



Modern Slavery Statement

NCSI (Australia) Pty Limited

Effective date: 31/09/2025

make
change
happen



Modern Slavery Statement

Apr24 - Mar25

NCSI (Australia) Pty Limited

Contents

1. Introduction and Purpose	3
2. Reporting Entity.....	3
3. Structure, Operations and Supply chain.....	4
3.1 Operations	4
3.2 Supply Chain.....	4
4. Risks of Modern Slavery Practices	5
4.1 Geographical Risks	6
4.2 Industrial Risks	6
4.3 Indirect Suppliers – raw materials	6
5. Actions Taken To Assess and Address Modern Slavery Risks	6
5.1 Key Focus Objectives.....	6
5.2 Due Diligence and Risk Management	7
5.2.1 Supplier Agreements	7
5.2.2 Audits	7
5.2.3 Training	7
5.2.4 Internal policies.....	8
5.3 Further considerations.....	9
6. Assessing Effectiveness.....	10
6.1 Modern Slavery Awareness	10
6.2 Supplier Agreements	10
6.3 Reporting.....	10
6.4 Independent Audit	10
7. Statement Approval.....	10



1. Introduction and Purpose

Modern slavery is the severe exploitation of a person for personal or commercial gain by another party. It refers to practices including forced labour, child labour, debt bondage, slavery and slavery-like practices, and extends to instances involving force, coercion, deception or abuse of power. In practice, modern slavery can occur where a person is forced to work without pay to settle debts or is forced to work through intimidation and violence. The term ‘modern slavery’ can also include other unlawful activities that have adverse effects on human rights, such as corruption and environmental damage.

NCSI (Australia) Pty Limited (hereinafter “**NCSI AU**”) recognises that modern forms of slavery can occur in any industry across the world, with significant consequences for victims and negative impacts on global business and markets.

NCSI AU actively works to identify and mitigate risks associated with modern slavery, and are committed to delivering our services in a manner that upholds human rights and protects the fundamental dignity of workers.

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) and reflects our ongoing efforts to promote transparency, accountability, and continuous improvement in how we identify, prevent, and respond to modern slavery risks.

2. Reporting Entity

This Statement describes the initiatives undertaken by NCSI AU and its controlled entities to assess and address the risks of modern slavery in our business operations and supply chain.

Reporting entity name	NCSI (Australia) Pty Limited
ABN	38 089 983 317
Registered office	Level 4, 10 Shelley Street Sydney NSW 2000
Industry	Information technology and telecommunication
Controlled entities of the reporting entity	<ul style="list-style-type: none">- Dialog Pty Ltd (ABN 16 010 089 175) and its related bodies corporate as defined in the <i>Corporations Act 2001</i> (Cth);- Riley Solutions Pty Ltd (ABN 79 144 694 977);- Eighty20 Solutions Pty Ltd (ABN 23 618 019 355);- NCS AU Pty Ltd (ABN 78 626 006 111) (NCS AU) and its related bodies corporate as defined in the <i>Corporations Act 2001</i> (Cth).
Reporting period	1 April 2024 – 31 March 2025



3. Structure, Operations and Supply chain

Our purpose at NCSI AU is to make tomorrow together. We advance our communities by working with governments and enterprises to harness technology. We do this by bringing people together to make extraordinary happen. Through our commitment to quality, our focus on people and by challenging traditional thinking, we believe that technology services can be done better. Our people bring this to life by advising, transforming and managing technology to help our clients and communities.

NCSI AU is a wholly owned subsidiary of NCS Pte Ltd (NCS), who in turn is a wholly owned subsidiary of Singapore Telecommunications Limited. NCSI AU is the Australian holding company the NCS controlled entities, with NCS AU being our operating and contracting entity that engages directly with our customers and suppliers.

,

3.1 Operations

NCSI AU's workforce is approximately 1,500 employees, with offices across Sydney, Melbourne, Canberra, Brisbane, Adelaide, Perth and Darwin. The company's focus is on meeting the increasing demand for AI and digital transformation, leveraging partnerships with cloud providers like Google and Microsoft to provide end-to-end solutions.

3.2 Supply Chain

NCSI AU directly engaged multiple suppliers during the reporting period, primarily for provision of software, hardware, network support for our data and call centres and digital platforms. We also procured indirect suppliers and service providers in limited capacities to provide hardware and software, professional services, security, catering, cleaning, office maintenance and other business-related services.

Our suppliers are primarily based in Australia, United States of America, Singapore, Philippines, India, Vietnam and Nigeria.



4. Risks of Modern Slavery Practices

NCSI AU is committed to fostering a transparent, robust supply chain that is free from any modern slavery. As part of Singtel Group, we are subject to their [Human Rights Statement](#), in particular **their position on Labour Rights and Prohibition of Modern Slavery**.

NCSI AU acknowledges the potential presence of modern slavery risks within its operations and supply chain. We recognise we may be susceptible to the presence of modern slavery risks through:

- **Hired workforce:** While the risk is minimal, as NCSI AU's employees are primarily based in Australia, we remain committed to compliance with local labour laws and have implemented robust systems to monitor and ensure compliance with these requirements for our directly employed personnel.
- **Direct suppliers:** We understand that risks of modern slavery can exist within NCSI AU's network of direct suppliers who provide products and services. To assess these risks, we consider social and political conditions in countries where our suppliers operate, as well as industry and procurement categories that may carry inherent risks.
- **Indirect suppliers and supply chains:** NCSI AU is aware that modern slavery risks can extend to indirect suppliers and their associated supply chains, and we recognise the potential for such risks. We are committed to identifying and mitigating these challenges, so our supply chain remains transparent and free from modern slavery practices.

4.1 Geographical Risks

Through our direct engagement with international suppliers based in United States of America, Singapore, Philippines, India, Vietnam and Nigeria, we identified geographical risks that may contribute to modern slavery. To provide context, it is important to note that the [Global Slavery Index](#) identified 10 countries with the largest estimated absolute numbers of people in modern slavery. India, Nigeria and the Philippines are among the countries listed as of high-risk.

4.2 Industrial Risks

In consideration of the industries in which NCSI AU operates, technology-based companies generally experience significant challenges in slavery risk management relating to debt-bonded labour and forced labour. Given our utilisation of technical network support for our data and call centre support as part of our operations, we recognise there are potential areas that may present modern slavery risk where they involve lower-skilled workers such as migrant workers who may be vulnerable to modern slavery.

4.3 Indirect Suppliers – raw materials

NCSI AU does not manufacture products from raw materials as part of its operations, though our hardware providers may utilise suppliers of this nature. For example, a high-risk area for the technology industry is the sourcing of tin, tantalum, tungsten, and gold commonly used in electronic devices.

5. Actions Taken To Assess and Address Modern Slavery Risks

5.1 Key Focus Objectives

- 1) All our people are required to annually complete our 'Modern Slavery Awareness' training module, which is part of our mandatory Compliance Curriculum. The module provides context and detail to explain the risks of modern slavery and provides options to report any suspected instances.
- 2) We have implemented a centralised process to conduct due diligence background checks on all new vendors. The screening checks for any reported adverse news, which would include publicly available reports on **modern slavery convictions or human rights violations**. This screening check is **mandatory** for all new vendors we engage.

5.2 Due Diligence and Risk Management

5.2.1 Supplier Agreements

As part of the Singtel Group, NCSI AU follow its Trade Compliance Policy which includes undertaking a range of due diligence checks, which is essential for identifying and managing trade compliance risks and ensure our products and services are used in compliance with the applicable Trade Laws.

Our supplier due diligence process is mandatory and focuses on three main areas:

- Third Party Verification: We verify Third Party identities to confirm they are not on any sanctions lists or owned or associated with sanctioned individuals or entities;
- End User and End Use Assessment (for clients): We identify the End User and the intended end use of our products or services to prevent any unauthorized applications;
- Product/ Services Compliance: We determine if our products or services are Controlled Items to ensure that the appropriate licenses or approvals are in place before proceeding with the transaction.

Additionally, our standard contractual terms impose a duty on our suppliers to ensure they comply with all applicable laws and their practices do not contribute to the risks of modern slavery. Specifically, vendors are contractually obliged to comply with the Singtel [Supplier Code of Conduct](#), which includes specific provisions for Modern Slavery.

5.2.2 Audits

We did not perform any audits of suppliers during the reporting period, as we did not identify any instances of non-compliance relating to modern slavery. Audit provisions are built into contractual obligations for suppliers as per our standard contractual terms, enabling audits to be performed by NCSI AU, as well as granting us the ability to audit suppliers on breach of contract for the purposes of remediation.

5.2.3 Training

Our Modern Slavery Awareness training is part of our mandatory Compliance Curriculum and must be completed by all employees across Australia on an annual basis.

Additionally, our internal incident reporting (“whistleblower”) process, aligned with Singtel Group’s overarching Whistleblower [Policy](#), ensures a comprehensive framework for identifying and addressing concerns including those related to modern slavery.

5.2.4 Internal policies

NCSI AU have implemented the following internal policies that support our modern slavery and human rights initiatives:

Singtel Group Human Rights Statement	The Singtel Group Human Rights Statement applies to Singtel and its wholly owned subsidiaries which includes NCSI AU. It sets out the commitment to upholding and protecting the human rights of all individuals through a culture of respect, trust and inclusion in our organisation and supply chains, regardless of backgrounds, beliefs and abilities, maintaining a zero tolerance for modern slavery in all forms.
Code of Conduct	The Supplier Code of Conduct is based on NCSI AU's organisational values and represents our commitment to uphold ethical business practices and to meet our legal obligations.
Whistleblower Protection Policy	The whistleblower protection policy is designed to instil the values of accountability to customers, suppliers, peers, managers and team workers. It emphasises the integrity of our processes and procedures and encourages treating others with respect, courtesy and professionalism. The policy aims to foster a culture where any officer, employee or contractor feels empowered to speak up about potential misconduct concerns, including suspected modern slavery, without facing any form of detriment.
Supplier Due Diligence	A company-wide mandatory third-party Supplier Due Diligence process for NCSI AU's subcontractors, suppliers and vendors has been put in place by the procurement team to help NCSI AU to adopt a proactive approach to managing compliance risks associated with NCSI AU's engagement with third-party suppliers.
Supplier Contract Agreements	The standard contract conditions in our Vendor Contract policy set out mandatory obligations for our third-party suppliers, including compliance to Singtel Code of Conduct, which includes our position on Modern Slavery.
Recruitment and Labour Hire Policy	Ensures fair and transparent recruitment practices and requires that all employment arrangements—whether

	direct or through labour hire—comply with applicable employment and human rights standards.
Grievance and Incident Management Procedures	Enables timely investigation and resolution of concerns raised by employees or third parties, including any allegations related to modern slavery.

5.3 Further considerations

NCSI AU are conscious of the need for improved transparency within our supply chain and are committed to ongoing process improvements and training. To further mitigate modern slavery risks, NCSI AU has considered (and where appropriate, started implementing) the following areas for improvement:

1. Supplier Due Diligence: during the previous reporting period, we implemented a new, centralised process to conduct Due Diligence on all new suppliers. We will continue to work closely with the Due Diligence team to identify ways we can further enhance the screening process.
2. Supplier On-going Assessments and Audits: as part of a planned pro-active approach, we plan to instigate an annual due diligence check on all existing vendors. This will be co-ordinated by our wider organisation.
3. Client Due Diligence: the Singtel Group has deployed its Trade Sanctions Compliance policy, which includes a comprehensive end-to-end management of trade compliance. To comply with this policy NCSI AU is enhancing its Client Onboarding Due Diligence process.
4. ABC Portal: as part of the business commitment to improve the development of processes and communication on anti-bribery and corruption issues, NCSI AU is developing its local ABC Portal to raise awareness of and to track gifts and hospitality.

By considering these areas and developing our processes further over the next reporting period, we aim to strengthen our commitment to minimising the risk of modern slavery from our supply chain.

NCSI AU is committed to continuously improving its approach to Modern Slavery. Planned initiatives for the next reporting period include:

- **Conducting an internal audit of Procurement and Sales functions** to assess the effectiveness of controls and processes related to modern slavery risk identification, due diligence, and remediation.
- **Enhancing supplier due diligence practices**, including reviewing and strengthening onboarding processes to incorporate risk indicators for modern slavery and ethical sourcing.



- **Launching the Anti-Bribery and Corruption (ABC) portal**, which will provide streamlined access to internal reporting channels, including the whistleblower mechanism, supporting early detection and response to concerns.
- **Reviewing and uplifting the Modern Slavery Awareness training module** as part of NCSI AU's mandatory Compliance Curriculum, to ensure it remains relevant and aligned with current regulatory and operational risk areas.

6. Assessing Effectiveness

6.1 Modern Slavery Awareness

All our people are required to complete Modern Slavery Awareness training, on an annual basis as part of our mandatory Compliance Curriculum. Completion is actively tracked and managed.

6.2 Supplier Agreements

In any case of modern slavery non-compliance by a supplier, our standard contractual terms provide grounds for termination.

6.3 Reporting

If an employee or representative of NCSI AU has concerns that a supplier may be involved in modern slavery practices, we have mechanisms in place to facilitate reporting of these concerns. We have adapted Singtel Group's Whistleblower policy, which provides an additional, independent reporting channel. Concerns raised are tracked and actively investigated.

6.4 Independent Audit

We have not yet conducted an independent review of our modern slavery initiatives. However, NCSI AU acknowledges the importance of such a review and will continue to assess the necessity of engaging an auditor to undertake this process.

To strengthen our internal oversight, an internal audit covering Procurement and Sales functions is scheduled for the 2025/2026 period. This audit will include a review of processes and controls related to the identification and mitigation of Modern Slavery risks within our operations.

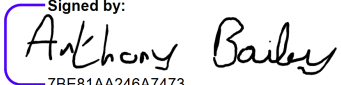
7. Statement Approval



NCSI AU has worked with various key internal stakeholders, including Legal, Procurement, People and Culture and GRC (Governance, Risk and Compliance) teams to prepare this statement.

This statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) and outlines the initiatives implemented to assess, evaluate and address the risks of modern slavery in NCSI AU's business operations and supply chain during the reporting period ending 31 March 2025.

In accordance with the Act, this modern slavery statement has been approved by the board of NCSI AU (its principal governing body) and is signed by a responsible member of NCSI AU:

Signed by:

.....7BE81AA246A7473.....

Anthony Micheal Bailey

NCSI (Australia) Pty Limited - Country Lead and Director

Date: 24 September 2025