

# TUAS

Building Better Connections

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Tuas Limited  
ABN 70 639 685 975

Modern Slavery Statement  
For the year ended 31 July 2024

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## Background

This is the initial modern slavery statement for Tuas Limited for the Financial Year ended 31 July 2024 (**FY24**).

Although Tuas Limited uses a share registry office in Australia, it does not otherwise carry on any operational business in Australia. It is an Australian corporation with a consolidated revenue for FY24 in excess of AUD\$100m. It is therefore required by section 13 of the Modern Slavery Act, 2018 (the **Act**) to provide this modern slavery statement which complies with section 16 of the Act.

This statement is approved by the Board of Tuas Limited.

## Identity of the Reporting Entity

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

## Structure, operations and supply chains of the reporting entity

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

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

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

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

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

Simba does not sell mobile handsets or consumer equipment other than modems which are supplied as part of its fibre broadband services and basic smartphones endorsed by IMDA to on-board senior citizens. The end-user devices are provided by reputable global suppliers.

## Modern slavery risks in operations and supply chains

As described in the previous paragraph, Tuas has a very limited number of direct suppliers, and its primary supplier is a large international reputable organisation. Based on the information available to us and its experience with those suppliers, the risk of modern slavery existing directly within the workforce of those suppliers is low. The suppliers themselves, in many cases, have obligations to make their own modern slavery statements in Australia or elsewhere.

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

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

## Actions taken to assess and address risks

Tuas has an Audit and Risk Committee that assesses the risks of modern slavery in its supply chain. The high-level outcome of that assessment is described in the preceding section. The steps taken have been to note that its primary supplier of equipment has itself lodged modern slavery statements in Australia and elsewhere. A review of those statements gives Tuas confidence that that supplier has taken steps to consider and address risks of modern slavery in its supply chain.

## Assessment of the effectiveness of such actions

Tuas acknowledges the importance of minimising modern slavery but, given the nature of its supply chain and its limited ability to see through that supply chain to places where the risk of modern slavery might be considered higher, Tuas must accept that it has low capability to take steps that would have a meaningful impact, even if modern slavery actually exists in that supply chain.

26 November 2024



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David Teoh  
Executive Chairman