

Modern Slavery Act Statement 2024

VOCUS

About this statement

Modern slavery, including trafficking, forced marriage, and child labour, is a severe form of human exploitation. We acknowledge the risks in our business operations and are committed to identifying and mitigating these risks in our value chain.

Vocus Group Limited (Vocus) is a reporting entity as defined by the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement (Statement) is made on behalf of Vocus and its subsidiaries for financial year ending 30 June 2024.

Vocus remains committed to respecting and supporting the protection of human rights as set forth in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

This Statement details actions taken to identify and mitigate the risk of modern slavery. Our efforts encompass thorough due diligence processes, regular audits, and engagement with stakeholders across our supply chain. We strive to create a culture of transparency and accountability, ensuring we respect and promote human rights with our employees, suppliers and partners.

This Statement is available at: <https://www.vocus.com.au/about-vocus/social-impact/governance>

A message from our Chair and CEO

This year has been one of significant progress and valuable learning for Vocus as we continue our dedication to addressing modern slavery within our operations and supply chains. We are proud to present our fifth annual Modern Slavery Statement, which highlights our persistent efforts and achievements in this critical area.

We have made substantial strides in enhancing our modern slavery due diligence processes. One of our key accomplishments was the development of a compliance training module tailored to our employees. This training, which includes case studies and scenarios relevant to the telecommunications industry, equips our workforce with the knowledge to identify and mitigate modern slavery risks effectively.

The project to develop unified risk assessment platform for shared suppliers with Telco Together Foundation's Industry Impact Hub provided invaluable insights into the complexities involved in collaborative projects. Unfortunately, we were unable to configure the platform and the project was discontinued. However, we remain committed to industry collaboration and continue to evaluate opportunities to work with our peers.

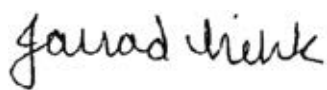
Considering the above, Vocus selected and implemented our supplier risk assessment platform in June 2024. This platform has allowed us to onboard all our suppliers and offers a streamlined view of modern slavery risks within our supply chain. The results of our risk assessment are detailed in this Statement.

We did not identify any instances of modern slavery in our operations or supply chain throughout the reporting period. However, we acknowledge that managing modern slavery risk is complex, and the risk landscape is ever evolving. We therefore remain deeply committed, in line with our purpose, to actively maturing our approach over time.

In FY25, we will continue to embed our commitment to human rights across Vocus. This involves not only engaging with our industry peers to drive operational and cultural change but also conducting thorough assessments of our operations and supply chain to identify and address any emerging risks of modern slavery.

Our journey towards eradicating modern slavery is ongoing, and we are dedicated to promoting responsible and accountable business practices. Together, we will navigate the complexities and challenges that lie ahead, ensuring that human rights are at the forefront of our operations.

We appreciate the unwavering support from our employees, suppliers, and partners as we continue this essential work.



Mr Jarrod Nink
Interim Chief Executive Officer



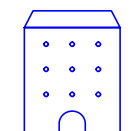
Ms Penny Bingham-Hall
Chair of the Board

Organisational structure, operations and supply chains

Our organisation



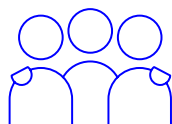
We own and operate a **27,000km fibre network** across Australia purpose-built and managed for business, wholesale and government customers



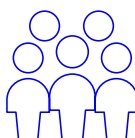
We have on-net access to over **6,000 buildings** in Australia



We operate **17 data centres** across Australia



We have over **650,000 consumer customers** across our in-market brands: Dodo and iPrimus with ~900,000 services in operation



As at 30 June 2024, we employ **1,346 people in full-time, part-time, or contract roles** in Australia. Of these, 97% are permanent employees



We have around **1000 team members in the Philippines**, employed by a third party partner, providing a range of functions, including consumer customer support and back-office operations.

Our operations

As Australia's specialist fibre and network solutions provider, we own and operate approximately 27,000 kilometres of secure, high-capacity fibre connecting all Australian mainland capitals with New Zealand, Asia and the USA. Our network includes the Australia Singapore Cable (ASC) from Perth to Singapore via Indonesia, the North-West Cable System (NWCS) from Port Hedland to Darwin, and the connection between the NWCS and the ASC to form the Darwin-Jakarta-Singapore Cable system (DJSC).

Vocus is headquartered in Melbourne, Australia. We operate across all Australian states and territories.

We own a portfolio of well-recognised telecommunications brands that provide services to enterprise, government, wholesale, small business and residential customers across Australia. Our primary go-to-market brands are shown below.

Consumer

dodo

iPrimus

Vocus Network Services

VOCUS

© commander

challenge
NETWORKS

Through our Dodo brand, we also supply electricity and gas to residential customers. The electricity we supply these customers is sourced from the grid via the Australian Electricity Market Operator, and the gas we supply is purchased from upstream suppliers; we do not own any generation or distribution assets.

In FY24, we continued to deploy our five-year investment strategy, including the delivery of major projects that will complete our national fibre backbone and improve the redundancy and resilience of our network, including:

- Project Highclere to complete the Darwin-Jakarta-Singapore Cable (DJSC),
- Project Horizon fibre route from Geraldton to Port Hedland
- North-West Cable System (NWCS) extensions to Timor Leste
- East Coast Cable System between Melbourne, Sydney and Brisbane

Our supply chain

Vocus has a large and diverse global supply chain that we utilise to build and operate our network, support our business operations and serve our customers. We aim to develop strong supplier relationships that create long-term, sustainable value for our customers, shareholders, partners and stakeholders in the community.

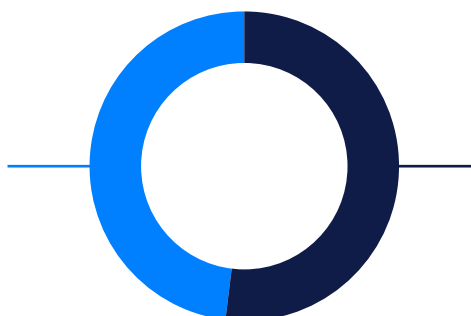
We have two supplier management approaches:

Business unit-managed suppliers

These suppliers are not included in our modern slavery program of work in FY24. During FY25 these suppliers will be integrated and subject to the Modern Slavery Risk Management Framework detailed in this Statement.

Business unit-managed suppliers

Due to the nature of some suppliers, the contracts and supplier relationships are managed out of separate business units for example, carrier and energy suppliers.

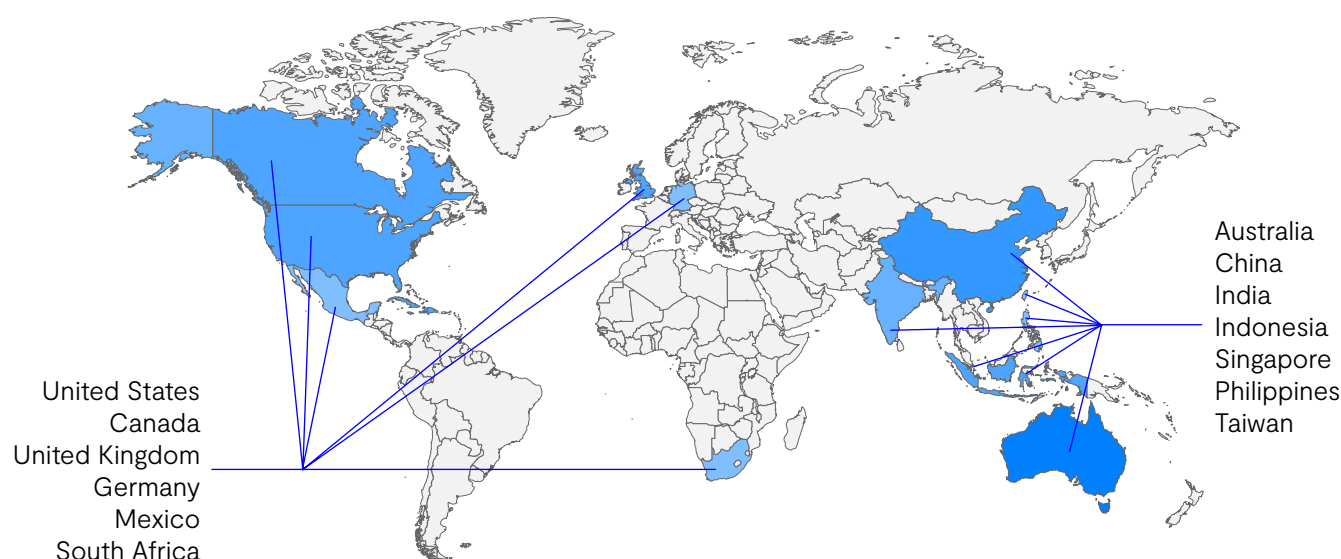


Procurement-managed suppliers

Subject to procurement processes overseen by procurement function. The procurement team supports supplier selection, onboarding processes and ongoing relationship management.

Procurement-managed suppliers

We engage over 1,000 suppliers worldwide, during FY24, 85% of procurement-managed spend was with suppliers located in Australia.



Our procurement-managed suppliers often maintain extensive global manufacturing and supplier networks, and we acknowledge that modern slavery risks within our supply chain will extend beyond the suppliers with whom we directly contract. Notably, source countries for goods we procure include China, India and Taiwan, while services are predominantly provided from Australia, China, India and the Philippines. Recognising these risks is crucial for building a more transparent and responsible supply chain, ensuring that our operations do not contribute to human rights violations.

Our progress

We are dedicated to continuously improving our practices and policies to combat modern slavery. Here is an overview of the progress we have made over the past year:

Each year, we implement a Modern Slavery Action Plan that operationalises our FY23-25 Modern Slavery KPIs, along with any public commitments made within the previous year's Modern Slavery Act (MSA) Statement. Our performance against our KPIs and Action Plan commitments was overseen by the Board Audit and Risk Committee throughout the year. The commitments we made, and our progress against them, are outlined in the table below and throughout this statement.

FY24 Modern Slavery Action Plan Commitments	FY24 Performance
Increase the number of potentially high-risk suppliers that have undergone a modern slavery screening to 100% ¹	●
Increase the number of new suppliers ¹ that undergo a modern slavery screening to 100%	●
Provide targeted modern slavery training to at least 700 Vocus employees, contractors and suppliers	●
Ensure at least 75% of new supplier agreements contain modern slavery risk controls ²	●
Undertake at least four initial supplier site visits / audits	●
● Achieved	

1. In FY24 our definition of a 'potentially high-risk supplier' has been broadened to include procurement-managed suppliers (regardless of spend) in all potentially high-risk categories that have not previously been screened and considered low-risk; as well as any suppliers that have been previously screened but require follow-up investigation or have moved to a higher risk rating in our third-party risk management platform since our last assessment.
2. This commitment relates to new or renegotiated with contract values of \$50,000 or above and excludes instances where Vocus does not have the ability to negotiate terms of the agreement, such as off-the-shelf software license agreements.

Modern slavery risks

We define ‘modern slavery risks’ as the potential for our business to cause, contribute to, or be directly linked to modern slavery, in line with the UN Guiding Principles on Business and Human Rights. The nature and extent of modern slavery means there is some inherent risk of its presence in the telecommunications industry’s operations and supply chains; for example, in the working conditions of some contracted labour or the manufacturing and distribution processes of some products.

Risk assessment

To better understand our potential modern slavery risks, we continue to enhance our processes for risk identification, analysis and assessment. This year, we refreshed our detailed risk analysis, pinpointing where the risks are most likely to arise across our operations and supply chain. We referenced recognised modern slavery risk factors, including high-risk sectors and geographies.

Modern slavery risk areas



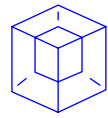
Geographic

Some countries are at higher risk of modern slavery practices due to weak governance and rule of law, conflict, corruption, displacement, state failure to protect human rights, migration flows and socio-economic factors like poverty or widespread discrimination.



Sector or industry

Some sectors are recognised as high-risk globally and include electronics, ICT sector, cleaning and apparel and in Australia, the construction industry.



Product and service

Including labour intensive work, the use of base-skilled contractors, or reliance on migrant workers.

Our understanding of these risk factors and categories was informed by reference to multiple sources of information, including media reporting and resources made available by organisations that include The Global Slavery Index, the Freedom House List, KnowtheChain, Global Contact Network Australia, Australian Human Rights Commission, ILO 2022 List of Goods produced by Child or Forced Labor, Transparency International 2022 Corruption Perception Index, OECD Fragility Index, and Home Affairs’ Addressing Modern Slavery in Government Supply Chain Toolkit.

Identified modern slavery risks in our operations

Vocus acknowledges the potential exposure to modern slavery risk within our operations. However, we consider the risk of our direct employees being subject to modern slavery to be negligible. We have made this assessment on the basis that our direct employees are highly skilled, work within a mature regulatory environment and undertake largely office-based roles. Our direct employees are based in Australia and are provided with contracts that comply with relevant Australian employment legislation and are supported by established, embedded policies and processes to ensure a safe and fair working environment. We are focused on creating an environment where our people can grow and thrive.

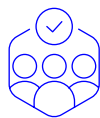
Given the nature of our business and the location of our operations, the most significant risk from an operational perspective lies with our contracted workforce in Manila, Philippines. Further information on how we manage this risk is provided on page 13 of this statement.

High-risk business operations and business models



Business outsourced services

Vocus has a service agreement in place that outsources inbound and outbound sales teams, customer service, technical support, provisioning and credit control services to an offshore business partner in Manila, Philippines. Vocus has identified that this workforce are at higher risk of potential modern slavery practices based on their geography, and vulnerable populations.



Contingent workforce

Vocus’ contingent workforce is comprised of full-time and part-time maximum term contract workers who provide services at times of high demand.

Vocus’ contingent workforce is comprised of both highly skilled specialists and base-skill workers. Base-skill workers can be at higher risk of modern slavery due to increased vulnerabilities.



Customers

Vocus' core business involves providing telecommunications services to customers. If any of our customers engage in practices resembling slavery, Vocus could be associated with these practices through the provision of our services. There is also a potential for relationships with individuals or entities involved in modern slavery practices within their operations or supply chains, particularly when we have limited insight into an entity's business model.



Memberships and associations

Vocus participates in several business associations to collaborate, build relationships, and support industries. However, these memberships also pose a risk of association with modern slavery if third parties are high-risk and lack due diligence.

Identified modern slavery risks in our supply chain³

Vocus recognises the inherent risks of modern slavery present in our procurement of goods and services. The nature and extent of modern slavery means there is some inherent risk of its presence in the telecommunications industry's supply chains. We have assessed that our procurement of Network and IT equipment, products and services relating to the construction and maintenance of telecommunications networks, as well as cleaning services, represent potentially higher-risk categories for our business.

While our activities relating to network construction, maintenance, and cleaning services are based in Australia, which is considered relatively low-risk in terms of modern slavery, we acknowledge that workers in these sectors might still be vulnerable to exploitation. The following table outlines our prioritised higher-risk categories:



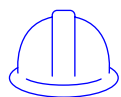
Network and IT equipment

Equipment used to operate Vocus' networks and systems
Sector and industry risk
Geographic risk



Cleaning services

Workers in the cleaning services industry can be from populations with heightened vulnerability to modern slavery, including low-wage workers and workers from migrant, low socio-economic, or culturally and linguistically diverse backgrounds.



Network construction and maintenance

We recognise that workers in the construction and maintenance sectors can be particularly vulnerable to exploitation due to factors such as the high demand for low-skilled labour force, tight project deadlines, and the complexity of monitoring long and intricate supply chains. To address these risks we have implemented a rigorous system for onboarding and establishing safety standards with our contractors.

All contractors, including their workers and subcontractors, must comply with Australian National Employment Standards. Additionally, they are required to complete online workplace, health, and safety (WHS) induction and refresher training. We conduct monthly audits of our contractors to ensure adherence to WHS standards and to evaluate their performance.

Our risk analysis identified that modern slavery risks could also arise in other areas of our supply chain that may not be as material with respect to our spend, including: marketing merchandise, garments and personal protective equipment, catering services, waste management, physical security services, transport and solar panels. These risks arise from involvement of base-skilled workers susceptible to exploitation or goods and services originating from high-risk countries.

To manage and mitigate these potential modern slavery risks, we have implemented a range of programs and procedures to ensure adherence to the labour management standards we expect.

3. Procurement-managed suppliers only

Modern slavery risk management framework

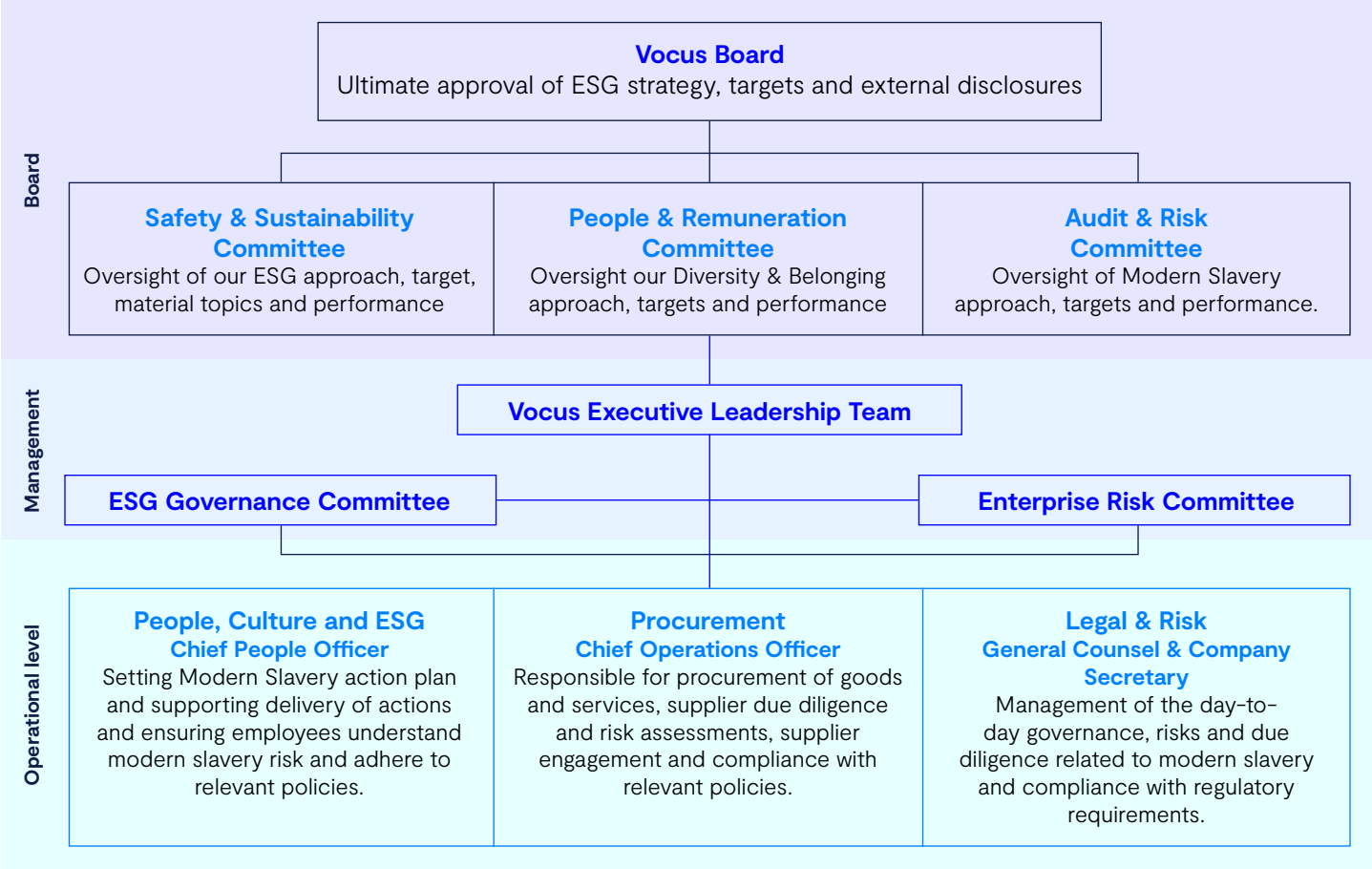
Governance Framework

We have established a comprehensive framework of Corporate Governance policies that apply to all Vocus directors, executives and employees. The policies particularly relevant to modern slavery include our Human Rights Policy, Code of Conduct, Supplier Code of Conduct, Procurement Guidelines, Grievance Policy and Whistleblower Policy. These policies are designed to maintain integrity and confidence in Vocus and appropriately safeguard the reasonable expectations of our key stakeholders. They outline the standards we expect of our people and our suppliers.

Board oversight and management responsibility

The Vocus Board of Directors is responsible for approving related Corporate Governance policies and our annual Modern Slavery Act Statement. The Board Audit and Risk Committee oversees our modern slavery approach and performance, ensuring that modern slavery risks are assessed and managed in line with our enterprise-wide Risk Management Framework. Further details on our Risk Management Framework can be found in Vocus' ESG report, available on our website.

At an operational level, the Chief Operating Officer, Chief People Officer and General Counsel & Company Secretary manage the day-to-day governance, risks and due diligence related to modern slavery. The Chief Operating Officer is specifically responsible for the procurement of goods and services.



Policies and procedures

Our Human Rights Policy includes a specific commitment to not tolerate modern slavery practices in any form in our operations or supply chain, such as child labour, forced, bonded or compulsory labour. Our Human Rights Policy also highlights that we expect our suppliers to demonstrate respect for human rights, by meeting the expectations set out in our Supplier Code of Conduct. The Policy encourages reporting of any human rights concerns. Reports can be made using internal reporting channels, as well as in accordance with our Whistleblower Policy. Our Human Rights Policy is publicly available on Vocus' website, as well as via our internal communication platforms and company intranet.

Our Code of Conduct sets expectations for fair, ethical behaviour that is consistent with our values and in accordance with all laws and regulations relevant to our operations.

Vocus' Supplier Code of Conduct sets out our minimum standards and expectations for all suppliers with whom we do business. It outlines these expectations with reference to human rights and labour practices, as well as modern slavery, and specifically requires that our suppliers "ensure there is no child labour, or forced, bonded or compulsory labour within any part of their business operations or supply chain and that the organisation is in no way benefitting from or contributing to any type of modern slavery". It also provides details on how suppliers can confidentially report concerns about improper conduct in accordance with Vocus' Whistleblower Policy. The Supplier Code of Conduct is published on Vocus' website.

Vocus' Procurement Guidelines sets out our expectations of our people regarding consideration of environmental and social performance in our supply chain and reinforces the requirement for all suppliers and partners to comply with the Supplier Code of Conduct. The Guidelines are published on our internal communications platforms.

Vocus' standard contract terms specifically address modern slavery and are available on our website. The contractual provisions in Vocus' standard Supplier Agreement include an undertaking that the supplier does not engage in modern slavery and requires the supplier to promptly notify Vocus of any incident or allegation that it or any entity in its supply chain has engaged in modern slavery. These standard contract clauses are communicated to suppliers during the onboarding process.

All Vocus employees are expected to understand and adhere to the policies and governance frameworks relevant to their roles, embody our core organisational values, and report any suspected breaches of law or our Code of Conduct.



Grievance mechanisms and remediation

At Vocus, we ensure our people and stakeholders have access to a range of channels, both formal and informal, for raising issues that concern them.

We are committed to providing, or cooperating in, appropriate remediation where we have caused or contributed to adverse human rights impacts. This commitment is set out publicly in our Human Rights Policy. If modern slavery practices were suspected, alleged, or identified in our supply chain, we would first work with our supplier to introduce clearly defined corrective actions, as well as process improvements and preventative measures to be implemented going forward. If a supplier is not open to engaging with us or committed to promptly implementing necessary corrective actions, business with the supplier will be terminated where possible.

Controls are in place to ensure the effectiveness of our grievance mechanisms. The Vocus Board, in consultation with the General Counsel & Company Secretary, undertakes regular reviews of the Whistleblower Policy to ensure it remains appropriate and is operating effectively. Vocus' Chief People Officer undertakes regular reviews of our Grievance Policy and procedure and oversees the Your Say channel. Regular communications are also issued reminding employees of the availability of these feedback and grievance mechanisms.

Our Whistleblower Policy is accessible via the Vocus website and intranet and sets out the various channels through which Eligible Whistleblowers can make a disclosure. Vocus employees, contractors, suppliers, and their families are all defined as Eligible Whistleblowers, as are the employees of Vocus third-party contractors or suppliers. Accordingly, genuine concerns about unethical

conduct within the Vocus supply chain may be reported under the Whistleblower Policy, if other avenues are not successful.

Our Whistleblower Policy affords Eligible Whistleblowers anonymity, confidentiality and protection from detriment, in instances where they are reporting potential wrongdoing or inappropriate conduct. Once a disclosure is received by the appropriate Disclosure Officer, Vocus will investigate whether the disclosure qualifies for protection under the Policy, and whether a formal, in-depth investigation is required.

Our Grievance Policy provides our people, as well as Vocus customers and visitors to our sites, with a formal mechanism to help address and resolve grievances in a way that is fair, reasonable and timely. The Policy is available via our intranet and sets out a procedure by which concerns can be raised, investigated and resolved.

Your Say is an informal mechanism through which team members are encouraged to ask questions, make suggestions and raise concerns directly with Vocus' People and Culture team. All queries are addressed by a member of the People and Culture leadership team.

We undertake fortnightly employee engagement pulse-checks, which is also a mechanism through which team members can anonymously raise concerns. Vocus' General Counsel & Company Secretary and/or Chief People Officer may also occasionally receive ad hoc complaints or grievances directly. When this occurs, they thoroughly investigate any allegations objectively and fairly, and report back to interested parties in a timely manner on the outcome of the investigation.

Due Diligence Processes

We implement thorough due diligence to identify and mitigate potential modern slavery risks as part of our comprehensive Vocus supplier risk and performance management process. This process includes a governance model tailored to each vendor's profile to understand the criticality of their products and services and their potential impacts on modern slavery and supply chain disruptions.

To enhance our due diligence approach, we introduced a new supplier onboarding process using a supplier management tool in January 2023. This tool automates some aspects of our supplier risk assessment, including identifying modern slavery and workplace health and safety risks. All procurement-managed suppliers have been onboarded through this process and have undergone modern slavery screening based on their risk profiles. Additionally, we performed a manual screening of all procurement-managed suppliers, irrespective of their spend, who were onboarded through other channels during FY24.

As many of our supplier contracts do not utilise our standard contract terms, we are working to ensure that we negotiate for modern slavery clauses to be added to contractual agreements with new suppliers, wherever possible. Of the eligible supply agreements that Vocus entered into during FY24, 77% contained modern slavery risk controls, exceeding our target of 75%.

Throughout FY25 we will work to undertake the system and process improvements required to improve on our performance in future years.

Assessing modern slavery risks in our operations and supply chain

100% of potentially high-risk procurement-managed suppliers, as well as all new procurement-managed suppliers to Vocus were subject to a modern slavery screening and risk assessment throughout FY24, providing us with confidence that they have the modern slavery governance and due diligence processes in place to meet our performance expectations, as outlined in our supplier code of conduct.

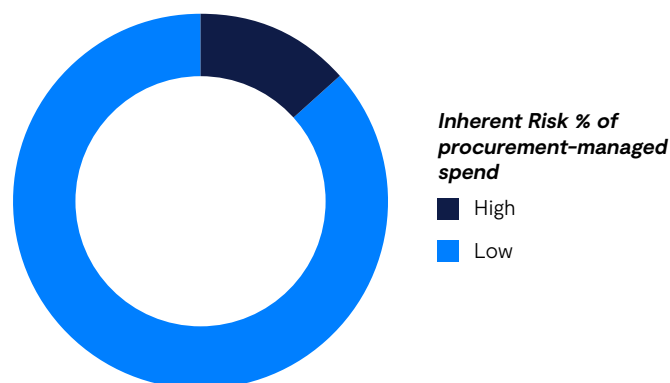
Inherent risk assessment

Our inherent risk assessment is a point-in-time assessment that uses the spend data available in Vocus' procurement systems. Based on industry and geographic risk factors, suppliers were assessed to be either low or high-risk for human trafficking, forced labour and child labour.

By broadening our definition of 'potentially high-risk supplier' to include all procurement-managed suppliers, irrespective of spend, within all high-risk categories that had not been previously screened or were considered low-risk. Additionally, we included suppliers that had been screened before but required follow-up investigations or had shifted to a higher risk rating in our third-party risk management platform since our last assessment.

All active procurement-managed suppliers were added to the third-party management tool for screening and assigned an inherent risk rating.

Among these, 164 procurement-managed suppliers were classified as high-risk and were subsequently requested to complete the Modern Slavery questionnaire.



Modern Slavery questionnaire

Vocus prioritised suppliers for the detailed questionnaire based on a combination of their inherent risk level, criticality to Vocus' business and the value of spend. Criticality and spend were considered in the prioritisation process to determine the business' reliance on and leverage over suppliers. A total of 164 suppliers were selected to complete the questionnaire.

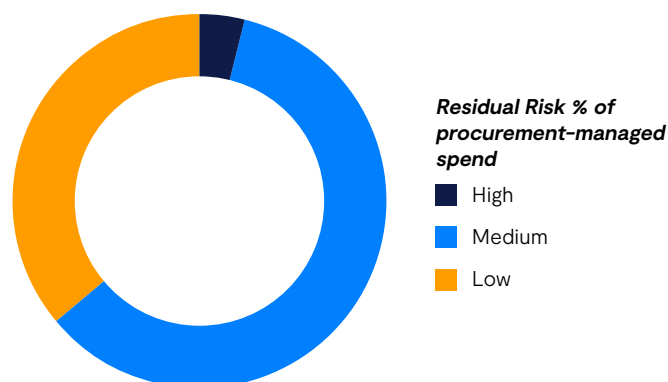
The questionnaire requests detailed responses and evidence of a supplier's modern slavery risk management, due diligence and governance processes. As at 30 June 2024, 86 surveys were completed and some insights are:

- Our highest spend suppliers generally had lower residual risk ratings when compared to lower spend suppliers.
- Only one supplier had no modern slavery risk controls in place, they remain high-risk and will be selected for further assessment in FY25.
- Construction remains the highest risk category due to the nature of work and workforce composition. Smaller suppliers may not have a mature approach, and we will assess opportunities to engage with and support these suppliers in FY25.
- Hardware is the most mature when compared to other procurement categories. This is due to large technology hardware suppliers having strong modern slavery programs in place.
- Half of respondents do not have any modern slavery awareness training. There is an opportunity for Vocus to provide training module to smaller suppliers to improve modern slavery awareness across our supply chain.

Residual risk assessment

Based on the Modern Slavery questionnaire responses and evidence provided supplier risk ratings were adjusted from high-risk to medium or low-risk. Overall the percent of procurement-managed spend with suppliers classified as high-risk has reduced from 14% to 0.3%.

We acknowledge there are limitations to surveys as suppliers may overstate the maturity of their modern slavery controls or omit information about higher-risk worker demographics, operational and supplier locations, or past labour rights violations.



Supplier engagement

Suppliers who remain high-risk following the risk assessment process are prioritised for direct engagement. This engagement elevated modern slavery as a topic with our suppliers, resulting in increasing Vocus' knowledge and awareness of suppliers' unique risk profiles, and increased buy-in from suppliers to progress modern slavery agendas within their own organisations.

Risk assessment	Interviews and site visits	Risk adjustment	Recommendations
Perform an inherent risk assessment and desktop assessment to understand suppliers' risks and controls or residual risk questionnaire.	Conduct supplier interviews to gain further insights on risk and control profile.	Based on information gathered during interviews and site visits, an adjusted risk rating is applied in our database.	Develop recommendations for Vocus and selected suppliers corresponding to risk profile and controls.

Four high-risk suppliers were selected for site visits in FY24. The site visits considered each supplier's inherent and residual risk profile, in addition to supplementary information provided through supplier interviews. The site visits and interviews provided an opportunity to engage directly through a series of questions related to modern slavery and labour rights management, tailored to each supplier.

Based on the supplier risk assessment and findings from the site visits and interviews, we will develop a set of recommendations to improve modern slavery management for both Vocus and the supplier to execute. Set out below are the high-level themes of recommendations, which will be tailored to the supplier's context. Vocus will work with suppliers in FY25 to identify priority recommendations to action.

Modern slavery management recommendations

Commit to modern slavery management	Identify modern slavery risks in the organisation and broader value chain	Assign accountability to key personnel to monitor modern slavery in the organisation	Upskill workers to support the identification and management of modern slavery risks
Establish ongoing management of modern slavery risks appropriate to the organisation	Monitor management program through tracking key indicators	Report modern slavery management activities	Strengthen grievance mechanism and remediation approach

Training and Awareness

To ensure our team is well-informed about their rights and responsibilities, we provide mandatory modern slavery training. This training is essential in equipping our staff with the knowledge to identify and address modern slavery risks. In FY24, we integrated a modern slavery awareness module into our compliance training program, making it mandatory for all employees to complete biennially. The training was rolled out in May 2024 and completed by 1,271 team members, achieving an 89% completion rate.

The module is tailored specifically to Vocus and covers key topics such as the definition of modern slavery, its relevance to Vocus, our primary modern slavery risks, indicators of modern slavery, and how to safely report potential instances within our operations or supply chain. Starting in FY25, this training will also be included in our onboarding process to ensure new hires are promptly educated on this critical issue.

Case study: engagement on modern slavery in practice

A range of functions supporting Vocus' Consumer and Commander businesses, as well as some aspects of Vocus Network Services, are provided by a workforce in the Philippines employed by a third-party business process outsourcing partner. These functions include inbound and outbound sales teams, customer service, technical support, provisioning and credit control.

To ensure the effective implementation of our company culture, values, strategy, and sales practices across our contract workforce, we have a Vocus Country Manager based in Manila and we maintain a close working relationship with our third-party partner in the Philippines. As the employer of our team there, they are responsible for developing and ensuring compliance with all relevant HR policies, in accordance with local laws.

Our third-party partner is committed to action on modern slavery. They have a Modern Slavery and Responsible Procurement Policy and due diligence process to manage potential risks across their operations and supply chain.

Recognising the higher risks for workers not directly engaged by Vocus and based in the Philippines, we undertook a site audit to assess modern slavery risk, encompassing all internal operations and supply chain processes and policies aimed at its prevention. The evidence requested included, but was not limited to, policies that prohibit human trafficking, underage employment, and ensure fair remuneration and grievance mechanisms. Additionally, a representative from Vocus engaged in dialogues with our contract workforce employees, probing their comprehension of the company's policies and procedures.

Engagement observations

- Our Philippines workforce undertakes annual compliance training to ensure they are aware of their rights and responsibilities in the workplace, and specific modern slavery training is included in the new-starter induction process.
- New employees receive face-to-face orientation on policies and processes, with opportunities for questions.
- Workforce has a public commitment to ethical action and must report under Australian modern slavery legislation.
- Employees are aware of wage payment processes, including deductions and payment timings.
- Employees understand the Modern Slavery Policy and grievance processes, with options to contact management or HR.
- The purchasing team manages supplier compliance checks and runs a modern slavery questionnaire annually.
- Multiple reporting avenues are available, including incident reporting, JIRA ticketing, a Whistleblower policy, internal surveys, and a Vocus-specific survey.
- No concerns were found regarding policy clarity and process usage.

In FY25, Vocus will collaborate closely with the Manila workforce to gain a deeper understanding of their supply chain risks, extending our consideration beyond tier one suppliers.

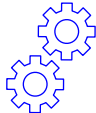
Industry collaboration

We firmly believe that collaborating with our industry peers is essential to developing and sustaining an effective response to modern slavery.

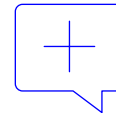
The Telco Together Foundation (TTF) is a not-for-profit organisation within the Australian telecommunications industry that works to drive social change collaboratively. In FY24, we continued our partnership with industry peers through TTF to advance our Industry Statement on human rights and modern slavery. This initiative marks a significant step in our collective efforts to eradicate these practices from our value chain, share best practices, and explore support mechanisms for victims. By endorsing this statement, we reaffirm our commitment to upholding principles based on the UN Guiding Principles on Business and Human Rights:



We acknowledge and respect human rights in our operations and supply chains and understand the importance of identifying and addressing human rights impacts.



We seek to cooperate across our value chain, in areas where we can add more value than working independently; to identify issues, share insights, and continually learn.



We understand the complexity of supply chains and, subject to law, will undertake to share insights, aiming to increase transparency, visibility and facilitate cooperative responses.



We acknowledge the risk of modern slavery and harm to people as a key driver for business action, to be considered along with other risks such as financial, market, operational or reputational risk.



We recognise the importance of working in partnership with our suppliers to mitigate risks, supporting them in their efforts to address modern slavery in their own supply chains.

While collaborating with TTF on a shared supplier screening platform, we faced challenges due to the complexity of maintaining supply chain confidentiality, which led to the project's discontinuation. We remain committed members of TTF's Modern Slavery Roundtables, striving to integrate the UN Guiding Principles on Business and Human Rights throughout our business operations.



Assessment of effectiveness

Our management of modern slavery risks is assessed and managed consistently within our enterprise risk framework. Regular management reporting, oversight by the Board Audit and Risk Committee on our progress against the Modern Slavery Action Plan and Key Performance Indicators (KPIs), along with Board reporting on the status and effectiveness of our governance framework and related Corporate Governance policies, play a crucial role in ensuring the effectiveness of our management strategies.

To further ensure the effectiveness of our risk management approach, we monitor supplier completion rates of our risk-assessment questionnaire and conduct annual meetings with our strategic suppliers at a minimum. These meetings are used to ensure our suppliers' compliance with our expectations regarding modern slavery and to discuss their risk management strategies.

We will define additional effectiveness measures and metrics and report against them in FY25.

Consultation process

Internal consultation

Vocus' General Counsel & Company Secretary, who also serves as the company secretary for each of Vocus' subsidiaries, played a key role in shaping our approach to Modern Slavery. The Modern Slavery Working Group, made up of representatives from Procurement and ESG, led the drafting and review of this Statement. This collaborative effort ensured that various perspectives and expertise were incorporated, enhancing the robustness and relevance of our modern slavery risk management processes.

Throughout the reporting period, Vocus maintained continuous internal consultation regarding our modern slavery statement. This ongoing dialogue extended to the implementation of our broader modern slavery risk management processes. Regular updates and discussions were held to refine our strategies, address emerging risks, and ensure that our practices remained aligned with evolving legal and ethical standards.

External consultation

Vocus engaged with external stakeholders, including industry body, Telco Together Foundation, strategic partners, suppliers and peers to benchmark our practices and incorporate best practices into our framework. This external consultation provided valuable insights and helped us to stay ahead of industry trends and regulatory requirements.

By fostering a culture of open communication and collaboration, Vocus aims to continually improve our approach to managing modern slavery risks, ensuring that our actions reflect our commitment to human rights and ethical business practices.



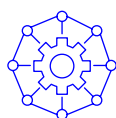
Looking forward

Vocus is committed to addressing modern slavery and protecting human rights throughout its operations. The approach is based on continuous improvement, ethical business practices, and the responsibility to safeguard the rights of individuals in the supply chain. Key areas of focus have been identified, and targets have been set for the coming year to enhance this approach.

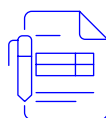
In FY25, our focus will be on delivering against our FY25 Modern Slavery Action Plan Commitments:



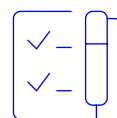
Continue to embed Vocus' commitment to respect human rights across the organisation



Engage with industry to drive both operational and cultural change to reduce instances of modern slavery throughout the telco supply chain network



Continue to assess our operations and supply chain to identify any modern slavery risk factors



Continue to undertake modern slavery screening of all new suppliers



All new or renegotiated supplier agreements contain modern slavery risk controls



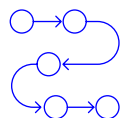
Undertake supplier site visits / audits, where identified as required based on the outcomes of the risk assessment process



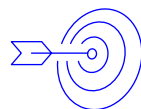
Work with suppliers to investigate potential violation and if substantiated, support supplier to take action to remediate any identified human rights violations or instances of modern slavery



Determine feasibility of providing modern slavery risk awareness training to our suppliers who do not currently have training program in place



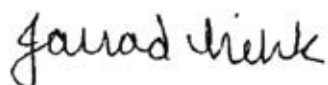
Undertake assessment of Vocus' modern slavery grievance mechanisms against best practice



Define effectiveness measures and metrics and develop framework to monitor and report

Approval

This Modern Slavery Act Statement was approved by the Board of Directors on 5 December 2024 and is signed on its behalf by the Chief Executive Officer and Chair of the Board.



Mr Jarrod Nink
Interim Chief Executive Officer



Ms Penny Bingham-Hall
Chair of the Board

Appendix

Modern Slavery Act 2018 (Cth) reporting criteria

This table outlines where each criteria in the Modern Slavery Act 2018 (Cth) is addressed within this Statement:

Requirement	Reference in this statement
Identify the reporting entity	About this statement, page 2
Describe the reporting entity’s structure, operations and supply chains	Organisational structure, operations and supply chains, page 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	Modern slavery risks, page 7
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	Modern slavery risk management framework, page 9
Describe how the reporting entity assesses the effectiveness of these actions	Assessment of effectiveness, page 16
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation process, page 17
Provide any other relevant information	Looking forward, page 18

