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TUAS

Building Better Connections

Tuas Limited
ABN 70 639 685 975

Modern Slavery Statement
For the year ended 31 July 2025

Contents

Background	3
Identity of the Reporting Entity	3
Structure, operations and supply chains of the reporting entity	3
Modern slavery risks in operations and supply chains	4
Actions taken to assess and address risks	4
Assessment of the effectiveness of such actions	4

Background

This is the modern slavery statement for Tuas Limited for the Financial Year ended 31 July 2025 (**FY25**).

Although Tuas Limited uses a share registry office in Australia, it does not otherwise carry on any operational business in Australia. It is an Australian corporation with a consolidated revenue for FY25 in excess of AUD\$100m. It is therefore required by section 13 of the Modern Slavery Act, 2018 (the **Act**) to provide this modern slavery statement which complies with section 16 of the Act.

This statement is approved by the Board of Tuas Limited.

Identity of the Reporting Entity

The reporting entity is Tuas Limited (ABN 70 639 685 975) (**Tuas**), an ASX listed Australian company, having its registered office at Level 4, 68 Waterloo Road, Macquarie Park, New South Wales.

Structure, operations and supply chains of the reporting entity

The business of Tuas comprises only the holding of shares in a Singapore business, Simba Telecom Pte Ltd (**Simba**). Other than the Executive Chairman, Tuas Limited has no employees in Australia and Tuas has no place of business in Australia.

The Board of Simba comprises the Chief Executive Officer who reports monthly into the Tuas board and the Executive Chairman of Tuas Limited. For the purposes of 16(1)(f) of the Act, the process of consultation with Simba is by way of direct report from the Board of Simba to the Board of Tuas at its monthly meetings.

Simba is a facilities-based operator supplying mobile and fixed line telecommunications services to consumers and businesses in Singapore. Simba is domiciled in Singapore and has a Singapore board of directors which makes the operating decisions of Simba.

Simba owns its own mobile network. Equipment for the mobile network is provided by a single well-known manufacturer, which supplies equipment to telecommunications operators worldwide. Simba engages Singapore based sub-contractors for the purposes of building and maintaining mobile cell sites from time to time. It uses the Singapore national fibre network for backhaul to hub sites in Singapore.

Simba has recently entered the fixed line broadband network. Simba owns its own core fixed line network, using leased lines to connect the equipment, and for the last mile uses the Singapore national fibre network.

Simba has a small number of employees in Singapore and Malaysia and contract staff in the Philippines.

Simba does not sell mobile handsets or consumer equipment other than modems which are supplied as part of its fibre broadband services. The modems are sold to Simba by substantial corporations who supply around the world.

Tuas has a whistleblower policy (available at <https://tuas.com.au/pdf/tuas-whistleblower-policy.pdf>). There have been no whistleblower complaints made to Tuas under that policy during FY25.

Modern slavery risks in operations and supply chains

As described in the previous paragraph, Tuas has a very limited number of direct suppliers. The risk of modern slavery existing directly within those suppliers is low. The suppliers themselves, in many cases, have obligations to make their own modern slavery statements in Australia or elsewhere.

Simba contracts with sub-contractors in Singapore for some manual, but generally skilled, labour. Those sub-contractors may themselves be employing temporary foreign workers as is very common in Singapore. These represent low risk of modern slavery, given the robust employment rules in place in Singapore.

Beyond and upstream from direct suppliers to Simba, there may be some risks of modern slavery, but these are difficult for Tuas to identify. For Simba, the most significant upstream risk might exist with equipment manufacturers, whether for core network equipment or for consumer products. These suppliers may themselves be manufacturing in low economic environments or may be using products and raw materials that are sourced in countries with low grade protections for workers. This may mean that their supply chains have some risk of modern slavery.

Actions taken to assess and address risks

Tuas has an Audit and Risk Committee that assesses the risks of modern slavery in its supply chain. The high-level outcome of that assessment is described in the preceding section. The steps taken have been to engage with its primary supplier of equipment. That supplier has provided to Tuas a written statement confirming that it understands the importance of ethical business conduct, including the prevention of modern slavery. It has confirmed that it complies with its policies, which are public documents and contain provisions that limit modern slavery. The supplier has itself lodged modern slavery statements in Australia and elsewhere. A review of the statements and the policy documents, together with the direct written confirmations given to Tuas, gives Tuas confidence that that supplier has taken steps to consider and address risks of modern slavery in its supply chain.

There were no instances of modern slavery identified during FY25.

Assessment of the effectiveness of such actions

Tuas assesses the effectiveness of the steps taken to address modern slavery by its suppliers by:

- annually monitoring its supply chains; and

- seeking confirmation annually from its major suppliers that no known breach of its policies affecting modern slavery compliance; and
- reviewing its own grievance mechanisms and whistleblower reports for evidence of modern slavery in its own operations.

18 December 2025



David Teoh
Executive Chairman