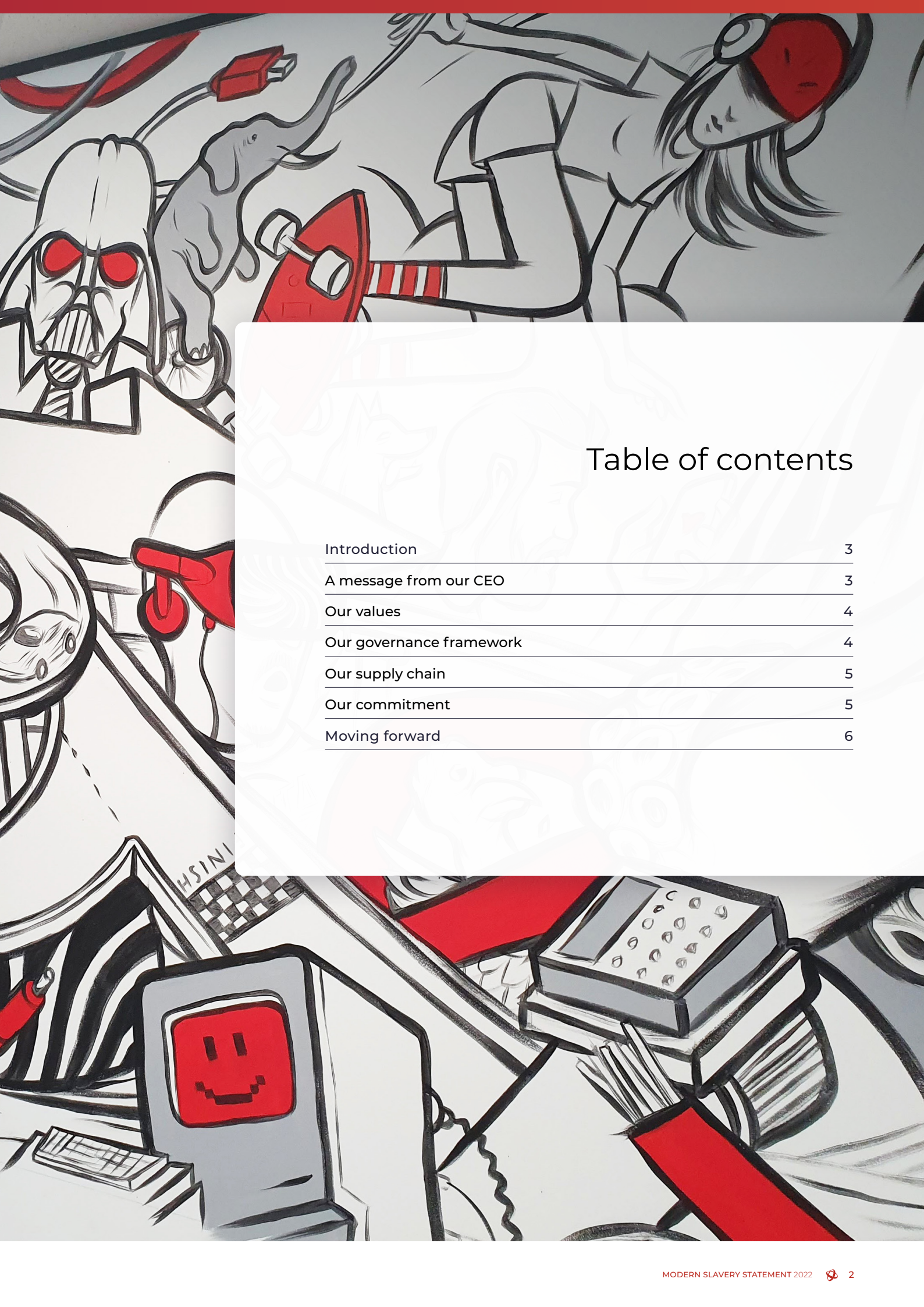




# Modern Slavery Statement

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Superloop is an ASX-listed independent provider of connectivity services that also owns and operates networks throughout the Asia Pacific region. Superloop consists of several telecommunications companies under the listed parent company Superloop Limited. With extensive carrier-grade metro fibre networks and fixed wireless networks in Australia, Superloop delivers high-performance wholesale, business and retail connectivity solutions.

### What has changed since our first Modern Slavery Statement?

Since publication of our first Modern Slavery Statement in April 2021, there has been considerable change to our business. We acquired the internet connectivity business Exetel, divested our Hong Kong and selected Singaporean assets and have just completed the acquisition of Acurus, a “white label” wholesale provider of home broadband services. Collectively, these changes mean our workforce has effectively doubled to now over 600. The Exetel acquisition meant ~280 of these staff are based in Sri Lanka and a further ~20 staff will be based in the Philippines.

Superloop Limited and its subsidiaries (Superloop) are jointly committed to implementing policies and procedures that meet our moral and ethical obligations to participate in the global collective action to end modern slavery. In preparing this joint statement, Superloop has examined and engaged with each subsidiary within the group to assess and address the risk of modern slavery.

## A message from our CEO

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We are pleased to present our second Modern Slavery Statement, which builds upon the 2021 statement by providing a more comprehensive look at our supply chain.

Superloop’s core values represent who we are, what we do, and how we go about doing business. The principle of accountability is a core value that ensures we fully accept our health and safety responsibilities in line with the law. As such, Superloop has instituted a robust governance framework that is founded on integrity and ethical standards.

As Superloop continues to grow and develop, so too does the complexity and size of our supply chain. This expansion has the potential to increase touchpoints with non-OECD nations, thus remaining vigilant in the fight against modern slavery is an ongoing commitment that I take very seriously. Protecting the human rights of those we employ and work with remains a key priority, a moral obligation and is central to Superloop’s values and identity as a leading telecommunications provider.



**Paul Tyler**  
Managing Director | Chief Executive Officer

30 June 2022

# Our values

At Superloop, we have four core values which reflect who we are and what we expect of our people and business partners. Overlaying our values is our Code of Conduct, which helps us ensure we adopt a consistently ethical approach to compliance issues across our operations, including how we address the risk of modern slavery.



## Be collaborative

We embrace diversity and the contribution every one of us can make to get the job done. We create environments that are founded on effective communication, collaboration and empathy. We recognise that we collectively make up the culture we work in every day and that we are only as strong as our weakest contributor.



## Be accountable

We care about what we do. We empower each person to do their jobs, but we hold ourselves accountable particularly if we get it wrong. We understand that there's no one in the passenger seat, every decision has a consequence, and it's our collective and individual responsibility to get things done effectively.



## Be excellent

We act on well thought out direction and purpose. We adapt as situations require and use teamwork and initiative to do so. We measure our outcomes and we never settle for good when we can be excellent.



## Always improve

We champion change as we want to better ourselves and the business. We are all about continuous learning, breaking walls, and being better at what we do - both individually and as a team. We have small business agility and we thrive on being the challenger. We give and take on feedback because we aspire to be awesome.

# Our governance framework

At Superloop, we recognise that excellence in corporate governance is underpinned by transparency and accountability. These are essential elements in the long-term performance and sustainability of our business in meeting our obligations to our stakeholders.

Superloop is committed to operating in a socially responsible and ethical manner. Superloop aims to meet the highest standards of integrity.

To learn more about our governance processes, please see our Corporate Governance Statement, available on our website at [superloop.com](https://superloop.com)

# Our supply chain

As is common in the telecommunications industry, the vast majority of our suppliers are in OECD countries. A small number sit in non-OECD countries where they occupy a very sophisticated segment of that country's economy such that the risks of Modern Slavery are reduced.

Our largest category of spend was on information and communications technology (ICT). This category includes electrical equipment, network capacity and software development. Most of these goods are manufactured and sourced by our suppliers from countries including China, Vietnam, and Thailand. However, we generally deal with an Australian based subsidiary and as such, the majority of our spend is within Australia. Most of our network is in OECD countries and is maintained by employees or contractors in accordance with local laws.

Our second largest category of spend relates to the construction and maintenance of the physical infrastructure of our telecommunications network. This activity is conducted directly or by subcontractors to our specifications. Irrespective of the delivery method, most goods and services are sourced from Australian suppliers.

The remaining procurement spend is on non-core activities, such as professional services and travel. Included in this expenditure is the use of a small number of overseas 'virtual co-workers' based in the Philippines. In these arrangements, we pay a service organisation to provide us with specialist staff on a contractual basis that is consistent with local laws and standards in each country.

We believe the highest potential for modern slavery in our supply chain is related to the following areas:

## (1) The electronic goods we use to support our networks and customers, in areas such as:

### > Sourcing raw materials

Many of the components used in electrical goods may come from developing economies and the work practices and remuneration of these workers could amount to modern slavery;

### > Assembly of electronic goods

While these goods are assembled largely in countries that have either signed and/or ratified the 'International Covenant on Civil and Political Rights', the potential remains for modern slavery; and

### > 'E-waste'

While the subject of 'E-Waste' being shipped to developing economies has received significant attention and may also constitute a violation of the Basel Convention, it still continues around the world. Recycling of these waste streams is another potential area for modern slavery.

## (2) The small number of virtual co-workers we engage through third party service agencies.

We have engaged with our third party service agencies to confirm that they are not aware of any modern slavery in their supply chains, that they comply with all relevant local laws, and that they have not been investigated or penalised by a relevant employment law regulator.

# Our commitment

## Progress

Provided below is an update of our progress towards the modern slavery related commitments we made in our first Modern Slavery Statement.

> **Progressively add a standard Modern Slavery contractual clause to new contracts for suppliers, to warrant to us that there is no modern slavery in their supply chains.**

**Complete.** We have gone one step further than our initial commitment and included modern slavery clauses in our customer contracts as well.

> **Develop and enforce a supplier code of conduct which would consider issues such as modern slavery.**

This remains a work in progress.

> **Regularly conduct audits with each of our agents providing virtual coworker services, as to their compliance with local employment laws and whether the payments they provide workers compare no less favourably than benchmarked norms for those occupations in those countries.**

Approximately 97% of our Sri Lankan staff are tertiary qualified and this wealth of talent means we now only use a handful of skilled virtual coworkers to support our finance function. Nonetheless, we did approach the providers of these services to confirm that the payments received were no less favourable than benchmarked norms for those occupations in those countries. We also conducted similar benchmarking to confirm our Sri Lanka staff salaries are consistent with benchmarked norms for the country.

> **Advocate for collective action around the issue of modern slavery through our membership of industry bodies.**

**Complete.** Unfortunately collective action around modern slavery was not something our industry associations were able to support.

> **Conduct an investigation to understand what happens to our 'E-waste' to check that processing companies are taking appropriate steps to minimise the risk of modern slavery.**

**Complete.** Based on the assessment, we do not currently generate significant volumes of e-waste. This is due to a combination of the age of the business and the longevity for telecommunications equipment. However, when we come to a significant capital renewal, we will ask any recyclers to outline what steps they will take to minimise the risk of modern slavery in the recycling of equipment.

# Moving forward

## Our focus for the 2022/2023 period will be to:

- > Establish an executive committee that will have oversight of modern slavery actions to both guide the direction of the initiatives and check the effectiveness of any actions taken.
- > Develop and enforce a supplier code of conduct which would consider issues such as modern slavery.
- > Develop and issue a modern slavery questionnaire to our top 30% of suppliers by spend.
- > Continue to undertake annual salary benchmarking in all of the jurisdictions in which we have employees to ensure remuneration is consistent with benchmarked norms for their occupation.

For any queries about Superloop's Modern Slavery reporting, please contact us at, please contact us at [investor@superloop.com](mailto:investor@superloop.com).

This statement was approved by the board of Superloop Limited in their capacity as principal governing body of Superloop Limited on 27 June 2022.





