



Modern Slavery Statement of Symbio Holdings Limited

**Reporting Year: 1 July 2021 to 30 June 2022
(FY22)**



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A foreword from our CEO

Symbio Holdings Limited formerly MNF Group Limited (ACN 118 699 853) (**Symbio Holdings Limited**) is a leading provider of software and services for cloud communications. Our platform enables some of the world's leading innovation companies to launch and scale communication services without constraints. We are headquartered in Sydney, Australia. Symbio Holdings Limited joined the Australian Stock Exchange in 2006.

Symbio Holdings Limited is committed to doing our part as an organisation to help combat modern slavery. Modern slavery is a term that describes serious exploitation. It includes human trafficking; slavery; servitude; forced labour; debt bondage; forced marriage; and the worst forms of child labour.

At Symbio Holdings Limited, we believe we have a responsibility to respect the human rights of our people and other individuals with whom we interact or who are impacted by our business. This responsibility means Symbio Holdings Limited:

- strives to avoid causing or contributing to adverse human rights impacts through our own activities and addresses such impacts if they occur;
- seeks to mitigate adverse human rights impacts in relation to our operations and supply chains; and
- supports the *International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights*.

We expect our suppliers to respect the human rights of their employees and those who are impacted by their business. This expectation is codified in our Supplier Code of Conduct which is communicated to suppliers and available on our website.

We support the aims of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and the Australian Government's objective to create more openness and transparency when it comes to the issue of modern slavery.

We are a values led company and the objectives of the Modern Slavery Act align with our core values, which include to be Honest & Fair, Collaborate, Be Brave and Care.

Symbio Group is submitting its third modern slavery statement (**Modern Slavery Statement**) under the Modern Slavery Act for the reporting period of 1 July 2021 – 30 June 2022 (**FY22**).

I am pleased to report that over the course of this reporting period we have made progress on all four key performance indicators we aspired to in our previous statement. Critically this included developing an internal Modern Slavery Response Plan to ensure we have clear internal processes and a framework when responding to a potential modern slavery incident, ensuring our Supplier Code of Conduct continues to be communicated with suppliers, continuing to educate our procurement managers and reviewing and considering the supplementary guidance released by the Australian Border Force.

This approach of setting clear goals ensures we are accountable and have a clear plan for continuous improvement when it comes to addressing modern slavery risks in our operations and supply chain. In this third Modern Slavery Statement we outline what we have implemented in this reporting period and where we are heading to next.

We recognise the importance of assisting in combating modern slavery around the world and protecting human rights and freedoms. We look forward to continuing to report on our progress.

Approval and signing

In accordance with section 13 of the Modern Slavery Act 2018 (Cth), this Modern Slavery Statement has been approved by the Board of Symbio on 24 November 2022.



Signature

Rene Sugo
CEO and director of the Board of Symbio Holdings Limited

1. Who are we

This Modern Slavery Statement is made by Symbio Holdings Limited (formerly MNF Group Limited) (ACN 118 699 853) (**Symbio Holdings Limited**) for the financial year ending 30 June 2022

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 part of a global group of companies known as the “**Symbio Group**”. Symbio Holdings Limited has a number of subsidiaries but none of these subsidiaries met the threshold to be a reporting entity during FY22.

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

The Symbio Group has 6 offices located in Sydney, Melbourne, Auckland, Singapore, the UK and Malaysia.

We have approximately 450 employees, with a large proportion based in Sydney and Melbourne where the core group functions are predominately performed.

The core group functions are the Executive, Finance, Legal and Compliance, Engineering and IT Systems, Product and Operations, Customer and Supply Chain Management.

Our operational call centres are directly managed and located in Sydney and Melbourne. There is a specialised team in Auckland, New Zealand and Singapore who are primarily channel sales and operational staff directly hired by the Symbio Group. The Symbio Group staff in the UK perform customer facing functions to maintain a global 24/7 presence for the Symbio Group’s customers.

Symbio Holdings Limited is a leading provider of software and services for cloud communications headquartered in Sydney, Australia. We offer virtualised digital services and telephony-related services.



In FY22 we undertook a restructure to focus on the growth of our core cloud communication offering. This involved the sale of some parts of the business. Symbio commenced an organic entry into the Malaysia market late in FY22.

Following the restructure, our goods and services now comprise of the following three business units:



Communication Platform as a Service (CPaaS) – this business division provides voice and messaging capabilities to global customer communication services across multiple regions. CPaaS is an infinite-scale digital network serving billions of conversations that bridge cloud software and communications services using APIs for voice, messaging, and numbering. We continue to target migration from in country carriers and win customers away from incumbent telcos. Our expansion to Singapore and Malaysia has solidified this offering in FY22.



Unified Communications as a Service (UCaaS) – this business unit provides cloud-based enterprise calling and collaboration services utilising Symbio's carrier grade network, it includes Symbio Enterprise Calling and our partnership with Cisco in Singapore. We supply voice calling capabilities to our enterprise and government customers either directly or via our IT and technology partners. As a preferred supplier to government we can deliver the security, stability, and quality that government agencies need. We continue to work actively with our software partners, Microsoft and Cisco on joint sales and marketing programs, supporting their needs for a voice carrier to round out their unified communications solutions in Australia, New Zealand, and Singapore.



Telecom as a Service (TaaS) – this business division continues to enable entrepreneurs and challengers to compete against incumbent telcos through the emergence of cloud communications, mobile services, as well as nbn in Australia. Technical changes such as the roll out of 5G and the nbn are key growth drivers for TaaS. TaaS encompasses Unite Calling, Mobile and Broadband.

- **Unite Calling** - is a modern, cloud-based telephone system. Unite Calling enables IT and telecom service providers to add calling capabilities, quickly and easily to Microsoft Teams.
- **Mobile** – we expanded our mobile offering in FY22 with the addition of data banking and data pooling features allowing customers to save or share their data. We expect this product suite to expand in FY23 with our expansion into 5G.
- **Broadband** – we enable our customers to access to nbn solutions together with our voice offerings.



CORE technology – in FY22 we have launched our Symbio SuperCore, AppCore and GeoCore initiatives this year that collectively accelerate growth across our three business divisions:

- **Symbio SuperCore** – provides a single entry point to regional hubs allowing customer to reach and access multiple countries.
- **National Core Network** – the National Core Network project was completed in FY22, this project focused on improving capacity, resiliency, and voice quality for all our customers and forms the backbone of our world class voice offering.
- **Security** – we have continued to invest in fraud and risk management tools, along with regular information security audits to keep abreast of the growing global challenges around cyber threats.
- **Scam prevention** – we have taken a focused approach to assisting our customers as well as providing our operational teams with bespoke tools and systems to combat the growing volume of scam calls, engaging with international peak regulating bodies in defining industry protocols. We are continuing to work on developing tools to assist our customers using data analytics and automation, so that our customers are notified even quicker of potential scams.

Our core offering does not include on-selling hardware, such as telephony handsets or equipment, to 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 all major states. We also own and operate points of presence in New Zealand and Singapore, which interconnect with major global partners to carry telephony traffic worldwide.

Our Supply Chains

We procure goods and services in the following key categories:

- voice termination services and NBN services;
- interconnection services;
- mobile and MVNO products;
- hardware (e.g. switches, routers) for data centres;
- colocation services;
- ethernet access;
- backhaul;
- dark fibre and transmission services;
- office supplies;
- professional services; and
- marketing merchandising.

The majority of goods and services that we procure come from suppliers based in Australia. The bulk of our procurement spend is on our top 5 telecommunications services providers in Australia. We do have a supplier in the Philippines and in Malaysia who provide remote assistance, however, all arrangements in place comply with the local standards for workforce employment and all new suppliers are required to comply with our Modern Slavery onboarding processes and procedures.

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

No specific incident identified

In our third 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.

Key risks identified using modern slavery indicators

We have identified potential modern slavery risks in our operations and supply chain as follows (through the process set out in our FY20 statement). This foundational risk mapping exercise continues to inform our approach:

Geographic risks	Product and services risks
<p>Some countries may have higher risks of modern slavery. The Global Slavery Index 2018 published by the Minderoo Foundation (Global Slavery Index) ranks countries based on the government response to modern slavery. The bulk of our procurement spend is on suppliers based in Australia. However, our suppliers may procure goods and services (which are then on-supplied to us) from overseas. For example, some of our hardware for our data centres, dark fibre and office supplies may come from China which the Global Slavery Index lists as a country with a higher modern slavery risk rating. We have interconnection service providers based in numerous countries outside Australia including in Malaysia which the Global Slavery Index ranks in the middle range in terms of modern slavery risks</p> <p>We also have suppliers based in the Philippines, which the Global Slavery Index also ranks in the middle range in terms of modern slavery risks.</p>	<p>We procure cleaning services for our offices, which is globally recognised as a higher risk service (for example, it often involves lower wages and manual labour). We do procure a limited amount of office supplies such as paper, which is recognised as a higher risk product.</p>

Sector and industry risks	Entity risks
<p>We procure hardware such as routers and switches and fibre and ethernet for data centres and 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 have considered what our key suppliers of hardware, fibre and ethernet for our data centres have done in relation to modern slavery risks. We have found that these key suppliers have previously published modern slavery statements so they have an awareness of modern slavery risks.</p> <p>We understand that textiles is a high risk industry but our procurement of marketing merchandising (including textiles) only forms a small part of our procurement activities.</p>	<p>We understand that modern slavery risks can be entity based. We use networking equipment from large vendors and transmission services from major carriage providers in Australia who report under the Modern Slavery Act.</p> <p>Moreover, we reviewed the responses of our major suppliers (by spend, vendor market share and operational role in our network) who completed the supplier surveys and/or have provided detailed modern slavery statements. From their responses and/or modern slavery statements, the entities surveyed did not raise issues of concern regarding modern slavery and had procedures in place to identify modern slavery risks.</p>

Since identifying key areas of risk in FY20, in this reporting period we have continued to focus on sending our supplier survey to our suppliers in higher risk categories.

We continue to target the supplier survey to our suppliers in the Philippines due to the Philippines being a country in the middle range in terms of modern slavery risks and our overseas interconnection services providers given the commercial leverage we have in our direct relationships with these suppliers.

Given we have also commenced operations in Malaysia, in the next reporting we intend to consider what steps may need to be taken to address and manage supplier risks, if any, in Malaysia. We do not directly employ staff in Malaysia but have conducted modern slavery due diligence as part of our entry into Malaysia and engagement of this supplier. We will continue to consider modern slavery risks as part of our ongoing operations in Malaysia.

We continue to use the Global Slavery Index as a tool to assist us in conducting risk assessments of existing and new suppliers particularly as we expand in the South East Asia region.

Our operations – employment of direct / permanent workers

We did not identify any significant risks in connection with the employment of direct/permanent workers nor any potential for the Symbio Group to cause or contribute to modern slavery risks through its employment practices. We regularly assess and ensure that our employment agreements and practices are compliant with all laws in the applicable jurisdictions.

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

Symbio Group takes an enterprise-wide approach to assessing and addressing modern slavery risks. We have processes in place to identify modern slavery risks and their impacts and report on outcomes across all levels of the organisation.

During FY22, we have continued to focus on surveying our suppliers who participated in our request for proposal process, building awareness of modern slavery risks amongst key stakeholders and reviewing our existing policies and procedures.

Set out below in this section is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place that can be used to facilitate further risk assessment, prevention and mitigation.

Assessing Risks

Supplier Surveys

As mentioned in our FY20 and FY21 statement, we designed and conducted a supplier survey to help identify modern slavery risks in our supply chains and had our Legal team review the questions. The questions covered:

- **Due Diligence** in terms of whether the supplier:
 - had policies and processes to identify and investigate modern slavery risks and incidents within its organisation;
 - provided training to its employees on modern slavery risks;
 - conducted due diligence for modern slavery risks in its own supply chains;
 - required 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; and
- **Remediation** in terms of whether the supplier had policies and processes to remedy modern slavery risks and incidents within its organisation and actions the supplier takes if an incident of modern slavery is suspected.

The supplier survey was also aimed at improving our suppliers' awareness of modern slavery risks and how they may contribute to modern slavery. Subsequent to rolling this out throughout FY21, we have now implemented this as part of our general business processes and it forms a standard part of our onboarding procedure in respect of higher risk suppliers in FY22.

- Vetting new suppliers

During this reporting period, we have evaluated any new major supplier in line with the Modern Slavery Act and applied a stringent onboarding process and selection criteria in consideration of our reporting requirements under the Modern Slavery Act.

- **Completing supplier surveys from our own customers**

As per our FY21 Statement, we have also completed supplier surveys upon the request of our own customers. This exercise has also helped the Symbio Group to identify modern slavery risks in its own operations and supply chains. Through completing these surveys from our customers, we found that we had a good understanding of our business in the areas where the modern slavery questionnaire focused and were able to appropriately identify how our business operates. The focus areas of our different customers' supplier surveys were consistent with the focus areas of our own modern slavery laws compliance approach, including our due diligence processes.

Improving staff and management awareness of modern slavery risks

This reporting period, we have successfully achieved our key performance indicators set out in our FY21 statement when it came to training and education of staff. The impact of this has continued to be significant, and we are continuing to cultivate awareness of modern slavery issues for our people.

This reporting period we implemented the following:

What	What was covered	Numbers
Continuing to educate our procurement staff	We have continued to deliver training and education to our staff including the provision of additional modern slavery educational materials to our procurement staff. This included our managers providing information about the Government's own resources as well as practical guide published by a respected consultancy firm to procurement staff.	Across relevant procurement roles
Company Code of Conduct training	Our online Company Code of Conduct training continues to include the topic of modern slavery and promotes our Supplier Code of Conduct and Human Rights Policy.	All staff
Including Modern Slavery clauses in new supplier contracts	In line with our KPIs from FY21 we have continued to include Modern Slavery clauses in new supply contracts. During FY22, we have continued to include a modern slavery clause in supply contracts which are up for renewal or new engagements. Our standard modern slavery clause 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.	All new suppliers

What	What was covered	Numbers
Reviewed and considered the supplementary guidance released by the Australian Border Force to evaluate if we can improve our approach.	We have reviewed supplementary guidance released by the Australian Border Force particularly in reference to criteria 3, 4 and 5 and have used this guidance to inform our response to modern slavery.	Regulatory team
Developed an internal Modern Slavery Response Plan	We have now developed an incident response plan to ensure we have clear internal processes and a framework when responding to a potential modern slavery incident.	Accessible to staff in Response
Communicated our Supplier Code of Conduct	We have continued to communicate our Supplier Code of Conduct and it features prominently on our new website.	All staff and suppliers.

Our Existing Policies and procedures

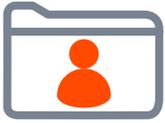
In addition to the new measures we implemented during the third reporting period, we have a number of existing policies and procedures in place to identify modern slavery risks and assess and address those risks. These policies cover the Symbio Group (including Symbio Holdings Limited and its subsidiaries). Our existing policies are:



Whistleblower Policy: This provides a procedure for any officer, employee, contractor or supplier to the Symbio Group to report misconduct, dishonest or illegal activity or any other improper state of affairs that has occurred within the organisation. This is a policy which applies to all Symbio Group employees worldwide. This policy aims to protect individuals who report concerns of wrongdoing without fear of reprisal and in the knowledge that the matter will be investigated. Given that this policy provides for the reporting of unethical behaviour, illegal activities and a failure to comply with legal or regulatory requirements, our officers, employees, contractors or suppliers may report modern slavery risks or incidents under the Whistleblower Policy. Training on the Whistleblower Policy is a part of Symbio Group's induction program for new staff members.



Code of Conduct (Global): This Code of Conduct applies to employees, directors and senior executives of the Symbio Group. It sets out the standards of behaviour that the Symbio Group expects of its staff. Staff 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.



Procurement Guidelines: We have procurement guidelines setting out our expectations of our suppliers, including in relation to addressing modern slavery risks.



Human Rights Policy: This policy applies to all Symbio Group staff. The Symbio Group encourages its suppliers and business partners to respect it. This policy emphasises the Symbio Group's expectation that its staff, suppliers and business partners respect human rights. This policy provides that if the Symbio Group becomes concerned that the products or services supplied to us are directly linked to human rights violations, it communicates our expectations to the relevant supplier or business partner and if violations have occurred, we will work with the relevant supplier or business partner to mitigate the impacts and to seek to prevent them recurring. Anyone concerned about a breach of this policy will be encouraged to report it to our Legal team.

5. How we assess the effectiveness of our actions

Symbio Holdings Limited knows it is important to be able to accurately assess the effectiveness of our actions to assess and address modern slavery risks. As our geographic locations increase and our modern slavery compliance program becomes more refined and ingrained in our general business practices, we are looking to achieve more nuance in the way we measure the effectiveness of our actions.

We currently have a risk management framework to review and monitor risks. The business is aware of modern slavery obligations and risks that need to be considered.

We have allocated responsibilities amongst our relevant staff to help facilitate regular feedback and engagement. Our Products team facilitates regular communication with our customers. Our Sales team monitors and manages the process for customer feedback. We have regular project meetings to consider the risk management framework.

While these meetings are not solely focused on our modern slavery laws approach, these meetings can be a forum to communicate our actions to manage modern slavery risks.

We are also committed to using appropriate key performance indicators to measure our progress.

As indicated throughout this Modern Slavery Statement, we progressed all 4 aspirational KPIs during the reporting period. Namely we:

1. Developed our internal modern slavery response plan;
2. Communicated our Supplier Code of Conduct with Suppliers;
3. Delivered specialised training to procurement managers; and
4. Reviewed and considered Supplementary Guidance released by the Australian Border Force to inform our approach.

We have set up the following key performance indicators for the financial year of 1 July 2022 to 30 June 2023 (FY23):

1. continuing to educate our procurement managers with specialised training. As our business becomes more diverse and our offices become more dispersed, we hope to take a unified approach to managing resources across the group. We are aiming to include a recording of our next internal Modern Slavery Training session as part of our new starter induction pack so that globally relevant staff have a working understanding of modern slavery issues;
2. support our training by developing a communication that we can circulate and upload to our intranet page. This communication should outline at a high level what modern slavery is, what resources we have in place with links to each of our resources and outlining at a high level how these resources should be used;
3. providing all Symbio staff with basic modern slavery training as part of our ongoing training program. Our ongoing compliance training contains a modern slavery module prepared by our regulatory team, which outlines basic modern slavery issues and concepts so that all staff have a base level of understanding; and
4. continuing to monitor resources published by Telco Together and consider providing their resources to relevant staff.

6. How we consulted with entities we own or control

Despite our recent restructure, Symbio Holdings Limited has continued to take a “group wide” approach to consulting with the entities it owns or controls (as defined in the Modern Slavery Act). Our executive team includes representatives from Symbio Holdings Limited’s business groups. Since 2019, Modern slavery has been included as an agenda item required for compliance in relevant executive meetings.

We have also continued to take steps to consult with key stakeholders across Symbio Holdings Limited in relation to our modern slavery compliance strategy. Members of our Regulatory and Government Relations team, Supplier Relations Management and Procurement team, Finance team, Products team, Sales team, Legal and Compliance team have been involved in taking actions to identify and address modern slavery risks.



7. Any other relevant information



Telco Together

We care about our social impact as an organisation. We are a member organisation of Telco Together, which is a platform for the telecommunications industry to make a social contribution within Australia. This includes promoting social awareness. As part of our participation in Telco Together, we have considered the work on modern slavery risks undertaken by other member organisations and measured it against what we have been doing to assess and address modern slavery risks.

Telco Together held its first Modern Slavery Round Table in 2019 during which members recognised the need to drive both operational and cultural change to reduce the instances of modern slavery throughout the telco supply chain network. We are continuing to monitor developments from Telco Together and propose to review and consider any non-binding policies and initiatives as they are developed and released.



MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

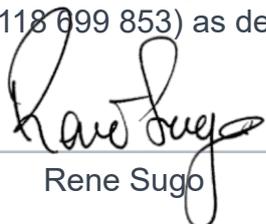
Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Symbio Holdings Limited (ACN 118 699 853) as defined by the Modern Slavery Act 2018 (Cth)¹(“The Act”) on

24 November 2022

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Symbio Holdings Limited (ACN 118 699 853) as defined by the Act.


Rene Sugo

Mandatory criteria

a)	Identify the reporting entity.	5
b)	Describe the reporting identity’s structure, operations and supply chains.	5
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it own or controls.	8
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due dilligence and remediation processes.	10
e)	Describe how the reporting entity assesses the effectiveness of these actions.	13
f)	Describe how the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	14
g)	Any other information that the reporting entity or the entity giving the statement considers relevant.	15