that apply to all directors, executives and team members of the Vocus Group. The policies that are of particular relevance to modern slavery are our Code of Conduct, Procurement Policy, Grievance Policy and Whistleblower Policy, which have been established to maintain integrity and confidence in Vocus and appropriately safeguard the reasonable expectations of Vocus' key stakeholders.

All Vocus employees are responsible for knowing and following our policies and governance frameworks, and living our core organisational values.

Vocus does not tolerate any form of modern slavery practices in its operations or supply chain. This year we worked together with our industry peers through the Telco Together foundation to develop an Industry Statement on human rights and modern slavery.

The initiative is an important step forward in our efforts to work collectively to eliminate these practices across our value chain, share best practices and explore ways to support victims. By signing this statement we have committed to upholding the following principles, which draw on standards for business conduct set out in the UN Guiding Principles on Business and 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.
- 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.
- 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.
- 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.
- 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.

Ensuring the effectiveness of our governance framework

To ensure that our governance framework is implemented effectively, the Vocus Board of Directors receives reporting on the status and effectiveness of many of our key Corporate Governance policies, including our Whistleblower Policy.

To ensure our people are aware of their rights and responsibilities under this framework, we conduct mandatory compliance training. This training is rolled out to all new Australia-based employees, as well as contractors directly employed by Vocus. These groups also undertake refresher training every two years. In FY21, this training included a mandatory Discrimination and equal opportunity module.

To help embed the principles set out in the Industry Statement on human rights and modern slavery, and increase awareness of the issue, we also issued company-wide communications this year explaining our position and commitment to identifying and eliminating instances of modern slavery across our value chain.

Due diligence and risk management

The nature and extent of modern slavery means there is a risk that it is present in the telecommunications industry's operations and supply chains; for example, in the working conditions of some contracted labour or the manufacturing and distribution processes of some products. To mitigate this, we have implemented a range of procedures and programs to ensure the high labour management standards we expect are being met. All Vocus suppliers are required to agree to specific contractual arrangements with regards to compliance with the Modern Slavery Act 2018 (Cth) as part of our standard agreements, and our onboarding process for new suppliers.

We undertake due diligence in respect of modern slavery risks in our supply chain as a joint effort between our Australian procurement, risk and legal teams. Having mapped the Vocus Group's operations and supply chain, and undertaken an initial supply chain risk assessment in FY20, this year we:

- Continued to educate relevant team members on their modern slavery obligations, including the importance of and our plan to achieve compliance;
- Revisited the results of our supply chain risk assessment, through which we identified the areas of greatest perceived risk of modern slavery breaches in our supply chain, and updated our findings. Factors considered during this process were the size of our spend with each entity, whether they were providing goods or services, whether goods or services provided were manufactured or supplied in Australia or overseas, and known reputational risks or adverse publicity in respect of particular suppliers;
- Included our expectations with regard to modern slavery within the standard terms of our Master Services Agreement for all major suppliers, and the Vocus tender terms for smaller suppliers. To test the effectiveness of these governance mechanisms, we included questions relating to these clauses in our supplier onboarding questionnaire, which is issued to all new suppliers; and
- Continued our program of selecting a sample of comparatively higher risk-rated suppliers for further investigation.

Ensuring the effectiveness of our risk management approach

To help ensure the effectiveness of our risk management approach, we hold quarterly meetings with our Tier 1 suppliers, who account for approximately 80 per cent of our overall spend. We use these meetings to ensure our suppliers' compliance with our expectations regarding modern slavery, and to discuss their risk management approach.

We also select a sample of our comparatively higher risk-rated suppliers to complete a modern slavery self-assessment questionnaire each year. This year results were reviewed by our Procurement team and follow up questions were asked in instances where responses were unclear, or insufficient.

Following the due diligence process described above, we did not identify any instances of modern slavery in our operations or supply chain in FY21.

To help us to extend the number of suppliers we include in our assessment program in future years, we worked together with the Telco Together Foundation and our industry peers this year to identify and agree upon a supplier screening platform for implementation in FY22. The platform selected will support the identification of modern slavery risks, foster efforts between suppliers and organisations to address those risks, improve transparency, and identify areas for further due diligence.

Franchise Network

Vocus operates a small number of shopping centre kiosks used to promote the Dodo brand. During the reporting period, kiosks were either operated by Vocus employees, or by franchisees.

Franchised kiosks were identified through our risk assessment as an area of potential modern slavery risk. As franchisees are responsible for processing payroll and rostering staff, throughout the reporting period we did not have the same degree of oversight of employee conditions as compared to staff employed directly by Vocus. We managed this risk by requiring franchisees to use a third-party payroll program, which was subject to review by Vocus staff, to ensure that pay rates and rostering were compliant with the relevant awards, and consistent with our knowledge of kiosk staffing patterns and timesheets.

Within the reporting period a decision was made to permanently close our franchised kiosks. As of 1 July 2021, there are no longer any franchised kiosks in operation, meaning this risk will not be carried forward into FY22.

Contract workforce

A range of functions supporting our Retail business, and some aspects of Vocus Network Services, are provided by a workforce in the Philippines that is employed by a third-party business process outsourcing partner (third-party partner). These functions include inbound and outbound sales teams, customer service, technical support, provisioning and credit control.

We maintain a close working relationship with our third-party partner in the Philippines. As the employer of our team there, they are responsible for developing and ensuring compliance with all relevant HR policies, in accordance with local laws. Our third-party partner is committed to action on modern slavery. They have a Modern Slavery and Responsible Procurement Policy and due diligence process in place to help manage potential risks across their operations and supply chain.

Our Philippines workforce undertakes annual compliance training to ensure they are aware of their rights and responsibilities in the workplace, and specific modern slavery training is undertaken as part of the new-starter induction process. To support the wellbeing of our team in the Philippines and to help implement our company culture, values, strategy and sales practices across our contract workforce, we employ a Vocus Group Country Manager, who is based in Manila.



Grievance mechanisms

At Vocus, we ensure our people have access to a range of channels, both formal and informal, for raising issues that concern them. We are committed to thoroughly, objectively and fairly investigating all matters reported in a timely manner.

Controls are in place to ensure the effectiveness of our grievance mechanisms. The Vocus Board undertakes regular reviews of the Whistleblower Policy to ensure it remains appropriate and is operating effectively. Vocus' Chief People Officer undertakes regular reviews of our Grievance Policy and procedure, and oversees the Your Say channel. Regular communications are also issued reminding employees of the availability of these feedback and grievance mechanisms.

Whistleblower Policy

Our Whistleblower Policy is accessible via the Vocus website and intranet, and sets out the various channels through which Eligible Whistleblowers can make a disclosure. Vocus employees, contractors, suppliers, and their families are all defined as Eligible Whistleblowers, as are the employees of Vocus third-party contractors or suppliers. Accordingly, genuine concerns about unethical conduct within the Vocus supply chain may be reported under the Whistleblower Policy, if other avenues are not successful.

Our Whistleblower Policy affords Eligible Whistleblowers anonymity, confidentiality and protection from detriment, in instances where they are reporting potential wrongdoing or inappropriate conduct. Once a disclosure is received by the appropriate Disclosure Officer, Vocus will investigate whether the disclosure qualifies for protection under the Policy, and whether a formal, in-depth investigation is required. The disclosure may be referred to the Vocus Ethics Committee for consideration and investigation and, if required, an external independent investigator may be engaged.

Along with making our Whistleblower Policy available to all new Vocus suppliers as part of our onboarding process, we have processes in place to check whether our suppliers and sub-contractors operate their own whistleblowing processes; how their processes are actively promoted within their organisations; and how any breaches or suspected breaches are reported.

Vocus' Whistleblower Policy is publicly available at the following link: <https://www.vocus.com.au/legal/corporate-governance>.

Grievance Policy

Our Grievance Policy provides our people, as well as Vocus customers and visitors to our sites, with a formal mechanism to help address and resolve grievances in a way that is fair, reasonable and timely. The Policy is available via our intranet and sets out a procedure by which concerns can be raised, investigated and resolved.

Your Say

Your Say is an informal mechanism through which team members are encouraged to ask questions, make suggestions and raise concerns directly with Vocus' People and Culture team. All queries are addressed by a member of the People and Culture leadership team.

Vocus' General Counsel & Company Secretary and/or Chief People Officer may also occasionally receive ad hoc complaints or grievances directly. When this occurs, they thoroughly investigate any allegations objectively and fairly, and report back to interested parties in a timely manner on the outcome of the investigation.

During FY21 no Whistleblower reports or grievances were raised via any of these channels in respect of modern slavery issues.

Looking Forward

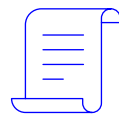
Over the next year, our focus will be on:



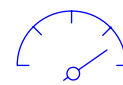
Implementing a supplier screening tool, in partnership with our industry peers, and using this tool to extend the number of suppliers we screen on a regular basis.



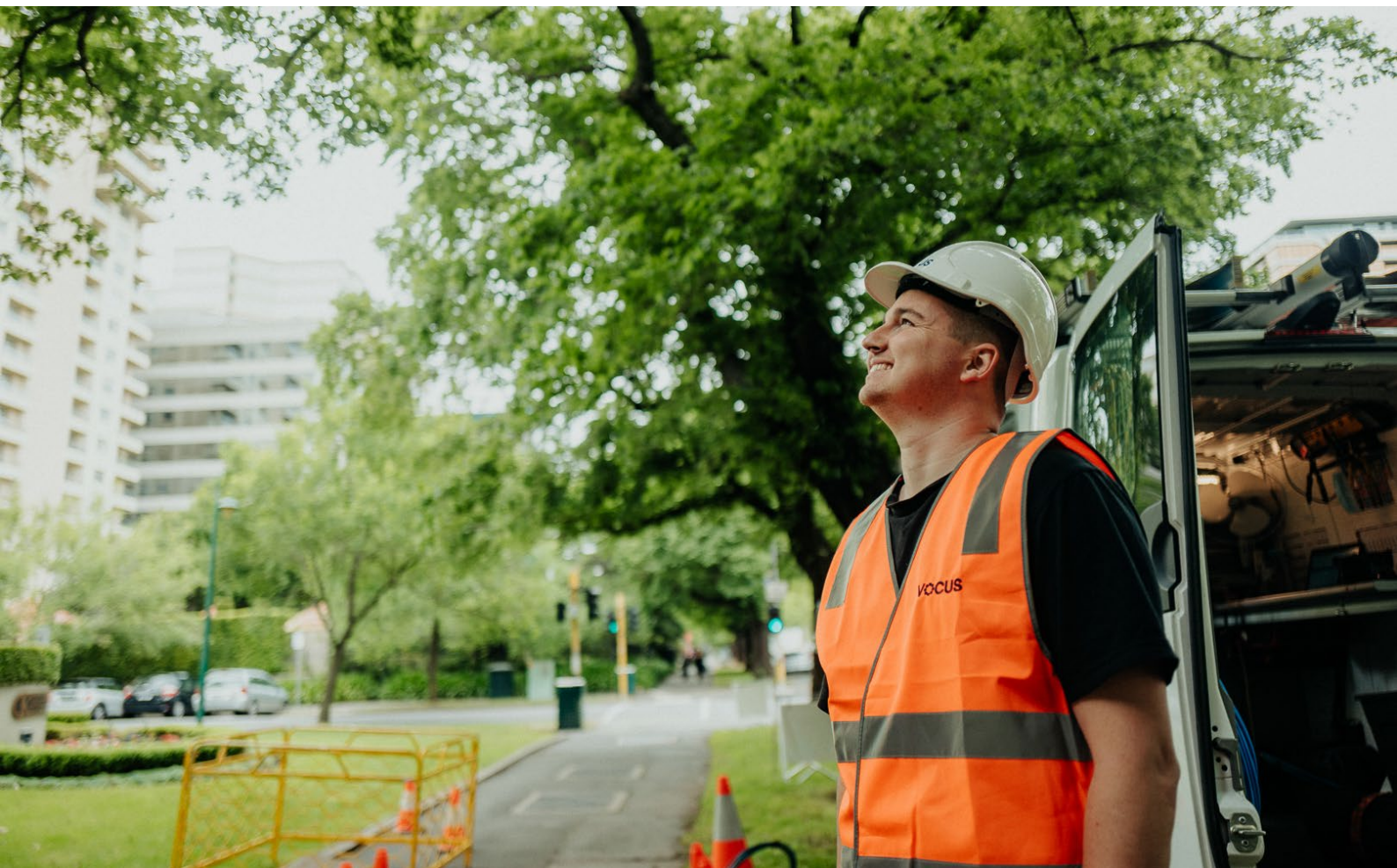
Adopting software that will enable us to audit, and follow up on supplier screening questionnaires more effectively.



Updating our Procurement Policy to clarify our expectations of our people with regard to identifying and mitigating modern slavery risks, and communicating these expectations.



Developing performance indicators to assist us in assessing the effectiveness of our management of modern slavery risks.

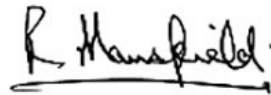


Approval

This Modern Slavery Statement was approved by the Board of Directors on 1 November 2021 and is signed on its behalf by the Managing Director and Chief Executive Officer, and Board Chairman.



Mr. Kevin Russell,
Managing Director and Chief Executive Officer



Mr. Bob Mansfield AO,
Chairman

