AUSSIE BROADBAND'S MODERN SLAVERY STATEMENT

Aussie Broadband

Aussie Broadband's Modern Slavery Statement

Aussie Broadband Limited (ABN 29 132 090 192) (Aussie Broadband) is 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 2023 to 30 June 2024.

CEO statement

Modern slavery exists in every country, but how it shows up within a country can depend on many factors, including how vulnerable groups are distributed within a population, and the way the government of that country responds to vulnerabilities.

In essence, modern slavery refers to situations of exploitation, where a person cannot leave or refuse the exploitation, due to threats, violence, coercion, or deception.
Exploitative practices include human trafficking, slavery, servitude, forced labour, debt bondage, and forced marriage in serious violation of an individual's dignity and human rights.

The 2023 Global Slavery Index estimates that 41,000 individuals were living in modern slavery in Australia on any given day in 2021. The Asia-Pacific region has the largest number of people living in modern slavery at an estimated 29.3 million.

Aussie Broadband rejects modern slavery in all its forms. This statement outlines the multiple proactive steps we have taken this year, including enabling our staff to have greater awareness and understanding of the risks around modern slavery. This allows our people the opportunity to be more involved in the management of these risks.

This year we also continued to update our supplier vetting processes as well as our ongoing industry collaboration.

We are committed to acting with integrity in all business relationships and respecting human rights for every person. Aussie Broadband has zero tolerance for modern slavery anywhere in our business or supply chain, and we are fully committed to continuous improvement.

We welcome any feedback you might have on the following statement.

FY24 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. The Board of Aussie Broadband Limited approved this statement in December 2024.

Brian Maher
CEO
December 2024

About Aussie Broadband

Aussie Broadband has evolved from a start-up over 20 years ago to becoming a key provider of NBN services across Australia and a publicly listed company on the Australian Stock Exchange in 2020.
In February 2024, Aussie Broadband completed the acquisition of Symbio. In May 2024, Aussie Broadband registered the new subsidiary entity Buddy Telco Pty Ltd, leading to the launch of the challenger brand Buddy Telco.
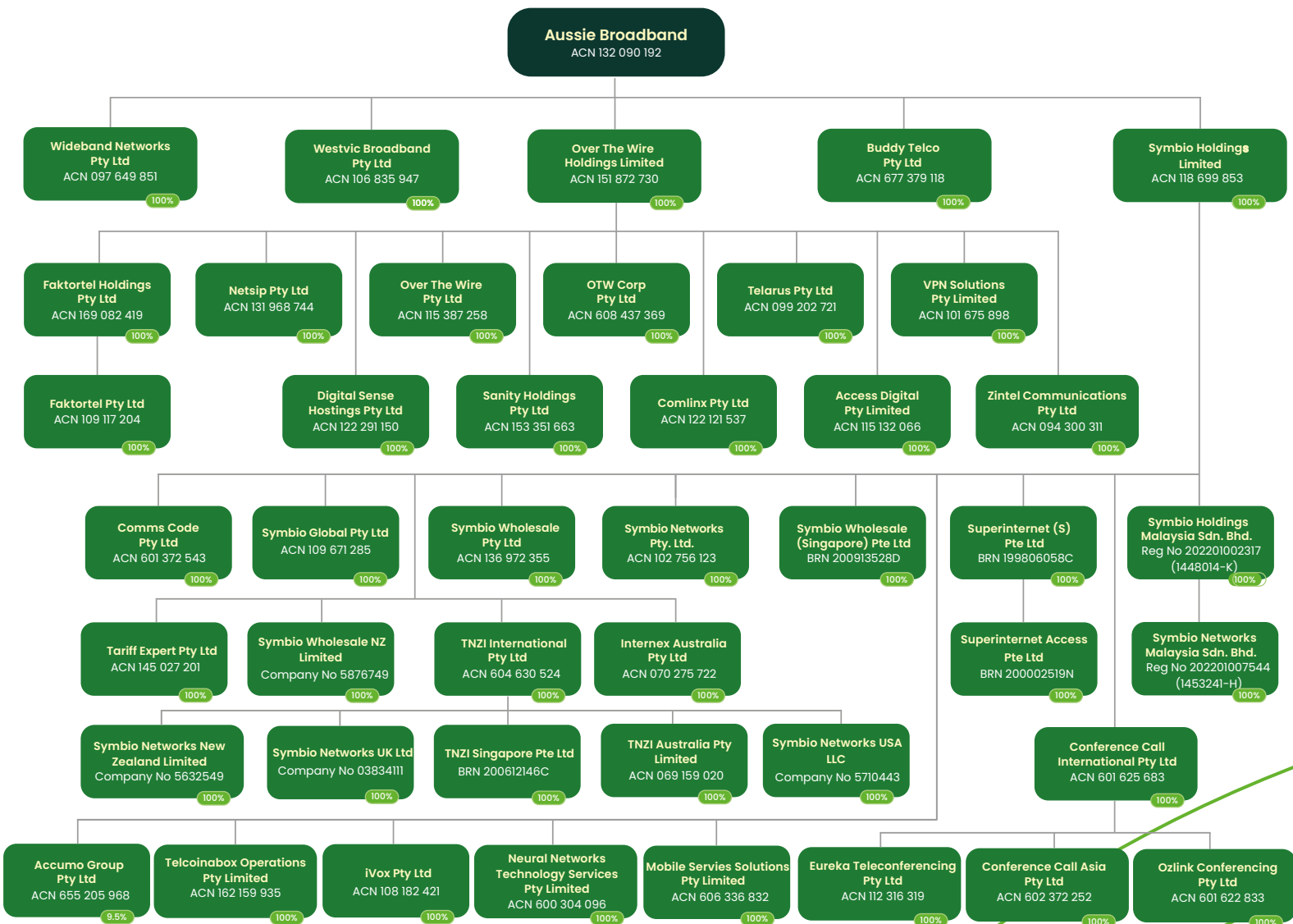A full list of Aussie Broadband's products and services and more company information is available at www.aussiebroadband.com.au and www.symbio.global

Aussie Broadband's structure, operations, and supply chains.

Aussie Broadband is based in Morwell, Victoria, and is one of the largest employers in the Latrobe Valley region. We have additional contact centres in Dandenong South, Victoria and Perth, Western Australia, as well as offices in Adelaide, Brisbane, Darwin, Melbourne, and Sydney. Symbio Holdings Limited is the parent entity of a global group of companies known as Symbio Group. Other entities which form part of the Symbio Group, include Symbio Holdings Limited's Australian, Malaysian, New Zealand, Singapore, US and UK based subsidiaries.

Aussie Broadband Group's organisational structure, as at 30 June 2024:

Aussie Broadband
ACN 132 090 192

- **Wideband Networks Pty Ltd** ACN 097 649 851 — 100%
- **Westvic Broadband Pty Ltd** ACN 106 835 947 — 100%
- **Over The Wire Holdings Limited** ACN 151 872 730 — 100%
- **Buddy Telco Pty Ltd** ACN 677 379 118 — 100%
- **Symbio Holdings Limited** ACN 118 699 853 — 100%

- **Faktortel Holdings Pty Ltd** ACN 169 082 419 — 100%
- **Netsip Pty Ltd** ACN 131 968 744 — 100%
- **Over The Wire Pty Ltd** ACN 115 387 258 — 100%
- **OTW Corp Pty Ltd** ACN 608 437 369 — 100%
- **Telarus Pty Ltd** ACN 099 202 721 — 100%
- **VPN Solutions Pty Limited** ACN 101 675 898 — 100%

- **Faktortel Pty Ltd** ACN 109 117 204 — 100%
- **Digital Sense Hostings Pty Ltd** ACN 122 291 150 — 100%
- **Sanity Holdings Pty Ltd** ACN 153 351 663 — 100%
- **Comlinx Pty Ltd** ACN 122 121 537 — 100%
- **Access Digital Pty Limited** ACN 115 132 066 — 100%
- **Zintel Communications Pty Ltd** ACN 094 300 311 — 100%

- **Comms Code Pty Ltd** ACN 601 372 543 — 100%
- **Symbio Global Pty Ltd** ACN 109 671 285 — 100%
- **Symbio Wholesale Pty Ltd** ACN 136 972 355 — 100%
- **Symbio Networks Pty. Ltd.** ACN 102 756 123 — 100%
- **Symbio Wholesale (Singapore) Pte Ltd** BRN 200913528D — 100%
- **Superinternet (S) Pte Ltd** BRN 199806058C — 100%
- **Symbio Holdings Malaysia Sdn. Bhd.** Reg No 202201002317 (1448014-K) — 100%

- **Tariff Expert Pty Ltd** ACN 145 027 201 — 100%
- **Symbio Wholesale NZ Limited** Company No 5876749 — 100%
- **TNZI International Pty Ltd** ACN 604 630 524 — 100%
- **Internex Australia Pty Ltd** ACN 070 275 722 — 100%
- **Superinternet Access Pte Ltd** BRN 200002519N — 100%
- **Symbio Networks Malaysia Sdn. Bhd.** Reg No 202201007544 (1453241-H) — 100%

- **Symbio Networks New Zealand Limited** Company No 5632549 — 100%
- **Symbio Networks UK Ltd** Company No 03834111 — 100%
- **TNZI Singapore Pte Ltd** BRN 200612146C — 100%
- **TNZI Australia Pty Limited** ACN 069 159 020 — 100%
- **Symbio Networks USA LLC** Company No 5710443 — 100%
- **Conference Call International Pty Ltd** ACN 601 625 683 — 100%

- **Accumo Group Pty Ltd** ACN 655 205 968 — 9.5%
- **Telcoinabox Operations Pty Limited** ACN 162 159 935 — 100%
- **iVox Pty Ltd** ACN 108 182 421 — 100%
- **Neural Networks Technology Services Pty Limited** ACN 600 304 096 — 100%
- **Mobile Servies Solutions Pty Limited** ACN 606 336 832 — 100%
- **Eureka Teleconferencing Pty Ltd** ACN 112 316 319 — 100%
- **Conference Call Asia Pty Ltd** ACN 602 372 252 — 100%
- **Ozlink Conferencing Pty Ltd** ACN 601 622 833 — 100%

Operations

In FY24 and following the acquisition of Symbio in February 2024, Aussie Broadband extended its operational segments to Retail telcos & Managed Service Providers and Software companies & Global Telecoms with a focus on 'changing the game' through providing high-quality products and customer service. The operating segments are represented below:

- **Residential**: includes services to residential customers, including fixed broadband, telephony, mobile, and other value-added services. The residential segment continues to grow and provide market-leading customer service and user experience.

- **Business**: includes services to small and medium-sized businesses. Services include connectivity, mobile, voice and support services, leveraging our technology and customer service know-how to deliver product offerings and exceptional customer service.

- **Wholesale**: provides white label and wholesale capabilities to offer services (connectivity and voice) to large white label partners across all sectors (e.g., energy, retail, financial) and managed service providers (MSP) with exceptional network and customer service.

- **Enterprise & Government**: provides enterprise and government-grade telecommunication services to large business and government customers. Examples include the following services: connectivity, mobile, voice, managed network, security, and cloud services. In addition, Symbio provides quick and easy access to cloud-based enterprise infrastructure from partners like Microsoft, Cisco and Twilio.

- **Retail Telcos & Managed Service Providers**: provides a marketplace for turnkey telecoms services, enabling small, localised service providers to offer a complete suite of services to their customers.

- **Software companies & Global Telecoms**: provides access to phone numbers, voice call termination and messaging, enabling large software companies and service providers to deliver sophisticated voice services.

- **Support services:** represented by finance, risk and compliance, enterprise IT, marketing and strategy, people and reputation, software and infrastructure engineering. These teams provide core services for Aussie's operations.

Aussie Broadband supply chains

Aussie Broadband has a primarily Australian-based supply chain with an overarching philosophy of buying local first. This objective ensures we avoid or minimise contact with international regions of significant modern slavery risk.

Our supply chain relationships include suppliers from the following sectors:

1. Information, communications, and technology, including:
   a. Voice termination and NBN services
   b. Mobile and MVNO products
   c. Network infrastructure (interconnection, colocation, ethernet access, backhaul, dark fibre, and transmission services)
   d. IT hardware (switches, routers, laptops, phones) and software

2. Facilities Management and Corporate Services:
   a. Office facilities and utilities
   b. Cleaning and waste management
   c. Security services
   d. Office supplies and corporate clothing
   e. Travel and hospitality services

3. Professional and Outsourced Services:
   a. Software engineering and technical support
   b. Corporate and professional services (banking, insurance, financial, taxation, and legal advisory)

4. Marketing and Promotional Services:
   a. Marketing services and merchandise
   b. Printing and promotional goods

Aussie Broadband strives to do business with suppliers with similar values, ethics, and sustainable business practices, including human rights-related ones. Aussie Broadband recognises that as a purchaser of goods and services, its suppliers' business conduct and performance can significantly impact its performance and reputation within its communities.

Aussie Broadband's risks of modern slavery practices in the operations and supply chains

As an Australian-based telecommunications provider, we consider the risk of modern slavery to be low, including after the integration of Symbio and Buddy Telco. In our risk assessment, risks of modern slavery may present in our operations and supply chain from:

1. Technology and Hardware:
   a. Electronics and networking equipment (routers, switches, laptops, phones) often manufactured in higher-risk countries, particularly in Asia.
   b. Challenges in supply chain transparency due to complex manufacturing processes.
   c. Hardware components and raw materials (including fibre) sourced from regions with elevated modern slavery risks.

2. Outsourced Services:
   a. Service providers operating in regions ranked in the middle to high-risk range for modern slavery, including parts of South East Asia and the Indian subcontinent.
   b. Particular attention to providers in countries such as Malaysia, India, Vietnam, and the Philippines.
   c. Facilities management services, especially cleaning services, which are recognized as high-risk due to the nature of work and employment arrangements.

3. Office Supplies and Marketing Merchandise:
   a. Paper products and office supplies, though consumption has decreased due to hybrid working arrangements.
   b. Marketing merchandise, particularly textiles, which carry inherent modern slavery risks in their production.

Employment of direct workers by us and the potential for the Group to cause or contribute to modern slavery risks through its direct employment practices is considered to be an area of low risk.

Aussie Broadband's risk management and compliance management frameworks include and consider modern slavery risks across the entire Group. Any identified risk in our supply chains will be investigated and monitored.

We will report on that monitoring in each successive Statement. The below actions apply across the entire Aussie Broadband Group.

Aussie Broadband's actions against modern slavery

- Aussie Broadband conducts ongoing review of our supply chain to understand how/ if these sectors have the potential to expose Aussie Broadband to modern slavery and human trafficking risks

- We employ our risk management and compliance management framework practices. The compliance management framework is built on the principles of ISO37301:2021, and our risk management framework is built on the principles of ISO31000:2018.

- Due diligence activities include:
  o Adherence to our internal procurement processes.
  o Modern slavery risk assessment of the vendor/ supplier as per the guidance provided by the Commonwealth Modern Slavery Act 2018.
  o Assessment via the modern slavery self-assessment questionnaire endorsed by the Telco Together Modern Slavery Roundtable or supplier surveys.
  o Review of suppliers' own modern slavery statements where available.
  o Verify compliance with industry standards and accreditations via the supplier sustainability platform Givvable.com

- Interviews are conducted as warranted to glean additional information from the vendor/ supplier.

- Aussie Broadband's internal audit team completes independent assessments as required and seek confirmation and evidence from vendors and suppliers.

- Where appropriate, we inform and educate areas for improvement and opportunities with our vendors and their supply chain. This approach allows us to remedy any issues before they become material.

- Where an issue cannot be remedied or resolved, Aussie Broadband may exercise its right to terminate the contract/ engagement.

Identification, analysis, and evaluation of modern slavery risks

Aussie Broadband has implemented a Modern slavery specific risk assessment process to monitor its vendors. The risk assessment is aligned with the Guidance for Reporting Entities provided in the Modern Slavery Act 2018 (Cth), considering:

- Sector and industry risks
- Product and services risk
- Geographic risks
- Entity risks

A risk rating is applied for each key risk indicator, obtaining an overall score with dedicated action to implement to mitigate the risk. As part of the due diligence, entities with a high risk must complete a self-assessment questionnaire (SAQ) regarding modern slavery. Aussie Broadband reviews the completed SAQ and, if applicable, the entity's modern slavery statement.

If concerns are raised, we engage directly with the vendor/ supplier to obtain the requisite data to decide on the next steps. The following steps can include yet are not limited to:

- Undertaking an audit, including their supply chain. This may result in defined actions/ remedies to address by the supplier or a particular entity in their supply chain.
- Undertaking an education campaign with the vendors and suppliers to increase transparency and knowledge of modern slavery risks.
- Terminating the contract.

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

In addition, Aussie Broadband is implementing sustainable supply chain practices, such as:

- Paying suppliers in fair timeframes
- Avoiding undue delays to payments
- Avoiding unreasonable contract variations
- Avoiding shifts to less reputable suppliers

Vetting new suppliers

During this reporting period, we have continued to evaluate relevant new suppliers in line with the Modern Slavery Act as part of our selection criteria and onboarding process. Relevant new (or renewed) supplier contracts include a contractual commitment from suppliers which requires a supplier to do all acts reasonably necessary to ensure that no modern slavery occurs in the supply of the services to Aussie Broadband and to provide information to allow Aussie Broadband to comply with its obligations under relevant laws.

Co-operating with our customers to communicate our actions against modern slavery

We respond to requests to complete supplier surveys at the request of our customers, to support their assessment of modern slavery risks and compliance obligations. This reinforces our monitoring and assessment practices on an ongoing basis.

Our people

At Aussie, we conduct regular assurance reviews of our people and payroll systems. These reviews ensure compliance with awards, individual contracts, and workplace conditions.

Aussie Broadband's purpose is to deliver returns to shareholders while having an overall positive impact on society and the environment

In FY24, we positively impacted almost 220,000 people through our Helping Communities Connect Program, Community Grant Programs, Small Change Big Change initiative, and other activities. This impact was enabled through our Pledge 1% commitment, which is tied to our EBITDA business performance.

We also committed to transition to 100% renewable energy for all owned and operated sites by 2028. And as part of our commitment to reducing our carbon footprint, we completed the solar installation at our main office site in Dandenong South in FY24.

The ESG framework evolved in FY24, as we completed a materiality assessment and identified our pillar themes, headline targets, and flagship initiatives. The 3 pillars of our ESG framework are: empowered people and communities, resilient operations and supply chains, and secure and transparent systems.

These initiatives focus on our continual improvement and provide a framework to support our B Corp commitments.

Materiality

To help inform our considered and transparent approach to ESG disclosure, a materiality assessment was conducted in FY24 to focus attention and resources on the material topics that are of highest importance to our customers, staff, regulators, suppliers, communities, and shareholders.

ESG pillars	Material topics
Empowered people and communities	• Health, safety, and wellbeing • High-quality customer service • Digital inclusion, access, and affordability • Innovative tech solutions for good • Community engagement and investment • First Nations rights, reconciliation, and inclusion • Wages, conditions of work, and rights to freedom • Engaging, developing, and enabling staff • Diversity, equity, and inclusion
Resilient operations and supply chains	• Human rights and modern slavery • Responsible supply chain and sustainable procurement • Energy use, emissions, and climate impact
Secure and transparent systems	• Privacy, cyber security, and data protection • Network resilience and reliability • Ethical business, leadership, and good governance • Product and service innovation • Digital ethics, rights, and responsibilities • Critical infrastructure and disaster response • Competitive practice and consumer protections • ESG transparency and reporting

Aussie Broadband's policies and principles

One of Aussie Broadband's fundamental values is to '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.

The following governance-related documents can assist in managing human rights risk within its business and supply chains:

- Board Charter
- Audit, Risk and Compliance Committee Charter
- People and Community Committee Charter
- Code of Conduct
- Statement of Values
- Securities Trading Policy
- Continuous Disclosure Policy
- Occupational Health and Safety Policy
- Gifts, Entertainment and Hospitality Policy
- Speak Out (Whistleblower) Policy
- Supplier Code of Conduct

Aussie Broadband is a foundational member of the Telco Together Foundation's Modern Slavery Roundtable and is a valued contributor to the telecommunication industry-specific supplier register.

Aussie Broadband's assessment of the effectiveness of these actions

Training

Aussie Broadband delivers modern slavery awareness training for employees with a delegation of authority to enter contracts. The training have a performance monitoring measure implemented to assess its effectiveness. In November 2024, 94.7% of the eligible employees completed the training.

Incident reporting and remediation

In FY24, no incidents related to modern slavery were reported.

Internal audit

As part of our commitment to combat modern slavery and in compliance with the Modern Slavery Act 2018 (Cth), Aussie Broadband has undertaken a comprehensive internal audit of our contract and delegation processes. The audit thoroughly reviewed our Supplier Assessment Questionnaire process and contractual requirements with suppliers.

This ongoing process aligns with our dedication to continuous improvement and ensuring our efforts to eradicate modern slavery remain robust and impactful. We remain committed to transparency and will regularly assess and update our procedures to meet the highest standards in the fight against modern slavery.

Ongoing Modern Slavery mitigation strategies

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

- Additional information on our Community Impact program of work.
- Our continued engagement in industry-wide consultation and collaboration and information/resource-sharing through membership of the Telco Together Modern Slavery Roundtable.

Aussie Broadband's consultation process with any entities

Consultation with the entities we own or control

Aussie Broadband has ensured that each member of the Group has been made aware of the requirements of the Modern Slavery Act and relevant materials have been made available to ensure our approach as outlined in this Modern Slavery Statement is collaborative and well-understood. Through its executive team, Aussie Broadband has consulted with the relevant entities it owns or controls (as defined in the Modern Slavery Act in the development of this statement.

Telco Together Foundation

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 are used to inform Aussie Broadband's procurement and sourcing processes.

Aussie Broadband is engaged with the Telco Together Foundation through:

- Creation of Industry guidelines to help understand what human rights and modern slavery really mean and how they connect to our business, and committing to take action together with our suppliers.

- The participation in working groups.

More information can be found on the Telco Together Foundation website https://telcotogether.org/

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 confidentially. Our feedback and complaint reporting process can also be used to report any problems 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 explore and understand the issue(s) and take appropriate action, which may involve referring the matter to the relevant authorities (in the case of allegations of modern slavery) or engaging with the customer about areas of concern within our organisation.

For further information, please contact:

- Sparsha Padmanabhan, General Manager – Risk, Compliance & Audit, sparsha.padmanabhan@team.aussiebroadband.com.au

- Cameron Foley, Community Impact Manager - for ESG-related information, cameron.foley@team.aussiebroadband.com.au

Appendix one

Mandatory reporting criteria

Modern Slavery Act requirement	This Statement
Identify the reporting entity	Introduction (page 2). About Aussie Broadband (page 2).
Describe the reporting entity's structure, operations and supply chains.	Aussie Broadband's structure, operations, and supply chains (pages 3 and 4).
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Aussie Broadband's risks of modern slavery practices in the operations and supply chains (page 5).
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.	Aussie Broadband's actions against modern slavery (pages 5 to 8).
Describe how the reporting entity assesses the effectiveness of these actions.	Aussie Broadband's assessment of the effectiveness of these actions (page 8).
Describe the consultation process with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Aussie Broadband's consultation process with any entities (page 9).
Provide any other relevant information.	Grievance, Confidential Reporting and Feedback Mechanisms (page 9).