

Modern Slavery Statement

December 2022

1 Reporting Entity

Uniti Group

This modern slavery statement has been prepared by Uniti Group Limited ABN 73 158 957 889 on behalf of itself and each of its subsidiaries for the reporting period 1 July 2021 to 30 June 2022. Uniti's first modern slavery statement was lodged on 18 December 2021.

The full list of entities in the Uniti Group of companies is set out in Schedule 1.

All the entities specified above carry on business in Australia and are companies registered under the Corporations Act. The registered office of Uniti is Level 1, 44 Currie Street, Adelaide SA.

Uniti completed its IPO in February 2019 at which time, it was a small fixed wireless operator with market capitalisation of ~\$30m. From listing until December 2020, the company experienced rapid growth through a number of acquisitions, most notably, consolidating the majority of "challenger" participants in the greenfield fibre broadband networks market.

In July 2022, Uniti was acquired by a consortium comprising Morrison & Co, Commonwealth Superannuation Corporation and BIF IV One Holdings (a Brookfield entity) and was delisted from the Australian Stock Exchange.

Since acquisition by the consortium, Uniti has commenced implementation of new compliance and reporting requirements which will take 6 to 12 months to achieve full operation. As a result of this, Uniti has not instituted any changes to its Modern Slavery practices as it awaits direction from its new shareholders and board.

2 Operations and Supply Chains

Uniti is a diversified provider of telecommunications services with offices in Melbourne, Sydney, Adelaide, Brisbane and Perth. Since the previous Modern Slavery Statement, Uniti has undergone a minor reorganisation and now operates three distinct Business Units being: Wholesale & Infrastructure (W&I), Consumer & Small Business (C&SB), and Enterprise.

The W&I business unit is engaged in the design, installation, operation and maintenance of fibre to the premises (FTTP) open access wholesale telecommunications 'last mile' network infrastructure, operating mainly in greenfields new housing developments, in broadacre residential estates and multiple dwelling units throughout Australia.

The C&SB business unit provides retail telecommunications products and services including broadband and voice services on a mixture of owned wireless infrastructure and resold fibre access networks. C&SB has a focus on the resale of various private fibre networks as well as being a NBN reseller.

Enterprise provides intelligent voice and communications solutions over 13, 1300, 1800 calling services as well as value-added software-as-a-service data analytics and call tracking application. It also leases phonewords on these numbers.

In addition, the shared services department supports all business units, encompassing the following functions: Finance, Human Resources, Legal & Regulatory, Risk & Compliance, Group IT & PMO and Corporate Secretariat & Communications.

At present, the workforce consists of 245 workers, primarily permanent full time and part time employees with a small number of independent contractors.

Supply Chain

Uniti’s supply chain has not changed very much from the first Modern Slavery Statement although there has been a move away from use of smaller, family-run businesses. The main categories of suppliers can be broken down as set out below:

	Category	Description	Business Unit
	Telecommunications and network equipment	Supply of equipment by Australian-based suppliers who source equipment from global vendors and manufacturers. The vendors/manufacturers utilise offshore facilities for the manufacturing of equipment predominantly in Asia and some in Europe	W&I C&SB
	Independent contractors	External contractors providing construction services, supply of network infrastructure design and construct services by Australian suppliers. Installation of telecommunications equipment.	Primarily W&I
	Facilities	Leases and freehold -office and warehouse space	Whole of business
	IT equipment, software and other related services	Vendors and resellers of software and hardware	Whole of business
	Other	Supply of services including financial, legal, marketing and training	Whole of business

3 Risk of modern slavery practices in operation and supply chains

Risks in Uniti Operations

The risk of modern slavery in our own operations remains low. The majority of our direct workforce is covered by employment agreements which confer pay and entitlements which are compliant with labour laws.

We have a small indirect workforce based in the Philippines that includes customer service agents and a single contractor supplying software development services based in Georgia. The contractors’ rates are reviewed by our HR team and are all above minimum pay rates for their respective countries of residence.

Risk in Supply Chains

In FY21, we undertook a risk scoping exercise to understand the risk of Modern Slavery in our operations and supply chains, and to identify areas of higher risk in our internal operations and supply chains.

This involved undertaking a desktop exercise to understand where the risks were highest.

Uniti identified that the areas which present the highest risk of modern slavery were that of suppliers of network and IT equipment that are manufactured offshore, and in network construction. The risks within our supply chains in this reporting year remains unchanged.

Uniti is a member of the Telco Together Foundation and participated in a Modern Slavery Roundtable with other telecommunications providers in September 2022. Attendees discussed matters of concern, in particular issues affecting the telecommunications industry. Information was shared regarding risks within supply chain and some initiatives were discussed. A further Roundtable will be arranged in 2023 to review and consider priorities to be carried through to action by its members.

Network and IT equipment manufactured offshore

As in FY21, the largest category of supplier expenditure for Uniti remains in construction and maintenance of the built network, with other categories of significant expenditure including but not limited to network equipment, IT Services, software and hardware.

The business obtains its hardware and equipment primarily from suppliers based in Australia who source the hardware and equipment from global vendors whose manufacturing facilities are overseas in low-cost labour locations. Manufacture and supply of components is primarily concentrated in high-risk geographical areas such as Asia, with deep and often complex supply chains. Although almost exclusively dealing with global suppliers who have similar obligations and concerns around modern slavery, Uniti acknowledges that this remains its most potentially at-risk category.

Network construction

The construction industry employs a large number of contractors and Uniti partners with Australian-based construction companies to support building of pits and pipe.

Whilst Australia is considered relatively low risk in terms of modern slavery, we acknowledge that there is potential for workers in these industries to be vulnerable to exploitation. We recognise risks also exist in the sub-contracting of construction activities and we manage such risks through our internal procurement processes and OH&S screening.

All construction contracting companies are onboarded through our chosen partner CM3 and assessed for safety system competency and legal documentation compliance, once onboarded our finance team complete director's checks. All contractors are formally inducted through Online Induction and then complete site-specific inductions when deployed for site work for and on behalf of the Uniti Group.

Customer support - higher risk geographies

Our customer service team is supported by a small indirect workforce based in the Philippines. The team is treated as an extension of the onshore team and are embedded within the wider customer service team being included in team building events, monthly activities, year-end parties and virtual catch-ups with the wider group.

The supply contract with the Philippines provider ensures that the team members are paid above the standard rates and that the salary package includes bonuses, health insurance and life insurance. Individual team members are also interviewed to ensure that they are provided with career progression as with on-shore team members, and provided with access to the same benefits as the rest of the direct workforce.

4 Actions taken to assess and address these risks

Assessment of Risks in Supply Chains

In FY21, we contacted Uniti's 20 largest suppliers in annual spend and requested that they complete a Modern Slavery Questionnaire. In FY22, we continued this form of assessment for newly onboarded suppliers. In 2023, we will integrate the supplier questionnaire as part of onboarding new vendors. Our processes will be updated to include pre-qualification checks to identify potential areas of concern, including risks in relation to modern slavery.

Responses received to the questionnaires in this reporting period did not raise any concerns. Of the new suppliers that completed the questionnaire, only one supplier advised that it had provided accommodation to its employees. This was an exceptional case and further investigation disclosed that the accommodation was provided only because the work site was remotely situated and not part of standard practice.

One of Uniti's critical suppliers, Nokia, provided notice that it had been alerted to an incident relating to suspected use of child labour by a supplier at a Nokia project site in Philippines in April 2022. Following an investigation, Nokia suspended working with the supplier and have permanently blocked the supplier from future use or re-qualification. Whilst we were given assurance that this did not involve any projects in Australia or New Zealand, we have followed up with Nokia for additional information.

Our offshore supplier based in The Philippines has failed to respond to the questionnaire and will be followed up in the new year through the operations team who deal directly with the supplier.

Employee Training

Training is key to ensuring the group's employees are aware of standards and policies and can identify and assess risks, and that there are appropriate avenues for reporting if concerns are identified.

Uniti has recently adopted a Human Resources Information System (HRIS) which incorporates an online learning module which was launched in September 2022. The HRIS online learning module replaces a prior standalone learning management system.

Uniti's Code of Conduct was updated in August 2022 to include additional sections detailing our obligations under ESG and anti-bribery and corruption. A successful campaign was undertaken at the same time to drive completion of the new training modules HRIS.

The Risk & Compliance team intend to roll out a monthly training requirement for the business in 2023 via the HRIS which will include the Modern Slavery Awareness training module. Initially, it will be rolled out to employees involved in performing procurement function and/or who deal with suppliers; Over time, the module will be rolled out to the whole of business.

Whistleblower Hotline

As part of a wider compliance agenda, and to better align with the requirements of Uniti's new shareholders, Uniti will engage with an external supplier in order to implement a whistleblower hotline in Q2 2023.

The whistleblower hotline will be available to staff (including contractors), suppliers and customers to enable reporting of modern slavery as well as other matters of concern such as bribery and corruption.

Coupled with training to be introduced in the new year, the hotline will be another avenue of identifying possible Modern Slavery risks within our supply chains.

Risk & Compliance Platform

Uniti has implemented an online Risk & Compliance platform which offers an integrated approach to identifying, profiling and assessing risks and developing and implementing mitigating actions. The compliance management component of the platform has been configured to include Modern Slavery obligations.

Compliance reports will be reviewed by the Board on a quarterly basis to identify potential issues.

Governance

The highest level of responsibility for modern slavery sits with the Uniti Board of Directors which has oversight of strategy, business performance, compliance and risk management, including in relation to modern slavery.

At an operational level, our progress on modern slavery has been driven by a team which includes personnel from Legal, Risk & Compliance, OHS, and People & Culture.

5 Effectiveness of actions taken to assess and address modern slavery risks

In this reporting year, feedback from our questionnaires has provided some understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. We believe our understanding will be enhanced with additional training coupled with the introduction of a whistleblower hotline.

We will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address the modern slavery risks in our operations and supply chains.

6 Consultation with controlled entities

Uniti Group operates as an integrated group of companies with the same policies and systems that apply to all subsidiaries. During the reporting period this statement covers, Uniti actively engaged and consulted with all subsidiaries in the development of this statement and discussed details of the reporting requirements. This Statement was circulated to the Executive and Senior Leadership teams for comment and endorsement before being presented to the Board for review and approval.

7 Approval

This Modern Slavery Statement was approved by the Board of Directors on 16 December 2022 and is signed on its behalf by the Managing Director and Chief Executive Officer.



Managing Director and Chief Executive Officer
MICHAEL SIMMONS

Schedule 1 Uniti Group of Companies

Entity Name	ACN
Uniti Play Pty Ltd	165 954 067
Uniti Est Pty Ltd	165 954 272
Uniti Fixed Wireless Ltd	632 472 934
Uniti Retail Pty Ltd T/A Fuzenet	154 074 218
Fibreworks Internet Pty Ltd	616 520 702
Fone Dynamics Pty Ltd	166 195 946
FDX Holdings Pty Ltd	618 695 140
Call Dynamics Pty Ltd	160 887 936
LBNCo Holdings Pty Ltd	627 544 441
LBNCo BidCo Pty Ltd	627 580 518
LBN Co Pty Ltd	073 226 114
Capital Fibre Networks Pty Ltd	619 334 002
Link Us Pty Ltd	604 463 710
Service Elements Pty Ltd	600 341 008
OPENetworks Pty Ltd	118 525 821
1300 Holdings Pty Ltd	622 320 281
1300 Australia Pty Ltd	108 792 016
OptiComm Pty Ltd	117 414 776
OptiComm Integration Pty Ltd	610 697 106
Harbour ISP Pty Ltd	154 752 968

