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**2DEGREES MODERN SLAVERY
STATEMENT 2025**



**“FIGHTING FOR
FAIR IS OUR
DRIVING FORCE”**



CEO STATEMENT

At 2degrees our purpose, Fighting for Fair, reflects our commitment to upholding human rights within our operations and throughout our value chain.

We recognise that modern slavery, in all its forms, is a serious violation of human rights and has no place in our business or supply chain. As a New Zealand company operating within a global supply chain, we are committed to continuous improvement, transparency, and collaboration in identifying and addressing modern slavery risks.

Over the past year, we have taken deliberate steps to strengthen our modern slavery framework. These include the introduction of annual training, mapping of key Tier 1 supplier risks, and the establishment of a cross-functional working group to enhance awareness and engagement.

We are proud to present our first Modern Slavery Statement, prepared for publication by the Attorney-General's Department in accordance with the Australian Modern Slavery Act 2018 (Cth). This marks an important milestone in our ongoing commitment to operate ethically and responsibly for our people, our customers, and our communities.

Mark.
Mark Callander
2degrees CEO

REPORTING ENTITIES AND DISCLOSURE NOTES

This Statement is prepared by **2degrees (NZ) Holdings Pty Limited** (ACN 672 623 442) (the “**Reporting Entity**”) in compliance with the Australian Modern Slavery Act 2018 (Cth), on behalf of all wholly owned subsidiaries listed in Appendix A.

References to “2degrees” in this Statement include both the Reporting Entity and its subsidiaries, unless otherwise stated.

This Modern Slavery Statement covers the reporting period 1 July 2024 to 30 June 2025 and represents the first Statement filed by the Reporting Entity.

While the New Zealand entities that make up the majority of the Group are not required to report under New Zealand law, 2degrees has voluntarily published a Modern Slavery Policy Statement in New Zealand since 2023, reinforcing our commitment to responsible business practices and transparency.

WHO WE ARE



2degrees is a leading New Zealand telecommunications provider. Millions of Kiwis rely on our network and services every day, and we also operate a small wholesale service in Australia.

Our New Zealand team of approximately 1,500 people is based across Auckland, Wellington, and Christchurch offices, supported by a nationwide retail network. 2degrees is our primary brand, with smaller brands also represented in our operations.



OUR SERVICES

Our service offerings include:

- Device retailing, including mobile phones, modems, and wearable devices
- Consumer mobile, broadband, and retail energy services
- Public sector and enterprise connectivity services
- Wholesale mobile, broadband, and connectivity services
- Co-location and data centre services .

OUR OPERATIONS

Mobile Network – 2degrees operates 2,225 cell sites¹ nationwide, delivering 4G and 5G services to 98.5% of the places Kiwis live and work. We are also preparing to launch satellite-to-mobile services during calendar 2026.

Fibre Network – 2degrees owns 2,800 km of fibre and holds rights to use a further 1,800 km across rural, urban, and CBD areas, providing resilient connectivity throughout Aotearoa New Zealand.

Data Centres – We operate four North Island data centres, supporting both our own operations and external clients. Most of these premises are leased.

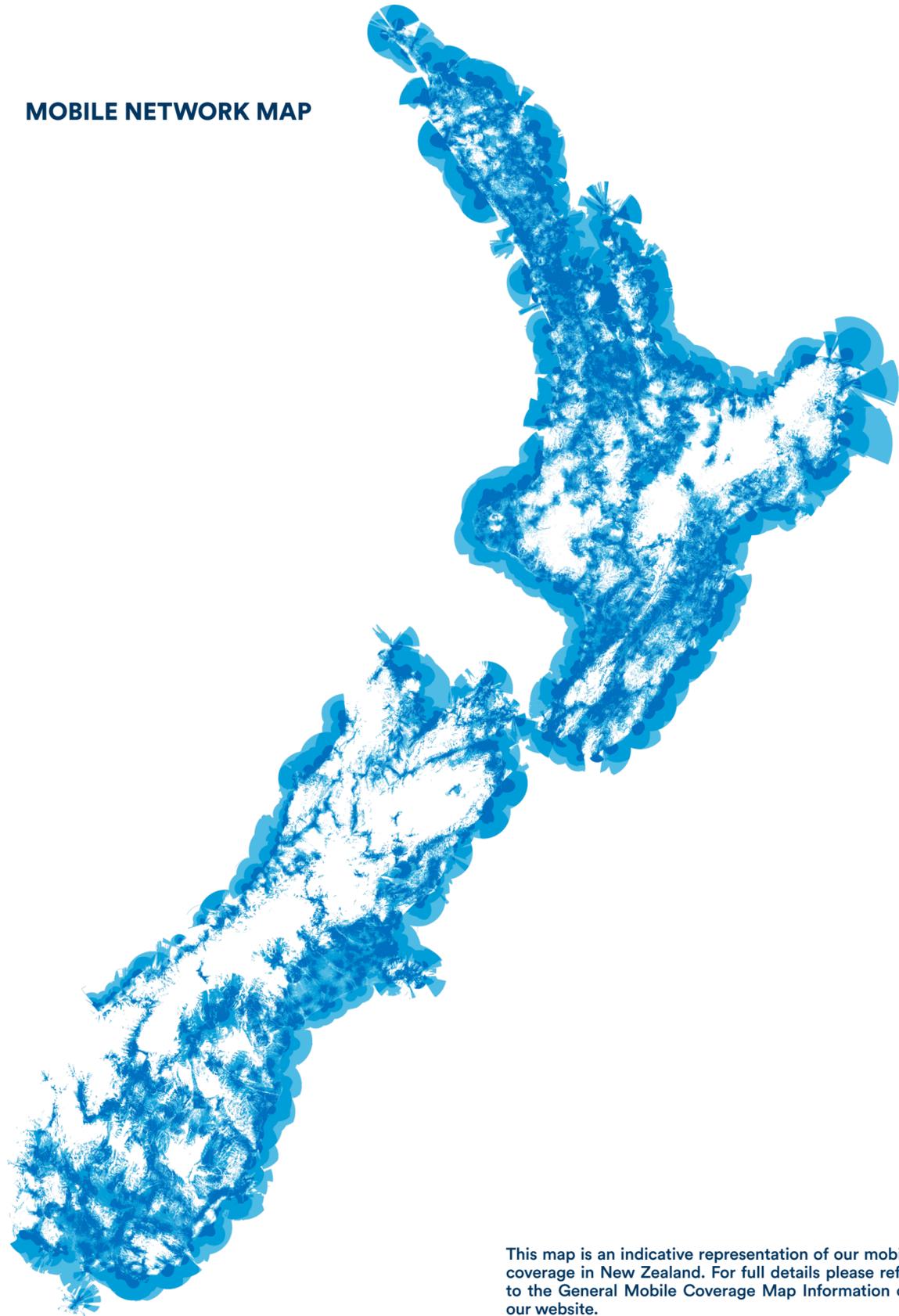
Retail – Our footprint includes 54 corporate and partner retail stores nationwide, alongside partnerships with multi-brand retailers Noel Leeming and JB Hi-Fi.

FIBRE NETWORK MAP



¹As at 30 June 2025

MOBILE NETWORK MAP



This map is an indicative representation of our mobile coverage in New Zealand. For full details please refer to the General Mobile Coverage Map Information on our website.

OUR OWNERSHIP STRUCTURE

2degrees operates through a group of wholly owned entities primarily based in New Zealand. The Group is held by Australian holding companies, including the Reporting Entity, with ultimate ownership shared 50/50 between **funds and vehicles managed by Macquarie Asset Management and Aware Super.**

OUR PEOPLE

Direct Workforce

As at 30 June 2025, 2degrees employed 1,501 staff directly² across New Zealand, all engaged under individual employment agreements.

Within this workforce, we maintain a strong in-house customer care operation of 223 staff, including management, sales, and retention teams. The majority work remotely, improving both employee satisfaction and customer experience.

Indirect Workforce

We also engage an indirect workforce through third-party contracts, including outbound calling agents, door-to-door sales representatives, and dealer-owned retail stores. In addition, a portion of our customer care services is outsourced to a third-party provider with operations located in South Africa.

JOINT VENTURES AND KEY PARTNERSHIPS

Rural Connectivity Group, a joint venture between 2degrees, Spark, and One NZ, established in 2017 to extend rural broadband and mobile coverage across Aotearoa.

Infrastructure Sharing – A long-term arrangement with One NZ enables shared radio access network infrastructure while maintaining separate core networks and spectrum.

Special Projects – 2degrees participates in discrete infrastructure projects to enhance connectivity for national infrastructure such as tunnels and railway corridors.

Further details on our financial performance and business strategy can be found in the **FY25 Annual Update** available at 2degrees.nz.

OUR SUPPLY CHAIN

2degrees operates a complex, globally distributed supply chain comprising around 1,500 Tier 1 suppliers across 28 countries.

Most of our suppliers are based in New Zealand, Australia, and the United Kingdom, with additional relationships spanning Southeast Asia, the Middle East, and Africa. Our supply chain supports network infrastructure, retail operations, customer service, technology, logistics, and professional services.

Suppliers range from large multinationals to smaller local vendors. Our indirect suppliers include subcontractors, particularly in construction, logistics, and outsourced customer care. This multi-tiered structure creates heightened complexity, particularly in areas involving electronics, telecommunications hardware and offshore service delivery.

OUR MODERN SLAVERY RISKS



MODERN SLAVERY RISKS IN OUR OPERATIONS

The risk of modern slavery within our own operations is considered low, given our New Zealand-based workforce, strong employment protections, robust policies, whistleblower reporting processes, and direct employment model.

However, we recognise potential risks through indirect workers, particularly those offshore, due to the reduced visibility of worker conditions in countries with higher modern slavery vulnerability scores than New Zealand³.

MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

During the reporting period, we conducted a Tier 1 supply chain risk mapping exercise to identify potential modern slavery risk factors where we may cause, contribute to, or be directly linked to modern slavery. Using global best practice approaches, we assessed risks by sector, product type, and geography.

Key risks identified include:

- Suppliers operating in countries recognised as having higher vulnerability to modern slavery³.
- Procurement of telecommunications hardware and electronics, recognised globally as high-risk⁴. Examples include SIM cards, handsets, and network equipment, particularly where manufacturing occurs in higher-risk regions.

These insights inform our modern slavery workplan, supplier engagement priorities, audit scheduling, and continuous improvement initiatives.

³2023 Walk Free Global Slavery Index

⁴Commonwealth modern Slavery Act 2018 – Guidance for Reporting Entities, May 2023.

HOW WE ASSESS AND ADDRESS MODERN SLAVERY RISKS

GOVERNANCE

Our purpose — Fighting for Fair — underpins our culture, strategy, and governance. Environmental, Social, and Governance (ESG) matters are overseen by our Board, with annual workplans and compliance frameworks approved by the Audit and Risk Committee.

Our modern slavery approach builds on prior voluntary initiatives, including a publicly available Modern Slavery policy statement, supplier questionnaires and participation in the Joint Alliance for Corporate Social Responsibility (JAC) — a global telecommunications alliance dedicated to ethical and sustainable supply chains.

In FY25, we moved from tactical actions to a more structured and strategic approach, supported by the new Modern Slavery Compliance Framework approved by the Audit and Risk Committee.

The framework outlines activities under six pillars:

1. Policies and Governance
2. Supply Chain Management
3. Risk Assessment
4. Reporting and Transparency
5. Awareness and Training
6. Continuous Improvement

Supporting policies include:

- **Code of Conduct** - sets a framework for working at 2degrees consistent with our Values, our Purpose, and our other Policies and Standards.
- **Business Partner Code of Conduct** – defines our key standards and expectations for fair, safe and responsible working conditions across our supply chain and applies to all 2degrees’ business partners.
- **Whistleblower Policy** - sets out the process for reporting and dealing with any whistleblower concerns at 2degrees in a manner that aligns with, and promotes behaviour consistent with, our Purpose and Values; and complies with applicable legislation.
- **Health, Safety & Wellbeing Policy** - outlines 2degrees’ approach and commitment to Health, Safety and Wellbeing (HSW) across all of its activities.
- **Diversity, Equity, Inclusion and Belonging Policy** - describes what we will do to ensure we create an environment where all people feel comfortable to bring their full selves to work and empowered to contribute their ideas.
- **Bullying and harassment Standard** - outlines 2degrees’ stance on bullying and harassment and how we support our workers. It reinforces the principles outlined in the Code of Conduct and embodied in our values.
- **Recruitment Policy** - sets out the requirements for recruiting people into 2degrees to ensure we hire the right people, with the right values, attitudes and skills to enable 2degrees to be successful well into the future and to ensure effective recruitment processes are followed.
- **Sustainability Policy** – this policy describes how 2degrees embeds and drives sustainable practices within our business operations and wider value chain.



MODERN SLAVERY WORKING GROUP

Established in FY25, this cross-functional group is chaired by a member of the Legal Team and oversees risk assessments, builds organisational understanding, and embeds supplier engagement processes across departments.

HOW WE HAVE ADDRESSED MODERN SLAVERY RISK IN OUR OPERATIONS

We introduced a modern slavery module into our annual corporate compliance training programme, complementing existing mandatory learning. Early participants provided valuable feedback and demonstrated strong engagement, highlighting increased awareness and understanding of the topic.

We also updated our Whistleblower Policy and portal to explicitly reference modern slavery, encouraging the reporting of any related concerns. Appropriate management representatives have been identified to receive and respond to such reports.

HOW WE HAVE ADDRESSED MODERN SLAVERY RISK IN OUR SUPPLY CHAIN

PROCUREMENT PHASE

Modern slavery considerations are embedded across our procurement lifecycle through:

- ESG questionnaires in all RFPs which include assessment of modern slavery and worker exploitation risks.
- Supplier adherence to our Business Partner Code of Conduct, which includes our expectations for fair, safe and responsible working conditions.
- Updated supplier contracts that clearly articulate our requirements in respect of modern slavery matters and strengthen our audit rights.

SUPPLIER MANAGEMENT

Our Commercial Team maintains close oversight of key suppliers and manages our participation in the JAC, a key process for assessing and responding to modern slavery risks in our supply chain.



The JAC alliance is a global alliance of telecommunications companies, with members from across the globe, focused on improving social, environmental, and ethical performance in the ICT supply chain. As a member since 2022, 2degrees:

- Audits at least five suppliers annually using the JAC framework
- Follows up on corrective actions
- Shares outcomes and best practices with other JAC members

In FY25, we conducted JAC audits with suppliers in China, Czech Republic, India, and New Zealand.

In addition to JAC activities, we visit key supplier locations such as our South African-based third-party customer care provider.

We also maintain a regular vendor management programme, assessing business-critical suppliers quarterly against key criteria including quality, delivery, cost, health and safety matters, and compliance with our Business Partner Code of Conduct. The process includes in-person meetings where feedback and priorities are discussed.

REMEDIATION

Findings identified through JAC audits are tracked and addressed. As of FY25, five corrective findings remained open and are being actively resolved. No separate modern slavery incidents were identified during the reporting period.



HOW WE CHECK THE EFFECTIVENESS OF OUR ACTIONS

2degrees manages risk through a structured governance framework with oversight from both the Board and Executive. Risks are assessed using a consistent methodology that evaluates impact, likelihood, and exposure.

The Board and Audit and Risk Committee monitor progress against the annual Modern Slavery Workplan, review policies and charters, and oversee whistleblower reports quarterly.

Compliance training completion rates are monitored, and participant feedback is used to improve future modules. Supplier audits and open findings, both within the JAC framework and our internal audit activities, are tracked until closure. Broader benchmarking tools, including the Walk Free Industry Benchmark, are used to measure the maturity of our modern slavery practices.

HOW WE CONSULT WITHIN OUR GROUP

The Modern Slavery Working Group includes representatives from Legal, Risk, Commercial, Sustainability, and People teams, with additional departments engaged as needed.

Management reports modern slavery matters regularly to the Board and Audit and Risk Committee of the New Zealand governing entity, and annually to the Board of the Reporting Entity, ensuring appropriate visibility and oversight.

Although 2degrees operates through multiple legal entities, these operate as a single integrated business with unified procurement, legal, and governance processes.

OUR PROGRESS AND COMMITMENTS

In FY25, we made strong progress further embedding modern slavery into our operations, including:

- Development and implementation of a Modern Slavery Compliance Framework
- Launch of annual modern slavery training
- Mapping of key Tier 1 supply chain modern slavery risks
- Bolstering supplier due diligence and contractual protections for modern slavery matters

LOOKING AHEAD: FY26 COMMITMENTS

In FY26, 2degrees will continue strengthening its modern slavery risk management and response through:

- **Governance & Policy:** Ongoing review and enhancement of frameworks and incident response processes
- **Supply Chain Management:** Enhanced oversight and assurance for higher-risk suppliers
- **Risk Assessment:** Expanded due diligence, especially for elevated-risk categories
- **Reporting & Transparency:** Improved data collection, data classification, control effectiveness assessment, and performance tracking
- **Awareness & Training:** Continued rollout of internal training and awareness activities

APPROVAL

This Modern Slavery Statement was approved by the **Board of 2degrees (NZ) Holdings Pty Limited**, as the principal governing body of the Reporting Entity under the Modern Slavery Act 2018 (Cth), on [Insert Date].

Signed by a Responsible Member of 2degrees (NZ) Holdings Pty Limited.

DIRECTOR

CORPORATE ENTITIES

APPENDIX

Name of entity	Location	Company Number	Principal activity
2degrees (NZ) Operations Pty Limited	Australia	ACN 672 623 568	Holding company
2degrees Group Limited	New Zealand		Holding company
Orcon Holdings Limited	New Zealand		Holding company
Two Degrees Group Limited	New Zealand		Holding company
Vocus (New Zealand) Limited	New Zealand		Network infrastructure company
Vocus Group NZ Limited	New Zealand		Holding company
Data Lock Limited	New Zealand		Network infrastructure company
M2 Group NZ Limited	New Zealand		Holding company
CallPlus Holdings Limited	New Zealand		Holding company
2Talk Limited	New Zealand		Service provider
CallPlus Australia Holdings Limited	New Zealand		Holding company
CallPlus Limited	New Zealand		Holding company
Blue Reach Limited	New Zealand		Network infrastructure company
Slingshot Communications Limited	New Zealand		Service provider
CallPlus Services Limited	New Zealand		Service provider
CallPlus Trustee Limited	New Zealand		Dormant trustee
Orcon Limited	New Zealand		Service provider
CallPlus Assets Limited	New Zealand		Network infrastructure company
M2 NZ Limited	New Zealand		Holding company
Switch Utilities Limited	New Zealand		Service provider
Switch Utilities Southern Limited	New Zealand		Service provider
Switch Utilities Wellington Limited	New Zealand		Service provider
NZ Fibre Communications Limited	New Zealand		Service provider
2talk Pty Limited	Australia		Service provider
Two Degrees Holdings Limited	New Zealand		Holding company
TDRG Limited	New Zealand		Holding company
Two Degrees Mobile Limited	New Zealand		Retail service provider
TDNG No.1 Limited	New Zealand		Holding company
Two Degrees New Zealand Limited	New Zealand		Retail service provider
Two Degrees Networks Limited	New Zealand		Network infrastructure company
NZ Communications Trustee Limited	New Zealand		Dormant trustee
2 Degrees Mobile Limited	New Zealand		Dormant company
TwoDegrees Limited	New Zealand		Dormant company
Tulle US LLC	Delaware, United States of America		Dormant company

APPENDIX

Mandatory Criteria	Page number/s
Identify the reporting entity.	4
Describe the reporting entity's structure, operations and supply chains.	6-8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	10
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	11-12
Describe how the reporting entity assesses the effectiveness of these actions	13
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	13



MANDATORY CRITERIA



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