

## Aussie Broadband Modern Slavery Statement

Aussie Broadband Limited (ABN 29 132 090 192) (Aussie Broadband) is now subject to the requirements of the Australian *Modern Slavery Act 2018* (Cth) and will incorporate these requirements into its Annual Modern Slavery Statement.

This Modern Slavery (**Statement**) relates to the financial year 1 July 2019 to 30 June 2020.

### What is Modern Slavery:

Universally, definitions of Modern Slavery are varied, but include exploitative practices such as human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage in serious violation of an individual's dignity and human rights.

Modern slavery occurs not only in foreign countries (which might include Australian business supply chains) but also in Australia. It is estimated, by the Australian Institute of Criminology, that up to 1,900 Australians were living in conditions of modern slavery in 2015-16 and 2016-17.

### Statement from the Managing Director, Phillip Britt

*'There has never been a more important time for industry collaboration as companies, supply chains and customers grapple with modern slavery and its appalling, often hidden, impact on people. Aussie Broadband looks forward to seeing what we can achieve together, over and above what we can achieve independently.'*

### FY2020 Attestation

To date, Aussie Broadband has not had any issues raised with it or reported to it regarding modern slavery, human trafficking or human rights, associated directly with its operations or its supply chains. This statement was approved by the Board of Aussie Broadband Limited on 26 November 2020.



---

Phillip Britt  
Managing Director  
November 2020

## About Aussie Broadband

**Aussie Broadband** is an Australian telecommunications carrier often described as a challenger internet service provider, offering a range of services across the residential, small business and enterprise segments. Aussie Broadband has evolved from a start-up, over 17 years ago, to becoming the fifth largest provider of NBN services across Australia and a publicly listed company on the Australian Stock Exchange in 2020.

With a reputation for providing high-quality internet services and transparent customer service, we are in business to change the telco game – not just for our customers, but for all telco customers in Australia.

Aussie Broadband opposes Modern Slavery in all its forms. This Statement outlines the steps we have taken, and will take, to minimise the risk of Modern Slavery occurring in our business or our supply chains.

Aussie Broadband is based in Morwell, Victoria, and is one of the largest employers in the Latrobe Valley region. We have a further contact centre in Lynbrook, Victoria and a sales office in Darwin. Wideband Network Pty Ltd is a subsidiary of Aussie Broadband.

### **Aussie Broadband's Policies and Principles**

One of Aussie Broadband's fundamental values is *'be good to people'*. Being good to people includes having a positive impact on the community. Aussie Broadband does not tolerate slavery, human trafficking, forced labour, child labour, or child exploitation. Aussie Broadband has various policies which assist in managing human rights risk within its business and supply chains, including:

- Procurement Policy
- Supplier Code of Conduct
- Code of Conduct
- Whistle-blower Policy
- Gifts, Entertainment and Anti-Bribery Policy
- Grievance and Complaints Policy

Aussie Broadband has undertaken consultation, through its Foundation Membership of the Telco Together Modern Slavery Roundtable, to review and inform its policies, processes and practices to meet its obligations under the Act.

## **Aussie Broadband's Modern Slavery Risk Management and Due Diligence Processes**

As an Australian-based telecommunications service provider with a 100% onshore workforce (no operations outside of Australia), Aussie Broadband considers the risk of Modern Slavery within its direct business operations to be low.

However, Aussie Broadband understands that through its supply chains, it can be indirectly exposed to the risk of Modern Slavery as described in the Act.

In building our compliance with the Act for our first and future Statements, Aussie Broadband will ensure that our existing risk management processes consider modern slavery risk. Any identified risk in our supply chains will be investigated and noted for continuing monitoring. We will report on that monitoring in each successive Statement.

The steps we will undertake include:

1. Assessing the potential modern slavery risks in our operations and supply chains, with emphasis on high-risk geographical locations and business transactions
2. Reviewing company policies that may raise the risk of modern slavery in our operations and supply chain
3. Developing training for staff in modern slavery awareness and regulatory (risk avoidance) requirements
4. Conducting due diligence on local and global supply chains
5. Reviewing supplier contracts to ensure they contain terms that are consistent with the Act
6. Taking steps to address any potential modern slavery risks and
7. Establish a program to measure the effectiveness of our actions through performance monitoring and reporting.

## **Aussie Broadband Supply Chains**

Aussie Broadband has a primarily Australian supply chain, with an overarching objective of "*buy local, buy Australian first*". This objective ensures that we largely avoid contact with international regions of significant modern slavery risk.

Our supply chain relationships include suppliers from the following sectors:

- Information, communications and technology.
- Property services (including utilities, cleaning, waste management and security).
- Marketing, printing, promotional goods and services.
- Office supplies and corporate clothing.

Aussie Broadband strives to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Aussie Broadband recognises that as a purchaser of goods and services, the business conduct and performance of its suppliers can have a significant impact on its performance and reputation within the communities it operates in.

Aussie Broadband will conduct ongoing reviews of our supply chain to understand how/if these sectors have the potential to expose Aussie Broadband to modern slavery and human trafficking risks.

This will be reported on in subsequent Statements.

### **Aussie Broadband's Procurement Policy & Supplier Code of Conduct**

Aussie Broadband's Procurement Policy and Supplier Code of Conduct cites our expectations on modern slavery, including for example, that suppliers to not use forced labour, slavery or servitude in their workforce. We seek confirmation and evidence from vendors and suppliers via the modern slavery self-assessment questionnaire (**SAQ**) that was endorsed by the Telco Together Modern Slavery Roundtable.

In the first Modern Slavery Statement period, Aussie Broadband will undertake a risk assessment on our supply chain, which will highlight the potential for exposure to Modern Slavery through our:

- Purchase of office consumables such as printing paper, tea, coffee and other kitchen consumables
- External cleaning services employed by building owners or facilities managers for buildings occupied by Aussie Broadband
- Purchase of corporate clothing
- Sourcing of print and promotional goods and services.

Together with the Telco Together modern slavery industry forum, Aussie Broadband is creating a set of overarching principles to aid in the identification and management of Modern Slavery risks within our supply chain. The principles will be used to inform Aussie Broadband's procurement and sourcing processes.

Actions undertaken within the FY2020 to minimise the risk of Modern Slavery within our supply chain include:

- Ensuring that all purchased office consumables are ethically produced, such as Fairtrade certified tea, coffee, sugar, etc., for our staff kitchens.
- Reviewing and monitoring our corporate clothing providers practices via direct query.
- Developing a self-assessment questionnaire to include in our Procurement Policy for all purchases.

## **Grievance, Confidential Reporting and Feedback Mechanisms**

Aussie Broadband has a dedicated whistle-blower framework. This framework includes a dedicated policy, associated training and an independent third-party provider that allows employees and contractors to raise any issues or concerns in a confidential manner. Our feedback and complaint reporting process can also be used to report any concerns or queries. Grievances can be received via social media and direct correspondence.

Where grievances or concerns are raised, we will address and investigate the matter accordingly. This may include direct engagement with customers and other stakeholders. In these cases, we take steps to investigate and understand the issue(s) and take appropriate action, which may involve referring the matter to the appropriate authorities (in the case of allegations of modern slavery), or engaging with the customer about areas of concern within our organisation.

## **Training and Communications**

Aussie Broadband has created internal positions, including Community Impact positions that have, as a part of their roles, a focus on environmental awareness, ethical conduct and modern slavery/ human rights concerns. This area of the business is expanding to ensure all and any business customer impact is monitored.

In this FY2020 and each subsequent year, all Aussie Broadband employees will undergo modern slavery awareness training through training programs developed internally by our specialist training team. The training will have a performance monitoring measure implemented to assess its effectiveness.

## **Ongoing Modern Slavery Mitigation Strategies:**

In the next modern slavery statement, Aussie Broadband will report on the following actions:

- The development of a governance process to facilitate consultation and the preparation of annual modern slavery statements which meet the requirements of the *Modern Slavery Act 2018* (Cth).
- The creation of a schedule gap analysis of current policies and practices against the requirements of the *Modern Slavery Act 2018* (Cth).
- Our continued engagement in industry-wide consultation and collaboration and information/ resource-sharing through membership of the Telco Together Modern Slavery Roundtable.

For further information, please contact Andrew Webster, Head of Risk & Compliance, [Andrew.webster@team.aussiebroadband.com.au](mailto:Andrew.webster@team.aussiebroadband.com.au)