

This modern slavery statement is made by Radlink Pty Ltd (ACN 128 968 865) as trustee for the Radlink Unit Trust (ABN 62 890 602 388) trading as Radlink Communications.

This is Radlink’s second Modern Slavery Statement and covers all activities undertaken during the year 1 January 2023 to 31 December 2023 (“reporting period”).

In accordance with the Modern Slavery Act 2018, this statement outlines requirements including important information regarding our structure, operations, and supply chain. It also details the potential risks of modern slavery practices in our operations and supply chains, so that we may evaluate and respond to those risks accordingly.

The statement further expands on some of Radlink’s key policies and actions taken to address modern slavery risks, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

## **1 Commitment to Combatting Modern Slavery**

Radlink is committed to ethical business practices and upholding human rights throughout our operations and supply chains whilst acting with integrity in all business dealings and relationships. Radlink is dedicated to taking proactive measures to prevent and address these issues in all aspects of our business. Radlink is also committed to ensuring there is transparency in its own businesses and in Radlink’s approach to tackling modern slavery in our supply chain.

## **2 Radlink Structure and Operations**

Radlink is a leading technology integrator in Australia that was established in 2007 and employs staff across Australia. Radlink is an end to end, turnkey communications solutions both nationally and internationally. Offering design, project management, supply, installation and commissioning, integration, and support of digital and communication technologies system and supporting infrastructure.

Radlink has a wide portfolio with an in-house engineering and design team, as well as nation-wide field services capability with civil, rigging, installation, electrical, commissioning and maintenance services.

Radlink employs approximately 440 people throughout Australia. Radlink’s head office is located at 22 Oxleigh Drive, Malaga WA 6090.

More detail about Radlink is available from the Radlink Website:

<https://www.radlink.com.au>

### 3 Radlink’s Supply Chain

Radlink’s direct global supply chain consisted of 1340 suppliers during the reporting period and included both international and Australian-based companies.

Radlink’s direct suppliers are mainly located in Australia with some suppliers in China, Denmark, Indonesia, United States of America, Taiwan, Singapore, Israel and United Kingdom.

Expenditure Category	Typical goods and services
Manufacturing	<ul style="list-style-type: none"> <li>Raw material sourcing</li> </ul>
Services	<ul style="list-style-type: none"> <li>Construction and civil works</li> <li>Network Inspection and Maintenance</li> <li>Plant and Equipment Hire</li> <li>In-house design, drafting and engineering</li> </ul>
Equipment	<ul style="list-style-type: none"> <li>Structures</li> <li>Portable / mobile digital radios</li> <li>Shelter/sea containers/outdoor cabinets</li> <li>Fibre/copper installation</li> <li>Remote base stations (RBS)</li> </ul>
Fleet and Property	<ul style="list-style-type: none"> <li>Commercial vehicles, parts and accessories</li> <li>Fuel</li> <li>Property Management services and equipment</li> <li>Waste Management services</li> </ul>
Information communications and technology	<ul style="list-style-type: none"> <li>IT Software and services</li> <li>IT hardware</li> <li>Telecommunications services</li> </ul>
Corporate Services and equipment	<ul style="list-style-type: none"> <li>Labour services</li> <li>Safety equipment and work wear</li> <li>Stationery and corporate equipment</li> </ul>

Table 1 – Overview of Radlink Supply Chain Categories

## 4 Assessing the Risks of Modern Slavery Practices

### 4.1 Assessment

Radlink has adopted the definition of modern slavery as described in the Act. This definition encompasses trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.

Radlink carried out an assessment of the business and supply chains to assess the risks of modern slavery practices. “Risks of modern slavery practices” refers to the risk that Radlink may cause, contribute to, or be directly linked to, modern slavery through our own business operations or our supply chains.

We did this by assessing our operations and supply chains with the involvement of a range of our teams, including operations, procurement, Finance & Health Safety Environment & Quality throughout our operations.

### 4.2 Operations

We assessed the risk of modern slavery in its operations for the Reporting Period as low.

Radlink’s workforce comprises mostly of directly employed permanent, Australian based employees that are engaged in accordance with Australian workplace laws, applicable awards and enterprise agreements (as applicable).

Australia is considered a low-risk environment for modern slavery practices according to the Global Slavery Index. During the Reporting Period, Radlink did not engage the services of any international migrant workers or other workers that would typically be considered vulnerable to exploitation. However, we acknowledge that modern slavery is often challenging to uncover and as such, will continue to educate ourselves and our employees on the issue and how to identify it.

Radlink has developed appropriate policies and processes to ensure that all employees are treated equally and that all conduct falls within our expectations around ethical practices and lawful behaviour, Section 6 of this Statement outlines these policies and processes adopted by Radlink to assess and address potential modern slavery risks in our workforce.

### 4.3 Supply Chain

During the 2023 reporting period, Radlink undertook a risk assessment of its direct suppliers based on geographic location and by type of goods or services provided.

The analysis considered geographic location and governance of its suppliers, and type of industry against the following risk categories:

**Geographic Location:** The analysis recognised that some geographic locations have a greater prevalence of modern slavery risk, due to factors such as governance issues, or a lack of basic needs and inequity.

**Industry Specifics:** In assessing the goods and services provided via various industries, the assessment considered the likelihood of minimum requirements for labour rights, health and safety, human rights, and community infrastructure.

## 4.4 Risks in Radlink's Supply Chain

The results of the assessment highlighted that of our direct international suppliers, the countries with a higher risk profile for modern slavery in our supply chain include China.

Having regard to the risks that Radlink identified, the areas for focus for Radlink during the year are the supply agreements we have in place for:

- The manufacture and supply of communication equipment and infrastructure from China.
- The manufacture and supply of raw steel from China.
- The manufacture and supply of batteries built in China.

It is acknowledged that, as we continue to consider this risk and necessary steps to implement our Modern Slavery Policy, Radlink will need to develop a plan to engage with our direct suppliers located in other jurisdictions, having regard to risk factors other than geographic risk (such as sector, industry, product and services risks), and also to engage with entities deeper within our supply chains.

## 5 Actions taken, assessing, and addressing modern slavery risks

During the reporting period, no incidents of modern slavery or human rights violations within Radlink or our supply chain were recorded or raised. However, we do understand that such incidents may be hard to uncover, and it is for this reason that Radlink has worked to develop policies and process to help, to the highest degree possible, to minimise any such risks in both our operations and supply chain.

Radlink also acknowledges that a deeper view of our supplier’s supply chain and practices may reveal a higher level of risks of modern slavery. As such, in the future we endeavour to gain a greater understanding of the underlying risks of modern slavery, and of our entire supply chain so that we may improve our approach to identifying and managing risks.

### 5.1 Due Diligence

Due diligence processes are the ongoing management processes Radlink adopts to identify, prevent, mitigate, and account for the risks of modern slavery practices.

Radlink conduct supplier evaluations using objective criteria including but not limited to financials, HSEQ, modern slavery, commercial performance, competence, risk minimisation, delivery performance. Radlink is committed to ongoing monitoring of suppliers, including requiring suppliers to notify Radlink of any significant changes to their supply chain.

Remediation action is required only where Radlink identifies that we caused or contributed to modern slavery practices. Remediation action seeks to overcome the adverse impact that any such modern slavery practices have had on impacted individuals.

### 5.2 Terms and Conditions

Radlink ensures that its contracts, as well as suppliers’ purchase order terms and conditions, reflect our commitment to ensuring transparency in our supply chain. In every engagement, we require that the standards in human rights and health and safety are met. This includes suppliers providing warranties that the services and supply provided are in compliance with relevant laws, Radlink has also included a modern slavery clause in our Contractor Services Agreement which will be included in all new contractor services agreements and existing agreements updated and monitored by Radlink, as we keep striving to improve our terms and conditions.

## 6 Additional ways in which we are managing risks in our operations

Radlink has developed key policies and procedures that enable the organisation to create and maintain a safe environment where potential risks are effectively managed. Some of our key policies and procedures include the following:

### 6.1 Radlink Management System

Radlink's Management system includes policies, guidelines and procedures that describe how Radlink operates covering several different compliance, sustainability and corporate social topics, such as purchasing, safety, health, environment, quality, anti-corruption, data privacy and human rights. It is available to all employees through the intranet.

### 6.2 Radlink's Modern Slavery Policy

During 2023 Radlink reviewed, and then communicated, our Modern Slavery Policy and continued to roll out our Modern Slavery Training Program on how to identify and report concerns relating to modern slavery practices to relevant Radlink employees.

Our Modern Slavery Policy applies to Radlink. Radlink's Modern Slavery Policy sets out Radlink's commitment to:

- Limit the risks of modern slavery practices in Radlink's business and supply chains
- Take action to assess and address those risks of modern slavery practices in Radlink's business and supply chains; and
- If Radlink identifies that it has directly caused or contributed to adverse modern slavery impacts in its business or supply chains, take appropriate remediation action.

Radlink encourages openness by Radlink's directors, officers, managers, employees, and consultants and supports all personnel who may raise issues relating to modern slavery. Personnel are also encouraged to provide feedback on our Modern Slavery Policy and identify ways it can be improved.



Radlink Pty Ltd as a trustee for the Radlink Unit Trust trading as Radlink Communications is committed to acting ethically and with integrity in all of Radlink’s business dealings and relationships and to taking steps to implement and enforce effective systems and controls to limit the risk that modern slavery practices are taking place in Radlink’s business or supply chains.

Modern slavery is a term which covers exploitative practices including human trafficking, sexual exploitation, forced labour, forced criminality, domestic servitude, child exploitation and forced organ removal.

This modern slavery policy applies to all persons working for or on behalf of, or providing services to Radlink in any capacity, including all suppliers, employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

To ensure the success of this Modern Slavery policy, Radlink have developed the following objectives:

- Accountability – through meeting the reporting requirements of the Commonwealth Government
- Transparency – in our own business approach to tackling modern slavery in Radlink’s supply chain
- Ethical behaviour – to promote ethical behaviour to all staff, suppliers and contractors
- Respect for stakeholders’ interests – to show respect, consideration and response to the interests of stakeholders impacted by its procurement activities
- Respect for the rule of law and international norms of behaviour – to strive to be aware of any violations within the supply chains and ensure our suppliers abide by these rules and assess and address compliance issues as required
- Take action – Assess and, as far as reasonably practicable address identified risks
- Respect for human rights – provide training to employees, contractors, and suppliers; and
- Innovative Solutions – continually improve procurement practices to become more sustainable through our supply chain.

This Modern Slavery Policy has the full support of the Directors and Senior Management who will ensure that adequate resources are made available to achieve the Modern Slavery objectives.

It is the responsibility of all Directors, Managers and employees to comply with this policy.



Stuart Palmer  
Chief Executive Officer

Figure 1 – Radlink Modern Slavery Policy

## 6.3 Code of Conduct

The Radlink Code of Conduct describes who we are as a company and what we stand for, outlining the appropriate business conduct and expected behaviours that all employees are expected to follow. The Code of Conduct summarises Radlink’s core values.

Broadly the Code of Conduct covers topics relating to sustainable practices, including but not limited to corruption, fair employment, health, safety and labour conditions, social and environmental sustainability and sustainable development.

The Code of Conduct describes who we are as a company and the high ethical standards and integrity we should follow as a company. All employees are required to undertake bi-annual training in our Code of Conduct.

## 6.4 Whistleblower Policy

The Radlink Whistleblower policy has been developed to encourage disclosure of wrongdoing and ensure individuals who disclose potential wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

It provides transparency around Radlink’s framework for receiving, handling, and investigating disclosures and ensures they are dealt with appropriately and in a timely manner.

Radlink’s whistleblower policy plays an important role in monitoring compliance with our Code of Conduct and provides an avenue for the workforce and stakeholders to make reports in relation to violations of the Code of Conduct, laws, regulations or Radlink policies.

## 7 Remediation and Management

In circumstances where Radlink become aware that there is an unmitigated and substantive risk of modern slavery practices in the supplier’s premises or under a supplier’s control, it may take a variety of course of action.

This may include the following actions:

- Radlink required personnel (Procurement, HSEQ, Finance, Governance) and the supplier will meet to discuss the breach of agreement and/or significant risks of modern slavery identified in supplier evaluation or audit.
- Formal requests requiring immediate response/ change to the suppliers’ actions in relation to modern slavery.
- Require that the supplier provide regular updates to Radlink on its progress and actions put in place, including its effectiveness of controls.
- If the supplier fails to alleviate Radlink’s concerns, and /or is a breach of the relevant agreement (as it relates to modern slavery or otherwise) Radlink may terminate its arrangements with the supplier and cease to engage with the supplier.



## 8 Monitoring our Effectiveness

Radlink has appointed its National HSEQ Manager as the Compliance Manager under our Modern Slavery Policy. The Compliance Manager has day-to-day responsibility for ensuring personnel understand their obligations under our Modern Slavery Policy, developing training programs, working with other personnel to engage with suppliers and build awareness of modern slavery practices, monitoring the use and effectiveness of our Modern Slavery Policy and working with other personnel to ensure continued improvement in Radlink’s actions to address modern slavery risks in its business and supply chains.

The Compliance Manager is supported by other Radlink personnel as necessary to carry out this role. Radlink’s Senior Management will, at its Management Meeting, consider and track progress of the implementation of the Policy and surveys and evaluations of suppliers in High-Risk Jurisdictions.

This action plan serves as a future roadmap to help enhance Radlink’s processes across different areas including governance, monitoring and reporting, due diligence, training, grievances, and enhancing our supplier risk assessments.

## 9 Modern Slavery Action Plan

Radlink has developed the below action plan that will allow us to enhance our approach to identifying and managing potential modern slavery risks in our operations and supply chain.

This action plan includes proposed actions for the short, medium, and long term. The specific actions include:

- Development of Supplier Management Framework
- Review of Self-Assessment Supplier/Contractor Questionnaire to determine new or additional risks
- Review and continue the rollout of Radlink’s Modern Slavery Training program on how to identify and report concerns relating to modern slavery practices is provided to relevant personnel and contractors.
- Review of employee and contractor grievance reporting processes to ensure they enable the reporting of concerns associated with conditions, pay, hours and other business-related human rights concerns.
- Initiation of trade compliance screening of suppliers and ensuring that exceptions are investigated and resolved.

Radlink will continue to review its processes and outcomes to ensure continuous improvement of the supply performance.

**10 Governance**

Radlink are committed to high standards of corporate governance. Our directors and relevant executive provide the direction and leadership to implement appropriate levels of governance across our organisation consistent with Radlink’s objectives. This includes ensuring that in dealing with suppliers, our decisions and actions are based on transparency, integrity, responsibility, and performance, which promotes the long-term sustainability and ongoing success of our business.

Radlink will continue to review our policies and procedures to ensure we have sound governance processes in place to meet our modern slavery compliance requirements. Radlink will conduct reviews of policies, such as our code of conduct and Whistle-blower, to ensure inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in our business and supply chain.

**11 Consultation and Governing body Approval**

This Statement has been prepared by members of the Radlink Senior Management Team. This Statement is made pursuant to the Modern Slavery Act 2018 (Cth). This Statement has been reviewed and approved by the Radlink Board of Directors.



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**Signature of Managing Director**

Jim Reid  
 .....

**Name**  
**Radlink Pty Ltd – Managing Director**

27/05/2024  
 .....  
**Date**



## 12 Definitions

### 12.1 Definition

Term	Definition
<i>Modern Slavery</i>	<p>Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.</p> <p>Practices that constitute modern slavery can include:</p> <ul style="list-style-type: none"> <li>▪ Human trafficking</li> <li>▪ Slavery</li> <li>▪ Servitude</li> <li>▪ Forced labour</li> <li>▪ Debt bondage</li> <li>▪ Forced marriage, and</li> <li>▪ The worst forms of child labour.</li> </ul>

## 13 References

Reference Documents	
<i>Internal Documents</i>	<ul style="list-style-type: none"> <li>▪ HSEQ Policy – HSEQ-POL-001A</li> <li>▪ Modern Slavery Policy - HSEQ-POL-001C</li> <li>▪ Code of Conduct – HR-POL-001A</li> <li>▪ Whistle-blower Policy – HSEQ-POL-001F</li> <li>▪ Contractor Management (including pre-qualification) Procedure – HSEQ-PROC-013</li> </ul>
<i>External Documents</i>	<ul style="list-style-type: none"> <li>▪ Modern Slavery Act 2018</li> </ul>