



Modern Slavery Statement 2022



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About this statement

This modern slavery statement (**statement**) is a joint statement prepared pursuant to the *Modern Slavery Act 2018* (Cth) (**MSA**) covering TPG Telecom Limited (ABN 76 096 304 620) (the ultimate parent company in the TPG Telecom group of companies (the **TPG Telecom Group**)) and the other reporting entities within the TPG Telecom Group listed in *Appendix 1* (together referred to throughout this statement as **TPG Telecom, we, us, our** or **the reporting entities**). This is our 2022 statement for the financial year ended 31 December 2022 (the **reporting period**). Information provided in this statement is correct as at 31 December 2022.

Consultation with the reporting entities

This statement was prepared by the TPG Telecom Human Rights and Modern Slavery Committee, which includes senior managers from Risk, Compliance, Sustainability, People Experience, Procurement and Legal. For information on the governance framework and review process refer to page 10 of this statement.

This statement was developed by the Human Rights and Modern Slavery Committee through engagement and consultation with all business units within TPG Telecom. The business units cover the operations of all TPG Telecom reporting entities. The reporting entities' operations all fall within the organisation structure, governance framework and executive management responsibilities of TPG Telecom. This statement has been approved by TPG Telecom Limited's Board of Directors, which is the principal governing body of TPG Telecom, on behalf of the reporting entities.

Appendix 2 details how our statement has complied with the mandatory reporting criteria for statements, as set out in the MSA.



Acknowledgement of Country

We acknowledge the Traditional Custodians of Country throughout Australia and the lands on which we, and our communities live, work and connect. We pay our respects to their Elders, past, present, and emerging.

2022 Highlights



Developed our **Modern Slavery Governance Framework** to formalise a structured approach to combatting modern slavery



Launched **Modern Slavery e-learning** module for all employees, to improve awareness of key issues relevant to our industry



Undertook a **risk assessment** across our operations to better understand potential risks relating to modern slavery



Developed a **Human Rights Policy** to formalise our commitment and respect for Human Rights



Continued **rationalisation of suppliers** to improve visibility over our supply chain



Message from the CEO



Iñaki Berroeta, CEO & Managing Director

At TPG Telecom, our purpose is to build meaningful relationships and support vibrant, connected communities. Our purpose drives us to conduct our business in an ethical and socially responsible manner so we can positively impact our people, customers, suppliers and communities every day.

We support human rights consistent with the Universal Declaration of Human Rights. We respect and reflect those rights in the way we conduct our operations and stand with local and international efforts to combat modern slavery and look for ways to support and promote those efforts.

This year's Modern Slavery Statement builds on the capability we established in previous years. In 2022, we refreshed our Modern Slavery Governance Framework across its key pillars of leadership, risk management, capability, performance and collaboration. This will set strong foundations for how we progress our efforts for managing potential modern slavery risks in our operations and the broader industry. To improve our performance, we have formalised and started to track a number of key performance indicators to assess the effectiveness of our modern slavery program and actions.

We recognise modern slavery is an area for continuous learning and improvement. This year we conducted a group-wide risk assessment to identify areas within our operations at higher risk of modern slavery. The assessment increased awareness and helped create sensible action plans. We also launched training for all our employees to raise awareness of modern slavery and particularly where the Telecommunications industry is susceptible.

We have continued to work on rationalisation of our supplier base and recognise this as an area of continued focus. We are working on improving due diligence and analysis of risks within our complex supply chain.

Through industry collaboration and our own efforts to build internal capability and knowledge, we are committed to taking steps to bring about positive change to address modern slavery.

Iñaki Berroeta

Chief Executive Officer and Managing Director,
TPG Telecom Limited

June 2023

About TPG Telecom

Our Structure

TPG Telecom Limited, formerly named Vodafone Hutchison Australia Limited, was listed on the Australian Securities Exchange (ASX) on 30 June 2020. On 13 July 2020, this newly listed company merged with TPG Corporation Limited, formerly named TPG Telecom Limited, to bring together the resources of two of Australia's largest telecommunications companies, creating a leading challenger full-service telecommunications provider.

Post-merger TPG Telecom Limited is the ultimate parent company in the TPG Telecom Group and the immediate parent of TPG Corporation Limited. TPG Corporation Limited, a reporting entity for the purposes of the MSA, is the holding company of the balance of TPG Telecom Group's reporting entities under the MSA.

Our Purpose

As the second largest telecommunications company listed on the ASX, we have a strong challenger spirit and a commitment to deliver the best services and products to our customers. We are driving competition and choice for businesses and consumers across Australia.

We aim to do business in a way which responds to the needs and expectations of all our stakeholders – including our customers, employees, shareholders, regulators, and our wider society. It's why **our purpose is to build meaningful relationships and support vibrant, connected communities.**

More information about the TPG Telecom Group, including our structure, purpose and sustainability strategy is available on our website: www.tpgtelecom.com.au

Our Values

Our four values guide how we think and behave, what we prioritise, and the experiences we create for our customers and communities every day.



Stand together

Together we are unstoppable.



Own it

We step up and own what we do.



Simple's better

We challenge ourselves to find a simpler, fresher way.



Boldly go

We are hungry, curious and brave.

Our operations

Our Brands

We are home to some of Australia's most-loved mobile and internet brands including Vodafone, TPG, iiNet, AAPT, Internode, Lebara and felix.



Our services

We provide services directly to end users such as Consumers, Enterprise and Government customers. We also provide wholesale services to other service providers, network providers, content providers and several mobile virtual network operators.

Our mobile network covers over 23 million Australians with a leading network comprising more than 5,700 sites. Our 5G network covers 95 percent of the population in 12 of Australia's biggest cities and centres, meaning our 5G network reaches two in three Australians with over 2,000 5G sites. We have approximately 27,000 km of metropolitan and InterCapital fibre network in Australia and a 7,000 km international subsea cable system connecting Australia to major hubs in North America and Asia.

We use wholesale network services of third parties such as the National Broadband Network (NBN) and we share and lease certain mobile tower infrastructure with other operators.

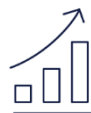
We have intercarrier relationships with domestic and international network partners to ensure interoperability of mobile services globally, including over 500 relationships with international roaming partners.

We operate a contact centre in the Philippines and we are also supported by outsourced contact centres in India, South Africa and Fiji. We own and manage retail stores across Australia (approximately 100 company-owned stores) and are supported by over 250 stores run by approximately 100 Dealer partners.

TPG at a Glance



Australia's second largest fixed voice and data network



\$2,135m
earnings before interest, tax, depreciation and amortisation (EBITDA)



Approx. 34,000km+
Metropolitan, inter-capital and subsea cable systems



Fibre-to-the-Basement
network in major capital cities



Approx. 7.5 million
Mobile and Fixed broadband subscribers



5G mobile network
reaches 95% of the population in 12 of Australia's largest cities & regions



Approx. 6,000
employees

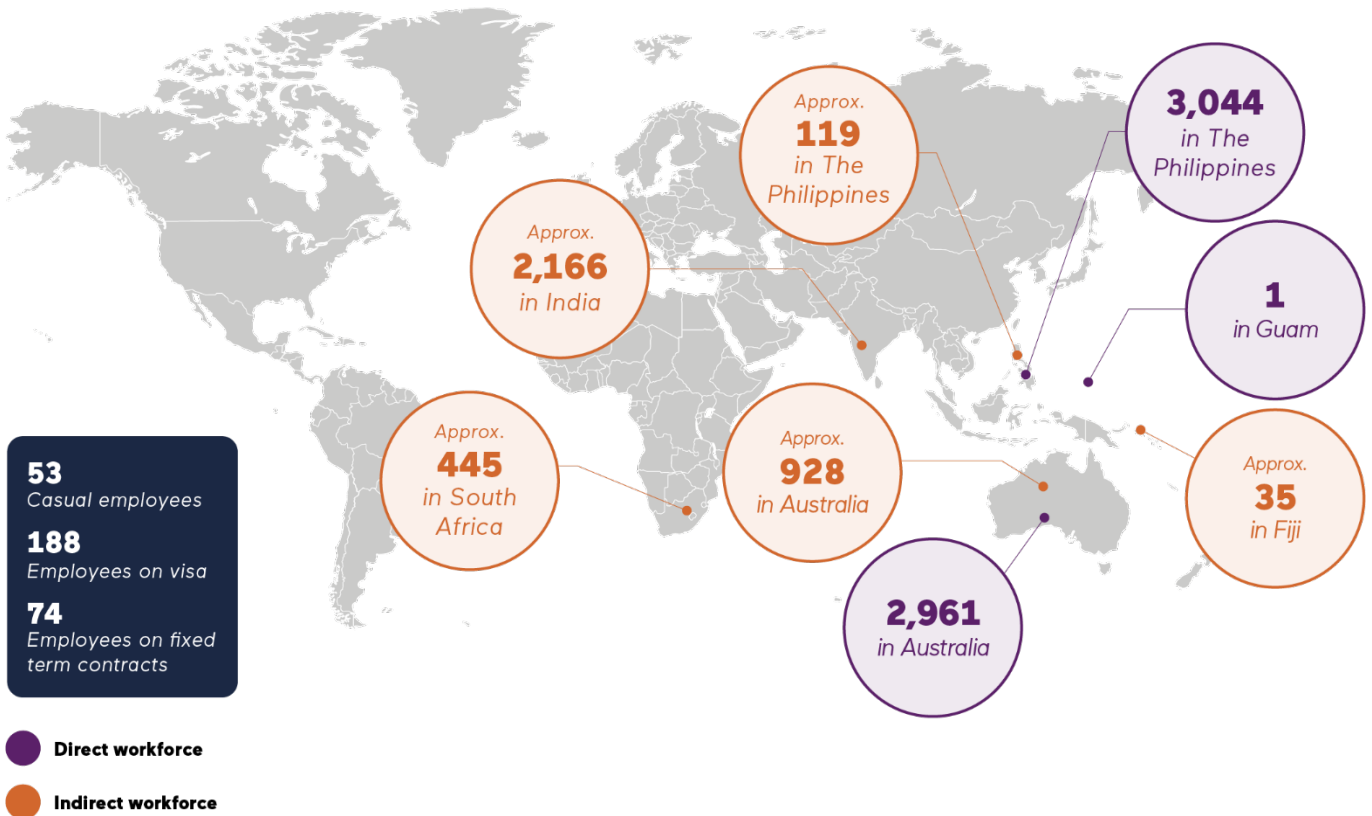
Our Workforce

At TPG Telecom, our culture is known as the 'Spirit of TPG', which is brought to life through living our purpose and values. We continually invest in developing our employees' capabilities and skills and in making TPG Telecom a great place for our people to work and grow together.

Our latest employee engagement survey results (Survey undertaken in October 2022) told us our people feel heard, informed and cared for by their leaders, and passionate about their work and how it contributes to our organisational goals. During 2022 we were recognised with the Human Resources Director (HRD) 5-Star Employer of Choice award.

TPG Telecom has 6,006 employees based in Australia, Guam and the Philippines (As at 31 December 2022). Our direct workforce includes employees based in corporate offices, contact centres, retail stores and field-based employees working in network and fibre operations throughout Australia. In addition, we have an indirect workforce based in India, Fiji, Philippines, and South Africa that provide customer service, shared services, network operations and technology support.

While the majority of our workforce are permanent employees, we do employ a small number of staff on a casual basis, on fixed-term contracts and through working visas.



Our supply chain

TPG Telecom procures wide-ranging goods and services to operate our fixed and mobile infrastructure and service our customers.

We have a large supplier base which ranges from strategic partnerships with multinational firms to relationships with small and medium enterprises. The services we procure are mainly based in Australia, India and South Africa while goods that we purchase are manufactured by our direct and indirect supply chain based in Australia and overseas.

We have approximately 1,200 active vendors. While 90% of our procurement spend is with vendors based in Australia, we acknowledge our direct suppliers often have offshore manufacturing operations and their own tiers of domestic and international suppliers. This results in a deep, complex supply chain that comprises many tiers.

The majority of our procurement spend is allocated to the following categories of goods and services:

- devices and modems, including mobile phones, tablets, routers, and modems which are sourced from large multinational companies and on-sold to our customers;
- network technology, equipment and construction, including goods and services procured to build and operate the fixed and mobile network infrastructure; and
- professional services, largely relating to spend on outsourcing services, advisory support and marketing.



Understanding and managing modern slavery risks

Governance

The highest level of responsibility for modern slavery sits with the TPG Telecom Board of Directors (the **Board**), which has oversight of strategy, business performance, compliance and risk management. The Board has established the Audit and Risk Committee (the **ARC**) to assist in its oversight of an effective risk management framework, including modern slavery risk management.

At an operational level, our progress on modern slavery has been driven through a dedicated Human Rights and Modern Slavery Committee (the **Committee**), led by the General Manager Risk and Audit with representation from Sustainability, People Experience, Procurement, Enterprise Risk, Legal and Compliance teams.

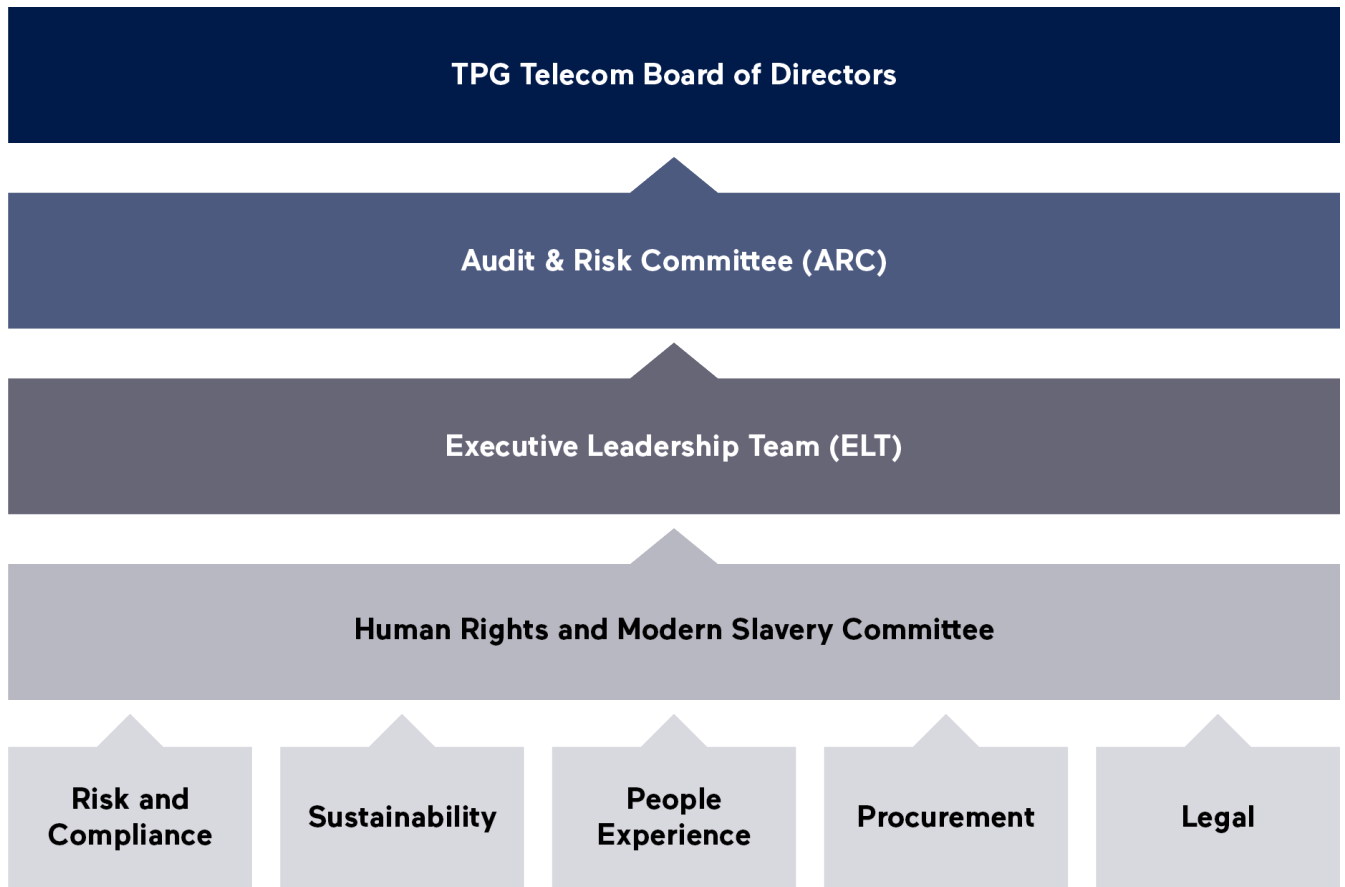
The Committee is responsible for ensuring TPG Telecom achieves its long-term plan for combatting modern slavery and implementing the required initiatives across TPG Telecom operations in consultation with the various business units. The performance of this working group is overseen by the Executive Leadership Team (ELT).

In 2022, we developed a Modern Slavery Governance Framework (the **Framework**) to formalise a structured approach to identifying, assessing, and addressing modern slavery risk in our business operations and supply chains.

The Committee's responsibilities include designing and tracking relevant Key Performance Indicators (**KPIs**) to ensure implementation of the Framework and progress of initiatives to continuously improve our management of modern slavery risks. The KPIs are outlined in the section on 'Assessing Effectiveness' on page 20.



TPG Telecom is committed to identifying the risks of modern slavery within our business and taking meaningful steps to address such risks. A formalised governance structure and framework is in place to oversee modern slavery risk management and progress made to implement actions.



Modern Slavery Governance Framework

The five pillars are foundational to measure and report on the effectiveness of our modern slavery response and progress.



Our Approach to Risk Management

The UN Guiding Principles on Business and Human Rights (UNGPs), implement the 'Protect, Respect and Remedy' framework¹. It requires businesses to not only avoid causing or contributing to adverse human rights impact' and seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts'.

At TPG Telecom, we have continued to strengthen our approach to modern slavery risk management. In 2022, we leveraged the UNGPs in conjunction with the TPG Telecom Risk Management policy to undertake a modern slavery risk assessment across our business operations.

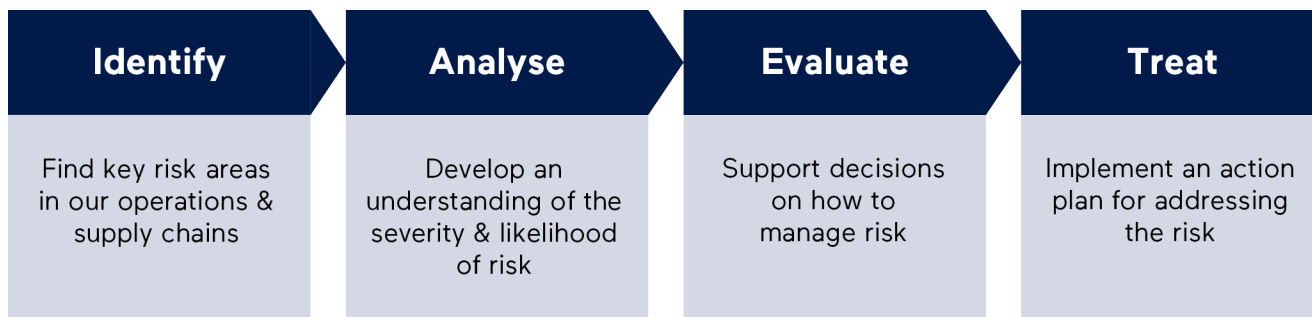
In line with the UNGPs requirements, our risk management process seeks to assess risks to people rather than to identify risks to achieving our business objectives. Through the risk assessment process, we considered our human rights impact where we cause, contribute to, or are directly linked to modern slavery risks.

The risk identification was based on consideration of the following risk factors:

1. **Sector and industry risks** – assessed via analysis of the different categories of spend across our operations;
2. **Product and services risks** – assessed via analysis of our key services and the top categories of spend for products and services acquired during the year;
3. **Geographic risks** – assessed via analysis of our key suppliers and their primary country of operation; and
4. **Entity risks** – assessed via our supplier due diligence processes which includes sanctions checks as well as adverse media reports relating to modern slavery.

This analysis assisted us to identify the areas within our operations and supply chains with a higher potential risk of modern slavery.

TPG Telecom Modern Slavery Risk Management Process



¹ UN Guiding Principles on Business and Human Rights published in 2011 and available on https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf


Potential risks in our industry and operations

Modern slavery risk refers to the potential for exploitation of workers, often involving practices such as forced labour, debt bondage, human trafficking, and other forms of coercion.

The telecommunications sector has complex operations and supply chains. It is essential to partner with a range of service providers, associates, and vendors to deliver services effectively and efficiently to our customers.

Given this, our sector is not immune to risks relating to human rights and modern slavery. Modern slavery could arise through direct operations or by using suppliers who operate in high-risk countries, provide high risk products and services or engage in exploitative labour practices.

We continue to better understand and address the potential risk areas relating to modern slavery in our operations. Leveraging the risk assessment procedure outlined above, in 2022 we undertook a risk assessment to identify operations at a higher risk of modern slavery, detailed in the table below.




RISK TYPE	OPERATIONS AT RISK	MODERN SLAVERY RISK FACTORS
 <p>Geographic risks Some countries may have higher risks of modern slavery, including due to governance or rule of law issues, conflict, migration flows and socio-economic factors</p>	<p>Direct workforce outside Australia Approx 3,044 employees are based in Manila, Philippines providing TPG Telecom with contact centre and shared services support. Refer to the section below on 'Addressing modern slavery risks' for further details on our key mitigations.</p>	<ul style="list-style-type: none"> ● Operations based in high risk geography ● Higher prevalence of modern slavery or labour rights violations ● Use of unskilled, temporary, or seasonal labour



Risks in our supply chain

Based on our business operating model and product profile, there is a risk of modern slavery impacts through supply chain business relationships not caused or contributed to by TPG Telecom. The higher risk categories based on geographic, product and sector risks factors are outlined in the table below.

We acknowledge there are other supplier categories which may not be material with respect to our spend, however do represent higher risk factors for modern slavery for products such as uniforms, PPE and promotional material and services such as cleaning and security. Refer to the section below on 'Addressing modern slavery risks' for further details on our key mitigations.

RISK TYPE	SUPPLY CHAIN AT RISK	MODERN SLAVERY RISK FACTORS
 <p>Geographic risks Some countries may have higher risks of modern slavery, including due to governance or rule of law issues, conflicts, migration flows and socio-economic factors.</p>	<p>Customer Services Outsourced contact centres, logistics and platforms</p> <p>Intercarrier International Roaming carriers</p>	<ul style="list-style-type: none"> Operations and workforce based in high-risk countries with higher prevalence of modern slavery or labour rights violations Use of unskilled, temporary, or seasonal labour
 <p>Product and services risks Certain products and services may have higher modern slavery risks because of the way they are produced, provided or used.</p>	<p>Devices Handsets, modems, and accessories</p> <p>Information and Communications Technology Products and services to maintain and operate the network</p>	<ul style="list-style-type: none"> Complex and multi-level supply chains with some manufacturing operations based in high-risk countries Laptops, computer and mobile phones are within the top five imports by Australia of products from countries at risk of modern slavery²
 <p>Sector and industry risks Certain sectors and industries may have higher modern slavery risks because of their characteristics, products and processes.</p>	<p>Construction works Physical works to build and maintain the network infrastructure</p> <p>Indirect workforce in Australia Workforce employed by our network of Dealer partners. TPG Telecom does not employ workforce directly.</p>	<ul style="list-style-type: none"> All construction work is based in Australia which is considered low-risk country Some potential for vulnerable workers (i.e., non-permanent workers, including visa holders and migrant workers) Use of short-term contracts and outsourcing

Refer to the section below on 'Addressing modern slavery risks' for further details on our key mitigations.

² Global Slavery Index - Australia www.walkfree.org

Addressing modern slavery risks

Policy framework

We have a comprehensive policy framework in place, which guides our approach to managing modern slavery risks. The central document is our Code of Conduct which is our key policy document outlining the requirements that all our people must comply with.

We have a range of policies in place which set out the way we work and the expectations of our people and suppliers, as well as the mechanisms available for reporting of issues and concerns where these expectations are not being met.

Together this framework of policies outlines our responsibility to respect human rights.

How we go about our business, or the way we do business, is just as important as what we do. How we treat our colleagues, our customers and how we work with the community, is essential in building trust and fulfilling our purpose. Being clear about what we expect is important and doing what's right starts with each of our employees.

POLICY AREA	DESCRIPTION OF POLICIES IN PLACE
People Related Policies	<ul style="list-style-type: none"> ● Our Code of Conduct outlines our expectations for the behaviours of all our people. In particular it outlines our support for upholding human rights consistent with the Universal Declaration of Human Rights. ● Our Human Rights Policy recognises the potential human rights risks that may exist within our operations and makes a commitment to our customers, employees, community and suppliers to identify and respond to these risks with guidance from the principles set out in the International Bill of Human Rights, and the principles concerning fundamental rights set out in the International Labour Organisation's ("ILO") Declaration on Fundamental Principles and Rights at Work. ● Our Respect in the Workplace Policy outlines our commitment to providing a safe, flexible and respectful environment for employees and customers, free from all forms of discrimination, bullying and sexual harassment. It includes guidance on rights and responsibilities, unacceptable workplace conduct and resolving issues. ● Our Health, Safety and Wellbeing Policy recognises our duty to take all reasonably practicable steps to ensure the health, safety and wellbeing of our workers and other persons impacted by our business. It outlines the core components of our Workplace Health and Safety Management System through which our policy is implemented.
Supplier Related Policies	<ul style="list-style-type: none"> ● We expect our suppliers and business partners to uphold the same standards and to act ethically, putting our principles into practice in everything they do. The Supplier Code of Conduct sets out the minimum requirements and commitment expected of our suppliers regarding compliance with laws, labour and human rights, business integrity, workplace health and safety, privacy, business continuity and environmental management.
Risk Management	<ul style="list-style-type: none"> ● Our Risk Management Policy and risk management procedures outline the process to identify, assess, manage and report risks. This process is used to assess all strategic, operational and financial risks to TPG Telecom, including those related to modern slavery risks. ● Our Crisis and Emergency Management Plan outlines the incident management processes to follow during an emergency or crisis, including incidents relating to modern slavery.

POLICY AREA	DESCRIPTION OF POLICIES IN PLACE
Speak Up Mechanisms	<ul style="list-style-type: none"> ● Our Whistleblower Policy encourages eligible whistleblowers³ to speak up if they observe or suspect any improper conduct. It outlines how a report can be made, how we investigate and deal with improper conduct, and how we will support and protect a whistleblower throughout this process. ● Our Grievance Handling Policy applies to all our people including directors, employees, and contractors, providing a guide on what to do in the case of a grievance, and information on how a grievance is handled including how an investigation works and possible outcomes.

Respecting our employees' rights

Attracting and maintaining a diverse and engaged workforce with the right skills, capabilities and experience is critical to our success. We are committed to maintaining a diverse, inclusive, and flexible workplace to achieve our desired culture.

TPG Telecom aims to ensure that throughout our operations we respect the human rights of our employees, and partner with suppliers that respect their workers' rights and do not engage in modern slavery. In 2022, we formalised this commitment through our Human Rights Policy which outlines our stance on forced labour, child labour, discrimination, freedom of association and freedom of expression. Refer to 'Policy Framework' on page 15 for further information.

Our approach to Human Rights is included within our set of 'Responsible Business Practices', which form part of our broader Sustainability Strategy. This encompasses our commitment to employee engagement, wellbeing, health & safety and inclusion & belonging – we are focused on building an inclusive organisation where each employee feels supported to be themselves and respected at work. For further details, refer to our 2022 Sustainability Report, located on our website – www.tpgtelecom.com.au.

Case Study: Managing our Philippines operations

We work to ensure a safe, fair and inclusive working environment for all our employees located in all jurisdictions. We have approximately 3,044 (as at 31 December 2022) employees based in the Philippines who provide TPG Telecom with contact centre and shared services support. In 2022, our senior leadership team visited our Manila offices for the first time since the merger of Vodafone Hutchinson Australian and TPG Corporation in July 2020 (due to COVID-19 international travel restrictions) to reinforce the TPG Telecom values and ambition.

Specifically in response to higher risk of modern slavery based on geographical and country factors, we have implemented the following measures:

- All TPG Telecom group policies apply to the Philippines based employees (except where local laws and regulations differ).
- Recruitment policy and practices are governed by the central People Experience team based in Australia.
- Employment contract review and wage audits are conducted.
- Effective COVID-19 Pandemic response plans which included remote & hybrid work arrangements, COVID-19 vaccination drives, medical support, employee assistance program and pandemic leave.

³ Eligible whistleblowers are as follows: employees; directors; officers; suppliers (and their employees); consultants; and any relatives, dependents or spouses (including dependents of spouses) of our employees, directors, officers, suppliers and consultants.

Managing our Indirect Workforce

Our business operating model includes use of indirect workforce provided by our key service partners to deliver three main services outlined in the table below. The risk assessment in page 14 outlined the key risk factors relating to modern slavery in relation to our indirect workforce. While we have existing mitigations to manage risk, efforts in this area continue to evolve and strengthen.

INDIRECT WORKFORCE	OUR RESPONSE
<p>Customer care Use of outsourced service providers with workers located in India, South Africa, Philippines and Fiji.</p> <p>IT and Network services Use of outsourced service providers with workers located in India and Philippines to provide services to operate information systems, fixed and mobile networks.</p>	<ul style="list-style-type: none"> ● Annual compliance programs in place for outsourced contact centres including training, pulse checks, control reviews and audits. ● In FY22, the Modern Slavery Awareness e-learning module was launched to our largest outsourced contact centres in India and South Africa. ● Major contract regular reviews and oversight governance forums are in place. ● Employee compensation reviews are conducted including benchmarking review of salaries.
<p>Dealers Use of partners to provide retail services to consumers and businesses.</p>	<ul style="list-style-type: none"> ● Precedent dealer contractual terms and conditions for consumer and enterprise dealer agreements for mobility services include a right to audit, compliance with laws and applicable TPG Telecom policies. ● Precedent contractual clauses have been updated to include modern slavery. ● Quarterly Operational Reviews and Mystery Shopping Programs are in place. ● Mandatory Compliance Training Programs are in place if accessing TPG Telecom systems. ● Retail & Enterprise Dealer compliance review undertaken in FY22, and remediation action plans are underway.

Managing risks in our supply chains

We value long term partnerships with our suppliers. These strong relationships are the foundation for building trust, transparency, and open communication. Our aim is to work with responsible business partners who share the same commitment to respecting human rights.

TPG Telecom recognises that local customs, traditions, and practices may differ from country to country, but at minimum we expect that our Suppliers comply with all applicable local and international laws, including (but not limited to) all anti-corruption, anti-fraud, anti-money laundering, anti-slavery, competition, economic sanctions, export control, environmental, health and safety, data protection and labour laws and that they will monitor compliance with such laws. TPG Telecom also expects Suppliers to respect the fundamental conventions and labour standards of the International Labour Organization (ILO).

These expectations are outlined in our standard terms and conditions as well as our Supplier Code of Conduct which is issued to all suppliers.

In addition, our precedent Procurement Terms & Conditions include modern slavery clauses which outline our expectations in relation to modern slavery to our suppliers.

In 2021, we collaborated with the Telco Together Foundation to develop an Australian Telecommunications Industry Supplier Assessment Questionnaire (SAQ). This SAQ was designed with the aim to identify high risk vendors and areas of risk within our supply chain. The SAQ was issued to our top suppliers representing approximately 90% of our total procurement spend (excluding intercompany, intercarrier and government agencies). Our learnings from issuing the SAQ and review of the responses received has been used to inform the modern slavery action plan for 2022.

Our internal procurement process includes a number of pre-qualification checks to identify potential areas of risks relating to suppliers, including but not limited to:

- Health, Safety and Environment
- Data and information Security
- Economic sanctions
- Finance and Tax
- Privacy and other laws & regulations

To strengthen our due diligence relating to modern slavery, we intended to utilise a common industry supplier risk platform to enhance supplier risk screening during 2022 and develop a more rigorous due diligence framework to respond to high-risk suppliers. This project was delayed in 2022 due to external factors and work is currently underway to analyse results of the initial supplier risk screening.

Remediation processes

In 2022, we had no instances of modern slavery reported via our speak-up reporting mechanisms. As outlined in the policy framework above, we have several speak up mechanisms in place to report any fraud or wrongdoing including instances of suspected or actual modern slavery or other human rights issues. Our **Whistleblowing Policy** outlines the investigation process including, how reported matters are handled, fair treatment and protections available to whistle-blowers.

In addition, we also have an **Emergency and Crisis Management Plan** which has incident management protocols in place for senior management to manage significant incidents, including if modern slavery related incidents were to occur.

In 2023, we plan to further evolve the grievance reporting and remediation frameworks and processes to ensure we have effective processes in place to respond and remediate any instances of modern slavery in our operations or supply chain.

Training and awareness

In 2021, we provided training to all our senior management, finance and procurement team members on modern slavery risk identification, reporting and remediation.

In 2022, the TPG Telecom developed a modern slavery training module to improve the awareness of our people. The course covered what constitutes modern slavery through use of case studies relevant to the telecommunications industry as well as information on how to identify modern slavery and how to report instances of modern slavery if identified.

The Modern Slavery Awareness training module was launched to all Australia based employees and our major outsourced contact centres with a progressive plan to roll-out the training to direct and indirect workforce based in other locations. We are monitoring completion rates and report on progress to the Executive Leadership Team and Audit and Risk Committee.

Industry collaboration

We are active members of the Industry Impact Hub, established by the Telco Together Foundation, where we collaborate with the telecommunication industry to address key social issues confronting our community.

In December 2020, we signed an Australian Telecommunications Leadership Statement⁴ on Human Rights and Modern Slavery, committing to work cooperatively to eliminate modern slavery practices where they are identified and to share case studies of best practice. That statement includes a set of Telecommunications Industry Modern Slavery Leadership Principles, drawing on best practice standards for business conduct set out in the UN Guiding Principles on Business and Human Rights.

In 2022, through the Telco Together Foundation, TPG Telecom agreed on a shared Modern Slavery Supplier Risk Platform. The platform will be utilised by all major Australian telcos to assess modern slavery risk in our supply chain. It will also provide for an industry-based approach to analyse, monitor, report, manage and engage our suppliers on modern slavery issues. Implementing this approach will be our focus with the Telco Together Foundation going forward as the Modern Slavery Supplier Risk Platform was launched in early 2023.

Telecommunications Industry Modern Slavery Leadership Principles

1. We acknowledge and respect human rights in our operations and supply chains, and understand the importance of identifying and addressing human rights impacts.
2. We seek to cooperate across our value chain, in areas where we can add more value than working independently; to identify issues, share insights, and continually learn.
3. We understand the complexity of supply chains and, subject to law, will undertake to share insights, aiming to increase transparency, visibility and facilitate cooperative responses.
4. We acknowledge the risk of modern slavery and harm to people as a key driver for business action, to be considered along with other risks such as financial, market, operational or reputational risk.
5. We recognise the importance of working in partnership with our suppliers to mitigate risks, supporting them in their efforts to address modern slavery in their own supply chains.

⁴ A full copy of the Australian Telecommunications Leadership Statement on Human Rights and Modern Slavery can be accessed on the Telco Together Foundation [website](#).

Assessing effectiveness

In 2022, we started formalising and tracking a number of KPIs to assess the effectiveness of our modern slavery governance framework as outlined in the table below.

KEY PILLAR	MEASURED BY	HOW THESE MEASURES HELP US DRIVE ACTIONS
Leadership	<ul style="list-style-type: none"> Number of Human Rights & Modern Slavery Committee meetings held Attendance of Committee members 	Drives collaboration and engagement amongst senior leaders including commitment to our modern slavery response
Risk Management	<ul style="list-style-type: none"> Number of suppliers risk assessed through the Supplier Risk platform Number of risk & control reviews performed in key risk areas 	Any changes in operations or supplier risk profile can be identified and appropriately actioned
Capability	<ul style="list-style-type: none"> Percentage completion rates for Modern Slavery Awareness training module 	Improves awareness and engagement amongst the organisation, employees and suppliers to take appropriate action
Performance	<ul style="list-style-type: none"> Progress of initiatives on the Modern Slavery Strategic Action Plan Number of human rights and modern slavery related grievances reported & actioned 	Monitors the progress of the Modern Slavery Strategic Action Plan and review increases or trends in any grievances reported
Collaboration	<ul style="list-style-type: none"> Attendance at Telco Together Foundation (TTF) modern slavery meetings Collaborations with other modern slavery experts and industry bodies 	Knowledge gained on what actions are taken by peers and leading organisations to improve our own Modern Slavery Action Plan

Looking ahead

As our understanding of human rights issues and modern slavery risks evolves, we continue to strengthen our approach to combat modern slavery. The table below outlines the progress made on our commitments for 2022 including the initiatives planned for 2023, many of which are underway.

2022 ACTIONS	PROGRESS	2023 OUTLOOK
Leadership		
<ul style="list-style-type: none">Define a long-term strategic plan to combat modern slavery through the development of a roadmap of initiatives and Key Performance Indicators to track the effectiveness of our actions.Develop a Human Rights Policy statement to confirm our commitment to human rights and expectations of all our people and suppliers.	<ul style="list-style-type: none"> <i>Modern Slavery Governance Framework has been developed.</i> <i>A strategic action plan has been drafted and is being put forward for endorsement by the ELT and Board.</i> <i>Refer to the section on 'Governance' on page 10</i> <i>Human Rights Policy was developed and communicated.</i>	<ul style="list-style-type: none">Refresh the Human Rights and Modern Slavery Committee Charter.Obtain Executive and Board endorsement for the Modern Slavery Strategic Action Plan and progress implementation of the initiatives.
Risk Management		
<ul style="list-style-type: none">Implement a common industry supplier assessment tool to perform risk reviews of supplier base to identify suppliers in high-risk category of modern slavery. Following from this, develop a due diligence framework to address higher risk suppliers.	<ul style="list-style-type: none"> <i>Modern Slavery SAQs were issued to our suppliers and responses analysed to understand risk exposure. However, the launch of our industry supplier risk assessment platform was delayed.</i> <i>Refer to the section on 'Managing risks in our supply chains' on page 18</i>	<ul style="list-style-type: none">Launch due diligence framework in conjunction with the supplier risk platform to assess and manage the risks within our supply chain.
Capability		
<ul style="list-style-type: none">Develop an e-learning module to be accessed by a broader range of direct (i.e. employees) and indirect workplace participants such as Dealer networks and Contact Centre providers.	<ul style="list-style-type: none"> <i>Modern Slavery Awareness e-learning module was developed for all employees. Progressive roll out is in progress.</i> <i>Refer to the section on 'Training & Awareness' on page 18.</i>	<ul style="list-style-type: none">Provide targeted training to employees in areas such as Procurement, Finance and Retail.Launch e-learning module to Dealers.

Performance

- Continue to improve procurement practices through standardisation and automation of our systems and processes. Continue to update precedent contractual arrangements.
- Improve the modern slavery grievance and remediation frameworks and processes.



Work continues on transforming procurement processes and systems post-merger.

Updated precedent contractual arrangements.



Refer to the section on 'Managing risks in our supply chains' on page 18

- Continue to improve supplier due diligence and relationship management.
- Incorporate detailed modern slavery remediation plans within the 'Crisis and Emergency Management Plan'.

Collaboration

- Collaborate with the Telco Together Foundation to implement a common industry supplier assessment tool.



The collaboration with our industry peers and Telco Together Foundation is an ongoing commitment.

Refer to section on 'Industry Collaboration' on page 19.

- Continue partnership with TTF to address modern slavery in the Telco industry.
- Partner with other bodies and experts in modern slavery.



Complete



In progress



Delayed

Appendix 1

Reporting entities

This statement has been prepared as a joint statement pursuant to the MSA covering the following reporting entities:

- AAPT Limited ACN 052 082 416;
- iiNet Limited ACN 068 628 937;
- PowerTel Limited ACN 001 760 103;
- Telecom New Zealand Australia Pty Ltd ACN 050 060 341;
- Telecom Enterprises Australia Pty Limited ACN 062 920 601;
- TPG Corporation Limited ACN 093 058 069;
- TPG Holdings Pty Limited ACN 003 328 103;
- TPG Internet Pty Ltd ACN 068 383 737; and
- TPG Telecom Limited ACN 096 304 620.

Appendix 2

MSA criteria

The table below indicates aspects of our statement which relate specifically to the mandatory criteria for modern slavery statements in the MSA.

MSA CRITERIA	RELEVANT SECTIONS OF OUR STATEMENT
Identify the reporting entity.	About this statement (page 3) Our structure (page 6) Appendix 1 (page 23)
Describe the structure, operations and supply chains of the reporting entity.	About TPG Telecom (page 6)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity (and any entities that the reporting entity owns or controls).	Potential risks in our industry and operations (page 13)
Describe the actions taken by the reporting entity (and any entity that the reporting entity owns or controls) to assess and address those risks, including due diligence and remediation processes.	2022 Highlights (page 4) Understanding and Managing Modern Slavery Risks (page 10) Looking ahead (page 21)
Describe how the reporting entity assesses the effectiveness of the actions it takes to assess and address its modern slavery risks.	Assessing effectiveness (page 20)
Describe the process of consultation with any entities that the reporting entity owns or controls and, for joint statements, the entity giving the statement.	About this statement (page 3)
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Message from the CEO (page 5) Looking ahead (page 21)

