



Modern Slavery Statement for Financial Year 2022-2023

This Statement is made by the BAI Communications Group holding company Frequency Infrastructure Australia Holdings Pty Ltd under the Australian *Modern Slavery Act 2018 (Cth)*. This Statement is made on behalf of each of the Group companies covered by this Statement and sets out the steps that BAI Group companies have taken and are continuing to take to address modern slavery practices that may occur within our operations or supply chains.

Statement from Peter Lambourne, CEO

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

Our Structure

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

Australian Incorporated	Other Incorporated
Frequency Infrastructure Australia Holdings Pty Ltd	BAI Communications Europe Limited (UK) BAI Communications Limited (UK) BAI Communications Infrastructure Limited (UK) Vilicom Engineering Limited (Ireland) BAI Communications Italia SPA (Italy)
BAI Communications Holdings Pty Ltd	Transit Wireless LLC (US)
BAI Communications Pty Ltd	BAI Communications Inc (Canada)
BAI Critical Communications Pty Ltd	BAI Communications Limited (Hong Kong)
Digital 4 Pty Ltd	Mobilitie Investments IV, LLC (US) Mobilitie Investments III-A, LLC (US) Mobilitie Investments III-B, LLC (US) Mobilitie Investments III-C, LLC (US) Mobilitie, LLC (US) Mobilitie Services, LLC (US) Signal Point Systems LLC (US)
BAI Communications Networks Pty Ltd	

Frequency Infrastructure Australia Holdings Pty Ltd (FIAHPL) is a holding company in the BAI Group and an Australian proprietary company limited by shares. FIAHPL was incorporated in Victoria, Australia on 28 March 2009 and its registered office is at Level 10, Tower A, 799 Pacific Highway, Chatswood, New South Wales 2067, Australia.

During Financial Year 2023 (FY23), FIAHPL divested its global businesses in the United States, United Kingdom, Ireland, Italy, Canada and Hong Kong. This Statement also covers the following global businesses in the period prior to their divestment during FY23.

BAI Communications Limited is a BAI Group operating company in the UK and was incorporated in England and Wales on 30 March 2016. BAI Communications Infrastructure Limited is a BAI Group operating company in the UK and was incorporated in England and Wales on 23 September 2021. The registered office for these UK operating companies is at Level 2, 2 Kingdom Street, London W2 6BD, United Kingdom.

Transit Wireless LLC and BAI Communications US Holdings III, LLC (and its subsidiaries), BAI Communications Inc, BAI Communications Limited, Vilicom Engineering Limited and BAI Communications Italia SPA are BAI Group operating companies and design, build and operate telecommunications infrastructure in the United States, Canada, Hong Kong, Ireland and Italy respectively.

The BAI Communications Group has an annual turnover in excess of A\$100m and has approximately 430 employees in Australia.

Operations

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

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

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

Our Supply Chains

The BAI Communications Group operates a preferred supplier policy. Due diligence is conducted on all suppliers in accordance with our procurement policies before approving them to become a preferred supplier.

In Australia, we engage approximately 1,100 external suppliers for the delivery and maintenance of our operations. Our assets are spread across remote, regional and metropolitan areas throughout Australia. We engage most significantly with small and medium size enterprises and local service providers that are located close to our facilities. The following is considered when allocating work to service providers, purchasing and hiring equipment and other goods:

1. Appoint local individuals to provide "first in maintenance" services for all sites;
2. Where possible, for site works required at regional and remote locations, works should be awarded to regional and remote based SMEs; and

- Purchase of consumables to be completed within the local area.

In the United Kingdom we provide high-quality communications infrastructure in large-scale transit environments and provide communications infrastructure solutions more broadly including to improve wireless services in large venues and support the creation of private networks and “smart cities”. We have established communications infrastructure businesses in the US conducted through our Transit Wireless, Mobilitie and Signal Point businesses and in the other markets that we operate in.

Our key suppliers are long term stable partners in the areas of broadcast and telecommunications network equipment; information technology hardware, software and services; construction and maintenance services; and general business consultancy services. These suppliers are located predominantly within Australia, Europe, the United States, Canada, United Kingdom, China, Japan, South Korea, the Philippines, India and Hong Kong.

Supply Chain Origin:

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

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

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

Our Code of Conduct exemplifies our commitment to responsible business practices and sets out our expectations for how our employees, contractors and suppliers should act.

Risks of Modern Slavery in the Group's Operations and Supply Chains

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

1. **Offshore services:** IT support based in higher risk geographies., e.g., India and the Philippines;
2. **Local service providers:** considered to be low risk partners as our practice is to use suppliers with transparency of labour rates and where workers compensation arrangements are required;
3. **Equipment Suppliers:** Manufacturing and supply of broadcast/network equipment and components; and
4. **Local Amenity Suppliers:** Contractors involved in site maintenance activities e.g., Cleaning, Security & grounds maintenance.

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

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

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

Our Policies

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

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

In addition, the BAI Group has committed to certain environmental, social and governance (ESG) targets in its Sustainability Report 2022 that include developing BAI's modern slavery supplier framework, updating its procurement policies and assessing all suppliers against its modern slavery framework during 2023. We have targeted to retrain all employees in an updated modern slavery awareness training program in 2024.

Key Supplier Contracts

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

Where a Company enters into contracts prepared on third party contract terms, our practice is to ensure such contracts contain relevant and appropriate provisions that include obligations on third party suppliers to ensure they comply with modern slavery legislation. Where modern slavery laws are applicable, we also require suppliers confirm that they have taken appropriate steps to reduce the risk of modern slavery occurring within their business and that they hold their own suppliers to account over modern slavery.

Training

We provide training to Company employees and contractors as follows:

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

How we assess the effectiveness of the above actions

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

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

We will take such further steps as are reasonably necessary and appropriate to combat the risk of modern slavery in our business. Over the next year, our focus will be on monitoring procurement practices and continuing to update our contractual arrangements with suppliers to include modern slavery-specific provisions where applicable.

Consultation Process

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

This Statement made pursuant to the Australian *Modern Slavery Act 2018* constitutes our modern slavery statement for the FY23.

Approval for this Statement

This Statement was approved by the Board of Directors of
Frequency Infrastructure Australia Holdings Pty Ltd on

20 December 2023



Peter Lambourne

Director