



Yes OPTUS

Optus Modern Slavery Statement 2021



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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 2021 financial year reporting period (1 April 2020 – 31 March 2021).¹

The Optus group of companies are part of the Singtel Group.² 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 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 relevant functions across the Optus group of companies, such as Legal, Procurement, Risk, Internal Audit, People and Culture, Optus Enterprise, 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, in Singtel Optus Pty Limited's capacity as a 'higher entity' under the MSA and it is signed by the Singtel Optus Pty Limited Chief Executive Officer.³

We welcome feedback on our Statement at: sustainability@optus.com.au

¹The reporting entities covered by this joint Statement are listed in Appendix Two.

²The Singtel Group is Singapore Telecommunications Limited (Singtel) and the group of companies owned and/or controlled by Singtel.

³ 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. 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.



Our world is made up of over seven billion people, each one of us unique. We are united by a need to connect with each other, a need to be heard, and ultimately, a need to have a more inclusive and optimistic world for everyone.

Since Optus was founded in 1991, we have been true to our purpose in giving people options for how they connect with the world around them. 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.

Modern slavery is one of the worst violations of an individual's dignity and human rights. Optus believes there is no place for it in our world and because of this, we are committed to ensure we understand, assess, address and monitor any potential modern slavery risks in our operations and supply chain.

In what is now our second Statement, we outline some of the concrete steps we have taken in the last year to assess and address potential risks. We are engaging with our key suppliers and collaborating with our peers to take

a proactive approach to this global issue. Optus leads by example to help influence, share knowledge and strengthen our response to modern slavery as a business community. We are also increasing awareness and understanding within our business operations to ensure those most vulnerable are not exploited. We will continue to undertake our due diligence on higher risk supplier categories in the coming year, as part of our commitment to the United Nations Guiding Principles on Business and Human Rights.

While we have made good progress in our Modern Slavery Action Plan, we are continually striving to learn and improve. As a business, and as a member of the global community, we recognise there is more work to be done in the coming years as we deepen our engagement and due diligence on modern slavery risks in our extended supply chain.

We are pleased to share this Statement with you and welcome any feedback that you may have about our approach and Action Plan.

This Statement was approved by the Board of Singtel Optus Pty Limited on the 28th of September 2021.



Kelly Bayer Rosmarin
Chief Executive Officer



CEO
message





Introduction

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

Modern slavery happens when 'coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom'.⁴ Modern slavery involves serious human rights abuses and can happen here in Australia, as well as overseas. The United Nations (UN) and Walk Free Foundation [estimate](#) that over 40 million people around the world are victims of modern slavery.

We are a signatory to the [UN Global Compact](#), which is the world's largest corporate sustainability initiative based on ten core principles for action. We are also proud to support the [UN Sustainable Development Goals](#), which set out the international community's shared aim to eradicate modern slavery by 2030. We understand that businesses have a key role to play in achieving this goal and Optus is committed to doing our part.



This Statement explains the concrete steps we have taken over our 2021 financial year to assess and address actual and potential modern slavery risks in our operations and supply chains. It also explains how we assess the effectiveness of our actions and where we plan to enhance our response in the future.

This Statement is the second Statement we have published under the MSA. In line with our focus on continuous improvement and transparency in relation to our modern slavery risk management, this Statement builds on our first Statement in a number of areas, including:

- providing additional detail about our operations and supply chains
- setting out additional context about potential modern slavery risk areas
- including a range of case studies to provide a practical overview of how we are responding to modern slavery, including through engagement with key suppliers, and
- explaining in more detail how we are collaborating with key business peers to strengthen our response.

⁴This definition of modern slavery is taken from the Australian Government's [official guidance material](#) about the MSA.



Our vision, purpose & values

At Optus, our vision is to be Australia's most loved everyday brand with lasting customer relationships. This is why we focus our efforts towards initiatives that make a real difference, including taking action on modern slavery.

Our purpose is to power optimism with options. Having the freedom to make choices in life is empowering and grows optimism.

Our five essential values guide our actions and support our vision and purpose. Our values of integrity, personal excellence, challenger spirit, teamwork and customer focus are incompatible with modern slavery and align with our commitment to prevent and address any modern slavery risks in our operations or supply chain.

In particular, our commitment to integrity means we work to treat everyone with dignity, fairness and respect. We also strive to conduct our business responsibly and with the highest ethical standards.

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These five essential values guide our actions as we move toward our vision of creating a more connected Australia and providing outstanding customer experience.



Customer Focus

Treat each customer with dignity and respect: listen to, anticipate and satisfy their needs while simplifying their experience.

Deliver quality products & services to sustain and grow value.



Challenger Spirit

Embrace change and challenge the status quo.

Continue to break new ground and innovate.

Compete vigorously but fairly.



Teamwork

Collaborate holistically across our teams, and the broader business.

Respect and value diversity and the contribution of every person.

Encourage open discussion.



Integrity

Honour our commitments, be accountable and take responsibility for our actions.

Treat everyone with dignity, fairness and respect.

Conduct business with the highest ethical standards.



Personal Excellence

Take responsibility for our growth and development.

Always seek feedback and aim for higher standards.

Recognise individual potential and contribution.



Our structure, operations & supply chain

Optus is the second largest provider of telecommunications services in Australia in terms of revenue. We employ more than 7,000 people nationally⁵, who together are a reflection of our diverse and multicultural country and customer base.

Optus is a fully integrated telecommunications provider with more than 10 million customers. We deliver a comprehensive range of products and services to the Australian retail telecommunications market⁶, small and medium sized businesses, enterprise and government customers. We also service the telecommunications market through our wholesale business, which sells access to our communications network to other telecommunications service providers.

The products and services we provide include:

- local, long distance and international, mobile and fixed line voice
- broadband
- multimedia entertainment and technology services
- satellite services, and
- converged business telecommunications applications and solutions.

We also offer insurance services (for certain types of mobile telecommunications devices), which are provided by a separate Optus entity (Optus Insurance Services Pty Limited).

Our key brands and trading names include: Optus, Optus Sport, Optus Fitness, GoMo, and amaysim.

⁵This figure refers to employee numbers by headcount.

⁶We primarily operate in Australia but also carry on business in New Zealand, which relates to the provision of satellite services.

Did you know?

Since 1985, Optus has successfully launched ten satellites and operated thirteen spacecraft.

We are the only network provider in Australia to own and operate our own fleet of satellites, and have the largest fleet of satellites in Australia and New Zealand. The Optus Satellite fleet currently consists of five geostationary satellites providing satellite services across Australia and New Zealand, and to McMurdo Sound in the Antarctic. The Optus 10 satellite is the most recent satellite to launch, built by Space Systems/Loral and launched by Arianespace in French Guiana in September 2014.



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. Optus' network offers an advanced technology platform capable of delivering integrated communications, information and entertainment services. The Optus 4G network provides coverage to 98.5% of the Australian population, and rollout of the 5G network is underway.

During the reporting period, Optus owned and operated the majority of our network infrastructure. We also use some wholesale services provided by third parties. This includes the Australian National Broadband Network (NBN), and some shared mobile tower infrastructure with other operators such as TPG-Vodafone. We provide services both directly to end users, and also as a wholesaler to other service providers. We also have agreements with business partners overseas who provide roaming services to our customers traveling 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.

In addition to our 7,000+ employees, we have over 350 contractors from 28 companies who work within our Australian business operations providing professional or administrative services, and over 13,000 external services workers. This includes over 4,000

workers employed and managed through third party contact centre providers in India and the Philippines, as well as other contracted service providers such as cleaning and security services. Further information about our contracting arrangements is outlined in the description of our supply chains on [page 10](#).

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

For more information about Optus, please see the [Optus 2021 Sustainability Report](#).



Our structure & operations



30 years
in Australia



10 million+
customers

300
Optus
stores

around Australia
(approximately
2/3rds of our stores
are managed by
partner groups)

7,000+
team
members



Our
services
include:



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



Broadband



Multimedia entertainment and technology
services



Satellite services



Converged business telecommunications
applications and solutions



98.5%

of the Australian
population covered
by our 4G network
and our 5G rollout
is underway



350+
contractors
within our
Australian
operations

Such as workers engaged
in professional or
administrative roles on
Optus sites and under
Optus management

13,000+ 
external
services workers

Such as workers engaged
in facilities management or
offshore contact centres



Our supply chain

Optus has a large and highly diverse supplier base, and procures a wide range of goods and services both domestically and internationally. In FY21, this represented 1,233 direct suppliers.

There is significant diversity within our supplier spend. We have a smaller number of suppliers, including large multinational businesses, that we have significant spend with (such as suppliers of our electronic devices), and a large number of suppliers with whom our spend is relatively small (such as catering or travel services). This variation in spend can affect the leverage we have with suppliers to influence their actions to assess and address modern slavery risks, however we are exploring other ways to increase our influence even where our spend is low.

Within our supply chain, 80% of our spend is across the five key supplier categories listed below. Within these categories, we have over 100 key Tier 1 suppliers with whom we have a direct contracting relationship.

1. Mobile Devices: including mobile phones and tablets provided to Optus customers and employees, as well as wearable devices and equipment installed at customer sites.

2. Network and Equipment: including equipment used to power Optus network infrastructure including 5G and satellite infrastructure.
3. Technology Professional Services: our partners supporting and delivering our strategic IT projects and IT rationalisation programmes.
4. Building and Construction: infrastructure investments including towers and our retail footprint.
5. Professional Services: includes organisations who provide us with strategic and consultancy services.

Optus has a centralised procurement function, which oversees all material supplier spend throughout the organisation by category and across key business functions. Optus procurement 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.





Deep dive: procurement of devices

Of the top five spend categories, Optus' largest spend is on devices – such as mobile phones, tablets, modems and equipment installed at customer sites. Optus does not manufacture these products but procures them directly from the manufacturer for resale to our retail and business customers.

Optus procures devices from major multinational companies, including Apple and Samsung. These devices can be manufactured in a range of countries, including China and South Korea. Each device includes large numbers of components sourced from around the world, including screens, semiconductors, and batteries.

We recognise that there may be components used in electrical goods such as devices that may involve modern slavery risks. For example, mineral ores such as tin, tantalum, tungsten and gold are used in electrical components and circuitry. In some cases, these minerals may be produced in conflict affected countries using forced labour or the worst forms of child labour.

The extensive supply chains involved in the production of electronics can make it difficult to evaluate the modern slavery risks associated with these products. We clearly communicate our expectations in relation to modern slavery to our suppliers who provide devices to us, including through the use of modern slavery contract clauses. Many of these suppliers also have clear policies and practices relating to managing human rights and modern slavery risks in their supply chain.

We have also taken additional steps to assess how our devices suppliers manage risks relating to human rights, including modern slavery and conflict minerals, by requesting certain devices suppliers complete our supplier self-assessment questionnaire.

As next steps, we are engaging with a number of device suppliers to follow up on the initial assessments and seek more detail. Where this does not meet our standards, we will work through 3rd party assessors to undertake further due diligence on these suppliers and take appropriate action.



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 Rights⁷ 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. We also recognise that modern slavery risks are not static and may change over time, including due to factors such as COVID-19.

We consider that our supply chain may include a comparatively higher exposure to a range of modern slavery risk areas. To better understand these potential risk areas, we engaged a global business risk and sustainability

solutions provider in 2019 to assess our then 1,629 suppliers, based on global risk and supply chain databases. This assessment enabled us to better understand risks through both product and category perspectives, as well as inherent country risk relating to each supplier. Further information about this risk assessment process is set out in our [2020 Modern Slavery Statement](#).

In 2020, Optus and Singtel also jointly undertook an organisational life cycle assessment to assess various environmental, social and governance (ESG) risks, including human rights risks (such as modern slavery). We are using these assessment findings to guide our supplier engagement as outlined in the actions steps on [page 13](#). For further information refer to the [Singtel Group's Sustainability Report](#).



⁷The UN Guiding Principles on Business and Human Rights are the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activities.





In 2020,

Optus and Singtel also jointly undertook an organisational life cycle assessment to assess various ESG risks, including human rights risks (such as modern slavery).

We are using these assessment findings to guide our supplier engagement as outlined in the actions steps. For further information refer to the Singtel Group's Sustainability Report which summarises some of the risks identified from that exercise.

Social risk areas for the Singtel Group

This information is sourced from the Singtel Group Supplier Sustainability and Life Cycle Assessments and provides an overview of the key supplier social risk focus areas and action steps for the Singtel Group. Suppliers represented below are from the Singtel Group's top three material product groups: Devices, Network Equipment and IT hardware/software consisting of 20 suppliers representing 46% of the total Singtel Group procurement spend. For more information see the [Singtel Group Sustainability Report](#).

Key Focus Areas	Our Action Steps
<p>Conflict Minerals</p> <p>Eight suppliers have a conflict minerals statement and four have established a related policy, report and due diligence process.</p>	<p>We will work with our suppliers to monitor the use of conflict minerals and encourage the adoption of ethical sourcing principles.</p>
<p>Forced and Bonded Labour</p> <p>Six suppliers have disclosed a modern slavery/human rights statement and three have established a related policy and due diligence process.</p>	<p>We will require full compliance from our suppliers to disclose their policy and position, and monitor modern slavery in their operations and supply chain following global and national standards. We expect our suppliers to disclose any incidents of modern slavery.</p>
<p>Decent Working Conditions, Health and Safety</p> <p>Six suppliers have disclosed a health and safety as well as labour/human rights statement and established a related policy and due diligence process.</p>	<p>We will require full compliance from our suppliers to ensure the provision of decent working conditions in their operations and supply chain and comply with global and local laws and regulations governing workers' health and safety.</p>
<p>Privacy Rights</p> <p>Six suppliers have disclosed a privacy rights statement and established a related policy and due diligence process.</p>	<p>We will require full compliance from our suppliers to develop a formal privacy rights statement and/or policy and disclose privacy risks and incidents that may affect our supply or our customers.</p>





In 2021,

We continued to assess our potential modern slavery risks in both our operations and supply chain.

As outlined on this page, 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.

Potential modern slavery risk areas for the telecommunications sector

The potential risk areas outlined below 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 25](#).

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 how we engage with our contractors is set out on [page 10](#).

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 21](#).

Risk area: Procurement of products from suppliers

Our 2019 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 11](#).



Policy & governance

Our approach is to empower our people across all departments and divisions with the necessary tools and processes to help identify, assess and address human rights risks, including modern slavery risks.

Policy and procedures

Optus has policies and procedures in place which underpin the way we engage with our people and suppliers. Our relevant policies are outlined to the right.

Policy	How is the policy relevant to modern slavery?	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.	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.
Procurement Policy	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 Optus' modern slavery policy.	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.
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. 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.
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 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.
Employment policies and frameworks	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

We recognise that taking meaningful action to assess and address modern slavery risks requires ongoing collaboration across our business. In 2020, we formed a Modern Slavery Working Group that includes senior stakeholders from across the business to help implement our Modern Slavery Action Plan.

The Modern Slavery Working Group is overseen by the Vendor and Supply Chain Risk Management Executive Steering Committee, which reports into the Optus Executive Risk Committee (ERC). The ERC is chaired by our CEO and is a governance role delivered by the Optus Executive Committee (ExCo). ExCo has oversight of – and is required to endorse – all related actions, recommendations and policies including the Human Rights Statement, which support the implementation of our Modern Slavery Action Plan. ExCo reports to the Singtel Optus Pty Limited Board, which oversees Optus’ response to modern slavery, including endorsing the Modern Slavery Action Plan. More information about the Modern Slavery Working Group and Action Plan is set out on [page 17](#).

The Optus group of companies are wholly owned subsidiaries of the Singtel Group. All key risks, including vendor and supply related risks, are also defined within the Singtel Group Risk Management Framework. Key risks that are identified and managed by the Optus ERC are also reviewed and reported to the Singtel Risk Management Committee (RMC) and the Singtel Board Risk Committee (RC). The RMC and the RC support the Singtel Board in terms of risk governance and oversight in line with the Singtel Group’s risk appetite and risk tolerances.

Optus’ Group Sustainability is responsible for leading the Optus Modern Slavery Working Group and Modern Slavery Action Plan, in collaboration with key stakeholders, and makes recommendations and progress updates to the RMC, RC and the Board of Directors of Singtel Optus Pty Limited, as required.

Modern Slavery and Human Rights Governance

Optus’ Modern Slavery Statement, Human Rights Statement, Modern Slavery Action Plans and progress has been reviewed and discussed, and will continue to be at the most senior levels within the business including the Optus Executive Committee, Optus Board and Chairman.





Case study

Modern Slavery Working Group

The Optus Modern Slavery Working Group supports our response to modern slavery by overseeing the implementation of 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 commenced a process to update the Modern Slavery Action Plan by identifying future actions over the next three years. This will support us to further refine and expand our response to modern slavery.

The Working Group includes representatives from key functions, including Sustainability, Legal, Procurement and other relevant business functions and is guided by formal Terms of Reference. In addition to overseeing the implementation of the Modern Slavery Action Plan, the Working Group is also responsible for supporting the development of the Optus Statement and identifying and sharing good-practice responses to modern slavery from the telecommunications sector and more broadly.

The Working Group helps us to integrate our response to modern slavery across key areas of the business through the Modern Slavery Action Plan and provides a forum to monitor the impact and effectiveness of our actions, reflect on lessons learned, and identify and assess new and emerging issues. During the reporting period, the Working Group met and communicated regularly.

The Working Group complements other existing functions and responsibilities across Optus. As such, it is not responsible for responding to modern slavery complaints or incidents or managing operational responses to key modern slavery risk areas, including commissioning or implementing audits.

“The Working Group has brought together people from the business units that manage Optus’ modern slavery exposure on a day-to-day basis. The group provides an open forum where we can build a common approach to how we manage modern slavery concerns — inside our business and in our supply chains.”

Working Group member



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.

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.

For example, we undertake a range of probity checks on our Partners and set clear expectations for ethical business behaviour in our Partner agreements. Further information about our Partner arrangements is set out on [page 20](#).

More broadly, we prioritise building strong relationships with key suppliers to facilitate open, two-way communication about issues such as modern slavery. For example, we meet regularly with the service provider responsible for security across Optus sites. We also have regular engagement with our cleaning and other facilities management providers, which undertakes annual audits of subcontracted providers to verify they are paying their workers appropriately.

We also value dialogue with our corporate customers and regularly respond to customer requests for information about our modern slavery approach.

Enhancing our supplier management framework

Optus is committed to addressing supplier management risks. As part of this agenda, a major programme is underway to create an enhanced supplier management framework enabled by technology, enhancing Optus' ability to manage compliance, performance and risk across our suppliers. By improving our understanding of our supply chains, this enhanced supplier management framework will help inform our modern slavery risk management approach.



Case study

Supplier self-assessment questionnaires

Supplier self-assessment questionnaires (supplier questionnaires) can help to build businesses' understanding of modern slavery risks in their supply chains. At Optus, we use supplier questionnaires to help us better understand how selected suppliers are managing potential modern slavery risks.

Among other things, our supplier questionnaire asks suppliers to:

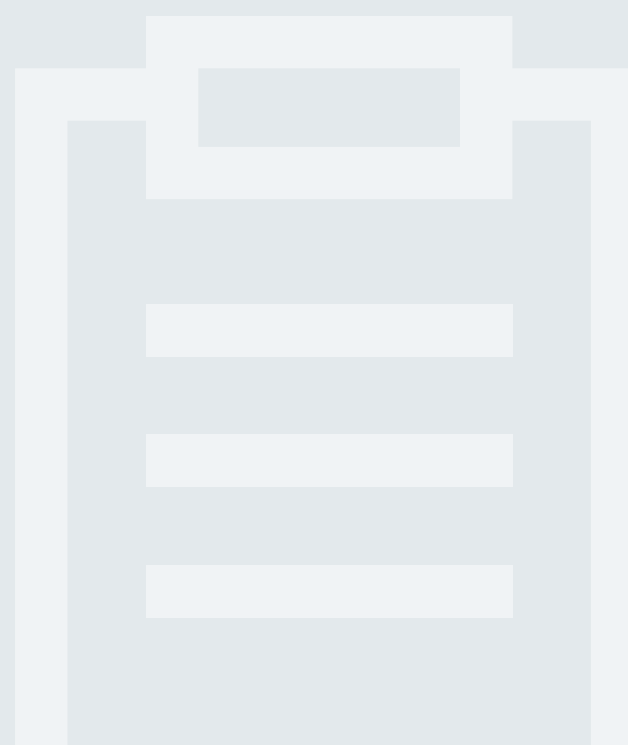
- indicate whether they have policies in place to address modern slavery, as well as to address issues that may contribute to modern slavery, such as: freedom of association and collective bargaining; working hours; and discrimination
- confirm whether they provide training for officers, employees or agents about modern slavery and other human rights issues
- indicate whether they have a comprehensive worker health and safety management system in place

- confirm whether they have due diligence guidance to ensure responsible mineral supply chains for conflict minerals, and
- clarify whether they require their sub-suppliers to comply with relevant modern slavery laws.

All new Optus suppliers must complete supplier questionnaires as part of the onboarding process. During the reporting period, we also requested high-risk suppliers complete our supplier questionnaire. The results from these questionnaires help inform our modern slavery risk management and identify areas where further engagement with suppliers may be required.

Supplier questionnaires are an important tool to help businesses manage potential modern slavery risks. However, our experience suggests that completion rates and quality of responses can vary between suppliers, and we also recognise that the questionnaire process may be challenging for smaller or less sophisticated suppliers.

As part of our Modern Slavery Action Plan, we are exploring options to further enhance our engagement with suppliers on modern slavery issues, including by considering options to further refine our supplier questionnaire process.





Case study

Engaging with our franchisees and licensees to manage modern slavery risks

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.

We carefully screen all prospective Partners, which includes full financial and probity checks. These checks can help identify potential modern slavery risk factors, such as prior convictions for illegal conduct. Our prospective Partners also undergo multiple levels of interviews and individually work in Optus stores so that we can further assess their suitability for the role.

In addition, we set clear standards for Partner conduct through our franchise and licensee agreements, including compliance with relevant laws and work, health and safety requirements. We also provide guidance and support to Partners, including through access to our e-learning (including the modern slavery module) and other training.

Over 98% of the franchisee and licensee groups have completed the modern slavery e-learning module to date. During the reporting period, we also engaged a law firm to provide training to Partners on payroll compliance.

We also have a high level of visibility of Partners' businesses which helps us to identify and manage any potential compliance issues. We have monthly and quarterly performance meetings with our Partners, as well as annual reviews. Optus staff regularly visit all our branded retail stores and we also undertake periodic state manager visits as well as other activities, such as mystery shopping.

Our franchise and licensee model also governs key procurement activities undertaken by our Partners. 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. This ensures that any potential modern slavery risks associated with these procurements are addressed through Optus' supplier risk management framework. Partners'

staff are also responsible for instore cleaning and our Partners do not use third party cleaning providers for regular routine cleaning activities.

Our Partners and their employees also have access to the Optus Whistleblower Hotline, which offers a place to report any unethical and inappropriate conduct or concerns such as fraudulent, corrupt, or illegal activity, including potential complaints related to modern slavery.



Case study

Engaging with our contracted cleaning services provider to manage modern slavery risks

We have contracted BGIS for a five-year term to manage and deliver Optus' facility maintenance services across all facilities nationally. This includes the following services:

- cleaning and waste management services
- landscaping and garden maintenance, and
- general maintenance (handyman) services.

Our contract with BGIS clearly defines modern slavery with reference to the MSA and relevant criminal laws and sets out specific obligations in relation to managing potential modern slavery risks. This includes provisions relating to:

- compliance with relevant modern slavery-related laws
- notification of any circumstances within its operations or supply chain that could constitute an offence or breach of relevant modern slavery-related laws

- implementation of appropriate policies and due diligence procedures, and
- audits of the supplier's operations, facilities and working conditions, including obligations to remediate any issues identified by audits.

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.





Training

During the reporting period, Optus launched an e-learning module on modern slavery.

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. Over 95% of Optus people leaders including, retail and franchisee store owners, have already completed the module during the past year.⁸

The e-learning module includes information about:

- What is modern slavery
- Indicators of modern slavery
- How modern slavery can be present in business operations and supply chains
- What to do if you have any concerns

During the reporting period, we promoted this e-learning module to all staff through our internal newsletter and the annual learning fiesta for all staff where modern slavery was a dedicated session.

Modern slavery training was also specifically provided to directors within the Optus group of companies as part of the development of this Statement.

⁸ This figure is correct as at September 2021.



Reporting & investigation

Our Optus Human Rights Statement sets out our commitment to provide for or cooperate in, remediation where we identify that we have caused or contributed to human rights harm, such as modern slavery.

Optus has a number of channels that employees and suppliers (and suppliers' workers) can use if they wish to raise any concerns, including in relation to modern slavery.

The Singtel Group Whistleblower Policy is in place and applies to the management of whistleblower complaints at Optus. The policy covers reporting of concerns through a number of channels, including the Optus Whistleblower Hotline.

The [Optus Whistleblower Hotline](#) offers a place to report any unethical and inappropriate conduct or concerns, such as fraudulent, corrupt, or illegal activity. This includes any potential complaints related to modern slavery. The Whistleblower Hotline is an independent service operated by an external service provider and can be accessed by Optus employees, Partners and their employees, contractors, and

authorised representatives of suppliers and suppliers' workers. Complaints to the Whistleblower Hotline can be made anonymously by phone, email or online, and we have appropriate measures in place to protect the identity of any whistleblower.

All allegations received are investigated by an independent and objective investigation team. The investigations are conducted to maintain both the confidentiality of the matter investigated and to protect the identity of the whistleblower. The outcomes of investigations, but not the whistleblower's details, are reported to Optus senior management, and any findings of activities that are illegal or that breach Optus' regulatory obligations are reported to the relevant law enforcement or regulatory agency. Under the Singtel Group Whistleblower Policy, all whistleblowers are protected from detrimental conduct, such as reprisals and retaliation. The investigation process establishes both the facts in respect of any allegation and also identifies any internal control issues that may have led to the events. This ensures that, where necessary,

action can be taken to address both the immediate issue and any wider concerns.

During FY21, there were two such reports with possible modern slavery implications, both of which were investigated, and both of which were not substantiated as instances of modern slavery.



Case study

Promotion of whistleblower hotline to vulnerable workers

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. The UN Guiding Principles on Business and Human Rights set out eight criteria for the effectiveness of grievance mechanisms, including that mechanisms are known to all stakeholder groups for whose use they are intended.

During the reporting period, we highlighted how to reach our whistleblower line by developing a poster which was distributed across all Australian Optus sites. Copies of the poster were placed in areas readily accessible to workers vulnerable to modern slavery and other forms of worker exploitation, such as cleaners, security staff and hospitality workers.

The poster explained that the Optus Whistleblower Hotline gives anyone a safe way to report any wrongdoing or exploitation and emphasised that there is no place for modern slavery in our operations or supply chains.





Our work to support our contact centre workers during COVID-19

Modern slavery can happen in every country – including Australia. However, we recognise that the potential risk of workers being exploited may be higher in some countries than others.

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 work closely with our contact centre suppliers in those countries to ensure they meet the requirements of our Supplier Code of Conduct, comply with local government laws and regulations and have policies in place to prevent any activity occurring that might constitute modern slavery. This includes ensuring that they offer grievance channels, prohibit the employment of minors under the age of 18, and provide protection to employees from workplace bullying and sexual harassment.

We also engage regularly with our contact centre suppliers to help us identify and resolve any potential compliance issues. At an operational level, we have daily interactions with management and team leaders in the contact centre sites and we also organise regular formal update sessions with the senior management and team leaders to review performance and

discuss issues or concerns that have come to our attention. In addition to this engagement, we run quarterly surveys, periodic virtual events and targeted sessions with contact centre workers to seek their direct feedback.

We understand that the impacts of the COVID-19 pandemic have significantly 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.

Throughout the pandemic, we have engaged with our contact centre suppliers to ensure the safety and wellbeing of workers in our contact centres, including during periods of increased case numbers in India and the Philippines.

Key actions we have taken in collaboration with our contact centre suppliers include:

- Providing a work environment with social distancing and other health requirements, such as temperature screening, and provision of face masks and hand sanitisers

- Allowing for working from home in some circumstances
- Providing subsidised and/or dedicated transport to contact centre locations
- Support to subsidise vaccination costs for workers, and
- Support for medical costs associated with COVID care and quarantine.

Ensuring the safety and wellbeing of workers in our contact centres continues to be a priority for Optus and our partners.



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 contributed to the development of collaborative, business-led responses to modern slavery through three key forums.

Global Compact Network Australia Modern Slavery Community of Practice

As a signatory of the [UN Global Compact](#) since 2007, we are committed to upholding its ten principles including human rights and labour issues. As part of this commitment, we actively participate in the UN Global Compact Network Australia, 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.

Telco Together Foundation

Optus is a founding member of the [Telco Together Foundation](#), a unified platform that brings together 21 of the leading telecommunications organisations operating in Australia.

Through collaboration on a Modern Slavery Industry Impact Hub, the Foundation has been developing best practice approaches and case studies, assessment tools and training.

On 2 December 2020, the Foundation launched an '[Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery](#)', signed by Optus, amaysim, and four other telecommunications companies.

The Leadership Statement highlights the signatories' commitment to combating modern slavery and sets out five principles to guide their response. These principles include recognition of the importance of cooperation across the signatories' value chains and the need to work in partnership with suppliers.

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.



Measuring 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 modern slavery risks across the business' operations and supply chains; the capacity to address these risks through practical actions, such as supplier engagement and collaboration with stakeholders; and the development of processes to remediate 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 and through feedback from our Modern Slavery Working Group. Key criteria we use to assess our effectiveness include:

- The successful implementation of action items under our Modern Slavery Action Plan
- The number of staff who have completed our modern slavery e-learning module
- The number of modern slavery-related complaints reported to our Whistleblower Hotline (or other channels) and whether any cases were substantiated
- Any feedback from our suppliers, staff, business partners or other stakeholders
- Information about good-practice provided through collaborative forums such as the Modern Slavery Community of Practice and the Telco Together Foundation that can be used to benchmark our own processes

We are working to expand our approach to measuring effectiveness over 2021 as part of our work to update our Modern Slavery Action Plan.



Consultation

This Statement was prepared in consultation with each reporting entity covered by the Statement.

Reporting entities covered by this statement all share the same company secretary, who was engaged in developing the statement. Directors of each reporting entity, including Optus Cyber Security (OCS), were consulted on the development of the statement and implementation of the Modern Slavery Action Plan. Additional consultation was also undertaken with amaysim (which was acquired by Optus on 1 February 2021).

The overall development of the Statement was led by the Modern Slavery Working Group, which includes representatives from key functions across the Optus group, including Sustainability, Legal, Procurement, Risk, Optus Enterprise, Internal Audit, People and Culture, Retail and Service. Modern Slavery Working Group

members contributed to and reviewed multiple drafts of the Statement and discussed key issues at regular Working Group meetings.

This process, together with additional targeted engagement with selected business functions, such as Facilities, helped to ensure that the Statement reflects Optus' group-wide modern slavery risk management approach and the roles and responsibilities of relevant Optus subsidiaries. More broadly, Optus' cross-functional approach also helps to facilitate ongoing collaboration and consultation across the Group to further enhance its modern slavery risk management, including the implementation of the Modern Slavery Action Plan.





Looking forward

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:

- Further promoting the Optus Human Rights Statement to staff, selected customers and suppliers
- Developing a general FAQ on modern slavery and making this available to all Optus staff
- Developing tailored modern slavery education/training materials for key Optus business units and partners to complement the existing e-learning module
- Delivering 'deep dive' sessions with key suppliers in selected high-risk sectors to better understand potential risks and how the suppliers are managing these risks





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.

Modern Slavery Act requirement	Reference in this statement
Identify the reporting entity.	<ul style="list-style-type: none"> About this Statement (page 3) Appendix Two (page 30)
Describe the reporting entity's structure, operations and supply chains.	<ul style="list-style-type: none"> Our Structure, Operations and Supply Chain (page 7)
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"> Identifying our Modern Slavery Risks (page 12)
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"> Identifying our Modern Slavery Risks (page 12) Policy and Governance (page 15) Due Diligence (page 18) Training (page 22) Reporting and Investigation (page 23) Collaboration (page 26)
Describe how the reporting entity assesses the effectiveness of such actions.	<ul style="list-style-type: none"> Measuring our Effectiveness (page 27)
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"> Consultation (page 28)
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	<ul style="list-style-type: none"> CEO Message (page 4) Our Values (page 6) Looking Forward (page 29)

Appendix two

Reporting entities

The reporting entities covered by this joint Statement are:

- Singtel Optus Pty Limited
- Optus Networks Pty Limited
- Optus Mobile Pty Limited
- Optus Internet Pty Limited
- Optus Satellite Pty Limited
- Alphawest Pty Limited
- Ensys Pty Limited
- Alphawest Services Limited
- Optus Insurance Services Pty Limited
- Optus Wholesale Pty Limited
- Optus Satellite Network Pty Limited
- Optus C1 Satellite Pty Limited
- Optus ADSL Pty Limited
- Optus Vision Pty Limited
- amaysim¹⁰ (Amaysim Mobile Pty Limited)
- Optus Cyber Security Pty Limited

¹⁰ amaysim launched in 2010 and is now the largest mobile virtual network operator in Australia and the fourth-largest mobile service provider overall. Optus completed its acquisition of amaysim on 1 February 2021 and amaysim now operates as part of the Optus group. Employees of the amaysim business, contractors and suppliers have access to the Optus Whistleblower Hotline and modern slavery e-learning module. While continuing to manage suppliers separately, amaysim utilises the Singtel Optus Supplier Code of Conduct and supplier assessment questionnaire to ensure a consistent approach to managing modern slavery risks.





Appendix three

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). Trustwave is the global security arm of Singtel, NCS and Optus. Trustwave is a leading cybersecurity and managed security services provider that helps businesses fight cybercrime, protect data and reduce security risk. Offering a comprehensive portfolio of managed security services, consulting and professional services, and data protection technology, Trustwave helps businesses embrace digital transformation securely.

OCS employs approximately 200 employees in Australia and is headquartered in Sydney at the Optus Campus. Trustwave collectively employs substantially more employees in its overseas locations. These employees undertake a range of professional roles including product management, marketing, business development,

and cyber security services, consulting and analysis. Due to the professional, services-based nature of these 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 and key categories of spend included cyber security hardware, software services and licenses and outsourced professional services. 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 is 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.

More information about Trustwave is available on the Trustwave [website](#).



