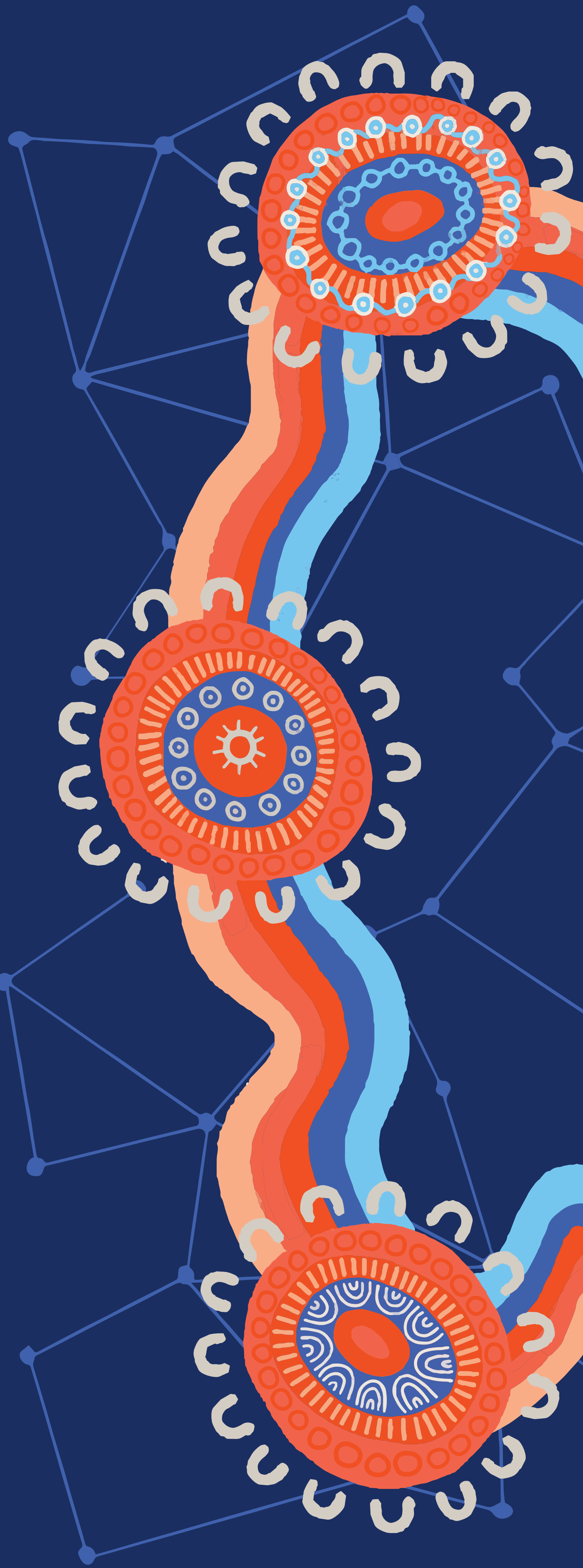
Modern Slavery Act Statement
2025

Acknowledgement

We recognise and acknowledge the existing, original and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands, waterways and sky country across the Australian continent. We pay our respects to their Elders and Ancestors. At Telstra, we are enriched by Aboriginal and Torres Strait Islander peoples' contribution to our organisation, and we commit to working together to build a prosperous and inclusive Australia.

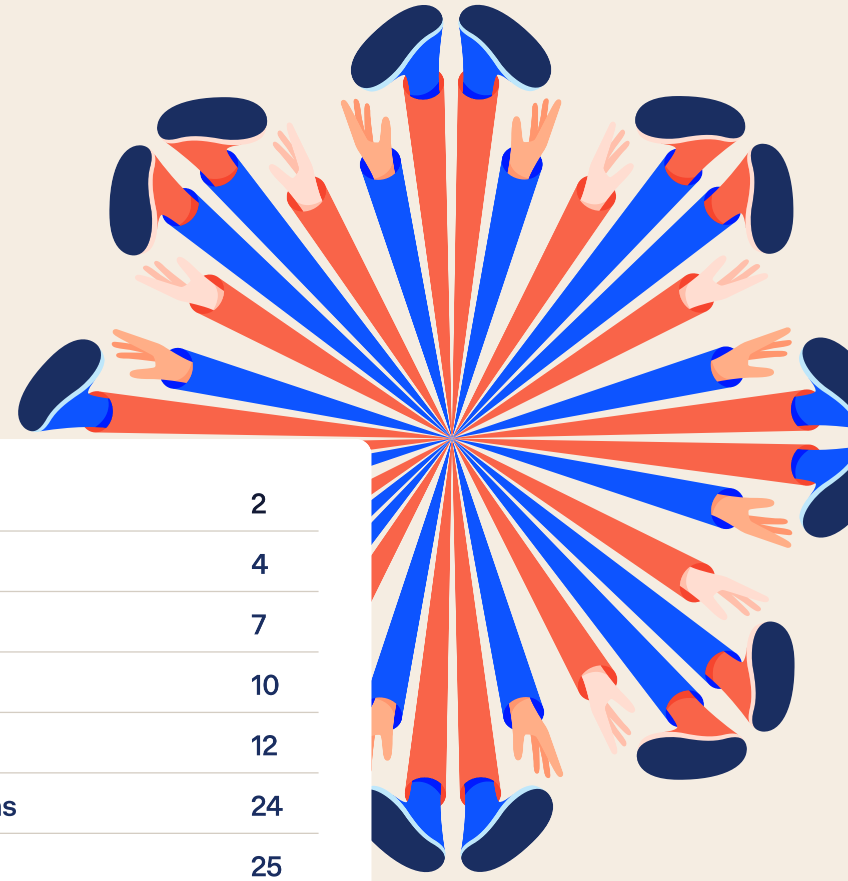


About the artwork 'Connection'

Created by Bobbi Lockyer, a passionate Aboriginal artist hailing from Kariyarra Country in Port Hedland. This artwork represents Telstra's commitment to its customers, community, and the power of connection. The artwork combines the hand painting storytelling and symbols of the oldest continuous culture in the world with the modern digital graphic design of the satellite sky.

Terms used

Throughout this report, the terms Aboriginal and Torres Strait Islander and First Nations are used interchangeably to reference Australia's First Peoples.



Contents

Reporting entities and disclosure notes

The Telstra Group has prepared this statement to meet the requirements of the *Modern Slavery Act 2018* (Cth) (Australian Act), *Modern Slavery Act 2015* (UK) (UK Act) and *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (CA) (Canadian Act).

This statement covers the Reporting Entities described in Appendix 1 of this report. Other than the Reporting Entities, no Telstra Group controlled entity meets the reporting entity criteria under the Australian Act, the UK Act or the Canadian Act.[1]

Capitalised terms and key concepts are defined in the Glossary of this report.

1. This statement does not cover Telstra Super. Telstra Super is the trustee for the Telstra Superannuation Scheme. We do not consider Telstra Super to be a controlled entity as we do not meet the criteria for consolidation under financial reporting standards.

CEO statement

Modern slavery exists in every country in the world today and alarmingly, the numbers are rising. The impact on the people and communities affected is inhumane and unacceptable and we do not walk past it.

Acting as a responsible business is core to who we are at Telstra and part of the behaviours and habits that guide how we show up for our customers and our communities. We have a longstanding commitment to act in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), and we are committed to upholding these in our own operations, our supply chains and through the partners we work with.

We do not tolerate modern slavery in any form. We continuously review our processes to identify concerning labour practices, resolve issues where we find them and try to improve conditions for people who have been impacted.

We also work with our partners and suppliers on their own processes and in FY25, we launched two guidance documents to help them:

- comply with the human rights and modern slavery requirements in our Supplier Code of Conduct, including how to reduce modern slavery risks in their own supply chains
- put in place the mechanisms to surface concerns that could escalate into modern slavery if not addressed.

For our Telstra team, we have improved our training as well as our supplier governance processes including risk monitoring, assessment and mitigation. We also launched an investigations and remediation protocol to guide our people if they do find a labour rights or modern slavery concern in our supply chains.

We take our commitments in this area very seriously and we welcome feedback on this statement. We will continue to be vigilant in our own operations and supply chains and work with the Australian business community to help prevent and address modern slavery.

FY25 highlights

Supported uplift of our suppliers' modern slavery maturity by creating guidance documents to help them implement effective grievance mechanisms and comply with the human rights requirements in our Supplier Code of Conduct.

For more information, see the Uplifting our Supplier Code of Conduct section of this report.

Developed an investigations and remediation protocol to guide our people on how to deal with labour rights issues in our supply chains and sought feedback on the document from a third party which includes advice from modern slavery survivors.

For more information, see the Human rights investigations and remediations protocol section of this report.

Made significant progress to uplift supplier governance activities (risk methodologies and Know Your Supplier (KYS) processes) including implementing a new technology solution.

For more information, see the Continuous improvement of supplier governance across Telstra section of this report.

Annual statement of disclosure

In FY25, we did not identify any instances of modern slavery in our operations or supply chains.

We recognise this does not guarantee the absence of modern slavery, given the challenges in identifying it deeper in supply chains. We remain committed to ongoing due diligence to identify, prevent and mitigate modern slavery.

We did identify some labour practices that concerned us.[2] Finding these issues demonstrates that our processes are generally effective in identifying situations that could escalate into modern slavery. They also alert us to areas where we may need to reinforce our risk management approach. As part of our commitment to transparency, we have chosen to report them in this statement.

The activities described in this statement generally apply across the Telstra Group as a whole. Reporting Entities Telstra Health, Digicel Pacific and Versent and certain owned or controlled entities in the Telstra Group, such as Fetch TV, are not fully integrated into Telstra operations. The activities of these entities in response to modern slavery risk may differ to that of the remainder of the Telstra Group. Where we have identified material differences in the activities of Reporting Entities, we have set these out in this statement.

This statement is made pursuant to section 14 of the Australian Act, section 54(1) of the UK Act and section 11 of the Canadian Act, as relevant. It is a joint statement for the purposes of the Australian Act. It constitutes the statement of each of the Reporting Entities for the year ended 30 June 2025[3] and has been prepared in consultation with those Reporting Entities.

Australian Act

This statement was approved on behalf of the Telstra Group by the Board of Telstra Group Limited under section 14(2)(d)(ii) of the Australian Act on 12 August 2025.

Vicki Brady

CEO and Managing Director
of Telstra Group Limited

UK Act

This statement was approved on behalf of Telstra UK Limited by the Board of Telstra UK Limited under section 54(6)(a) of the UK Act on 19 August 2025.

Margaret Chan

Director of Telstra UK Limited

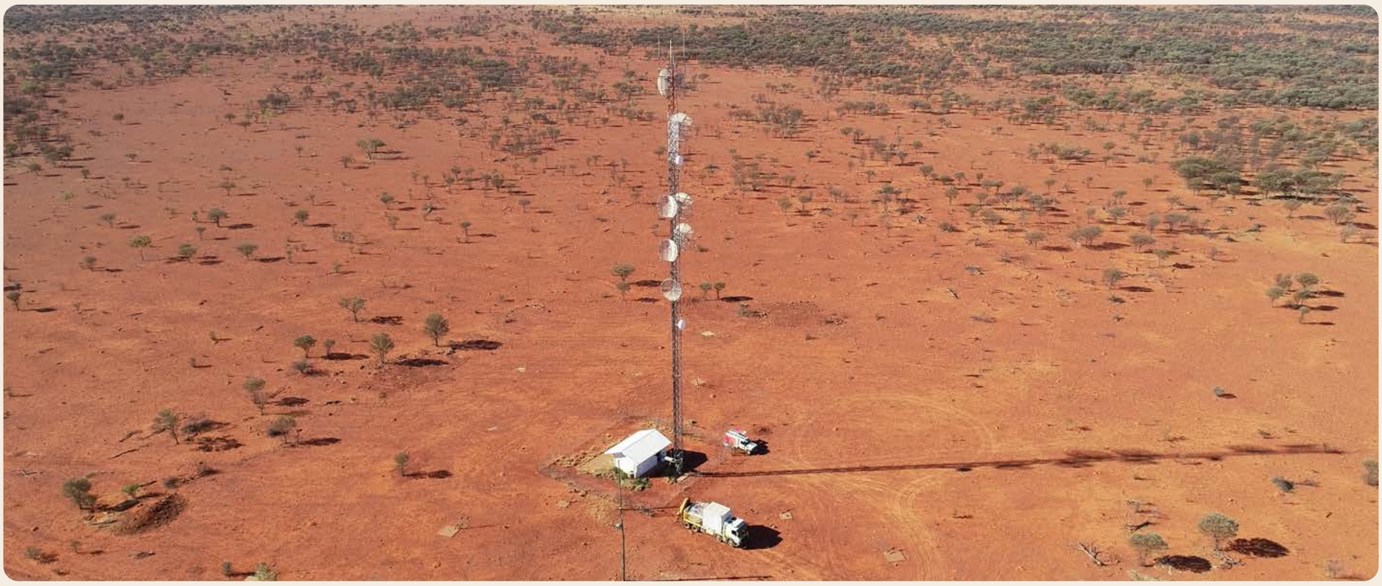
Canadian Act

This statement was approved on behalf of Telstra Incorporated by the Board of Telstra Incorporated under section 11(4)(a) of the Canadian Act on 15 August 2025. In accordance with the requirements of the Canadian Act and in particular section 11 thereof, I attest that I, in my capacity as a director on the Board of Telstra Incorporated, have reviewed the information contained in the statement on behalf of the Board of Telstra Incorporated. Based on my knowledge and having exercised reasonable diligence, I attest that the information in the statement is true, accurate and complete in all material respects for the purposes of the Canadian Act for the 2025 financial year. I have the authority to bind Telstra Incorporated.

Thomas Roark Stasko

Director, Chief Executive Officer
and President of Telstra Incorporated

25 August 2025



2. For more information, including on our approach to remediation, see the Constructive engagement with suppliers, Process to implement the Supplier Governance Framework, Ensuring fair treatment of agency workers, Proactive engagement with suppliers and Improving labour practices in our promotional products supply chain sections of this report.
3. All disclosures in this statement are as at 30 June 2025, unless otherwise noted.

Who we are

Our structure

The ultimate parent entity in the Telstra Group is Telstra Group Limited (TGL). TGL is a 'for profit' company limited by shares incorporated in Australia whose shares are publicly traded on the Australian Securities Exchange (ASX).

As at 30 June 2025, the Telstra Group has a direct or indirect interest in over 200 controlled entities across approximately 30 countries. In FY25, we acquired Boost Mobile and divested our controlling interest in Sapio as well as our interest in Titanium Ventures Fund II.

For a complete list of the controlled entities in the Telstra Group as at 30 June 2025, see the 'Consolidated Entity Disclosure Statement' in our 2025 Annual Report on our website.

As at 30 June 2025, we provide around **24.9 million retail mobile services** and **3.4 million consumer and small business bundle and data and voice-only services**

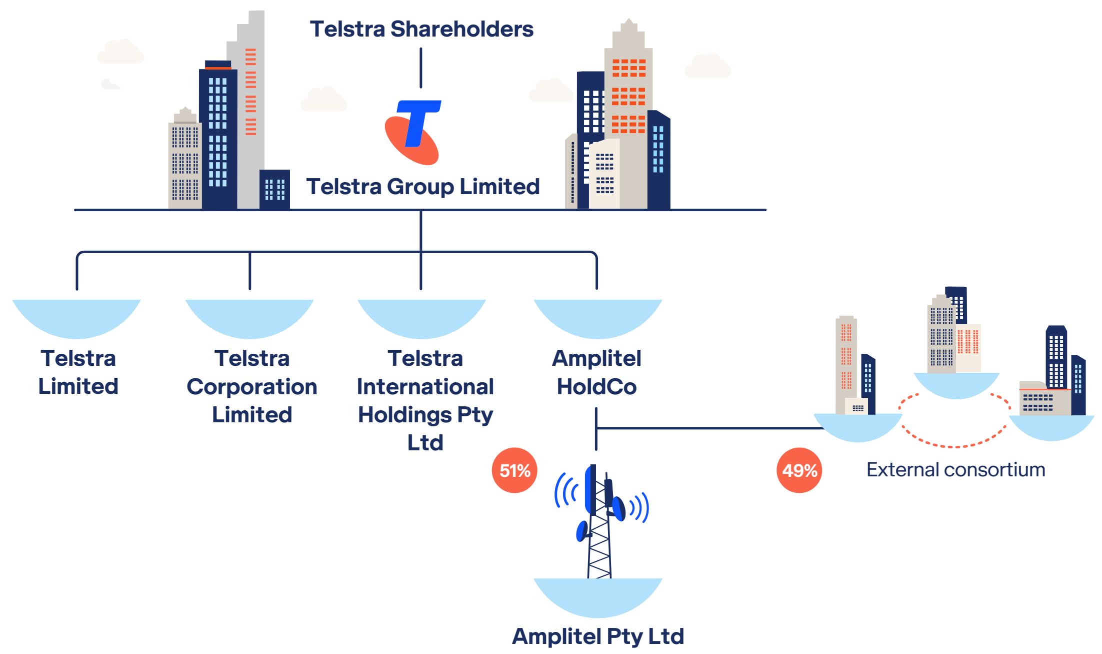
We connect to points of presence in close to **200 countries and territories** around the world

Our operations

Telstra is Australia's leading telecommunications company. We offer a full range of products and services across a customer base that includes consumers, small business, large enterprise and government organisations.

Details of the specific business of each Reporting Entity are set out in Appendix 1 of this report.

For more information on our business, see our **2025 Annual Report** on our website.



Our workforce

Our workforce by headcount[4]

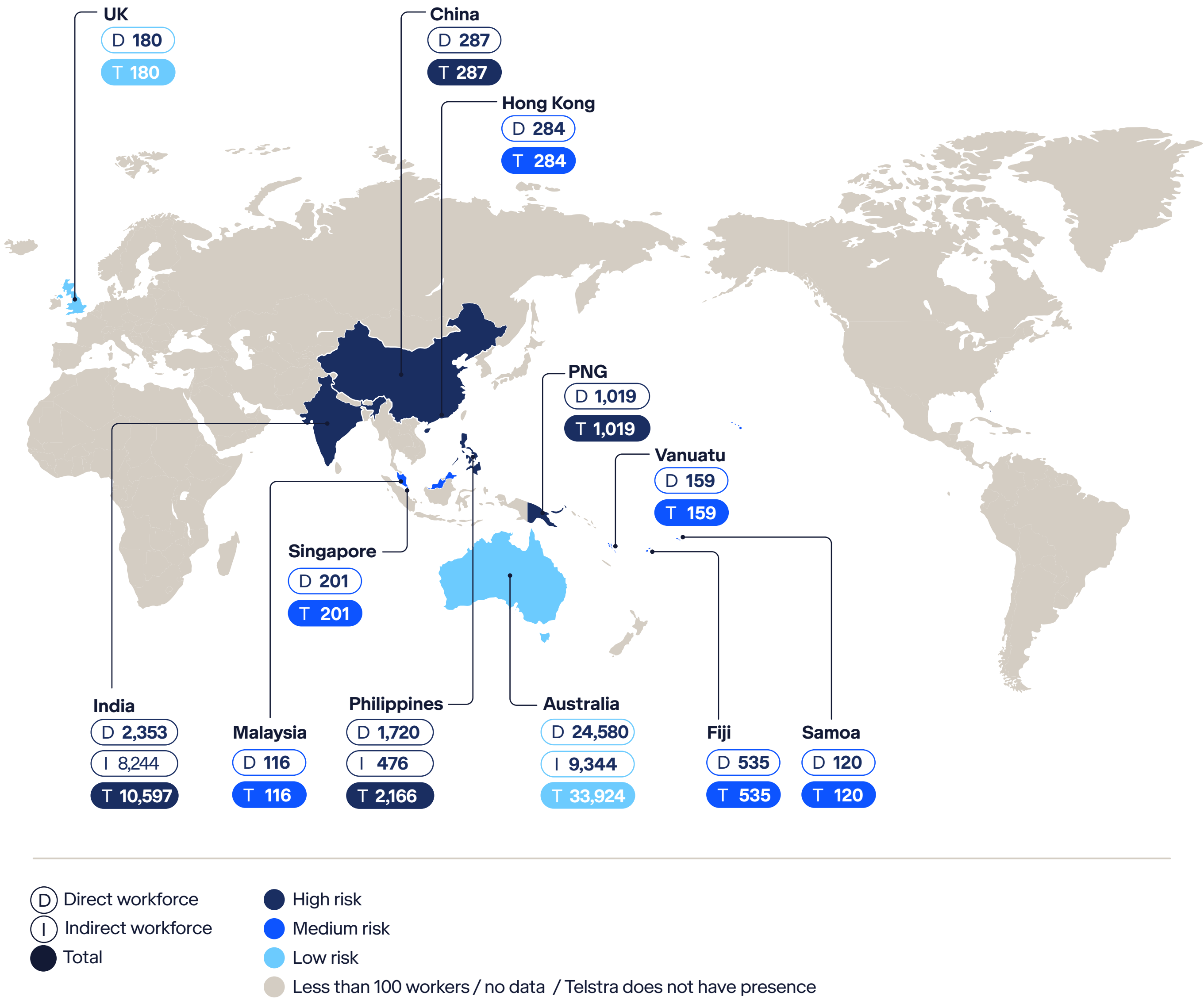
Telstra relies on a highly diverse workforce and engages people with broad and varied skillsets, ranging from salespeople through to technology experts. Our workforce is comprised of Telstra employees and workers engaged through industry partners.

Most of our indirect workforce supports Telstra in delivering both customer-facing and back-office processing services. Our main centres for indirect workers outside Australia are India and the Philippines.

	Direct workforce	Indirect workforce
Globally	31,841	18,510
Outside Australia	7,261 (22.8% of global direct workforce)	9,166 (49.5% of global indirect workforce)
Locations	25 countries	34 countries

Our global labour rights risk profile for key locations

Telstra's direct and indirect workforce exposure to labour rights risks by locations (with more than 100 workers)[5]



4. All people data in this statement is expressed as headcount, not full-time equivalents (FTE), is as at 30 June 2025 and is based on the data recorded in Telstra's people management system.
5. See 'Risk rating' in the Glossary of this report.

Our supply chains

In FY25

Telstra engaged directly with[6] more than **5,500 suppliers** from **89 countries**

Approx **74%** of total spend was with our top 100 suppliers

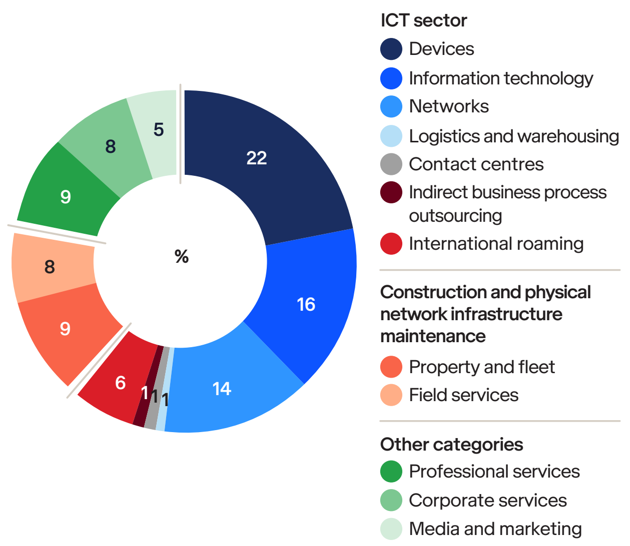
Telstra's supply chains are large, complex and constantly evolving. We rely on our direct suppliers (tier 1) for a wide array of products and services. These suppliers in turn are supplied by their own suppliers (tier 2, 3, 4 suppliers and so on). As we move down our supply chains, gaining visibility gets progressively harder.

Most of our supplier spend is on information and communications technology (ICT) and network infrastructure, including electronics and network components. We do not manufacture our own products. Instead, we procure finished goods from large multinational companies and work with original design manufacturers to produce Telstra-branded devices.

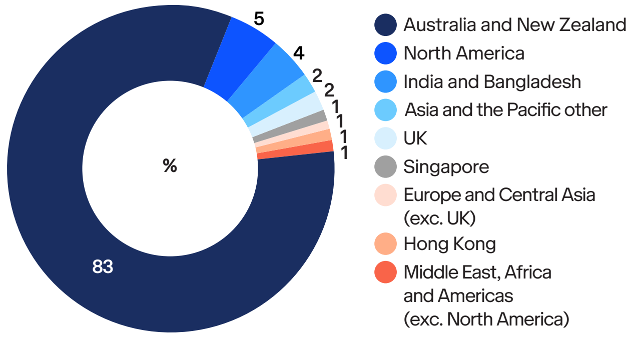
The services we procure are predominantly provided from Australia, India and the United States of America (USA). The goods we procure, while predominantly purchased in Australia, are manufactured across the world. Major manufacturing locations include China, Vietnam and Indonesia.

Approximately 87 per cent of what we spend directly is with suppliers based in low-risk countries.[7] We recognise these suppliers may be headquartered in or manufacture products in other countries. We look at both the risk posed by a direct supplier and by suppliers further down our supply chains, including their location.

% of Telstra direct supplier spend by category[8]



% of Telstra direct supplier spend by country[9]



6. These figures capture Telstra Group entities who use Telstra's centralised procurement processes. These figures do not include Telstra's owned or controlled entities who do not use Telstra's centralised procurement processes. For examples, see the How we consult within our group section of this report.
7. See 'Risk rating' in the Glossary of this report.
8. For a description of the categories, see the Glossary of this report.
9. Country location is based on the supplier's registered address in our vendor management system. This may not necessarily reflect the country where the product or service is sourced from.

Our approach

Our purpose, objectives, behaviours and habits

Our purpose is to build a connected future so everyone can thrive. Our behaviours and habits are what we strive to practice every day so we can be our best.

Our 'Big Three' behaviours and habits are 'Look Beyond' ('See the Big Picture', 'Strive for Customers' and 'Learn and Adapt'), 'Work as One' ('Listen First', 'Speak Up' and 'Align and Commit') and 'Make a Difference' ('Do What Matters', 'Own It' and 'Act with Care').

Each behaviour is supported by specific habits which can be done by every employee, every day and are the things we seek to emphasise within our culture. These behaviours and habits support our people to deliver on our compliance obligations and achieve our environment, inclusion and responsible business ambitions.

Working to prevent modern slavery in our operations and supply chains is necessary to support our purpose and company objectives and embody our behaviours and habits.

Modern slavery governance

Modern slavery risks relating to our direct workforce and supply chains are managed through our risk management and compliance framework. Our compliance framework defines how we manage our obligations, including those relating to wages and benefits and provision of a healthy, safe and sanitary workplace. Modern slavery reporting is also managed under the compliance framework to help ensure we report annually on the risks of modern slavery in our operations and supply chains.

For more information on our compliance and risk management framework, see our **2025 Corporate Governance Statement** and **2025 Annual Report** on our website.

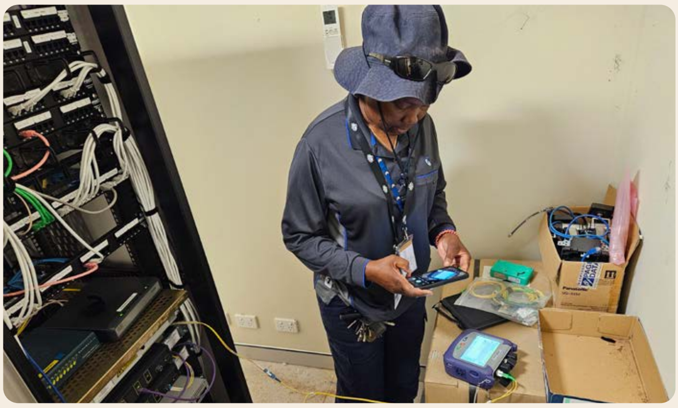
Telstra recognises the importance of ensuring significant environmental, social and governance (ESG) issues, such as modern slavery, are overseen at the highest level of Telstra. During the year, the Board reviewed its committee structure and replaced the Audit & Risk Committee with two separate committees, being the Audit Committee and the Risk & Sustainability Committee. The Risk & Sustainability Committee's responsibilities include assisting the Board to oversee ESG matters. This involves reviewing significant developments and trends in ESG, monitoring the Telstra Group's ESG performance, including against targets, and considering significant issues relating to ESG, including making recommendations to the Board on modern slavery disclosures.

Our policies

Telstra's Group Policies support our commitment to respect human rights and manage the risk of modern slavery and other labour rights risks in our operations and supply chains.

Our Group Policy Governance Framework and Group Governance Operating Model set out the expectations for entities in the Telstra Group to adopt or align to the Group Policies and supporting frameworks or to seek an exemption. We continue to work towards full adoption of, or alignment to, the Group Policies by all Telstra Group entities.

Our Governance, Risk and Compliance Tool documents all Group Policies and any current entity exemptions.



Policy	What it covers	Who it applies to	How we implement it
Ethics, human rights and grievance mechanisms			
Code of Conduct (Code)	• Our global approach to ethical and compliance issues, including modern slavery • Where to go for help or to raise concerns, including our Whistleblowing Service.	All directors, employees and contractors in the Telstra Group unless an exemption has been granted.	• Covered by our Business Essentials Training • Published on Telstra's public website and intranet • Reviewed annually • Supported by Group Policies • Serious breaches are investigated by the Chief Risk Office Investigations team or the HR Global Case Management team • Data on material instances of misconduct is reported to the People & Remuneration Committee of the Board twice a year.
Human Rights Policy	• Our commitment to respect and support human rights, including labour rights • How to make reports about concerns or breaches.	All employees, contractors, notified individuals, suppliers, business partners and other third parties.	• Covered by our Business Essentials Training • Published on Telstra's public website and intranet • Reviewed annually • Supported by a 'plain English' Human Rights Policy guidance document • Approved by the Telstra Group CEO.
Whistleblowing Policy	Protections for those reporting concerns about illegal, unethical or improper conduct or state of affairs at Telstra.	All directors, current and former employees, their relatives and dependants as well as suppliers.	• Covered in our Business Essentials Training • Published on Telstra's public website and intranet • Reviewed annually • Supported by a 'Quick Guide' on how to use the Whistleblowing Service • Referenced, with links to our Whistleblowing Service, in other relevant Telstra policies.
How we protect our workers			
Discrimination, Bullying, Harassment and Victimisation Policy	Our commitment to providing a safe and inclusive working environment.	All employees and contractors of the Telstra Group, other than entities within the USA, and other notified persons.	• Covered in our Discrimination, Bullying, Harassment and Victimisation Training • Published on Telstra's public website and intranet • Reviewed annually • Supported by a guidance document.
Diversity, Equity and Inclusion Policy	• Our commitment to set and assess objectives for diversity, equity and inclusion (DEI) and review progress • Building a safe culture of inclusion.	All directors, employees and contractors in the Telstra Group unless an exemption has been granted.	• Published on Telstra's public website and intranet • Reviewed annually • Supported by our Global DEI Strategy, DEI Council, five employee representation groups and action plans related to accessibility, First Nations, gender and equity • Dedicated learning pathways available for DEI and for individual diversity dimensions.

<table>
<tr><th>Policy</th><th>What it covers</th><th>Who it applies to</th><th>How we implement it</th></tr>
<tr><td>Health, Safety and Wellbeing Policy</td><td>How we keep our people, partners, customers and the community safe and well
Our commitment to meet all applicable health and safety laws at minimum.</td><td>All employees and contractors in the Telstra Group, and other notified persons, unless an exemption has been granted.</td><td>Covered by our Business Essentials Training
Published on Telstra's public website and intranet
Reviewed annually
In FY25, we simplified the policy so it is in 'plain English' and easy for our teams to understand and apply.</td></tr>
<tr><td colspan="4">How we govern risk in our supply chains</td></tr>
<tr><td>Dealing with Suppliers and Other Third Parties Policy</td><td>The principles that apply when engaging with suppliers or third-party agents, including the use of the Supplier Code of Conduct and labour practices risk management
Avenues to make reports about concerns or breaches.</td><td>All employees and contractors of the Telstra Group and any person notified.</td><td>Covered by our Procurement Principles Training and the Supplier Governance Framework Training
Published on Telstra's intranet
Reviewed every second year
Supported by the Supplier Governance Framework.</td></tr>
<tr><td>Supplier Code of Conduct</td><td>The minimum standards we expect from our suppliers and their supply chains, aligned with the principles of the UN Global Compact, industry guidelines, International Labour Organisation Standards and legislation
Prohibitions on modern slavery and concerning labour practices
Requirements on suppliers to self-report breaches through a dedicated online portal.</td><td>Our suppliers.</td><td>Covered by our Supplier Governance Framework Training
Published on Telstra's public website
Reviewed annually
Supported by our supplier due diligence process and audit program and our Supplier Governance Framework
Supported by new supplier guidance documents on our human rights requirements and effective grievance mechanisms
Forms part of our standard purchasing terms
Provided to most suppliers when we contract with them.</td></tr>
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Uplifting our Supplier Code of Conduct

As part of the annual review of our Supplier Code of Conduct, we engaged a third-party expert to review and uplift our human rights and modern slavery requirements on our suppliers in line with the UNGPs.

To help uplift our suppliers' capabilities, we also developed a guidance document on the human rights, including labour rights, expectations in our Supplier Code of Conduct. The guide explains key human rights concepts, provides resources and suggests practical examples of actions that suppliers can take to help them comply with their obligations.

We recognise that our suppliers are diverse and may have varying levels of sophistication when it comes to managing modern slavery risks in their operations and supply chains. The guide allows suppliers to select processes appropriate for them based on their size.

Our modern slavery risks[10]

Telstra's main modern slavery risks are:

Risk area	Why it is a risk area: Higher-risk category/sector	Higher-risk country/region	Vulnerable population	Higher-risk business model
Operations				
Contingent and indirect workforce outside Australia[11]		✓ Workers located in higher-risk jurisdictions	✓ May include migrant workers or visa holders	✓ Workers not employed directly
Workers at retail partners and partner business centres			✓ May include migrant workers or visa holders	✓ Workers not employed directly
Supply Chain				
ICT products[12]	✓ Higher-risk industry associated with known child labour concerns e.g., in artisanal mines	✓ Often mined or manufactured in higher-risk jurisdictions	✓ May include migrant workers	✓ Higher-risk components may be produced by lower tier suppliers
Non-ICT devices[13]	✓ May include higher-risk products, or products with higher-risk components	✓ May include higher-risk jurisdictions	✓ May include low-skill or low-wage labour	✓ Higher-risk components may be produced by lower tier suppliers
Construction and physical network infrastructure maintenance	✓ Industry associated with known labour rights risks	✓ Some physical network infrastructure located in higher-risk jurisdictions	✓ May include migrant workers, visa holders, low-skill, low-wage or temporary labour	✓ Industry with high levels of subcontracting
Products used to build, support and maintain physical network infrastructure	✓ May include higher-risk products associated with known forced and child labour concerns	✓ May include higher-risk jurisdictions	✓ May include low-skill or low-wage labour	✓ Often produced by lower tier suppliers
Promotional products, branded apparel and marketing merchandise	✓ May include higher-risk products or industries (e.g., cotton, textile manufacturing)	✓ May include higher-risk jurisdictions	✓ May include low-skill or low-wage labour	✓ Higher-risk components may be produced by lower tier suppliers
Cleaning and waste management	✓ Industry associated with known labour rights risks such as substandard working conditions	✓ May include higher-risk jurisdictions	✓ May include low-skill or low-wage labour or temporary migrant workers	✓ Industry with high levels of subcontracting
Transport/logistics	✓ Increased industry risk due to pressure on supply chains caused by increased online shopping and world events	✓ May include higher-risk jurisdictions	✓ May include low-skill, low-wage or temporary labour, industry with frequent use of recruiters	✓ Industry with high levels of subcontracting
Solar panels and batteries	✓ Increased industry risk due to pressure on supply chains caused by demand for solar and batteries	✓ May include higher-risk jurisdictions	✓ Industry associated with risk of state-imposed forced labour and exploitation of minority groups	✓ Higher-risk components may be produced by lower tier suppliers
Carbon credits		✓ May include higher-risk jurisdictions	✓ May include low-skill, low-wage or temporary labour	✓ Higher-risk components may be produced by lower tier suppliers
Renewable energy projects via power purchase agreements	✓ Increased industry risk due to pressure on supply chains caused by demand for renewable energy	✓ May include higher-risk jurisdictions	✓ Industry associated with risk of state-imposed forced labour and exploitation of minority groups	✓ Higher-risk components may be produced by lower tier suppliers

10. This table is an overview only. The specific modern slavery risks vary depending on the relevant product, service or project.
11. For example, employees of our indirect delivery partners.
12. For example, ICT devices and accessories.
13. For example, energy metering devices.

Overall approach

‘Labour risk in the supply chain’ is a salient human rights issue for Telstra.[14]

We assess Telstra is most likely to be **directly linked** to modern slavery impacts through our business relationships.[15] We recognise it is possible we might **cause** or **contribute to** modern slavery if the risk management controls outlined in this statement are not effective.

How we assess risk

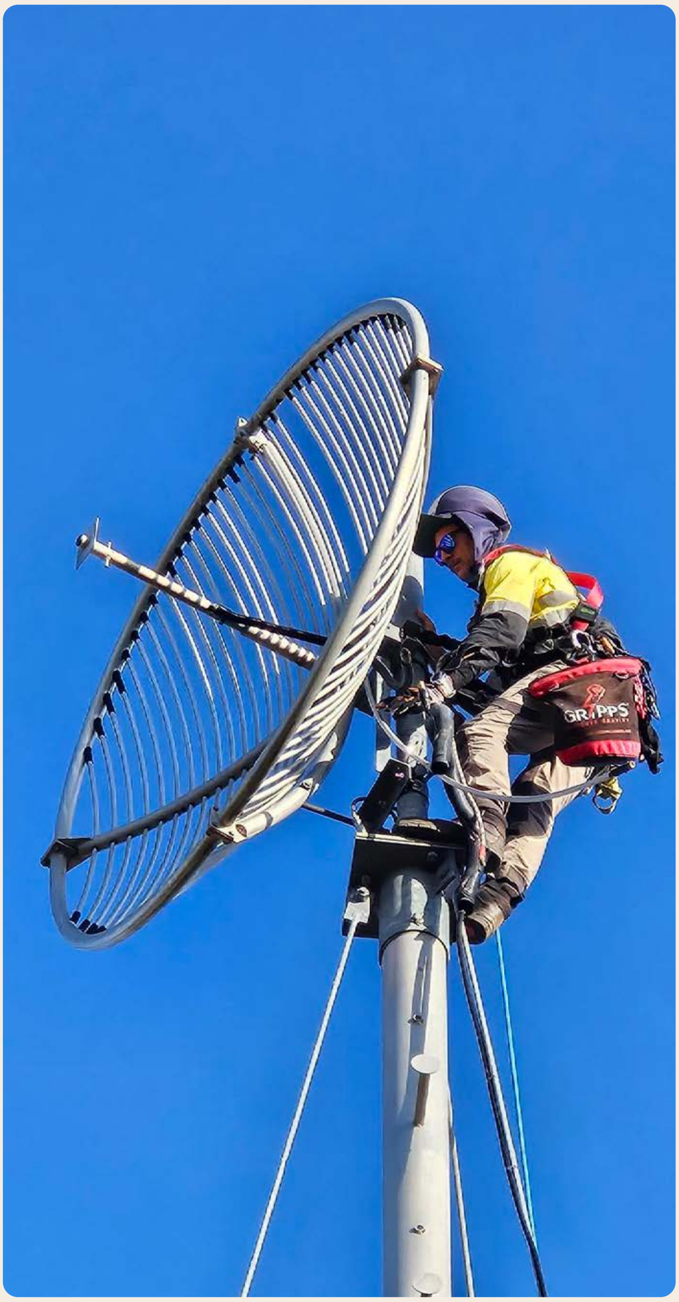
In FY20 we engaged an independent third party to undertake an initial modern slavery risk assessment of our global operations and supply chains. We update this regularly via periodic modern slavery risk reviews to capture changes to Telstra’s operations and supply chains.

In line with the UNGPs, our risk assessments look at four key modern slavery risk factors:

- Country/region
- Category/sector
- Vulnerable populations
- Business model[16]

We use diverse inputs to monitor, prioritise and address key risks effectively:

- Learnings from supplier due diligence process, screening tools and grievance and issues tracking
- Active engagement in human rights forums
- Feedback from external stakeholders
- Review by internal subject matter experts



There has been no material change in Telstra’s modern slavery risk profile over the reporting year. Our areas of operation and our supply chains remain broadly the same.[17] We had an overall reduction to both our direct and indirect workforces.[18] This was largely due to the reset of the Enterprise business along with other organisational changes, some of our direct workers becoming indirect workers as they moved to our joint venture with Accenture, the divestment of Sapio, decreases in indirect workforce across various vendors and reclassification of certain workers from indirect to direct. This reduction meant since FY24:

- our direct workforce locations **reduced** from 26 countries to **25**
- our indirect workforce locations **reduced** from 39 countries to **34**.

14 For more information on our full list of salient human rights issues and how we assess them, see our 2025 Bigger Picture Sustainability Report on our website.
15. Assessed according to the UNGPs’ continuum of involvement under Guiding Principle 13 of the UNGPs.
16. For the purposes of the risk assessment, we consider whether Telstra has visibility or control over workers’ conditions or whether higher-risk products or services may be present in lower tiers of Telstra’s supply chains where we may not have full visibility.
17. For more information on how our mergers and acquisitions activity affected our operations and supply chains, see the How we consult within our group section of this report.
18. For more information, see the Our workforce section of this report.

How we address our modern slavery risks

In our operations

Employees

Telstra's global employment framework

Covers all Telstra Group direct employees

Compliance with laws

- Our payroll systems and compliance controls help ensure that our employees are paid correctly and in a timely way
- We regularly audit our payroll arrangements to help ensure ongoing compliance
- We periodically review the labour laws in locations where we operate to check we meet requirements and remedy any gaps

Collective bargaining and consultation

- We consult with our people before we implement significant changes
- Our people have the freedom to form or join a trade union, bargain collectively and engage in trade union activities in accordance with local laws
- In Australia, **92.6%** of our direct workforce are covered by our enterprise agreements

Treating our people well

Our employment conditions and employment processes generally go beyond what is required by local law to help us respect and support the human rights of employees and provide a safe and fair working environment

Our Main Employing Entities use an online recruitment management system which helps make sure we follow our policies and processes, including generating contracts that meet our standards and confirming the person meets minimum employment age.

For more information on how we respect and support our people, including our approach to health, safety and wellbeing, see our **2025 Bigger Picture Sustainability Report** on our website.

Consulting with our people

Our new Australian enterprise bargaining agreements came into effect in FY25.

From FY24 to FY25, we worked closely with union and employee representatives to negotiate replacements to the Enterprise Agreements that apply to most employees of our Main Employing Entities. Through this process, union, employee and company representatives met regularly to share proposals for change, ask questions and provided detailed responses to proposed changes. We shared regular updates with our employees and received and responded to feedback from employees through various channels such as Telstra's private social network.

The proposed Enterprise Agreements were ultimately voted on by the employees who would be covered by them. All were voted up by a majority of voters and approved by the Australian Fair Work Commission. They came into effect on 1 October 2024.

Management of higher-risk operational activities and locations

We recognise that when workers are not employed directly by us, we may not have full visibility of, or control over, how they are treated, and we need to implement a robust risk management framework. This helps us uphold workers' labour rights and ensure workers have access to appropriate grievance mechanisms.

Our indirect partner service model

We engage indirect workers:

- for high volume repeatable activities e.g., billing and assurance
- to manage customer relationships e.g., contact centres and digital platforms
- to operate our networks and technology solutions
- to provide professional services.

Some of these workers are in higher-risk locations[19] for modern slavery, such as India and the Philippines.[20] They are either engaged as contingent workers or through longer-term delivery partnership arrangements.

Our retail network service model

We use a network of stores and technology business centres across Australia to sell to our consumer and small business customers. Along with Telstra-owned and operated stores, we have dealership agreements with partner Business Centres and retail partners to sell Telstra products and services.

Risk mitigations for our indirect partner service model and retail network service model	
Training	Partners must complete mandatory training to access Telstra systems. The training sets out the standards and behaviours we expect and how to raise a concern if these standards are not being met.
Grievance mechanisms	Telstra provides a channel where partners and their employees can raise issues with us. Partners and their employees can also raise issues using the partners' own grievance mechanisms or Telstra's Whistleblowing Service.
Audits	Our standard contract terms give us the ability to audit partners if there are concerns about a partner's compliance with the terms of their agreement, including the requirement to comply with applicable laws.
Failure to comply	We have contractual remedies if a partner fails to comply with relevant Telstra policies such as the Supplier Code of Conduct, laws or regulations applicable to their operations. Such a failure constitutes breach of the relevant agreement, and depending on the seriousness of the breach, Telstra's recourse may include termination of the agreement, clawback of amounts paid or suspension of the partner's ability to undertake certain sales or service activities.
Delivery partner specific mitigations	
Monthly attestation or audit	In India, we collect copies of employment contracts for property and facilities management workers who work at Telstra premises and audit them monthly for compliance with labour laws using a third-party auditor. We request that larger partners with workers located at Telstra premises provide a monthly declaration confirming compliance with labour laws. For partners with workers temporarily located on Telstra premises, we include clauses in relevant contracts requiring partners to maintain and provide artefacts proving compliance with labour laws.
Retail network specific mitigations	
Standard agreements	We have standard dealership agreements for certain categories of our partners which require them to comply with modern slavery legislation.
Annual attestation	We request our Business Centre and smaller retail partners complete an annual attestation of compliance with certain terms of their agreement, including compliance with employment and labour obligations.

19. See 'Risk rating' in the Glossary of this report.
20. For more information on our indirect workforce, see the Our workforce by headcount section of this report.

Ensuring fair treatment of agency workers

Last year we reported that we investigated a complaint from a Telstra agency worker in Australia who claimed that their employer was demanding reimbursement for visa sponsorship-related costs and withholding their pay. After the issue was resolved, we worked with the Telstra partner to confirm they have implemented additional controls to manage transparency and control around subcontracting.

We concluded that:

- the partner has investigated the issue and has not identified other similar issues
- the partner has terminated their relationship with the supplier in question
- their published policies show a commitment to stamping out modern slavery
- their training programs regarding modern slavery are compulsory for relevant staff and contractors and, while not specifically noting a prohibition on charging workers for visa sponsorship related costs, the training is direct and specific to modern slavery
- the partner has made improvements to the management of their supply chains that lower the risk of a similar issue in the future, including more frequent audits of compliance within their supply chains.

We will continue to work constructively with the partner at an operational and executive level to reinforce our common commitment to stamping out modern slavery in Australia.

In conjunction with the actions taken by the partner, we've taken steps to check the effectiveness of our own work. We arranged for worker voice surveys to be conducted across sites where the supplier delivers services for us, allowing us to gather feedback from affected workers. The worker voice surveys highlighted respect and equality and health and safety as areas for improvement. The supplier is in the process of implementing actions to address the results of the worker voice surveys.

In addition, we engaged a third-party auditor to conduct comprehensive site audits on three of the supplier's sites. No evidence of the initial complaint was found. The audits did show findings related to health and safety, discrimination, working hours, business ethics and environment, which the supplier is in the process of remediating.

While the worker voice survey and audit showed our work with the partner was effective to resolve the initial issue, it also highlighted the importance of taking additional steps to check the outcome of our actions and find further opportunities for uplift.

In our supply chains

Constructive engagement with suppliers

We regularly work with our suppliers to assess whether they are adhering to our standards. Many of our suppliers have robust risk management processes in place and collaborate with us to meet our requirements.

If we identify concerns about supplier performance, we engage constructively with the supplier to drive improvements to deliver the best outcomes for the workers we are seeking to protect, the community and the environment. In instances where suppliers are not willing to cooperate, despite our attempts at engagement, we may terminate their contracts or switch to alternate suppliers.

Proactive engagement with suppliers

We recognise that many of our suppliers are highly sophisticated and have robust risk management processes in place. In FY25, we organised regular meetings with a large network equipment supplier to better understand their supply chain risk management processes and to reflect these in our contractual agreement. This constructive dialogue allowed us to:

- get comfort that the supplier has appropriate processes in place to investigate lower tiers of our supply chains and that it is proactively monitoring for, and remediating, modern slavery and labour rights issues
- consider opportunities to learn from each other's experiences so we can both uplift our processes to better manage human rights and modern slavery risks.

Our processes to manage supply chain risk

Sets out the minimum standards we expect from our suppliers	Supplier Code of Conduct[21]		
Sets out principles for how we govern our suppliers	Risk management framework[22]	Telstra Group Policies[21]	Telstra Group Code of Conduct[21]
Sets out the minimum risk management activities that must be performed, using a risk-based approach, to meet the principles	Supplier Governance Framework		
Processes to implement the Supplier Governance Framework	Supplier selection: Supplier risk assessment against Supplier Risk Categories; Supplier due diligence	Standard contracts: Contractual obligations to comply with our modern slavery and human rights requirements	Monitoring: Management and ongoing review of supplier
Program to audit higher-risk suppliers	Sustainability audit program		

Sustainability audit program

- Site audits and worker voice surveys
- Corrective action plans
- Verification and closure of corrective actions

Governance and reporting[22]

21. For more information see the Our policies section of this report.
22. For more information see the Our approach section of this report.

Supplier Risk Categories

Operational	Commercial	Resilience (business continuity)
Privacy	Information security	Health and safety
Anti-bribery and anti-corruption	Fraud	Labour practices
Environmental practices	Export controls	Trade sanctions

Supplier Governance Framework

The Supplier Governance Framework applies to our centralised procurement process, which is used by most of Telstra's controlled entities.[23]

Continuous improvement of supplier governance across Telstra

Last year we reported that we are looking to uplift the technology and operating model underpinning our supplier governance and third-party risk management systems.

During FY25, we completed this planned uplift and implemented a new technology solution that is designed to streamline our supplier governance processes and:

- **Enhance our inherent and residual risk methodologies**
- **Enhance our data capturing capabilities** to provide deeper insights into our supply chain risks, including those relating to modern slavery and human rights
- **Improve how we monitor risk mitigation activities** across the business
- **Streamline our KYS processes** based on inherent risks levels

We identified new external information sources to enhance our ongoing supplier monitoring program. We are working to integrate these into our technology solution to help ensure the information is easily accessible to our teams.

23. The specific procurement process adopted by a controlled entity will depend on the level of Telstra's ownership, the relevant entity's circumstances, the nature of its operations and its jurisdiction. Telstra Health, Digicel Pacific, Fetch TV and Versent are examples of entities that do not use the Telstra Group procurement function or centralised procurement processes.

Process to implement the Supplier Governance Framework

Before we engage a supplier

Risk assessment

- To identify the inherent risks associated with a supplier engagement based on the Supplier Risk Categories.

KYS platform

- Suppliers are required to complete our supplier due diligence questionnaire, including uploading and maintaining information on their risk management systems and providing evidence of their accreditations
- Mandatory for domestically contracted suppliers[24]
- Applies to new contracts
- We periodically revise the questions to respond to supplier feedback, regulatory change and emerging issues
- **75% of domestic suppliers were onboarded via KYS as at 30 June 2025.**

Enhanced due diligence (EDD)

- Independent third party conducts EDD screenings of high-risk suppliers
- Screening includes a review of public domain sources including company registry information, online media sources, publicly available government agency information and court records, as well as various database resources
- Findings are mapped to the Supplier Risk Categories, enabling us to review and remediate issues
- **In FY25, we obtained 30 EDD reports on identified suppliers.**

When we engage a supplier

Contractual obligations to comply with our modern slavery and human rights requirements

- We use our standard Telstra Supply Agreement with most suppliers
- This agreement requires suppliers to comply with our Supplier Code of Conduct, comply with modern slavery laws, implement policies and procedures to manage their supply chains and provide evidence of their compliance on request
- When we make procurement decisions, we consider a supplier's ability to meet our Supplier Code of Conduct requirements and may include additional social, environmental or ethical requirements based on a supplier's risk profile
- We can terminate a supplier's agreement if they breach these provisions and suppliers must self-report breaches through a dedicated online portal.

Through the life of the relationship

Management and ongoing review of supplier

- We actively monitor domestically-contracted suppliers by reviewing public records including media reports, civil litigation and conducting criminality and bankruptcy checks
- High-risk alerts are reviewed by relevant Telstra business units, contract owners, risk leads and supplier relationship owners
- If allegations are raised publicly about unacceptable labour practices in our supply chains, we engage with suppliers to help ensure workers' rights are appropriately respected
- We consider further due diligence for higher-risk suppliers or if we are not satisfied with the supplier's engagement
- **In FY25, we identified 10 high-risk alerts around sustainability issues[25] for nine active suppliers. This included labour practices alerts for three suppliers and no modern slavery alerts.**

Sustainability audit program

- Identifies suppliers for further engagement, worker voice initiatives or site audits, based on risks identified through:

Media reports	Feedback from our team or external stakeholders, such as investors or modern slavery industry groups	Supplier self-reports	Whistleblowing reports	KYS	EDD reports

- We may require suppliers to undergo additional due diligence, such as worker voice surveys or audits[26]
- We review the findings of all our worker voice surveys and audits
- We work with the supplier to develop remediation plans with agreed timeframes for any identified issues
- We verify the supplier has carried out the corrective actions
- **We did not identify any instances of modern slavery through our sustainability audit program in FY25.**

24. Our domestically-contracted suppliers represent more than 80 per cent of our total spend.
25. Sustainability issues relate to health and safety, labour practices, environmental practices, bribery and corruption and modern slavery.
26. For more information on our FY25 worker voice surveys and audits, see the Worker voice surveys, FY25 worker voice surveys and Independent site audits sections of this report.

Specific risk mitigation approaches

We recognise that some of our main modern slavery risks have unique challenges or otherwise require particular focus and so we follow different processes to those set out above.

Risk	Our reasons to focus	Our approach
Carbon credits	• We purchase carbon credits through third parties from existing projects • We have limited influence over how projects are operated • Our influence is via our decision to proceed to buy the credits after conducting due diligence • In FY25, we purchased a very small volume of Australian Carbon Credit Units and no further international carbon credits as we have stopped offsetting the emissions from our operations, some of our products and our brands[27] • For more information on the modern slavery risk profile of this area, see the Our modern slavery risks section of this report.	• Our Carbon Offset Acquisition Guideline supports investment in high integrity credits • Our review includes whether the project is aligned to Telstra's sustainability strategy, sustainability commitments and policies • We check projects have third-party verification, including commentary on local environmental and social impacts • Our due diligence includes country risk assessments and database searches for litigation and adverse media specific to the involved parties • We don't proceed with the acquisition if any material concerns are uncovered in this due diligence.
Renewable energy projects	• Telstra has made a commitment to enable renewable energy generation equivalent to 100 per cent of its consumption by 2025 • As part of this commitment, we enter into long term power purchase agreements with new renewable energy projects • For more information on the modern slavery risk profile of this area, see the Our modern slavery risks section of this report.	• We use a supplier questionnaire covering modern slavery risks • We review relevant supplier policies, ask specific questions on modern slavery risk management at the request for proposal stage and assess responses • We include clauses in our power purchase agreements that require compliance with the Supplier Code of Conduct and other relevant Group Policies • Our contract management team regularly assesses ethical business risks through the course of the contract • We don't proceed with the project if we consider a supplier is not adequately managing modern slavery risks.
Solar panels	• Solar panels form part of our mobile equipment installations and network upgrades across Australia and the wider region • Tier 1 suppliers in Australia source their solar panels overseas • Historical challenges when seeking to audit solar panel manufacturers beyond tier 1 • Lack of transparency in the industry • For more information on the modern slavery risk profile of this area, see the Our modern slavery risks section of this report.	• Additional controls are in place to assess suppliers • We cross-reference potential suppliers against previous Joint Alliance for Corporate Social Responsibility (JAC) audits • We check for past allegations of worker exploitation • We engage with tier 1 suppliers early in the procurement process and ask for detail on how they manage modern slavery risks • Our teams follow internal guidance on how to raise modern slavery concerns with suppliers and how to identify known risks.

Image credit: Squadron Energy and Murra Warra Wind Farm 1

27. For information on our use of carbon credits, see our 2025 Bigger Picture Sustainability Report on our website.

Human rights investigations and remediation protocol

In FY25, we developed a human rights investigations and remediation protocol for use by our teams. The protocol guides our teams on how to respond in line with the UNGPs and our Human Rights Policy when we identify a potential labour rights issue in our supply chains. This includes:

- how to investigate a potential issue
- the governance processes that apply when we identify and work to remediate an issue
- guidance on appropriate remediation measures, which vary depending on whether Telstra caused, contributed to or was directly linked to the issue in line with the UNGPs' continuum of involvement
- how to use leverage to change supplier business practices to try to prevent future issues
- the importance of protecting, consulting with and communicating with affected individuals.

We recognise the importance of listening to the voices of survivors. We sought feedback on the protocol from an independent third party that incorporates advice from survivors. In FY26 we will update the protocol as appropriate to take this feedback into account.

Worker voice surveys

Telstra uses worker voice surveys to obtain feedback directly from workers on whether their working conditions meet the requirements in our Supplier Code of Conduct. Questions can cover:

Grievance mechanisms

Environment, health and safety

Harassment and bullying

Wages and working hours

Workplace gender equality

Job satisfaction

Workers answer questions anonymously and confidentially in response to an online survey provided and managed by a third party. We ask the relevant supplier to promote the survey to its workers ahead of time.

The survey offers insights on topics that can otherwise be difficult to identify, such as harassment, and can cover a much wider sample size of respondents than audits. We use it both independently and to complement site audits. For example, it allows us to get feedback directly from workers after a supplier completes a corrective action plan, so we can assess if an issue was effectively resolved.

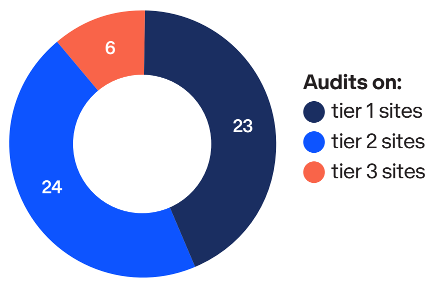
FY25 worker voice surveys

In FY25, we conducted worker voice surveys at two sites of a supplier located in Australia. The surveys had a 78 per cent overall response rate. For more information on these surveys, see the Ensuring fair treatment of agency workers section of this report.

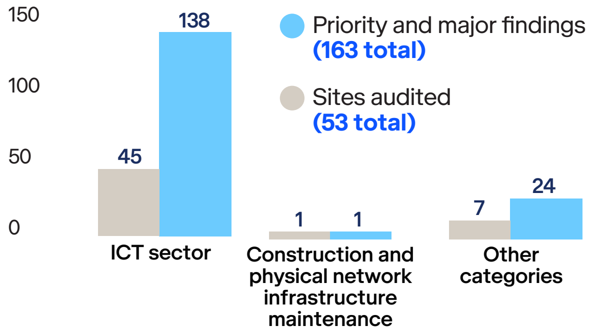
Independent site audits

Telstra engages independent auditors to conduct site audits aligned with industry standards. The audits focus on health and safety, environment, human rights, including labour rights and modern slavery, and business ethics. The audits include worker interviews, site visits to assess labour conditions and documentation reviews.

In FY25, 53 sites across 21 suppliers were audited using the JAC guidelines. Telstra led 11 site audits and JAC peers led the remaining 42 audits.[28]



Number of priority and major findings by category in FY25[29]

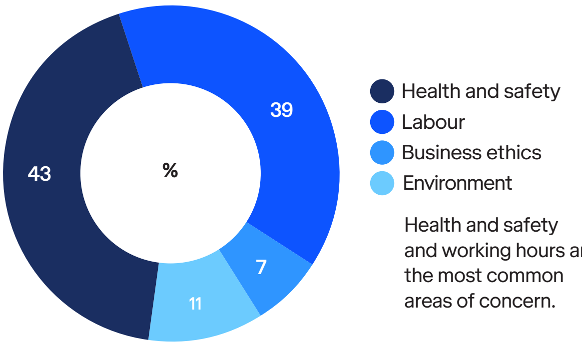


28. Telstra reports the number of audits conducted by Telstra and JAC peers under the JAC guidelines on suppliers relevant to Telstra. The disclosed metric is derived from audits reported by JAC. From this we extract the subset which relate to Telstra suppliers conducted during this financial year. In FY25, there were no supplier led audits.
29. For a description of the categories, see the Glossary of this report. Audits identify 3 tiers of findings: priority which is the most serious, followed by major and lastly minor.

Number of priority and major findings[30] by location in FY25

Sites audited (**53 total**) Priority and major findings (**163 total**)

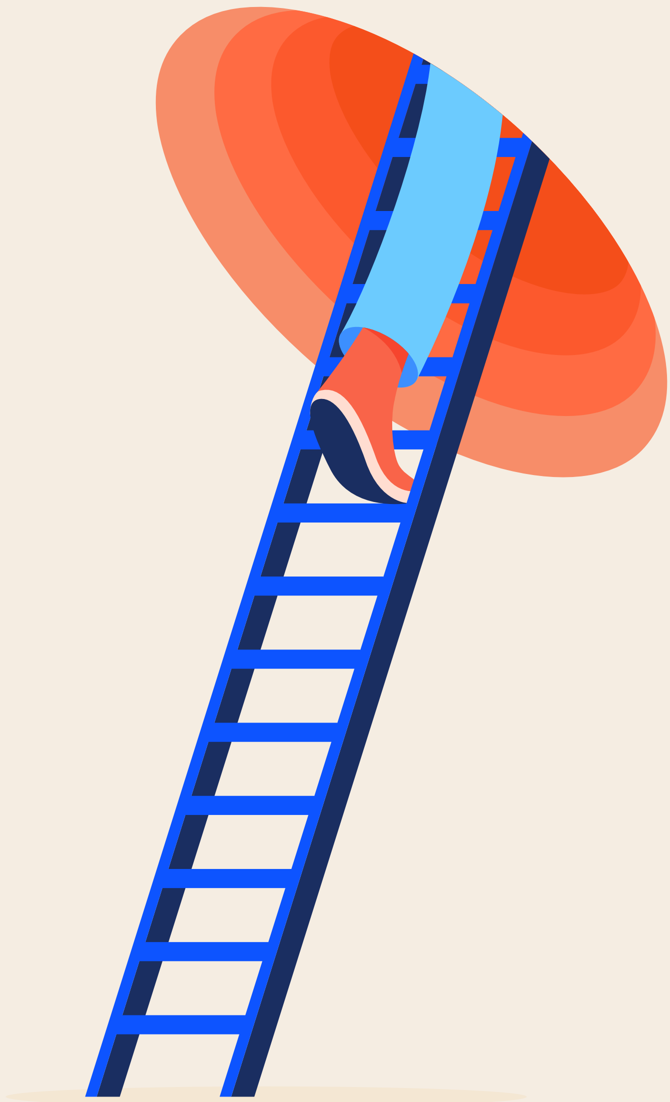
Percentage of priority and major findings by type in FY25:



Health and safety and working hours are the most common areas of concern.

In FY25 we closed 204 corrective actions relating to priority and major findings identified in this or previous years' audits

This included **closing 106, or 65 per cent, of corrective actions** relating to priority and major findings identified in FY25's audits



Internal audits

Our Quality, Health, Safety, Wellbeing and Environmental auditors undertake internal assurance on our construction and physical network infrastructure maintenance suppliers. This includes contract management system audits and onsite health, safety and environment inspections.

In FY25, we undertook **nine management system audits** and **3,755 health, safety and environment inspections**.

30. Audits identify 3 tiers of findings: priority which is the most serious, followed by major and lastly minor.

Improving labour practices in our promotional products supply chain

Last year we reported that we undertook a site audit on Telstra's primary promotional products supplier. This audit underscored the inherent risks associated with the promotional products industry.[31] To address these risks and perform additional due diligence, we continued to work with the supplier and have successfully closed **98 per cent** of the findings to date.

Following this audit and recognising the promotional products industry as a high-risk area, we took a proactive approach in FY25 by auditing another major promotional products supplier. This audit was conducted by an independent third-party auditor and focused on three tier 2 facilities located in Asia. Both our tier 1 supplier and the tier 2 facilities were cooperative during the audit process.

The audit revealed findings in the categories of health and safety, labour practices and environment. Health and safety findings included:

- the absence of an insurance policy and health examinations for workers
- unsafe work practices, such as workers not wearing provided personal protective equipment.

The labour practices issues included inadequate social insurance for workers and excessive overtime.

In response to these findings, each facility agreed to a corrective action plan which outlined specific measures and target completion dates to resolve identified issues. These included implementing safety training, revising their policies and updating overtime practices.

As at 30 June 2025, progress has been made in closing 29 per cent of priority and major corrective actions, which equate to **22 per cent** of the total corrective actions identified during the audit.

Telstra's ongoing monitoring includes:

- continuous engagement with our tier 1 supplier to track progress and close out outstanding findings
- engaging the independent auditing firm to review artefacts.

We intend to conduct follow-up audits if required.

The audits have reinforced Telstra's commitment to fostering responsible and ethical supply chains.

Protecting field services workers in our supply chains

In FY24 and FY25, Telstra conducted audits on two of our field service providers in Australia. These audits were carried out by an independent third-party auditor. Our tier 1 suppliers and their subcontractors were cooperative through the process.

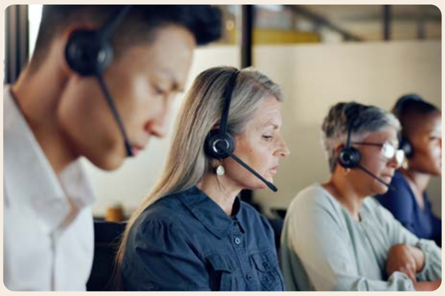
The audit findings were similar for both providers and included issues relating to labour practices and discrimination (including excessive working hours and consecutive days worked without rest). The audit highlighted opportunities to help ensure that our field services providers adhere to human rights and labour standards.

The providers agreed to corrective action plans. Required actions included reducing excessive overtime, implementing time management to allow rest days and establishing systems to help ensure equal standards for both direct and outsourced workers.

In FY25, we resolved all the labour practices findings which account for:

- 75 per cent of the total findings across both providers
- all findings for one provider
- 50 per cent of the findings for the second provider.

After year end, Telstra worked closely with the second provider to track progress and address the outstanding findings. The second provider closed the remaining findings in the first quarter of FY26.



Update on our previous audit case studies

In FY24, Telstra conducted an audit on one of our tier 1 contact centre outsourcing services providers. In FY25, we remained actively involved in resolving and closing outstanding findings. Ninety-five per cent of these findings have been addressed. Telstra remains committed to maintaining a strong relationship with this supplier, recognising their overall healthy ESG performance. We continue to work collaboratively with suppliers who are willing to engage with us on these matters, helping ensure the improvement and safeguarding of working conditions for our supply chain workers.

31. For more information, see the Our modern slavery risks section of this report.

Our training

We have several mandatory training courses in place so our people can help us prevent modern slavery in our operations and supply chains.

Training	Description	FY25 completion rate (% of target audience)
Business Essentials Training	• Mandatory for all employees and directors and for most ofour contractors, consultants and partners • Required for all new starters at Telstra and by all employees annually on a refresher basis • Covers key obligations under our Code and Group Policies including Telstra's Human Rights Policy • Includes a human rights module covering human rights and modern slavery risks relevant to Telstra.	98.3%
Supplier Governance Framework Training	• Mandatory for all staff who are contract owners or supplier relationship managers, our Procurement team and Risk team • Raises awareness of our policy requirements impacting supplier management, including our Supplier Code of Conduct • Explains staff responsibilities and resources available to manage suppliers across the Supplier Risk Categories, including labour practices.	99.6%
Addressing Modern Slavery Training	• Mandatory for our procurement team and those that make labour hire decisions or deal with high-risk areas • Helps our people understand how to identify and report potential modern slavery • Targeted roles undergo training on starting at Telstra and then every two years.	100%
Procurement Principles Training	• Mandatory for all procurement specialists • Helps procurement specialists understand their responsibilities when undertaking procurement activities to manage risks and support our social commitments • Guides our people how to comply with our Dealing with Suppliers and Other Third Parties Policy.	100%

Grievance mechanisms

Affected individuals and others can raise concerns with us directly using our grievance mechanisms. Telstra supports a culture where everyone has a voice, can contribute and can speak up if they see something that is not right. This helps us identify, investigate and remediate issues in line with our Human Rights Policy and the UNGPs.

Internal procedures

Employees can raise concerns with their one-up manager or via our 'AskUs' tool. Our intranet includes information on how to report concerns.

Concerns are recorded securely. Subject matter experts and operational management assess them with support from the Chief Risk Office where required. Where possible, we keep relevant employees informed of the outcome and what we are going to do differently.

We investigate issues relating to modern slavery in consultation with representatives from Telstra's Sustainability team, Procurement team, Legal team and other key stakeholders.

Whistleblowing

We have a confidential Whistleblowing Service where people can report concerns anonymously via phone or webform. The service is supported by our Whistleblowing Policy. Professional investigators and case managers investigate eligible reports. Telstra's Whistleblowing Committee, chaired by the Group Company Secretary, receives whistleblowing disclosures, oversees investigations and reports to the People & Remuneration Committee of the Board.

We received **217 whistleblowing reports** in FY25. Of these, allegations in 48 reports were substantiated in whole or in part. **None substantiated an instance of modern slavery.**

For more information on our whistleblowing process, see our **2025 Bigger Picture Sustainability Report** on our website.

To report a matter, please visit Telstra's Whistleblowing Service.

Grievance mechanisms in our supply chains

We recognise the challenges in raising awareness of Telstra's Whistleblowing Service to workers across our supply chains. We expect and check our suppliers have their own effective grievance mechanisms:

- **Supplier Code of Conduct:** requires suppliers to provide their workers with grievance mechanisms that are accessible, culturally appropriate and communicated in a language that workers understand
- **site audits:** verify that grievance mechanisms are available and are communicated to workers
- **worker voice surveys:** help us assess how comfortable workers feel about using available grievance mechanisms.

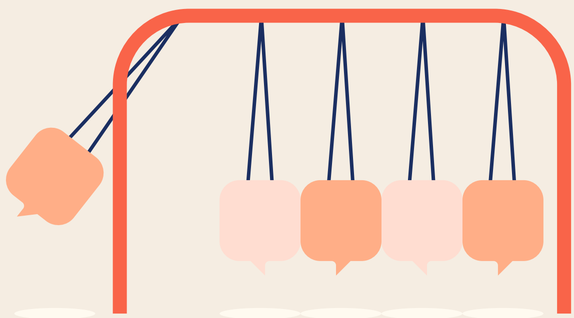
Supporting our suppliers

In FY25, we developed a guide to help our suppliers better understand and implement effective grievance mechanisms. Our Supplier Code of Conduct requires our suppliers to provide workers, their suppliers and the broader community with a confidential way to report violations of our Supplier Code of Conduct, including modern slavery and labour practices issues. The guide explains what grievance mechanisms are, how to set them up, how to protect complainants, how to measure effectiveness and how to remediate a human rights harm, including a modern slavery incident, if one is identified.

Industry cooperation on combatting modern slavery

We work with various organisations as members to combat modern slavery and drive improvements in industry sustainability practices, including in relation to modern slavery risks. In FY25, this included:

- JAC, including having one JAC board appointment and collaborating via its working groups
- Global System for Mobile Communications Association
- Telco Together Foundation (TTF), including contributing to TTF's supplier handbook Pathway to Respecting Human Rights and Addressing Modern Slavery Risks, developed in partnership with Edge Impact
- UN Global Compact Network Australia Modern Slavery Community of Practice, including collaborating via its working groups.



How we check the effectiveness of our actions

We assess the effectiveness of our actions across seven components that we consider key to an effective response.

Key component	How we assess this component
Coordinated internal response	• Monitoring the progress of our response to modern slavery through our reporting to the Risk & Sustainability Committee of the Board • Reporting material worker exploitation-related compliance breaches to the Risk & Sustainability Committee of the Board • Consulting with entities and business units across the Telstra Group as part of the preparation of this statement to identify any gaps in coordination, communication and response across our corporate group.
Clear and embedded policies	• Regularly reviewing policies to assess their ongoing relevance and applicability. These reviews consider identified breaches or investigations of misconduct.
Auditing our suppliers and their supply chains	• Auditing selected suppliers to assess their implementation of our Supplier Code of Conduct • Working collaboratively with our suppliers to adequately progress, address and close audit findings outlined in corrective action plans.
Training for our people	• Regularly reviewing the target training audience • Monitoring training completion rates to understand awareness levels across the Telstra Group • Considering feedback from the target training audience and updating the training where required.
Robust risk assessment and supplier engagement processes	• Regularly reviewing our Supplier Code of Conduct and Supplier Governance Framework to confirm they effectively mitigate modern slavery risks in our supply chains • Monitoring supplier issues including those identified during site audits • Monitoring metrics around each step of the due diligence process, including the number of suppliers monitored in our EDD program, onboarded via our KYS platform, identified for further due diligence via the sustainability audit program and audited • Tracking site audit findings and resolutions, score rating of audits, corrective action plan progress and timing.
Trusted and accessible grievance mechanisms	• Tracking the number and types of reports received through our Whistleblowing Service and HR grievance mechanism and identifying any trends • Tracking the number of investigations and substantiated claims from whistleblowing reports and HR grievance mechanisms • Checking supplier grievance mechanisms as part of site audits and worker voice surveys.
Focus on continuous improvement	• Reviewing expert third-party analysis of statements to assist us to benchmark and improve our modern slavery response • Seeking feedback from relevant independent third-party experts • Identifying good practice trends through our participation in industry groups.

How we consult within our group

Consultation with existing entities

We prioritise Telstra Group owned or controlled entities for engagement on modern slavery risks based on:

- Are they reporting entities?
- Are they integrated with Telstra's systems?
- Do they have employees?
- Do they have high risk operations or supply chains?

The consultation process may include:

- meetings with key persons to support a modern slavery risk assessment
- providing guidance on risk level and possible actions to mitigate identified risks
- supporting modern slavery risk mitigation efforts.

Each year we:

- inform directors of all entities within the Telstra Group about Telstra's responsibilities under the modern slavery legislation and our reporting process
- invite questions and feedback on our modern slavery reporting process.

Management of Telstra Group entities also review and approve relevant sections of this statement.

New acquisitions

We consider modern slavery risks when we make significant acquisitions. We assess modern slavery risks before we make an offer and, where appropriate, undertake confirmatory diligence and put in place uplift measures after we acquire an entity. This process may include the steps set out in the Consultation with existing entities section of this report. Newly acquired entities may also adopt our Group Policies and processes in accordance with the Telstra Group Policy Governance Framework and Group Governance Operating Model. After acquisition, we work with the entity to support a more detailed modern slavery risk assessment and support any risk mitigation efforts.

Telstra International

We assisted Telstra International to undertake a modern slavery risk assessment in FY25. Telstra International is fully integrated into the Telstra Group and its overall modern slavery risk areas fall into the same categories. Telstra International recognises that it has people and infrastructure located in high and medium-risk jurisdictions. Telstra International performs a yearly assessment of the jurisdictions in which it operates to consider its country risks, which includes modern slavery risks.

The FY25 modern slavery risk assessment considered the risks within the jurisdictions where Telstra International operates based on the Walk Free Global Slavery Index and mapped this against the Telstra Group's identified modern slavery risks.

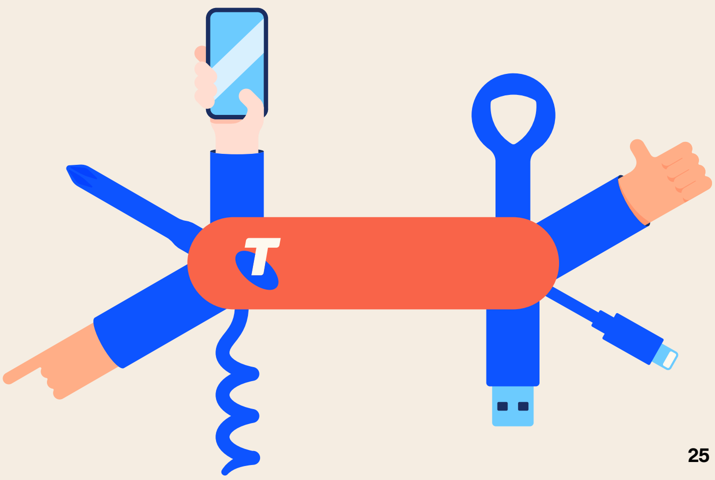
Telstra International identified the following as its higher-risk areas:

- network facilities operated by, housed at, or managed by third parties
- cleaning and security services provided to third-party data centres and offices
- subsea cable landing stations.

Telstra International put in place a staged risk mitigation plan, prioritising higher-risk jurisdictions. It committed to doing confirmatory diligence in FY26 to verify its supplier governance processes are being appropriately followed. This will involve spot checks of risk assessments for higher-risk suppliers located across identified higher-risk jurisdictions.

Boost Mobile

In FY25, we acquired Boost Mobile. Boost Mobile is a sub-brand under which Telstra markets and sells pre-paid mobile services. We undertook confirmatory diligence on Boost Mobile's modern slavery risks after acquisition. This confirmed our expectation that Boost Mobile has a similar level of modern slavery risk in its operations and supply chains as the broader Telstra Group. Boost Mobile will be fully integrated into the Telstra Group. Its suppliers are being onboarded onto Telstra's systems and once onboarded, will be subject to the processes described in the Our processes to manage supplier risk section of this report.



fetch Fetch TV

Last year we reported that we worked with Fetch TV to understand and uplift its modern slavery risk response after acquiring a 51 per cent controlling interest in FY23. In FY25, we continued to consult with Fetch TV to support its uplift efforts, including against its FY25 commitments.

✔ Completed ● In progress ● Not achieved

FY25 commitment		Progress
Finalise the implementation of a supplier code of conduct aligned with Telstra's Supplier Code of Conduct	Completed	Fetch TV provides the Supplier Code of Conduct to new suppliers or when recontracting with existing suppliers. Fetch TV's standard supply agreement requires suppliers to comply with the Supplier Code of Conduct.
Roll out the new supplier questionnaire to new suppliers and to existing suppliers at the point in time at which new terms and conditions of agreement are entered into with questions relating to modern slavery risk, and embed it in its supplier onboarding processes[32]	In progress	Fetch TV did not progress the roll out of its supplier questionnaire in FY25. It will start rolling out the questionnaire in FY26, initially targeting its new and existing higher-risk suppliers such as its set top box manufacturers. It has embedded the questionnaire into its onboarding process and created a process document for its team to help ensure Fetch TV sends out and reviews the questionnaire and follows up unsatisfactory responses with the supplier.
Provide annual refresher training to identified relevant employees on modern slavery and help ensure that new employees are trained	Completed	Fetch TV ran the annual refresher training with a 100 per cent completion rate.
Ensure all agreements issued by Fetch TV contain provisions addressing modern slavery risk, and on a case-by-case basis, contracts include terms providing for site visits and audits	Completed	All new agreements issued by Fetch TV in FY25 had clauses addressing modern slavery risks. Where applicable the contracts with suppliers in higher-risk industries or higher-risk jurisdictions contain provisions that permit site visits/audits. In FY25, such suppliers were Fetch TV's set top box manufacturers.
Work with Telstra to source the full version of the JAC audit of its set top box manufacturer to satisfy itself that the supplier has no corrective action plans outstanding	Completed	Fetch TV reviewed the audit and worked with Telstra to confirm with JAC that no corrective actions are outstanding.
Implement a process to report compliance breaches to the applicable management representative, track any incidences of modern slavery concerns and formally consult with other entities in the Telstra Group on modern slavery risk.	Completed	Fetch TV updated its Modern Slavery Policy to include requirements for how it reports and escalates breaches. Team members must report concerns to Fetch TV's General Counsel, who reports to the Fetch TV CEO and the Fetch TV Board. Fetch TV then works with Telstra to close out the issue or concern.

In addition, Fetch TV:

- continued to adopt or align its policies with the Telstra Group Policies
- further engaged with its main set top box manufacturer (a higher-risk area in its supply chains) to satisfy itself of its modern slavery risks by performing a site visit. Fetch TV did not identify any issues during the site visit.

In FY26, Fetch TV will continue its uplift efforts by:

- providing training on supplier on-boarding processes, including modern slavery considerations, to relevant staff members
- expanding the target training audience for modern slavery training and rolling it out to all employees
- carrying out a site visit for Fetch TV's main set top box manufacturer
- developing a guidance document for its teams on how to review responses to Fetch TV's supplier questionnaire
- starting the roll out of its supplier questionnaire to new and existing higher-risk suppliers such as its set top box manufacturers
- putting in place a formal process to measure the effectiveness of the supplier questionnaire and track its use.

32. In FY24, Fetch TV incorrectly reported that it finalised the form of its modern slavery questionnaire and would roll it out in FY25. Fetch TV progressed development of this questionnaire over FY24 and finalised it in FY25.

Differences in the Telstra Group

Certain Reporting Entities and owned or controlled entities in the Telstra Group are not fully integrated and have taken different actions to assess and address modern slavery risks. For how we address differences in our owned or controlled entities, see the Consultation with existing entities section in this report. Details of the key differences in the approach of the Reporting Entities are set out below.

Telstra Health

Who Telstra Health is

- Leading provider of digital health solutions, including clinical and administrative systems, health data analytics, population health solutions, cost management software solutions designed for hospitals and healthcare providers and information exchange platforms. It develops and supplies practice and clinic management software solutions and publishes AusDI, an Australian medical information database
- Works with care providers in the hospital, health service, pharmacy and aged and disability care sectors to connect health information, clinicians and consumers
- Has a direct workforce of approximately 1,400 people across Australia, the United Kingdom (UK), Canada and the Kingdom of Saudi Arabia, outsourced IT development labour arrangements in India, Vietnam and Ukraine and outsourced business support labour arrangements in the Philippines
- Has approximately 500 active suppliers located in 22 countries
- Main categories of spend are contracted workers (mostly software developers, engineers and data analysts), an Australian-based contact centre, ICT hardware and spend related to its offices.

Telstra Health's modern slavery risks

- In FY22, Telstra Health undertook a risk assessment of its operations and supply chains
- Telstra Health identified the procurement of medical devices as an emerging area of risk. Since FY22, Telstra Health's business has moved away from the support of medical device hardware and Telstra Health has updated its risk assessment and removed medical equipment as a risk area. Additionally, higher-risk areas include the international operations, especially in the Middle East, of its owned or controlled entities and its offshore labour forces, including those provided by its managed service partners. Otherwise, its risk areas are consistent with the Telstra Group
- Telstra Health has prioritised its outsourced labour arrangements as a focus for further due diligence, especially its operations in India which have seen a significant increase in FY25 because of a managed partnership agreement for information technology development and management resources. For more information on the modern slavery risk profile of this area, see the Telstra Health's FY26 commitments section of this report.

How Telstra Health addresses modern slavery risks

- **Internal policies:** Telstra Health has adopted some of the Telstra Group Policies including the Code, Human Rights Policy, Supplier Code of Conduct and Whistleblowing Policy. Telstra Health does not use the Telstra Group procurement function or centralised procurement processes however it leverages some Telstra suppliers and contracts for purchases
- **Vendor onboarding:** Telstra Health conducts due diligence on all its suppliers including requiring each new supplier to complete a questionnaire covering its approach to and mitigations against modern slavery risks. In FY25, Telstra Health took steps to strengthen its internal procurement capabilities including a more centralised, process-driven approach to vendor selection and management with greater emphasis on vendor onboarding checks such as modern slavery assessments
- **Audit:** In FY23, Telstra audited one of Telstra Health's two marketing merchandise suppliers as part of a broader Telstra Group-wide audit. In FY24, Telstra Health reviewed the results of the completed supplier audit. In FY25, Telstra Health worked with Telstra to help rectify issues that were identified
- **Subsidiary uplift:** The Telstra Health Legal and Risk teams regularly consult with all its subsidiaries on modern slavery risks to help ensure compliance with Telstra Health's expectations. In FY25, PowerHealth's operations were largely integrated with Telstra Health. A key focus for FY26 will be on PowerHealth's supply chain and employment contracts in the Middle East region to help ensure these meet Telstra's standards and expectations. For more information, see the Telstra Health's FY26 commitments section of this report
- **Supplier governance uplift:** In FY25, Telstra Health implemented a new supplier governance software solution which automates certain supplier risk management processes including use of Telstra Health's modern slavery questionnaire
- **Training:** Telstra Health employees undertake Business Essentials Training on a yearly basis and achieved a 100 per cent completion rate for FY25. Relevant employees also undertake Addressing Modern Slavery Training and achieved a 100 per cent completion rate for FY25.

How Telstra Health checks the effectiveness of its actions

- Reports any known or suspected compliance breaches to the internal Telstra Health Risk and Legal teams and to the wider Telstra Group as required
- Regularly reviews policies and incorporates supplier and Telstra feedback into its modern slavery response
- Tracks any complaints received via whistleblowing and HR mechanisms
- Telstra Health Legal and Risk teams record and track material human rights incidents should they arise
- Holds quarterly meetings between the Legal, Risk and Accounts Payable teams to monitor completion of supplier modern slavery questionnaires, check that any concerns are dealt with, and monitor process effectiveness
- Monitors completion rates for relevant training
- Actively monitors compliance with modern slavery questionnaires.

How Telstra Health consults within its group

Telstra Health's owned or controlled entities were included in the consultation processes carried out by the broader Telstra Group.

Telstra Health's progress

Completed · In progress · Not achieved

FY25 commitment		Progress
Continue to work with Telstra to influence the audited supplier to rectify the issues identified in the audit (reported in FY24)	Completed	Telstra closed out all actions arising from this audit. For more information, see the Improving labour practices in our promotional products supply chain section of this report.
Issue its new longform modern slavery questionnaire to: • suppliers of PowerHealth and MedicalDirector that it identifies as higher risk • existing marketing merchandise and medical devices suppliers • existing international suppliers	Completed	Telstra Health engaged directly with the relevant existing suppliers to issue its longform modern slavery questionnaire. Telstra Health was satisfied with the responses.
Roll out an instruction manual for Telstra Health's Procurement team to require the use of the longform modern slavery questionnaire as a default for domestic suppliers in industries identified as higher-risk (including medical devices and marketing merchandise suppliers)	Completed	Telstra Health uplifted its supplier governance processes by creating a dedicated Procurement team and implementing a formal procurement handbook to guide this team on when to use the longform modern slavery questionnaire.
Assess PowerHealth's recruitment services providers to ensure they do not engage in unacceptable recruitment practices	Not achieved	PowerHealth stopped using any recruitment providers in FY25 as it preferred to recruit via its in-house teams. Its recruitment activities are in line with Telstra Group recruitment policies and processes. As a result of this change, it decided this commitment was no longer required.
Implement Telstra Group Policies across PowerHealth's international operations	Completed	PowerHealth implemented all Telstra Group policies that Telstra Health has adopted across its internationa operations.
Put in place further governance processes in its procurement system to check the effectiveness of its modern slavery risk mitigation measures, including automated assessment of supplier questionnaires to screen for higher-risk suppliers and a quarterly review of all supplier questionnaires by the legal and risk teams.	Completed	Telstra Health implemented a supplier governance software solution in FY25. This software solution automates use of the modern slavery questionnaire, helps ensure it is sent to higher-risk suppliers and provides responses to relevant teams for assessment. It also put in place a quarterly governance process where relevant teams review and validate the initial assessment based on supplier responses to the questionnaire.

Telstra Health's FY26 commitments

In FY26, Telstra Health will:

- continue to manage its key modern slavery risks including areas of greater risk such as operations in the Middle East and detailed review of tier 2 suppliers, such as office space providers
- conduct deep dive assessments in relation to its offshore labour resource providers including its managed partner provider which has a significant labour force in India
- uplift its vendor management processes by further automating and assessing vendor onboarding requirements including fully automating assessments of compliance with its modern slavery questionnaires
- develop a vendor governance model including focus on regular modern slavery compliance reporting and assessment.

The content in relation to Telstra Health (pages 27 and 28) was approved by the CEO and Board of Telstra Health Pty Ltd.

Digicel Pacific

Who Digicel Pacific is

- Biggest mobile operator in the South Pacific region, providing mobile phone and ICT services and operating telecommunications infrastructure
- Has a direct workforce of approximately 1,800 employees across Papua New Guinea (PNG), Fiji, Nauru, Samoa, Tonga and Vanuatu
- Has approximately 1,200 active suppliers located in 41 countries
- The main categories of spend are network equipment, customer devices, bandwidth, field operations, electricity and fuel and logistics services.

Digicel Pacific's modern slavery risks

Risk areas for Digicel Pacific in its operations are:[33]

- commission-based 'feet on the streets' workers (FOTs). FOTs are engaged to promote mobile financial services and assist with customer queries, e.g., SIM registration, and activation of mobile wallets
- casual employment of child actors for voiceover media content
- workers employed by Digicel Pacific distributors and their partners and distribution channels such as wholesalers and resellers
- interns
- workers at Digicel Pacific-branded retail stores not operated by Digicel Pacific
- network and IT contingent and augmented workforce.

Risk areas for Digicel Pacific in its supply chains are:

- handsets and SIM cards
- IT workstations and accessories
- field services including construction and maintenance of network infrastructure
- office maintenance, cleaning and gym services providers
- media hardware
- construction related to the Digicel PNG Foundation
- security services
- logistics services
- construction and maintenance of retail stores/kiosks.

How Digicel Pacific addresses modern slavery risks

- **Internal policies:** Digicel Pacific has adopted relevant Telstra Group Policies. For more information, see the Our policies section of this report
- **Vendor onboarding:** In FY25, Digicel Pacific rolled out a supplier governance framework that includes guidance for its teams on its supplier governance expectations, including an internal supplier engagement management tool and requirements for continuous supplier monitoring for the suppliers comprising 80 per cent of Digicel Pacific's spend
- **Vendor onboarding:** From FY25, Digicel Pacific collects Statements of Compliance with the Supplier Code of Conduct from its vendors at the engagement stage as part of its vendor onboarding process
- **Existing vendors:** Digicel Pacific is rolling out its requirement that higher-risk suppliers sign contract variations obliging them to comply with the Supplier Code of Conduct
- **Training:** All Digicel Pacific employees complete Telstra's Business Essentials Training as part of their onboarding and are required to undertake an annual refresher on a yearly basis. All PNG employees and select target groups at its Hub business complete Telstra's Addressing Modern Slavery Training with a completion rate of 100 per cent
- **Top up payments for commission-based FOTs:** If someone is performing FOTs work for Digicel Pacific on a commission-only basis, they receive a top up in any instances where the commission-only payments would result in them receiving less than the minimum wage applicable for the time that they spend performing the FOTs work
- **Grievance mechanism:** The Telstra Whistleblowing Service is available and is used for complaints relating to Digicel Pacific
- **Protections for child actors:** Digicel Pacific works to ensure child actors are employed on a casual basis, using employment contracts in line with Australian standards for child actors, with their parents or guardians supervising the engagement
- **Investigations and audits:** When Digicel Pacific identifies a potential labour rights issue or a higher-risk supplier, it collaborates with the Telstra Group to investigate these. This can include directly engaging identified higher-risk suppliers through site visits and employee interviews, engaging an independent third party to perform a supplier audit, or working with internal Telstra Group investigations specialists to validate and rectify complaints.

How Digicel Pacific checks the effectiveness of its actions

- Monitoring completion rates for training
- Working with Telstra to track the number and areas of complaints received via whistleblowing mechanisms.

How Digicel Pacific consults within its group

Digicel Pacific's owned or controlled entities were included in the consultation processes carried out by the broader Telstra Group.

33. In FY25, Digicel Pacific reassessed and rationalised its risk categories. While Digicel Pacific's modern slavery risks remain the same as in FY24, Digicel Pacific considered that some risks that were previously categorised as operational should instead be included as supply chain risks. It also removed risks that it assessed were duplicated in other categories.

Digicel Pacific's progress

Completed · In progress · Not achieved

Prior year commitment		Progress
Develop a multi-year roadmap to adopt relevant components of the Supplier Governance Framework to manage supplier risk	Completed	Digicel Pacific developed a multi-year roadmap to adopt relevant components of Telstra's Supplier Governance Framework. For more information, see the How Digicel Pacific addresses modern slavery risks section of this report.
Conduct modern slavery training for all Digicel PNG Foundation panel contractors[34]	Completed	Digicel PNG Foundation ran multiple modern slavery training sessions for all its panel contractors and achieved a completion rate of 100 per cent.
Update all contracts with Digicel Pacific distributors and retailers to include clear expectations in relation to worker treatment by them and their partners and distribution channels and Digicel Pacific rights to monitor compliance	Completed	All contracts with distributors and retailers have been updated to incorporate the labour rights expectations in the Supplier Code of Conduct other than one distributor. This distributor is a Telstra Group supplier and is covered by Telstra's Supplier Code of Conduct.
Develop clear guidelines for internships to support fair arrangements	Completed	Digicel Pacific has developed and rolled out guidelines or policies to support fair arrangements for internships in all markets.

Digicel Pacific's FY26 commitments

In FY26, Digicel Pacific will:
• assess the feasibility of a dedicated Supplier Governance tool
• uplift its supplier onboarding processes to explicitly incorporate labour rights expectations into higher-risk contracts going forward
• develop an investigations and remediation protocol for human rights issues in the supply chain.

The content in relation to Digicel Pacific (pages 29 and 30) was approved by the PNG and Hub CEOs of Digicel Pacific and Boards of Telstra PM Holdings Pty Ltd and Telstra PM Pty Ltd.

Protecting workers in the security services sector

As we reported last year, in FY24 Digicel Pacific investigated issues that were raised about a security supplier and its compliance with our Supplier Code of Conduct. This investigation identified areas of concern and Digicel Pacific initiated a review of the supplier.

In FY25, Digicel Pacific:

- finalised its preliminary internal investigation, which highlighted the need to further investigate the areas of concern
- considered whether it caused, contributed to, or was directly linked to the areas of concern in line with the UNGPs, and took steps to ensure its actions did not contribute to any payment timing issues by the supplier
- put in place improved supplier governance processes so it can better identify and mitigate supply chain labour rights risk[35]
- took steps to foster effective dialogue and build a relationship with the supplier by performing site visits to the facilities and having informal discussions with workers. This provided Digicel Pacific with a direct line of communication with the CEO, helped it get a better understanding of the supplier's business and helped it improve its leverage with the supplier. The supplier's receptive response to visits has provided comfort that it is willing to collaborate with Digicel Pacific during the investigation and subsequently to fix issues
- has engaged a third-party independent auditor to deep dive on the labour rights of security personnel and help ensure issues are appropriately remediated.

It will use the results of the audit to get feedback on its own modern slavery risk mitigation processes and see where further improvements can be made. Digicel Pacific expects to receive the results of the audit, and determine any actions arising from it, in FY26.

34. Digicel PNG Foundation was referred to as 'Digicel Foundation' in Telstra's 2024 Modern Slavery Act Statement. The organisation's name is 'Digicel PNG Foundation'.
35. For more information, see the Digicel Pacific's FY26 commitments section of this report.

Versent

Who Versent is

- Provides cloud modernisation, data and analytics, digital experience and security and identity services with ongoing build and run offerings
- Has a direct workforce of 385 people in Australia, the UK and the USA, and an indirect workforce of 13 people in the Philippines, Australia and the UK
- Has 168 suppliers located in Australia, Singapore, the UK, the Philippines, Canada, New Zealand and the USA
- Its main categories of spend are ICT products and services including software and hardware, facilities and property management services (e.g., cleaning, office maintenance), professional services, recruitment and labour hire services, travel and hospitality services and office supplies and equipment.

Versent's modern slavery risks

In FY25, Versent updated its modern slavery risk assessment of its operations and supply chains. It found that its key risk areas are:

- recruitment and labour hire services in the Philippines
- ICT hardware, office supplies and equipment
- facilities and property management
- travel and accommodation services and travel management
- its contingent workforce in the Philippines.

How Versent addresses modern slavery risks

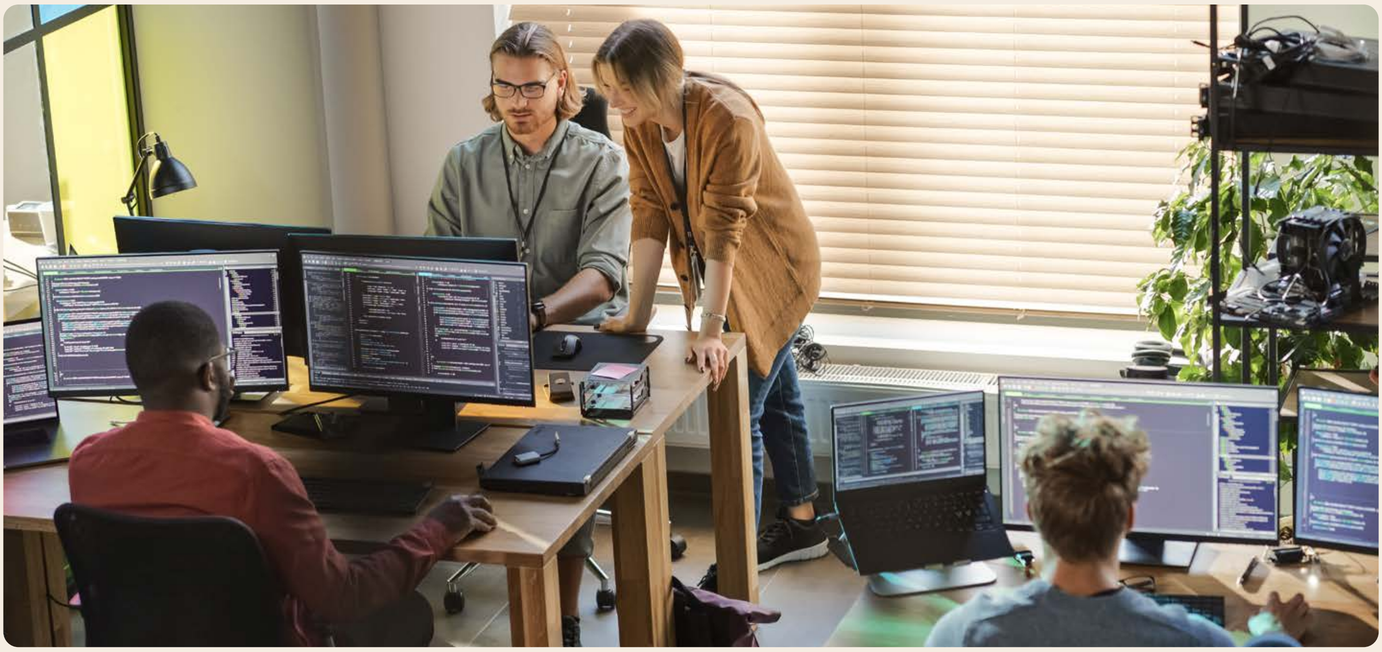
- **Internal policies:** Versent has policies in place that cover modern slavery and human rights, including adopting Telstra's Human Rights Policy, Whistleblowing Policy and the Code. In FY25, it reviewed its operations to check compliance with these policies. Versent also has policies relating to conduct, procurement and grievances in place to support its modern slavery risk mitigation measures, which are aligned to Telstra's Group Policies, including a Grievance Policy
- **Employee management:** Versent has a framework in place to check it complies with labour laws applicable to its direct employees, including by monitoring hours worked through a timesheet system in line with applicable law and annual review of employment contracts to confirm legal compliance. Versent regularly assesses its compliance with local employment laws in the jurisdictions it operates, including by engaging external advisers to assess compliance with laws outside Australia
- **Contracts:** Versent's standard supply and partner contracts have specific clauses requiring compliance with modern slavery legislation
- **Training:** All Versent employees and contractors take Telstra's Business Essentials Training with a 100 per cent completion rate
- **Supplier onboarding:** Versent sent its supplier questionnaire, which includes questions related to modern slavery, to all existing suppliers. It embedded the questionnaire into its supplier onboarding process. This process is documented and requires Versent to provide the questionnaire to all new suppliers and review and approve the responses before the supplier can be onboarded into Versent's systems. Suppliers cannot be paid until they are onboarded
- **Work with higher-risk suppliers:** Versent issued a modern slavery questionnaire to the supplier of its contingent workforce in the Philippines, which it identified as higher risk. It completed a thorough review of the submitted information and satisfied itself that the supplier had appropriate policies and processes in place to mitigate labour rights risks.

How Versent checks the effectiveness of its actions

- Reviewing and updating its policies twice a year
- Monitoring completion rates of relevant training
- In FY25, set up a tracker to monitor use of its modern slavery questionnaire and created a process to help ensure it sends follow ups for incomplete questionnaires, reviews responses and engages with the supplier if it considers there are any gaps in the supplier's response.

How Versent consults within its group

Versent's owned or controlled entities were included in the consultation processes carried out by the broader Telstra Group.



Versent's progress

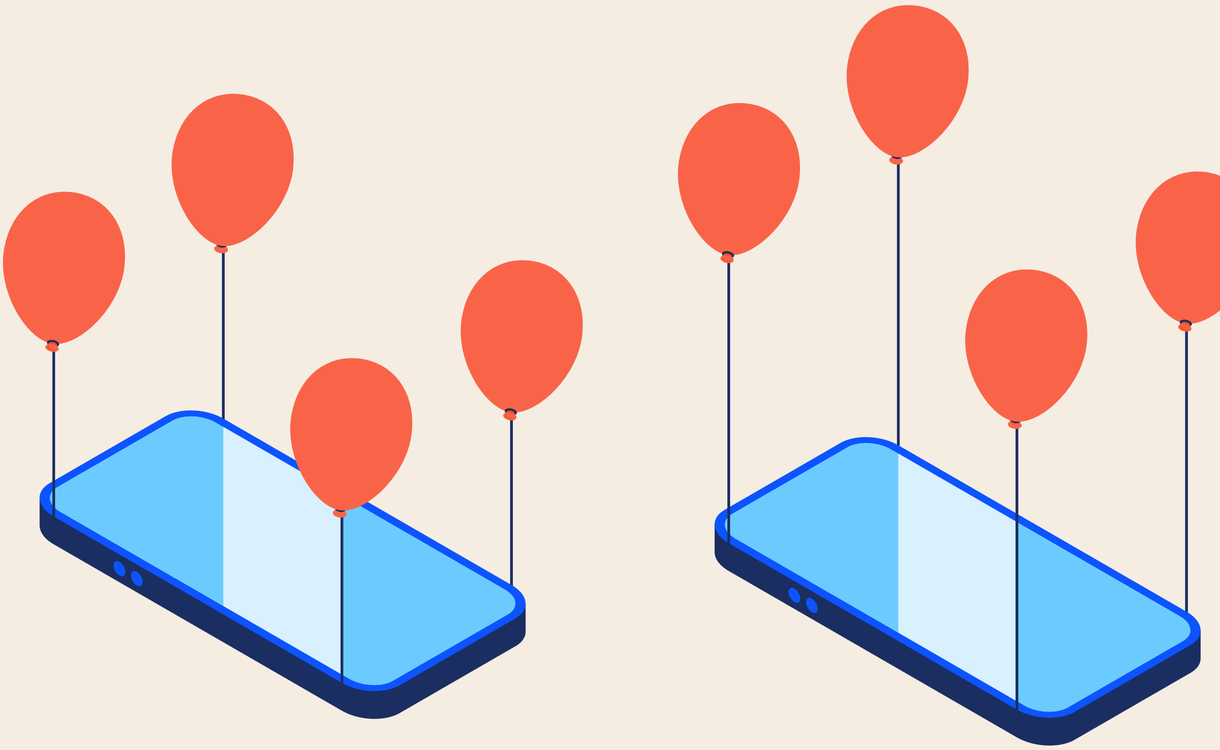
Completed · In progress · Not achieved

Prior year commitment		Progress
Undertake a more detailed risk assessment of the Versent Group to identify its specific modern slavery risks, including for its indirect workforce in the Philippines	Completed	For more information, see the Versent's modern slavery risks section of this report.
Start the process of aligning Versent's supplier processes with Telstra's Supplier Governance Framework to the extent appropriate	Not achieved	In FY24, Telstra intended to integrate Versent's supplier processes into our Supplier Governance Framework. In FY25, Telstra decided Versent should continue to use its own systems and processes. As a result, Versent decided not to proceed with this action.
Review its recruitment processes to confirm they are appropriate to protect against modern slavery	Completed	Versent finalised its review of its recruitment processes to confirm they are appropriate to protect against modern slavery. In response to this review, it embedded a remuneration framework which applies to, and governs, minimum labour hire wages.
Roll out Telstra's Business Essentials Training to all staff and track completion rates	Completed	Business Essentials Training was rolled out to all staff with a 100 per cent completion rate.
Implement a targeted supplier/partner questionnaire covering modern slavery risks	Completed	For more information, see the How Versent addresses modern slavery risks section of this report.
Identify and implement appropriate processes to measure the effectiveness of Versent's modern slavery risk mitigation measures	Completed	Versent undertook a review of its existing processes to understand how it can use them to measure the effectiveness of its modern slavery risk mitigation measures. It also set up a process to track the use of, and effectiveness of, its supplier questionnaire.

Versent's FY26 commitments

In FY26, Versent will:
• set up a confidential grievance mechanism for use by its workers, its suppliers and third parties to report labour rights or other concerns
• perform additional diligence on Versent's facilities and property management suppliers and travel, accommodation services and event management services suppliers, including review of responses to its supplier questionnaire
• issue Versent's modern slavery questionnaire to its labour hire suppliers and work with them to remediate any issues identified in this process.

The content in relation to Versent (pages 31 and 32) was approved by the CEO and Board of Versent.



Our progress

Telstra Group FY25 commitments

Completed · In progress · Not achieved

Commitment		Progress
Review and update our information sources for our ongoing monitoring program, including those related to labour rights	Completed	We ran an assessment of potential information sources for our ongoing monitoring program and we selected new providers. For more information, see the Continuous improvement of supplier governance across Telstra secion of this report.
Implement improved governance for tracking risk mitigation actions identified through our KYS platform and ongoing monitoring	Completed	We implemented a new risk assessment and KYS platform which allows improved governance for tracking risk mitigation. For more information, see the Continuous improvement of supplier governance across Telstra secion of this report.
Revise our supplier inherent and residual risk scoring to incorporate updated methodologies	Completed	We revised our risk scoring methodology for inherent and residual supplier risk and implemented it into our risk assessment system. For more information, see the Continuous improvement of supplier governance across Telstra secion of this report.
Uplift our Supplier Governance Framework Training to better support contract owners in assessing and managing risks	Completed	The training for the Supplier Governance Framework has been completely redesigned in line with the FY24 Supplier Governance Framework and was deployed during FY25. For more information, see the Our training section of this report.
Develop human rights questions for use in tender processes	Completed	We arranged an independent review of our standard KYS questions, which are used in our tender process, from a modern slavery and human rights perspective. We added new questions to cover any identified gaps and implemented the updates into our risk assessment system. For more information, see the Continuous improvement of supplier governance across Telstra secion of this report.
Develop supplier guidance to assist suppliers to understand and implement the labour and human rights expectations set out in the Supplier Code of Conduct	Completed	We developed a guide for suppliers explaining human rights concepts and providing practical actions they can take to help them comply with our labour rights expectations in our Supplier Code of Conduct. For more information, see the Uplifting our Supplier Code of Conduct section of this report.
Develop supplier guidance on effective grievance mechanisms	Completed	We developed a guidance document to help our suppliers implement an effective grievance mechanism as required by our Supplier Code of Conduct. For more information, see the Supporting our suppliers section of this report.
Develop an investigations and remediation protocol for human rights issues in the supply chain	Completed	We implemented a guide for our team on how to investigate and remediate a human rights issue in line with the UNGPs and our Human Rights Policy when we identify a potential labour rights issue in our supply chains. For more information, see the Human rights investigations and remediation protocol section of this report.

Telstra Group FY26 commitments

In FY26, Telstra will:
• monitor and manage adoption of our uplifted supplier governance technology system and associated processes
• conduct analysis to identify potential new or emerging human rights risk areas in our supply chains
• further embed human rights, including modern slavery, guidance materials and set up processes to monitor their effectiveness
• uplift sustainability risk strategy, including human rights and modern slavery, and align it with existing risk processes
• create internal overarching resource on human rights, including modern slavery, for use by teams.

Appendix 1: Reporting Entities

Reporting Entity	Description
Australian Act reporting entities	
Amplitel	Main business involves providing telecommunication infrastructure assets for its customers to deliver telecommunications services across Australia. This includes building, upgrading, operating, inspecting and maintaining telecommunication infrastructure and providing access for the customers to co-locate their equipment on Amplitel's infrastructure
Amplitel HoldCo	The holding company of Telstra's investment in Amplitel
Telstra InfraCo	Owns and operates Telstra's passive infrastructure asset business (excluding towers)
Telstra International	Owns and operates Telstra's business of providing international services using the international assets, which includes Digicel Pacific
Telstra Health	Main operating entity in the Telstra Health Group. Primary operations are the development and provision of software solutions to governments, hospitals and health and aged care providers as well as operation of the National Cancer Screening Register and 1800RESPECT services for the Australian Government
Telstra Holdings	Holding company of many of Telstra International's subsidiary companies
Telstra Limited	Owns and operates Telstra's business including Telstra's retail, wholesale, Health, Energy and Purple businesses, excluding the businesses of Telstra InfraCo, Telstra International and Amplitel. Telstra Limited also owns and operates the active parts of the Telstra Group's infrastructure network
Telstra Pay TV	Holds the broadcasting licence which enables Telstra to sell pay TV services
Telstra PM Holdings and **Telstra PM**	Interposed holding entities for Digicel Pacific. Digicel Pacific is a provider of mobile phone and ICT services (including TV, home and business internet solutions) and operates telecommunications infrastructure across six markets in the South Pacific region
Telstra Purple	Provides technology services focused on outcome-based, transformative technology solutions
TGL	The ultimate parent company of the Telstra Group whose shares are publicly traded on the ASX
Versent	Leading technology consultancy specialising in cloud modernisation, data and analytics, digital experience and security and identity services with ongoing build and run offerings
UK Act reporting entity	
Telstra UK	Provider of telecommunication services in the UK, Europe, the Middle East and Africa
Canadian Act reporting entity	
Telstra Incorporated	Main operating entity in the Americas, selling international connectivity services to large multinational enterprises and carriers located in the Americas by using the international assets

Appendix 2: Legislative criteria

The table below identifies where in this statement we have addressed each mandatory criteria under the Australian Act and Canadian Act and each recommended criteria under the UK Act.

Australian Act – mandatory criteria	UK Act – recommended criteria	Canadian Act – mandatory criteria	Reference in this statement
Identify the reporting entity		Entity's identifying information: • reporting entity's legal name • financial reporting year • identification of reporting obligations in other jurisdictions • entity categorisation according to the Canadian Act • sector/industry • location	Pages 1, 3, 4, 34, 38
Describe the structure, operations and supply chain of the reporting entity	Organisation's structure, its business and its supply chains	Entity's structure, activities and supply chains	Pages 4-6, 25-32, 34, 38
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities that the reporting entity owns or controls	The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place	Parts of the entity's business and supply chains that carry a risk of forced labour or child labour	Pages 3, 5, 10-11, 25-32
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	• Policies in relation to slavery and human trafficking, due diligence processes in relation to slavery and human trafficking in its business and supply chains • Steps taken to assess and manage the risk of slavery and human trafficking • Training on slavery and human trafficking available to its staff	• Policies and due diligence processes in relation to forced labour and child labour • Steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity • Steps the entity has taken to assess and manage the risk of forced labour or child labour being used in the specific parts of its business and supply chains that carry such a risk • Any measures taken to remediate any forced labour or child labour • Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in the entity's activities and supply chains • The training provided to employees on forced labour and child labour	Pages 2, 7-23, 25-33
Describe how the reporting entity assesses the effectiveness of such actions	The organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Pages 14, 24, 27-32
Describe the process of consultation with any entities that the reporting entity owns or controls			Pages 25-32
Any other information that the reporting entity considers relevant			Pages 2, 3, 33
Details of approval and signature	Details of approval and signature	Details of approval, attestation and signature	Pages 3, 28, 30, 32

Appendix 3: Glossary

Term	Meaning
Addressing Modern Slavery Training	Telstra's training on modern slavery risks in Telstra's value chain and how to take action to address it. For more information, see the Our training section of this report.
Amplitel	Towers Business Operating Trust ABN 75 357 171 746. Its trustee is Amplitel Pty Ltd ABN 15 648 133 073.
Amplitel HoldCo	TowerCo No. 2 Pty Ltd ABN 53 648 133 297
Australian Act	Modern Slavery Act 2018 (Cth)
Boost Mobile	Boost Tel Pty Limited ABN 19 092 384 417 and its owned or controlled entities
Business Essentials Training	Mandatory annual training which covers the Code and includes a human rights module which covers modern slavery risk mitigation. For more information, see the Our training section of this report.
Canadian Act	Fighting Against Forced Labour and Child Labour in Supply Chains Act (CA)
Code	Telstra's Code of Conduct. For more information, see the Our policies section of this report.
Construction and physical network infrastructure maintenance	Category of Telstra's supply chains that includes goods and services necessary for building, maintaining and repairing Telstra's physical network infrastructure, including: • construction, installation and maintenance of Telstra's network and the equipment used for this such as batteries, uninterruptible power supplies, heating, ventilation and air conditioning, racks, solar panels and generators • property and fleet management
DEI	Diversity, equity and inclusion
Digicel Pacific	Telstra PM, Telstra PM Holdings and their owned or controlled entities
Direct workforce	People working at the direction of the Telstra Group even if they are provided by a vendor (i.e., where an agency provides contractors)
EDD	Enhanced due diligence
ESG	Environmental, social and governance
Fetch TV	Media Innovations Holdings Pty Ltd ABN 21 636 073 884 and its subsidiaries
FOTs	'Feet on the streets' workers
FY23	Financial year ending 30 June 2023
FY24	Financial year ending 30 June 2024
FY25	Financial year ending 30 June 2025
FY26	Financial year ending 30 June 2026
Group Governance Operating Model	Telstra's Group Governance and Operating Model outlines the governance and operation requirements of entities in the Telstra Group. It contains the governance principles and standards with which Telstra Group entities are required to comply. It also outlines who will make key decisions and which entity or entities will execute on a range of shared services and functions.
Group Policies	Telstra's Group Polices are those policies with widespread application and significant impact to the Telstra Group and are overseen by the Telstra Group Policy Governance Framework. These include the Code, the Human Rights Policy and the Whistleblowing Policy.
Group Policy Governance Framework	The Telstra Group Policy Governance Framework: • provides a framework for the development, establishment, amendment and review of Telstra Group Policy documents • defines the roles and responsibilities in relation to the development, establishment, amendment and review of Group Policy documents • includes the Code and Group Policies
HR	Human resources
Hub	Fiji, Nauru, Samoa, Tonga and Vanuatu
ICT	Information and communications technology

Term	Meaning
ICT sector	Category of Telstra's supply chains that includes goods and services provided directly to customers, used to provide and manage our network and data services, or used by Telstra employees, including services that relate to developing and programming software and providing technology support to our customers and people.
Indirect workforce	Includes labour under the direction of outsourced partners who have access to Telstra systems in order to deliver services (e.g., consultants)
JAC	Joint Alliance for Corporate Social Responsibility
KYS	Know Your Supplier
Main Employing Entities	TGL, Telstra Limited, Amplitel, Telstra InfraCo, Telstra Purple and Telstra International, which together employ most employees in the Telstra Group
MedicalDirector	Clinical Technology Holdings Pty Limited ABN 58 611 409 011 and its subsidiaries, part of the Telstra Health Group
modern slavery	'modern slavery' as defined in section 4 of the Australian Act, 'slavery and human trafficking' as defined in section 54 of the UK Act and 'forced labour' and 'child labour' as defined in section 2 of the Canadian Act
Other categories	Categories of Telstra's supply chains that comprise non-core activities such as professional services, media and marketing, travel and uniforms
PNG	Papua New Guinea
PowerHealth	Power Solutions Holdings Pty Ltd ABN 94 609 937 500 and its subsidiaries, part of the Telstra Health Group
Procurement Principles Training	Telstra's training to help our procurement specialists understand their responsibilities. For more information, see the Our training section of this report.
Reporting Entities	The reporting entities in the Telstra Group under the Australian Act, Canadian Act and UK Act, set out in Appendix 1 of this report
Risk rating	Labour rights country risk ratings are calculated based on countries' scores in the Walk Free Global Slavery Index's analysis of countries' vulnerability to modern slavery. Total vulnerability score of 46 and above is high, 45-16 is medium, 15 or below is low. Where this information is not available for a particular country, labour and country risk ratings are calculated based on countries' scores in the World Bank Governance Indicators, Freedom House Global Freedom Score and Corruption Perceptions Index.
Sapio	Sapio Pty Ltd ABN 88 169 549 820
Supplier Code of Conduct	A Telstra policy setting out the minimum standards we expect from our suppliers. For more information, see the Our policies section of this report.
Supplier Governance Framework	Telstra's Supplier Governance Framework setting out the minimum requirements team members must meet to effectively manage our suppliers and their suppliers. For more information, see the Supplier Governance Framework section of this report.
Supplier Governance Framework Training	Telstra's training on our Supplier Governance Framework and supplier risk. For more information, see the Our training section of this report.
Supplier Risk Categories	Twelve risk categories Telstra uses to assess supplier risk. For more information, see the Supplier Governance Framework section of this report.
Telstra, the Telstra Group, we, our, us	TGL and its owned or controlled entities, including the Reporting Entities, unless otherwise specified
Telstra Health	Telstra Health Pty Ltd ABN 38 163 077 236
Telstra Health Group	Telstra Health and its subsidiaries
Telstra Holdings	Telstra Holdings Pty Ltd ABN 45 057 808 938
Telstra InfraCo	Telstra Corporation Limited ABN 33 051 775 556
Telstra International	Telstra International Holdings Pty Ltd ABN 95 648 133 475
Telstra Limited	Telstra Limited ABN 64 086 174 781
Telstra Pay TV	Telstra Pay TV Pty Ltd ABN 65 095 931 614
Telstra PM	Telstra PM Pty Ltd ABN 21 653 836 321
Telstra PM Holdings	Telstra PM Holdings Pty Ltd ABN 71 648 132 941

Term	Meaning
Telstra Purple	Telstra Purple Pty Ltd ABN 13 097 323 781
Telstra Super	Telstra Super Pty Ltd ABN 86 007 422 522
Telstra UK	Telstra UK Limited Company Number: 03830643
TGL	Telstra Group Limited ABN 56 650 620 303
TTF	Telco Together Foundation ABN 66 154 589 447
UK	United Kingdom
UK Act	Modern Slavery Act 2015 (UK)
UNGPs	United Nations Guiding Principles on Business and Human Rights
UNGPs' continuum of involvement	Explains how a business may be involved in potential or actual human rights impacts such as modern slavery: • businesses may **cause** an adverse human rights impact like modern slavery if their actions directly result in modern slavery, e.g., if a business exploits its employees, including confiscating their passports to prevent them from leaving or reporting the exploitation • businesses may **contribute** to an adverse human rights impact like modern slavery where the impact would have been unlikely to occur without their actions or omissions, including if their actions or omissions incentivise or facilitate modern slavery, e.g., if a business pressures a supplier to significantly reduce costs and lead times to an extent only achievable by using forced labour • businesses may also be **directly linked** to an adverse human rights impact such as modern slavery where their operations, products or services are connected to modern slavery through their business relationships, including entities in their value chain, e.g., if a business purchases goods from a supplier which include raw materials extracted by sub-suppliers using forced labour.
USA	United States of America
Versent	Versent Pty Ltd ABN 78 600 701 764
Versent Group	Versent, Versent Group ESS Pty Ltd ABN 25 645 539 573, Versent US Inc, Versent SG Pte Ltd and Stax-WMS Pty Ltd ABN 85 613 478 390
Whistleblowing Policy	A Telstra policy setting out protections for those reporting concerns. For more information, see the Our policies section of this report.
Whistleblowing Service	Telstra's confidential, independent, whistleblowing service. For more information, see the Grievance mechanisms section of this report.
the year, reporting year	FY25 (1 July 2024 – 30 June 2025)

Appendix 4: Additional information for the purposes of Canadian reporting requirements

Entity categorisation according to the Canadian Act:

Telstra Incorporated meets the definition of 'entity' under section 2 of the Canadian Act and meets the criteria for being a reporting entity under section 9(b) of the Canadian Act.

Under section 2 of the Canadian Act, Telstra Incorporated is an entity because it:

- sells various telecommunications services in Canada, including, by way of example, private line and internet connectivity services as part of broader global connectivity services sold primarily to non-Canadian multinational enterprise customers, and therefore does business in Canada
- has a point of presence located at 151 Front Street, Toronto, ON, Canada, and therefore has assets in Canada
- based on its financial statements for the two most recent financial years, had more than $20 million in assets and generated more than $40 million in revenue, and therefore exceeded the asset and revenue thresholds set forth in the Canadian Act.

Under section 9(b) of the Canadian Act, Telstra Incorporated is subject to the annual reporting obligation for entities because, to support its business activities in Canada, Telstra imports into Canada goods that are produced outside of Canada.