

# Optus Modern Slavery Statement 2025



yes OPTUS

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# Overview



# About this statement

**This Modern Slavery Statement (Statement) is made by Singtel Optus Pty Limited and covers the Optus group of companies for the 2025 financial year reporting period (1 April 2024 – 31 March 2025). Data in this statement is correct as of 31 March 2025 (the end of the reporting period covered by this statement) unless indicated otherwise. The reporting entities covered by this Statement are listed in Appendix 2.**

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 Board of Directors of Singtel Optus Pty Limited and its committees. 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 and Responsible Procurement teams in consultation with our Modern Slavery Working Group, which includes additional stakeholders from relevant departments across Optus, such as Risk, Legal, Internal Audit, Global Contact Centres, Process and Operational Excellence, and People and Culture<sup>2</sup>. Further information about consultation across the Optus group of companies is set out on page 43.

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>3</sup>.

We welcome feedback on this 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> Department titles are correct as of the time of publication.

<sup>3</sup> 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.



## CEO statement



**Stephen Rue**  
Chief Executive Officer

I am pleased to present Optus' sixth modern slavery statement and my first as CEO. At Optus, we have long believed in taking meaningful action to shape a better tomorrow. We take a zero tolerance approach when it comes to modern slavery in all its forms. This includes working with our suppliers and other stakeholders to raise awareness and address modern slavery risks in the telecommunications sector.

Over the past year, we took important steps to strengthen our modern slavery risk management approach. We rolled out a new social audit program for selected suppliers and commenced activity towards gaining entry into a global alliance of telecommunications companies to strengthen supplier audit collaboration. We also maintained our focus on training for our people and collaboration with our industry peers, including supporting the development of a publication on human rights due diligence in Australia and a modern slavery best practice handbook for suppliers.

We will maintain this focus on continuous improvement over the next reporting period. Key priorities for us over FY26 include expanding our social audit program and providing additional guidance to suppliers. We will also explore opportunities to support and continue to engage with the work of the new Federal Anti-Slavery Commissioner, as well as wider government consultations about potential amendments to the MSA.

Our work to address modern slavery also supports our broader commitment to respect human rights, including those of our customers. In this context, we have sincerely apologised to all customers affected by Optus' sales misconduct practices highlighted by the Australian Competition and Consumer Commission (ACCC) in October 2024, and for the distress caused. We are remediating affected customers; implementing extra training for our people; transitioning a number of licensee stores to Optus; and we are implementing extensive changes across our business and associated practices to prevent this type of misconduct from happening again. We are committed to continuous improvement and ensuring that we do better for all customers in the future.

We are pleased to be sharing this Statement with you and invite your feedback.

A handwritten signature in blue ink that reads "Stephen Rue".

**Stephen Rue**  
Chief Executive Officer



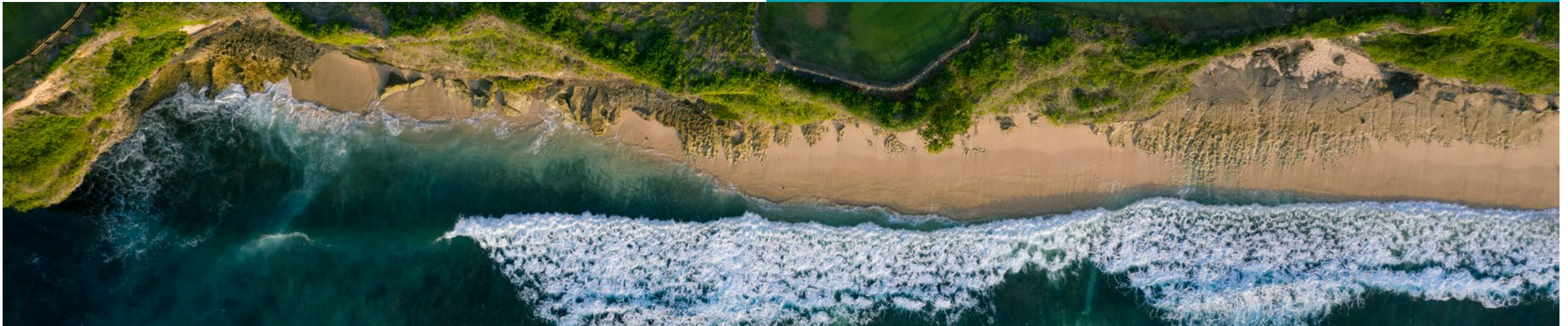
# Introduction

All businesses have an important role to play in combating modern slavery in global supply chains, including in the telecommunications sector. Our work to assess and address modern slavery risks in our operations and supply chain is a key element of our commitment to respect all internationally recognised human rights in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

As a leading Australian telecommunications provider, we are committed to ensuring there is no place for modern slavery in our operations or supply chain. 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 action to help end modern slavery.

## What is Modern Slavery?

Modern slavery occurs when 'coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom'<sup>4</sup>. Modern slavery involves serious human rights abuses and can happen here in Australia, as well as overseas. The International Labour Organization (ILO) and Walk Free Foundation estimate that over 50 million people around the world are victims of modern slavery. According to 2024 ILO estimates, the illegal profits from this exploitation amount to US\$236 billion. The Walk Free Foundation also estimates there may be up to 41,000 modern slavery victims in Australia and that electronics are one of Australia's 'top five imported products at risk of modern slavery'.



<sup>4</sup> This definition of modern slavery is taken from the Australian Government's official guidance material about the MSA.

# Our progress to date

Continuous improvement is core to our modern slavery response and we aim to be transparent about our goals and progress.

We are working to further refine our modern slavery risk management across a range of areas.



**In our last statement, we committed to:**

Considering scope to implement social audits for selected suppliers.

Engaging with selected higher risk suppliers, including relevant Own Brand suppliers, through detailed reviews to assess their modern slavery risk management.

Implementing enhanced modern slavery contract clauses with selected suppliers.

Delivering tailored training to relevant vendor and category managers to support them to better manage modern slavery risks through their engagement with suppliers.

Supporting the development of the Singtel Group Responsible Procurement Policy and strengthening our suppliers' understanding of our human rights and modern slavery requirements.

Implementing modern slavery tender questions for higher risk suppliers and using the results to inform our understanding of risk areas and approach to risk management.

**We took the following actions to progress these commitments:**

Rolled out a new social audit program, targeting five key suppliers to assess compliance with ethical sourcing and labour standards, including as set out in our Supplier Code of Conduct. With our parent company (Singtel) we also commenced activity towards gaining our entry into a global alliance of telecommunications companies to strengthen supplier audit collaboration, with formal membership secured shortly after the reporting period.

As part of broader due diligence related engagement with suppliers, we continued to meet and engage with suppliers around modern slavery and other sustainability topics and issues.

Finalised enhanced modern slavery clauses during the reporting period. We are rolling these out to our higher-risk suppliers where they can have the greatest impact.

Delivered targeted training to vendor and category managers, equipping them to address modern slavery risks and apply the new contract clauses in supplier engagements. This specialised training is provided in addition to the modern slavery e-learning module.

Contributed to the successful launch and implementation of the Responsible Procurement Policy. The new policy outlines modern slavery and broader human rights expectations of our suppliers and the materials in the products we procure.

Continued integration of sustainability questionnaires into key sourcing activities across relevant goods and services categories. We also embedded questionnaire options relating to modern slavery risks into the Optus tender pack to enhance supplier engagement and drive consistent sustainability practices, including to support identification and engagement with higher risk suppliers.



# Our future plans

**Over the next reporting period, we aim to prioritise:**

**Expanding our social audit program**

to the Joint Alliance for Corporate Social Responsibility (JAC) audit standard, to assess shared suppliers.

**Engaging with global peers**

through JAC to share audit results for common suppliers.

**Exploring opportunities**

to include modern slavery considerations in other supplier checks and engagement points, such as for workplace health and safety.

**Developing guidance**

for our suppliers to support them to develop and maintain effective grievance mechanisms



# 1.

## Our structure, operations and supply chain





**We are Australia's second largest telecommunications provider. We provide customers with over 12 million services across Australia each day, and understand the important role we play in tackling modern slavery.**

## Our structure

Optus is part of the Singtel Group, Asia's leading communications technology company that, through its associates, has a combined 780 million mobile customers across 20 countries. Optus operates as a corporate group comprised of over 30 entities. In addition to the customer-facing entities listed in Appendix 1 that provide telecommunications, content and other services, Optus also operates subsidiaries that provide support services for our operations, including engaging Optus staff and performing management and billing services.

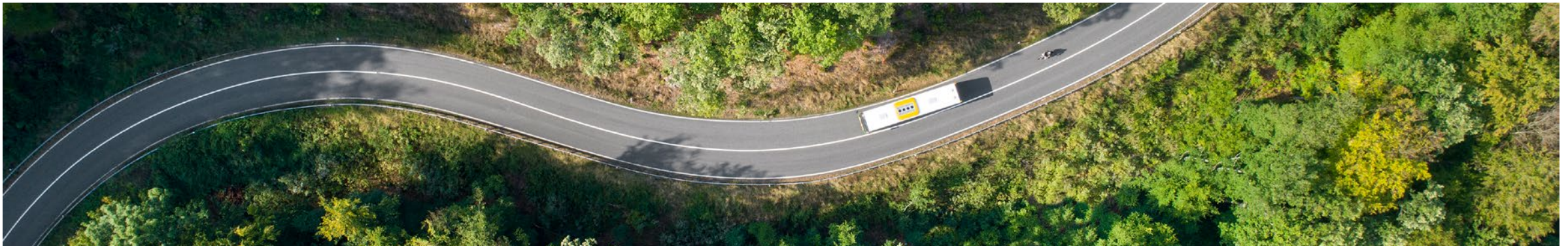
Optus is headquartered in Macquarie Park, New South Wales, and we have offices and retail outlets across all states and territories of Australia, employing more than 6,700 people<sup>5</sup>. Key departments across our business relevant to our modern slavery response include Sustainability, Responsible Procurement, Risk, Legal, Internal Audit, Global Contact Centres, Process and Operational Excellence, and People and Culture.

## Our operations

We deliver a comprehensive range of telecommunications products and services, including mobile and fixed line telephone, 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.

Our nationwide retail network operating under the Optus brand includes proprietary, franchisee, and licensee stores. Optus stores are in 261 locations to provide Australians with easy access to high quality telecommunications services and solutions.

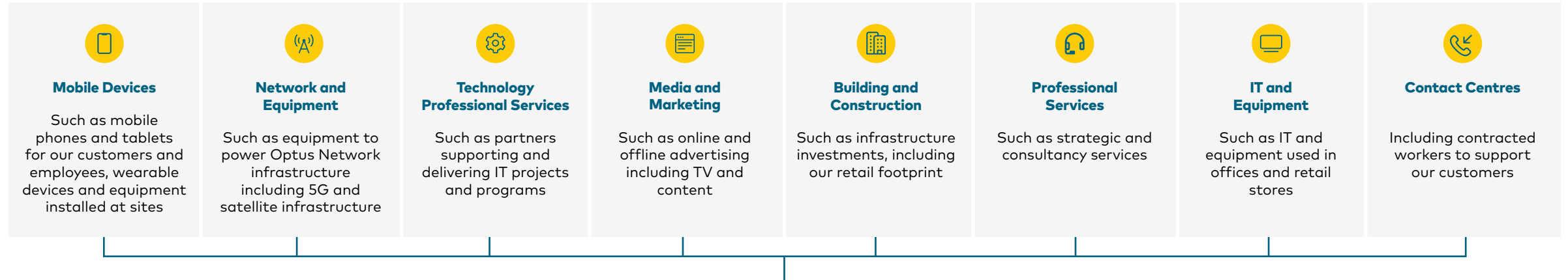
We also service the telecommunications market through our wholesale business, which sells access to our communications network to other telecommunications service providers. In addition, we have agreements with business partners overseas who provide roaming services to our customers travelling outside Australia. In some cases, these roaming services are provided by other entities in the Singtel Group.



<sup>5</sup> These numbers include casual, regular and fixed term employees including those with <1 year.

## Our supply chain

We have a large and diverse global supplier base with over **1,100 direct suppliers**. Approximately **95% of our procurement spend** in the reporting period was in the following categories:



## Our operations:

We are a fully integrated telecommunications provider. We have **261 Optus stores** (approximately two-thirds managed by partner groups)

### Our people:



**6,700+**  
team members



**300+** contingent\* workers  
within our Australian operations



Various types of external services workers,  
such as 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. **98.5% of the Australian population** is covered by our 4G and 5G networks.

**Note:** \*Contingent Workers are not employees of Optus. They are individuals engaged or sourced through a recruitment service or payroll service provider, who are part of an approved supplier panel. They perform work at Optus on a temporary or interim basis.



# Our supply chain

## We draw on our global supply chain to support our operations.

The majority of supplier identification, evaluation and engagement is facilitated by Optus Procurement. Responsible Procurement is an important priority across the Singtel Group (including Optus), and during the reporting period we established an Optus Responsible Procurement team. This team supports our supplier engagement work on modern slavery and other key environmental, social and governance (ESG) priorities. The team works closely with the broader procurement team and wider business to align commercial and business goals with the Optus Sustainability strategy and various ESG related commitments.

### Where are our suppliers located?

While approximately 95% of our 1,100+ suppliers are located in Australia, many of these may operate in or source from diverse countries overseas. Levels of modern slavery risk across these countries may vary, including due to factors such as conflict and displacement and the effectiveness of local legal frameworks.



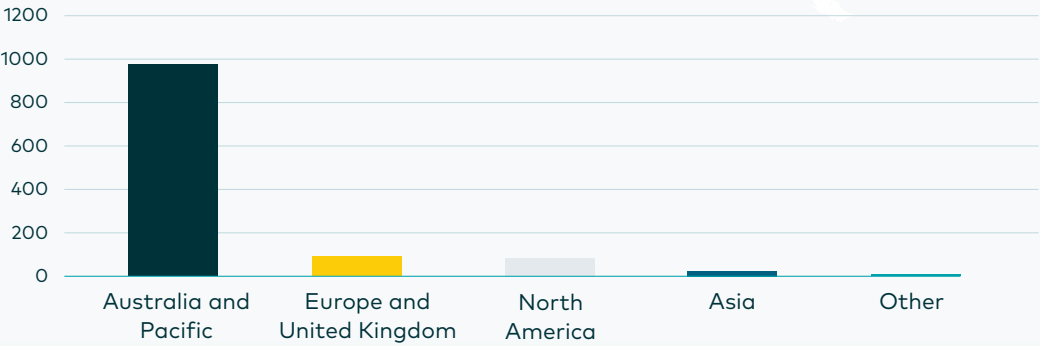


# Our geographic sourcing footprint

The supplier data used in this visual and the graph below is based on the country where the supplier entity engaged by Optus has been established. This may be different to the location of the global parent company for the supplier and is also not necessarily the country where the product or service is manufactured or sourced from.



Approximate number of Optus tier one suppliers by region



External service workers

% of Optus Goods Received Notices (GRN) amount by country

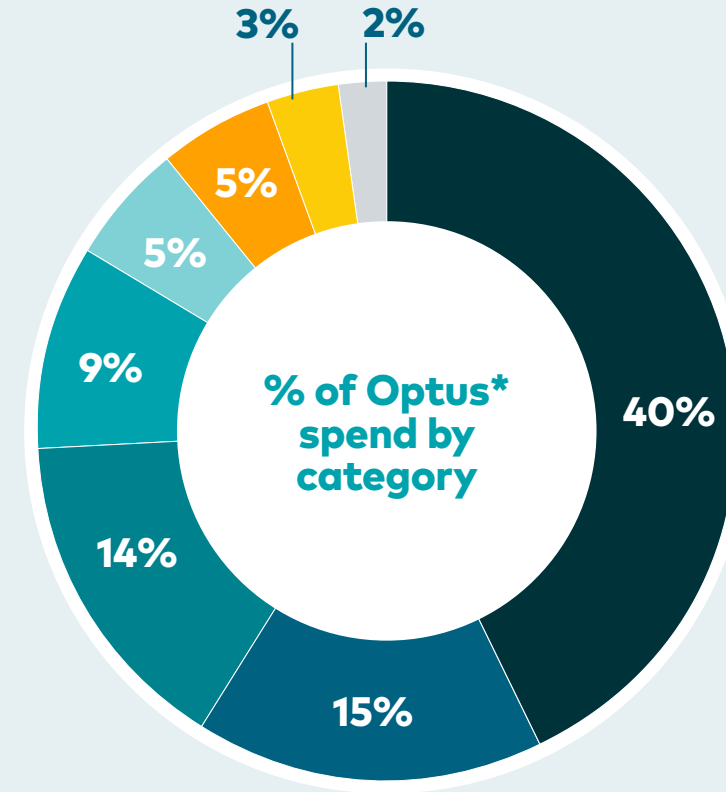


## What do we procure from our suppliers?

**The different categories we source goods and services from may also involve different levels of modern slavery risk.**

As shown in the visual to the right, a significant proportion of our supplier spend is for mobile devices as well as network and equipment. However, while our spend in some categories such as devices is concentrated across a small number of suppliers, our spend in other categories like professional services can involve a higher number of suppliers. The size of our suppliers can also vary significantly within and across categories.

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, although we have significant spend with our electronic devices suppliers, the size of these businesses means we may have limited leverage to influence how they manage their modern slavery risks. The visual to the right shows information about our supplier spend across key categories based on annual goods receipts by category.



**Note:** \*% of GRN by category is based on dollar (\$) value of GRNs. Values are indicative and provided for illustrative purposes and do not add to 100%.

# 2.

## 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 chain.





# How telecommunications companies could be involved in modern slavery risks

In line with the 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. The table below summarises how this ‘cause, contribute, directly linked’ continuum of involvement is relevant to the telecommunications sector.

This continuum of involvement is important as it helps identify the different ways that telecommunications companies could be involved in modern slavery. We have also drawn on the continuum of involvement to inform our Modern Slavery Incident Response Plan, which provides guidance on how we would seek to remediate modern slavery harm in line with the UNGPs expectations.

Cause	Contribute	Directly linked
<p><b>A business may cause modern slavery if its actions directly result in modern slavery practices occurring.</b></p> <p>Telecommunications companies could potentially cause modern slavery by, for example, employing young workers who are potentially subjected to hazardous work or otherwise exploited. Optus employs a limited number of young workers under the age of 18. Where employed, these young people perform work in our retail stores. Optus has a practice of ensuring that all employees are at least 16 years of age to ensure that Optus complies with child employment laws. In addition, where young workers are engaged, they are paid at the adult rate of pay under the Optus Retail Agreement 2023 and their conditions of work are defined by this enterprise agreement which also limits the number of hours of work and prescribes breaks between shifts and overtime.</p>	<p><b>A business may contribute to modern slavery if its actions or omissions facilitate, enable or incentivise modern slavery practices to occur.</b></p> <p>Telecommunications companies could potentially contribute to modern slavery in a number of ways. For example, this could include where the company disregards credible evidence that a supplier is engaged in modern slavery (for example in an audit report) and does not take any steps to address the exploitation. As outlined in this statement, we work to manage modern slavery risks in our supply chain including through supplier screening and our social audit program. More information on these steps can be found on page 30.</p>	<p><b>A business may be directly linked to modern slavery where it is connected to modern slavery through its products, services or operations (including where there is no direct contractual relationship).</b></p> <p>Telecommunications companies could potentially be directly linked to modern slavery if exploitation occurs in their supply chains. For example, goods such as mobile devices could be procured from a supplier which produces the devices at third party factories, which use raw materials that are produced through forced labour. We take a number of steps to manage these risks, including working to enhance our engagement with suppliers to understand their extended supply chains and risk management approaches. More information about our work with suppliers, including to build their capability to manage modern slavery risks can be found on page 34.</p>

## Our salient human rights issues

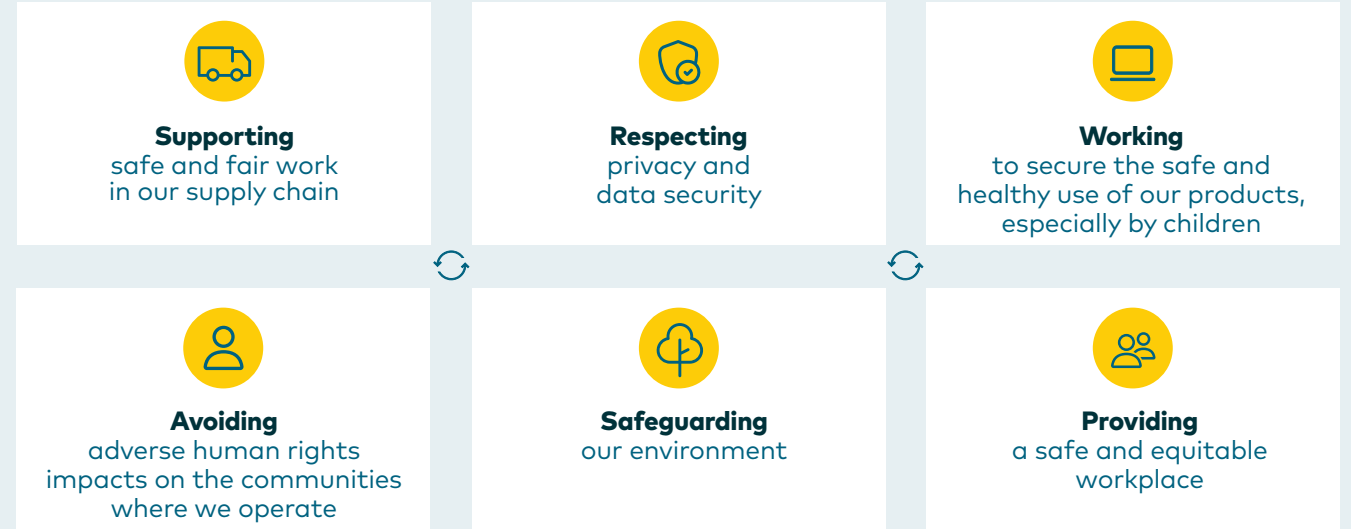
**Our commitment to respect human rights applies not only to modern slavery, but to all internationally recognised human rights. In particular, for our sector, relevant human rights that we may impact include the human rights to privacy; to a clean, healthy and sustainable environment; and children's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

We have identified our six salient human rights issues, which are the 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.

One of our salient issues outlined above is avoiding adverse human rights impacts in communities where we operate. In this context we have sincerely apologised to all customers affected by Optus' sales misconduct practices, highlighted by the Australian Competition and Consumer Commission (ACCC) in October 2024, for the distress caused. The misconduct involving customers, many of whom were vulnerable, is unacceptable and totally out of step with the purpose and values of Optus as a company.

In keeping with our objective to avoid adverse human rights impacts in communities where we operate, Optus is prioritising remedial action to address unconscionable conduct and inappropriate sales practices which occurred between August 2019 and July 2023. Optus has sincerely apologised to all customers affected by Optus sales misconduct, and impacted customers are receiving financial remedies as part of a remediation approach which is informed by financial counsellors and industry partners to make sure it is fair and reasonable.

Optus is making significant changes to improve sales practices and better support customers - especially those who are vulnerable. This includes new training and enablement for our customer facing teams, uplift of our systems and process controls to support responsible selling and an improved customer experience; and strengthening our governance and compliance to prevent inappropriate selling in future. We are committed to making the changes that are needed to ensure that we do better for all customers in the future.



**Modern slavery is often closely connected to other human rights impacts. For example, a factory that exploits its workers may also have poor environmental practices. 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. While the six salient human rights issues above are all of equal importance to Optus, our work to manage modern slavery risks are particularly relevant to the following areas:**

1. Supporting safe and fair work in our supply chain
2. Avoiding adverse human rights impacts on the communities where we operate
3. Providing a safe and equitable workplace
4. Working to secure the safe and healthy use of our products, especially by children (recognising that children can be especially vulnerable to exploitation online)



# Understanding our modern slavery risk profile



The table below highlights six areas of our operations and supply chain where we consider there may be potential for modern slavery to occur if our controls were not effective. It also identifies risk factors that may contribute to the vulnerability of workers to exploitation. The key controls we use to manage modern slavery risks are set out in the following section.

During the previous reporting period, we re-validated our understanding of our modern slavery risks by undertaking a desktop review of key factors (including sector, product and geographic risk factors) and the evidence base for modern slavery across relevant risk areas. This process drew on expertise from an expert business and human rights advisory firm, as well as information from credible third-party reports and tools from the Australian and United States' Governments, expert civil society groups, and other stakeholders. We consider there have not been any material changes to our modern slavery risk profile since this re-validation. We will continue to monitor our modern slavery risk profile, including additional guidance and assessments from the Australian Government and independent office holders such as the New South Wales (NSW) Anti-Slavery Commissioner.

## Our operations

Overall, we assess that our operations involve a comparatively low level of modern slavery risk. This reflects factors such as the concentration of our direct workforce in Australia and the nature of the work typically undertaken by our people. However, as outlined below, we recognise that there are areas of our broader operations where modern slavery risks could occur if our controls and risk management were not effective.

In line with the UNGPs, we assess that we could be directly linked to any potential modern slavery that might occur in the areas identified below.



Potential risk area where modern slavery could occur		Potential modern slavery risk factors that may contribute to the vulnerability of workers	How this risk area is relevant to Optus
	Partner groups operating branded retail stores	<ul style="list-style-type: none"><li>Use of franchisee and licensee arrangements may affect visibility of working conditions in partner-operated stores.</li></ul>	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 to address potential risks is set out on page 32.
	Services provided by workers in offshore contact centres	<ul style="list-style-type: none"><li>Use of lower skilled labour, which may include migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance.</li><li>Workers may be located in countries with differing levels of modern slavery risks and legislative and other protections.</li></ul>	Our operations are supported by employees of our suppliers based outside of Australia. For example, approximately 5,000 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 to address potential risks is set out on page 32.

# Understanding our modern slavery risk profile (continued)

## Our supply chain

Overall, we assess that our greatest exposure to modern slavery risks is through our supply chain. The level of modern slavery risk in our supply chain varies by category and may be shaped by factors such as the locations where suppliers and their sub-suppliers operate, the types of workers involved in the supply chain (e.g. whether workers are part of more vulnerable groups such as migrant workers), and the nature of the materials used in the production of products for Optus. While the categories below may involve higher modern slavery risks, we consider that other areas of our supply chain are likely to be lower risk, such as our engagement of professional services providers.



In line with the UNGPs, we assess that we could be directly linked to any potential modern slavery that might occur in the areas identified below.

Potential risk area where modern slavery could occur		Potential modern slavery risk factors that may contribute to the vulnerability of workers	How this risk area is relevant to Optus
	Contractors building and maintaining telecommunications infrastructure	<ul style="list-style-type: none"><li>• Use of lower skilled contracted labour who may have limited understanding of workplace rights and face other barriers in seeking assistance.</li><li>• Use of raw materials which may involve higher modern slavery risks, including where these materials are sourced from countries with a high prevalence of modern slavery.</li><li>• Potential provision of services outside core business hours (such as at nighttime), which may increase the difficulty of identifying exploitive practices by limiting visibility of working conditions.</li></ul>	We engage a range of contractors in Australia to build and maintain infrastructure. The Office of the NSW Anti-Slavery Commissioner has identified construction services and materials as involving high modern slavery risks in its inherent risk identification tool. Further information about our supplier risk management approach is set out on page 30.
	Contractors providing cleaning, security, waste removal and other property management services	<ul style="list-style-type: none"><li>• Use of lower skilled contracted labour, potentially including migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance.</li><li>• Potential provision of services outside core business hours (such as at nighttime), which may increase the difficulty of identifying exploitive practices by limiting visibility of working conditions.</li><li>• Sourcing from sectors that can involve strong pricing competition and where labour costs comprise a significant portion of suppliers' expenses, which may incentivise suppliers to reduce costs by engaging in exploitive practices.</li></ul>	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. The Office of the NSW Anti-Slavery Commissioner has identified facilities management services as involving high modern slavery risks in its inherent risk identification tool. Further information about our supplier risk management approach is set out on page 30.



## Understanding our modern slavery risk profile (continued)

### Our supply chain (continued)

Potential risk area where modern slavery could occur		Potential modern slavery risk factors that may contribute to the vulnerability of workers	How this risk area is relevant to Optus
	Procurement of products for resale and not for resale (eg devices, tablets, accessories, IT and network technology equipment, solar panels, batteries and uniforms) from suppliers	<ul style="list-style-type: none"> <li>• Use of lower skilled or low wage contracted labour, potentially including migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance.</li> <li>• Use of transport and logistics services such as shipping and warehousing where workers may be vulnerable to exploitation, including where they work in isolated conditions (such as seafarers).</li> <li>• Use of raw materials which may involve higher modern slavery risks, including where these materials are sourced from countries with a high prevalence of modern slavery.</li> <li>• Manufacturing of items in high risk countries heightening modern slavery risks.</li> </ul>	We have previously identified construction and maintenance support equipment; electrical equipment, components and supplies; and electrical wire management devices and accessories as higher risk supplier categories. The Office of the NSW Anti-Slavery Commissioner has identified IT equipment and uniforms as involving high modern slavery risks in its inherent risk identification tool. Further information about how we manage modern slavery risks related to the procurement of products is set out on page 30.
	Workers providing storage and warehousing services	<ul style="list-style-type: none"> <li>• Use of lower skilled contracted labour, potentially including migrant workers who may be vulnerable to recruitment fees, have limited understanding of workplace rights, and face other barriers in seeking assistance.</li> <li>• Potential provision of services outside core business hours (such as at nighttime), which may increase the difficulty of identifying exploitive practices by limiting visibility of working conditions.</li> </ul>	We engage a small number of suppliers to provide storage and warehousing services. Further information about our supplier risk management approach is set out on page 30.

# 3.

## Our Actions to Manage our Modern Slavery Risks





**We work continuously to improve our activities to manage our modern slavery risks in seven key areas:**



**Our governance  
structure**



**The role of  
our teams**



**Our policies**



**Our approach to  
due diligence**



**Our training  
(including capability  
building for suppliers)**



**Our collaboration  
and stakeholder  
engagement**

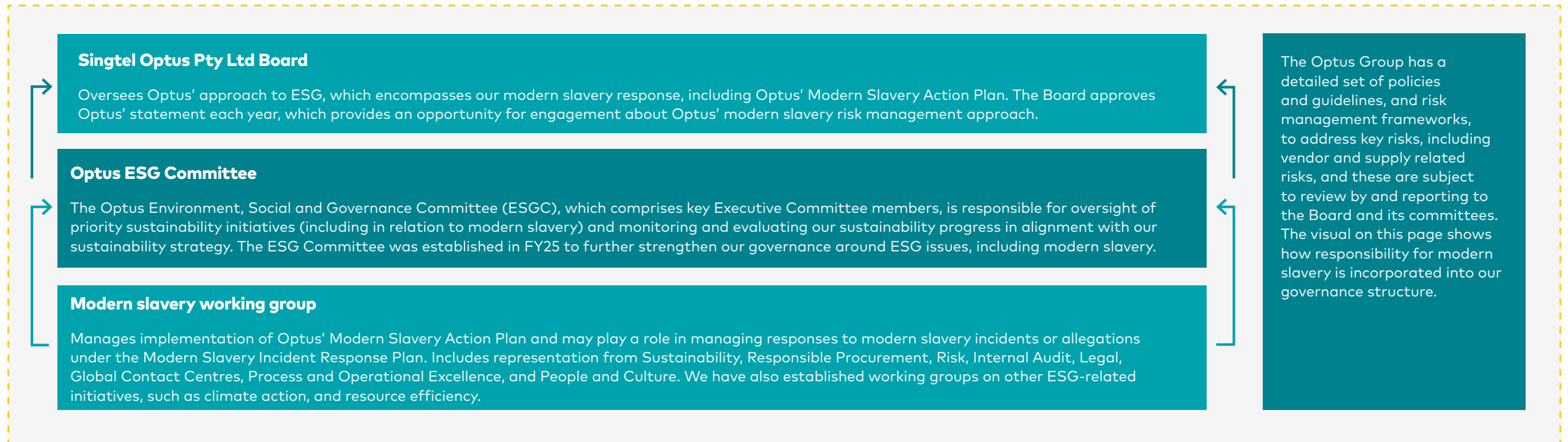


**Our grievance  
mechanisms and  
remediation**



## Our governance structure<sup>6</sup>

**Our response to modern slavery is led by our cross-functional Modern Slavery Working Group. The Sustainability and Responsible Procurement teams also collaborated directly throughout the year to progress work specific to their areas, including the implementation of our social audit program.**



<sup>6</sup> The section outlines the governance structure in place as of the end of the reporting period covered by this statement (31 March 2025).



# The role of our different teams

## Sustainability

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

## Procurement

Our dedicated Responsible Procurement team works closely with Sustainability to drive our modern slavery response, including supporting supply chain due diligence. We enable the business to embed modern slavery prevention and responsible sourcing into each stage of the procurement process.

## Legal

Our Legal team provides legal support for our response, including providing guidance on issues such as the development and use of modern slavery contract clauses in our agreements with suppliers.

## Internal Audit

Our Internal Audit team provides independent, objective assurance over the controls put in place to manage risks across Optus, including modern slavery. Internal Audit's investigation team may play a role in identifying and then investigating modern slavery related complaints received through our whistleblower mechanism or other reporting channels

## Risk

Our Risk team oversees the operationalisation of the risk management framework across Optus, which can include the management of risks relating to modern slavery.

## People and Culture

Our People and Culture Team is responsible for the development and implementation of our People and Culture policies, procedures and practices, and manages engagement of contingent workers under contracts put in place with oversight from the Procurement team.

## Global Contact Centres, and Process and Operational Excellence

Our core product and services teams play a role in managing potential modern slavery risks related to the products and services provided by Optus, including retail stores and franchises, our offshore contact centres, and provision of services to our enterprise customers.

# Our policies

During the reporting period we enhanced our policy framework through the launch of a new Singtel Group Responsible Procurement Policy and an uplifted Singtel Group Supplier Code of Conduct. Subject matter experts from Optus' Sustainability and Responsible Procurement teams contributed to the development of both documents, including from a modern slavery risk management perspective.

Policy	How does the policy support our modern slavery response?	How is the policy implemented?
Human Rights Statement	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.	Optus has increased awareness and access to its Human Rights Statement through our internal communications and promoted it through our modern slavery e-learning module available to all Optus people.
Procurement Policy	The Procurement Policy's objective is to facilitate all goods and services being acquired via standard process, mitigating risk. As part of this Procurement Policy, we require suppliers to agree and 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.
Responsible Procurement Policy	The Singtel Group <u>Responsible Procurement Policy</u> was launched in November 2024 and is governed by the overarching Procurement Policy. The Responsible Procurement Policy sets out how ESG considerations are integrated into procurement decision making. Among other requirements for suppliers, the Responsible Procurement Policy highlights the importance of implementing the UNGPs, including demonstrating due diligence to address modern slavery and other human rights risks.	<p>The Responsible Procurement Policy is available online. A supplier forum was held by Singtel for key group suppliers to launch the new policy and raise awareness around sustainability risks and challenges, including human rights.</p> <p>At the Optus level, we tailored the policy to address Australia's unique landscape, championing compliance with the Modern Slavery Act and advancing supplier diversity. At Optus, we have also created clear internal guidelines to help business units put these standards into action.</p>



# Our policies (continued)

Policy	How does the policy support our modern slavery response?	How is the policy implemented?
Supplier Code of Conduct	The Singtel Group Supplier Code of Conduct sets out the expectations of all suppliers with whom the Singtel Group (including Optus) does business. An updated Supplier Code was released in November 2024. The updated Supplier Code of Conduct continues to include a specific section on human rights, including modern slavery. This section sets out the Singtel Group's prohibition on the use of modern slavery in its operations and supply chain and expectations for suppliers. This includes a requirement for suppliers to have appropriate systems to demonstrate alignment with the UNGPs, ILO Conventions on labour standards, the Universal Declaration of Human Rights and the UN Convention on the Rights of the Child. Suppliers must also be able to demonstrate due diligence to manage modern slavery and broader human rights risks. The Supplier Code of Conduct also addresses wider issues that may be indicators of modern slavery, such as harassment and corruption.	<p>The Supplier Code of Conduct is published on the Singtel Group website, including the supplier portal. 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. This requirement is included in contractual agreements with suppliers.</p> <p>The Supplier Code is supported by a publicly available e-learning video on the Singtel website that includes segments on modern slavery, labour rights and child labour, and other issues.</p>
Contractual terms and conditions	We require our suppliers to take reasonable steps to identify and prevent the occurrence of modern slavery offences in their organisation and supply chain, 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. We also finalised additional contractual requirements for use with higher risk suppliers. Importantly, these updated clauses allow Optus to request suppliers implement certain modern slavery risk management actions where appropriate.	Where appropriate, we discuss these contract clauses with suppliers during contract negotiations. We may also ask our suppliers for access to reports, certifications, audit reports, information and documents, including the completion of a self-assessment questionnaire to assist us in monitoring ongoing compliance with these terms and conditions. We also delivered a specialised training session for Optus staff engaging with suppliers which included guidance about how to use the enhanced clauses (see page 33).
Employment policies and frameworks	Optus is a leading employer and developer of talent in the Australian market 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.

## Our Modern Slavery Action Plan

**Our internal Modern Slavery Action Plan identifies key steps we plan to implement to continue to refine our modern slavery response. 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 meetings. We periodically refresh and update our Modern Slavery Action Plan.**

### Our modern slavery due diligence approach

Our due diligence processes are central to our modern slavery response, helping us identify, prevent, and manage supply chain risks as part of our broader supplier risk management framework.

We assess suppliers from the outset to evaluate potential risk—during sourcing and onboarding—and where appropriate using ESG questionnaires and contract clauses to evaluate their practices. All suppliers must accept the Singtel Group Supplier Code of Conduct before onboarding or participating in sourcing events. Our risk management continues throughout the contract lifecycle, and may involve regular reviews, audits of selected suppliers, training for relevant staff in Optus supplier facing roles, and data collection, with collaboration across key business stakeholders.

We continually refine our approach based on lessons learned and our evolving risk profile. For example, previously, we engaged selected suppliers through targeted questionnaires, but faced challenges with supplier participation and information verification. We also explored scope to implement third-party risk management platforms.

In the latest reporting period, we strengthened our due diligence by trialling a new supplier screening tool, implementing a third-party audit program for high-risk suppliers, and commenced activity towards gaining our entry into the Joint Alliance for Corporate Social Responsibility (JAC)—a telecom industry association focused on sustainable supplier audits. We also integrated modern slavery checks into our risk assessment tool, enhanced contract clauses, and updated our tender packs with modern slavery questions.

These improvements are guided by our Supplier Engagement Roadmap, developed in FY24 with external experts. The Roadmap helps us prioritise supplier engagement, identify and re-validate risk areas, and recommends targeted actions to address modern slavery risks across our supply chain.





## Case Study:

# Uplifting our procurement risk assessment tool

As we continue to mature our modern slavery and wider responsible procurement approach, we are focusing on opportunities to further integrate modern slavery considerations into business as usual processes across the business.

During the reporting period, we uplifted our Optus risk assessment tool, which must be completed as part of all sourcing events. The tool aims to help ensure a range of risks that could arise in the procurement context are assessed and managed consistently, including modern slavery.

As part of the tool, users must indicate whether the proposed supplier engagement includes activities undertaken offshore. For example, this could include service providers operating offshore or manufacturing products overseas. Where offshore activities are involved, the user is required to contact the Responsible Procurement Team to consider whether further assessment of modern slavery risks is required.

This tool has supported us to manage potential risks associated with procurements across the business. For example, the risk assessment tool highlighted a networks equipment procurement which involved the assembly in Australia of parts sourced from offshore. As a result, we were able to undertake further engagement with the Optus business unit on modern slavery.



## How we use key due diligence tools

**We take a risk based approach to supplier due diligence in line with the UNGPs. As part of our approach, we draw on the tools below to manage modern slavery risks.**



### Supplier screening

As a baseline measure, we have trialled a new third party risk screening tool to assess relevant suppliers. This tool allows us to monitor suppliers for adverse media and events, including in relation to human rights issues such as modern slavery.

During the reporting period, we applied this tool to 32 suppliers by spend (these suppliers comprise 66% of our total spend). We have also assessed other high risk suppliers. For example, we assessed all devices suppliers engaged by Optus, recognising devices can be a higher risk category for modern slavery.

Over FY26, we will continue to further integrate these checks into our procurement processes, including scope to apply these checks systematically at tender stage.



### Shared audits

During the reporting period, we commenced activity towards gaining our entry into the JAC at the Singtel Group level and became a member in early FY26. As a JAC member, we will collaborate with other members by undertaking audits on shared suppliers and in turn, will be able to access and contribute audit results for common suppliers across the telecommunications sector.

Going forward, we will use our JAC membership to support us to assess suppliers in sectors we have identified as higher risk (such as devices and network technology), who typically service multiple telecommunications customers.



### Targeted supplier audits

In September 2024, we began the implementation of a new Social Audit Program. This program involves a third party undertaking targeted on-site audits of selected Optus suppliers. The selection of suppliers was based on multiple factors including the suppliers' potential level of modern slavery risk.

Audits assess suppliers against areas including labour and working conditions, wages and hours worked, health and safety and environmental practices. Typically, the audit process includes a document review, site tour, management and worker interviews and processes to close out identified non-conformances. While we recognise audit processes can involve limitations, they provide an important tool for us to help verify whether suppliers are operating in line with the expectations set by the audit framework which aligns closely with our Singtel Group Supplier Code of Conduct.

During the reporting period, we successfully commenced five supplier audits across 10 sites and will continue to build out the audit program over FY26.



### Direct engagement with suppliers

Where appropriate, we also engage directly with suppliers to help us understand how they manage modern slavery and other broader sustainability risks. This enables us to complement our screening and audit processes through more informal engagement, while building our relationships with key supplier representatives. We continued to meet and engage with suppliers around modern slavery and other sustainability issues during the reporting period.



## Case Study:

# Reflections on supplier audits

Our supplier audit program has provided us with additional insights into how key suppliers manage modern slavery and other human rights risks. While the social audits to date have not identified specific modern slavery concerns, audit findings have highlighted a number of non-conformances in supplier practices. These non-conformances primarily related to workplace health and safety issues and deficiencies in record keeping.

We have addressed these non-conformances with the suppliers, including through supporting the supplier to remediate adverse findings and take up opportunities for improvements. For example, one audit for an Australian supplier identified discrepancies in payments to its workers, which had resulted in workers being underpaid. We engaged with the supplier who rectified the issue, including by repaying relevant workers.

The audit program has also provided opportunities for us to engage with suppliers around our expectations. For example, in one instance a supplier indicated they were reluctant to allow workers to speak with the audit team without a management representative present. We subsequently engaged with this supplier to set out our expectations and why it was not appropriate to conduct worker interviews with management present.

We are also conscious that supplier audits can be resource intensive for the supplier and that it is important Optus invests time and resources to understand and engage with suppliers on the results. This is why we are carefully scaling our audit program to include additional suppliers, in line with our risk-based approach. We are also reviewing how we can continue to ensure senior executive visibility of audit findings and how they are addressed.



## Managing modern slavery risks for key supplier categories

**In addition to our standard procurement processes, we also work closely with key suppliers to support our efforts to manage modern slavery risks.**

### Contact centres

We work closely with our third-party Business Process Outsourcing suppliers in India and the Philippines to help provide a safe and fair working environment for approximately 5,000 workers in these locations.

During the reporting period, we undertook in-person visits to key contact centre sites. This enables us to speak directly with workers and monitor practices on the ground.

More broadly, we continue to engage with our contact centre suppliers through annual surveys, periodic virtual events and targeted sessions with contact centre workers to seek their direct feedback.

### Partner retail stores

We undertake financial and probity checks for prospective partners and set clear standards for Partner conduct through our franchisee 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. Any compliance issues would generally be identified and managed by our retail teams on a day-to-day basis.



## Training for our people

**Training is a key component of our modern slavery response because it helps us to ensure our people understand the role they can play in preventing and managing modern slavery risks, including by safely reporting concerns. As part of our training approach, we use a modern-slavery e-learning module to maintain a base level of awareness for key staff across the business. We supplement this module with targeted training sessions for relevant staff.**

### Modern slavery e-learning module

Completion of this module every two years 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. In addition, we also formally included the e-learning course in the induction program for workers at our contact centres. While contact centre workers were previously required to complete the training post induction, this change ensures the e-learning is completed before they commence in their role.

The Sustainability team monitors completion rates for this training across the business for reporting. During the reporting period, approximately 7,500 people completed the e-learning module.

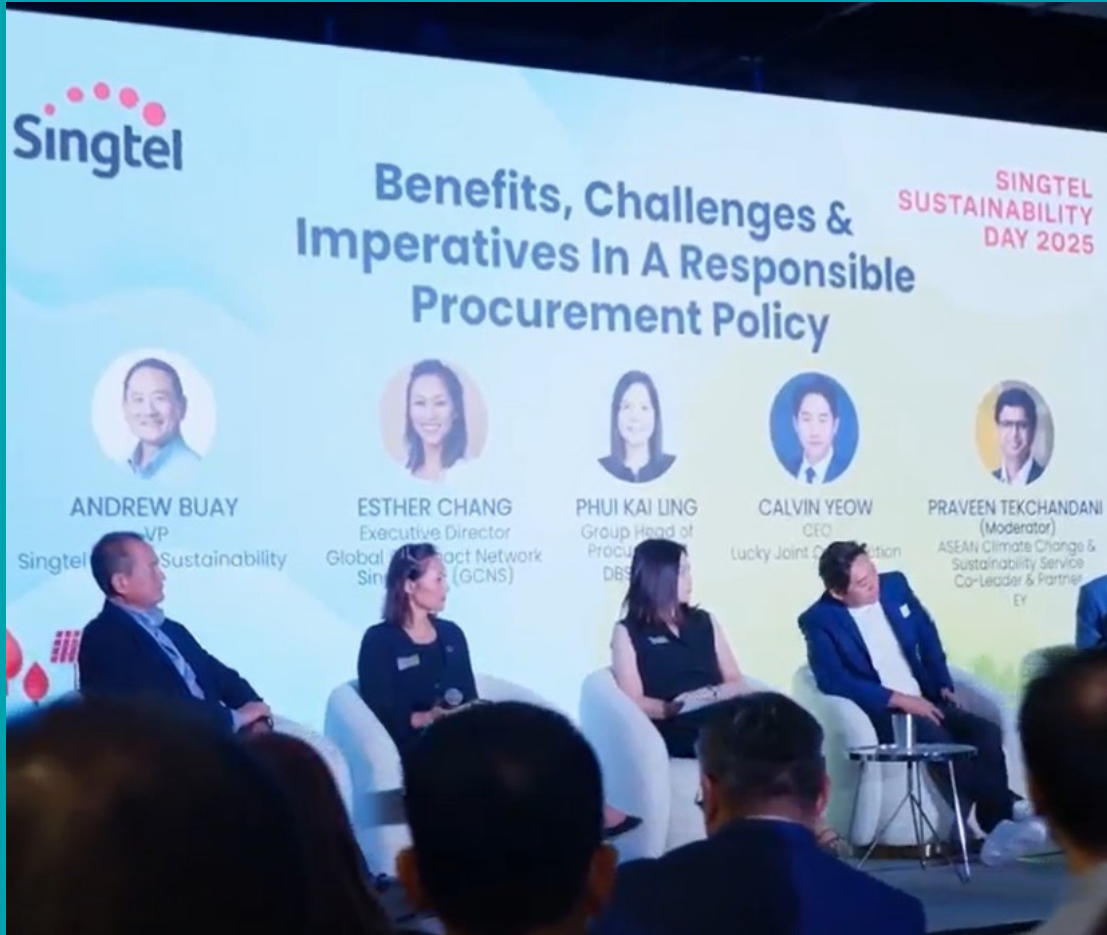
### Modern slavery training for supplier-facing staff

We also delivered a targeted modern slavery training session for key supplier-facing staff during the reporting period. Participants included vendor and category managers from across Optus. The training was delivered in collaboration with an expert business and human rights advisory firm and included information about modern slavery red flags, suggested questions to ask suppliers during contract management meetings about their modern slavery response, and how to apply Optus' enhanced modern slavery contract clauses.





## Supplier capability building



### Supporting suppliers to implement the Singtel Group Supplier Code of Conduct

We recognise the importance of engaging with suppliers to support them to understand our expectations and requirements related to modern slavery risk management. Through the Singtel Group website, suppliers can access a free e-learning video about the Supplier Code of Conduct. The video includes a specific section on modern slavery that explains relevant requirements in the Supplier Code of Conduct, as well as key modern slavery red flags, such as excessive working hours. The video also addresses other issues that can give rise to modern slavery risks, such as inadequate accommodation for workers and fair wages.

During the reporting period, we also engaged with suppliers through the Singtel Sustainability Day, which highlighted the launch of the new Singtel Group Responsible Procurement Policy. Over 120 key suppliers participated in the day, which included discussion of a range of broader human rights issues.

### Development of Pathway to Respecting Human Rights and Addressing Modern Slavery Risks – Supplier Handbook

In May 2024, as part of the Telco Together Foundation's Modern Slavery initiatives, Optus had the opportunity to contribute to the development of a telecommunications-specific resource designed to support suppliers across the sector in addressing modern slavery and broader human rights risks.

This initiative aimed to:

- Equip suppliers with the knowledge and tools needed to translate human rights due diligence from theory into practice;
- Promote a coordinated industry approach focused on prevention, transparency, and remediation of human rights issues; and
- Strengthen capacity-building efforts to accelerate the adoption of responsible business practices and sustainable procurement across the telecommunications sector.

Optus and other Telco Together Foundation member representatives collaborated to define the scope and content of a Modern Slavery Best Practice Handbook—a practical, action-oriented guide that outlines clear steps for telecommunications suppliers to identify, assess, and manage human rights risks (including modern slavery) within their operations and supply chains.

Developed in partnership with the Telco Together Foundation and Edge Impact, the handbook was launched in February 2025 and is intended as a go-to resource to help suppliers embed human rights considerations into their day-to-day operations, progressively building impact and maturity over time.

# Collaboration and stakeholder engagement

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. This included attending a number of meetings and events throughout the reporting period.

Forum	How we engage	How this engagement has supported our modern slavery response
UN Global Compact Network Australia (UN GCNA) Modern Slavery Community of Practice	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' Senior Director, Group Sustainability is also a member of the UN GCNA Board.	Optus' membership of the Modern Slavery Community of Practice has helped us to better understand various other industry sector practices, challenges and learnings on how we can improve our modern slavery risks.  During the reporting period, we also contributed to the development of a UN GCNA publication co-authored by Pillar Two: Business Integration of Human Rights Due Diligence in Australia: Modern Slavery and Beyond. The publication includes a case study from Optus about working with key internal stakeholders and building Board and executive 'buy in' for human rights risk management, including modern slavery. The publication was launched in June 2025.
Telco Together Foundation	Optus is a member of the Telco Together Foundation (TTF), an industry network that brings together 21 telecommunications organisations operating in Australia. Optus' Senior Director, Group Sustainability is also a member of the Telco Together Advisory Board.	During the reporting period, we worked with other Telco Together Foundation members and Edge Impact to develop a Modern Slavery Best Practice Handbook—a practical, action-oriented guide that outlines clear steps for telecommunications suppliers to identify, assess, and manage human rights risks (including modern slavery) within their operations and supply chains. The Handbook was launched in February 2025.
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 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.	We continued to engage with GSMA over the reporting period about broader sustainability issues.



## Grievance mechanisms and remediation

In line with the UNGPs, we are committed to providing for, or cooperating in, remediation where we identify that we have caused or contributed to human rights harm, including modern slavery. This commitment is set out publicly in our Optus Human Rights Statement.

The reporting channels that we have in place provide an avenue for workers in our operations and supply chain who have a concern about modern slavery to safely make a complaint. We understand that these mechanisms can only be effective if they are trusted and accessible and we continued to promote the Optus Whistleblower Hotline and other methods for raising concerns through relevant materials over the reporting period.

We also assess our suppliers' practices in this area through our social audits, which include criteria relating to reporting channels. We are also exploring scope to provide additional guidance to suppliers about establishing and maintaining trusted and accessible grievance mechanisms.



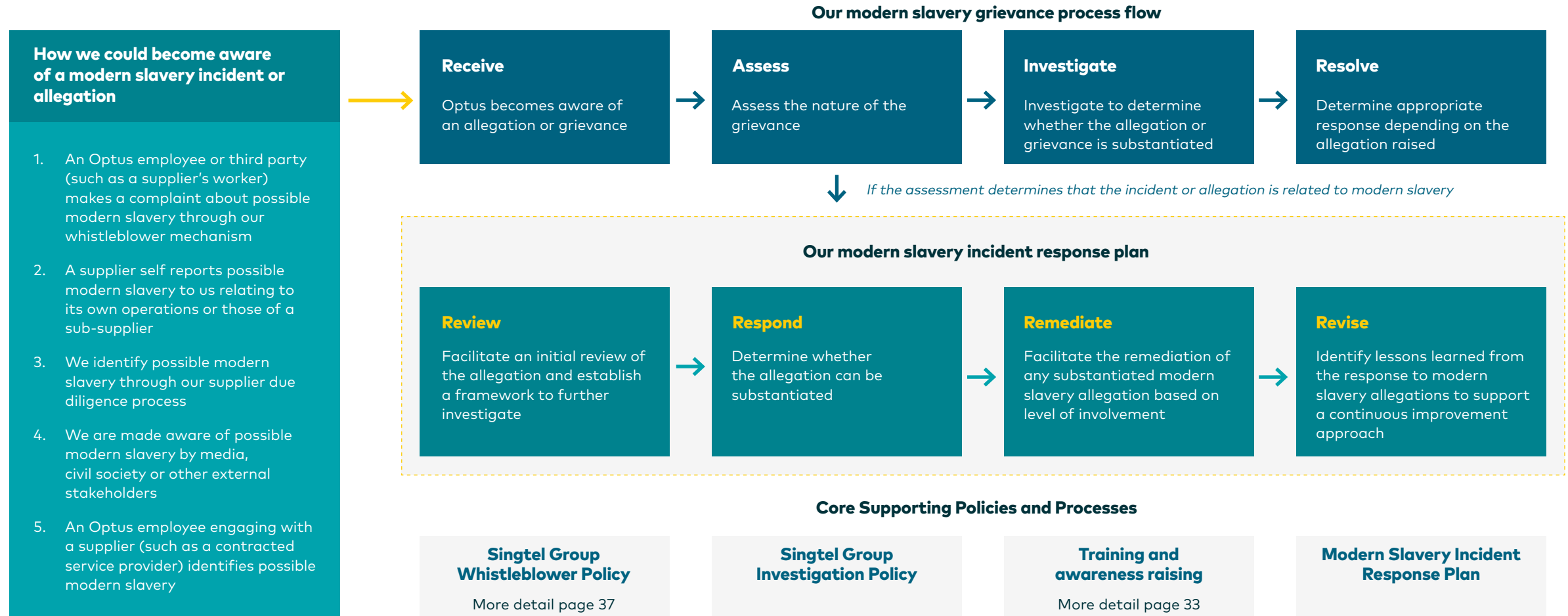


# Our whistleblower process

What it 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. The Optus whistleblower process, including the externally operated hotline service, is operated in accordance with the Singtel Group Whistleblower Policy, which provides all whistleblowers with protection from detrimental conduct, such as reprisals and retaliation.
Who can use it to make a report	All Optus employees and company officers, partners and their employees, contractors and authorised representatives of suppliers and suppliers' workers, people that used to be in one of these groups and family members of any person in one of these groups.
How it operates and how complaints can be raised	Optus' whistleblower process provides multiple channels for complainants to lodge reports. These include via email, online portal and phone number to our designated whistleblower service provider, or directly to members of the Optus Internal Audit team, and persons or parties identified in the Singtel Group Whistleblower Policy as Eligible Recipients for complaints concerning Optus. The persons designated as Eligible Recipients include designated members of the Optus senior leadership team, the designated Whistleblower Investigations Officer and Whistleblower Protection Officer for Optus, members of the Optus Internal Audit team, certain specific roles such as Optus General Counsel, and certain external parties as required by the law in Australia concerning whistleblowing.
Safeguards	The Singtel Group Whistleblower Policy contains safeguards to protect the confidentiality of complaints and to protect complainants from detrimental conduct, such as retaliation. The Policy allows complaints to be reported anonymously and we commit that we will never attempt to establish a complainant's identity if they have withheld it. The structure in place allows for confidential communication with a complainant through a portal that protects anonymity.
How many modern slavery complaints were received through this whistleblower process in FY25	In FY25, we received 66 whistleblower complaints. All complaints received through the whistleblower process were assessed prior to commencing any investigation. None were related to modern slavery.



## Our approach to grievance management



# 4.

## 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.





## How our modern slavery response has evolved since 2019

In addition to the activities set out in this statement for the reporting period, we have achieved a range of key milestones in our modern slavery risk management since 2019. Tracking our effectiveness helps us to improve and build on our response both now and into the future.

<b>2019-20</b>	Undertook modern slavery risk assessment of suppliers using expert third party	Established modern slavery working group	Developed modern slavery action plan to guide response	Revised contract clauses to address modern slavery
<b>2020-21</b>	Launched Human Rights Statement	Implemented modern slavery e-learning module	Revised Supplier Code of Conduct to address modern slavery	Signed Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery
<b>2021-22</b>	Undertook salient human rights assessment with expert third party	Developed Modern Slavery Incident Response Plan	Delivered targeted modern slavery training to over 100 Optus team members	Rolled out targeted supplier questionnaire
<b>2022-23</b>	Enhanced our modern slavery e-learning module	Commenced development of a Supplier Engagement Roadmap	Conducted a detailed review of an Own Brand modern supplier and also engaged with a uniforms supplier to better understand their modern slavery response.	
<b>2023-24</b>	Enhanced our supplier due diligence by implementing a social audit program and trialling a third party risk screening tool.	Delivered tailored training to relevant vendor and category managers about engaging with suppliers on modern slavery	Launched a new Responsible Procurement Policy and uplifted the Singtel Supplier Code of Conduct	Supported the development of UN GCNA report on human rights due diligence and the Telco Together Foundation Modern Slavery Best Practice Handbook

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 below:

Effectiveness criteria	How this criterion helps us understand effectiveness
The successful implementation of action items under our Modern Slavery Action Plan	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.
The number of targeted (role specific) staff who have completed our modern slavery e-learning module and feedback from staff who have completed other training sessions, including the e-learning	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
The number of social audits completed as part of our audit program and the non-conformances identified and addressed.	Tracking the results from our social audits helps us to understand whether these audits are effective in identifying issues for our suppliers and providing a process for these issues to be addressed.
The number of modern slavery-related complaints reported through our Whistleblower Process or to other channels and whether any cases were substantiated	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
Any feedback from our suppliers, staff, business partners or other stakeholders	Internal and external feedback helps us to understand different perspectives on our modern slavery response and identify opportunities for continuous improvement
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.	Participation in collaborative forums helps us to continually improve and better understand how our response compares to key peers across the telecommunications sector and more broadly with the aim of adopting other best practice initiatives.

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.

# 5.

## Consultation





## Consultation to develop Optus' Modern Slavery Statement

Reporting entities (and other controlled entities) covered by this Statement all share the same company secretary, whose team was consulted in developing the Statement.

The overall development of the Statement was led by the Working Group, which includes representatives from key functions across the Optus group relevant to modern slavery risk management, including Sustainability, Responsible Procurement, Risk, Legal, Internal Audit, Global Contact Centres, Process and Operational Excellence, and People and Culture. The Working Group members contributed to and reviewed a draft of the Statement. This consultation process helped to further ensure that the statement reflects the modern slavery risk exposure and risk management activities of the reporting entities and owned and controlled entities covered by the statement.

## 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.



# Appendices





# Appendix 1: How our statement addresses the mandatory reporting criteria

Modern slavery act requirement	Reference in this Statement
Identify the reporting entity	Appendix 2
Describe the reporting entity's structure, operations and supply chains	Our structure, operations and supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Identifying our modern slavery risks
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	Identifying our modern slavery risks Our actions to manage our modern slavery risks
Describe how the reporting entity assesses the effectiveness of such actions	Assessing our effectiveness
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	Consultation
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Our progress to date (including future plans)





## Appendix 2: Reporting Entities

- 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 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 telecommunication services
- Optus Vision Pty Limited: Provision of telecommunications services
- Amaysim (Amaysim Mobile Pty Limited): Provision of telecommunications services

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