

Modern Slavery Statement

1 July 2023 to 30 June 2024



About This Statement

This modern slavery 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 unless otherwise stated.

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 2024 and has been approved by the Board of each reporting entity. The statement in its entirety is signed below:



Sue O'Connor
Chair
Indara Board

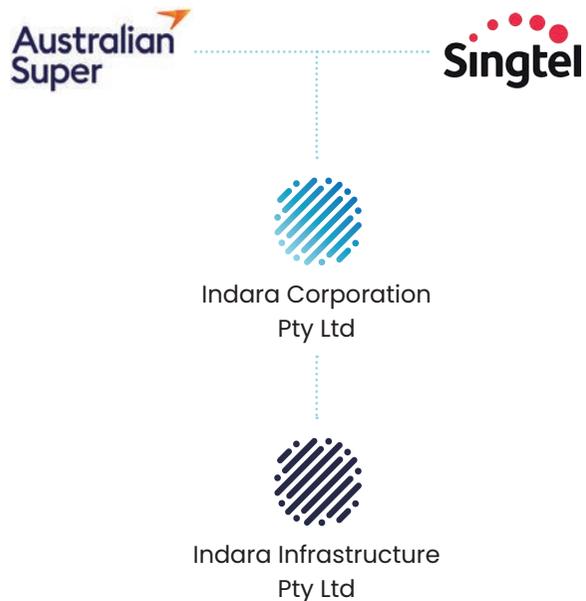
Date: 11 December 2024

Our Structure, Operations, and Supply Chains

Structure

The ultimate parent entity of Indara is Indara Corporation Pty Ltd. Indara Corporation Pty Ltd is owned by Australian Super (~88%) and Singtel (~12%). As at 30 June 2024, 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, refer to Appendix 1.



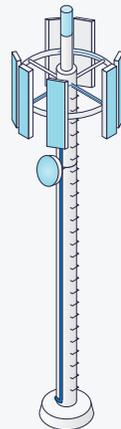
Operations

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

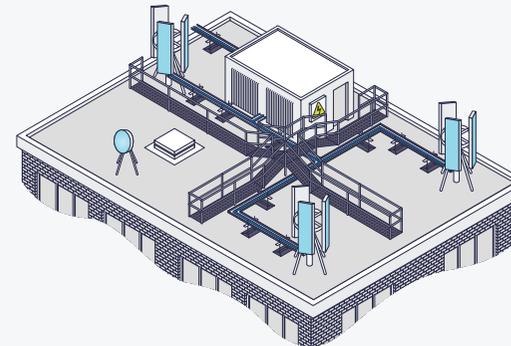
With over 4,500 sites in Indara’s expanding portfolio, our infrastructure comprehensively covers the nation, helping more Australians access the developing technologies shaping our contemporary digital society.

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

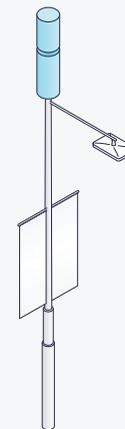
Our services include:



Towers: Providing extensive tower networks in strategic locations.



Rooftops: Facilitating connectivity in urban areas.



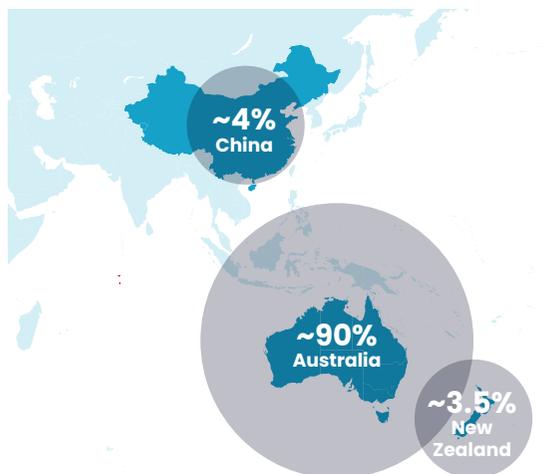
Multi-Function Poles: Supporting smart city services and small cell deployment.

Workforce and Partners

- > **Direct Employees:** As of 30 June 2024, Indara employed approximately 272 direct employees. The majority of our 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 China and New Zealand. It is important to clarify that these overseas engagements 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 may be susceptible to such risks.

Distribution of direct vendors worldwide



Supply Chains

Our supply chains involve procurement of goods and services necessary for our operations, including:



Modern Slavery Risk Areas

High-Level Analysis

We recognise that certain sectors and jurisdictions in our operations and supply chains present higher risks of modern slavery. Our main modern slavery risks are:



Consultants and Contractors outside Australia

Indara engages consultants and contractors based outside Australia, particularly in countries like India and China, for services such as engineering design and IT support.

Risk Factors:

- > **Jurisdictional Risks:** Higher modern slavery risks due to weaker labour laws and enforcement.
- > **Limited Oversight:** Challenges in monitoring compliance because of distance and different legal systems.
- > **Subcontracting Chains:** Potential for further subcontracting increases risk in the supply chain.



Construction Services

Our operations involve significant construction activities across Australia, including building and maintaining towers and infrastructure.

Risk Factors:

- > **Labour Exploitation:** Use of low-skilled, low-wage, temporary, or migrant workers who may be vulnerable.
- > **Subcontracting:** Multiple layers can obscure labour practices and working conditions.



ICT equipment

We rely heavily on ICT equipment at our offices like network equipment, servers, and communication devices.

Risk Factors:

- > **Complex Supply Chains:** Components often sourced from countries with higher modern slavery risks.
- > **Raw Material Extraction:** Minerals like cobalt and tantalum may be mined using child or forced labour.



Cleaning Services

Indara operates in leased office spaces (Sydney, Melbourne, Brisbane) and facilities where cleaning services are provided, often managed by building management companies which may reduce our direct oversight.

Risk Factors:

- > **Labour Exploitation:** Cleaning services typically employ low-wage, manual labour workers, including migrants and visa holders who may be vulnerable to exploitation.
- > **Outsourcing and Subcontracting:** These services are frequently outsourced, with multiple layers of subcontracting, making it difficult to monitor labour practices.
- > **Lack of Visibility:** Limited direct engagement with cleaning staff can obscure issues related to wages, working conditions, and workers' rights.



Solar panels

As part of our sustainability efforts, we're installing solar panels at our sites to reduce carbon emissions.

Risk Factors:

- > **Forced Labour Allegations:** Solar panel production, especially in regions like Xinjiang, China, is linked to forced labour and exploitation of minority groups.
- > **Supply Chain Transparency:** Difficulty in tracing suppliers can obscure unethical practices.



Actions Taken to Assess and Address Risks

FY2024 Actions

- ✓ 1. **Supplier Risk Assessment:**
 - > **Risk Profiling:** Analysed suppliers using procurement data and surveys to identify high-risk ones based on location, industry, and practices.
 - > **Targeted Due Diligence:** Focused resources on high-risk suppliers for deeper engagement and assessment to mitigate modern slavery risks.

- ✓ 2. **Audit of Overseas Consultancy:**
 - > **On-Site Audit in India:** Conducted an audit of our engineering partner in India, a country identified as high risk by the Global Slavery Index and ILO reports.
 - > **Assessment Activities:** Reviewed labour practices, policies, and conducted employee interviews to ensure compliance with modern slavery laws.
 - > **Corrective Actions:** Developed plans to address any issues and scheduled follow-up assessments.

- ✓ 3. **Enhanced Whistleblower Communications:**
 - > **Awareness Campaign:** Launched a company-wide initiative to promote our Whistleblower Policy through materials and training sessions.
 - > **Accessible Reporting Channels:** Ensured multiple, easily accessible avenues for reporting concerns, available 24/7.
 - > **Response Protocols:** Established clear procedures for timely investigation and action on reports received.



Next steps – FY2025 and beyond

FY2025 Planned Actions

»» 1. Supply Chain Review of Manufacturing Activities

We will conduct a comprehensive assessment of our Chinese suppliers of steel jackets, solar panels and critical products by mapping their locations, ownership, and specific goods supplied. Using tools like the Global Slavery Index, we'll evaluate each supplier's risk of modern slavery exposure and engage directly with them to communicate our compliance expectations. For high-risk suppliers, we'll schedule on-site factory audits to review labour practices, working conditions, wage compliance, and health and safety standards, including confidential worker interviews to assess employment conditions. We'll produce audit reports highlighting any non-compliance issues, collaborate on corrective action plans with clear timelines, and conduct follow-up audits to ensure issues are addressed. Ongoing monitoring will include regular reviews and performance metrics to assess supplier compliance over time.

»» 2. Digitisation of Modern Slavery Questionnaire

We'll implement a secure, user-friendly digital platform to replace manual, Word-based questionnaires for supplier compliance management (as it relates to Modern Slavery). This platform will be customised to address specific risks across different supplier categories, ensuring data protection standards are met. Integration with our existing procurement systems will streamline data flow and reporting. We'll provide training for internal teams and suppliers on using the new system effectively, offer support resources, and utilise real-time analytics and automated alerts to monitor supplier responses, enabling prompt identification of potential risks and detailed reporting for stakeholders.

»» 3. Modern Slavery Training Update and Review

We will update and review our modern slavery training programme to ensure it reflects current legislation, emerging risks, and best practices. Training will be delivered to all employees through online courses, interactive workshops, and webinars, accommodating different learning preferences, with mandatory participation and annual refreshers. We'll engage key suppliers, particularly those in high-risk categories, inviting them to participate and providing resources to help develop their own internal training. Participation and completion rates will be tracked, feedback collected through surveys and assessments, and training content will be continuously improved based on this feedback.

»» 4. Holistic Review and Update of Supplier Code of Conduct

We'll undertake a holistic review and update of our Supplier Code of Conduct to ensure it remains comprehensive and aligns with international guidelines like the UN Guiding Principles on Business and Human Rights. This updated Code will be integrated into all new and existing supplier contracts, making adherence a binding requirement, and suppliers will be required to formally acknowledge their commitment. We'll monitor compliance through self-assessment tools, audits, and reviews, and address any violations with corrective action plans or potential termination of the business relationship. We'll support suppliers by offering guidance materials, training, and creating channels for feedback to foster a collaborative approach to ethical practices.

Case Study:

Ensuring Compliance in Overseas Engineering Consultancy

In FY2024, Indara identified the need for specialist engineering services to support our infrastructure projects. We considered partnering with an overseas consultancy based in India—a country identified as high-risk for modern slavery by external sources such as the **Global Slavery Index** and reports from the **International Labour Organization (ILO)** highlighting issues of forced labour and exploitation.

Aware of these risks, we took proactive steps to ensure compliance with Australian modern slavery laws and uphold expectations as set out in our policies. We conducted a comprehensive risk assessment, including thorough due diligence on the consultancy's labour practices and policies. Independent reports and compliance histories were reviewed to verify their commitment to ethical labour standards.

Prior to formal engagement, we dispatched a team to the consultancy's facilities in India to observe working conditions and processes directly. Our team conducted private interviews with employees to understand their working conditions, type of engagement, and overall treatment. We provided the consultancy with Indara's Modern Slavery Policy and Supplier Code of Conduct, requiring formal acknowledgment, and collaborated on delivering training about modern slavery risks and compliance.

We established robust reporting mechanisms by extending our whistleblower program to the consultancy's employees, ensuring they could confidentially report any concerns. We implemented quarterly reporting requirements on labour practices and any incidents related to modern slavery. Continuous monitoring was maintained through scheduled performance reviews and the option for unannounced audits by independent third parties.

We subsequently incorporated stringent modern slavery clauses into our contract, mandating adherence to all applicable labour laws and international human rights standards. We required the consultancy to ensure any subcontractors also complied with these standards.

By taking these measures, we ensured the consultancy aligned with our ethical standards and modern slavery laws. The partnership delivers high-quality engineering design work while protecting the rights and welfare of all workers involved. This case study underscores Indara's commitment to preventing modern slavery in our operations and supply chains and demonstrates our diligent and practical approach to risk management.



Measuring the Effectiveness of Our Actions

Governance and Oversight	<p>Monitoring Progress: Our efforts to address modern slavery are overseen by our Audit Risk and Compliance Committee, with regular updates provided to the Board. This oversight ensures that our strategies are effectively implemented and aligned with our organisational goals.</p>
	<p>Incident Reporting: Any significant compliance breaches related to worker exploitation or modern slavery are promptly reported to senior management and the Board. This allows for immediate action to address issues and prevent recurrence.</p>
	<p>Cross-Department Collaboration: We engage with various teams across Indara—including Legal, Commercial, People & Culture, and Operations—when developing our Modern Slavery Statement. This collaborative approach ensures a unified and comprehensive response to modern slavery risks.</p>
Policy Implementation and Review	<p>Regular Policy Reviews: We routinely evaluate our Modern Slavery Policy, Code of Conduct and related procedures to ensure they remain current and effective. These reviews consider any identified breaches, changes in legislation, and feedback from stakeholders.</p>
	<p>Supplier Audits: Selected suppliers are audited to assess their adherence to our requirements. The findings help us identify areas for improvement and enhance our engagement strategies with suppliers.</p>
Training and Awareness	<p>Tracking Training Completion: We monitor the completion rates of our existing modern slavery training program to gauge awareness levels among our employees. Our goal is full participation, particularly from those in high-risk roles such as procurement and supply chain management.</p>
	<p>Assessing Training Impact: We collect feedback from participants to evaluate the effectiveness of the training in increasing their understanding of modern slavery issues. This feedback informs improvements to our training content and delivery methods.</p>
	<p>Updating Training Content: Our training programs are regularly reviewed and updated to reflect changes in legislation, emerging risks, and best practices. This ensures our employees are equipped with up-to-date knowledge to identify and mitigate modern slavery risks.</p>

Risk Assessment and Supplier Engagement	Reviewing Risk Assessment Processes: We annually assess our risk evaluation methods to ensure they effectively identify and address modern slavery risks within our supply chain.
	Monitoring Supplier Due Diligence: Key metrics are tracked, such as the number of suppliers undergoing enhanced due diligence, those onboarded through our supplier verification processes, and those flagged for further assessment.
	Supplier Audit Outcomes: We monitor the results of supplier audits, including the number of issues identified and resolved. Corrective action plans are tracked to ensure timely remediation of any non-compliance.
	Updating Supplier Code of Conduct: We periodically review and update our Supplier Code of Conduct to ensure it effectively mitigates modern slavery risks and aligns with international standards. Suppliers are required to acknowledge and comply with the updated Code.
Grievance Mechanisms	Whistleblower Reports: We track the number and nature of reports received through our whistleblower channels, including any related to modern slavery concerns. This helps us identify potential issues within our operations or supply chain. Indara 'Speak Up' Culture Whistleblower Hotline
	Investigations and Resolutions: The number of investigations initiated and substantiated claims are monitored to assess the effectiveness of our grievance mechanisms and response procedures.
	Supplier Grievance Systems: During supplier audits, we evaluate whether suppliers have effective grievance mechanisms in place for their workers, ensuring issues can be raised and addressed appropriately.
Continuous Improvement	Benchmarking and External Feedback: We seek external evaluations of our modern slavery response to benchmark our performance against industry best practices. This includes reviewing analyses of our Modern Slavery Statement by independent organisations.
	Industry Collaboration: Participation in industry groups and initiatives allows us to stay informed about good practice trends and contribute to collective efforts to combat modern slavery.
	Stakeholder Engagement: Feedback from employees, suppliers, and other stakeholders is actively sought to identify areas for enhancement. This collaborative approach helps us refine our strategies and improve the effectiveness of our actions.



Consultation and Collaboration

We have adopted a whole-of-enterprise approach in developing this Statement. Internally, we engaged key stakeholders from our Legal, Finance, and Internal Audit teams across all reporting entities. Drafts of the Statement were circulated among these teams to gather comprehensive feedback and ensure input from all owned and controlled entities.

In terms of industry collaboration, we are exploring partnerships with industry bodies such as the Joint Audit Cooperative (JAC) Supply Chain Sustainability Guidelines and the Global e-Sustainability Initiative (GeSI). These collaborations aim to enhance our efforts in combating modern slavery by aligning with industry best practices and leveraging shared resources.

Other Relevant Information

Commitment to Ongoing Improvement

Indara is committed to continuously improving our approach to identifying and addressing modern slavery risks. We are updating our Modern Slavery Policy to reflect best practices and any legislative changes, ensuring that our policies remain current and effective. Engaging with customers, suppliers, and industry peers is a key part of our strategy to promote awareness and develop collaborative solutions to modern slavery challenges. Transparency is essential to our approach; we maintain open communication about our efforts and progress in combating modern slavery, demonstrating our dedication to ethical practices and the protection of human rights.

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)
18. ENE.HUB Pty Ltd (ACN 165 757 559)
19. HUB Australasia Pty Ltd (ACN 611 271 937)
20. HUB Qatar Pty Ltd (ACN 604 463 514)
21. HUB Street Equipment Pty Ltd (ACN 109 882 617)
22. HUB Innovations Pty Ltd (ACN 611 272 050)

Appendix 2:

Mandatory Criteria Reference Table

The following table indicates aspects of Indara's Statement that relate specifically to the mandatory criteria for modern slavery statements under the 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">• Our Structure, Operations, and Supply Chains (page 2)• Appendix 1 (page 12)
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 Risk Areas (pages 4 & 5)
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">• Actions Taken to Assess and Address Risks (page 6)
e) Describe how the reporting entity assesses the effectiveness of these actions.	<ul style="list-style-type: none">• Measuring the Effectiveness of Our Actions (pages 9 & 10)
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	<ul style="list-style-type: none">• Consultation and Collaboration (page 11)
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	<ul style="list-style-type: none">• Other Relevant Information (page 11)

Contact us

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