

Modern Slavery Statement

2020

amaysim

Introduction

Modern slavery covers a range of exploitative practices that impact people's freedoms including human trafficking, forced or compulsory labour and the worst forms of child labour.

This statement is our first modern slavery statement ('Statement') under the Australian Modern Slavery Act 2018. It sets out our business operations and the areas where our supply chain is most likely to be impacted by modern slavery practices.

amaysim does not tolerate any exploitative practices within its organisation or within its supply chain.

The Statement details our approach, policies and steps taken as part of our commitment to combat modern slavery and protect people human rights and freedoms.

We are committed to ensuring that our people are able to work in a safe environment where their human rights and freedoms are respected.

No person should suffer abuse because we do not have the appropriate mechanisms and oversight in place.

We continue to develop our approach as part of our commitment to improving modern slavery practices within our supply chain and to enhance awareness of best practice.

This statement has been approved by the Board of amaysim Australia Limited on 24 November 2020. The statement has been prepared to report on the financial year 2020 and is made in respect of the Modern Slavery Act 2018.

*Authorised by
Andrew Reitzer
Chairman
amaysim Australia Limited*

Our business

amaysim is an asset-light mobile service provider, focusing on providing simple, transparent mobile plans to the Australian market.

We have operations in two countries: Australia and the Philippines. We currently employ more than 550 people across both regions and have a customer base of over one million people in Australia.

Our head office is based in Australia and this is where the majority of our business activity is conducted. Our office in the Philippines is predominantly our customer service centre, however, there are supporting functions that include finance, legal, human resources and technology support.

As a small company we do not have a dedicated procurement division. Instead, we have a procurement process that is promoted across the organisation. This process is designed to be fair to our suppliers, while ensuring that the necessary steps are taken to understand our suppliers' business and operations.

Our supply chain

As a mobile virtual network operator (MVNO) we do not own any of our own infrastructure and we do not sell mobile handsets. We provide customers with access to mobile services only and are therefore not involved with any material manufacturing supply chains.

We have a wide range of suppliers and commercial relationships spanning from large enterprises to small and medium sized businesses. In the financial year 2020 we owned and operated Click Energy and amaysim Energy. On 30 September 2020, post the financial year end, we sold our Energy business.

Including our Energy business, we used some 1,600 suppliers in the 2020 financial year, with 71 of our suppliers making up 95% of our total annual supplier spend. Of these 71 suppliers, 94% are situated in low-risk countries as defined by the OECD.

The majority of our existing supplier spend is currently in Australia with infrastructure providers that deliver us the ability to provide our customers with access to a telecommunications network. In the 2020 financial year, this also included spend with energy infrastructure providers including wholesale providers and distributors.

Technology platforms and software accounts for another significant area of spend as does the cost of leases.

The remaining expenditure is attributable to services that support the general business operations including marketing; professional services; catering; cleaning; logistics and distribution.

We have conducted a mapping of our significant providers in our existing supply chain (suppliers to our Mobile business) to identify where the high risk suppliers are likely to exist and determine how best to work with these suppliers where action may need to be taken to ensure that we maintain the integrity of our supply chain.

Our mapping approach assesses suppliers on a scale of high, low, low-moderate and moderate. The risk weighting takes into account the location, exposure to the business, level of disruption to business and whether the supplier has their own modern slavery statement or commitment to reducing modern slavery.

The majority of our suppliers are low and low-moderate with a small percentage assessed as moderate. Of those that have been deemed moderate risk, this is in almost all cases the result of the geographical location of that supplier.

The Philippines represents the majority of the supply chain that utilises providers that have been assessed as moderate. Most of the suppliers used by the Philippines have been categorised as professional services suppliers and the exposure to the risk of modern slavery is deemed as low – low to moderate.

Of the small number of suppliers that were deemed to be moderate risk, our focus over time is on working with these suppliers to better understand their supply chain.

We do this through more in-depth due diligence with suppliers that includes a [Supplier Assessment Questionnaire](#) that we are rolling out across our supply chain to better understand the operations and Modern Slavery commitments of suppliers.

Our commitment to eliminating modern slavery

We acknowledge our responsibility to protect human rights and to respect the freedoms of individuals and it is our firm belief that there is no place for modern slavery in our operations or supply chains. Underpinning our modern slavery statement are our policies that include our Code of Conduct, Human Rights policy, Supplier Code of Conduct (SCOC) and our Whistleblower Policy.

Code of Conduct

Our Code of Conduct sets the standards across the business. We expect all employees to act ethically and responsibly and this goes beyond compliance and legal obligations. It involves acting with honesty and integrity.

It also sets out the expectation that as a business we will only deal with business partners who demonstrate similar ethical and responsible business practices.

The Code of Conduct is not limited to employees. It extends to consultants, secondees and contractors of the Company.

It stipulates that our people must conduct themselves with openness, honesty, fairness and integrity. People are expected to treat colleagues, joint venture partners, customers, suppliers, shareholders and anyone else that they come across in their dealings with courtesy and respect.

No form of bullying, harassment or discrimination will be tolerated, and any breaches of this code are to be reported to the Chair of the Audit committee, the Company Secretary or the Company's Auditors.

Any report will be thoroughly investigated and if there is a breach sufficient, we will take remedial action, that may include notifying the appropriate authorities if there has been a breach of the law.

Human Rights Policy

Our Human Rights Policy provides detail on our approach to how we conduct our business in a way that respects the human rights of all people, including our employees, the communities in which we operate, and those working within our supply chain.

The policy ensures that we respect the rights of our workers; all workers including temporary, migrant, student contract, direct (or any other type of worker) are treated with respect and dignity.

The Human Rights Policy aligns with the United Nation's (UN) Guiding Principles on Business and Human Rights and we incorporate the Ten Principles of the UN Global Compact into our policies and procedures one of which is that we do not support or tolerate any form of forced, compulsory or child labour in our operations or supply chain.

We expect our stake and suppliers to be familiar with, and have a commitment to, meeting the high ethical standards with which we operate.

Our commitment to protecting human rights is also supported by the human rights commitments in our Code of Conduct, Diversity Policy, Whistleblower Policy and SCOC.

Supplier Code of Conduct (SCOC)

We promote a culture of transparency, integrity, corporate compliance, action and accountability with all our stakeholders, that includes our suppliers.

We ensure that our suppliers are treated fairly and responsibly and in accordance with our core values of empathy, agility, reliability and simplicity.

We recognise that the nature of our supply chain is far reaching and that our responsibilities in supply chain management extend beyond our own direct operations. Our SCOC outlines our expectations of our suppliers and promotes the conduct of business activities in a safe, equitable and responsible manner.

We launched this code in 2020 and it has been incorporated into our procurement process and distributed to our top suppliers with the expectation that they will also observe the Code in our dealings and in their own supply chains.

We expect our suppliers to comply with applicable international and national laws and standards and uphold the human rights of workers and to treat all workers with respect and dignity. We also expect that suppliers ensure that they comply with applicable aspects of the Australian Modern Slavery Act 2018, the International Bill of Human Rights and other national and international standards.

Whistleblower policy

The whistleblower policy encourages and allows people to disclose misconduct that includes conduct that would be related or part of modern slavery.

The policy ensures that any disclosures are dealt with properly and lawfully while protecting everyone involved in the disclosure from victimisation and detrimental action.

The policy applies to anyone who has or is working for us, including officers and managers, board members, volunteers, suppliers and their employees, work experience students, commissioned agents, consultants, a relative, dependent or spouse of any of the people referred to.

To date there have been no disclosures or reports of misconduct through our Whistleblower policy.

Telco Together Foundation - Australian telecommunications leadership statement on human rights and modern slavery

In addition to the work we have done in our own operations and supply chain we have collaborated with other telco organisations as part of our participation in the [Telco Together Foundation](#) (TTF).

As a group, we have committed to upholding a set of shared principles that draw on best practice standards, which includes cooperation across the value chains to identify issues, share insights and continually learn; to increase transparency, visibility and facilitate cooperative responses; and to work with our suppliers to mitigate risks and support them in their efforts to address modern slavery in their own supply chains.

This approach enforces that we are stronger together and a united and cooperative industry that works together will be the industry that leads the way in eliminating modern slavery from its supply chains.



Procurement and supply chain due diligence

We have a standardised procurement process that must be adhered to by suppliers. As part of the Telco Together Foundation, we have worked cooperatively with a group of other Australian leading telco providers to develop a collective approach to identify modern slavery risks within supply chains and to raise awareness and improve transparency among suppliers and the industry.

This culminated in the development of a Supplier Assessment Questionnaire (SAQ) and Toolkit that is available for everyone in the group,

We have incorporated the SAQ into our procurement process and now request that each new supplier complete the form in its entirety.

We have also distributed the SAQ to our top 20 existing suppliers that accounted for 88% of our supplier payments for the Mobile business in the financial year 2020.

The SAQ aims to determine accurate information in regard to our suppliers' modern slavery practices. The responses to the questionnaire will raise any modern slavery concerns and enable us to work with that supplier to determine the risk and whether it is an issue that needs to be addressed.

As part of our ongoing commitment to eliminating modern slavery practices in our supply chain and to the protection of human rights we have a continuous improvement approach and assess the effectiveness of our approach on an ongoing basis.

We continue to roll out the SAQ across our supplier base and use this data to monitor and update our supplier mapping to better understand the risk associated with our suppliers.

Our continued participation in the Modern Slavery group roundtable that is part of the Telco Together Foundation ensures industry-wide collaboration to tackle modern slavery.

As part of this working group we seek to collectively increase the transparency and identify areas for further due diligence among our supply chains, many of which are shared.

The Group focuses on identifying ethically aligned suppliers and streamlining supplier onboarding and reporting with the objective of increasing the industry's knowledge of supply chains and modern slavery risks and building stronger engagement with suppliers to support addressing risks.

As we continue to collate our SAQs, we gain a deeper understanding of our suppliers and their supply chains and are able to identify areas of the greatest potential exposure and assess and monitor this risk.

It is not our intention to cease working with a supplier, nor to refuse to work with suppliers. Where possible, it is our intention to work with them to help better improve and enhance their practices and address the areas of concern.

Our SCOC sets the minimum requirement that we ask our suppliers to adhere to when working with our business. We expect our suppliers to monitor their own compliance with our code, and we continue to support suppliers in their efforts to manage their compliance. It is important for us that everyone may report concerns about illegal, immoral or inappropriate actions and we encourage our people to report to their manager or through amaysim's Whistleblower policy something they feel is not right.

Grievance mechanism and remediation

We encourage everyone that works for amaysim to report breaches of our Code of Conduct.

There are a number of ways in which people can report a breach. This includes internally to amaysim; to our independent Whistleblower service provider; or to external authorities and entities.

Our Whistleblowing service provider, Your Call, is an anonymous external and confidential reporting service that is communicated to all employees and suppliers.

Your Call acts as the intermediary, providing the means for a Whistleblower to retain anonymity, where desired. Reports received by Your Call are communicated to us and Your Call acts as the intermediary to obtain further information and communicate to the Whistleblower where required.

The Whistleblower Policy also contains further details on how to make a report through an authority and directly to amaysim.

Importantly, anyone who makes a report will be protected against victimisation and detrimental action.

amaysim

ABN 65 143 613 478