

# Modern Slavery Statement

---







**Superloop Limited** and its subsidiaries (Superloop) are jointly committed to implementing policies and procedures that meet our moral and ethical obligations to participate in the global collective action to end modern slavery.

In preparing this joint statement, Superloop has examined and engaged with each subsidiary within the group to assess and address the risk of modern slavery. This task was made easier as most employees functionally and physically work together, even if they are notionally employed by different subsidiaries.



# A message from our CEO

Valuing human rights and the ethical considerations of all people connected to our business is not something I take lightly. These are commitments that Superloop incorporates into all aspects of our business, not because we have to, but rather because we know it is the right thing to do. As such, our commitment to addressing instances of human rights risks and violations wherever we encounter it is unwavering.



Encoded in Superloop's core values are ideas that encapsulate who we are, what we do, and how we go about doing business. Among these is the principle of accountability. This core belief ensures that we fully take onboard our responsibility for the safety and welfare of all people who come into contact with our company, from our business partners and subsidiaries, to our employees and those working in our supply chain.

To address these issues, Superloop has instituted a robust governance framework that is dedicated to the highest levels of integrity and ethical standards, including our commitment to human rights.

As Superloop continues to grow and develop, so too does the complexity and size of our supply chain. This expansion has the potential to increase our touchpoints with non-OECD nations, so remaining vigilant in the fight against modern slavery is an ongoing commitment that I take with the utmost of seriousness. Protecting the human rights of those we employ and work with remains a key priority, a moral obligation and central to Superloop's values and identity as a leading telecommunications provider.

This, our first Modern Statement was approved by the Superloop Limited Board on 19 February 2021. If you have any feedback or questions regarding this statement, please direct them to [investor@superloop.com](mailto:investor@superloop.com)

A handwritten signature in black ink, appearing to read 'Paul Tyler', written in a cursive style.

**Paul Tyler**

Chief Executive Officer

29 April 2021



## Our business

Superloop is an ASX-listed independent provider of connectivity services that designs, constructs and operates networks throughout the metro Asia Pacific region.

Superloop consists of several telecommunications companies under the listed parent company Superloop Limited.

With extensive carrier-grade metro fibre networks in these markets and fixed wireless networks in Australia, Superloop delivers high-performance wholesale and retail connectivity solutions.

Superloop's total direct workforce is over 300, with employment centres in Australia, Singapore, and Hong Kong. We also have 'virtual co-worker' arrangements with contractors based in Sri Lanka and the Philippines.





## Be collaborative

We embrace diversity and the contribution every one of us can make to get the job done. We create environments that are founded on effective communication, collaboration and empathy. We recognise that we collectively make up the culture we work in every day and that we are only as strong as our weakest contributor.



## Be accountable

We care about what we do. We empower each person to do their jobs, but we hold ourselves accountable particularly if we get it wrong. We understand that there's no one in the passenger seat every decision has a consequence, and it's our collective and individual responsibility to get stuff done, properly and with commitment.



## Be excellent

We act on well thought out direction and purpose. We adapt as situations require and use teamwork and initiative to do so. We measure our outcomes and we never settle for good when we can be excellent.



## Always improve

We champion change as we want to better ourselves and the business. We are all about continuous learning, breaking walls, and being better at what we do - both individually and as a team. We have small business agility and we thrive on being the challenger. We give and take on feedback because we aspire to be awesome.

## Our values

At Superloop we have four core values which reflect who we are and what we expect of our people and business partners.

Overlaying our values is our Code of Conduct, which helps us ensure we adopt a consistently ethical approach to compliance issues across our operations, including how we address the risk of modern slavery.



## Our governance framework

At Superloop we recognise that excellence in corporate governance, transparency, and accountability are essential elements in the long-term performance and sustainability of our business in meeting our obligations to our shareholders and stakeholders.

Superloop is committed to operating in a socially responsible and ethical manner. Superloop aims to meet the highest standards of integrity in a clear and transparent manner. These are standards beyond our legislative requirements and reflect the values we detail in this document.

To learn more about our governance processes, please see our Corporate Governance Statement, available at our website at [superloop.com](https://www.superloop.com)





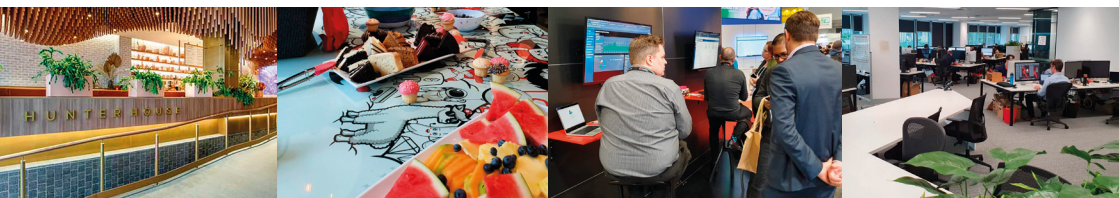
## Our supply chain

As is common in the telecommunications industry, the vast majority of our suppliers are in OECD countries, with a small number in non-OECD countries but where they represent a very sophisticated segment of that country's economy, such that the risks of Modern Slavery are still very low.

Our largest category of spend was on information and communications technology (ICT). This category includes electrical equipment, network capacity and software development. Most of these goods are manufactured and sourced by our suppliers, from countries including China, Vietnam, and Thailand. However, we generally deal with an Australian based subsidiary and as such, the majority of our spend is within Australia. Most of our network is in OECD countries and is maintained by employees or contractors in accordance with local laws.

Our second largest category of spend relates to the construction and maintenance of the physical infrastructure of our telecommunications network. This activity is conducted directly or by subcontractors to our specifications. Irrespective of the delivery method, most goods and services are sourced from Australian suppliers.

The remaining procurement spend is on non-core activities, such as professional services and travel. Included in this expenditure is the use of a small number of overseas 'virtual co-workers' based in Sri Lanka and the Philippines. In these arrangements, we pay a service organisation to provide us with specialist staff on a contractual basis that is consistent with local laws and standards in each country.

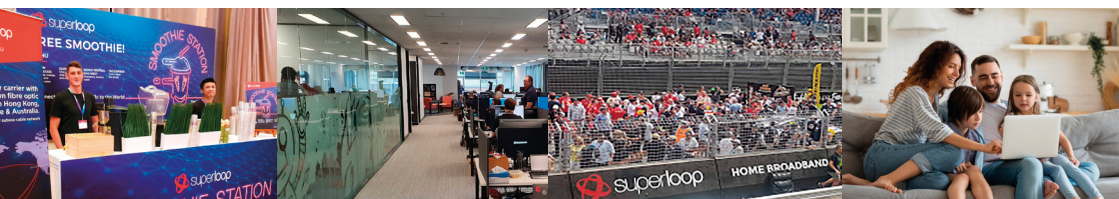


# Our supply chain

We believe the highest potential for modern slavery in our supply chain is related to the following areas:

1. **The electronic goods we use to support our networks and customers, in areas such as:**
  - **Sourcing raw materials**  
many of the components used in electrical goods may come from developing economies and the work practices and remuneration of these workers could amount to modern slavery;
  - **Assembly of electronic goods**  
while these goods are assembled largely in countries that have either signed and/or ratified the 'International Covenant on Civil and Political Rights', the potential remains for modern slavery; and
  - **'E-waste'**  
while the subject of 'E-Waste' being shipped to developing economies has received significant attention and may also constitute a violation of the Basel Convention, it still continues around the world. Recycling of these waste streams is another potential area for modern slavery.
2. **The small number of virtual co-workers we engage through third party service agencies.**

We have engaged with our third party service agencies to confirm that they are not aware of any modern slavery in their supply chains, that they comply with all relevant local laws, and that they have not been investigated or penalised by a relevant employment law regulator.



## Our Commitment

Based on the above assessment of the scale and geography of our operations and supply chain, we believe we are a relatively low risk of directly causing or contributing to the issue of modern slavery. However, to address the risk that we may indirectly and unwittingly be contributing via the suppliers we purchase goods and services from, particularly in non-OECD countries, our ongoing focus will be to understand our supply chain better, use our influence as a purchaser to encourage suppliers to improve employment practices to the best of our ability, and actively avoid any company we suspect of involvement in modern slavery.

### We plan to:

- Progressively add a standard Modern Slavery contractual clause to new contracts for suppliers, to warrant to us that there is no modern slavery in their supply chains;
- Develop and enforce a supplier code of conduct which would consider issues such as modern slavery;
- Advocate for collective action around the issue of modern slavery through our membership of industry bodies;
- Regularly conduct audits with each of our agents providing virtual co-worker services, as to their compliance with local employment laws and whether the payments they provide their workers compare no less favourably than benchmarked norms for those occupations in those countries; and
- Conduct an investigation to understand what happens to our 'E-waste' to check that processing companies are taking appropriate steps to minimise the risk of modern slavery.







For any queries about Superloop's  
Modern Slavery reporting, please  
contact us at [risk@superloop.com](mailto:risk@superloop.com)