

This modern slavery statement is made by Radlink Pty Ltd (ACN 128 968 865) as trustee for the Radlink Unit Trust (ABN 62 890 602 388) trading as Radlink Communications.

This statement has been prepared for the financial year ending 30 June 2022 (Financial Year).

In accordance with the Modern Slavery Act 2018, this statement outlines the steps that Radlink has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

## 1 Commitment to Combatting Modern Slavery

Radlink is committed to acting ethically and with integrity in all of Radlink’s business dealings and relationships and to taking steps to implement and enforce effective systems and controls to limit the risk that modern slavery practices are taking place in Radlink’s business or supply chains. Radlink is also committed to ensuring there is transparency in its own businesses and in Radlink’s approach to tackling modern slavery in Radlink’s supply chains.

## 2 Radlink Structure and Operations

Radlink is a leading Australian company that was formed in 2007 and employs staff across Australia. Radlink is an end to end, turn key communications solutions both nationally and internationally. Offering design, supply, installation and commissioning, integration and support of communication networks.

Radlink has a wide portfolio with an in-house engineering and design team, as well as nation-wide field services capability with civil, rigging, installation, electrical, commissioning and maintenance services.

Radlink employs approximately 350 people throughout Australia. Radlink’s head office is located at 22 Oxleigh Drive, Malaga WA 6090.

More detail about Radlink is available from the Radlink Website:

<https://www.radlink.com.au/>

## 3 Radlink’s Supply Chain

Expenditure Category	Typical goods and services
Services	<ul style="list-style-type: none"> <li>▪ Construction and civil works</li> <li>▪ Network Inspection and Maintenance</li> <li>▪ Plant and Equipment Hire</li> <li>▪ In-house design, drafting and engineering</li> </ul>
Equipment	<ul style="list-style-type: none"> <li>▪ Structures</li> <li>▪ Portable / mobile digital radios</li> <li>▪ Shelter/sea containers/outdoor cabinets</li> <li>▪ Fibre/copper installation</li> <li>▪ Remote base stations (RBS)</li> </ul>
Fleet and Property	<ul style="list-style-type: none"> <li>▪ Commercial vehicles, parts and accessories</li> <li>▪ Fuel</li> <li>▪ Property Management services and equipment</li> <li>▪ Waste Management services</li> </ul>

Expenditure Category	Typical goods and services
Information communications and technology	<ul style="list-style-type: none"> <li>▪ IT Software and services</li> <li>▪ IT hardware</li> <li>▪ Telecommunications services</li> </ul>
Corporate Services and equipment	<ul style="list-style-type: none"> <li>▪ Labour services</li> <li>▪ Safety equipment and work wear</li> <li>▪ Stationery and corporate equipment</li> </ul>

Radlink’s direct suppliers are mainly located in Australia with some suppliers in China, Denmark and United Kingdom.

## 4 Assessing the Risks of Modern Slavery Practices

### 4.1 Assessment

At the end Financial Year 2021-2022, with the completion of the financial statement in October 2022, Radlink carried out an initial assessment of the business and supply chains to assess the risks of modern slavery practices. “Risks of modern slavery practices” refers to the risk that Radlink may cause, contribute to, or be directly linked to, modern slavery through our own business operations or our supply chains. We did this by assessing our operations and supply chains with the involvement of a range of our teams, including operations, procurement, Finance & Health Safety Environment & Quality throughout our operations.

We determined that, in our direct business operations, which are carried out in Australia, particularly our employment processes, there is no areas of high risk that have been identified in Radlink’s direct operations, as the labour market in Australia is highly regulated and strict regulations apply.

Where goods and services are provided by other organisations rather than directly through Radlink, these continue to be assessed and managed to minimise modern slavery risks. A risk assessment against our suppliers (and other entities in our supply chain) identified potential high risk of exposure to modern slavery, particularly for the suppliers and other entities operating in jurisdictions considered high risk, that is, where modern slavery practices are known to occur.

In implementing our Modern Slavery Policy during 2022, Radlink is prioritising focusing on those areas of our supply chains that involved high risk geographic locations and focussed on risks with our direct suppliers.

It is acknowledged that, as we continue to consider this risk and necessary steps to implement our Modern Slavery Policy, Radlink will need to develop a plan to engage with our direct suppliers located in other jurisdictions, having regard to risk factors other than geographic risk (such as sector, industry, product and services risks), and also to engage with entities deeper within our supply chains.

### 4.2 Risks in Radlink’s supply chain

Having regard to the risks that Radlink identified, the areas for focus for Radlink during the financial year are the supply agreements we have in place for:

- The manufacture and supply of communication equipment and infrastructure from China
- The manufacture and supply of Gen-Z batteries (Built in China containing some components from Lesotho (South Africa))
- China and Lesotho are referred to in this statement as a **High-Risk Jurisdiction**.

## 5 Radlink’s Modern Slavery Policy

During 2022 Radlink reviewed, and then communicated, our Modern Slavery Policy and rolled out our Modern Slavery Training Program on how to identify and report concerns relating to modern slavery practices to relevant Radlink personnel.

Our Modern Slavery Policy applies to Radlink. Radlink’s Modern Slavery Policy sets out Radlink’s commitment to:

- Limit the risks of modern slavery practices in Radlink’s business and supply chains
- Take action to assess and address those risks of modern slavery practices in Radlink’s business and supply chains; and
- If Radlink identifies that it has directly caused or contributed to adverse modern slavery impacts in its business or supply chains, take appropriate remediation action.

Radlink encourages openness by Radlink’s directors, officers, managers, employees and consultants (personnel) and supports all personnel who may raise issues relating to modern slavery. Personnel are also encouraged to provide feedback on our Modern Slavery Policy and suggest ways it can be improved.

## 6 Due Diligence and Remediation Processes

Due diligence processes are the ongoing management processes Radlink adopts to identify, prevent, mitigate and account for the risks of modern slavery practices. Radlink will introduce updated due diligence processes designed to identify and assess potential modern slavery risks in our supply chains and mitigate the risk of modern slavery occurring in our supply chains, in each case, focusing on our suppliers in High-Risk Jurisdictions. These due diligence processes will be implemented during the calendar year (2023).

Remediation action is required only where Radlink identifies that we caused or contributed to modern slavery practices. Remediation action seeks to overcome the adverse impact that any such modern slavery practices have had on impacted individuals.

## 7 Monitoring our Effectiveness

Radlink has appointed its National HSEQ Manager as the Compliance Manager under our Modern Slavery Policy. The Compliance Manager has day-to-day responsibility for ensuring personnel understand their obligations under our Modern Slavery Policy, developing training programs, working with other personnel to engage with suppliers and build awareness of modern slavery practices, monitoring the use and effectiveness of our Modern Slavery Policy and working with other personnel to ensure continued improvement in Radlink’s actions to address modern slavery risks in its business and supply chains.

The Compliance Manager is supported by other Radlink personnel as necessary to carry out this role. Radlink’s Senior Management will, at its Management Meeting, consider and track progress of the implementation of the Policy and surveys of suppliers in High-Risk Jurisdictions.

## 8 Plans for Future Action

Over the next year, having regard to the impact the current global pandemic will have on our ability to take particular actions, Radlink will focus on taking steps towards ensuring that:

- Update contracts to include modern slavery provisions
- All of its suppliers and subcontractors in High-Risk Jurisdictions have Radlink’s new standard modern slavery provisions included in their contracts
- If existing contracts are renewed, or new supply contracts are entered into, these contracts contain Radlink’s standard modern slavery provisions

- Questionnaires to be undertaken of Radlink’s key suppliers in High-Risk Jurisdictions and the questionnaire is also included in Radlink’s Contractor Prequalification process; and
- Continue the rollout of Radlink’s Modern Slavery Training program on how to identify and report concerns relating to modern slavery practices is provided to relevant personnel and contractors.

**9 Governance**

Radlink are committed to high standards of corporate governance. Our directors and relevant executive provide the direction and leadership to implement appropriate levels of governance across our organisation consistent with Radlink’s objectives. This includes ensuring that in dealing with suppliers, our decisions and actions are based on transparency, integrity, responsibility and performance, which promotes the long-term sustainability and ongoing success of our business.

Radlink will continue to review our policies and procedures to ensure we have sound governance processes in place to meet our modern slavery compliance requirements. Radlink will conduct reviews of policies, such as our code of conduct and Whistle-blower, to ensure inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in our business and supply chain.

**10 Governing body Approval**

This Statement is made pursuant to the Modern Slavery Act 2018 (Cth). The board of directors forms the governing body for Radlink Pty Ltd. The Managing Director is a responsible member of the governing body. This statement was approved by the board of directors on the 14<sup>th</sup> April 2023



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**Signature of Managing Director**

Jim Reid  
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**Name**  
**Radlink Pty Ltd – Managing Director**

14<sup>th</sup> April 2023  
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**Date**

## 11 Definitions

### 11.1 Definition

Term	Definition
<i>Modern Slavery</i>	<ul style="list-style-type: none"> <li>▪ Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.</li> <li>▪ Practices that constitute modern slavery can include:               <ul style="list-style-type: none"> <li>▪ Human trafficking</li> <li>▪ Slavery</li> <li>▪ Servitude</li> <li>▪ Forced labour</li> <li>▪ Debt bondage</li> <li>▪ Forced marriage, and</li> <li>▪ The worst forms of child labour.</li> </ul> </li> </ul>

## 12 References

Reference Documents	
<i>Internal Documents</i>	<ul style="list-style-type: none"> <li>▪ Code of Conduct</li> <li>▪ Whistle-blower Policy</li> <li>▪ Contractor Management Procedure</li> </ul>
<i>External Documents</i>	<ul style="list-style-type: none"> <li>▪ Modern Slavery Act 2018</li> </ul>