



Modern Slavery Statement

Reporting Period: 1 July 2021 to 30 June 2022

Reporting Year: One (First Reporting Period)

About this Statement

This joint modern slavery statement (**Joint Statement**) is a consolidated description of the actions taken to address modern slavery risks by the ATN Reporting Entities that comprise Indara and has been published as a joint Modern Slavery Statement in accordance with Section 14 of the Modern Slavery Act 2018 (Cth) (MSA). Throughout this Statement, the terms "ATN", "ATN Group", "Indara", "we", "our", and "us" are used to refer collectively to the entities within the ATN Reporting Entities set out in **Appendix 1, 2 and 3** (which also cover the relevant periods) unless otherwise stated.

As noted, this Statement covers the ATN Reporting Entities identified in **Appendix 3** (including the Axicom entities) from 9 May 2022, being the date the Axicom entities were acquired by Indara. The Axicom entities have not submitted a Modern Slavery Statement for their reporting period of 1 January 2021 – 31 December 2021 (Axicom 2021 reporting period) prior to the acquisition of the Axicom entities by Indara, and the current ATN board was not part of the Axicom business during the Axicom 2021 reporting period. The ATN Board is not in a position to submit a Statement on behalf of the Axicom entities for the Axicom 2021 reporting period.

Indara is submitting its first joint modern slavery statement for the reporting period of 1 July 2021 to 30 June 2022 (**First Reporting Period**). Indara has structured this Joint Statement to clearly address all seven mandatory criteria for a modern slavery statement under Section 16 of the Modern Slavery Act.

We look forward to reporting on our progress as we implement these measures listed through Indara's modern slavery compliance roadmap (Please see [Section 8 – Looking Forward – Modern Slavery Compliance Roadmap](#) for additional information).

Approval and signing

This joint modern slavery statement was approved by the Board of Australian Tower Network Pty Limited, as the principal governing body of the ATN Reporting Entities, on 16 December 2022. The Board approved this joint modern slavery statement on behalf of each of the ATN Reporting Entities (for the respective periods set out in **Appendix 1, 2 and 3**).



Signature:
22 Dec, 2022 11:38:57 AM GMT+11

Terry Sinclair, Director
Australia Tower Network Pty Ltd
21 December 2022



1. Who Indara Is

Australia Tower Network Pty Ltd (ATN) was incorporated on 28 August 2020. Singtel ATN Pte Ltd (a private company limited by shares, incorporated on 21 August 2020 in Singapore) established ATN to own and operate the passive mobile tower infrastructure that was previously integrated within Optus Mobile Pty Ltd. ATN did not trade during the period 28 August 2020 to 31 March 2021.

On 1 April 2021, Australia Tower Network Pty Ltd acquired certain network assets and other assets and liabilities from Optus Mobile Pty Ltd.

On 1 November 2021, Singtel sold a 70% stake in ATN to AustralianSuper.

On 9 May 2022, ATN acquired Axicom Group, another owner and operator of shared wireless infrastructure, with approximately 2000 mobile tower sites in Australia. Following the Axicom acquisition, Singtel's shareholding in the combined ATN/Axicom business has been 18%, with AustralianSuper at 82%.

On 30 September 2022, ATN completed the acquisition of the ENE.HUB and HUB Group entities. ENE.HUB and HUB enable smart cities by connecting, activating, and measuring engagement in public places and spaces (Please see [Section 2.2.2 Services](#) for further information).

On 11 October 2022, ATN unveiled a new name and brand identity, Indara Digital Infrastructure (Indara), reflecting the company's transformation and vision to become the leading provider of innovative infrastructure to support smarter and more connected communities.





Indara is Australia's leading owner and operator of tower and rooftop telecommunication sites throughout Australia. In addition to Indara's core business of acquiring, designing, building and managing towers and rooftops, Indara provides expert engineering, Site Acquisition, Environment and Design (SAED), and property management services to help customers accelerate deployment and easily expand their networks. Indara has sites throughout Australia, including all major metropolitan cities, regional and rural areas and remote locations.

Indara is committed to doing its part as a business to combat modern slavery and we recognise the need for our organisation to assess and address the modern slavery risks in Indara's operations and supply chains. Indara supports the Commonwealth Government's introduction of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) as an essential milestone towards combatting modern slavery.

1.1 Indara Culture & Values

Our values (Please see [Figure 1 – Indara Values](#) below) and Code of Conduct guide our actions and support our purpose and vision.

Figure 1 – Indara Values

	<p><u>Safety & Wellbeing Centric</u></p> <p>"We deliver with care as a team, and for our customers"</p>	<p>Physical and mental health & wellbeing influences everything we do, guides how we support one another, engage with our customers and communities.</p>
	<p><u>Creatively Simple</u></p> <p>"We are simple to do business with"</p>	<p>We are known for being easy to do business with, and translate the complexities of our services into simple solutions for our customers as strategic partners.</p> <p>Enabling our customers and focusing on genuine customer centricity is core to how we deliver, with smart, agile and scalable solutions backed by technical excellence.</p> <p>Our aim is to work smarter, and look for opportunities to continually evolve and innovate, to create new and better ways of working.</p>
	<p><u>Connected by Purpose</u></p> <p>"We are deliberate in our actions"</p>	<p>Why we do things, and a common sense of purpose beyond profit, forms the basis of our inspiration to deliver, influencing how we deliver against our Strategy, in support of each other and strong outcomes for our customers.</p> <p>We connect with our customers and leverage our inclusive and diverse teams to create the best outcomes, aligned to our vision.</p>
	<p><u>Consistent Recognition</u></p> <p>"We are thought leaders within the industry, who recognise achievement of outcomes"</p>	<p>We recognise how our Industry, communities and the world are changing and know how we can be leaders in innovation, customer delivery and new ideas.</p> <p>We recognise and reward the right behaviours, actions and the achievement of outcomes.</p> <p>We strive to be the standard bearers, and look for ways to lift and shift our standards to remain a competitive, independent leader.</p>

2. Indara's Structure, Operations and Supply Chains

2.1 How Indara is Structured

All sixteen ATN Reporting Entities are private companies incorporated in Australia. Australia Tower Network Pty Limited (ACN 643 875 165) (an ATN Reporting Entity) is the ultimate parent company of the ATN Reporting Entities. Indara's Head Office is in St Leonards, Sydney, NSW, and we have offices in Melbourne, VIC and Brisbane, QLD. As at 30 June 2022, Indara had 241 workers (comprised of permanent and fixed-term employees).

Please see the [About This Statement](#) section and [Appendix 1,2,3](#) for additional information.



2.2 What Indara Does

Indara's new business was formed through the integration of Axicom and Australian Tower Network to create Indara, Australia's leading provider of digital infrastructure.

Indara's core business is in owning, building, operating and managing an increasingly diverse network of critical physical and digital infrastructure.

With over 4,300 sites in Indara's expanding portfolio, our infrastructure comprehensively covers the nation, helping more Australians access the developing technologies shaping our contemporary digital society.

Indara's customers include major wireless carriers, emergency services, State and Federal government agencies and wireless broadband data service providers.

2.2.1 Solutions

Indara provides critical infrastructure solutions that empower a better digital future for our communities.

- **Towers:** Strategically located in premium areas, Indara's rapidly expanding tower network provides services where they are needed most, driving long-term value for Indara's customers and partners.
- **Rooftops:** Ensuring fast, seamless, efficient deployment and management of critical connectivity services in built-up urban areas.
- **Inbuilding:** Attract new tenants, improve retention and user experiences with enhanced multi-operator mobile connectivity indoors.
- **Multi-Function Poles:** Enabling smarter, better-connected cities and public places with multi-function poles supporting small cell deployment and smart city services.

2.2.2 Services

Indara offers expert engineering, build and property management services are designed to exceed customer expectations and accelerate network deployment programs, regardless of type or size.

- **Engineering**
 - **Tower Upgrades:** Indara offers end-to-end tower portfolio solutions that utilise our extensive engineering expertise, improving tower strength and longevity.
 - **Portfolio Health:** Portfolio Health Services ensure that customers reduce risk and maximise return on investment across their portfolio of sites.
- **Structel**
 - **Capacity Enhancement:** Maximise tower capacity and remove or reduce the need for tower strengthening with Indara's unique engineering capabilities.

- **Engineering Assessments:** Indara's goal is to deliver the most effective and efficient management of tower capacity for Indara's customers to ensure access to existing towers with minimum delays and upgrade expenditure.
- **Mount and Headframe Designs:** We can design new antenna mounts and headframes to facilitate customer antenna configuration to attach to a tower or building. We also structurally assess existing mounts for proposed changes in loading conditions.
- **Tower Upgrade Design & Implementation:** Indara's engineering team can deliver innovative, cost-effective, modular tower upgrade options to increase the capacity of almost any tower.
- **Design Manuals:** The extensive tower and engineering experience accumulated by Structel can be accessed by Indara's customers who would like support compiling design manuals and engineering guidelines ensuring desired objectives are achieved whilst meeting regulatory compliance.
- **General Consultancy:** Indara's full suite of solutions of structural engineering products and services provides clients with a one-stop shop for identifying and quantifying engineering problems; assessing the options and viable solutions; and supplying detailed designs that allow you freedom when sourcing installation and construction services.

- **Deployment**

- **Site Acquisition, Environment, Design (SAED):** We offer a comprehensive suite of site development services from site feasibility through to detailed design, engineering and full SAED services, to help Indara's customers rapidly deploy their network requirements.
- **Build to Suit:** We provide the full suite of site development services from site identification through to construction. We build towers where Indara's customers need them most, working in close collaborative partnerships to deliver long-term strategic value.

- **Smart City**

- **Integrated Technologies:** Indara's ecosystem of smart city infrastructure is opening the way for major advances in communications, power provision, safety and environmental care.
- **Data & Analytics:** Capture and harness the power of data analysis to drive better outcomes for smart cities. Smart city infrastructure provides an unprecedented opportunity to improve the safety, efficiency and liveability of manmade environments.

2.3 Indara’s Supply Chains

Indara’s supply chains at a high level are set out in **Figure 2 – Indara’s Main Supply Chains**.

Figure 2 – Indara’s Main Supply Chains

MAIN FUNCTION	PRODUCT OR SERVICES ACQUIRED
Infrastructure & Engineering	<ul style="list-style-type: none"> • Indara has procured the following services for its infrastructure from suppliers located in Australia: <ul style="list-style-type: none"> – Maintenance services; – Equipment audit services (post-installation); – Portfolio health evaluation services; – Minor site improvement services; – Structure strengthening services; and – Software and services for Indara’s 24/7 Site Management Centre. <p>Indara’s engineering team only procures office services and facilities.</p>
Site Operations	<ul style="list-style-type: none"> • Indara’s site operations function is responsible for the maintenance of our towers. The team directly engages contractors to check the status of the towers. The contractors we engage in these services are highly skilled and trained.
Site Management Services	<ul style="list-style-type: none"> • We secure long-term site licences for wireless equipment on the tower sites. Indara has master leasing agreements with the major telecommunications carriers in Australia. • We also partner with building owners to obtain leases for their rooftop locations.
Deployment and SAED	<ul style="list-style-type: none"> • We do not directly procure materials for Indara’s deployment and SAED services. We engage contractors predominantly based in Australia to construct and upgrade our structures. In turn, our key contractors subcontract the work and procure building materials (in particular, steel frames and concrete) for the provision of services to us. As a result, there is indirect procurement of materials and services for this aspect of Indara’s business. • For its construction services, Indara procures towers, equipment, mounts and headframes. The actual build of the structures (such as the towers) is contracted out to different contractors who then subcontract the work to other entities. Unlike other construction services, the construction services we procure for Indara’s towers require a highly skilled workforce.
Office Services and Facilities	<ul style="list-style-type: none"> • For Indara’s group office services and facilities, we procure office supplies, IT equipment, cleaning services and professional services (e.g. legal services and accounting services) from Australian-based suppliers. Indara has worked with the majority of Indara’s key professional services providers for a long time. Indara has made a conscious decision to keep our IT services (in particular, data storage) onshore.

3. Modern Slavery Risks in Indara’s Operations and Supply Chains of any Entities We Own or Control

Australia is not immune from modern slavery, and modern slavery can occur in multiple industries and sectors. We recognise that a range of potential modern slavery risk areas may be present in the operations and supply chains of companies operating in our industry.

It was determined overall that Indara's direct operations and supply chains exhibit "Low" modern slavery risk, primarily due to the country risk associated with Indara’s domestic operations.

However, some parts of Indara's supply chain exhibit comparatively higher modern slavery risk due to higher sectoral risks (e.g. construction work, construction material, manufacturing and transport, IT procurement, IT services, and cleaning services). Indara has identified the following focus areas in Indara’s operations and supply chains, as may be seen via **Figure 3 – High-Level Modern Slavery Risks – Focus Areas**.

Please see **Section 8 – Looking Forward – Modern Slavery Compliance Roadmap** for the actions that Indara will take to mitigate the below-mentioned risks.

Figure 3 – High-Level Modern Slavery Risks – Focus Areas

FOCUS AREAS	RISK
<p>Our key contractors who are involved in procuring building materials (e.g. steel and concrete) used in our operations</p>	<ul style="list-style-type: none"> We do not directly procure materials for Indara’s deployment and SAED services. For the build of Indara’s structures, we engage contractors who are predominantly based in Australia. In turn, those key contractors subcontract the work and procure building materials (in particular, steel frames and concrete) for the provision of services to Indara. The materials may be sourced from countries carrying a higher risk of modern slavery. Additionally, the Commonwealth Guidance recognises that steel and concrete components may carry higher risks of modern slavery due to how and where they are produced. While we do not directly procure these building materials, we recognise they carry higher risks.
<p>Our construction services</p>	<ul style="list-style-type: none"> We procure specialist construction services for the actual build of Indara’s structures (such as Indara’s towers). While the construction industry is recognised as presenting higher modern slavery risks because it usually involves low-skilled, manual and temporary labour, the construction services we procure for Indara’s towers are different. The construction services for Indara’s mobile towers require a highly skilled workforce. However, we recognise that construction is known to be a higher-risk industry based on modern slavery risk indicators.
<p>Cleaning Services</p>	<ul style="list-style-type: none"> Certain services may have higher modern slavery risks because of the way they are provided. Cleaning often involves lower wages and manual labour, which is recognised as a higher-risk service. Our building management procures cleaning services for Indara’s office buildings.
<p>IT equipment</p>	<ul style="list-style-type: none"> Indara is aware that some of the IT equipment we procure for Indara’s staff to use in our offices and at home may be from countries known to carry medium to high risks of modern slavery based on the Global Slavery Index. However, we do not have significant leverage over suppliers who provide us with IT equipment.

4. Indara’s Governance Framework and Policies

Indara’s highest level of responsibility for modern slavery sits with the Indara Board of Directors (the Board), which oversees strategy, business performance, compliance, and risk management, including modern slavery. The Board has established the Audit and Risk Committee to assist in its oversight of an effective risk management framework, including as it relates to modern slavery risk management.

At an operational level, Indara’s progress on modern slavery will be driven through Health Safety Environment & Sustainability Committee.

Indara is committed to identifying the risks of modern slavery within Indara’s business and taking meaningful steps to address such risks. A formalised governance structure (Please see [Figure 4 – Modern Slavery Governance Structure](#)) is in place to oversee Modern Slavery risks and progress made to implement actions.

Figure 4 – Modern Slavery Governance Structure



The policies of particular relevance to modern slavery are our Code of Conduct, Interim Procurement Policy, Risk Management Policy and Diversity, Anti-Discrimination & Harassment Policy, which have been established to maintain integrity and confidence in Indara and safeguard the reasonable expectations of Indara's key stakeholders. Please see [Figure 5 – Relevant Board-Approved Policies](#).

Figure 5 – Relevant Board-Approved Policies

POLICY	SUMMARY	KEY PARTS
<p>Code of Conduct</p>	<ul style="list-style-type: none"> Outline rules, the standard of behaviour, ethical standards and organisational values 	<ul style="list-style-type: none"> The Code applies to everyone working for and with ATN, including contractors. Everyone must not engage in any activity that is in breach of ATN's legal or regulatory obligations or that adversely affects ATN's interests or reputation. The selection of sub-contractors and suppliers must be made using all applicable regulations and objective criteria. Any breach of this Code is considered inconsistent with Indara's values and could result in disciplinary action up to and including the termination of employment.
<p>Interim Procurement Policy</p>	<ul style="list-style-type: none"> Outlines Key Obligations with respect to activities involving the acquisition of goods, services, infrastructure and capital works either purchased or leased 	<ul style="list-style-type: none"> The Policy applies to ATN's directors, employees, and contractors. This Policy forms part of the Code of Conduct and is to be read in conjunction with the Procurement Procedures, Conflict of Interest Policy and Delegations Policy. The Interim Finance Lead must approve the appointment of all new suppliers via the supplier creation/amendment form before they are engaged to provide products or services to ATN. ATN has a zero-tolerance approach to Modern Slavery and is committed to acting ethically and with integrity. Modern slavery is a crime and violation of human rights and is defined under the Australian Modern Slavery Act 2018. The prevention, detection and reporting of Modern Slavery in all areas of ATN's business and supply chains is the responsibility of all those working for it or under its control. This should be assessed at all stages of the procurement process. It is required that modern slavery, perceived or actual, is reported at the earliest possible stage. This applies to everyone working for and with ATN, including contractors. This expectation is also extended to Indara's suppliers and the suppliers they use.
<p>Risk Management Policy</p>	<ul style="list-style-type: none"> Provides guidance regarding the management of risk to support the achievement of corporate objectives, protect staff and business assets and ensure financial sustainability 	<ul style="list-style-type: none"> Risk management is identifying, evaluating, analysing, treating, monitoring and reviewing risks. By actively identifying and managing Indara's risks, we aim to increase our effectiveness as an organisation and to provide greater certainty and confidence to Indara's Shareholders, business partners, the community and other stakeholders. The policy also communicates ATN's commitment to developing a sound risk management culture. We expect our team to apply the policy to manage risk in decision-making and performance management processes in all business activities to support the achievement of the Company's strategic, financial and operational objectives. The Board is ultimately accountable for the management of risk and ensuring that effective risk management practices are in place across ATN. In order to fulfil its risk

		<p>management responsibilities, the Board is assisted by the Audit and Risk Committee.</p> <ul style="list-style-type: none"> • ATN's approach to risk management is aligned with the international standard for risk management AS/NZS ISO 31000:2018 Risk management – Principles and guidelines (ISO 31000). • The identification and management of risk are central to delivering ATN's strategic, financial, and operating objectives. • Risk management is embedded in ATN's decision-making to ensure that all material decisions are taken from an informed position regarding risk. This informed position includes understanding the potential financial, commercial, legal, health and safety, environmental and reputational risks.
<p>Diversity, Anti-Discrimination & Harassment Policy</p>	<ul style="list-style-type: none"> • Ensures that people are treated as individuals, respected for their unique attributes and not excluded, harassed or bullied in any way 	<ul style="list-style-type: none"> • We do not tolerate discrimination and/or harassment. This policy applies to all ATN employees and contract workers as well as agents engaged in the business, visitors, suppliers and customers who visit Indara's premises and/or interact with Indara's people. This policy applies to all work-related activities, including external work-related functions outside normal working days and hours. • ATN is committed to promoting a tolerant, inclusive workplace, free from all forms of discrimination, harassment and bullying that may occur. • Everyone can anonymously contact the ATN Whistleblower program. • Indara has internal procedures for investigating and resolving complaints of discrimination and harassment. Any breach of this policy is considered inconsistent with Indara's values and could mean disciplinary action is taken which can include termination of employment.

5. Measuring the Effectiveness of Indara's Actions

At Indara, we recognise the need to have means to measure the effectiveness of our actions to combat modern slavery. Our approach to measuring the effectiveness of our actions is summarised in this Section and [Section 8 – Looking Forward – Modern Slavery Compliance Roadmap](#). We expect to fine-tune our key performance indicators as our approach to modern slavery becomes more advanced.

6. Consultation

The ATN Reporting Entities have taken a whole-of-enterprise approach to prepare this Joint Statement. Key stakeholders from the Legal, Risk and Compliance (LR&C), Finance and Internal Audit teams of each reporting entity were involved in the preparation of this Joint Statement. We provided opportunities for Indara's owned and controlled entities to provide input on the Joint Statement by circulating drafts to key stakeholders.

Telco Together Foundation – Industry Impact Hub

Telco Together Foundation is the foundation of the telecommunication sector for collectively addressing some of the most complex social challenges within the increasingly connected world. The Foundation helps Telcos understand the relevance of modern slavery to the industry and how to manage and mitigate the risk of modern slavery in their day-to-day operations and extended supply chains. Indara is working with industry peers on modern slavery through Telco Together Foundation to address modern slavery as new initiatives are released.

Established by the Telco Together Foundation, the Industry Impact Hub is where industry leaders come together to discuss and take action on collaborative approaches to some of the most complex social challenges confronting our communities. The Industry Impact Hub;

- Creates projects that build on the industry's strengths of technology, reach and resources.
- Identifies approaches that benefit from industry-wide involvement and can be scaled to support the wider community.
- Works with members to deliver tangible and measurable outcomes.
- Acts as a point of engagement between roundtable members and key stakeholders within the industry and other sectors, including the Government.

Indara will continue to develop our reporting on modern slavery through the Foundation and Impact Hub consultation processes.

7. Any Other Relevant Information

NSW Modern Slavery

As Indara is a supplier for entities with reporting obligations under the NSW Modern Slavery Regime, Indara intends to familiarise itself with the NSW Regime in FY22-23. If required, Indara will add items to its compliance roadmap to support its customers that are required to report under the NSW Regime.

Response to COVID-19

Indara improved COVID-19 protocols and well-being procedures established during the previous reporting period. In the reporting period, we focused on effective supplier governance to ensure Indara does not suffer severe impacts that may affect the continuity and quality of Indara's services.

8. Looking Forward - Modern Slavery Compliance Roadmap

Indara will continue to review and refine our modern slavery processes, procedures and policies and implement new measures in line with our modern slavery compliance roadmap (Please see [Figure 6 – Modern Slavery Compliance Roadmap](#)). Indara has an ongoing project to review all policies and procedures by the end of 2022.

Figure 6 – Modern Slavery Compliance Roadmap

ACTION	DESCRIPTION
<p>Procurement Processes</p>	<p>During the Second Reporting Period, we will review and update Indara’s existing procurement processes to include modern slavery questions in the pre-screening and onboarding processes for suppliers in high-risk industries. As part of the Procurement Policy, we will require to agree to comply with Indara's modern slavery policy.</p> <p>We will create a list of preferred suppliers assessed for modern slavery risk so that Indara can engage suppliers from this list, knowing they have been approved. This list will be reviewed periodically.</p>
<p>Measuring Effectiveness</p>	<p>An internal mechanism will be created in the Second Reporting Period to measure the effectiveness of our actions to mitigate Modern Slavery Risks. Some examples of the key criteria we will use to assess our effectiveness may be seen below;</p> <ul style="list-style-type: none"> • The percentage of active contracts incorporating modern slavery risk mitigates such as counterparty obligations regarding controls, monitoring and reporting to Indara • The percentage of the staff who have completed our modern slavery training module (Please see the Training section on this table) • The number of modern slavery-related allegations reported via our modern slavery communication channels and whether any cases were substantiated • Feedback from Indara’s staff, suppliers, service providers and the other stakeholders
<p>Supplier Survey</p>	<p>We will issue supplier surveys in the Second Reporting Period for suppliers we identify as being at higher risk. The supplier survey template will be reviewed and updated to make the survey easy and convenient both for suppliers and for further analysis.</p> <p>The supplier surveys will cover a number of topics, including:</p> <ul style="list-style-type: none"> • awareness of modern slavery issues; • the location of suppliers and the nature of goods or services; • nature of the workforce, including whether employees are permanent, casual or contractors and whether employment agreements are in place; • specific labour risks such as child labour and forced labour; • risk identification and mitigation processes such as whistleblowing policies, policies and procedures and agreements with suppliers; and • policies and procedures in place to respond to allegations of modern slavery.
<p>Anti-Modern Slavery Policy</p>	<p>In Indara’s Second Reporting Period, we will finalise the internal Anti-Modern Slavery Policy that informs staff that responding to modern slavery risks is a priority for Indara.</p> <p>This policy will:</p> <ul style="list-style-type: none"> • explain in general terms the concepts of modern slavery and human trafficking, • set out the group's zero-tolerance approach for modern slavery within Indara and its supply chains,

	<ul style="list-style-type: none"> • set out internal reporting obligations and potential indicators of modern slavery that employees of Indara should be aware of. <p>This and other key policies and procedures will be reviewed periodically.</p>
Whistleblower Policy	<p>We are finalising Indara’s Whistleblower Policy for staff and third parties to report concerns (which could be modern slavery risks or incidents). Under this policy, we will have a hotline, drop-box, email address, fax and postal address, and the policy will be displayed publicly. We recognise the importance of staff members knowing how to respond appropriately to prevent or mitigate harm if a modern slavery incident or risk is found. Contractors and suppliers will have access to the whistleblower communication channels. The policy will also encompass the investigation process of the allegations received.</p>
Contractual Controls	<p>The standard supplier contracts will be reviewed to include all relevant modern slavery clauses.</p>
Training	<p>During Indara’s Second Reporting Period, we will build a training module to increase our employees' knowledge and experience. The suppliers' training needs will also be considered as a part of this process.</p>
Supplier Code of Conduct	<p>Indara will implement an external-facing Supplier Code of Conduct to complement the internal Anti-Modern Slavery Policy.</p> <p>The expectations of the suppliers will be codified in respect of modern slavery. Supplier Code of Conduct will set out the minimum standards we expect from Indara’s suppliers and form part of our standard purchasing terms.</p>



Appendix 1 - ATN Reporting Entities – from 1 July 2021 to 20 March 2022

This Joint Statement covers the entities in the table below for the period of 1 July 2021 to 20 March 2022.

No.	Name of Indara Reporting Entity	ABN/ACN
1	Australia Tower Network Pty Limited	ACN 643 875 165

Appendix 2 - ATN Reporting Entities – from 21 March 2022 to 8 May 2022

This Joint Statement covers the entities in this table for the period of **21 March 2022 to 8 May 2022**.

No.	Name of Indara Reporting Entity	ABN/ACN
1	Australia Tower Network Pty Limited	ACN 643 875 165
2	Australia Tower Network Holdings Pty Ltd	ACN 658 191 738

Appendix 3 - ATN Reporting Entities – from 9 May 2022 to 30 June 2022

This Joint Statement covers the entities in this table for the period of **9 May 2022 to 30 June 2022**.

No.	Name of Indara Reporting Entity	ABN/ACN
1	Australia Tower Network Pty Limited	ACN 643 875 165
2	Australia Tower Network Holdings Pty Ltd	ACN 658 191 738
3	Axicom Asset HoldCo Pty Ltd	ACN 605 778 514
4	Axicom Asset Pty Ltd	ACN 605 786 490
5	Axicom Hold Trust	ABN 42 508 575 162
6	Axicom Asset Trust	ABN 73 907 540 472
7	Axicom Finance Pty Ltd	ACN 605 452 435
8	Axicom HoldCo Pty Ltd	ACN 605 798 829
9	Axicom BidCo Pty Ltd	ACN 605 799 899
10	Structel Pty Ltd	ACN 064 274 835
11	Axicom Inbuilding Solutions Pty Ltd	ACN 605 800 511
12	Axicom Holdings Pty Ltd	ACN 086 370 274
13	Axicom Properties Ltd	ACN 116 320 515
14	Axicom Pty Ltd	ACN 090 873 019
15	Axicom Services Pty Ltd	ACN 600 590 878
16	Axicom Administration Pty Ltd	ACN 151 461 817

Appendix 4 – Mandatory Criteria - Checklist

The table below indicates aspects of Indara’s statement which relate specifically to the mandatory criteria for modern slavery statements in the Modern Slavery Act.

Mandatory Criteria	Reference
a) Identify the reporting entity.	<ul style="list-style-type: none"> About this Statement (page 1)
b) Describe the reporting entity's structure, operations and supply chains.	<ul style="list-style-type: none"> Who Indara is (page 2) Indara’s Structure, Operations and Supply Chains (page 3) Appendix 1,2,3 (page 14, 15)
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<ul style="list-style-type: none"> Modern Slavery Risks in Indara’s Operations and Supply Chains of any Entities We Own or Control (page 7)
d) 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.	<ul style="list-style-type: none"> Indara’s Governance Framework and Policies (page 8)
e) Describe how the reporting entity assesses the effectiveness of these actions.	<ul style="list-style-type: none"> Measuring the Effectiveness of our Actions (page 10)
f) 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).	<ul style="list-style-type: none"> Consultation (page 10)
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	<ul style="list-style-type: none"> Indara Culture & Values (page 3) Any Other Relevant Information (page 11) Looking Forward – Modern Slavery Compliance Roadmap (page 11)