

Aussie Broadband Modern Slavery Statement

Aussie Broadband Limited (ABN 29 132 090 192) (Aussie Broadband) is subject to the requirements of the Australian *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement (**the Statement**) relates to the financial year 1 July 2020 to 30 June 2021.

What is Modern Slavery:

Universally, definitions of Modern Slavery are varied but include exploitative practices such as human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage in serious violation of an individual's dignity and human rights.

Modern slavery occurs not only in foreign countries (which might include Australian business supply chains) but also in Australia. It is estimated by the Australian Institute of Criminology, that up to 1,900 Australians were living in conditions of modern slavery in 2015-16 and 2016-17.

Statement from the Managing Director, Phillip Britt

'We continue to collaborate with industry and our supply chain to mitigate modern slavery and its impacts in Australia and globally where we can. Aussie Broadband looks forward to seeing what we can continue to achieve together, over and above what we can achieve independently.'

FY2021 Attestation

To date, Aussie Broadband has not had any issues raised with it or reported to it regarding modern slavery, human trafficking or human rights associated directly with its operations or its supply chains. We consulted the relevant companies we own or control in the development of this statement.

This statement was approved by the Board of Aussie Broadband Limited on 20 December 2021.



Phillip Britt
Managing Director
December 2021

About Aussie Broadband

Aussie Broadband is an Australian telecommunications carrier often described as a challenger internet service provider, offering a range of services across the residential, small business and enterprise segments. Aussie Broadband has evolved from a start-up over 17 years ago, to becoming the fifth largest provider of NBN services across Australia and a publicly listed company on the Australian Stock Exchange in 2020.

With a reputation for providing high-quality internet services and transparent customer service, we are in business to change the telco game – not just for our customers but also for all telco customers in Australia.

Aussie Broadband opposes Modern Slavery in all its forms. This Statement outlines the steps we have taken and will take, to minimise the risk of Modern Slavery occurring in our business and our supply chains.

Aussie Broadband is based in Morwell, Victoria, and is one of the largest employers in the Latrobe Valley region. We have two further contact centres in Dandenong South, Victoria, and Burswood in Western Australia. Wideband Networks Pty Ltd (ABN 11 097 649 851) and Westvic Broadband Pty Ltd (ABN 82 106 835 947) are a fully-owned subsidiaries of Aussie Broadband.

Aussie Broadband's Policies and Principles

One of Aussie Broadband's fundamental values is '*be good to people*'. Being good to people includes having a positive impact on the community. Aussie Broadband does not tolerate slavery, human trafficking, forced labour, child labour, or child exploitation. Aussie Broadband has various policies which assist in managing human rights risk within its business and supply chains, including:

- Procurement Policy
- Supplier Code of Conduct
- Code of Conduct
- Whistle-blower Policy
- Gifts, Entertainment and Anti-Bribery Policy
- Grievance and Complaints Policy

Aussie Broadband through its Foundation Membership of the Telco Together Modern Slavery Roundtable continues to review and inform its policies, processes, and practices to meet its obligations under the Act.

Aussie Broadband's Modern Slavery Risk Management and Due Diligence Processes

As an Australian-based telecommunications service provider with a 100% onshore workforce (no operations outside of Australia), Aussie Broadband considers the risk of Modern Slavery within its direct business operations as low.

However, Aussie Broadband understands that it can be indirectly exposed to the risk of Modern Slavery through its supply chains as described in the Act.

Aussie Broadband's risk management processes consider modern slavery risk. Any identified risk in our supply chains will be investigated and noted for continuous monitoring.

The steps we've taken this year include:

1. The assessment of potential modern slavery risks in our operations and supply chains, with emphasis on high-risk geographical locations and business transactions.
2. Reviewed our company policies that may raise the risk of modern slavery in our operations and supply chain.
3. Conducting due diligence on local and global supply chains.
4. Review of supplier contracts to ensure they contain terms that are consistent with the Act.
5. Taking steps to address any potential modern slavery risks.

The steps we're prioritising this coming year include:

1. Developing training for staff in modern slavery awareness and regulatory (risk avoidance) requirements.
2. Continue our work with the Telco Together roundtable to implement an industry portal that will seek to lead the way in modern slavery identification, early intervention and prevention.
3. Establish a program to measure the effectiveness of our actions through performance monitoring and reporting.

Aussie Broadband Supply Chains

Aussie Broadband has a primarily Australian supply chain, with an overarching objective of "*buy local, buy Australian first*". This objective ensures that we largely avoid contact with international regions of significant modern slavery risk.

Our supply chain relationships include suppliers from the following sectors:

- Information, communications and technology.
- Property services (including utilities, cleaning, waste management and security).
- Marketing, printing, promotional goods and services.
- Office supplies and corporate clothing.

Aussie Broadband strives to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Aussie Broadband recognises that as a purchaser of goods and services, its suppliers' business conduct and performance can have a significant impact on its performance and reputation within the communities it operates in.

Aussie Broadband conducts ongoing reviews of our supply chain to understand how/ if these sectors have the potential to expose Aussie Broadband to modern slavery and human trafficking risks.

Aussie Broadband's Procurement Policy & Supplier Code of Conduct

Aussie Broadband's Procurement Policy and Supplier Code of Conduct cites our expectations on modern slavery, including that suppliers should not use forced labour, slavery, or servitude in their workforce. We seek confirmation and evidence from vendors and suppliers via the modern slavery self-assessment questionnaire (**SAQ**) that the Telco Together Modern Slavery Roundtable endorsed. Failure to meet the expectations set out in the self-assessment questionnaire and any subsequent investigation into their reported responses can result Aussie Broadband ceasing a commercial relationship with that entity.

Aussie Broadband continues our evolving risk assessment of our supply chain, which will highlight the potential for exposure to Modern Slavery through our:

- Purchase of office consumables such as printing paper, tea, coffee and other kitchen consumables.
- External cleaning services employed by building owners or facilities managers for buildings occupied by Aussie Broadband.
- Purchase of corporate clothing.
- Sourcing of print and promotional goods and services.

Together with the Telco Together modern slavery industry forum, Aussie Broadband is creating a set of overarching principles to identify and manage modern slavery risks within our supply chain. Aussie Broadband will use these principles to inform our procurement and sourcing processes.

Actions undertaken within FY2021 to minimise the risk of Modern Slavery within our supply chain include:

- Ensuring that all purchased office consumables are ethically produced, such as Fairtrade certified tea, coffee, sugar, etc., for our staff kitchens.
- Reviewing and monitoring our corporate clothing providers practices via direct query.
- Implementing a self-assessment questionnaire to include in our procurement practices.

Grievance, Confidential Reporting and Feedback Mechanisms

Aussie Broadband has a dedicated whistle-blower framework. This framework includes a dedicated policy, associated training and an independent third-party provider that allows employees and contractors to raise any issues or concerns in a confidential manner. Our feedback and complaint reporting process can also be used to report any concerns or queries. Grievances can be received via social media and direct correspondence.

We will address and investigate the matter where grievances or concerns are raised. This may include direct engagement with customers and other stakeholders. In these cases, we take steps to investigate and understand the issue(s) and take appropriate action, which may involve referring the matter to the appropriate authorities (in the case of allegations of

modern slavery) or engaging with the customer about areas of concern within our organisation.

Training and Communications

Aussie Broadband's Community Impact (CI) team focuses on environmental awareness, ethical conduct, and modern slavery/ human rights concerns. The CI team also monitors and reports on the sustainable certifications of all suppliers with a view to working with them to improve across these three areas via the sustainable procurement platform givvable.

In FY2022, we are refining our modern slavery awareness training and its intersection with the commercial and procurement lifecycle. This training will have a performance monitoring measure implemented to assess its effectiveness.

Ongoing Modern Slavery Mitigation Strategies:

In the next modern slavery statement, Aussie Broadband will report on the following actions:

- The outcomes of audit and assurance activities on our large goods/ service providers.
- Our continued engagement in industry-wide consultation and collaboration and information/ resource-sharing through the Telco Together Modern Slavery Roundtable membership.
- Our work with suppliers to refine our understanding of their global supply chain.

For further information, please contact Andrew Webster, Head of Risk & Compliance, Andrew.webster@team.aussiebroadband.com.au