

BSA LIMITED ABN 50 088 412 748

Modern Slavery Statement – FY24

[Explanatory note: The following are the 7 mandatory criteria on which BSA must report. They are annotated alongside sections below.

1. *identify the reporting entity*
2. *describe the reporting entity's structure, operations and supply chains*
3. *describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls*
4. *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*
5. *describe how the reporting entity assesses the effectiveness of these actions*
6. *describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and*
7. *provide any other relevant information.]*

SUBSTANTIVELY

(1) This fifth Modern Slavery Statement ("5MSS" or "Statement") is filed by BSA Limited ACN 088 412 748 ("BSA") for itself and its Subsidiaries (defined below) in compliance with its obligations under the Modern Slavery Act 2018 (Cwlth) ("the Act") and covers the period ending 30 June 2024 ("FY24"). It describes developments since the filing of BSA's fourth Modern Slavery Statement ("4MSS") filed with the Attorney-General's Department on 21 December 2023.

This Statement was approved under section 14(2)(d)(ii) of the Act by the board of BSA Limited on 19 December 2024 and the Joint Chief Executive Officers ("Jt CEOs"), Arno Becker and Richard Bartley, were authorised to sign it and submit it to the Attorney-General's Department ("AGD") for registration on the Modern Slavery Statements Register ("the Register").

OUR STRUCTURE AND OPERATIONS

(2) BSA remains a technical services contracting company listed on the Australian Securities Exchange ("ASX") with the ticker code "BSA". As at 30 June 2024, it was the ultimate holding company of the group of wholly-owned and controlled companies shown in Annexure 1 and listed in Annexure 2 ("the Subsidiaries").

(6) The directors of each Subsidiary are as set out in Annexure 2, and it will be noted that each Subsidiary includes a JT CEO as one of its directors. The Secretary of each Subsidiary, Arno Becker, is also the Secretary of BSA.

The Jt CEOs attend all Board meetings of BSA Limited and consultation between the directors of BSA Limited and the Jt CEOs (on behalf of the Subsidiaries) can thus occur at those Board meetings. This Statement has been considered by the Boards of each Subsidiary who were consulted as to its contents. The Boards of all Subsidiaries approved the Statement on 13 December 2024. The Jt CEOs are charged with

ensuring that instructions by the Board of BSA are implemented by BSA's management within the operations of the Subsidiaries as part of the operational structure outlined below. As at 30 June 2024, BSA engaged 272 employees split between its "Continuing Operations" (204) and "Discontinued Operations" (16) (described below), and Corporate function (52).

(2) BSA's operations have slimmed down and now consist only of "Continuing Operations" (previously "Communications and Utility Infrastructure" ("CUI")): providing - on a national basis - strategic advice, design, implementation, operations and maintenance services, specialising in telecommunications networks and technologies. Continuing Operations provides services to the telecommunications, subscription television and utility industries. These services include the delivery of bundled services over fixed line multi-technology networks, the installation of subscription television and the installation of smart meters. Continuing Operations plans to develop its installation of electric vehicle charging stations in future years.

(During FY24, BSA recognised that its "Discontinued Operations" (otherwise "Advanced Property Solutions Fire Build - a NSW-based, fire detection and suppression business previously classified by BSA as 'an asset held for sale') would not be sold within a reasonable period and so the decision was made to close it down altogether. Staff were retained to effect that closure in an orderly fashion and the majority have now (as at 3 December 2024) been made redundant. It is anticipated that the closure will have been completed by 30 June 2025.)

(3) THE RISK OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

In its assessment of modern slavery risks as of 30 June 2024, BSA has tried to retain its consistent approach to assessing and managing risk across its business.

During FY24, BSA continue to assess and mitigate its modern slavery risk. It believes that - as a result - the risk has lessened a little. While BSA's risk management has matured during the period, BSA accepts that constant improvement is required.

BSA continues with a relatively flat management structure. Therefore, we have optimised the use of available resources by working with other stakeholders (including subcontractors and suppliers) to maximise positive change.

BSA remains a contracting business supplying services to its customers and incorporating goods and services from other suppliers, both locally and internationally. BSA has enjoyed a long relationship with many of these but understands that there is still a risk that - despite our mitigating activities (see below) - our operations may be supported by supply chains which include labour provided by those who have been coerced, exploited or otherwise deprived of their basic freedoms.

BSA remains an Australian business with operations confined to Australia. Many of our immediate suppliers are based in Australia or have registered Australian subsidiary businesses. The logic of using Australian-based suppliers was described in earlier Modern Slavery Statements filed by BSA and remains: BSA leverages Australia trading

and employment laws to ensure modern slavery practices are minimised in our immediate supply chains.

Our immediate suppliers can still be defined by 3 categories:

- i) Direct Goods: Direct Suppliers of products that are used to complete BSA's contracted work. BSA still receives "free-issue" goods from some customers which it subsequently uses to provide the services. BSA has no control over how those goods are procured, or any other element of that supply chain. Accordingly, we have excluded those free-issue goods from our analysis. In support of that decision, we recognise that those customers providing free-issue goods:
 - i. have large revenues; and
 - ii. will probably themselves have already discharged their own modern slavery obligations.

Consequently, we continue to consider the risk of modern slavery with regard to free-issue goods as low.

- ii) Indirect Goods and Services: Indirect suppliers of products and services that support BSA's contracted work indirectly. These include telecommunication providers, IT and office equipment, safety training services etc. and those who assist in the management and support of BSA offices and facilities.
- iii) Direct Labour Hire: Subcontractors who provide services to fulfil BSA's contractual obligations for contracted work. These include sole traders, third party labour hire companies, and Australian businesses employing a skilled workforce with relevant industry expertise.

We expand on these three categories as follows:

Direct Goods:

These include cables, tools, electrical consumables, safety equipment etc. and are procured directly from suppliers by BSA to complete contracted work. They may be manufactured in Australia and obtained directly from these manufacturers or may be procured indirectly from other manufacturers through our immediate suppliers. BSA recognises that there is increased risk of human rights abuses where BSA does not have a clear line of sight over who is manufacturing the end product. (For example: BSA has identified that a significant portion of its consumables are manufactured in South East Asia and present a risk of modern slavery.)

Indirect Goods and Services:

BSA still procures some indirect goods and services, largely through large, well-governed and publicly-listed companies which are (because of their turnovers) themselves subject to anti-modern slavery legislation, declarations and practices. Examples include those who provide BSA with telecommunication services, IT and office equipment, safety training services etc. BSA has reviewed several of their anti-slavery statements and those reviewed indicate compliance with the law.

Additionally, they appear well-equipped to mitigate those risks in their own business practices and supply chains.

Direct Labour Hire:

Although BSA has a large sub-contract labour force, we do not believe that the suppliers we contract with directly ("Primes") present a significant risk of "modern slavery". In FY 24 we continued to:

- 1 roll out Modern Slavery Training for onboarding sub-contractors to complete; and
- 2 further educate our nbn sub-contractors (who received a request to read and acknowledge a "Statement of Expectations" to ensure subcontractors at every level are treated fairly, respectively and are compensated for the work performed in line with market rates).

In FY 24, of our total subcontractor workforce, over 80% were sole traders. The remainder engaged between 2-30 workers within their organisation. During the second half of FY25, BSA will seek to audit those that are deemed as higher risk.

(4) OUR ASSESSMENT OF THE RISKS

As at 30 June 2024, BSA's financial records (in its Pronto database) indicate that during FY24, there has been a reduction of about 45% in the number of suppliers and subcontractors to around 1550. In part, this is a result of the disposals of the APS Maintain and APS Fire Qld businesses in FY23. 32% of those suppliers or subcontractors previously considered "active" by BSA (i.e. they traded using an ABN) were supplying exclusively to those APS businesses sold. As a result of the two disposals those suppliers have been offboarded.

The suppliers as of 30 June 2024 have been re-analysed and, again, prioritised by spend characteristics. Graphs 1, 2 and 3 show the distribution of the spend per supplier against the number of all such suppliers for that type of supply i.e. (i) Direct Goods, (ii) Indirect Goods & Services or (iii) Direct Labour Hire.

(Please note that in the following Tables and Graphs:

"MSS" refers to a Modern Slavery Statement filed by BSA;

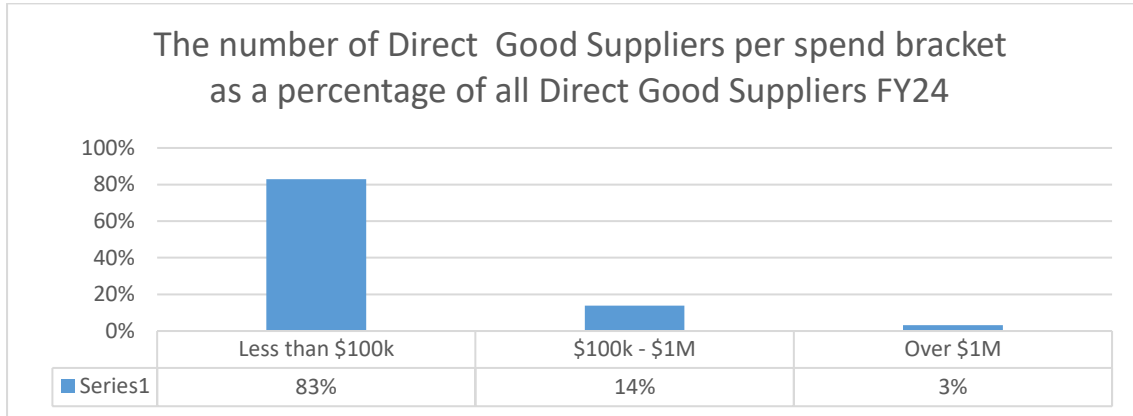
"LH" means "Labour Hire"; and

"SC" means "Subcontract" or "Subcontractor" as the sense requires.)

(i) Supply: Direct Goods

In considering suppliers of Direct Goods (Graph 1, below), there remain many suppliers supplying goods worth less than \$100,000 per year. The percentage has decreased slightly from 86% (4MSS) to 83% in FY24, continuing a downward trend.

Graph 1: FY24: Direct Goods



That downward trend is reflected in the reduction in the total of all such suppliers shown by the following table, Table 1. The reduction is driven by the disposals of the two corporate entities in FY23 and we anticipate a further reduction (to sub-50 suppliers) driven by the demise of Discontinued Operations (at the end of FY25) and as we continue to consolidate.

Table 1:

FY	Category	MSS	# of Suppliers	Supplier reduction change FY 23-24
FY21	Direct Good Supplier	2MSS	837	
FY22	Direct Good Supplier	3MSS	686	
FY23	Direct Good Supplier	4MSS	559	
FY24	Direct Good Supplier	5MSS	94	-83%

(ii) Supply: Indirect Goods and Services

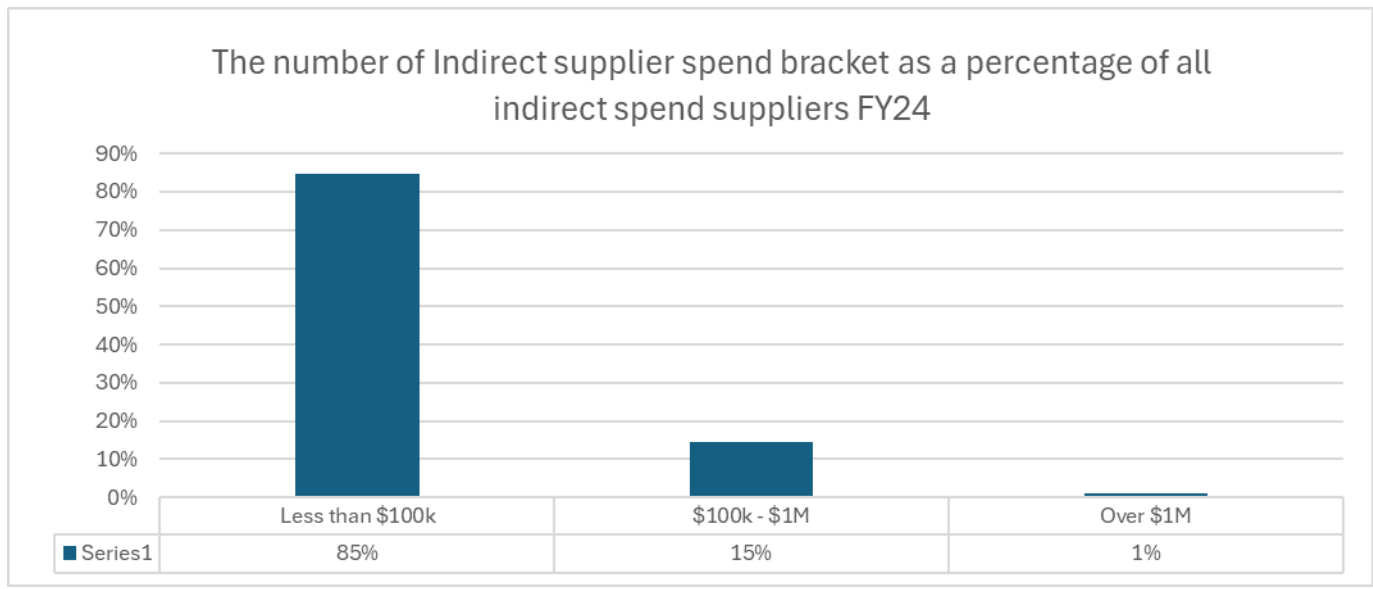
BSA's suppliers providing indirect goods and services have reduced in number (see Table 2 below) during FY24 and when their sales volumes are considered (see Graph 2), it can be seen they tend to be larger suppliers, assumed to be subject to their own "modern slavery" reporting regime.

Table 2

FY	Category	MSS	# of Suppliers	Supplier reduction change FY 23-24
FY21	Indirect	2MSS	414	
FY22	Indirect	3MSS	338	
FY23	Indirect	4MSS	275	
FY24	Indirect	5MSS	174	-37%

BSA further assumes that their own work in assessing and mitigating the modern slavery risk likely results in a lower risk to BSA since these suppliers are unlikely to tolerate modern slavery in their own supply chains. Consequently, BSA has not focussed on these. BSA intends to re-assess those suppliers when renewing or re-tendering their supply contracts, and consolidate them where practical.

Graph 2: FY24: Indirect Supplier of Goods & Services



(iii) Supply: Direct Labour Hire

BSA's Direct Labour Hire suppliers have reduced markedly during FY24 (see Table 3 below).

Table 3

FY	Category	MSS	# of Suppliers	Supplier reduction change FY 23-24
FY21	Direct LH and SC	2MSS	2243	
FY22	Direct LH and SC	3MSS	2114	
FY23	Direct LH and SC	4MSS	1957	
FY24	Direct LH and SC	5MSS	1120	-43%

The revenue received by these during FY24 has been considered and itemised (see Graph 3 below). BSA has interpreted Table 3 and Graph 3 as indicating that a bigger proportion of spend is attributed to fewer suppliers which could be a desired consequence of BSA's efforts to consolidate its supply chain generally. Those suppliers receiving less than \$100,000 p.a. are still likely to be unincorporated sole traders or

those traders who have incorporated, but remain very small labour providers.

Graph 3: FY24: Direct Labour Hire



The decline in the number of these very small labour providers in recent years is shown in Table 4 below.

Table 4: (Direct Labour Hire: the proportion of supplier spend bracket compared)

	Less than \$100k	\$100k - \$1M	Over \$1M
3MSS	65%	33%	2%
4MSS	65%	34%	2%
5MSS	54%	44%	2%

It can thus be seen that in FY24 there has been a slight shift towards the use of slightly larger labour hire providers (receiving revenue of between \$100k and \$1M p.a.). (For convenience, we refer to these as "medium-sized companies".) That might suggest an increased risk of modern slavery in BSA's supply chain which should be investigated.

We recognise that during FY23, BSA was winding up a number of projects in its Fire Business (now discontinued) which utilised (in each project) a number of subcontractors (each with a small workforce). Since each project tended to engage its subcontractors on a project basis, and also because those staff cannot be trained or re-assessed by BSA going forward, we have excluded those subcontractors (80 in all) from further consideration in this section.

That leaves a balance of 1032 suppliers with an ABN. Of which, 48 are established recruitment agents and external Labour Hire providers, and 174 had been offboarded during the year, resulting in 810 Subcontractors current with BSA. The conclusion that there might be an increased risk of modern slavery is supported by an analysis of the remaining 810 suppliers as at 30 June 2024. That analysis is summarised in Table 5 below.

Table 5

Subcontractor Base	% Split
Total Number of companies > 1	19%
Individuals	81%
<u>Subcontractor Companies with more than 1 "Worker"</u>	
Contractors 2 -5	84%
Contractors 6 -9	12%
Workers 10 - 29	4%

For transparency and compliance reasons, it is BSA's policy that every subcontractor engaged by it should be a "Pty Ltd" company. Of the 810 companies supplying direct labour as a subcontractor, 81% are "Man in a Van" individuals who are self-employed Labour Hire suppliers who choose not to employ others.

However that leaves 19% of the 810 (or 156 subcontractors), which have 2 or more staff and the risk these do not pay their staff the statutorily required wage has previously been assessed as low. When those 156 are themselves analysed, we can see (Table 5, bottom half) that the numbers are skewed towards smaller workforces. Historically we considered the larger of these as presenting the greatest risk.

On reflection, and after conducting some assessments in the field, we have discovered that some contractors employing 2 – 5 workers or 6 – 9 workers are family companies. In these, the workforces tend to consist of workers who are related to each other. While one would hope that family ties would encourage good treatment of family employees by their managers, we cannot ignore the risk that those family ties are used as an excuse not to pay any wages at all, or to pay less than the statutory minimum, or to otherwise exploit employees. Such treatment would, of course, amount to a form of slavery.

Having recognised this risk, we have resolved to conduct further investigations into this workforce during the balance of FY25. Those investigations will commence with BSA auditing these subcontractors, requiring completion of a fresh Modern Slavery Questionnaire. The completed questionnaire will give BSA greater insight into the understanding of each such subcontractor as to the risk of modern slavery generally and particularly its presence in their own supply chain downstream. That insight will guide BSA's future further investigation and downward selection of non-compliant subcontractors.

It will be recalled that BSA aspires to consolidate its supply chain. Successful implementation of that strategy should allow BSA to concentrate its future analysis on working with larger suppliers and that concentration of effort is likely to be more productive in eliminating modern slavery from BSA's supply chain.

In conclusion, BSA remains of the opinion that it should concentrate its attention on:

- 1 Direct Goods suppliers receiving more than \$100k in revenue from BSA; and
- 2 Direct Labour Hire suppliers receiving more than \$100k (noting particularly the caveat above about “medium-sized” and family companies)

because

- 1 Direct Labour: Labour hire and subcontracting may include unfair conditions for workers. Migrant workers and sole traders are often at risk of exploitation. BSA has sought (and will seek) assurances from its labour providers as to their processes for the protection of their workers; and
- 2 Direct Goods: these suppliers remain subject to considerable pricing and margin pressures. Consequently, they may source goods from overseas manufacturers in low labour cost jurisdictions. BSA expects these jurisdictions are those most likely to encourage indentured or child labour.

Of the two types of suppliers, BSA continues to assess the risk of modern slavery among its direct labour suppliers as being lower. Labour subcontractors are relatively numerous, form an essential part of BSA's operating model and are predominantly self-employed and described as “a Man in a Van”. BSA retains its experienced and proficient “compliance team”, who assess most of such would-be subcontractors before they are “on-boarded”, including for their modern slavery compliance.

Many subcontractors have provided services to BSA for many years. Those subcontractors retain autonomy in the running of their businesses, but BSA is very familiar with their business models, service delivery and personnel. BSA's strong safety focus requires a relatively large H&S team who constantly conduct safety audits at work sites. Those audits require regular interaction with subcontract staff, and that interaction facilitates early identification by BSA of any likely improper engagement of subcontract workers.

The position regarding BSA's Direct Goods suppliers is different. Many of the smaller suppliers retain commercially confidential supply chains, so as to protect

- (i) them against disintermediation, and
- (ii) their margins in the face of stiff competition.

That opacity makes it difficult for BSA to assess the risk of modern slavery in these supplier's supply chains. Steps taken by BSA to mitigate this risk are described in the next section.

(4) WHAT MITIGATIONS HAVE WE TAKEN?

BSA retains its multi-channel approach to tackling the risk of modern slavery in its supply chain:

- 1 BSA's People team has instigated a regime of ‘refresher training’ for BSA's employees every 2 years, during their continued employment. Employees who thus undertook initial training in September 2022 have been required to undertake “booster” refresher training since 1 September 2024. 100% Compliance has been achieved.

- 2 The same on-line Modern Slavery training is mandatory as part of their induction for all new employees who onboard as recruits, and compliance with this requirement is monitored and tracked by the recruiting business. Continuing Operations' subcontract technicians delivering telecoms services are expected to undertake the same on-line training. (Those Discontinued Operations staff who remain in the field will be required to undertake training at early-morning 'toolbox' training sessions. All others who remain will take the on-line training.)
- 3 All subcontractors are engaged under written contracts including specific contractual promises by the subcontractor to comply with the law as to modern slavery and to take steps to eliminate it.
- 4 The Continuing Operations engages some labour using labour hire companies. No such labour hire company is considered compliant or onboarded to supply BSA with labour unless - as part of the compliance process - its management have completed the online Modern Slavery Training.
- 5 BSA's full-time Procurement professional supervises the assessment of "modern slavery risk", as part of BSA 's "due diligence" approach before the engagement of all new suppliers and has redoubled the Group's concentration on continuing suppliers, including as follows:
 - a. In November 2023, BSA circulated to its then 1363 subcontractors and their field resources (working on BSA's nbn platform) the nbn code of conduct and required that these read and acknowledge receipt of this statement of modern slavery requirements: 100% complied and any future onboarding subcontractors are required to complete to become compliant in our workforce.
 - b. In June 2024 the BSA code of conduct was updated and resent to employees and external workforce to reiterate the expectations of ethical behaviour within our business.
 - c. BSA management's participation in external forums examining the Modern Slavery Act and best practices within various industries.
 - d. Working with our customers to ensure alignment across our ESG strategy, of which Modern Slavery forms part.
 - e. BSA has updated its Modern Slavery Online Training to ensure all content is up to date and includes references to Human Rights as the focus on Modern Slavery now broadens.
 - f. BSA has established a BSA Modern Slavery Governance Forum with its Senior Leadership Team. This is scheduled to meet twice a year to share updates on our internal supplier base and updates on the Modern Slavery Act, with this information to be disseminated through the Leaders'teams.

(5) ARE THEY EFFECTIVE?

Given earlier feedback, BSA remains convinced that the training is effective and of real value in raising the workforce's awareness of the prevalence of modern slavery, and the risks it presents to companies like BSA.

As at the date of this 5MSS, BSA still has not received – whether through its management chain or through its 'whistleblower hotline' - any substantiated complaint (raised by an employee of BSA or the staff of a supplier or subcontractor) raising concerns about their employer and the complainant's working conditions.

BSA continues the yearly self-assessment of BSA's Sustainability rating by the external Ecovadis organisation and was assessed as "Bronze" in January 2024.

The Ecovadis "Labour and Human Rights" section in the assessment remained "Strong" against the criteria. The Ecovadis assessment will be repeated in January 2025. BSA will utilise any suggested areas of improvement to support our own initiatives.

BSA understands the need to be ever vigilant to the Modern Slavery risks and continues to survey all suppliers considered to present an unacceptable level of risk.

(7) WHAT WILL WE DO NEXT?

BSA will continue to implement its strategy to improve the BSA supply chain, including by:

- a. Assessing all new suppliers before on-boarding them; and
- b. Re-assessing existing suppliers regularly on a desk-top basis; and
- c. encouraging subcontractors to participate in HSE Steerco forums with our Executive and Senior Leadership Teams; and
- d. encouraging subcontractors to participate in BSA's Health and Safety Index Surveys (noting that typically 42% of subcontract workers – through our yearly surveys - contribute commentary as to the success (or otherwise) of field initiatives); and
- e. Auditing in a focussed way those assessed as unsatisfactory; and
- f. Reducing BSA's reliance on larger numbers of smaller suppliers.

The closing of the Discontinued Operations' Fire business means it (and its many suppliers) will no longer form part of the BSA environment. This allows BSA to move to a simplified and stream-lined supply chain. That will enable the business that remains to concentrate more on the residual suppliers.

BSA prides itself on its Health & Safety performance across its operations. It is hoped that the day-to-day vigilant monitoring of working conditions and the welfare of BSA workers on site by BSA's supervisors and work, health and safety team will be maintained, thus mitigating the modern slavery risk for workers delivering customer-facing services.

Dated: 19 December 2024



Arno Becker

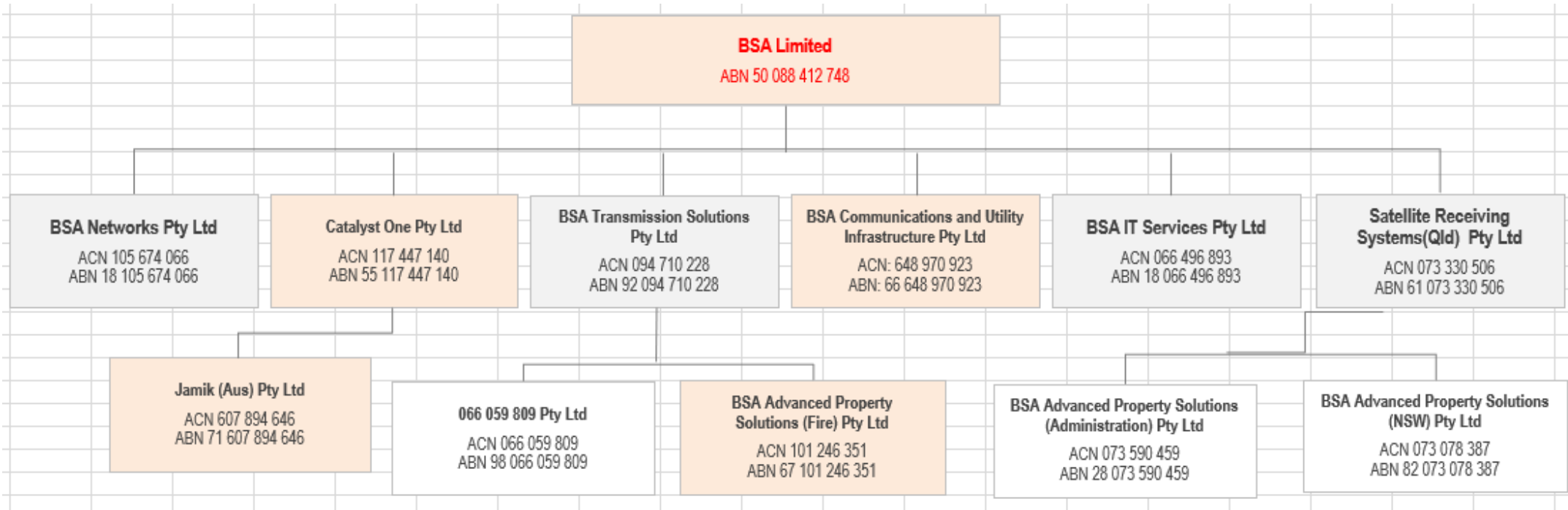
**Joint Chief Executive Officer
for BSA Limited**



Richard Bartley

**Joint Chief Executive Officer
for BSA Limited**

ANNEXURE 1



ANNEXURE 2: BSA subsidiaries and directors

BSA Subsidiary	ACN	Directors
Catalyst One Pty Ltd	117 447 140	Richard Bartley, Franc Vaccher
Jamik (Aus) Pty Ltd	607 894 646	Richard Bartley
BSA Transmission Solutions Pty Ltd	094 710 228	Arno Becker
066 059 809 Pty Ltd	066 059 809	Arno Becker
BSA IT Services Pty Limited	066 496 893	Arno Becker
BSA Advanced Property Solutions (NSW) Pty Ltd	073 078 387	Arno Becker
Satellite Receiving Systems (Qld) Pty Ltd	073 330 506	Arno Becker
BSA Networks Pty Ltd	105 674 066	Arno Becker
BSA Communications and Utility Infrastructure Pty Ltd	648 970 923	Arno Becker, Peter Schmiedel
BSA Advanced Property Solutions (Administration) Pty Ltd	073 590 459	Arno Becker
BSA Advanced Property Solutions (Fire) Pty Ltd	101 246 351	Arno Becker