



# Optus Modern Slavery Statement 2022



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# About this Statement

This Modern Slavery Statement (Statement) has been made by Singtel Optus Pty Limited and covers the Optus group of companies for the 2022 financial year reporting period (1 April 2021–31 March 2022). The reporting entities covered by this Statement are listed in Appendix Two.

The Optus group of companies is part of the Singtel Group.<sup>1</sup> The Optus group operates through various entities that share the same policies and processes, and the overall activity of the Optus group of companies is overseen by the executive committee management team and the Board of Directors of Singtel Optus Pty Limited.

Accordingly, this Statement is a consolidated description of the actions taken to address modern slavery risks by the Optus group as a whole, and has been published as a joint Modern Slavery Statement in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) (MSA). Throughout this Statement, the terms "Optus", "we" and "our" are used to refer collectively to the entities within the Optus group of companies unless otherwise stated.

This Statement has been prepared by our Sustainability team in consultation with our Modern Slavery Working Group, which includes stakeholders from relevant functions across the Optus group of companies, such as Legal, Procurement, Risk, Internal Audit, People and Culture, Enterprise and Business, Retail and Service. Further information about consultation across the Optus group of companies with reporting entities and owned or controlled entities to prepare this Statement is set out on page 28.

The Board of Directors of Singtel Optus Pty Limited has reviewed and approved this Statement, and it is signed by the Singtel Optus Pty Limited Chief Executive Officer.<sup>2</sup>

We welcome feedback on our Statement at: [sustainability@optus.com.au](mailto:sustainability@optus.com.au)



<sup>1</sup> The Singtel Group is Singapore Telecommunications Limited (Singtel) and the group of companies owned and/or controlled by Singtel.

<sup>2</sup> Singtel Optus Pty Limited has approved and signed this Statement on behalf of Optus Cyber Security Pty Limited (OCS). For the purposes of s16(2)(b)(ii) of the MSA, both reporting entities are part of the Singtel Group and OCS's procurement and operations are serviced by Singtel Optus Pty Limited and its subsidiaries. OCS has been consulted about this Statement as set out in the Consultation section and additional information about OCS is set out in Appendix Three. The Board of Optus Insurance Services Pty Ltd (OIS) also did not approve the Statement, as OIS was sold after the end of the reporting period. The company secretary of OIS during the reporting period covered by the Statement was consulted in the preparation of the Statement. Singtel Optus Pty Limited has approved and signed this Statement on behalf of the other reporting entities covered by this statement as a higher entity under section 14(2)(d)(ii) of the MSA.



# Acknowledgement of Country

Optus acknowledges the Traditional Owners and Custodians of the lands on which we live, work and serve.

We celebrate the oldest living culture and its unbroken history of storytelling and communication.

We pay our respect to Elders – past, present and future – and we strive together to embrace an optimistic outlook for our future in harmony, across all of Australia and for all of its people.

**Artist:** Brian De Vries of the Wiradjuri Kunya people,  
with kind permission of the KARI Foundation







# CEO Message

Optus respects the human rights and freedoms of every individual and believes there is no place for modern slavery in our world.

I am pleased to present Optus' third modern slavery Statement. This Statement outlines our ongoing actions to identify and address potential modern slavery risks in our operations and supply chains and highlights the key steps we are taking to further refine and enhance our response to them.

Having the freedom to make choices in life is empowering and grows optimism. People are at the very centre of our business and we are committed to respecting the human rights of all individuals regardless of who they are, where they live, what they believe, or their abilities.

Our work to manage potential modern slavery risks is core to our people-focused approach. As part of our Sustainability strategy, our 2025 goal within our equity and inclusion pillar is to have 'zero' human rights incidents in our operations and with our major suppliers. I am pleased that in FY22 we did not identify any instances of modern slavery relating to our operations or supply chains, but we recognise this does not necessarily mean modern slavery did not occur, or could not occur in future, in our supply chains. We also appreciate that the telecommunications sector is not immune from modern slavery risks and that we play an important role in taking practical steps to help end modern slavery.

Over the 2022 financial year, we have focused on continuing to enhance our modern slavery response, guided by our refreshed Modern Slavery Action Plan. Among other achievements, we have expanded our supplier due diligence and training programs and developed a response plan to help us respond to any potential future modern slavery incidents or allegations.

**Importantly, we see our work to manage modern slavery risks as part of our wider efforts to respect human rights. Undertaking our first group-wide salient human rights assessment has further enhanced our understanding of potential human rights risks across our value chain, including modern slavery and broader labour rights risks.**

Going forward, we will continue striving to improve our knowledge and strengthen our actions where needed, which includes: updating our existing modern slavery e-learning module, reviewing our current modern slavery contract clauses focusing on suppliers and countries with higher modern slavery risks, and exploring opportunities to work collaboratively with our suppliers to strengthen knowledge sharing and capacity building in order to better manage modern slavery risks.

**Kelly Bayer Rosmarin**  
Chief Executive Officer



# Introduction

Our work to assess and address modern slavery risks in our operations and supply chains is a key element of our commitment to respect all internationally recognised human rights.

As a leading Australian telecommunications provider, we are committed to leading by example through our modern slavery response. We have been a signatory to the [UN Global Compact since 2007](#), which includes a focus on eliminating forced and compulsory labour and child labour. We are also proud to support the 2030 [UN Sustainable Development Goals](#) (SDGs), with one of our priority SDGs including Goal 8: decent work and economic growth. Importantly, Goal 8 includes a strong focus on taking immediate steps to end modern slavery.

During our 2022 financial year, we continued to implement our Modern Slavery Action Plan to further enhance our approach to modern slavery, including as shown in the visual below.

## Key achievements

**1** Undertaking our first salient human rights assessment to inform our understanding of how we could be involved in negative human rights impacts throughout our value chain, including in relation to modern slavery (page 10).

**2** Increasing our visibility of potential modern slavery risks in our supply chains by rolling out a new supplier questionnaire to over 1,200 direct suppliers (page 16).

**3** Further strengthening our internal understanding of key modern slavery risks and risk management tools through tailored training (page 21).

**4** Enhancing our ability to respond to a modern slavery incident or allegation by developing a detailed modern slavery incident response plan (page 25).

We recognise the importance of continuous improvement and this Statement also outlines a number of future commitments, including:

- Updating our existing modern slavery e-learning module.
- Reviewing our modern slavery contract clauses focusing on high-risk countries and supplier categories.
- Exploring opportunities to work collaboratively with selected suppliers for knowledge sharing and capacity building to better manage and mitigate modern slavery risks.
- Engaging with the Australian Government's review of the MSA through collaborative forums, such as the UN Global Compact Network Australia.

## What is modern slavery?

Modern slavery happens when 'coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom'. Modern slavery involves serious human rights abuses and can happen here in Australia, as well as overseas. The International Labour Organization and Walk Free Foundation estimate that over 40 million people around the world are victims of modern slavery.<sup>3</sup>

<sup>3</sup>. This definition of modern slavery is taken from the Australian Government's official guidance material about the MSA.



# Our structure, operations & supply chains

Optus is a leading technology and telecommunications company in Australia.<sup>4</sup> Optus is part of the Singtel Group, a leading global communications technology group of companies which directly, or through associates, has over 770 million mobile customers across 21 countries.

## Our structure and operations

We deliver a comprehensive range of telecommunications products and services, including mobile and fixed line telephony, fixed and mobile broadband services, multimedia entertainment and technology, and converged business telecommunications and applications and solutions to small and medium sized businesses, enterprise and government customers.

Optus is also Australia's largest and most experienced satellite owner and operator, with five satellites currently in orbit providing satellite services across Australia and New Zealand and to McMurdo Sound in the Antarctic.

Our nationwide retail network operating under the Optus brand includes proprietary, franchisee, and licensee stores. Optus stores are located in over 300 locations to provide Australians with easy access to high quality telecommunications services and solutions.

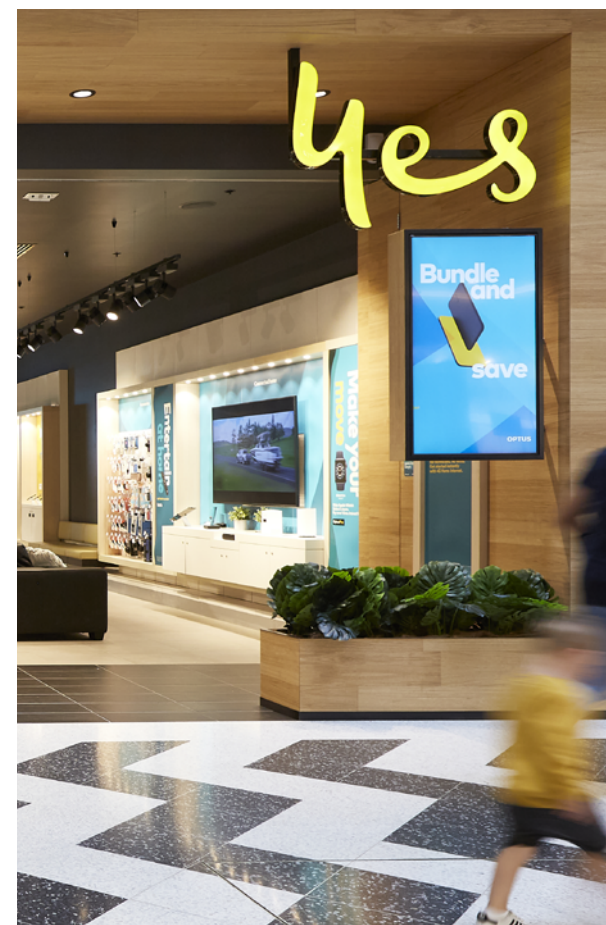
We also service the telecommunications market through our wholesale business, which sells access to our communications network to other telecommunications service providers. In addition, we offer insurance services (for certain types of mobile telecommunications devices), which were

provided by a separate Optus entity during the reporting period (Optus Insurance Services Pty Limited).<sup>5</sup>

We also have agreements with business partners overseas who provide roaming services to our customers travelling outside Australia. In some cases, these roaming services are provided by other entities in the Singtel Group. These agreements are reciprocal, which means we also provide roaming services to our overseas business partners' customers travelling in Australia.

Optus is headquartered in Macquarie Park, New South Wales, and we have offices and retail outlets across all states and territories of Australia, employing more than 7,000 people. Our customer facing business groups are supported by corporate functions including Networks, People and Culture, Sustainability, IT, Legal, Internal Audit, Risk, Regulatory, and Finance.

In addition to the reporting entities set out in Appendix Two, the Optus group also includes a range of smaller owned or controlled entities that support us to deliver our products and services. These entities are primarily incorporated in Australia and include entities which engage Optus staff, perform management and billing services, and provide other support for our operations.



<sup>4</sup>. We primarily operate in Australia but also carry on business in New Zealand, which relates to the provision of satellite services.

<sup>5</sup>. Optus Insurance Services Pty Limited was sold after the end of the reporting period.



# Our supply chains

## Our Supply Chains

We have a large and diverse global supplier base with over 1,200 direct suppliers. Approximately 80% of our procurement spend in the reporting period was in the following categories:

### Mobile Devices

Such as mobile phones and tablets for our customers and employees, wearable devices and equipment installed at sites

### Network and Equipment

Such as equipment to power Optus Network infrastructure including 5G and satellite infrastructure

### Technology Professional Services

Such as partners supporting and delivering IT projects and programs

### Building and Construction

Such as infrastructure investments, including our retail footprint

### Professional Services

Such as strategic and consultancy services

**1,200+**  
Direct Suppliers

**30+**  
YEARS

Operating in  
Australia



Over 300 Optus stores  
(approximately two-thirds managed by partner groups)



98.5% of the Australian population covered by our 4G and 5G Networks

## Our Operations

We are a fully integrated telecommunications provider.

### Our team:



7,000+ team members



600+ contractors within our Australian operations



13,000 external services workers, such as facilities management and contact centre workers

### Our services:



Local, long distance and international, mobile and fixed line voice



Broadband



Multimedia entertainment and technology services



Satellite services



Converged business telecommunications applications and solutions

## Our Customers

We support individual and enterprise customers around Australia.

6. In FY22, Optus Procurement managed 1,284 active vendors.



# Our supply chains

We procure a wide range of goods and services to support our operations. The visual on the previous page details our key procurement categories.

While many of our 1,200+ suppliers are located in Australia, many of these may operate in or source from diverse countries overseas. The map to the right is based on supplier data received through our ethiXbase questionnaire. It shows the countries where suppliers who have responded to the questionnaire are based.<sup>7</sup>

Our suppliers differ significantly in size and our spend with suppliers also varies considerably. These factors mean that the capacity of our suppliers to manage modern slavery risks is not uniform, and can also affect our ability to use our leverage to influence supplier practices.

For example, we have significant spend with a small number of multinational businesses which supply us with electronic devices. However, due to the size of these businesses, we may have limited scope to influence how they manage their modern slavery risks. We are continuing to explore how we can use and build our leverage with suppliers, including by building on key learnings from our ethiXbase surveys (page 16).

Our material supplier spend is overseen by our centralised procurement function. The Optus procurement function supports rigorous sourcing practices to enable suitable suppliers to be considered by Optus.

The procurement team also leads all third-party contracting aligned to the legally approved contracting and risk framework. Engagement of contingent workers is managed by the Optus Talent Acquisition Team under contracts put in place with oversight from procurement.



<sup>7</sup> The data shown in this map is based on supplier responses to the ethiXbase questionnaire and is current as of August 2022.

# Identifying our modern slavery risks

We are committed to respecting all human rights, including the right to freedom from slavery. As part of this commitment, we work to assess and address modern slavery risks throughout our operations and supply chains.

In line with the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) and the Australian Government's guidance about the MSA, we understand modern slavery risks to refer to the potential for a business to cause, contribute to, or be directly linked to modern slavery through its products, operations or services by its business relationships.

We also recognise that modern slavery risks are not static and may change over time, including due to factors such as COVID-19 or geopolitical changes. For example, as outlined on page 18, we are providing ongoing support to workers in our contact centres in response to COVID-19 to help maintain safe and fair working environments.

The key modern slavery risks for the telecommunications sector which we consider may be relevant to Optus is outlined on page 11.

## Understanding our modern slavery risks in the context of our broader human rights risks

Our commitment to respect human rights applies not only to modern slavery, but to all internationally recognised human rights. In particular, for our sector, relevant human rights that we may impact include the human rights to privacy; a clean, healthy and sustainable environment; and children's rights.

During the reporting period, we undertook a salient human rights assessment to enhance our understanding of the areas where we may be at risk of involvement in human rights harm. In line with the UNGPs, we understand our salient human rights issues as those areas where the most severe actual or potential human rights impacts could occur through Optus' activities or business relationships. Severity in this context is understood through the lens of risk to people, rather than risk to our business.

We undertook our salient human rights assessment in partnership with an external specialist business and human rights advisory firm. The assessment involved a collaborative, cross-functional consultation process across our business, including a series of interactive workshops and a desktop review.

Completing the salient human rights assessment has supported us to deepen our understanding of how our actions to manage modern slavery risks align with our broader work to respect all human rights.







# Potential modern slavery risk areas for the telecommunications sector

We recognise that there are a range of potential modern slavery risk areas that may be present in the operations and supply chains of companies operating in the telecommunications sector.

The potential risks outlined on this page may present modern slavery risks where they: involve lower skilled workers such as migrant workers who may be vulnerable to modern slavery; or involve lower skilled contracted labour and high levels of subcontracting; or involve goods or services provided or manufactured overseas in countries with differing legal frameworks and levels of workplace protections.

**We are committed to continually evolving the controls we have in place to manage these potential sector-wide risk areas. Further information about these controls is set out in this Statement.**

## Potential modern slavery risks in telecommunication companies' operations

### **Risk area: Partner groups operating branded retail stores.**

We have an extensive network of franchisee and licensee (partner) group operated stores around Australia, who are responsible for engaging employees. Further information about how we engage with our partner groups is set out on page 20.

### **Risk area: Services provided by workers in offshore contact centres.**

Our operations are supported by employees of our suppliers based outside of Australia. For example, over 4,000 staff located in India and the Philippines provide contact centre services to our customers. Further information about how we engage with our contact centre suppliers is set out on page 18.

## Potential modern slavery risks in telecommunication companies' supply chains

### **Risk area: Contractors building and maintaining telecommunications infrastructure.**

We engage a range of contractors in Australia to build and maintain infrastructure. Further information about our supplier risk management strategy is set out on page 15.

### **Risk area: Contractors providing cleaning, security, waste removal and other property management services.**

We engage a range of contracted service providers to support our operations, including by providing cleaning, waste removal and property management services for our offices and security services for our sites across Australia. Further information about how we engage with our contracted service providers is set out on page 19.

### **Risk area: Procurement of products from suppliers.**

Our risk assessment identified construction and maintenance support equipment; electrical equipment, components and supplies; and electrical wire management devices and accessories as higher risk supplier categories. Further information about how we manage modern slavery risks related to the procurement of products is set out on page 12.





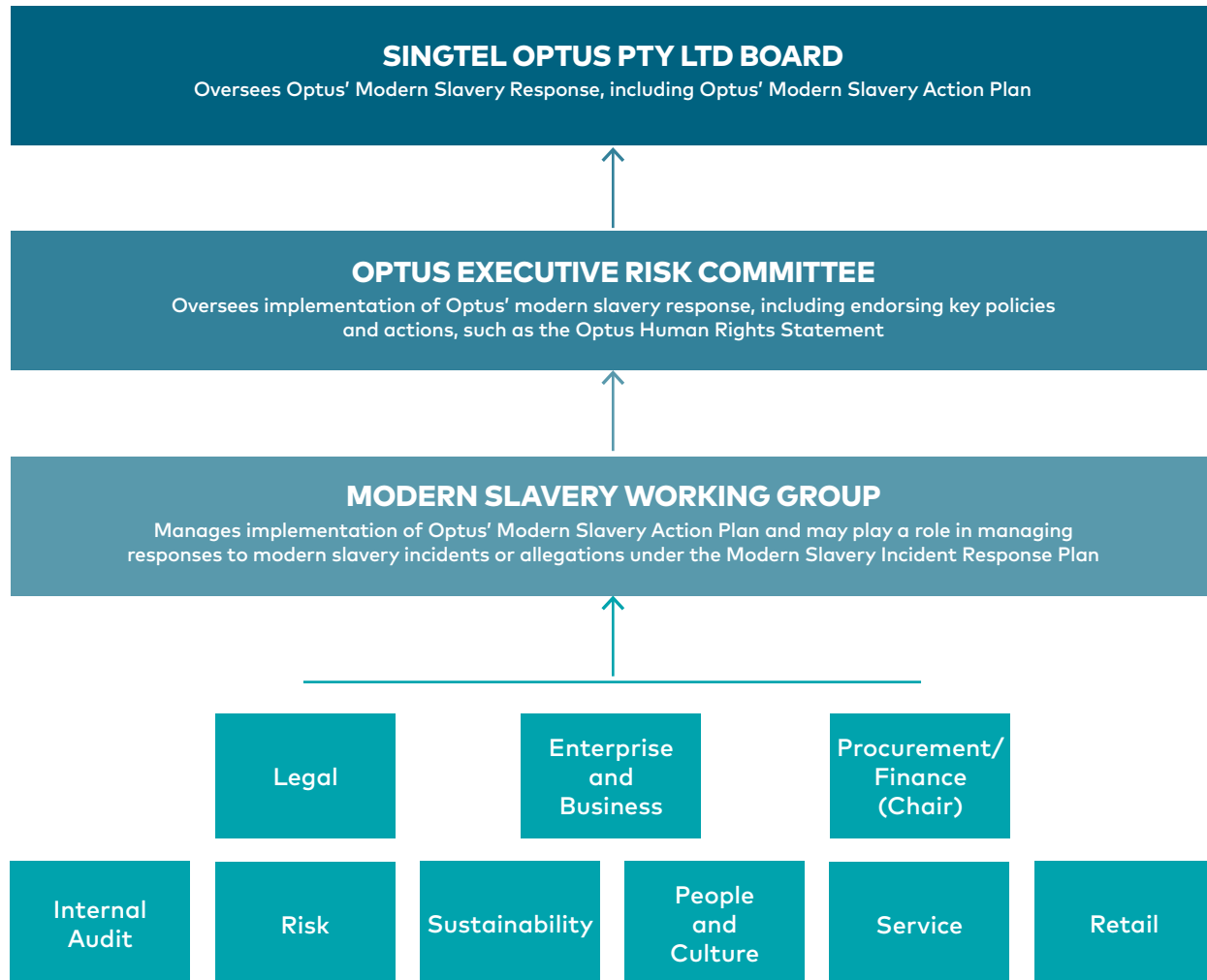
# Policies and governance

Our policies and procedures underpin the way we engage with our people and suppliers, including in relation to issues such as modern slavery.

Policy	How is the policy relevant to modern slavery?	How is the policy implemented?
<b><u>Human Rights Statement</u></b>	Our Human Rights Statement was launched in December 2020 and reinforces our commitment to respect all human rights. It provides an overview of our approach to human rights, the standards we set for ourselves and the expectations for the people who work for us, and on our behalf. The Human Rights Statement specifically sets out our commitment to prohibit child labour and modern slavery in any form.	Our Human Rights Statement is published on our website. Optus has also increased awareness and access to this Statement through our internal communications with links to the Statement.  The Human Rights Statement is also promoted through our annual modern slavery e-learning module.
<b><u>Procurement Policy</u></b>	The Singtel Group Procurement Policy's objective is to ensure all goods and services are acquired via standard process, mitigating risk to Singtel Group companies. As part of this Procurement Policy, we require suppliers to agree to comply with The Singtel Group Supplier Code of Conduct.	The Procurement Policy is published on our Optus intranet. The policy is regularly reviewed and we communicate any policy enhancements and changes across our business.
<b><u>Supplier Code of Conduct</u></b>	The Singtel Group Supplier Code of Conduct sets out the expectations of all suppliers with whom the Singtel Group (including Optus) does business. It includes a specific section on human rights, including modern slavery, which sets out the Singtel Group's prohibition on the use of modern slavery in its operations and supply chains and expectations for suppliers. This includes a requirement for international suppliers to have systems to demonstrate compliance with ILO Conventions on labour standards, the Universal Declaration of Human Rights and the UN Convention on the Rights of the Child. The Supplier Code of Conduct also addresses issues that may be indicators of modern slavery, such as harassment and corruption.	The Supplier Code of Conduct is published on the Singtel Group website. It includes details of mechanisms available to suppliers to report any potential breaches. To do business with Optus, all our suppliers must confirm their acceptance of, and comply with, the Supplier Code of Conduct.
<b><u>Contractual Terms and Conditions</u></b>	We require our suppliers to take reasonable steps to identify and prevent the occurrence of modern slavery offences in their organisation and supply chains, as well as those of any third party with whom they do business. Importantly, our suppliers are asked to notify us upon becoming aware of any modern slavery issue occurring in their organisation or supply chain.	Where appropriate, we discuss these contract clauses with suppliers during contract negotiations. We may also ask our suppliers for access to reports, information and documents, including the completion of a self-assessment questionnaire to assist us in monitoring ongoing compliance with these terms and conditions.
<b><u>Employment Policies and Frameworks</u></b>	Optus is a leading employer and developer of talent in the Australian marketplace and provides a comprehensive framework for employment. This framework is underpinned by industrial instruments approved by the Fair Work Commission and provides minimum terms and conditions of employment for our people beyond minimum statutory legal entitlements. Employee terms and conditions of employment are comprised of Optus' relevant industrial instruments, contracts of employment and employment related policies and benefits, which build on minimum employee entitlements.	Employee contracts of employment provide for, at a minimum, terms and conditions of employment that meet legislative and the relevant industrial instrument obligations. Optus' industrial instruments and policies, which enable and support employee terms and conditions, are also published on the Optus intranet.



# Governance



As the Optus group of companies are wholly owned subsidiaries of the Singtel Group, all key risks, including vendor and supply related risks, are also subject to the Singtel Group Risk Management Framework, including reporting to and review by the Singtel Risk Management Committee and the Singtel Board Risk Committee.

Our response to modern slavery is led by our cross-functional Modern Slavery Working Group, which met regularly during the reporting period. The visual on the left shows how responsibility for modern slavery is incorporated into our governance structure.

During the reporting period, we finalised formal Terms of Reference for the Working Group. These Terms of Reference set out the key responsibilities and expectations for Working Group members, including making it clear members are responsible for progressing modern slavery actions relevant to their business units. We will review the Terms of Reference periodically.





# Our Modern Slavery Action Plan

The Modern Slavery Action Plan sets out key actions for business units across Optus to strengthen our response to modern slavery.

During the reporting period, we refreshed our Modern Slavery Action Plan to develop a series of new recommendations for the current reporting period and the 2023 and 2024 financial years. This included recommendations relating to developing a modern slavery incident response plan and revising our supplier questionnaire process. Our work to implement both these recommendations is set out in this Statement.

To provide clear accountabilities for action, each recommendation in the Modern Slavery Action Plan is assigned to a business unit to progress. The Working Group also tracks the implementation of the plan at its regular meetings.

The Board of Directors of Singtel Optus Pty Limited was briefed on the expansion of the Modern Slavery Action Plan and new recommendations and endorsed our approach. We report to the Board on our progress annually, as part of the development of our annual Statement.

## The role of our Sustainability team

Optus' Sustainability team is responsible for leading and facilitating the implementation of our modern slavery response. The Sustainability team seeks to support and enable change within Optus, including the leading and development of Optus' modern slavery reporting and collaborating with various departments on integrating sustainability priorities and targets within our day-to-day operations.

This approach ensures that the Sustainability team is able to leverage experience working on other key sustainability issues and engaging with internal and external stakeholders in supporting Optus' modern slavery response. This also enables us to identify opportunities to maximise impact, such as by utilising modern slavery risk management activities to also progress other sustainability priorities. For example, in addition to modern slavery, our ethiXbase surveys include targeted questions on topics such as impacts on Indigenous peoples and other human rights issues, and anti-bribery and corruption.

Importantly, the Sustainability team is also responsible for Optus' broader work to respect human rights, including the Optus Human Rights Statement. This supports the team to integrate our modern slavery risk management with our wider work on human rights, including through processes such as our salient human rights assessment.



# Due diligence

Optus delivers a diverse range of telecommunications services and has a complex supply chain spanning different industries and multiple suppliers.

We remain committed to continuously strengthening our understanding of potential modern slavery and other human rights risks relating to our operations and supply chains. We also value dialogue with our corporate customers and regularly respond to customer requests for information about our modern slavery approach. For example, during the reporting period we responded to requests for information about our modern slavery response from customers in a range of sectors.

## Our supplier risk management strategy

Our supplier risk management strategy begins as part of the sourcing and onboarding process during the pre-qualification phase and extends through to an ongoing risk assessment. These assessments cover all suppliers who want to do business with Optus and, in addition to modern slavery risks, they also cover anti-corruption, bribery and other aspects of business integrity. These broader issues, such as corruption, can serve as 'red flags' for modern slavery risk.

As part of our existing supplier onboarding process, all new and existing suppliers must undergo a detailed supplier assessment process. The screening and supplier assessment process involves cross-functional collaboration with key stakeholders from across the business. Depending on the size, scale, and risk profile of the supplier, the level of the screening will vary, particularly for higher-risk categories.

We also have additional measures relevant to modern slavery in place for certain suppliers and business partners. The case studies on the following pages explain how we are engaging with key suppliers to support our efforts to understand and manage modern slavery risks.





# Supplier questionnaires

We recognise that continuing to build our understanding of our supplier base is key to informing our ongoing work to identify and manage modern slavery risks in our supply chains.

As outlined in our FY21 Statement, a key focus area for Optus has been exploring options to further refine our supplier questionnaire process. During the reporting period, we enhanced our supplier due diligence processes by rolling out a questionnaire to over 1,200 of our direct suppliers through ethiXbase. This includes suppliers in key sectors that can carry higher modern slavery risks, including facilities management and devices. Tailored to Optus, the questionnaire is focused on modern slavery and responsible supply chain management and includes 21 questions (a number of which have multiple sub-questions).

Our suppliers are currently responding to the questionnaire, and we are closely monitoring results and key reporting trends. We also understand that while the results can help us to understand overarching trends and potential capacity gaps, every supplier is different and our supplier engagement also needs to take into account the particular context and circumstances of each supplier.

To date, the automated risk rating generated through the questionnaire responses indicate that the majority of our suppliers have a lower risk profile. A small number of suppliers have been identified as higher risk based on their questionnaire responses. The high-risk ratings for these suppliers reflect a number of factors, including the sectors in which these suppliers operate, the countries they operate in or source from, and the level of due diligence undertaken by these suppliers to manage potential modern

slavery risks. Optus does not currently actively source from the higher-risk suppliers identified to date. Going forward, we are considering options for engagement with categories of suppliers that may represent higher risks.

Importantly, the questionnaire results suggest that most suppliers are taking steps to manage modern slavery and broader human rights risks, such as training. However, the results suggest that some suppliers may not be integrating their work to manage modern slavery risks with actions to manage wider human rights risks. For example, only 28% of suppliers that have responded to the questionnaire have undertaken a human rights impact assessment.

We are continuing to engage with our suppliers to support them to complete the questionnaire and understand our expectations. For example, a number of our suppliers have discussed the questionnaire with us.

Further information on key results from the questionnaire is set out on page 17.

Our work with ethiXbase complements our broader work to develop our new Supplier Lifecycle Management Framework, which aims to enhance our supplier risk management. As part of this new framework, we have introduced new systems and a Supplier Management Centre of Excellence and Governance team within Optus Procurement, which will help support the digitalisation of our modern slavery risk assessment and controls going forward.

## Examples of questions we ask suppliers

The ethiXbase questionnaire asks suppliers to respond to a range of questions related to their response to modern slavery.

These include questions relating to: suppliers' due diligence processes; where suppliers produce the goods and services they supply to Optus; what training is provided to workers; whether suppliers have undergone human rights audits; and whether suppliers are themselves covered by any modern slavery reporting laws.





# Supplier modern slavery questionnaire

During the reporting period, we implemented a modern slavery questionnaire for over 1,200 of our key suppliers using ethiXbase. We are using the results to inform our ongoing engagement with suppliers on modern slavery.



**1,200+**  
surveys shared  
with suppliers



Majority of moderate  
and high-risk suppliers  
**located in Australia**



**17% of suppliers** required to report under modern slavery laws



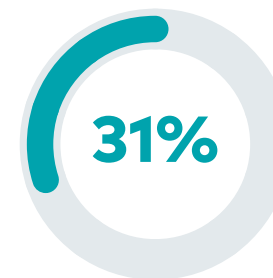
**38% of suppliers** have implemented controls or written policies or codes on human rights



**41% of suppliers** undertake due diligence on their suppliers relating to modern slavery risks



**28% of suppliers** have undertaken a human rights impact assessment



**31% of suppliers** have trained at least 80% of their workforce on human rights related issues



**63% of suppliers** have a mechanism to anonymously raise concerns about working conditions

**Note:** The data referenced in this visual is based on responses to completed questionnaires received from suppliers as at 24 August 2022. Data relating to suppliers that have not yet completed the questionnaire is not reflected in this visual.



# Ongoing support for our contact centre workers during COVID-19

We work closely with our third-party contact centre suppliers in India and the Philippines to help provide a safe and fair working environment for their over 4,000 employees in these centres.

We understand that the impacts of the COVID-19 pandemic have increased the vulnerability of workers in global supply chains to human rights impacts, including modern slavery and other labour rights issues. We also recognise that unsafe or substandard working conditions can be enablers for more serious exploitation, such as modern slavery.

During the reporting period, we continued to provide support to offshore contact centre workers, such as moving to working from home arrangements in some circumstances. We also provided financial support for 'wellness packs' for relevant workers in quarantine and support for some COVID-related medical expenses.

Following the end of the FY22 reporting period, our Optus site directors and other relevant team members have also resumed in-person visits to our contact centre sites, which were suspended due to COVID-19. This provides us with valuable opportunities to better understand the context on the ground.

More broadly, we continue to engage with our contact centre suppliers through quarterly surveys, periodic virtual events and targeted sessions with contact centre workers to seek their direct feedback. Further information about these ongoing engagement activities is set out in our FY21 Statement.

## **Inclusion of modern slavery questions and clauses in panel selection process for device suppliers**

We maintain a Home Device Panel of approved suppliers for home devices, such as modems. All our Panel partners have agreed to our standard contract clause relating to responsible supply chains and human rights without amendment.

In FY23, we expanded on this work by including a series of modern slavery questions in panel selection documentation for a new panel for 5G service providers. This includes questions relating to modern slavery risk management and grievance mechanisms. We will report in more detail on this activity in our FY23 statement.



# Engaging with our facilities management providers

We work closely with our facilities management providers, including to help promote safe and fair working environments for facilities management staff on our sites.

## Cleaning and other facilities management

BGIS is currently contracted to manage and deliver Optus' facility management services across all facilities nationally. This includes services such as cleaning and waste management, landscaping and garden maintenance, and general handyman services.

Our contract with BGIS includes a modern slavery clause, including a requirement for BGIS to notify us of any potential modern slavery incidents in its operations or supply chains. Additional information about this contract clause is set out in our FY21 statement. BGIS has also advised Optus it maintains a reporting hotline and anonymous online reporting tool to allow for the safe reporting of concerns relating to illegal or unethical conduct, such as modern slavery.

We work closely with BGIS to monitor compliance with relevant contractual obligations, including through monthly reviews and quarterly senior management meetings. Among other steps to manage potential modern slavery risks, BGIS undertakes annual audits of subcontracted providers to verify they are paying their workers appropriately. BGIS' audit for the 2021 calendar year did not identify any concerns in relation to subcontractors servicing Optus sites. We also require BGIS to provide us with a monthly statutory declaration confirming workers have been paid in accordance with relevant awards.

## Security services

We also engage security services providers, such as Securitas and First Contact. Our contracts with these providers also include modern slavery clauses. Both Securitas and First Contact have also advised Optus they have processes in place to allow subcontracted workers to safely report any concerns relating to illegal or unethical conduct, such as modern slavery.





# Case study

## Engaging with our franchisees and licensees

We recognise that franchisee and licensee arrangements in some sectors may involve risks relating to worker exploitation. At Optus, we have a range of protections in place to safeguard the integrity of our engagement with our franchisees and licensees (Partners), many of whom are long-term partners with us.

As described in our FY21 statement, these protections include financial and probity checks for prospective partners and setting clear standards for Partner conduct through our franchise and licensee agreements, including compliance with relevant laws and work, health and safety requirements. We also have monthly and quarterly performance meetings with our Partners, as well as annual reviews. This engagement helps us to maintain a high level of visibility of Partners' businesses which assists us to identify and manage any potential compliance issues.

We are also working with our Optus-branded distribution partners and franchisees to support their compliance with all applicable laws, including payment of all employee entitlements owing, including through the use of periodic reviews.

In addition, our Partners and their employees have access to the Optus Whistleblower Hotline, which offers a place to report any unethical and inappropriate conduct or concerns, including any potential complaints related to modern slavery.

More broadly, potential modern slavery risks in procurement undertaken by our Partners are primarily managed through Optus' supplier risk management framework. Partners must use Optus approved suppliers for accessories and are required to source devices directly from Optus. We also manage fit-out and installation work for Partner stores. Partners' staff are also responsible for in-store cleaning and our Partners do not use third-party cleaning providers for regular routine cleaning activities.



# Training

Following the launch of our dedicated modern slavery e-learning module in 2021, we delivered a targeted training session to key Optus staff. We also included a training session on modern slavery as part of the 2021 Singtel Learning Fiesta.

## Training was a key area of focus for Optus over the reporting period

### e-learning module

Our modern slavery e-learning module includes information about:

- What is modern slavery
- Modern slavery indicators
- How modern slavery can be present in businesses' operations and supply chains
- What to do if you have any concerns

Completion of this module is required learning for all Optus leaders and all staff in certain business units, such as Procurement. The training is also available to all other Optus staff, including retail and franchisee store owners.

### Targeted training

In July 2021, we partnered with an external specialist business and human rights advisory firm to deliver a two hour targeted training session on modern slavery to over 100 Optus team members. Optus participants included representatives from key functions including Sustainability, Risk, Devices, Legal, and People and Culture.

The training session was tailored to Optus and included guidance about:

- How modern slavery can occur in global supply chains
- The Australian Modern Slavery Act and the UNGPs
- Modern slavery risks in the telecommunications sector
- Modern slavery red flags and indicators
- How to respond to a possible modern slavery incident or allegation (including a hypothetical modern slavery scenario)
- Optus' response to modern slavery

At the conclusion of the training, 80% of respondents said the training had significantly improved their understanding of modern slavery and how this issue is relevant to Optus.

### Singtel Learning Fiesta

In September 2021, we delivered a one hour webinar on modern slavery as part of the annual Singtel learning fiesta. This session was attended by over 100 participants from across the Singtel Group.

The theme for the webinar was 'Understanding modern slavery: What is it, why is it relevant to our businesses, and how can our businesses respond?' The session focused on how modern slavery risks are relevant to the telecommunications sector; modern slavery red flags; and how to manage possible modern slavery risks and respond to incidents or allegations. It also provided an opportunity to share Optus' work to manage modern slavery risks with the wider group.



# Collaboration

We see collaboration with our business peers and other stakeholders as key to building and maintaining a strong response to modern slavery. During the reporting period, we continued to contribute to the development of collaborative, business-led responses to modern slavery through three key forums.

## UN Global Compact Network Australia Modern Slavery Community of Practice (UN GCNA)

As a signatory to the UN Global Compact since 2007, we are committed to upholding its 10 principles including human rights and labour issues. As part of this commitment, we actively participate in the UN GCNA, including its Modern Slavery Community of Practice.

The Modern Slavery Community of Practice is a small, interactive forum with membership from a range of Australian businesses and meets quarterly. It aims to provide a collaborative forum to support Australian businesses to manage and communicate modern slavery risks and develop good practice responses.

Optus' membership of the Modern Slavery Community of Practice has helped us to better understand various other industry sector practices, challenges and learnings. During the reporting period, we participated in Community of Practice events focused on issues such as remediation.

## Telco Together Foundation

Optus is a founding member of the Telco Together Foundation (TTF), a unified industry network that brings together 21 of the leading telecommunications organisations operating in Australia. We continued to work collaboratively with TTF through the Modern Slavery Industry Impact Hub, in helping develop best practice approaches and case studies, assessment tools and training, and supported the industry leadership statement on human rights and modern slavery.

## The Groupe Speciale Mobile Association (GSMA)

The GSMA represents the interests of mobile operators worldwide, bringing together more than 750 operators and approximately 400 companies in the broader mobile ecosystem. As a global member-led organisation, Optus (through its parent Singtel's membership), has opportunities for collaboration on a range of topics, such as modern slavery and human rights, providing valuable insights and enabling members to work towards common goals.

**"Optus respects the human rights and freedoms of every individual and believes there is no place for modern slavery in our world. It is critical to collaborate as an industry to explore areas to collectively make a positive impact to reduce any risk of modern slavery in our supply chains."**







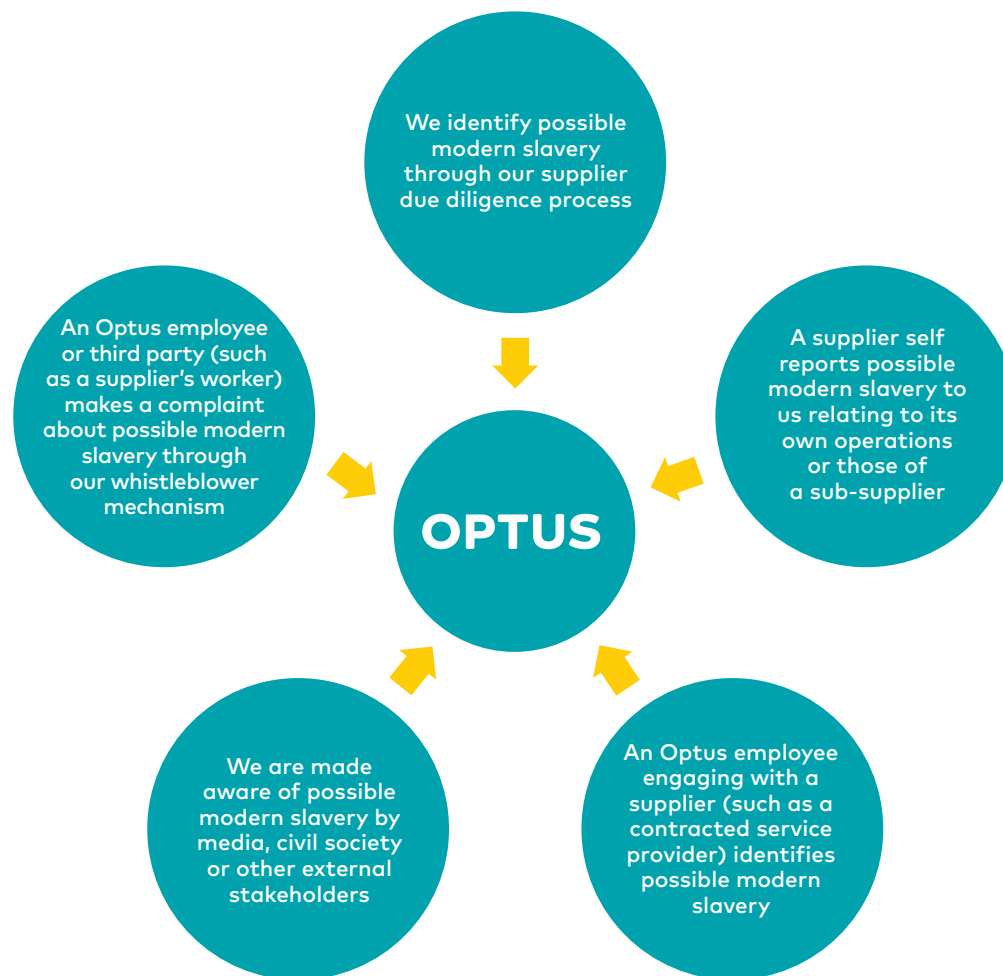
# Grievance mechanisms and remediation

We are committed to providing for, or cooperating in, remediation where we identify that we have caused or contributed to human rights harm, such as modern slavery. This commitment is set out publicly in our Optus Human Rights Statement.

As shown in the visual on the right, we recognise that we could become aware of a modern slavery incident or allegation relating to our operations or supply chain in a range of ways. During the reporting period, we did not identify any instances of modern slavery. However, as outlined below, we did take steps to respond to a complaint relating to contracted workers.

During the reporting period, we also developed an internal Modern Slavery Incident Response Plan (Response Plan). The Response Plan provides a framework to help guide our response to any future modern slavery incident or allegation. The case study below explains how we developed the Response Plan and summarises key content.

We understand that whistleblower hotlines and other processes to support the identification and remediation of modern slavery incidents can only be effective if they are trusted and accessible. During the reporting period, we continued to promote the Optus Whistleblower Hotline through relevant materials.





# Optus whistleblower **hotline**



Singtel Group Whistleblower Policy applies to the management of whistleblower complaints at Optus



Singtel Group Whistleblower Policy provides all whistleblowers with protection from detrimental conduct, such as reprisals and retaliation



Optus Whistleblower Hotline (Hotline) enables reporting of any unethical and inappropriate conduct or concerns, such as fraudulent, corrupt or illegal activity, including any potential complaints related to modern slavery



Hotline is an independent service operated by an external service provider



Hotline is accessible to Optus employees, Partners and their employees, contractors and authorised representatives of suppliers and suppliers' workers



During FY22, no specific allegations of modern slavery were received through the Hotline



# Case study

## Developing a Modern Slavery Incident Response Plan

We developed our Response Plan through a collaborative process led by Optus Sustainability with support from an external specialist business and human rights advisory firm. Key Optus functions including People and Culture, Internal Audit, Legal, Procurement, Retail, Risk, and Service participated in the development of the Response Plan, including through an interactive workshop to test the proposed plan.

The Response Plan sets out in detail the process we would follow to respond to a modern slavery incident or allegation. We recognise that responding to modern slavery incidents or allegations is highly context specific and the Response Plan provides us with a practical, principles-based framework that we can apply to different contexts, such as modern slavery incidents that occur in Australia or overseas.

The Response Plan includes a series of practical steps to assist us to review, respond to, and where appropriate, remediate or cooperate in remediating a modern slavery incident or allegation. These steps include practical guidance about key actions we might choose to take, including advice on investigative approaches and developing remediation plans.

Importantly, the Response Plan also sets out 10 key principles to guide our response to any modern slavery incident or allegation. These principles include:

- Prioritising the wellbeing of potential victims;
- Focusing on the risk of harm to people (in particular any potential victims) in addition to risk to the business when developing our response; and
- Ensuring the safety of our own people at all times.





# Assessing our effectiveness

We understand that maintaining a strong response to modern slavery requires a continuous improvement approach. Measuring the effectiveness of our actions to assess and address modern slavery risks is a key part of the continuous improvement cycle and helps us to identify opportunities to refine and improve our response.

We consider that an effective business response to modern slavery involves multiple elements. These elements include: a meaningful understanding of potential or actual modern slavery risks across the business' operations and supply chains; the capacity to address these risks through practical actions, such as meaningful supplier engagement and collaboration with stakeholders; and the development of processes to remediate or cooperate in the remediation of any modern slavery-related harm the business identifies it has caused or contributed to.

We currently assess the effectiveness of our response against a range of quantitative and qualitative criteria, as set out to the right:

Effectiveness criteria	How this criterion helps us understand effectiveness
<ul style="list-style-type: none"> <li>The successful implementation of action items under our Modern Slavery Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>Tracking our progress in this area helps us identify areas of our response that are progressing well and areas where further work may be required</li> </ul>
<ul style="list-style-type: none"> <li>The number of staff who have completed our modern slavery e-learning module and feedback from staff who have completed other training sessions, including the e-learning</li> </ul>	<ul style="list-style-type: none"> <li>Tracking the number of staff who complete training and any feedback assists us to understand levels of modern slavery awareness across our business and where there are opportunities to further tailor training to address key knowledge gaps</li> </ul>
<ul style="list-style-type: none"> <li>Completion rates for our supplier questionnaires and any supplier feedback about the questionnaire process</li> </ul>	<ul style="list-style-type: none"> <li>Tracking the implementation of our supplier questionnaires and any supplier feedback supports us to understand whether the questionnaires are fit for purpose and identify opportunities to further refine the process</li> </ul>
<ul style="list-style-type: none"> <li>The number of modern slavery-related complaints reported to our Whistleblower Hotline (or other channels) and whether any cases were substantiated</li> </ul>	<ul style="list-style-type: none"> <li>Tracking the number of modern slavery related complaints received and whether any cases were substantiated helps us to assess whether our grievance mechanisms are able to identify and respond to modern slavery incidents or allegations and whether we are able to meaningfully investigate and address any complaints</li> </ul>
<ul style="list-style-type: none"> <li>Any feedback from our suppliers, staff, business partners or other stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>External feedback helps us to understand different perspectives on our modern slavery response and identify opportunities for continuous improvement</li> </ul>
<ul style="list-style-type: none"> <li>Information about good practice provided through collaborative forums such as the UN GCNA Modern Slavery Community of Practice and the Telco Together Foundation that can be used to benchmark our own processes</li> </ul>	<ul style="list-style-type: none"> <li>Participation in collaborative forums helps us to understand how our response compares to key peers across the telecommunications sector and more broadly</li> </ul>

We track our performance against these criteria through both internal and external mechanisms. Internally, we leverage the expertise in our Modern Slavery Working Group to monitor and seek internal feedback on the impact of our actions. Externally, we welcome feedback from our suppliers, staff, business partners, expert advisors and other stakeholders. We also draw on collaborative forums such as the UN GCNA Modern Slavery Community of Practice and the Telco Together Foundation to consider good practice and identify areas where we can improve our response.

We acknowledge that measuring the effectiveness of our actions is complex and we will continue to look for opportunities to expand and strengthen our approach to measuring effectiveness, including considering any relevant findings from the Australian Government's 2022 review of the MSA.





# Future plans

Optus recognises that our approach to modern slavery risk management is an ongoing process and one which will continue to be enhanced in the coming years. Our Modern Slavery Action Plan guides our continuous improvement approach and sets out key priorities over the next three years.

## In the year ahead, our priorities include:

- Updating our existing modern slavery e-learning module.
- Reviewing our modern slavery contract clauses.
- Undertaking modern slavery deep dives with selected suppliers.
- Finalising results from our ethiXbase questionnaires, including to identify key trends and opportunities for further action.
- Exploring opportunities to work with our suppliers to strengthen their capacity to manage modern slavery risks, including by taking into account key findings from our ethiXbase questionnaires.
- Continuing to support collaboration within the telecommunications sector and across sectors, including through ongoing participation in forums such as the UN GCNA, Telco Together Foundation and GSMA.
- Engaging with the Australian Government's review of the MSA through collaborative forums, such as the UN GCNA.



# Consultation

## Consultation to develop Optus' Modern Slavery Statement

This Statement was prepared in consultation with each reporting entity covered by the Statement (see Appendix Two). Reporting entities covered by this Statement all share the same company secretary,<sup>8</sup> who was consulted in developing the Statement, including reviewing a draft version of the Statement.<sup>9</sup> Additional consultation was also undertaken with Optus Cyber Security (OCS), in recognition of the differences in activities undertaken by OCS compared with the Optus group.

Consultation was also undertaken with owned and controlled entities through engagement at company secretary level.

The overall development of the Statement was led by the Working Group, which includes representatives from key functions across the Optus group, including Sustainability, Legal, Procurement, Risk, Enterprise and Business, Internal Audit, People and Culture, Retail and Service. The Working Group members contributed to and reviewed drafts of the Statement and discussed key issues at regular Working Group meetings.

## Consultation on Optus' modern slavery response

In addition to consultation to prepare the Statement, Optus continued to consult internally on the implementation of our broader modern slavery risk management processes throughout the reporting period. Our Working Group provides the primary mechanism for cross-functional consultation, but we also engage with other business units as required. For example, we consulted with a range of Optus business units to inform the development of our salient human rights assessment.

<sup>8</sup>. However, in the case of Optus Cyber Security Pty Limited, the company secretary during the reporting period for this Statement resigned effective 4 April 2022, at which time a new company secretary was appointed.

<sup>9</sup>. The company secretary also served as the company secretary for Optus Insurance Services Pty Ltd during the reporting period.





# Appendix one:

## How our Statement addresses the mandatory reporting criteria

This Statement has been prepared to meet the mandatory reporting criteria set out under the MSA. The table below identifies where information relating to each mandatory reporting criterion can be found in this Statement.

<b>Modern Slavery Act requirement</b>	<b>Reference in this Statement</b>
Identify the reporting entity	<ul style="list-style-type: none"><li>• About this Statement (page 3)</li><li>• Appendix Two (page 30)</li></ul>
Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"><li>• Our structure, operations &amp; supply chains (page 7)</li></ul>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	<ul style="list-style-type: none"><li>• Identifying our modern slavery risks (page 10)</li></ul>
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	<ul style="list-style-type: none"><li>• Identifying our modern slavery risks (page 10)</li><li>• Policies and governance (page 12)</li><li>• Due diligence (page 15)</li><li>• Training (page 21)</li><li>• Collaboration (page 22)</li><li>• Grievance mechanisms and remediation (page 23)</li></ul>
Describe how the reporting entity assesses the effectiveness of such actions	<ul style="list-style-type: none"><li>• Assessing our effectiveness (page 26)</li></ul>
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	<ul style="list-style-type: none"><li>• Consultation (page 28)</li></ul>
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"><li>• CEO Message (page 5)</li><li>• Future plans (page 27)</li></ul>



# Appendix two:

## Reporting entities

The reporting entities covered by this joint Statement are:

- Singtel Optus Pty Limited: Provision of telecommunications services
- Optus Networks Pty Limited: Provision of telecommunications services
- Optus Mobile Pty Limited: Provision of mobile phone services
- Optus Internet Pty Limited: Provision of services over Hybrid Fibre Co-Axial Network and National Broadband Network
- Optus Satellite Pty Limited: Provision of satellite services
- Alphawest Pty Limited: Provision of information technology services
- Ensyst Pty Limited: Provision of cloud services
- Alphawest Services Limited: Provision of information technology services
- Optus Insurance Services Pty Limited: Provision of handset insurance and related services (this entity was sold after the end of the reporting period)
- Optus Wholesale Pty Limited: Provision of services to wholesale customers
- Optus Satellite Network Pty Limited: Provision of satellite services
- Optus C1 Satellite Pty Limited: Provision of satellite services
- Optus ADSL Pty Limited: Provision of carriage services
- Optus Vision Pty Limited: Provision of telecommunications services
- amaysim (Amaysim Mobile Pty Limited): Provision of mobile phone services
- Optus Cyber Security Pty Limited: A Singtel Group entity that supplies cyber security hardware and software services, professional consulting and managed security services

## Additional information about Optus Cyber Security Pty Limited

This additional information about Optus Cyber Security Pty Ltd (OCS) is provided to support its reporting obligations under the MSA. OCS is a wholly owned subsidiary of Singtel and part of the Trustwave group of companies (Trustwave Group).

OCS employs approximately 200 employees in Australia and is headquartered in Sydney. Due to the professional services based nature of the roles and the location of employees in Australia, OCS considers that risks of modern slavery in its direct operations are likely to be low.

During the reporting period, OCS procurement spend was approximately \$60 million. The majority of OCS' procurement is undertaken through shared services with Optus and so is governed by Optus' procurement policies and processes, including in relation to modern slavery. Given OCS' reliance on shared services provided by Optus, the information about Optus' modern slavery risks and its actions to assess and address these risks set out in this Statement are also relevant to OCS. In addition, Trustwave (including OCS) also follows key Singtel Group policies and processes relating to the management of modern slavery risks, including the Singtel Supplier Code of Conduct. Trustwave also has its own whistleblower service which is available to OCS employees and contractors. No modern slavery related complaints were received through this mechanism during the reporting period, but OCS recognises this does not necessarily mean no risks are present.

Given its comparatively low modern slavery risk profile, reliance on Optus' shared services and implementation of Singtel Group policies, OCS does not separately assess the effectiveness of its actions to manage modern slavery risks at this time.





Yes OPTUS