



Modern Slavery Statement of Symbio Holdings Limited

**Reporting Year: 1 July 2022 to 30 June 2023
(FY23)**



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A foreword from our CEO

Symbio Holdings Limited is pleased to be submitting its fourth modern slavery statement under the Modern Slavery Act for the reporting period of 1 July 2022 – 30 June 2023 (FY23).

We continue to support the aims of the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) and the Australian Government’s objective to have the Australian business community identify and address their modern slavery risks and maintain responsible and transparent supply chains.

FY23 has been a transformative year for our Environmental, Social and Governance (ESG) journey, and I’m pleased to report that we now have a clearly defined environmental, social, and governance framework. These material topics were framed into our detailed ESG strategy, informed by the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB) IT Services Sector reporting standards. Our ESG vision, “A future transformed” will be delivered through 3 pillars: Empowered people & connected communities”, “Secure and transparent systems” and “Building resilient operations and supply chains”. Reflecting our commitment to continuous improvement in reducing the risk of modern slavery in our operations and supply chains, this third pillar in our ESG strategy includes modern slavery initiatives which we will implement across the business.

We set clear expectations for our people to conduct business responsibly through our company values, Code of Conduct and Human Rights Policy and we encourage them to report any concerns through our Whistleblower Policy. We also set clear expectations for the people we do business with, and our principles are incorporated into our Supplier Code of Conduct, which our suppliers are expected to follow.

Taking action to combat modern slavery makes good business sense. We look forward to continuing to report on our progress.

1. Who are we

This Modern Slavery Statement is made by Symbio Holdings Limited (ACN 118 699 853) (**Symbio Holdings Limited**) for the financial year ending 30 June 2023.

2. Our structure, operations and supply chains

Our Structure

Symbio Holdings Limited is an Australian public company, limited by shares. We are listed on the Australian Stock Exchange.

Symbio Holdings Limited is the parent entity of a global group of companies known as Symbio Group. Other entities which form part of the Symbio Group, including Symbio Holdings Limited's Australian, Malaysian, New Zealand, Singapore, US and UK based subsidiaries, provide products and services of a similar nature to those described below.

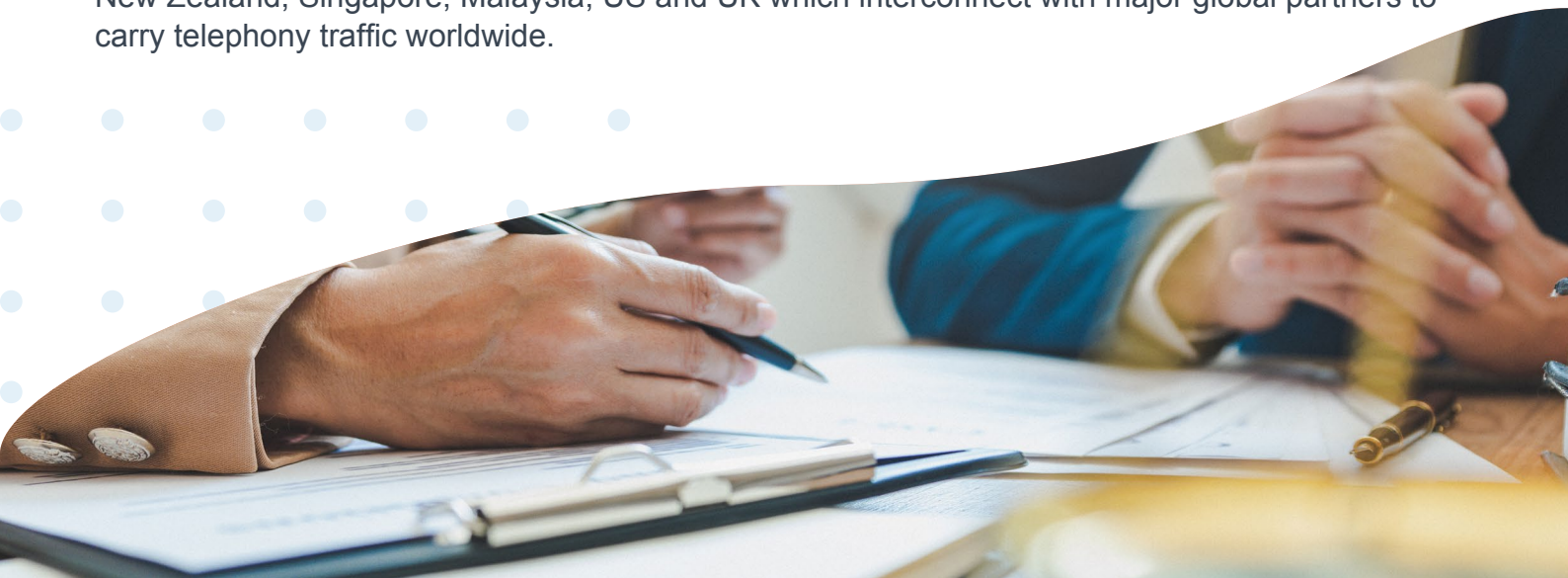
In this Modern Slavery Statement, we refer collectively to the global group of companies (including Symbio Holdings Limited and its subsidiaries) as the "Symbio Group". We refer to the reporting entity itself as "Symbio Holdings Limited", "we", "our" and "us".

Our Operations

Symbio Holdings Limited is a Software-as-a-Service (SaaS) company that enables innovative communications technologies through its proprietary software platforms. It provides communication services to software companies, telecom providers and enterprise customers across Australia and internationally.

We have approximately 530 employees (as at the end of the reporting period), with a large proportion based in Sydney and Melbourne where the core group functions are predominately performed. The core group functions include the Executive, Finance, Legal, Core Technology, Corporate Experience and each of our core business units (detailed below).

The Symbio Group has offices located in Sydney, Melbourne, Auckland, Wellington, Singapore and London. Our operational call centres are directly managed and located in Sydney and Melbourne. There is a specialised team in Wellington, New Zealand and Singapore who are primarily channel sales and operational teams. Symbio Group employees in the UK perform customer facing functions to maintain a global 24/7 presence for our customers. We own and operate an Internet Protocol Voice network with points of presence in major Australian data centres across the capital cities in major states. We also own and operate points of presence in New Zealand, Singapore, Malaysia, US and UK which interconnect with major global partners to carry telephony traffic worldwide.



Our goods and services comprise of the following three core business units:

	Communication Platform as a Service (CPaaS)	Telco as a Service (TaaS)	Unified Communication as a Service (UCaaS)
Description	Provides access to phone numbers, voice call termination and messaging, enabling large software companies and service providers to deliver sophisticated voice services	Provides a marketplace for turnkey telecoms services, enabling small, localised service providers to offer a complete suite of services to their customers	Provides quick and easy access to cloud-based enterprise infrastructure from partners like Microsoft, Cisco and Twilio
Customers	Software companies & Global Telecoms	Retail telcos & Managed Service Providers	Enterprise & Government
Products	Numbers & porting, call termination & messaging	White label telecom, billing software, managemnet software	Microsoft Teams, Cisco Webex, Contact Centre
Division KPI	7.3M Phone Numbers (30-Jun-23)	180K Services in Operation (30-Jun-23)	144K Seats (30-Jun-23)

Our core offering does not include on-selling hardware, such as telephony handsets or equipment, to our customers.

Our Supply Chains

We procure goods and services in the following key categories:

- voice termination services and nbn services; mobile and MVNO products; interconnection services; colocation services; ethernet access; backhaul and dark fibre and transmission services;
- IT hardware (e.g. switches, routers, laptops, phones) and software;
- office facilities and office supplies (including stationary);
- outsourced service providers (provision of software engineering and support services by third parties to support the delivery of products and services by the Symbio Group);
- corporate/professional services, including banking and insurance services, financial and taxation advisors, legal advisors;
- travel and hospitality; and
- marketing services and merchandise.

There have been no significant changes to our supply chain during the current reporting period. The majority of goods and services that we procure come from suppliers based in Australia. Telecommunications services providers in Australia comprise the most significant portion of our supplier spend. Our offshore service providers, including service providers based in India, Vietnam, the Philippines and Malaysia also comprise a key component of our procurement spend.

3. Risks of modern slavery practices in our operations and supply chains and the operations and supply chains of any entities we own or control

Key risks identified using modern slavery indicators

We have identified the key modern slavery risks in our operations and supply chain as follows, based on the guidance provided by sources such as the Global Slavery Index 2023 published by the Walk Free Foundation (**Global Slavery Index**) as well as considering factors such as the nature of the supply, the location from which the goods or services are supplied and the value of the supply:

A. Outsourced service providers	B. Facilities
<p>We have interconnection service providers based in numerous countries outside Australia, predominantly in New Zealand and South East Asia. Some of these services are provided in countries which the Global Slavery Index ranks in the middle range in terms of modern slavery risks, such as Malaysia.</p> <p>We also have suppliers providing outsourced support services based in India, Vietnam and the Philippines, which the Global Slavery Index also ranks in the middle range in terms of modern slavery risks.</p> <p>We have a number of controls in place to manage modern slavery risks associated with these suppliers, including conducting supplier surveys, contractual commitments in our written agreements with suppliers (such as the commitment to comply with laws and relevant policies including our Supplier Code of Conduct), regular engagement between these suppliers and senior members of our team (including established reporting processes), provision of training to our team, direct engagement with employees of these suppliers where relevant (including communications, briefings and complaint reporting mechanisms).</p>	<p>We have identified that a modern slavery risk arises in relation to the cleaning services we utilise to support our leased office space. These services may be procured directly or through a third party, such as the building services manager. Cleaning services are a high-risk sector due to the nature of the service itself and the use of low-skilled workers providing manual labour and who are often employed based on non-permanent labour arrangements. In Australia, each of our facilities service providers have modern slavery statements available on their websites which we have reviewed to confirm their commitment to address the risk of modern slavery.</p> <p>We procure a limited amount of office supplies such as paper, which is recognised as a higher risk product, together with other office stationery. As a large percentage of our employees work in a hybrid manner, including remotely, our consumption of these types of office supplies, and paper in particular, has reduced significantly.</p>

C. Networking Equipment and Services

We use networking equipment procured from large hardware vendors and transmission services procured from major carriage service providers in Australia, who we understand to have confirmed their support to adhering to the requirements of the Modern Slavery Act.

E. Marketing services and merchandise

Whilst our procurement of marketing merchandise (including textiles such as t-shirts and jumpers) forms only a small part of our procurement activities, we understand this is a high risk area in our supply chain. Merchandise is sourced locally where possible and care is taken to procure reputable products, some of which comply with standards such as those accredited by organisations such as Worldwide Responsible Accredited Production (WRAP), Confidence in Textiles (tested for harmful substances), Better Cotton Initiative and Fair Labor Association.

D. Technology

We procure hardware for our data centres (such as routers, switches, fibre and ethernet) some of which is sourced, either directly or indirectly, from countries such as China which the Global Slavery Index lists as a country with a higher modern slavery risk rating. We appreciate that such telecommunications equipment may carry higher modern slavery risks because of the way in which, and where, they are manufactured i.e. there are geographic and industry risks associated with telecommunications equipment. As part of our risk assessment, we consider what our key suppliers of hardware, fibre and ethernet for our data centres do to mitigate the risk of modern slavery.

We also procure technology equipment for our employees, such as laptops and phones, from suppliers and acknowledge that such goods are often manufactured in high risk countries and due to the nature of the supply chain it can be difficult to properly manage the risk of modern slavery for these types of supplies. We ensure that our procurement is from reputable suppliers and endeavour to reduce the number of suppliers that we engage with where possible, to ensure that we appropriately engage with those suppliers and identify and manage any risks. Our material suppliers in this category have modern slavery statements which demonstrate they have appropriate policies and procedures in place to address modern slavery.

Our operations – employment of direct / permanent workers

Employment of direct workers by us and the potential for the Symbio Group to cause or contribute to modern slavery risks through its direct employment practices is considered to be an area of low risk. We have robust policies and processes in place (as detailed below) and regularly assess and ensure that our employment agreements and practices are compliant with all laws in the relevant jurisdiction.

4. What we have done to assess and address modern slavery risks, including due diligence and remediation processes

Symbio Holdings Limited has policies and processes in place, which have been utilised throughout the reporting period, to assess, address and manage the risks of modern slavery across the organisation.

Additionally, Symbio Holdings Limited has implemented new processes during the reporting period to further enhance its modern slavery compliance framework.

Set out below is an overview of the steps we have taken during this reporting period to assist in assessing and addressing the risk of modern slavery in our operations and supply chains, including the policies and processes we have in place to facilitate risk assessment, prevention and mitigation.

- Risk Management Framework

During FY23, we have further developed our due diligence and risk assessment process for modern slavery through the enhanced utilisation of our risk management framework, which is used to manage risks across the business. This enterprise-wide risk management framework has been further developed to incorporate modern slavery risks and allows for detailed management at the business unit level. Governance is provided through oversight by the board and the Audit and Risk Committee, with accountability through the Executive Risk Committee. This framework supports our assessment and monitoring of identified risks as we utilise it to consider and to measure our controls and mitigations for modern slavery risks within each relevant business unit, and then monitor continuing risks on an ongoing basis.

- ESG Strategy

Symbio Holdings Limited developed its inaugural ESG Strategy during the reporting period and has since launched this ESG Strategy, demonstrating its ongoing commitment to managing environmental, social and governance risks and impacts within our business. Our ESG Strategy includes various initiatives and action plans, supported by a strong governance framework. One of our three core pillars is “Resilient Operations and Supply Chains” which includes initiatives targeted at enhancing our modern slavery compliance framework. Additionally, this pillar includes initiatives targeted at enhancing our procurement framework. Both of these initiatives will deliver improvements to our management of modern slavery risks.

- Supplier Management - Monitoring and Assessment

We conduct an annual review of our major suppliers, which takes into account various factors including the type of supply (informed by the Global Slavery Index), location of supply and the value of the annual spend. We also review the due diligence undertaken in the relevant period and determine whether additional due diligence is required to be undertaken.

- **Supplier Surveys**

We continue to use our supplier survey to build awareness of modern slavery risks amongst relevant key suppliers and to identify modern slavery risks in our supply chains. The survey requests information relating to:

- **Due Diligence** which enables us to assess whether the supplier:
 - has policies and processes to identify and manage modern slavery risks and investigate incidents within its organisation;
 - provides training to its employees on modern slavery risks;
 - conducts due diligence for modern slavery risks in its own supply chains;
 - requires its own suppliers to conduct due diligence for modern slavery risks on their suppliers; and
 - has engaged in conduct such as withholding pay or retaining workers' identification documents;

- **Policies and Processes** which enables us to assess whether the supplier has policies and processes in place to effectively remedy any modern slavery incidents within its organisation and actions the supplier would take if an incident of modern slavery is identified.

- **Vetting new suppliers**

During this reporting period, we have continued to evaluate relevant new suppliers in line with the Modern Slavery Act as part of our selection criteria and onboarding process. Relevant new (or renewed) supplier contracts include a contractual commitment from suppliers which requires a supplier to do all acts reasonably necessary to ensure that no modern slavery occurs in the supply of the services to Symbio Holdings Limited and to provide information to allow Symbio Holdings Limited to comply with its obligations under relevant laws.

- **Co-operating with our Customers to support Modern Slavery**

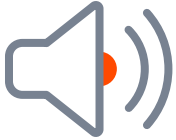
We respond to requests to complete supplier surveys at the request of our customers, to support their assessment of modern slavery risks and compliance obligations. This reinforces our monitoring and assessment practices on an ongoing basis.

Improving employee awareness of modern slavery risks

This reporting period, our employees have undertaken online modern slavery training, demonstrating our continued commitment to training and education of employees in the relevance of modern slavery to our business. Employees also received training on related policies and procedures (set out further below), which support adherence to our modern slavery management framework.

Our existing Policies and procedures

We have a number of complementary policies and procedures in place which create a robust framework to support the identification and assessment of modern slavery risks. We provide regular training and updates to employees to support a culture of compliance. These policies and procedures include:



Whistleblower Policy: This policy provides a procedure for the reporting of misconduct, dishonest or illegal activity or any other improper state of affairs that has occurred within the organisation. Our officers, employees, contractors or suppliers may report modern slavery risks or incidents under the Whistleblower Policy. Training on the Whistleblower Policy is part of Symbio Group's induction program for new employees and regular compliance training.



Code of Conduct: The Code of Conduct applies to all Symbio Group employees and sets out the standards of behaviour that the Symbio Group expects of its employees. Employees must behave honestly, professionally and ethically in all aspects of their employment; must not engage in bribery or corruption; must be aware of their duty to ensure their own safety and that of others in the workplace and must comply with all applicable laws. The Code of Conduct was updated during the reporting period and employees are required to undertake regular training on the Code of Conduct.



Human Rights Policy: This policy applies to all Symbio Group employees and suppliers and business partners are also encouraged to respect it. This policy outlines our commitment to respecting human rights and sets out how we aim to act with respect to employees and third parties.



Grievance and Dispute Resolution Policy: This policy was updated during the reporting period and sets out procedures to resolve certain types of employee disputes and grievances effectively.



Anti Discrimination, Harassment and Bullying Policy: This policy details the obligations of all employees not to discriminate against, harass or bully other people at work and outlines our standards and commitment to compliance with applicable laws. It also sets out avenues for resolving grievances.



Supplier Code of Conduct: During the reporting period, we released our latest Supplier Code of Conduct and it is available on our website and is provided to relevant suppliers. The Supplier Code of Conduct outlines our principles relating to the protection of human rights and requires our suppliers to adhere to these principles. It includes details of the standards which apply to suppliers workers relating to labour, the environment and ethics, including modern slavery.

5. How we assess the effectiveness of our actions

Symbio Holdings Limited assesses the effectiveness of our actions to assess and address modern slavery risks in various ways.

We have reviewed our performance against the key performance indicators outlined in our Modern Slavery Statement for FY22. We completed the employee modern slavery training referred to above which is now part of our annual compliance training program for employees. This educational training was further supported by a communication to employees which aimed to continue to enhance awareness across the organisation of the importance of properly identifying, addressing and monitoring modern slavery risks in our operations and supply chains. Relevant employees also continued to use resources published through industry bodies and other sources to ensure we kept up to date with developments relating to modern slavery relevant to our business.

Additionally, during the reporting period, we achieved two additional organisational goals which demonstrate the effectiveness of our actions relating to modern slavery. These goals, outlined in further detail above, were the development of our ESG Strategy which includes modern slavery initiatives, together with the further utilisation of our risk management framework which has enhanced how we identify, address and monitor modern slavery risks in a consistent way across the business.

We get feedback from our employees in relation to the modern slavery training they undertake and consider areas for improvement based on that feedback, such as subsequent updates to the training material. We also update our policies and procedures regularly to ensure they remain effective and are meaningful to our employees.

Our employees support the facilitation of regular feedback and engagement with our external stakeholders. Our Products and Sales teams facilitate regular communication with our customers and our Operations team and business units facilitate feedback from our service providers.

During the reporting period, we continued to participate in industry groups such as our membership with the telecommunications group, the Telco Together Foundation, which identified Modern Slavery as one of its collaborative action projects. This type of industry participation ensures that we can utilise shared resources, contribute to developments relevant to the telecommunications services industry and understand trends and issues being experienced by similar product and service providers. Our participation in industry groups supports Symbio Holdings Limited's understanding of industry specific developments in modern slavery and better informs us in the continued development of our modern slavery framework.

In this reporting period, we did not identify any specific incidents of modern slavery in our operations and no specific incidents from within our supply chains were reported to us. Following our review of our actions in the current reporting period, we have given consideration to opportunities for further improvement as part of our continuing obligation to address modern slavery risks in our operations and supply chain. In the next reporting period, we plan to:

1. Commence the implementation of the initiatives which form part of our ESG Strategy as they relate to modern slavery.
2. Update our Whistleblower policy and have employees undertake relevant training to enhance awareness.
3. Continue to enhance the utilisation of our risk management framework to manage modern slavery risks.
4. Continue to monitor and assess modern slavery risks using our existing policies and processes, including for both existing suppliers and as we enter any new markets or engage new suppliers.
5. Continue providing awareness training to all employees on modern slavery.

6. How we consulted with entities we own or control

Symbio Holdings Limited has ensured that each member of the Symbio Group has been made aware of the requirements of the Modern Slavery Act and relevant materials have been made available to ensure our approach as outlined in this Modern Slavery Statement is collaborative and well-understood. Through its executive team, Symbio Holdings Limited has consulted with the relevant entities it owns or controls (as defined in the Modern Slavery Act) in the development of this statement.



7. Approval and signing

In accordance with section 13 of the Modern Slavery Act 2018 (Cth), this Modern Slavery Statement was approved by the Board of Symbio Holdings Limited, in their capacity as principal governing body of Symbio Holdings Limited, on 23 November 2023.

Signed by:

A handwritten signature in black ink, appearing to read 'Rene Sugo', written over a horizontal line.

Signature

Rene Sugo
CEO and director of the Board of Symbio Holdings Limited
13 December 2023