

sumo

Sumo Australia Limited
Modern Slavery Statement 2022



Executive Summary

Sumo Australia Limited (**Sumo**), together with its controlled entities (the **Sumo Group**) is an Australian-owned and operated utilities retailer based in Melbourne. Given its turnover of more than \$100 million during the Reporting Period, Sumo has an obligation to report under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

The operations of the Sumo Group are fully integrated, sharing governance, executive and management teams and employees, office space, and some supply contracts. It is therefore appropriate to assess operations and supply chains for the Sumo Group as a whole.

Sumo has assessed the risk of modern slavery practices occurring in its internal operations as remote, given the location, recruitment and working conditions of its Melbourne-based staff.

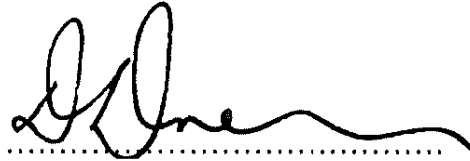
Sumo has assessed the risk of modern slavery across its suppliers. Although the overall risk of modern slavery in our supply chain is low, our assessment has identified suppliers that present higher relative risk, and we are managing these risks accordingly.

Sumo continues to manage the risk of modern slavery through education and learning, workplace policies and processes, its assessment of and engagement with third-party suppliers, and the progressive roll-out of its Supplier Code of Conduct.

This Statement has been developed through cooperation between different functional teams that are shared across the Sumo Group.

Sumo will continue to assess best practice in mitigating modern slavery risks.

This statement was approved by the Board of Sumo Australia Limited.



Dominic Drenen, Managing Director

This Statement

Sumo Australia Limited provides this Modern Slavery Statement (**Statement**) as required under the Modern Slavery Act for the reporting period 1 July 2021 to 30 June 2022 (**Reporting Period**).

About Sumo

Sumo's corporate structure

Sumo is a public unlisted company. It has a number of wholly-owned subsidiary companies which together comprise the Sumo Group. These entities share staff, facilities, and operating structure including governance and relevant policies. None of these subsidiaries on their own had consolidated revenues above \$100 million in the Reporting Period. All Sumo Group entities are registered in Australia.

Sumo's registered office is located at 'HWT Tower', Level 17, 40 City Road, Southbank, VIC 3006.

Sumo's operations

Sumo is an Australian-owned and operated utilities retailer based in Melbourne, Australia.

Since its launch in 2015, Sumo's operations have grown to include the retailing of energy and telecommunications services to residential and small business customers in Victoria, New South Wales, Queensland and South Australia. As at 30 June 2022, Sumo had approximately 106,000 electricity, gas and telecommunications customer accounts across Victoria, NSW, Qld and SA.

Sumo does not own or operate any electricity generation or gas production or storage assets, nor any telecommunications infrastructure. Instead, it focusses on providing excellent service to residential and small business customers, and driving down

its cost base so that it can continue to offer competitive prices.

For telecommunications services, Sumo partners with wholesalers to offer the services to consumers.

Sumo manages its own contact centre, operations and sales teams in South Melbourne. It had 64 employees as at 30 June 2022, all working out of the Melbourne office or from home, mostly in the Melbourne area.

Sumo's supply chains

During the Reporting Period, Sumo made payments to 131 suppliers. Sumo's supply chain includes:

- the wholesale supply of electricity, gas and telecommunications services;
- energy distribution and metering services;
- sales and marketing services;
- billing and back-office services;
- telco customer support services;
- payment channels;
- IT software and hardware services;
- professional services; and
- office lease.

The vast majority of Sumo's supply spend is to Australian companies, or to companies with operations in Australia and subject to Australian laws.



Risks of modern slavery practices in Sumo's operations and supply chains

Introduction

The term "modern slavery" is defined in the Modern Slavery Act to include eight specific types of serious exploitation: trafficking in persons; slavery; servitude, forced marriage, forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. As detailed in the *Guidance for Reporting Entities*, such practices have the consequence of a worker not being able to refuse or cease work because of coercion, threats or deception, and the worker may also be deprived of personal freedom.

Framework for assessing risks of modern slavery

Our review of public literature, including Modern Slavery Statements published by other entities, has identified four modern slavery key risk indicators:

- vulnerable populations – groups of people that are more likely to be exposed to harm;
- high risk sectors – these include, relevantly, supply chains for the supply of electronic goods and cleaning and maintenance services;
- high risk business models – such as a reliance on third-party labour hire, which reduces visibility as to recruitment practices; and
- high risk geographies – countries or regions known to have higher human rights risks.

Sumo uses these risk factors in considering risks of modern slavery in its operations and supply chains.

Assessment of risks of modern slavery in Sumo's internal operations

Sumo's operations are conducted from and at Sumo's headquarters in South Melbourne, Victoria. As at 30 June 2022, Sumo had 64 employees – all recruited directly by Sumo, all with appropriate rights to work in Australia, and all in roles which require employees to be fully proficient in the English language.

Sumo's employees whose remuneration is below the relevant high income threshold amount have entitlements under the Electrical Power Industry Award, as varied by Individual Flexibility Arrangements, and are paid at rates that exceed the Electrical Power Industry Award rates of pay.

Sumo has a number of workplace policies and processes which are shared with all employees. These include a Code of Conduct, a Grievances and Complaints Policy and a Whistleblower Policy, encouraging employees to notify any identified non-compliance or inappropriate practices within Sumo. Sumo has not received any complaints or grievances that may indicate possible modern slavery practices.

Sumo considers that the risk of modern slavery occurring in its internal operations is remote.

Assessment of risks of modern slavery practices in Sumo's supply chain

Sumo reviews the list of suppliers to the Sumo Group each year for modern slavery risks, and has done so again during the Reporting Period. The assessment for each supplier is informed by the key risk factors outlined above and Sumo's relative spend.

Sumo made payments to 131 suppliers during the period. The spend with each supplier varied from a few hundred dollars to many millions of dollars.



Electricity and gas sold by Sumo is generated or sourced in Australia. Sumo's wholesale energy and distribution suppliers, which make up 89% of Sumo's supplier costs, are major companies with operations in Australia. The companies and people who work to produce this energy as employees or contractors are subject to Australian laws, including laws relating to employment and occupational health and safety.

Sumo's procurement of third-party IT systems and customer support services uses labour from geographies outside Australia, and represents a relatively higher risk of modern slavery.

Other risks identified in Sumo's supply chain include the sourcing of electronic goods such as laptops and computer equipment (given manufacturing often takes place in less developed countries), and office cleaning services (given the higher-risk nature of the sector).

Actions taken by Sumo to assess and address modern slavery risks

Managing modern slavery in Sumo's operations – learning and education

Building internal knowledge and awareness of modern slavery issues is a primary mechanism Sumo uses for improving modern slavery risk identification and mitigation in its operations and supply chain.

Sumo delivered modern slavery training materials to all staff in a position to influence risks of modern slavery in its operations and supply chain.

Managing modern slavery in Sumo's operations – hiring and workplace conditions

Sumo manages its own recruitment, and the labour used in its operations are employees

who are subject to employment terms that are equivalent to, or more favourable than, the applicable industry Award.

Sumo's workplace policies and processes, including its Code of Conduct, Grievances and Complaints Policy and Whistleblower Policy, are shared with employees and training is provided.

As noted above, Sumo has not received any complaints or grievances that may indicate possible modern slavery practices.

Managing modern slavery in Sumo's supply chain – supplier due diligence

As noted above, Sumo has reviewed its list of suppliers to assess the risks of modern slavery practices in its supply chain.

Sumo has a process of engaging with those of its suppliers that present a higher risk of modern slavery, by requesting them to complete and return a modern slavery risk questionnaire. The purpose of the questionnaire is to understand the supplier's operations and supply chain better.

Sumo has identified two suppliers that present a higher risk of modern slavery due to their use of offshore labour. Sumo has engaged with these suppliers using its modern slavery risk questionnaire and has not identified any matters of concern.

Code of Conduct for Suppliers

Sumo has implemented a Supplier Code of Conduct (see <https://www2.sumo.com.au/sumo-supplier-code-of-conduct/>).

Sumo has incorporated into its template supplier contracts an obligation on the supplier to use best endeavours to comply with Sumo's Supplier Code of Conduct.



How Sumo assesses the effectiveness of actions to assess and address modern slavery risk

Sumo monitors and will act on any complaints or grievances that may indicate a risk of modern slavery. No modern slavery practices were detected during the Relevant Period.

Sumo undertook a review of the processes in place during the Relevant Period to assess and manage modern slavery risks. Following this review it determined that:

- Sumo's hiring practices and workplace conditions remained appropriate for managing modern slavery risks;
- it would continue to build awareness of modern slavery risks to relevant employees by sharing training materials, and encouraging engagement with suppliers regarding modern slavery risks;
- the reach of Sumo's Supplier Code of Conduct was limited, with only a small proportion of Sumo's suppliers bound to comply with it. Sumo will aim to incorporate the Supplier Code of Conduct into key new supply contracts.

Sumo will continue to adopt an approach of continuous learning and improvement to understand the risk of modern slavery in its operations.

Process of consultation between Sumo Group Entities

The operations of the Sumo Group entities are fully integrated. The entities have common directors and share the same executive and management teams and employees, as well as governance structures and policies. Only Sumo Australia Limited met the revenue threshold in the Relevant Period and therefore has a reporting obligation under the Modern Slavery Act.

The process for developing and executing the response to the Modern Slavery Act, and development of the Statement, has been a cross-disciplinary project led by the Legal team.

The Statement has been approved by the Sumo Australia Limited Board of Directors.

Other relevant information

Sumo does not have any further relevant information at this time.

