

Modern Slavery Statement

This Modern Slavery Statement applies to Pivotel and its wholly owned subsidiaries: Pivotel Satellite Pty Limited (ABN 81 099 917 398); Pivotel Mobile Pty Limited (ABN 43 116 239 813); and Pivotel Communications Pty Limited (ABN 17 102 274 411). Collectively referred to as ‘Pivotel’.

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Introduction

Pivotel is committed to conducting business ethically, responsibly and with respect for human rights.

We recognise that modern slavery can occur in many forms, including forced labour, human trafficking, debt bondage, deceptive recruiting practices and child labour. We are committed to identifying, assessing and addressing modern slavery risks within our operations and supply chains, and to continuously improving our approach to responsible business practices.

This Modern Slavery Statement (Statement) has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and covers the reporting period from 1 January 2025 to 31 December 2025.

Pivotel is a telecommunications provider operating across Australia, delivering mobile, satellite, internet and connectivity solutions to residential, business and government customers. As part of our commitment to responsible business practices, we seek to work with suppliers, partners and contractors who share our values and expectations regarding ethical conduct and respect for human rights.

This Statement explains the steps Pivotel has taken during the reporting period to identify, assess and address modern slavery risks within our operations and supply chains.

This Statement has been approved by the Board of Directors of Pivotel.

Structure, Operations and Supply Chains

Company Structure

Pivotel Group Pty Limited (ABN 85 102 274 322) is an Australian telecommunications provider operating through a number of wholly owned subsidiaries. The Group's principal operating entities include:

- Pivotel Satellite Pty Ltd – Provides satellite communications, IoT and managed connectivity services.
- Pivotel Mobile Pty Ltd – Provides consumer mobile and internet services.
- Pivotel Communications Pty Ltd – Provides wholesale telecommunications and business communications services.

Collectively, the Group provides mobile, voice, satellite, internet, IoT and managed communications services to residential, business, wholesale, enterprise and government customers across Australia.

Pivotel currently employs approximately 130 people across Australia (and internationally).

Operations

Our principal business activities include:

- Provision of mobile and fixed-line telecommunications services to consumers and businesses
- Design, deployment, and maintenance of telecommunications network infrastructure
- Enterprise and government ICT solutions, including cloud, cybersecurity, and managed services
- Retail operations through 160 dealers in the Pivotel dealer network
- Wholesale telecommunications services to other carriers and service providers

Our operations are primarily based in Australia, with offshore operations in New Zealand and Indonesia.

Supply Chains

Our supply chains are diverse and span multiple tiers. The principal categories of goods and services we procure include:

Category	Examples	Primary Geographies
Network Infrastructure	Routers, switches, cables, towers, antenna systems	China, USA, Europe, Australia
End-User Devices	Handsets, modems, tablets, IoT devices	China, Vietnam, South Korea, Taiwan, Malaysia, USA, Europe
IT Hardware & Software	Servers, data centre equipment, software licences	USA, China
Professional Services	Engineering, construction, IT consulting	Australia
Facilities & Property	Building maintenance, cleaning, security, fit-outs	Australia
Contact Centre Services	Customer support, technical helpdesk	Australia
Logistics & Warehousing	Device distribution, e-waste management	Australia
Marketing & Media	Advertising, print, promotional material	Australia

Our supply chains involve multiple direct suppliers globally. We acknowledge that extended supply chains in the telecommunications industry present inherent modern slavery risks, particularly in relation to the extraction of minerals used in electronic components and the manufacture of devices in high-risk jurisdictions.

Risks of Modern Slavery

Risk Assessment Approach

During the reporting period, the Company conducted a structured modern slavery risk assessment across its operations and supply chains. Our risk assessment considered:

- Country risk — jurisdictions with weak labour protections or governance
- Sector/industry risk — industries known to have elevated modern slavery risks
- Product risk — goods associated with high-risk manufacturing practices
- Business model risk — use of labour-hire, subcontracting, or temporary workers
- Vulnerability of workers — migrant workers, seasonal workers, low-wage workers

Identified Risk Areas

Based on our assessment, we have identified the following key modern slavery risk areas:

Risk Area	Nature of Risk	Risk Rating
Device Manufacturing	Forced labour and excessive working hours in electronics factories in high-risk countries	High
Mineral Extraction	Conflict minerals (cobalt, tin, tantalum) linked to forced and child labour in mining	High
Construction & Infrastructure	Labour hire workers, subcontracting chains obscuring conditions for workers on tower/cable projects	Low-Medium
Retail Dealer Network	Authorised dealers may employ workers on exploitative terms outside direct oversight	Medium
Logistics & Warehousing	Seasonal and casual workers vulnerable to exploitation in distribution centres	Low-Medium

Operations Risk

Within our own operations, we have assessed the following as lower risk due to our direct employment relationships, enterprise agreements, and compliance obligations under Australian law. However, we remain vigilant regarding:

- Labour hire workers engaged through staffing agencies
- Independent contractors, particularly in technical field services
- Workers on temporary visas in any of our domestic operations

Actions Taken to Assess and Address Risks

Policies and Governance

The following policies and governance measures were in place or updated during the reporting period:

- Modern Slavery Policy — establishes the Company's commitment and responsibilities in identifying and addressing modern slavery
- Supplier Code of Conduct — sets out minimum standards for all suppliers, including requirements relating to labour rights, working conditions, and modern slavery
- Human Rights Policy — articulates the Company's commitment to respect human rights consistent with the UN Guiding Principles on Business and Human Rights
- Supplier Management Policy — incorporates modern slavery due diligence requirements into supplier selection and management processes
- Whistleblower Policy — provides safe channels for reporting modern slavery concerns
- Grievance Mechanism — accessible process for workers in our supply chains to raise concerns

Due Diligence Activities

During the reporting period, Pivotel undertook the following due diligence activities:

- Completed a modern slavery risk mapping exercise covering direct supplier categories
- Began issuing modern slavery questionnaires to high-risk and medium-risk suppliers
- Reviewed and updated supplier contracts to include modern slavery obligations and audit rights

Training and Awareness

Pivotel has invested in building internal capability to identify and respond to modern slavery risks:

- Mandatory modern slavery awareness training delivered to employees, including all procurement, legal, and supply chain staff
- Targeted training for senior leadership and the Board on modern slavery governance obligations

Remediation

During the reporting period:

- We did not identify any confirmed instances of modern slavery in our operations or supply chains.
- We have established a remediation protocol to respond to confirmed modern slavery incidents, including supplier improvement plans, escalation procedures, and, where necessary, exit procedures.

Consultation

This Statement was developed in consultation with:

- The Board of Directors
- The Executive Leadership Team
- People and Culture (Human Resources)
- Legal and Compliance

All entities covered by this Statement have been consulted in its preparation as required by section 16(3) of the Act.

Other Relevant Information

We support the Australian Government's commitment to combating modern slavery and will continue to work collaboratively with industry peers, civil society, and government to strengthen our response.

We recognise that modern slavery risk management is a journey and are committed to continuous improvement. We will continue to build on our approach in future reporting periods.

Approval and Review of this Policy

This policy has been reviewed and approved by Pivotel Chief Executive Officer and is reviewed annually to ensure this Policy remains fit for purpose.



Peter Bolger
Chief Executive Officer