



MODERN SLAVERY STATEMENT

Introduction

Axicom is a leading owner and operator of wireless infrastructure in Australia. In addition to our core business of acquiring, designing, building and managing towers and rooftops, we provide expert engineering, (site acquisition, environment and design (SAED), and property management services to help our customers accelerate deployment and easily expand their networks. We have sites throughout Australia, including all major metropolitan cities, regional and rural areas and remote locations.

We are committed to doing our part as a business to combat modern slavery, which is a serious global issue. Axicom recognises the need for our organisation to assess and address the modern slavery risks in our operations and supply chains. Axicom supports the Commonwealth Government's introduction of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) as an important milestone towards combatting modern slavery.

The reporting entities in the Axicom corporate group are submitting their first joint modern slavery statement for the reporting period of 1 January 2020 to 31 December 2020. We have structured our Joint Statement to clearly address all seven mandatory criteria for a modern slavery statement under section 16 of the Modern Slavery Act.

The work we have done in our first reporting year has been valuable. No instances of modern slavery were identified during the reporting period, or ever in Axicom's history. The modern slavery risk exhibited by Axicom's operations and supply chain is considered to be low as determined by a risk assessment completed during the reporting year. We have nevertheless identified the following 2 key priorities to focus on moving forward as these are areas where Axicom has the greatest leverage to help mitigate the risk of modern slavery:

- Our key contractors who are involved in procuring building materials (e.g. steel and concrete) used in our operations. While we do not directly procure these materials, we recognise that the supply chains associated with their manufacturing and transport exhibit comparatively greater modern slavery risk; and
- Our construction services for our towers.

We also look forward to increasing our modern slavery awareness through further training and education as we develop our modern slavery compliance roadmap in future years.

We look forward to reporting on our progress as we implement these measures.

Approval and signing

This joint modern slavery statement was approved by the board of Axicom HoldCo Pty Ltd on 3 June 2021. The board of Axicom HoldCo Pty Ltd approved this joint modern slavery statement on behalf of each of the Axicom Reporting Entities (set out in **Appendix 1**) as the higher entity that owns or controls the other Axicom Reporting Entities.

Signature:

A handwritten signature in black ink, appearing to read "J Roberts".

John Roberts - Director, Axicom HoldCo Pty Ltd
3 June 2021



MODERN SLAVERY STATEMENT

1. Who we are

This joint modern slavery statement (**Joint Statement**) covers the reporting entities set out in **Appendix 1**. In this Joint Statement, the reporting entities are referred to as **Axicom, Axicom Reporting Entities, we** or **us** while the broader Axicom corporate group in Australia is referred to as the **Axicom Group**.

This Joint Statement is submitted by the Axicom Reporting Entities for the reporting period of 1 January 2020 to 31 December 2020.

2. Our structure, operations and supply chains

How we are structured

All Axicom Reporting Entities are private companies incorporated in Australia. Axicom HoldCo Pty Ltd (ACN 605 798 829) (an Axicom Reporting Entity) is the ultimate parent company of the Axicom Group. Our registered office is Sydney, NSW. There were 185 workers (comprised of permanent and fixed term employees) in the Axicom Group across the reporting period.

For the purpose of the Modern Slavery Act, each of the Axicom Reporting Entities owns or controls one or more entities in the Axicom Group operating in Australia.

What we do

We provide tower and rooftop sites across Australia for the purpose of the deployment of wireless communication equipment across Australia. We own, operate and manage a portfolio of approximately 2000 sites. We maintain those sites to adhere to required standards and regularly undertake portfolio health checks.

We offer the following additional services:

- **Deployment and Site Acquisition, Environment and Design (SAED):** We provide the full suite of site development services from site identification through to construction, installation and commissioning. This includes new site development services, project management, customer site acquisition and site access, town planning and regulatory compliance, design (structural, civil and electrical) and construction services and site compliance services.
- **Structural engineering:** We offer structural engineering services for the Australian telecommunications industry. This aspect of our business specialises in the assessment and design of infrastructure to support the deployment of wireless network equipment. We deliver structural assessments and design antenna mounts and headframes to facilitate customer antenna configuration to attach to a tower or a building and deliver tower upgrade options to increase tower capacity.

- **Site management and operations:** From our 24/7 Site Management Centre, we provide reporting, analysis, emergency response services, access control, work health and safety compliance and a first contact point for customers on our sites. We provide maintenance services for sites all Axicom sites.
- **Site ownership and management:** Ownership and management of sites on which towers and rooftop installations owned by our customers are located.

Our customers include major wireless carriers, emergency services, enterprise and government agencies and wireless broadband data service providers.

The brand name associated with the Axicom Reporting Entities is **Axicom**.

Our supply chains

We have mapped out our supply chains at a high level as set out in the following table.

Products or services acquired
For our deployment and SAED services
We do not directly procure materials for our deployment and SAED services. For the construction and upgrade of our structures, we engage contractors who are predominantly based in Australia. In turn, our key contractors subcontract the work and procure building materials (in particular, steel frames and concrete) for the provision of services to us. As a result, there is indirect procurement of materials and services for this aspect of our business.
For the purpose of Axicom’s construction services, we procure towers, equipment, mounts and headframes. The actual build of the structures (such as the towers) is contracted out to different contractors who then will often subcontract the work to other entities. Unlike other construction services, the construction services we procure for our towers and rooftops require a highly skilled workforce.
For our engineering services
Our engineering team sits within the site operations team and procures office services and facilities and occasionally external engineering services.
For our site operations services
Our site operations team is responsible for the maintenance of our towers and rooftops. The team directly engages contractors to check the status of the towers and rooftops. The contractors we engage in these services are highly skilled and trained.
For our site management services
We secure long term site licences for wireless equipment on the tower sites. We have master leasing agreements with all major telecommunications carriers in Australia.

We also partner with building owners to obtain leases of their rooftop locations.
For our infrastructure
<p>Axicom has procured the following services for its infrastructure from suppliers located in Australia and the UK:</p> <ul style="list-style-type: none"> • Maintenance services; • Equipment audit services (post installation); • Portfolio health evaluation services; • Minor site improvement services; • Structure strengthening services; and • Software and services for our 24/7 Site Management Centre.
Office services and facilities
<p>For our group office services and facilities, we procure office supplies, IT equipment, cleaning services and professional services (e.g. legal services and accounting services) from Australian based suppliers. We have worked with the majority of our key professional services providers for a long time. We have made a conscious decision to keep our IT services (in particular, data storage) onshore.</p>

3. Modern slavery risks in our operations and supply chains and the operations and supply chains of any entities we own or control

Through our modern slavery risk assessment process, it was determined overall that Axicom’s direct operations and supply chain exhibit low modern slavery risk, primarily due to the country risk associated with our domestic operations. It is recognised, however, that some parts of Axicom’s supply chain exhibit comparatively higher modern slavery risk due to higher sector risk (e.g. construction work, construction material, manufacturing and transport, IT procurement, IT services, cleaning services). While we are not aware of any specific modern slavery incidents occurring during this reporting period, we have identified the following high-level modern slavery risks in our operations and supply chains:

Priority	Rationale
Key priorities	
Our key contractors who are involved in procuring building materials (e.g. steel and concrete) used in our operations	We do not directly procure materials for the construction of towers and rooftops. For the build of our structures, we engage contractors who are predominantly based in Australia. In

Priority	Rationale
Steel and concrete inputs with higher risks	turn, those key contractors subcontract the work and procure building materials (in particular, steel frames and concrete) for the provision of services to us. The materials may be sourced from countries carrying a higher risk of modern slavery. Additionally, the Commonwealth Guidance recognises that steel and concrete components may carry higher risks of modern slavery due to how and where they are produced. While we do not directly procure these building materials, we recognise their procurement exhibits comparatively higher modern slavery risk.
Our construction services	We procure specialist construction services for the actual build of our structures (such as our towers). While the construction industry is recognised as presenting higher modern slavery risks because it usually involves low skilled, manual and temporary labour, the construction services we procure for our towers are different. The construction services for our mobile towers require a highly skilled workforce. However, we recognise that construction is known to be a higher risk industry based on modern slavery risk indicators.
Other priorities	
Cleaning services	Certain services may have higher modern slavery risks because of the way they are provided. Cleaning often involves lower wages and manual labour, so it is recognised as a higher risk service. The cleaning services for our office buildings are procured by our building management provider.
IT equipment	We are aware that some of the IT equipment we procure for our staff to use in our offices and at home may be from countries known to carry medium to high risks of modern slavery based on the Global Slavery Index, including China and India. However, we do not have significant leverage over suppliers who provide us with IT equipment.

Our future priorities

Given the direct relationships with our suppliers for our construction requirements, we will focus on identifying and addressing the modern slavery risks in relation to:

- the key contractors who are involved in procuring building materials (e.g. steel and concrete) used in our operations; and
- the construction services for our towers,

during the next one to three reporting periods. As we have little leverage in relation to the suppliers for our IT equipment and simply use the cleaning services chosen by the building managers for our office buildings, we are not intending to focus on these risk areas in the near term unless circumstances change, or we become aware of facts that indicate a heightened risk of modern slavery.

4. Our actions to assess and address modern slavery risks, including due diligence and remediation processes

Creating our first Joint Statement has given us the chance to review the processes and procedures we already have in place. This has helped us to formulate a compliance roadmap for future reporting periods.

Current processes and procedures

We have procurement processes, which currently focus on work health and safety questions. We also have a preferred contractors list. There is an opportunity to further develop our existing procurement processes by adding questions to identify modern slavery risks.

We have a Whistleblower Policy for staff and third parties to report concerns (which could be modern slavery risks or incidents). Under this policy, we have a hotline, drop-box, email address, fax and postal address, which are managed by an external professional services provider. We recognise the importance of staff members knowing how to respond appropriately to prevent or mitigate harm if a modern slavery incident or risk is found. This policy could help us to identify and address concerns about adverse human rights impacts.

Members of our in-house legal team have completed modern slavery laws training during the reporting period. This was a good opportunity for our legal team to increase their knowledge of the Modern Slavery Act and how Axicom can build on its current processes and procedures to identify and address modern slavery risks in its operations and supply chains.

Future actions

Axicom is committed to taking actions to assess and address modern slavery risks. We have outlined our goals for the next few reporting periods in section 7 (Any other relevant information).

5. Measuring the effectiveness of our actions

At Axicom, we recognise the need to have a means to measure the effectiveness of our actions to combat modern slavery. We have set out some ways of measuring the effectiveness of our actions in this section. We anticipate that as our response to modern slavery becomes more advanced, we will fine tune our key performance indicators.

Relevant action	Measure of effectiveness
Current steps	
Procurement process	<p>Knowing what processes we have in place when engaging suppliers.</p> <p>Determining the percentage of active contracts that incorporate modern slavery risk mitigants such as counterparty obligations regarding controls, monitoring and reporting to Axicom.</p>
Modern slavery training	<p>Having more awareness within our in-house legal team of modern slavery and the requirements of the Modern Slavery Act.</p>
Board	<p>Having more engagement with the board in relation to Axicom’s measures to identify and address modern slavery risks, including a periodic review by an internal committee of the adequacy of the risk management system.</p>
Future steps	
Preparing and implementing an anti-modern slavery policy	<p>Having a standalone document outlining our commitment to combatting modern slavery.</p>
Engaging with suppliers and adding modern slavery specific questions to our procurement processes	<p>Having more awareness of modern slavery risks in our supply chains and a more specialised process to identify modern slavery risks amongst suppliers.</p> <p>Implement a mechanism to monitor, investigate, record and track any incidents that occur.</p> <p>Require suppliers to report to Axicom any modern slavery incidents.</p>
Education of employees	<p>Rolling out training to all employees on how to understand, identify and report modern slavery in our business and supply chains.</p>

Relevant action	Measure of effectiveness
	Tracking percentage of Axicom staff that have received modern slavery training (e.g. how to use the Whistleblower Policy).
Regularly assessing and reviewing our modern slavery risk management system	<p>Implement a mechanism to receive, review and address feedback received from employees, suppliers and other supply chain partners regarding the perceived effectiveness of our modern slavery risk controls.</p> <p>Periodic internal and/or external audits of the adequacy of our modern slavery risk management system.</p>

6. Consultation

The Axicom Reporting Entities have taken a whole-of-enterprise approach to preparing this Joint Statement. Key stakeholders from the procurement, legal and finance teams of each Reporting Entity were involved in the preparation of this Joint Statement. We provided opportunities for our owned and controlled entities to provide input on the Joint Statement by circulating drafts to key stakeholders.

We intend to develop our consultation process further once we have formalised how we report each year.

7. Any other relevant information

Impact of COVID-19

The impact of COVID-19 on the Axicom Group affected the availability of resources and time for us to identify and address modern slavery risks in our operations and supply chains. Having to deal with the immediate consequences of COVID-19 on our business in 2020 diverted staff time and resources from our modern slavery laws compliance program. Some of the measures which we had originally hoped to undertake in this reporting period have been postponed. For example, we did not have the chance to develop and implement an anti-modern slavery policy during this reporting period, but this step is planned for 2021.

Telecommunications industry response to COVID-19

During 2020, telecommunications networks in Australia experienced increased demand due to the number of people in lock-down or studying and working online. The telecommunications industry worked with the government and each other to ensure the delivery of services to Australians. Axicom considers that the capacity for the industry to work together could be utilised in the context of modern slavery. As part of our efforts to

upskill in this area, we will be looking at what other members of the telecommunications industry have done to address this important issue.

Telco Together

Axicom is a member of Telco Together Foundation. Telco Together Foundation is a platform allowing the telecommunications industry to make a social contribution to support disadvantaged communities in Australia. This is a potential forum for us to collaborate with other members of the industry to address modern slavery.

Real Estate Global Risk Benchmarking

We participate in Real Estate Global Risk Benchmarking and have been asked about our actions in the modern slavery laws compliance space.

Compliance roadmap – where to next?

For the next one to three reporting periods, we are aiming to achieve the following:

- **Commencing the process of identifying and addressing the modern slavery risks in our key contractors who are involved in the procurement of building materials and our construction services for our towers;**
- **Adding modern slavery specific questions to our procurement processes:** As our current procurement processes focus on work, health and safety issues, we intend to add questions to identify modern slavery risks in the operations and supply chains of our potential suppliers and what policies and procedures our potential suppliers have in place to mitigate these risks. We have prepared a modern slavery specific external supplier survey and a guide to interpreting survey results, which could be rolled out to our potential and existing suppliers based on their risk profile. This action relates to our human rights due diligence, which we understand from the Commonwealth Guidance to include **identifying and assessing actual and human rights impacts**.
- **Integrating our findings across Axicom and taking appropriate action to address impacts as part of our human rights due diligence:**
 - **Preparing and implementing an anti-modern slavery policy:** We are in the process of preparing an internal policy for our staff. The policy will introduce the Modern Slavery Act, describe what modern slavery is and what procedures to follow if staff members find a modern slavery risk or incident.
 - **Rolling out modern slavery training:** We wish to train our staff so that they know what modern slavery is, have an overview of the requirements of the Modern Slavery Act, are aware of modern slavery risks and know how to respond if there is a modern slavery risk or incident reported. Key members of our procurement staff will be prioritised for the training rollout.
 - **Considering how modern slavery risk management could be incorporated into our existing risk management framework:** We have an enterprise-

wide risk management framework. We will consider whether modern slavery as a risk can be incorporated into this framework.

We look forward to reporting on our progress for 2021 in our next statement.



MODERN SLAVERY STATEMENT

Appendix 1 - Axicom Reporting Entities

This Joint Statement covers the entities in this table.

No.	Name of Axicom reporting entity	ACN
1	Axicom HoldCo Pty Ltd	ACN 605 798 829
2	Axicom Holdings Pty Ltd	ACN 086 370 274
3	Axicom Pty Ltd	ACN 090 873 019
4	Axicom BidCo Pty Ltd	ACN 605 799 899