

Modern Slavery Act Statement 2023

V::CUS

About this Statement

Vocus Group Limited is a reporting entity as defined by the Modern Slavery Act 2018 (Cth).

This Modern Slavery Act Statement has been prepared in respect of the financial year 1 July 2022 to 30 June 2023 (FY23). This Statement includes reference to actions undertaken in prior reporting periods to provide context for our current position in understanding and managing modern slavery risks. The Appendix identifies where information relating to the mandatory reporting criteria in the Modern Slavery Act can be found in this Statement.

No instances of modern slavery were reported or identified across our operations or supply chain throughout the reporting period.

This statement covers Vocus Group Ltd and each of its subsidiaries (“Vocus”, “we”, “us”). Vocus is owned by a consortium made up of Macquarie Asset Management (and its managed funds) and Aware Super. All staff are employed by Vocus, report to its executive management team and are subject to its governance framework.

Vocus’ General Counsel & Company Secretary is the company secretary of each of Vocus’ subsidiaries and was consulted with during the development of our Modern Slavery approach, as well as this Statement. The drafting of this Statement was led by our ESG team with input received from relevant functions including Procurement, People & Culture and Legal.

This statement is available at:

<https://www.vocus.com.au/about-vocus/social-impact/governance>

We welcome feedback on our Statement at:

esg@vocus.com.au

A message from our Chair and CEO

At Vocus, our purpose reflects who we are and what we do: “Building critical connections. Enabling better possibilities.” We believe connectivity should enable better possibilities for our people, our customers and for communities through the critical connections that we build. Ensuring that we are actively managing the potential risk of modern slavery across our operations and supply chain is fundamental to delivering on our purpose.

We do not tolerate any form of modern slavery in our operations or our supply chain. We are committed to implementing the governance, due diligence and risk management processes required to identify and address these practices if they occur, and to creating a culture that encourages our people and partners to raise potential concerns. We are also committed to building relationships with our customers, partners and suppliers across our value chain to ensure we are each operating with respect for human rights, and taking all steps necessary to identify and mitigate any shared modern slavery risks.

This Modern Slavery Act Statement – Vocus’ fourth – outlines the steps we have taken this year to understand, identify and reduce the risks of modern slavery in our operations and supply chain.

Throughout FY23 we increased the breadth and depth of our modern slavery governance and due diligence, including by broadening our risk assessment to a larger pool of potentially high-risk suppliers; introducing a rigorous modern slavery screening process for all new suppliers; rolling out our modern slavery training to a larger group of Vocus team-members; and by formalising our commitment to respect human rights, through the introduction of our Human Rights Policy.

We did not identify any instances of modern slavery in our operations or supply chain throughout the reporting period. However, we acknowledge that managing modern slavery risk is complex, and the risk landscape is ever evolving. We therefore remain deeply committed, in line with our purpose, to actively maturing our approach over time.



Ms Ellie Sweeney
Chief Executive Officer



Ms Penny Bingham-Hall
Chair of the Board

Our structure, operations and supply chain

As Australia's specialist fibre and network solutions provider, we own and operate more than 26,000km of secure, high-capacity fibre connecting all Australian mainland capitals, as well as connections to New Zealand, Asia and the USA. Our network also includes the 4,600km Australia Singapore Cable (ASC) from Perth to Singapore via Indonesia, the 2,100km North-West Cable System (NWCS) from Port Hedland to Darwin, and the 1,000km Highclere System, connecting the NWCS in Port Hedland, Western Australia to ASC.

We own a portfolio of well-recognised telecommunications brands that provide services to enterprise, government, wholesale, small business and residential customers across Australia. Our primary go-to-market brands are:

Consumer

dodo **iPrimus**

Vocus Network Services

VOCUS **© commander**



Through our consumer brand “Dodo”, we also supply electricity and gas to residential customers and small to medium businesses in select states in Australia. The electricity we supply customers is sourced from the grid via the Australian Electricity Market Operator, and our gas for supply to customers is purchased from upstream suppliers. We do not own any generation or distribution assets.

There were no significant changes to our operations in FY23:



We own and operate a ~26,000-km fibre network across Australia purpose-built and managed for business, wholesale and government customers



We have on-net access to over 5,500 buildings in Australia



We operate 17 data centres across Australia



We have over 600,000 consumer customers across our in-market brands: Dodo and iPrimus with ~900,000 services in operation



We have around 1,400 full-time, part-time, and casual employees in Australia. Of these, 96% are permanent employees.



We have around 900 team members in the Philippines employed by a third-party providing a range of functions, including consumer customer support and back-office operations.

Further to our current operations, we have committed to investing one billion dollars over five years to deliver on major projects that will complete our national fibre backbone, connecting all mainland capital cities, and adding additional layers of redundancy and resilience. These projects include:

- **Project Horizon:** This new 2,000-kilometre fibre route from Geraldton to Port Hedland will close the final gap in our terrestrial network and will be the leading fibre backbone connection through Australia's main mining region. Project Horizon will also interconnect with two high-capacity submarine cables in Port Hedland – establishing Australia's north as a new hub for domestic and international data transit.
- **North-West Cable System extensions:** This project will extend our North-West Cable System north to Timor Leste and is investigating the opportunity to connect to Kupang in East Indonesia in response to a surge in capacity enquiries along Australia's East Coast.
- **East Coast Cable System:** This proposed submarine cable system between Melbourne, Sydney and Brisbane will complement our existing coastal and inland fibre routes. The East Coast Cable System is being designed as a 1,600-kilometre system with as many as 24 fibre pairs – the highest subsea fibre count system we will have deployed.

Vocus is headquartered in Melbourne, Australia. We operate across all states and territories of Australia.



Our supply chain

Vocus has a large and diverse global supply chain that we utilise to build and operate our network, support our business operations and serve our customers. We aim to develop strong supplier relationships that create long-term, sustainable value for our customers, shareholders, partners and stakeholders in the community.

Our supply chain is managed through a centralised procurement function. This team leads our supplier selection, onboarding processes and ongoing relationship management. In FY23, we established a dedicated role of Head of Sustainable Procurement and Procurement Operations, whose responsibilities include modern slavery risk management.

We engage with more than 1,300 active suppliers globally. Our top 25 suppliers account for over 70 per cent of our procurement spend, and are based in Australia, Singapore, France, and Philippines. During FY23, over 85% of our procurement spend (by value) was with suppliers located in Australia.

In FY23, our key categories of supplier spend included domestic and international carrier services (~45%); energy, including re-sale volumes (~16%); electronics, network and IT equipment (~15%); corporate and facility services (~12%); and network construction and operations (~12%).







Our direct suppliers often have extensive global manufacturing and supplier networks, and we recognise that modern slavery risks in our supply chain will extend beyond the suppliers with whom we directly contract. For example, we have identified that source countries for goods we procure include China, India and Brazil. The services we procure are largely provided from within Australia, India and the Philippines.

Our approach to addressing modern slavery

At Vocus, we do not tolerate any form of modern slavery practices in our operations or supply chain.

We respect human rights as set forth in the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

In FY22, we introduced Modern Slavery KPIs, and our first annual Modern Slavery Action Plan (Action Plan), with the aim of strengthening our approach to modern slavery governance and due diligence. In FY23, we implemented our second annual Action Plan to build on previous progress. Our performance against our KPIs and Action Plan commitments was overseen by the Board Audit and Risk Committee throughout the year. The commitments we made, and our progress against them are outlined in the table below, and throughout this statement.

| FY23 KPIs and Action Plan commitments | FY23 performance | Detail |
|---|--|---------|
| Implement a new supplier screening tool, in partnership with our industry peers, and use this tool to expand our modern slavery assessment to a larger group of suppliers |  | Page 14 |
| Increase the number of potentially high-risk suppliers that have undergone a modern slavery screening to 75% |  | Page 14 |
| Undertake at least two initial supplier site visits and audits |  | Page 16 |
| Increase the number of new suppliers ¹ that undergo a modern slavery screening to 75% |  | Page 16 |
| Ensure at least 40% of new supplier agreements contain modern slavery risk controls ² |  | Page 10 |
| Provide targeted modern slavery training to at least 200 Vocus employees, contractors and suppliers |  | Page 16 |

1. Our new supplier onboarding process implemented in January 2023 includes a modern slavery screening. Prior to that period, as modern slavery screening was performed manually, we only reviewed suppliers with an expected spend of more than \$20,000, due to resource constraints

2. This commitment relates to new or renegotiated contracts with values of \$20,000 or above and excludes instances where Vocus does not have the ability to negotiate terms, such as off-the-shelf software license agreements. While we did not meet this objective in FY23, 100% of new suppliers underwent a modern slavery screening during the period, providing confidence that they have the modern slavery governance and due diligence processes in place to meet our modern slavery requirements, as outlined in our supplier code of conduct.



Our policies and governance framework

We have established a comprehensive framework of Corporate Governance policies that apply to all Vocus directors, executives and employees. The policies of particular relevance to modern slavery are our Human Rights Policy, Code of Conduct, Supplier Code of Conduct, Procurement Policy, Grievance Policy and Whistleblower Policy, which have been established to maintain integrity and confidence in Vocus and appropriately safeguard the reasonable expectations of Vocus' key stakeholders. These policies outline the standards we expect of our people and our suppliers.

The Vocus Board of Directors is responsible for approving related Corporate Governance policies, as well as our annual Modern Slavery Act Statement. The Board Audit and Risk Committee has ultimate oversight of our modern slavery approach and performance, and modern slavery risks are assessed and managed in line with our enterprise-wide Risk Management Framework. Further information relating to our Risk Management Framework can be found in Vocus' ESG report, available on our website.

At an operational level, the Chief Operating Officer, Chief People Officer and General Counsel & Company Secretary have ownership of the day-to-day management of modern slavery governance, risks and due diligence. Responsibility for procurement of goods and services sits within the remit of the Chief Operating Officer.

All Vocus employees are responsible for knowing and following the policies and governance frameworks that apply to their jobs, living our core organisational values, and reporting any suspected breaches of law or our Code of Conduct.

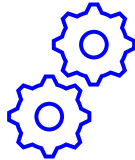
Our policies and governance framework cont.

In FY21, we worked together with our industry peers through the Telco Together Foundation (“TTF”) to develop an Industry Statement on human rights and modern slavery. The initiative is an important step forward in our efforts to work collectively to eliminate these practices across our value chain, share best practices and explore ways to support victims.

By signing this statement we have committed to upholding the following principles, which draw on standards for business conduct set out in the UN Guiding Principles on Business and Human Rights:



We acknowledge and respect human rights in our operations and supply chains and understand the importance of identifying and addressing human rights impacts.



We seek to cooperate across our value chain, in areas where we can add more value than working independently; to identify issues, share insights, and continually learn.



We understand the complexity of supply chains and, subject to law, will undertake to share insights, aiming to increase transparency, visibility and facilitate cooperative responses.



We acknowledge the risk of modern slavery and harm to people as a key driver for business action, to be considered along with other risks such as financial, market, operational or reputational risk.



We recognise the importance of working in partnership with our suppliers to mitigate risks, supporting them in their efforts to address modern slavery in their own supply chains.

Our policies and governance framework cont.

Since signing the Statement, we have remained active members of TTF's Modern Slavery Roundtables and have worked to embed the principles outlined above across our business.

We are committed to continuously improving and refining our modern slavery governance framework. In FY23 we reinforced our commitment to respect human rights through the introduction of a Human Rights Policy, which was approved in May 2023 by the Board People and Remuneration Committee.

Our Human Rights Policy includes a specific commitment to not tolerate modern slavery practices in any form in our operations or supply chain, such as child labour, forced, bonded or compulsory labour. Our Human Rights Policy also highlights that we expect our suppliers to demonstrate respect for human rights, by meeting the expectations set out in our Supplier Code of Conduct. The Policy encourages reporting of any human rights concerns. Reports can be made using internal reporting channels, as well as in accordance with our Whistleblower Policy.

Our Human Rights Policy is publicly available on Vocus' website, as well as via our internal communication platforms and company intranet.

Our Code of Conduct sets expectations for fair, ethical behaviour that is consistent with our values and in accordance with all laws and regulations relevant to our operations.

Vocus' Supplier Code of Conduct sets out our minimum standards and expectations for all suppliers with whom we do business. It outlines these expectations with reference to human rights and labour practices, as well as modern slavery, and specifically requires that our suppliers "ensure there is no child labour, or forced, bonded or compulsory labour within any part of their business operations or supply chain and that the organisation is in no way benefitting from or contributing to any type of modern slavery".

The Supplier Code of Conduct is published on Vocus' website. It also provides details on how suppliers can confidentially report concerns about improper conduct in accordance with Vocus' Whistleblower Policy.

Vocus' Procurement Policy sets out our expectations of our people with regard to considering, identifying and managing modern slavery risks. For example, during the procurement process, the responsible procurement lead must include a consideration of modern slavery risks in the selection process. The policy is published on our internal communications platforms.

Vocus' standard contract terms specifically address modern slavery and are available on our website. The contractual provisions in Vocus' standard Supplier Agreement include an undertaking that the supplier does not engage in modern slavery and requires the supplier to promptly notify Vocus of any incident or allegation that it or any entity in its supply chain has engaged in modern slavery. These standard contract clauses are publicly available on Vocus' website and communicated to suppliers during the onboarding process.

As many of our supplier contracts do not utilise our standard contract terms, we are working to ensure that we negotiate for modern slavery clauses to be added to contractual agreements with new suppliers, wherever possible. Of the 47 eligible supply agreements that Vocus entered into in FY23, only 36 per cent contained modern slavery risk controls, short of our target of 40 per cent. Throughout FY24 we will work to undertake the system and process improvements required to improve on our performance in future years. In the meantime, 100 per cent of potentially high-risk suppliers, as well as all new suppliers to Vocus were subject to a modern slavery screening and risk assessment throughout FY23, providing us with confidence that they have the modern slavery governance and due diligence processes in place to meet our performance expectations, as outlined in our supplier code of conduct.

Risk management and due diligence

We understand 'modern slavery risks' to mean the potential for our business to cause, contribute to, or be directly linked to modern slavery, in line with the UN Guiding Principles on Business and Human Rights. The nature and extent of modern slavery means there is some inherent risk of its presence in the telecommunications industry's operations and supply chains; for example, in the working conditions of some contracted labour or the manufacturing and distribution processes of some products.

Assessment of modern slavery risk

To better understand our potential modern slavery risks, we continue to enhance our processes for risk identification, analysis and assessment.

This year we refreshed our detailed risk analysis, through which we identified where modern slavery risks have the greatest potential to arise across our operations and supply chain, by reference to recognised modern slavery risk factors, including high-risk sectors and high-risk geographies.

Examples of modern slavery risk factors across our supply chain include:

Geographic risk

Some countries are at higher risk of modern slavery practices due to weak governance and rule of law, conflict, corruption, displacement, state failure to protect human rights, migration flows and socio-economic factors like poverty or widespread discrimination.

Sector or industry risks

Some sectors are recognised as high-risk globally and include electronics, ICT sector, cleaning and apparel and in Australia, the construction industry.

Product and service risks

Including labour intensive work, the use of base-skilled contractors, or reliance on migrant workers.

Our understanding of these risk factors and categories was informed by reference to multiple sources of information, including media reporting and resources made available by organisations that include The Global Slavery Index, the Freedom House List, KnowtheChain, Global Contact Network Australia, Australian Human Rights Commission, ILO 2022 List of Goods produced by Child or Forced Labor, Transparency International 2022 Corruption Perception Index, OECD Fragility Index, and Home Affairs' Addressing Modern Slavery in Government Supply Chain Toolkit.

This risk analysis process demonstrated that our key risk categories remained largely consistent with those identified in FY22, notably Network and IT equipment, business outsourced services, cleaning services and network construction and maintenance.

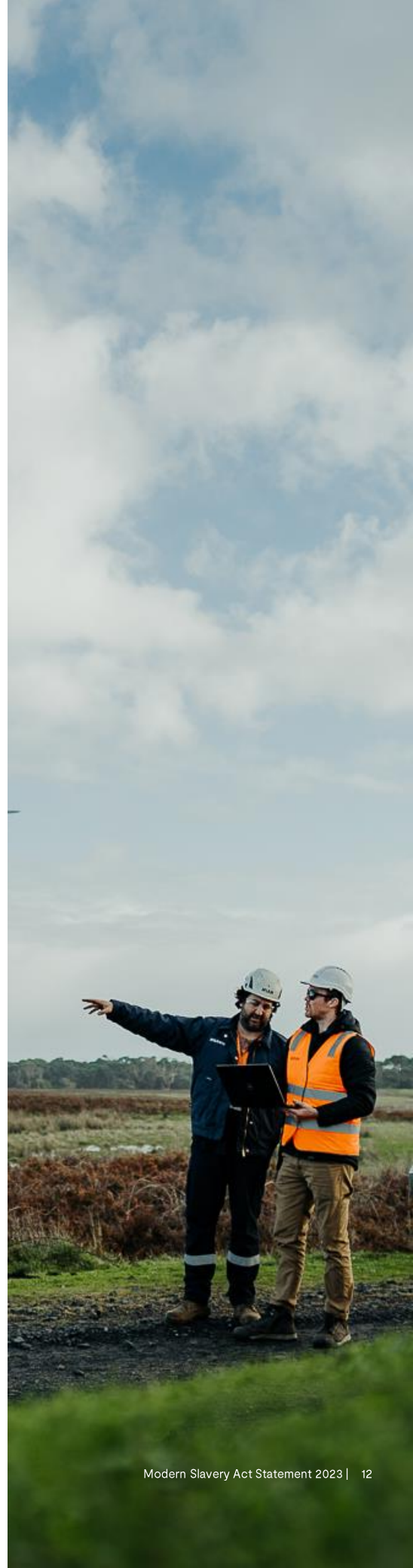
Potential modern slavery risks in our operations

Vocus could potentially be exposed to modern slavery risk as an employer. However, we consider the risk that our direct employee workforce could be subject to modern slavery to be negligible.

We have made this assessment on the basis that our direct employees are highly skilled, working within a mature regulatory environment and undertaking largely office-based roles. Our direct employees are based in Australia and are provided with contracts that comply with relevant Australian employment legislation and are supported by established, embedded employment-related policies and processes to ensure a safe and fair working environment. We are focused on creating an environment where our people are supported to grow and thrive.

The nature of our business and location of our operations means that our most material risk from an operational perspective exists with respect to the support provided to our operations by our contracted workforce in Manila, Philippines.

Further information on how we manage this risk is provided on page 17 of this statement.



Potential modern slavery risks in our supply chain

Vocus recognises that we may be directly linked to modern slavery through our procurement of goods and services. The nature and extent of modern slavery means there is some inherent risk of its presence in the telecommunications industry's supply chains.

We have assessed that our procurement of Network and IT equipment, products and services relating to the construction and maintenance of telecommunications networks, as well as cleaning services, represent potentially higher-risk categories for our business.

While our network construction and maintenance activity and procurement of cleaning services are based in Australia, which is considered relatively low risk in terms of modern slavery, we recognise that there is potential for workers in these sectors to be vulnerable to exploitation.

| Prioritised higher-risk categories | Primary region of origin | Goods and services provided | Potential modern slavery risk factors |
|--|--------------------------|---|--|
| Network and IT equipment | Asia, Europe | Equipment used to operate Vocus' networks and systems | Sector and industry risk Geographic risk |
| Construction and infrastructure maintenance | Australia | Network construction and infrastructure maintenance in Australia | Sector and industry risk Labour intensity Low skilled labour |
| Business outsourced services | Philippines | Inbound and outbound sales teams, customer service, technical support, provisioning and credit control. | Geographic risk |
| Cleaning services | Australia | Supply of cleaning services to offices and other Vocus premises | Sector and industry risk Labour intensity Low skilled labour |

Our risk analysis identified that modern slavery risks could also arise in other areas of our supply chain that may not be as material with respect to our spend, including: marketing merchandise, garments and personal protective equipment, catering services, waste management, physical security services, transport and solar panels. These potential risks arise as they may involve base-skilled workers who may be vulnerable to modern slavery or involve goods or services provided from, or manufactured in countries that present a higher geographic risk.

To help us to manage and mitigate potential modern slavery risks, we have implemented a range of programs and procedures to ensure the labour management standards we expect are being met.

Modern slavery risk assessment

In FY22, we conducted a modern slavery risk assessment across our top 100 suppliers. These suppliers were selected based on overall spend, as well as industry risk factors, such as the provision of network equipment, construction and cleaning services.

We increased the scope of our modern slavery risk assessment significantly in FY23, expanding our definition of “potentially high-risk supplier” to include:

- Any of our top 100 suppliers (by spend) who remained on our residual risk register following our FY22 assessment, on the basis that they did not respond to our initial questionnaire
- Any of our top 100 – 200 suppliers (by spend) who provided Vocus with products or services from potentially high-risk categories:
 - Goods: Network and IT Equipment, electronics, electrical equipment, components, electrical wire management devices, marketing merchandise, ICT products, garments/apparel, PPE, solar panels, lithium-ion batteries
 - Services: network construction and physical infrastructure maintenance services, cleaning, physical security services, waste management, transport and logistics, hospitality and food services.
- Any of our top 200 suppliers (by spend) who were identified in a third-party supply chain risk management platform as potentially representing a moderate or high level of modern slavery risk.
- Any suppliers, regardless of spend, who provided us with network construction and maintenance services and cleaning services, and
- Any of our top 198 suppliers (by risk category and spend) who were identified in a third-party supply chain risk management tool as being of moderate or high risk.

Suppliers screened via our third-party assessment tool

| Suppliers screened (by category) | Number of suppliers assessed | % of all Vocus spend |
|---|------------------------------|----------------------|
| Carrier | 28 | 47.9% |
| Cleaning | 12 | 0.3% |
| Construction & physical network maintenance | 28 | 4.2% |
| Corporate, consulting & professional services | 38 | 6.9% |
| Data centre | 7 | 3% |
| Electronics, electrical equipment, components & suppliers | 5 | 0.3% |
| Facilities, rental | 8 | 1.1% |
| ICT Products | 8 | 2.6% |
| Marketing | 9 | 1.5% |
| Network & IT equipment | 26 | 8.0% |
| Software | 24 | 2.4% |
| Transport & Logistics | 2 | 0.2% |
| Utilities | 3 | 0.3% |
| TOTAL | 198 | 78.9% |

Modern slavery risk assessment cont.

The 198 suppliers included in our third-party supply chain risk management tool screening process, represented 13 categories of goods and services and 79% of Vocus' overall procurement spend. This screening process added two additional suppliers to our overall list of 38 potentially high-risk suppliers that were included in our detailed risk assessment.

Detailed questionnaires were sent to each of these 38 suppliers, requiring them to provide significant detail and evidence of their modern slavery risk management, due diligence and governance processes.

We received responses to our questionnaire from 28 of these suppliers. Of these responses, 26 were deemed satisfactory. We are still in discussions with two suppliers who have engaged with the process, but are yet to provide sufficient evidence of their stated risk management controls, so our assessment remains ongoing. 10 suppliers did not respond to our questionnaire. We therefore took steps to find evidence of their modern slavery risk management and due diligence processes through other means, such as publicly available information and media reporting. We were ultimately satisfied with these suppliers had appropriate policies or procedures in place.

Suppliers subject to our detailed risk assessment

| Suppliers screened (by category) | Number of suppliers assessed |
|---|------------------------------|
| Did not respond to FY22 assessment questionnaire | 6 |
| Insufficient evidence provided in FY22 | 4 |
| Suppliers from high-risk categories not previously assessed: | 26 |
| <i>Cleaning</i> | 9 |
| <i>Construction & physical network maintenance</i> | 12 |
| <i>Electronics, electrical equipment, components & supplies</i> | 3 |
| <i>Food/coffee manufacturer</i> | 1 |
| <i>ICT products</i> | 1 |
| <i>Network & IT equipment</i> | 1 |
| TOTAL | 38 |

We did not identify any material concerns regarding the management of modern slavery risks through our review process.

Supply chain due diligence

We undertake due diligence in respect of the potential modern slavery risks we identify through our annual assessment, as part of our broader Vocus supplier risk and performance management process. This process includes a governance model that is tailored to the profile of each vendor in order to understand the criticality of the products and services they provide and their potential impacts in relation to modern slavery, as well as supply chain disruptions.

To further strengthen our due diligence approach, in January 2023 we introduced a new supplier onboarding process using a supplier management tool. The tool enabled us to automate some aspects of our supplier risk assessment process, including the identification of modern slavery and workplace health and safety risks. All suppliers that have been onboarded using this process have undergone a modern slavery screening based on their risk profile. We also undertook a manual screening of suppliers with an expected spend greater than \$20,000 who were onboarded through other channels during FY23.

To help us to extend the number of suppliers we include in our supplier screening and annual Modern Slavery Risk Assessment, we continued working together with TTF and our industry peers this year to implement a shared supplier screening platform. Due to factors outside our control, access to this platform was delayed, and implementation did not take place until late FY23. We therefore only used this tool to validate the initial findings of our manual FY23 risk assessment, and identify further suppliers to engage.

Further to the regular meetings we hold with our strategic suppliers, in FY23 we undertook two supplier site visits, both of which were selected using a risk-based approach. During these visits we interviewed the management of a battery manufacturer and a fibre optics cable manufacturer. Both organisations were found to have strong controls in place to manage their modern slavery risks.

Training

Training is key to ensuring our people are able to identify modern slavery risks and are equipped to respond to those risks. In FY23, we refreshed our modern slavery training, in consultation with an external business and human rights advisory firm, to align the content with current best practice. The training was undertaken by 169 employees including members of our Procurement, Operations, Legal, and People and Culture teams. The training is also available to all Vocus staff through our learning and development platform. The module is tailored to Vocus and includes information on what is modern slavery, why modern slavery is relevant to Vocus, Vocus' key modern slavery risks, modern slavery indicators and how to safely report potential instances of modern slavery within Vocus' operations or supply chain. We have set a target to extend the number of Vocus employees who have undertaken this training to 700 in FY24, and are also exploring opportunities to extend access to our suppliers to help them to build their awareness of our shared modern slavery risks.

Network construction and maintenance

We recognise the potential for workers in construction and maintenance industries to be vulnerable to exploitation as a result of factors such as high demand for low-skilled labour force, tight project deadlines, and poor visibility over long and complex supply chains.

We have a robust system for onboarding and establishing safety standards with our construction and maintenance contractors. All contractors, along with their workers and subcontractors, are required to comply with Australian National Employment Standards, as well as to complete online workplace, health and safety (WHS) induction and refresher training. We also audit our contractors monthly to monitor WHS standards and performance.

Contract workforce due diligence

We recognise there may be higher risks for workers who are not directly engaged by Vocus and based in the Philippines. A range of functions supporting our Consumer and Commander businesses, and some aspects of Vocus Network Services, are provided by a workforce in the Philippines that is employed by a third-party business process outsourcing partner (third-party partner). These functions include inbound and outbound sales teams, customer service, technical support, provisioning and credit control.

We maintain a close working relationship with our third-party partner in the Philippines. As the employer of our team there, they are responsible for developing and ensuring compliance with all relevant HR policies, in accordance with local laws. Our third-party partner is committed to action on modern slavery. They have a Modern Slavery and Responsible Procurement Policy and due diligence process in place to help manage potential risks across their operations and supply chain. Our Philippines workforce undertakes annual compliance training to ensure they are aware of their rights and responsibilities in the workplace, and specific modern slavery training is undertaken as part of the new-starter induction process. To support the wellbeing of our team in the Philippines and to help implement our company culture, values, strategy and sales practices across our contract workforce, we employ a Vocus Country Manager, who is based in Manila.



Ensuring our effectiveness

Our management of modern slavery risks is assessed and managed consistently within our enterprise risk framework. Regular management reporting, Board Audit and Risk Committee oversight of our progress against our Modern Slavery Action Plan and KPIs, as well as Board reporting on the status and effectiveness of our governance framework and related Corporate Governance policies, play a key role in helping us to ensure the effectiveness of our management approach.

To ensure our people are aware of their rights and responsibilities under our governance framework, we conduct mandatory compliance training. This training is rolled out to all new employees, as well as contractors directly employed by Vocus. These groups also undertake refresher training every two years. We track completion rates for our training.

To assist in ensuring the effectiveness of our risk management approach, we monitor supplier completion rates of our risk-assessment questionnaire and also hold quarterly meetings with our strategic suppliers. We use these meetings to ensure our suppliers' compliance with our expectations regarding modern slavery, and to discuss their risk management approach.

Collaboration with our suppliers and the broader industry is a key feature of our approach to combat modern slavery. We have the opportunity to assess the effectiveness of our risk management approach at an industry level, through our membership of the TTF Modern Slavery Roundtable. This forum provides our industry with the opportunity to regularly come together to share best practices and adopt collaborative approaches to managing our potential modern slavery risks.

Grievance mechanisms and remediation

At Vocus, we ensure our people and stakeholders have access to a range of channels, both formal and informal, for raising issues that concern them.

We are committed to providing, or cooperating in, appropriate remediation where we have caused or contributed to adverse human rights impacts. This commitment is set out publicly in our Human Rights Policy. If modern slavery practices were suspected, alleged, or identified in our supply chain, we would first work with our supplier to introduce clearly defined corrective actions, as well as process improvements and preventative measures to be implemented going forward.

In future, we hope to drive this engagement jointly with our industry peers through TTF wherever possible, so that we can leverage our collective influence to encourage supplier engagement. If a supplier is not open to engaging with us or committed to promptly implementing necessary corrective actions, business with the supplier will be terminated where possible.

Controls are in place to ensure the effectiveness of our grievance mechanisms. The Vocus Board, in consultation with the General Counsel & Company Secretary, undertakes regular reviews of the Whistleblower Policy to ensure it remains appropriate and is operating effectively.

Vocus' Chief People Officer undertakes regular reviews of our Grievance Policy and procedure and oversees the Your Say channel. Regular communications are also issued reminding employees of the availability of these feedback and grievance mechanisms.

Your Say

Your Say is an informal mechanism through which team members are encouraged to ask questions, make suggestions and raise concerns directly with Vocus' People and Culture team. All queries are addressed by a member of the People and Culture leadership team.

We undertake fortnightly employee engagement pulse-checks, which is also a mechanism through which team members can anonymously raise concerns. Vocus' General Counsel & Company Secretary and/or Chief People Officer may also occasionally receive ad hoc complaints or grievances directly. When this occurs, they thoroughly investigate any allegations objectively and fairly, and report back to interested parties in a timely manner on the outcome of the investigation.

Whistleblower Policy

Our Whistleblower Policy is accessible via the Vocus website and intranet, and sets out the various channels through which Eligible Whistleblowers can make a disclosure. Vocus employees, contractors, suppliers, and their families are all defined as Eligible Whistleblowers, as are the employees of Vocus third-party contractors or suppliers. Accordingly, genuine concerns about unethical conduct within the Vocus supply chain may be reported under the Whistleblower Policy, if other avenues are not successful.

Our Whistleblower Policy affords Eligible Whistleblowers anonymity, confidentiality and protection from detriment, in instances where they are reporting potential wrongdoing or inappropriate conduct. Once a disclosure is received by the appropriate Disclosure Officer, Vocus will investigate whether the disclosure qualifies for protection under the Policy, and whether a formal, in-depth investigation is required.

Along with making our Whistleblower Policy available to all new Vocus suppliers as part of our onboarding process, we have processes in place to check whether our suppliers and sub-contractors operate their own whistleblowing processes; how their processes are actively promoted within their organisations; and how any breaches or suspected breaches are reported.

To support eligible whistleblowers to make a disclosure, we introduced an anonymous third-party whistleblower hotline in early FY24. The hotline is available, free of charge, to all Vocus employees, contractors, suppliers and their families.

Vocus' Whistleblower Policy is publicly available at the following link: <https://www.vocus.com.au/about-vocus/social-impact/governance>

Grievance Policy

Our Grievance Policy provides our people, as well as Vocus customers and visitors to our sites, with a formal mechanism to help address and resolve grievances in a way that is fair, reasonable and timely. The Policy is available via our intranet and sets out a procedure by which concerns can be raised, investigated and resolved.

During FY23 no Whistleblower reports or grievances were raised via any of these channels in respect of modern slavery issues.

Looking forward

At Vocus, our approach to addressing modern slavery will continue to evolve, focusing on continuous improvement. In the coming year, our focus will be on delivering against our FY24 Modern Slavery Action Plan Commitments:



Extend our modern slavery risk assessment to a larger group of suppliers



Undertake a modern slavery screening of all new suppliers



Provide targeted modern slavery training to at least 700 Vocus team-members



Ensure at least 75% of new supplier agreements contain modern slavery risk controls.*



Undertake at least four supplier site visits/audits

*This commitment relates to new or renegotiated contracts with values of \$50,000 or above and excludes instances where Vocus does not have the ability to negotiate terms, such as off-the-shelf software license agreements.

Approval

This Modern Slavery Act Statement was approved by the Board of Directors on 18 October 2023 and is signed on its behalf by the Chief Executive Officer and Chair of the Board.



Ms Ellie Sweeney
Chief Executive Officer



Ms Penny Bingham-Hall
Chair of the Board

Appendix

How our Statement addresses the mandatory reporting criteria

Modern Slavery Act requirement

Reference in this statement

Identify the reporting entity

About this statement, page 2

Describe the reporting entity's structure, operations and supply chains

Our structure, operations and supply chain, pages 4-6

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls

Risk management and due diligence, pages 11-17

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Our approach to addressing modern slavery, page 7
Our policies and governance framework, page 8
Risk management and due diligence, pages 11-17
Grievance mechanisms and remediation, pages 19-20

Describe how the reporting entity assesses the effectiveness of these actions

Ensuring our effectiveness, page 18

Describe the process of consultation with any entities the reporting entity owns or controls

About this statement, page 2

Provide any other relevant information

Looking forward, page 21