Modern Slavery Report

FY23-24

More Telecom

Tangerine Telecom

Message from the CEO

This year's Modern Slavery Statement is our inaugural statement and commitment, to a journey of continuous learning and improvement, in an effort of managing potential modern slavery risks in our operations, supply chain and the broader industry.

Our team has made tremendous progress in assessing and managing potential modern slavery risks. In the first year we have implemented our human rights policy and frameworks as a foundation and implemented risk-based activities to improve our operations and supply chains. We are also involved in tackling modern slavery on an industry level via our partnership with Telco Together Foundation.

While we have achieved a lot already, we have a clear plan for the next years to further improve our response. For the financial year 24/25 our focus will be on a more detailed engagement and collaboration with our stakeholders.

This statement was approved by the boards of More Telecom and Tangerine Telecom in their capacities as principal governing bodies of More Telecom and Tangerine Telecom on 10 October 2024.
This statement is signed by Andrew Branson in his role as the CEO and managing director for both, More Telecom and Tangerine Telecom, on 30 December 2024.

Andrew Branson
Andrew Branson

Founder, Chief Executive Officer,
More Telecom and Tangerine Telecom

Acknowledgement of Country

Wominjeka!

We respectfully acknowledge the Wurundjeri People of the Kulin Nation, who are the Traditional Owners of the land on which More and Tangerine's head office is located in Naarm (Melbourne). We pay our respect to their Elders past, present and emerging. We respectfully acknowledge the Traditional Owners of all the Lands across Australia.

2023/24 Highlights

We have

- Submitted our **Inaugural Modern Slavery Statement** (this document),

- Launched **Modern Slavery e-learning** module for all employees, to improve awareness of key issues relevant to our industry,

- Undertaken **Operations and Supply Chain Risk Assessments** to better understand potential risks relating to modern slavery,

- Undertaken **Key Suppliers Risk Assurance and Mitigation Initiatives** following the risk assessment,

- Developed and published a **Human Rights Policy** to formalise our commitment to fight modern slavery,

- Participated in the **Telco Together Foundation Modern Slavery Roundtable** events to observe and learn from larger telecommunication providers; and

- Engaged our **minority shareholder Commonwealth Bank of Australia to support** our journey to uplift our Modern Slavery responses.

More Telecom and Tangerine Telecom have addressed the seven mandatory criteria necessary for every statement under the Commonwealth Modern Slavery Act 2018. They are:

1 Reporting entities

This statement has been prepared as a joint statement pursuant to the MSA covering the following reporting entities:

More Telecom Pty Ltd; ABN 23 165 518 589

Tangerine Telecom Pty Ltd; ABN 11 602 814 791

2 Our structure, operations and supply chains

Structure

More Telecom and Tangerine Telecom operate as independent, privately limited companies with shared operations and supply chains. The group employs about 60 people directly in Australia and New Zealand. The companies do not own or control any other entity. Commonwealth Bank of Australia has a 30% non-controlling ownership stake in both of them.

Operations

More and Tangerine are service providers offering residential nbn® internet connections, mobile broadband and mobile phone plans in Australia. More Telecom also services Australian businesses with internet, data and communication solutions.

More has a strategic alliance in place with Commonwealth Bank of Australia that offers its customers access to and control of More services via their banking app, special offers for eligible customers via their CommBank Yello loyalty program or standing offers for all customers using a CBA account for payment.

Supply chain

Our main suppliers are Vocus for nbn® wholesale access, Telstra for mobile network wholesale access, as well as EMAPTA for our overseas contact and business processing centre. We also use Amazon and Casa Systems as hardware suppliers for modems and other telco equipment. Our two major IT platforms are provided by Microsoft and Utilibill.

3 Risks of modern slavery practices in operations and supply chains - Our approach to risk management

There are four key factors identified by the Australian Border Force as indicating modern slavery risks.

1. **The country or region where the supplier operates.**

   Higher risks are associated with factors such as poor governance, weak rule of law and low socioeconomic status.

2. **The industry or sector in which the supplier operates.**

   Higher risks are associated with low-skilled labour and a reliance on outsourcing.

3. **The product or service that the supplier provides.**

   Higher risks are associated with certain products, such as rubber and construction materials.

4. **The supplier itself.**

   Some suppliers may have a record of poor practices or human rights violations.

We recognise that some of our suppliers may operate in countries or sectors that have a higher risk of modern slavery. Therefore, we conduct regular risk assessments to identify and prioritise these suppliers based on various criteria, such as the nature of their business, the location of their operations, and the type of workers they employ. We also monitor any changes in the external environment that may affect the level of risk exposure.

We are committed to protecting vulnerable populations by ensuring that our suppliers adhere to strict ethical standards and labor practices.

We have mapped these key factors and relative importance of the particular supplier across our operations and supply chains to identify and better understand these risks, prioritise and ultimately mitigate or eradicate them. This risk-based approach enables us to focus on the critical areas with customized activities for maximum impact.

RISK TYPE	POTENTIAL RISK EXPOSURE	RISK MITIGATION
GEOGRAPHIC RISK	Outsourced workforce outside Australia: approx. 350 agents are based in Manila, Philippines.	Annual self-assessment questionnaire including review meeting, contractual obligations, quarterly relationship meetings.
PRODUCT AND SERVICES RISK	Devices: VOIP and modems Services: IT systems and services	Standard modern slavery clause in all contracts, due diligence on all new suppliers, ongoing screening of all major suppliers.
SECTOR AND INDUSTRY RISK	Telecom industry relies on technologies and hardware that contain mined materials that can be at risk of slavery.	Being a smaller provider our most effective avenue is via TTF MS Roundtable, best practice sharing.
SUPPLIER	Suppliers not doing the right thing.	Standard modern slavery clause in all contracts, due diligence on all new suppliers, ongoing screening of all major suppliers.

4 Our actions to assess and address these risks, including due diligence and remediation processes

As our understanding of human rights issues and modern slavery risks evolves, we continue to strengthen our approach to combat modern slavery.

Building awareness and commitment

Launched Modern Slavery e-learning module for all employees, to improve awareness of key issues relevant to our industry. Our Modern Slavery Awareness training module improved awareness and engagement amongst the organisation, employees and suppliers and take appropriate action.

Developed a Human Rights Policy, Anti-bribery and Corruption, and Whistleblower policy to formalise our commitment to fight modern slavery and to recognise our role and responsibilities in protecting and upholding human rights.

Participated in the Telco Together Foundation, Modern Slavery Roundtable events to observe and learn from larger telecommunication providers. Attendance at Telco Together Foundation (TTF) Modern Slavery Meetings. Knowledge gained on what actions are taken by peers and leading organisations to improve our own Modern Slavery Action Plan.

Enhance our understanding

Conducted a comprehensive Risk Assessment across our operations and supply chains to better understand and identify potential risks relating to modern slavery practices.

Implemented Risk Assurance and Mitigation Initiatives for selected key suppliers following the Risk Assessment, to ensure they adhere to our standards and expectations. As part of our responsibility as procurers of goods and services, we have robust due diligence processes to be confident that all our new suppliers adhere to high standards of ethical conduct and modern slavery prevention.

Engaged our minority shareholder CBA to support our journey to uplift our modern slavery responses, by leveraging their expertise and experience in this area.

2023/24 further actions and progress

One of the measures we have taken to ensure ethical sourcing and prevent modern slavery in our supply chain, is to update our existing agreements with our operations and supply chain partners, as they come due for renewal, to include a clause that requires them to comply with our Modern Slavery Policy.

Our top 6 operations and supply chain partners

Supplier/Partner	Role	MSA Reporting Obligations	Our activities
Casa Systems	Electronic equipment supplier	☑	Review of Modern Slavery Report
Commonwealth Bank of Australia	Strategic sales partner, co-owner and banking services provider	☑	Engagement in Modern Slavery reviews
eero (a wholly-owned Amazon company)	Electronic equipment supplier	☒	Review of Modern Slavery Statement
EMAPTA	Contact centre and business process outsourcing provider	☒	Individual risk assessment and measures (see details below)
Telstra	Wholesale mobile network access	☑	Participant in TTF MS Roundtables
Vocus	Wholesale nbn® access	☑	Participant in TTF MS Roundtables

EMAPTA

Exhibiting high potential risk factors due to geography, industry and nature of services, we have taken additional steps to analyse and understand the actual modern slavery risks associated with the EMAPTA relationship and to effectively respond where necessary.

Supplier questionnaire

Together with EMAPTA we utilised the Australian Telecommunications Industry Modern Slavery Self-Assessment Questionnaire developed by Telco Together Foundation. We found that EMAPTA had a mature approach to managing modern slavery through their established modern slavery framework, their anti-modern slavery policy and procedure, and associated controls in place.

Contractual framework

We have contracts in place requiring EMAPTA to understand and abide by our Human Rights Policy.

Risk-based activities

- Having an outsourced workforce in a high-risk country, we have an established risk management process in place to mitigate the risks by ensuring no contract or part-time work agreements exist.

- We also set the remuneration for all staff to ensure fair conditions.

- We ensure EMAPTA provide adequate leave, including 2 weeks Domestic and Family Violence leave which matches leave available to our Australian/NZ staff.

- Key staff have been with us for many years and we focus on cultivating an employer brand to further attract the right talent for our growing business.

- EMAPTA provide modern slavery training to all staff and we ensure staff are comfortable to speak up and are aware of our whistleblower policy.

- We continuously monitor developments and operational standards in our quarterly reviews with EMAPTA.

2024/25 Outlook

Building on our initial efforts we are implementing:

- Ongoing contractual reviews and uplift of legacy supplier contracts

- TelcoTogether Foundation's Modern Slavery Roundtable, including supplier engagement working group and supplier training

- Further EMAPTA uplift with a more detailed review of individual activities, controls

- Increasing awareness of our Whistleblower policy

- Further evolving our Domestic and Family Violence processes and support

5 How we assess the effectiveness of these actions

We evaluate the effectiveness of our actions to address modern slavery risks by setting clear objectives and performance indicators, establishing baseline measures, monitoring our progress and documenting our improvements. This is an ongoing process that we aim to further mature and plan for future actions. We also actively engage our stakeholders to seek their feedback and input on our modern slavery approach.

Working with suppliers to check how they are progressing is an essential part of our modern slavery prevention strategy. We engage with our main suppliers regularly to assess their risks, review their policies, and support their improvement plans. We also encourage our suppliers to report any incidents or concerns to us, and we take appropriate actions to address them.

Being involved in Telco Together Foundation's Modern Slavery Roundtable provides us with an opportunity to share best practices and learn from other industry leaders. It also helps us to demonstrate our commitment and leadership on this important issue.

We conducted an anonymous staff survey, including our offshore agents, with an excellent eNPS result of 52. Selected results were: 'I feel secure in my role' (80.8%), 'My workload is reasonable' (79.9%), 'I have a good work-life balance' (78.9%), 'I feel comfortable approaching my manager with any questions or concerns I may have' (84.5%) and 'I feel that the company is dedicated to diversity and inclusion' (82.5%).

From 2022 in general, all material new contracts include modern slavery clauses.

All staff participating in modern slavery eLearning.

6   Process of consultation with any entities the reporting entity owns or controls

The reporting entities do not own or control any other entities.

7   Provide any other relevant information

More and Tangerine are involved in the Telco Together Foundation's Industry Action Hub. We have submitted our Domestic and Family Violence Action Plan in May 2024. We are also participating in the Industry Modern Slavery Roundtables to share best practices and coordinate industry-level action against modern slavery.

All our public Corporate Governance documents, including our human rights policy, are published via our websites:

- more.com.au/storage/policies/April2024/20240426-MOR-More-Group-Human-Rights-Policy.pdf
- more.com.au/whistleblower-reporting
- more.com.au/storage/policies/April2024/20240426-MOR-More-Group-Whistleblower-Policy.pdf
- more.com.au/storage/policies/April2024/20240426-MOR-More-Group-Antibribery-and-Anticorruption-Policy.pdf

- www.tangerinetelecom.com.au/storage/policies/April2024/20240426-TAN-More-Group-Human-Rights-Policy.pdf
- www.tangerinetelecom.com.au/whistleblower-reporting
- www.tangerinetelecom.com.au/storage/policies/April2024/20240426-TAN-More-Group-Whistleblower-Policy.pdf
- www.tangerinetelecom.com.au/storage/policies/April2024/20240426-TAN-More-Group-Antibribery-and-Anticorruption-Policy.pdf

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