AARNet 2025 Modern Slavery Statement

AARNet Pty Ltd, AARNet Research Cloud Pty Ltd, AARNet Services Pty Ltd and Vantage Fibre Projects Pty Ltd

V1.0 LAST UPDATED MAY 2026 | **PUBLIC**

Acknowledgement of Country

AARNet acknowledges the Traditional Custodians of the lands we work upon and connect across, recognising the profound connection to lands, waters and communities where we operate.

We honour the enduring cultural legacy and continuous thread of storytelling and communication of the world's most ancient living cultures.

We extend our respect to the Elders, those who have passed, those who are with us today, and those who will guide us into the future.

Message from the Chair and CEO

AARNet is pleased to present our third Modern Slavery Statement, covering the 2025 calendar year.

Modern slavery encompasses various forms of severe labour exploitation, such as forced labour, debt bondage and human trafficking and remains a pervasive challenge in today's global economy. In 2021, the Global Slavery Index estimated that 50 million people are living in modern slavery worldwide, an increase of 10 million compared to 2016. Industry has a crucial role to play in resolving this issue.

The Global Slavery Index estimates that $468 billion of goods imported by G20 nations are at risk of modern slavery practices. Supply chains are increasingly global in nature and a key contributor to modern slavery practices.

AARNet recognises that modern slavery can occur within any supply chain or business operation, making vigilance and proactive measures essential components of corporate responsibility and governance.

This report includes an analysis of our supply chain and investment portfolio, reaffirms AARNet's modern slavery risks, provides an update on progress made to mitigate the risks within AARNet's operations and supply chain and identifies future actions.

This statement was approved by resolution of the Board of Directors on 4th June 2026.

Ian O'Connor

Professor Emeritus Ian O'Connor AC
Chair, AARNet Board

Benjamin White

Ben White
CEO, AARNet

About AARNet

AARNet's commitment to being a force for good within the communities we operate is reflected in our values and strategic plan.

This statement covers AARNet Pty Ltd (ABN 54 084 540 518) and its 100% owned entities, AARNet Research Cloud Pty Ltd (ABN 58 666 840 286), AARNet Services Pty Ltd (ABN 93 666 866 806) and Vantage Fibre Projects Pty Ltd (ABN 85 684 387 059).

Structure and operations

AARNet is a proprietary company in which 37 Australian universities and the Commonwealth Scientific and Industrial Research Organisation (CSIRO) have an equal shareholding. AARNet is also a not-for-profit company registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC). Charities exist to pursue a charitable purpose. AARNet's purpose can be summarised as advancing education and research through supporting the education and research activities of its shareholders ("Members"), and others, by providing telecommunications and associated services.

AARNet's principal activity is the provision of internet and advanced telecommunication and network services to its shareholders and other customers.

This includes the use of AARNet's internet and other telecommunications facilities and services to provide educational programs and conduct research activities and to collaborate with other parties (nationally and internationally) in furtherance of research and education objectives.

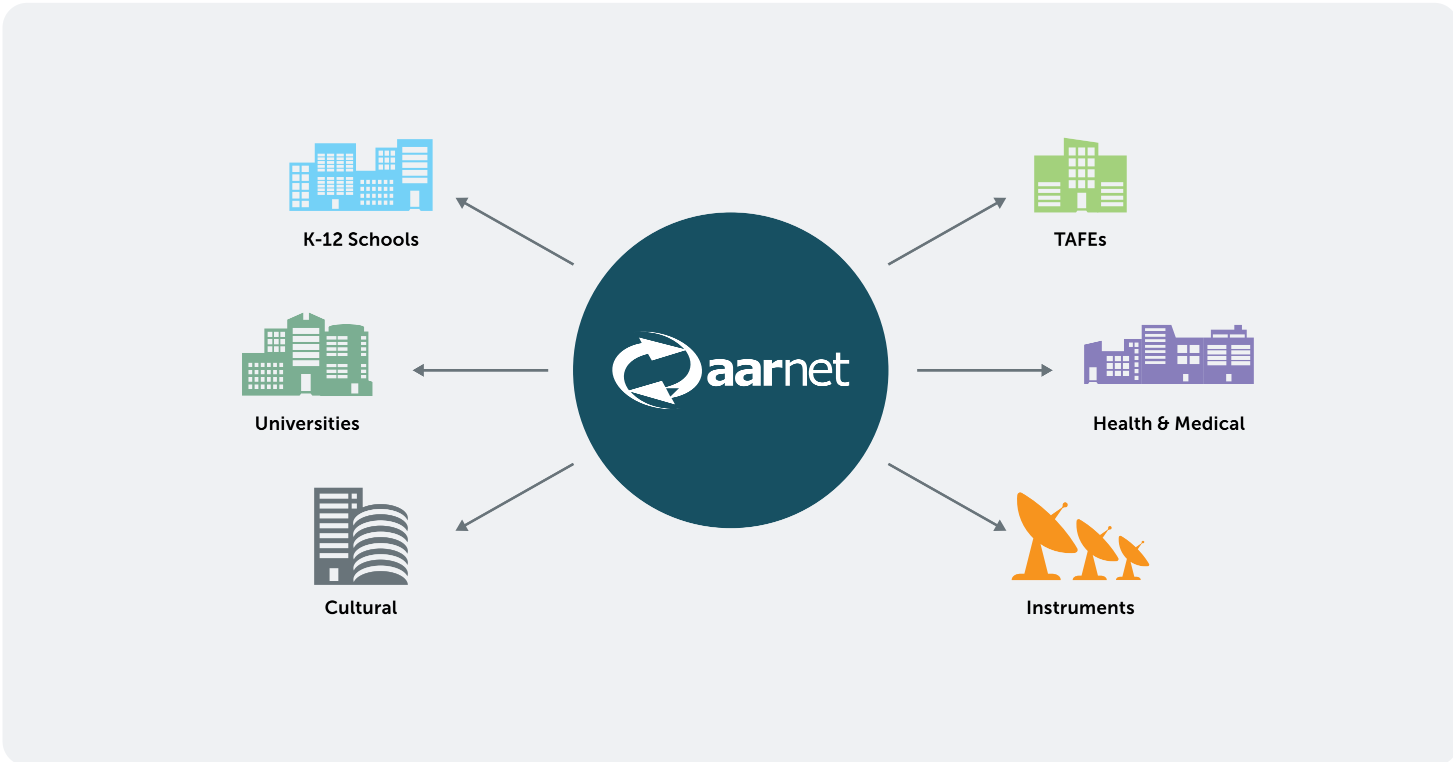
In addition, AARNet:

» Facilitates the construction of optical fibre infrastructure to extend the AARNet backbone and to connect campuses and other locations to facilitate services for Members and customers,

» Provides applications and services which operate across the AARNet network supporting education and research activities,

» Secures those applications and services operating across the AARNet network through a Security Operations Centre and additional cyber security-related applications and services, noting the decision was made in late 2025 to close the Security Operations Centre by the end of 2026.

» Participates in the design and deployment of advanced network infrastructure in partnership with network organisations in Australia and internationally.



Our principles

Our Vision:

A high bandwidth, globally connected research and education network that connects Australian educators and researchers to those with whom they wish to collaborate anywhere in the world, with ease, speed and convenience that makes the issue of physical separation irrelevant. Unashamedly, we care about enabling outcomes that benefit future generations of Australians.

Our Mission:

To provide trusted and transformational connectivity and collaboration services to meet the unique needs of research and education.

Our Values:

Trust

Communication is open and transparent. We are honest and ethical and always respect and support each other.

One Team

Everyone counts and is accountable. We are committed to teamwork and partnerships – collaboration is at our heart.

Creativity

Strive to innovate – it's in our DNA. We embrace creative solutions to problems, seek out diverse perspectives and enjoy what we do.

Our Strategic Plan

Our Strategic Plan (2023–2027) outlines our priorities: Community, Network, People, Sustainability, Products and Services, and Security.

FIGURE 1: AARNET'S 2023 – 2027 STRATEGIC PLAN

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Governance framework

Figure 2 below shows the governance structures outlined above that guide the decision-making process at AARNet.

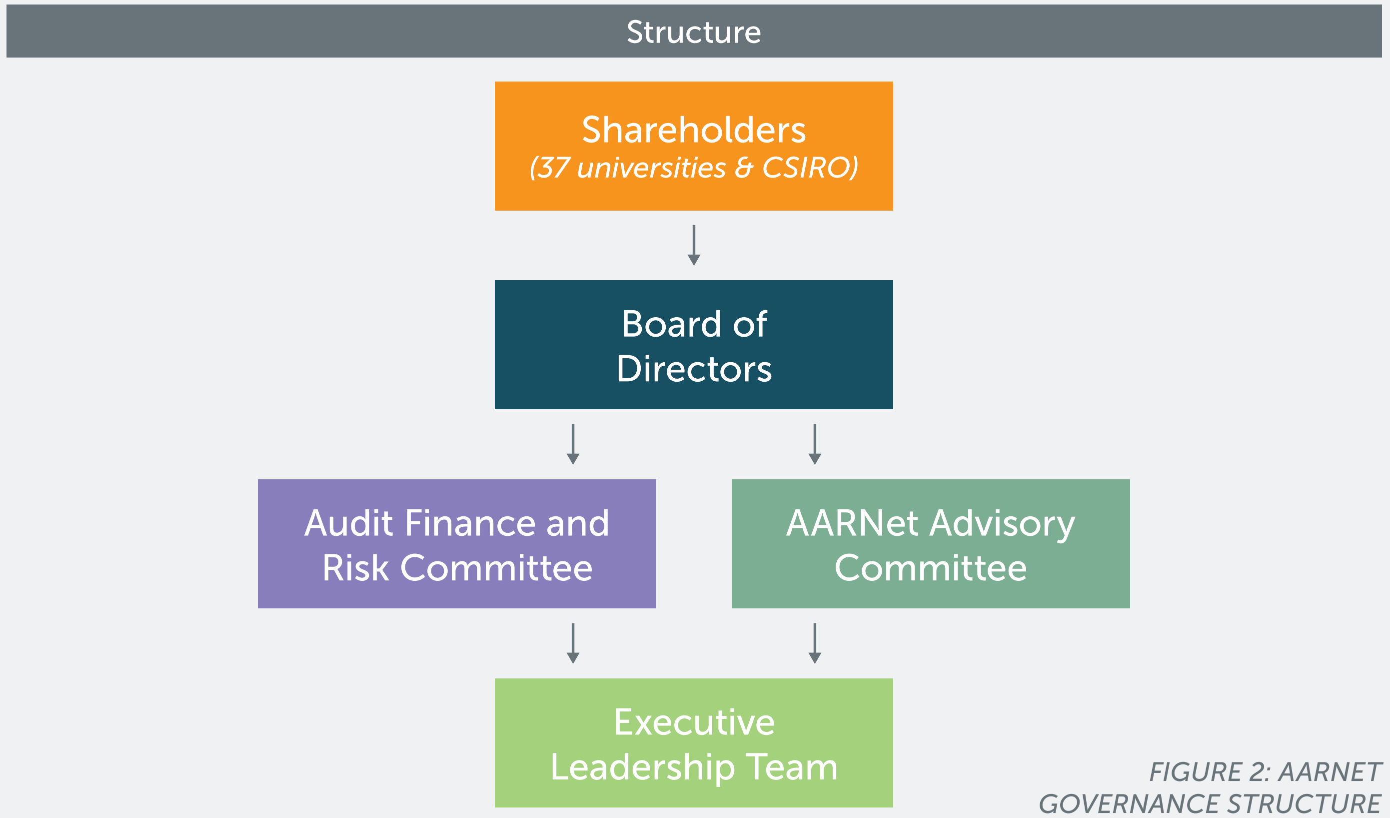


FIGURE 2: AARNET GOVERNANCE STRUCTURE

The Board of Directors is responsible for the overall direction of AARNet and for providing benefits to the shareholders as required under the AARNet constitution. The Board is comprised of representatives from shareholder universities, CSIRO, and independent directors.

The Audit Finance and Risk Committee (**AFRC**) comprises independent directors and is responsible for advising the Board on the appropriateness of financial and performance reporting, risk management and oversight for the company. This includes the approach and actions in relation to the audited annual accounts, internal audit activities, the AARNet Risk management framework and Modern Slavery. The risk management framework is based on the principles of the international standard for risk management (ISO31000) and regular updates are provided to the AFRC and Board.

The AARNet Advisory Committee (**AAC**) represents the interests of the members and is a source of advice on policy and business matters. CSIRO and shareholders in each state elect one representative to the AAC.

The Executive Leadership Team (**ELT**) includes the CEO and direct reports and is responsible for implementing the direction set by the Board and day-to-day management of AARNet.

Workforce

AARNet Pty Ltd has a workforce of 268 employees as of 31st December 2025, which consists of 258 full-time equivalent employees, 7 part-time employees and 3 casual employees. This is an increase of 21 employees compared to 2024. All employees are located in Australia, with offices in Sydney, Melbourne, Brisbane, Canberra and Perth, and employees in South Australia.

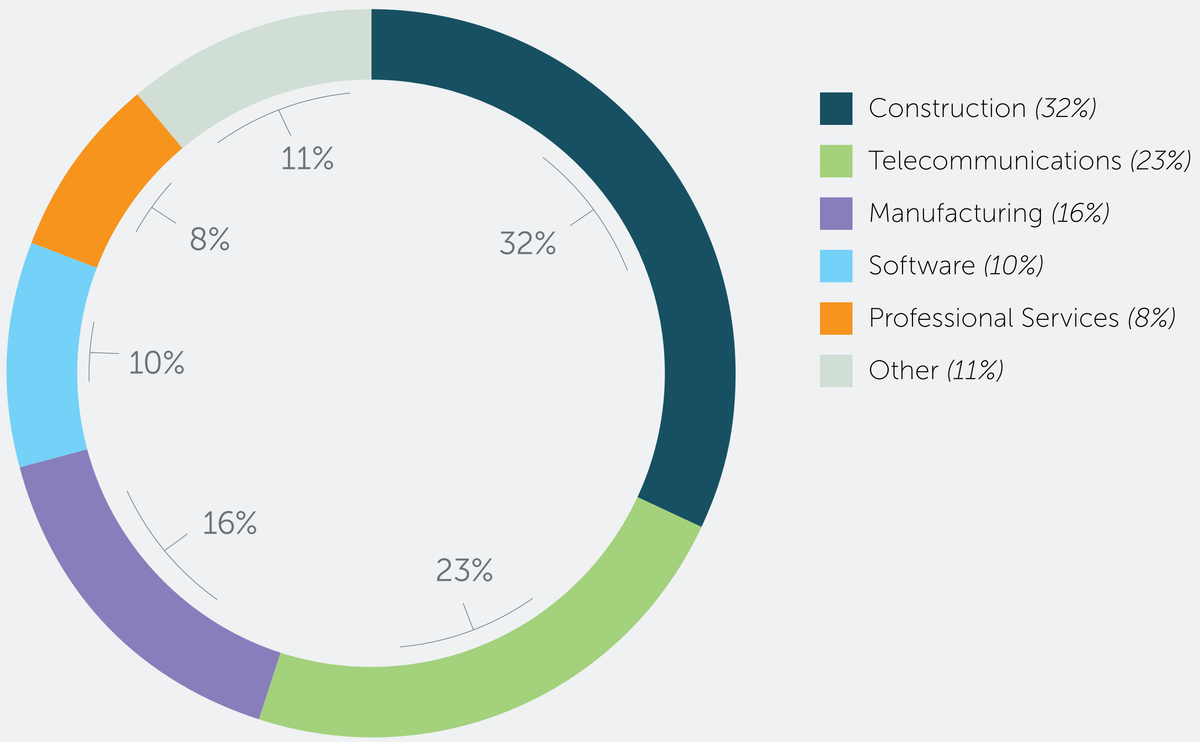
Our supply chain

AARNet engaged directly with over 3,000 suppliers in 2025, including around 450 on account and 2,700 on a transactional basis.

Figure 3 below shows supplier category as a percentage of total spend.

Supply chain spend by category

FIGURE 3: SUPPLY CHAIN BY INDUSTRY / CATEGORY AS A PROPORTION OF TOTAL SPEND



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An analysis of the categories included in *Figure 3* on the previous page is presented in *Figure 4* below.

FIGURE 4: ANALYSIS OF SUPPLIER CATEGORIES

Category	Number of Suppliers	Percentage of Total Spend	Description of Supplier Activities
Construction	48	32%	Construction of new network paths and includes contract labour.
Telecommunications	126	23%	Operation, maintenance and security of the telecommunications network
Manufacturing	28	16%	Manufacturers of equipment used in telecommunications networks and data management.
Software	95	10%	Required across all aspects of constructing, operating, maintaining and securing a telecommunications network
Professional Services	166	8%	Consulting and other specialist services, including construction design, human resources, IT services, marketing, financial and legal advice.
Other	2700+	11%	Includes 21 categories, with 70% of spend in financial services, real estate services, transport, Utilities and Hospitality. The high number of suppliers is due to hospitality, where frequent employee travel for construction or maintenance oversight generates a high volume of low value transactions.

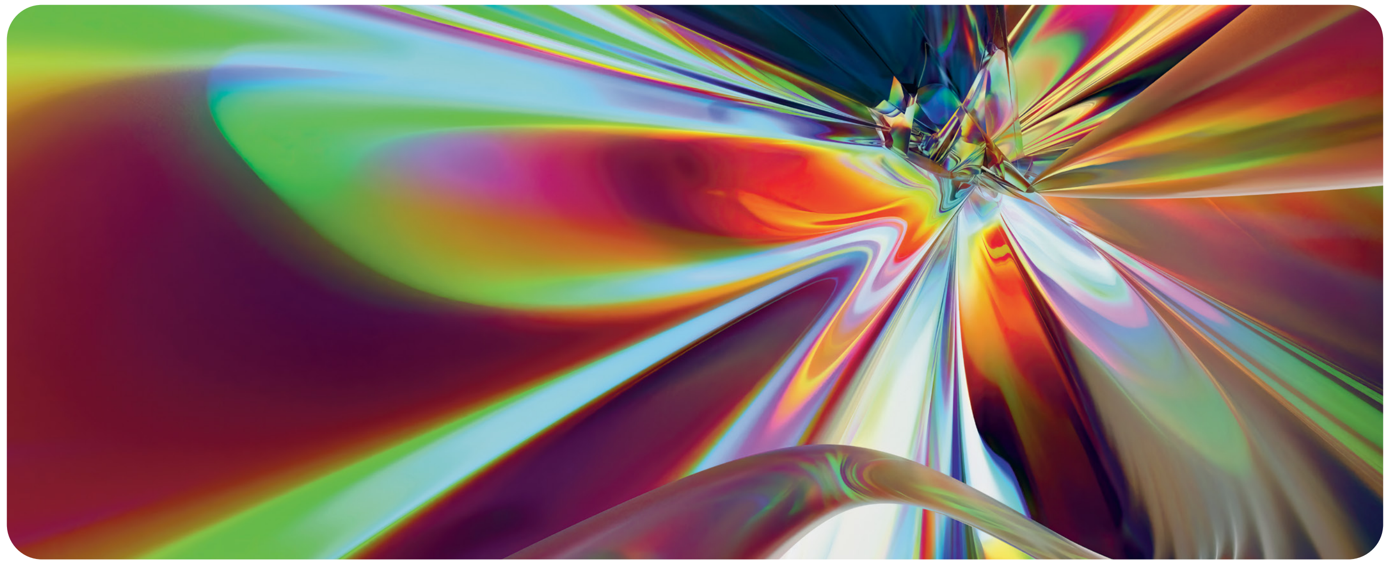
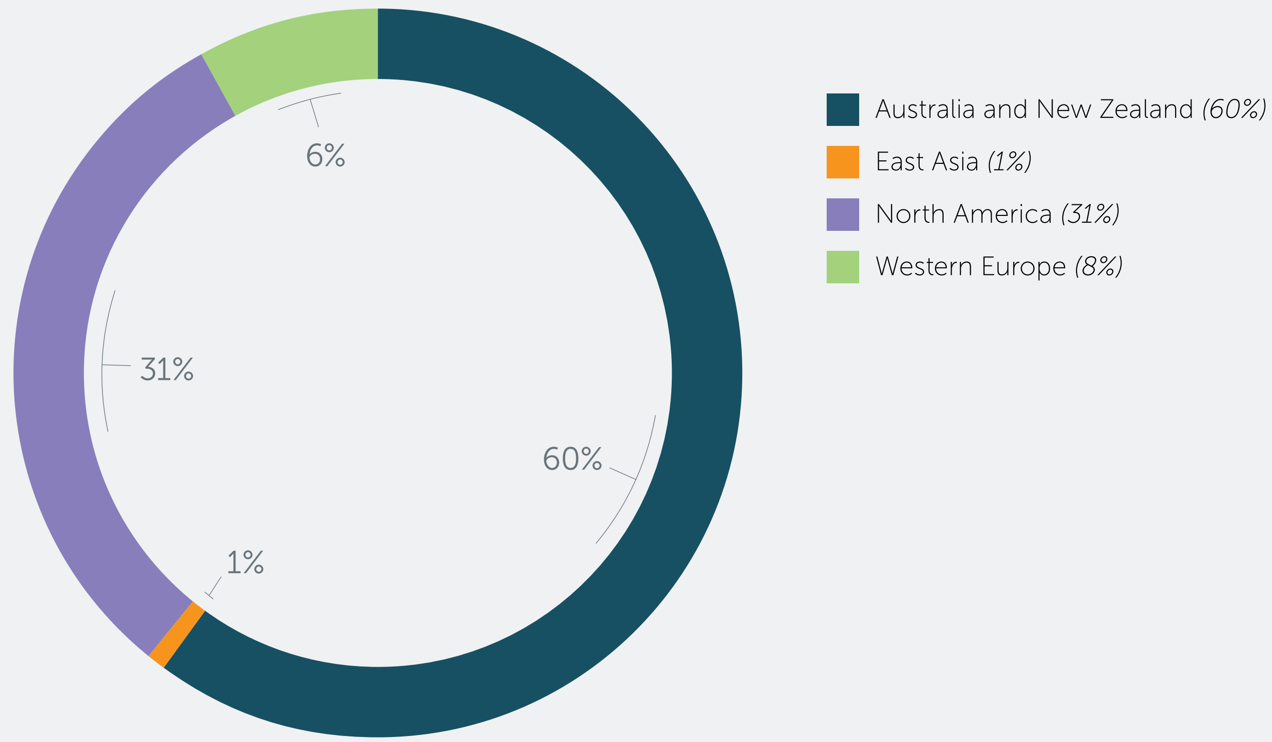


Figure 5 below provides a view of the location of AARNet's supply chain. Efforts have been made to identify each vendor's principal place of business, which represents the main location from which the business is conducted and where decisions are made. Although it is acknowledged that this information may not reflect where goods are manufactured or raw materials are extracted, a broad insight into the composition of the supply chain is provided.

Supply chain spend by location

FIGURE 5: SUPPLIER SPEND BY LOCATION OF PRINCIPAL PLACE OF BUSINESS



Investment portfolio

Our investment portfolio is managed by a third-party investment manager in accordance with AARNet's Investment Policy. The policy states that AARNet will not knowingly invest in any organisation:

1. That operates at the expense of the environment, human rights, public safety, the communities in which the organisation conducts its operations or the dignity of its employees.
2. Where the predominant business is the manufacture, marketing or sale of goods or services that are considered detrimental to the health of communities in which AARNet conducts its operations. Such goods or services include but are not limited to the following products: tobacco, alcohol, gaming, armaments, pornography.

Figure 6 below shows investment portfolio by industry.

Investment portfolio by industry

FIGURE 6: INVESTMENT PORTFOLIO BY INDUSTRY

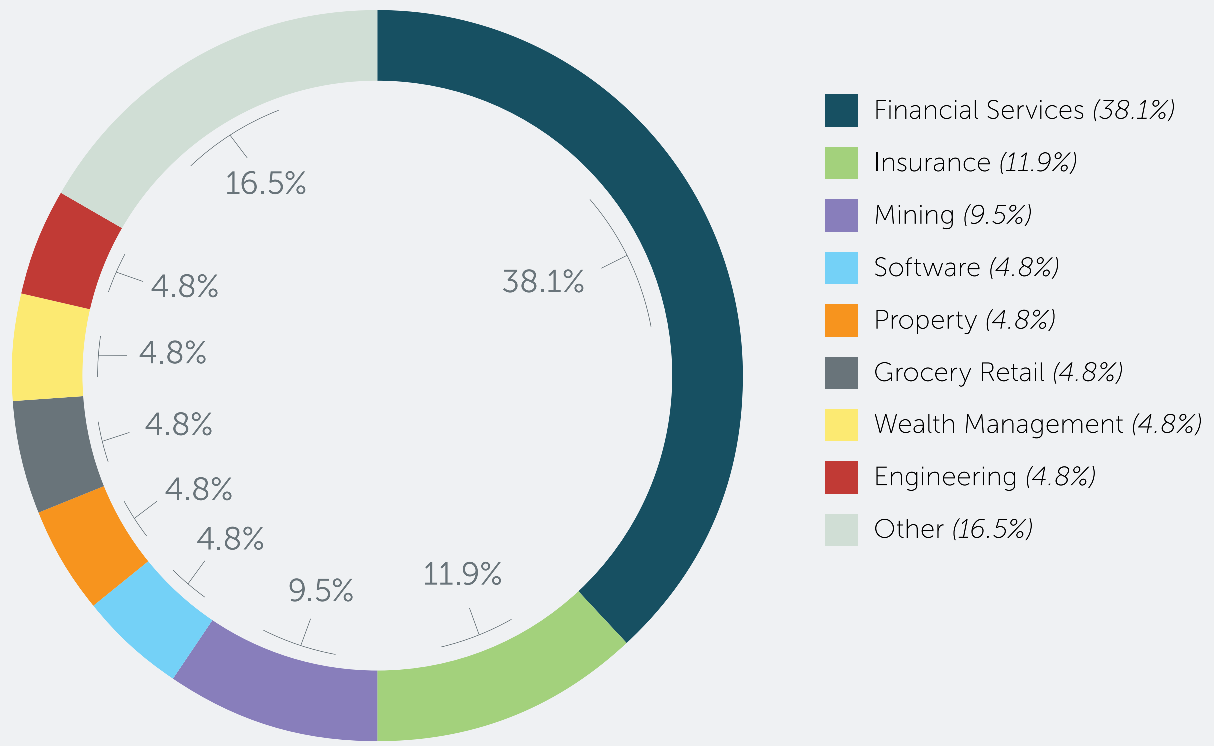
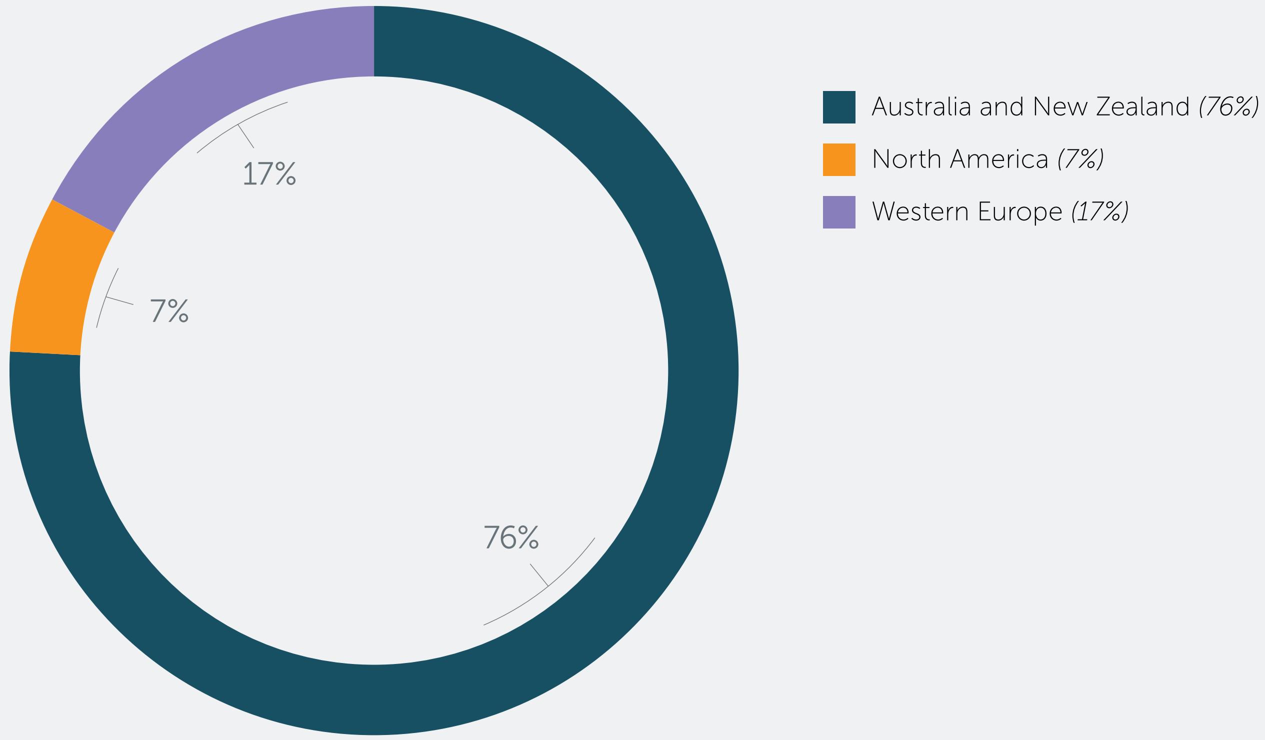


Figure 7 below shows the investment portfolio by principal place of business.

Investment portfolio by principal place of business

FIGURE 7: INVESTMENT PORTFOLIO BY PRINCIPAL PLACE OF BUSINESS



Our modern slavery risks

Risk factors

The four modern slavery risk factors identified in 2023 remain unchanged during 2025. These factors are:

① Vulnerable populations:

These are individuals or groups of people that face discrimination or are in circumstances that lead them to make decisions that carry higher risk. This includes ethnic and religious minorities, women, children, migrants, and refugees. Poverty, a lack of education, events such as the COVID-19 pandemic and ongoing issues like climate change exacerbate the risks of modern slavery globally.

② High-risk business models:

Complex supply chains and employment relationships, particularly outsourcing, sub-contracted, or employed via an agency, present heightened risks. Work that is temporary in nature can also contribute to modern slavery risks.

③ High-risk geographies:

Some countries or regions have higher risks of modern slavery, which is influenced by factors such as poor governance, weak rule of law, conflict, migration flows, and poverty.

④ High-risk categories:

Some sectors, industries, products, services have a high risk of involving modern slavery because of their characteristics, the raw materials or products involved, and processes.

Our operations

AARNet has not identified any instances of modern slavery within the company's workforce and determines the risk within operations as very low.

This is based on the following information:

1. All employees have written employment contracts with terms clearly described.
2. All employees work within Australia and AARNet is subject to Australian employment law.
3. Most employees, whether full-time, part-time or casual, carry professional qualifications and experience so are not considered base skill workers.
4. AARNet's policies and procedures are in place to ensure employees are protected and well informed of their rights.
5. No instances of modern slavery have been reported via the AARNet Whistleblower Policy.
6. AARNet offers flexible employment arrangements to assist employees with managing their lives at work and home.
7. AARNet engages recruitment agencies to find candidates for open roles. All recruitment practices are consistent with company values and policies, and recruitment costs are borne by AARNet.

Our Investments

AARNet recognises potential risks within its investment portfolio managed under the Investment Policy. Given the size of organisations in the portfolio, AARNet's expectation is that these organisations have modern slavery controls and reporting mechanisms in place.

Our supply chain

Using the United Nations Guiding Principles on Business and Human Rights (UNGPs), AARNet determined it may be directly linked to modern slavery risks in its supply chain. Based on the risk factors identified, we acknowledge the following categories are at high risk of modern slavery practices.

Figure 8 below shows AARNet's modern slavery risk areas.

FIGURE 8: AARNET'S MODERN SLAVERY RISK AREAS

Risk Area	Why is this a high-risk area
Network Construction	Use of migrant or temporary workers at base skill levels employed on low wage rates in potentially unsafe conditions. Complex projects and reliance on subcontracting arrangements can obscure monitoring of and accountability for Labour practices.
Manufacture of ICT Equipment	Use of migrant or temporary workers at base skill levels employed on low wage rates. Complex and opaque supply chains can obscure monitoring of and accountability for Labour practices. Suppliers include large, global companies that operate in regions that may have inadequate human rights protections.
Support Services (cleaning, maintenance, waste removal, document management)	Risk of migrant or base skill workers employed on low wage rates. Reliance on subcontracting arrangements can obscure monitoring of and accountability for Labour practices.
Transport and Logistics	Risk of migrant or base skill workers employed on low wage rates. Reliance on subcontracting arrangements can obscure monitoring of and accountability for Labour practices.
Branded Apparel	Risk of base skill workers employed on low wage rates or in forced Labour conditions. Complex and opaque supply chains and reliance on subcontracting arrangements can obscure monitoring of and accountability for labour practices. Suppliers operate in regions that may have inadequate human rights protections.
Hospitality (accommodation, food and drink, events)	Risk of migrant or base skill workers employed on low wage rates. Reliance on subcontracting arrangements can obscure monitoring of and accountability for Labour practices.
Solar Panels	Risk of migrant or base skill workers on low wage rates regions which may involve forced labour conditions. Complex and opaque supply chains can obscure monitoring of and accountability for Labour practices.

Actions taken to address modern slavery

Policy framework

AARNet's first priority is to ensure employees are treated fairly and equitably. An employee policies document is provided to all new employees and is available on the company intranet site for all employees. The document ensures the consistent and efficient operation of AARNet, sets expectations regarding the conduct of employees and management, and helps protects employees by ensuring transparency. The document includes the following relevant sections:

- Employee code of conduct;
- Equal opportunity, anti-harassment, anti-discrimination and anti-bullying;
- Workplace health and safety;
- Market-leading leave options;
- Diversity policy;
- Whistleblower policy provides a reporting mechanism for potential modern slavery concerns; and
- An employee assistance program.

Our **Modern Slavery Policy**, which is aligned to the International Bill of Rights and the UN Guiding Principles, and statement from the Chairman can be found on the AARNet website. The policy affirms AARNet's commitment to contributing to ending all forms of modern slavery, bribery and corruption and outlines the approach taken for reducing the risk of modern slavery practices within the company's operations and supply chains. The policy includes several methods employees or others can report concerns in relation to modern slavery, such as the **AARNet Whistleblower Policy** and the Australian Federal Police.

As outlined earlier in this statement, the composition of AARNet's investment portfolio is guided by the **AARNet Investment policy**. The policy explicitly requires social and environmental considerations in advisor selection, monitoring and day-to-day management.

Recruitment of new employees involves third party recruitment agencies that are specific to the skills required for the role. Recruitment activities were centralised within Human Resources in 2024 to ensure consistency in candidate identification and selection and to deliver improved diversity and inclusion outcomes from recruitment agencies.

During 2025, AARNet approved a **Supplier Code of Conduct**. The Code sets out the minimum expectations of all AARNet's suppliers in the following areas:

- Business integrity;
- Human rights and modern slavery;
- Workplace health and safety;
- Environmental management;
- Security and privacy;
- Government and media communications; and
- Enforcement.

Due diligence

As a regulated entity under Australia's Security of Critical Infrastructure Act 2018 (SOCI Act), AARNet is required to manage risks to the security and resilience of critical telecommunications infrastructure. The Security Legislation Amendment (Critical Infrastructure) Act 2021 established positive security obligations for critical infrastructure providers, including the requirement to implement a Telecommunication Security Risk Management Program (TSRMP). The TSRMP requires a structured, risk based assessment of personnel, supply chain, operational and information security risks, including risks arising from third party suppliers.

AARNet is improving its approach to supplier visibility and due diligence through the development of a material suppliers register supported by enhanced supply chain due diligence processes. During 2025, progress included commencing the identification of material suppliers across the supply chain and updating draft supplier questionnaires to incorporate modern slavery requirements.

This framework complements AARNet's obligations under the Modern Slavery Act 2018 by strengthening supply chain oversight, due diligence and governance, thereby helping to identify, assess and mitigate modern slavery risks within operations and supply chains that support critical infrastructure.

Governance

An Environment, Social and Governance (ESG) Steering Committee comprising several members of the Executive Leadership Team is responsible for the day-to-day operation of the ESG program, including modern slavery. Other AARNet team members are engaged as appropriate.

Capability

There is a modern slavery module in AARNet's online learning management system that outlines how Modern slavery can take place and what steps AARNet can take to prevent it occurring in business dealings and supply chains. The module is included as part of the induction process for all new employees and is completed as a refresher on an annual basis by all employees. During 2025, 88% of employees completed the training module.

Risk management

Included in AARNet's risk management framework is a defined risk of non-compliance with regulatory obligations. The Modern Slavery Act 2018 (Cth) is included within this risk. Corporate risk is regularly reviewed and discussed at ELT, AFRC and Board level.

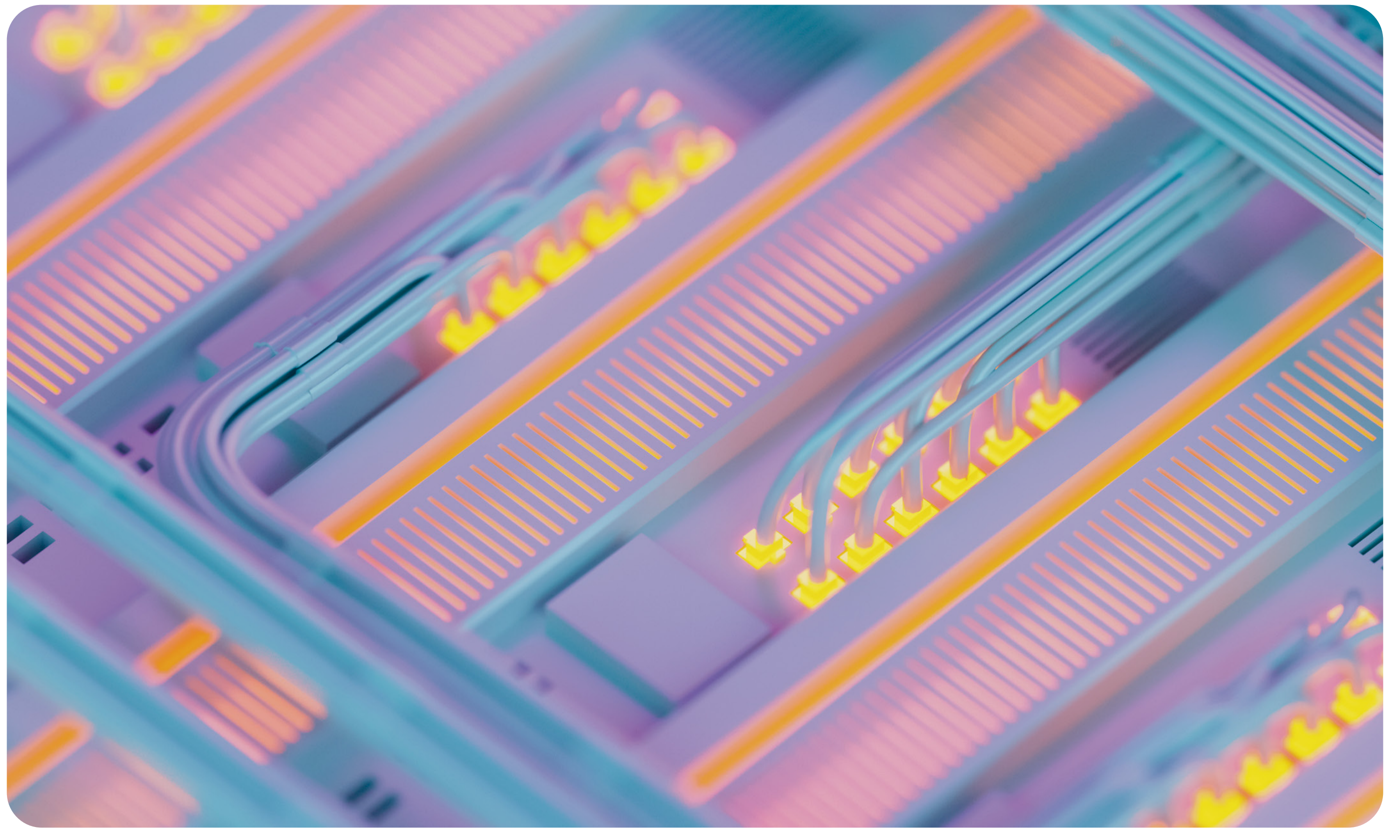
Our future actions to address modern slavery

Policy framework

Supplier Code of Conduct is expected to roll out to all on-account suppliers during 2026. AARNet's policy framework will be reviewed regularly to ensure compliance with evolving legislation and to incorporate capability improvements.

Due diligence

AARNet will continue to develop its Telecommunication Security Risk Management Program (TSRMP), which will include integration of modern slavery considerations into the assessment of supply chain risks, refinement of supplier governance and due diligence processes. The TSRMP will be incorporated into AARNet's broader risk framework.



Assessing the effectiveness of actions

Key performance indicators for the 2025:

88%
Of staff completed their mandatory modern slavery compliance training.

0
Modern slavery incidents during the year.

0
Whistleblowing alerts were raised during the year related to modern slavery.

Consultation

All subsidiaries are 100% owned and controlled by AARNet Pty Ltd. Suppliers engaging with subsidiaries are included in the supply chain analysis and no subsidiary currently has employees; therefore, no separate consultation process was required for this statement.

Any other information

There is no other relevant information to add to this statement.

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