

# BAI Communications Group Modern Slavery Statement

1 July 2023 – 30 June 2024



## ■ ABOUT THIS STATEMENT

This Statement is made by the BAI Communications holding company Frequency Infrastructure Australia Holdings Pty Ltd under the Australian *Modern Slavery Act 2018 (Cth)* on behalf of each of the BAI Communications companies covered by this Statement. This Statement sets out the steps that the BAI Communications group of companies have taken and are continuing to take to ensure that modern slavery is not taking place within our operations or supply chains.

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# Message from our CEO

“Modern slavery encompasses slavery, human trafficking, servitude and forced labour. BAI Communications respects and supports human rights. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting appropriate and effective systems and controls in place to reasonably safeguard against modern slavery occurring within our business or supply chains. We are working to identify and address these practices if they occur, through due diligence and risk management processes, and maintaining a culture that encourages people to speak up when something is not right. During the past 12 months, we did not identify any instances of modern slavery occurring in our operations or supply chains”



Peter Lambourne  
Chief Executive  
Officer  
8 November 2024

## COMPANY STRUCTURE

The following companies: (each a “Company” and collectively “BAI Communications”) are covered by this Statement:

Frequency Infrastructure Australia Holdings Pty Ltd (Ultimate Holding Company)
BAI Communications Holdings Pty Ltd
BAI Communications Pty Ltd
BAI Critical Communications Pty Ltd
Digital 4 Pty Ltd
BAI Communications Networks Pty Ltd





# BAI Communications Operations

BAI Communications is shaping the future of shared infrastructure and wireless solutions in Australia, bringing fresh, independent thinking to the connectivity landscape for mobile network operators, broadcasters, governments, private enterprises, transit, and venues. Together we are working to realise their communications vision, focusing not just on the immediate future, but on the possibilities that exist over long-term partnerships.

Operating one of the most extensive broadcast transmission networks in the world, we provide a range of services to TV and radio broadcasters nationally delivering 59 million broadcasting hours to 99% of the Australian population. In times of crisis, national broadcasters rely on BAI Communications to maintain the connection with Australians, and emergency services rely on us to help keep them informed. Our state-of-the-art robust communications systems enable government authorities, public safety and emergency services organisations and other businesses and their customers to stay connected and productive by reducing costs and unlocking new revenue streams.

We also deliver high-quality communications infrastructure to mobile network operators and largescale transit systems, provide tower and fibre co-location services for wireless carriers, service providers, enterprise and public sector customers and operate and maintain critical communications networks



1. Appoint local individuals to provide “first in maintenance” services for all sites;
2. Where possible, for site works required at regional and remote locations, works should be awarded to regional and remote based SMEs; and
3. Purchase of consumables to be completed within the local area.







# International Sourcing - Major Equipment



Our key suppliers are long term stable partners in the areas of broadcast and telecommunications network equipment; information technology hardware, software and services; construction and maintenance services; and general business consultancy services.

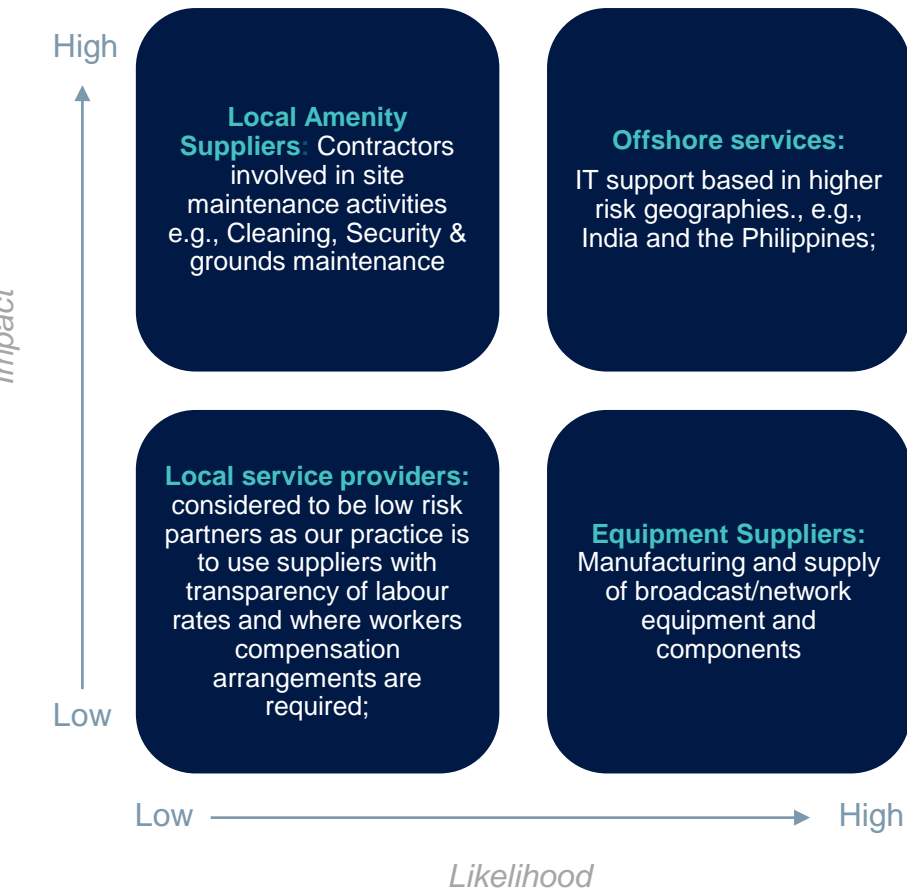
These suppliers are located predominantly within Australia, Europe, the United States, China, Japan, the Philippines, India and Hong Kong.

Equipment/Component Providers	Off-Shore Services (Predominately IT Support & Other Incorporated companies)	Local Amenities & Service Providers (e.g. Cleaning/Security)
Germany Italy Finland USA Taiwan China Japan	India Philippines USA Hong Kong	Australia



# Supply Chain Risks

We have completed a supply chain risk assessment identifying four key supply areas where there is considered to be some level of modern slavery risk:



Modern slavery risks exist in IT support-based services, the supply chain origin of equipment components and amenity related services. These areas present the greatest risk in our supply chains and are therefore our greatest priority in assessing and de-risking.

Our practice for these suppliers is to obtain their Modern Slavery Statement where modern slavery laws are applicable. If not applicable, we ask them to complete a Modern Slavery Questionnaire to identify any potential risks in their supply chains. Additionally, and in particular for supply of equipment, our policy is to seek wherever possible to minimise contracting tiers to reduce the number of contracting parties and focus efforts to ensure the modern slavery practices of those parties are sound.

When considered appropriate, training is provided to our key suppliers to ensure they are informed and are aware of their legal obligations.



# Risk Mitigations

To ensure organisations involved in our supply chain and operations comply with our values regarding modern slavery, we have in place a modern slavery compliance program. All suppliers are pre-qualified prior to appointment and submission of purchase orders via our supplier pre-qualification assessment procedures and questionnaire. Our compliance program consists of:

- 1 Utilising internal resources where appropriate prior to going to market for external suppliers;
- 2 Adhering to our procurement processes to ensure that suppliers are adequately vetted, e.g. through the completion of Supplier ISO Accreditation and Management Systems;
- 3 Conducting supply chain mapping and risk analysis appropriate for the supplier and when required by local laws;
- 4 Requiring our key suppliers to comply with our Code of Conduct and, where modern slavery laws are applicable for those suppliers that are considered to be high risk, provide a copy of their Modern Slavery Statement published under their relevant jurisdictional legislation; and
- 5 If the above is not available, and where relevant, suppliers complete a Modern Slavery Questionnaire. Our Code of Conduct exemplifies our commitment to responsible business practices and sets out our expectations for how our employees, contractors and suppliers should act.





# BAI Compliance Program



## Mandatory Staff Training

We provide training to Company employees and contractors as follows:

1. All employees are required to comply with our Code of Conduct that sets out the minimum ethical standards expected of employees, contractors and suppliers;
2. All employees must complete an online corporate induction to ensure they understand the Code of Conduct and are made aware of our policies; and
3. A modern slavery e-learning module has been developed to raise awareness about our approach to ensuring it complies with its legal obligations. All relevant employees complete this training bi-annually.



## Contract S

Our Legal Team conducts regular reviews of relevant Companies' key internal precedent supplier contracts and updates them, where applicable, to include relevant and appropriate modern slavery clauses providing obligations on key suppliers to ensure they comply with modern slavery legislation.

Where a Company enters into contracts prepared on third party contract terms, our practice is to ensure such contracts contain relevant and appropriate provisions that include obligations on third party suppliers to ensure they comply with modern slavery legislation.

Where modern slavery laws are applicable, we also require suppliers confirm that they have taken appropriate steps to reduce the risk of modern slavery occurring within their business and that they hold their own suppliers to account over modern slavery



## Policies

BAI Communications has in place a number of policies to ensure we conduct business in an ethical and transparent manner. These include:

1. Procurement policies that establish ethical sourcing principles that are implemented through a Supplier appointment procurement process that ensures goods and services are procured within a structured, ethical and competitive process;
2. We operate robust recruitment policies, including conducting eligibility to work in country checks, for all employees to safeguard against human trafficking or individuals being forced to work against their will;
3. We have a Whistleblowing framework in place and we provide individuals in all of our businesses with access to an independent third party whistleblower hotline where all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal; and
4. Our Code of Conduct sets out the manner in which we behave as an organisation and how we expect our employees and suppliers to act.



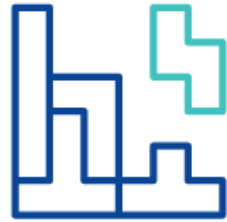
# Actions throughout the period



**65** Modern slavery assessments completed in the period prior to onboarding

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Modern Slavery awareness introduced within Supplier performance discussions



Supply Chain Analysis completed on external expenditure



Modern Slavery awareness training completed for all BAI Staff

We use the following key performance indicators to measure how effective our programs to mitigate the risks of modern slavery occurring in our business:

1. Completion of internal audits by our Risk and Compliance Team (modern slavery is included in every internal audit scope and reviewed where applicable);
2. Modern slavery is discussed during periodic risk workshops with relevant business and support functions such as Procurement, Supply Chain, Legal and People & Cultures (P&C);
3. Our P&C function ensures that all BAI Communications employees are paid at or above minimum wage levels;
4. Appropriate communication with the next link in the supply chain for goods and services in our business to ensure their understanding of, and compliance with, modern slavery legal obligations;
5. We monitor our whistleblower channels for any allegations of modern slavery occurring in our business or supply chains (no such allegations have been made); and
6. Completion by relevant employees of training modules.



# Watchpoints & Working Group



## Next period focus areas

Focused due diligence on evolving technologies within the telecommunications sector (New Markets)

Wages and working conditions of our contractor base especially local service providers

Further educate and collaborate with our supply chain partners in managing risks



## Working Group & Consultation

A working group of stakeholders from across the Legal, People & Culture, Procurement and Risk and Audit Teams at BAI Communications continues to examine existing systems and processes we have in place to introduce new systems and processes to assess and address the risks of modern slavery in the operations and supply chains of our Group companies.

This Statement made pursuant to the *Modern Slavery Act 2018 (Cth)* constitutes our modern slavery statement for FY24.






# Approval

This statement for BAI Communications was approved by the Board of Frequency Infrastructure Australia Holdings Pty Ltd as the parent entity on 28 October 2024.

Signed by:

  
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Peter Lambourne

Director