

Modern Slavery Statement

Reporting Period: 1 July 2022 to 30 June 2023

Reporting Year: Two

About this Statement

This joint modern slavery statement (**Joint Statement**) is a consolidated description of the actions taken to address modern slavery risks by the Reporting Entities that comprise Indara. Throughout this Statement, the terms "**Indara**", "**we**", "**our**", and "**us**" are used to refer collectively to the entities within the Reporting Entities set out in **Appendix 1** (which also cover the relevant periods) unless otherwise stated.

As noted in this Statement, Indara acquired a number of entities on 30 September 2022 (see Appendix 1). These entities are references 17 to 22. Prior to 30 September 2022, the Indara Board was not part of the relevant entities, and therefore is not in a position to submit a Statement on behalf of those entities for the full period.

This Statement is made pursuant to section 14 of the *Modern Slavery Act 2018*. It constitutes the statement of each of the reporting entities set out in the 'Reporting entities covered by the statement' section for the year ended 30 June 2023 and has been approved by the Board of each reporting entity. The statement in its entirety is signed below:

Signature



Name

Title

Date

Our structure, operations and supply chain

Our structure

The ultimate parent entity of Indara is Indara Corporation Pty Ltd. Indara Corporation Pty Ltd is owned by Australian Super and Singtel.

As at 30 June 2023, Indara has a direct interest in assets around Australia, and conduct most of our business through Indara Corporation Pty Ltd and Indara Infrastructure Pty Ltd.

For a complete list of controlled entities within the Indara Group, refer to **Appendix 1**.

Reporting entities covered by the statement

This statement has been prepared by the Indara Group to meet the requirements of the *Modern Slavery Act 2018* (Cth) (MSA).

The activities described in this statement are primarily driven by Indara Corporation Pty Ltd as the parent company and main operating entity of Indara. Unless otherwise indicated, statements made in relation to the activities of the Indara apply to all reporting entities.

Reporting Entity	Description
Australian MSA Reporting Entities	
Indara Corporation Pty Ltd	The ultimate parent company of the Indara Group. Formerly known as 'Australia Tower Network Pty Ltd'.
Indara Infrastructure Pty Ltd	The primary entity which holds the assets former Axicom assets.
Indara Administration Pty Ltd	The employing entity for all personnel at Indara.

Our operations

Indara's core business is in owning, building, operating and managing an increasingly diverse network of critical physical and digital infrastructure.

With over 4,300 sites in Indara's expanding portfolio, our infrastructure comprehensively covers the nation, helping more Australians access the developing technologies shaping our contemporary digital society.

Indara's customers include major wireless carriers, emergency services, State and Federal government agencies and wireless broadband data service providers.

Our assets

Indara provides critical infrastructure solutions that empower a better digital future for our communities.

- **Towers:** Strategically located in premium areas, Indara's rapidly expanding tower network provides services where they are needed most, driving long-term value for Indara's customers and partners.
- **Rooftops:** Ensuring fast, seamless, efficient deployment and management of critical connectivity services in built-up urban areas.
- **Inbuilding:** Attract new tenants, improve retention and user experiences with enhanced multi-operator mobile connectivity indoors.
- **Multi-Function Poles:** Enabling smarter, better-connected cities and public places with multi-function poles supporting small cell deployment and smart city services.

Solutions

Indara offers expert engineering, build and property management services are designed to exceed customer expectations and accelerate network deployment programs, regardless of type or size.

- **Engineering**

Tower Upgrades: Indara offers end-to-end tower portfolio solutions that utilise our extensive engineering expertise, improving tower strength and longevity.

Portfolio Health: Portfolio Health Services ensure that customers reduce risk and maximise return on investment across their portfolio of sites.

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- **Structel**

Capacity Enhancement: Maximise tower capacity and remove or reduce the need for tower strengthening with Indara's unique engineering capabilities.

Engineering Assessments: Indara's goal is to deliver the most effective and efficient management of tower capacity for Indara's customers to ensure access to existing towers with minimum delays and upgrade expenditure.

Mount and Headframe Designs: We can design new antenna mounts and headframes to facilitate customer antenna configuration to attach to a tower or building. We also structurally assess existing mounts for proposed changes in loading conditions.

Tower Upgrade Design & Implementation: Indara's engineering team can deliver innovative, cost-effective, modular tower upgrade options to increase the capacity of almost any tower.

Design Manuals: The extensive tower and engineering experience accumulated by Structel can be accessed by Indara's customers who would like support compiling design manuals and engineering guidelines ensuring desired objectives are achieved whilst meeting regulatory compliance.

General Consultancy: Indara's full suite of solutions of structural engineering products and services provides clients with a one-stop shop for identifying and quantifying engineering problems; assessing the options and viable solutions; and supplying detailed designs that allow you freedom when sourcing installation and construction services.

- **Deployment**

Site Acquisition, Environment, Design (SAED): We offer a comprehensive suite of site development services from site feasibility through to detailed design, engineering and full SAED services, to help Indara's customers rapidly deploy their network requirements.

Build to Suit: We provide the full suite of site development services from site identification through to

construction. We build towers where Indara's customers need them most, working in close collaborative partnerships to deliver long-term strategic value.

- **Smart City**

Integrated Technologies: Indara's ecosystem of smart city infrastructure is opening the way for major advances in communications, power provision, safety and environmental care.

Data & Analytics: Capture and harness the power of data analysis to drive better outcomes for smart cities. Smart city infrastructure provides an unprecedented opportunity to improve the safety, efficiency and liveability of manmade environments.

Our Workforce

Direct Employees: As of 30 June 2023, Indara employed approximately 248 direct staff. The majority of our direct employees are located in Sydney, Melbourne, and Brisbane.

Contractors & Supply Chain: Indara also engages with organisations that have operations and employees in overseas locations, including India and Brazil. It is important to clarify that these overseas employees are not direct employees of Indara, but rather are associated through contractors or supply chain partners that we engage with.

To ensure modern slavery risks are addressed and managed, we are consistently evaluating and monitoring the practices of our contractors and partners, especially those operating in regions that might be more susceptible to such risks.

Indara's Supply Chains

According to the *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage* (Prepared by International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM)), "The five sectors accounting for the majority of total adult forced labour (87 per cent) are services (excluding domestic work), manufacturing, construction,

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agriculture (excluding fishing), and domestic work". Our procurement activities have been reviewed considering this information and these areas have been highlighted.

It was determined overall that Indara's direct operations and supply chains exhibit "Low" modern slavery risk, primarily due to the country risk associated with Indara's domestic operations.

However, some parts of Indara's supply chain exhibit comparatively higher modern slavery risk due to higher sectoral risks (e.g. construction work, construction material, manufacturing and transport, IT procurement, IT services, and cleaning services).

High-Level, Modern Slavery Risks

In December 2022, Indara completed its first Modern Slavery Statement, which resulted in a number of risk areas being identified covering two reporting periods FY2022, and FY2023. The table below contains an update to those identified risks.

Building Materials Procurement –

Indara relies on key contractors, mainly based in Australia, for the procurement of building materials. Instead of direct procurement, these contractors often outsource and obtain crucial materials like steel frames and concrete. These materials might be sourced from countries with a higher risk of modern slavery compared to Australia. The intrinsic characteristics of steel and concrete production have also been universally recognised to be associated with heightened modern slavery concerns.

Construction Services –

The construction sector inherently, bears significant modern slavery risks, especially since it traditionally employs low-skilled, temporary, and manual workers. Indara's engagement with this industry is specialised. We procure high-end construction services, particularly for intricate structures as well as key ethical processes and gateways. These services typically require a distinctively skilled and trained

workforce. Yet, even with this specialisation, the overarching risks inherent to the broader construction industry remain an area of focus.

Cleaning Services –

The cleaning services, managed by relevant building management in which Indara leases space, is another area of potential risk. The nature of cleaning jobs, characterised by lower wages and manual tasks, sets it apart as a high-risk sector in the context of modern slavery.

IT Equipment –

Indara's IT infrastructure, might have components sourced from regions with medium to high modern slavery risks. While we are aware of these risks, our actual influence over global IT equipment suppliers is somewhat limited, presenting challenges.

Indara's Governance Framework and Policies

Indara's highest level of responsibility for modern slavery sits with the Indara Board of Directors (the Board), which oversees strategy, business performance, compliance, and risk management, including modern slavery. The Board has established the Health Safety Environment & Sustainability Committee to assist in its oversight of an effective risk management framework, including as it relates to modern slavery risk management.

Indara is committed to identifying the risks of modern slavery within Indara's business and taking meaningful steps to address such risks.

The policies of particular relevance to modern slavery are our Code of Conduct, Interim Procurement Policy, Risk Management Policy and Diversity, Anti-Discrimination & Harassment Policy, which have been established to maintain integrity and confidence in Indara and safeguard the reasonable expectations of Indara's key stakeholders.

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Actions during in the reporting period

The following section summarises the key actions taken to prevent and manage the risk of modern slavery during the reporting period:

- **Policy Review:** Undertook a complete review and approval of all relevant policies and procedures by the Indara Board in December 2022.
- **Procurement and Supplier Survey:** Refined procurement processes, integrating a modern slavery questionnaire for new suppliers, with a focus on high-risk industries. Made compliance with Indara's modern slavery policy mandatory.
- **Speak Up! Whistleblower Policy:** Finalised and implemented a comprehensive Whistleblower Policy, providing multiple reporting channels and ensuring an independent investigation process for allegations related to modern slavery.
- **Contractual Controls:** Reviewed key contractors to ensure inclusion of modern slavery clauses, notably the contracts which manage our construction activities.
- **Training:** Developed a training module to enhance employees' and suppliers' understanding of modern slavery, set for rollout in the next reporting period.

These actions signify Indara's ongoing commitment to reviewing, refining, and implementing new measures as part of our modern slavery compliance roadmap section (of this Statement) which includes actions already undertaken.

Measuring the Effectiveness of Indara's Actions

Indara recognises the importance of quantifiable measures to assess the effectiveness of our actions. Here's how we measure effectiveness:

1. **Internal Mechanism:** We established an internal mechanism to quantify the effectiveness of our controls (including actions),

incorporated into our Risk Management Framework (control actions review).

2. **Metrics Development:** We aim to develop metrics to evaluate suppliers, including the percentage of contracts with incorporated modern slavery risk mitigations, staff completion rate of our modern slavery training module, the number and validity of allegations via our communication channels (including whistleblower hotline), and feedback from various stakeholders within Indara's supply chain.
3. **Whistleblower Policy:** Our Board approved Whistleblower Policy allows for the secure reporting of concerns related to modern slavery, with a thorough investigation process for received allegations.

Consultation and Collaboration

We have taken a whole-of-enterprise approach to prepare this Joint Statement. Key stakeholders from the Legal, Risk and Compliance, Finance, and Internal Audit teams of each reporting entity were actively involved in the formulation of this Joint Statement. We also provided opportunities for Indara's owned and controlled entities to offer their perspectives by circulating drafts to key stakeholders. In addition, we recognise the prominence of other ICT industry bodies such as the Joint Audit Cooperative (JAC) Supply Chain Sustainability Guidelines and the Global e-Sustainability Initiative (GeSI). We are actively exploring potential avenues for collaboration with these entities to further bolster our commitment to sustainability.

Our Compliance Roadmap

Moving forward – actions taken to prevent Modern Slavery

Indara will continue to review and refine our modern slavery processes, procedures and policies and implement new measures in line with our modern slavery compliance roadmap. As part of this process, Indara undertook a comprehensive review and approval of all relevant policies and procedures with the Indara Board in December 2022. Consistent with this, Indara is pleased to report significant progress and completion of stated objectives .

Procurement and Supplier Survey

Throughout the Second Reporting Period, Indara reviewed and refined procurement processes, incorporating modern slavery questionnaire into onboarding processes for suppliers, particularly those in high-risk industries. Compliance with Indara's modern slavery policy became a prerequisite.

Over the third reporting period, Indara will use the supplier questionnaire, and relevant information to develop a list of preferred suppliers, each assessed for modern slavery risk, was developed and will undergo regular reviews to ensure ongoing compliance and relevancy. Where suppliers are found to be deficient, Indara will always work to uplift their understanding of practices, processes and methods of activity.

Measuring Effectiveness

An internal mechanism was established during this reporting period aimed at quantifying the effectiveness of our actions to mitigate Modern Slavery Risks. This mechanism is incorporated into our overall Risk Management program which has been approved by the Indara Board in December 2022.

Over the third report period Indara intend on developing metrics to evaluate suppliers, including percentage of contracts with incorporated modern slavery risk mitigations, staff completion rate of our modern slavery training module, the number and validity of allegations via our communication channels, and feedback from various stakeholders within Indara's network.

Anti-Modern Slavery Processes

In this period, Indara finalised integration of key controls into its Procurement processes. This re-affirms our commitment to mitigating and eliminating modern slavery risks where identified. The processes define concepts of modern slavery and human trafficking, establishes our zero-tolerance stance, and outlines internal reporting obligations and potential indicators that Indara employees should be alert to. These processes, among others, will be subject to periodic reviews to assure its continual applicability and effectiveness.

Speak Up! Whistleblower Policy

Indara's Whistleblower Policy was finalised, providing a safe conduit for staff and third parties to report concerns, potentially pertaining to modern slavery risks or incidents. A multitude of reporting channels was introduced, ensuring accessibility and ease of use for all parties. The policy also incorporates a thorough investigation process for received allegations, which is undertaken by an independent third-party where required.

Contractual Controls

Indara undertook a review of key contractors to ensure pertinent modern slavery clauses were included. Most recently in the Megalodon BTS-2 tender. The processes around inclusion of these clauses continues to be defined and is anticipated to be defined within reporting period three.

Our Compliance Roadmap

Training

A training module was developed during Indara's Second Reporting Period, which is set to be rolled out in the Third Reporting period aimed at enhancing our employees' knowledge and understanding regarding modern slavery, while also accounting for the training needs of our suppliers.

Supplier Code of Conduct

For the upcoming Third Reporting Period, we plan to implement Indara's external-facing Supplier Code of Conduct (elements of which are included currently in the revised Procurement processes). This is being designed to align seamlessly with a revised Modern Slavery Policy. The purpose of the code is to define the minimum standards we anticipate from Indara's suppliers. Additionally, we aim to integrate this Code of Conduct into our standard purchasing terms to ensure consistent adherence across all supplier engagements.

Appendix 1 – Reporting Entities

Ref.	Reporting Entity
1.	Indara Corporation Pty Ltd (ACN 643 875 165)
2.	Indara Corporation Holdings Pty Ltd (ACN 658 191 738)
3.	Indara Asset Pty Ltd (ACN 605 786 490)
4.	Indara Asset HoldCo Pty Ltd (ACN 605 778 514)
5.	Indara Hold Trust (ABN 42 508 575 162)
6.	Indara Asset Trust (ABN 73 907 540 472)
7.	Indara Finance Pty Ltd (ACN 605 452 435)
8.	Indara HoldCo Pty Ltd (ACN 605 798 829)
9.	Indara BidCo Pty Ltd (ACN 605 799 899)
10.	Indara Infrastructure Holdings Pty Ltd (ACN 086 370 274)
11.	Indara Properties Ltd (ACN 116 320 515)
12.	Indara Infrastructure Pty Ltd (ACN 090 873 019)
13.	Indara Administration Pty Ltd (ACN 151 461 817)
14.	Structel Pty Ltd (ACN 064 274 835)
15.	Indara Inbuilding Solutions Pty Ltd (ACN 605 800 511)
16.	Indara Services Pty Ltd (ACN 600 590 878)
17.	HUB SE Holdings Pty Ltd (ACN 611 271 946) (for the period 30 September 2022 to 30 June 2022)
18.	ENE.HUB Pty Ltd (ACN 165 757 559) (for the period 30 September 2022 to 30 June 2022)
19.	HUB Australasia Pty Ltd (ACN 611 271 937) (for the period 30 September 2022 to 30 June 2022)
20.	HUB Qatar Pty Ltd (ACN 604 463 514) (for the period 30 September 2022 to 30 June 2022)
21.	HUB Street Equipment Pty Ltd (ACN 109 882 617) (for the period 30 September 2022 to 30 June 2022)
22.	HUB Innovations Pty Ltd (ACN 611 272 050) (for the period 30 September 2022 to 30 June 2022)

Appendix 2 – Mandatory Criteria Checklist

The table below indicates aspects of Indara’s statement which relate specifically to the mandatory criteria for modern slavery statements in the *Modern Slavery Act*.

Mandatory Criteria	Reference
a) Identify the reporting entity.	<ul style="list-style-type: none"> About this Statement (page 1)
b) Describe the reporting entity's structure, operations and supply chains.	<ul style="list-style-type: none"> Who Indara is (page 2) Indara’s Structure, Operations and Supply Chains (page 2-5) Appendix 1 (page 8)
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<ul style="list-style-type: none"> Modern Slavery Risks in Indara’s Operations and Supply Chains of any Entities We Own or Control (page 4)
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	<ul style="list-style-type: none"> Indara’s Governance Framework and Policies (page 4)
e) Describe how the reporting entity assesses the effectiveness of these actions.	<ul style="list-style-type: none"> Measuring the Effectiveness of our Actions (page 5)
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	<ul style="list-style-type: none"> Consultation (page 5)
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	<ul style="list-style-type: none"> Looking Forward – Modern Slavery Compliance Roadmap (page 6-7)