

Aussie Broadband Modern Slavery Statement

Aussie Broadband Limited (ABN 29 132 090 192) (**Aussie Broadband**) is subject to the requirements of the Australian *Modern Slavery Act 2018* (Cth) and will incorporate these requirements into its Annual Modern Slavery Statement.

This Modern Slavery (**Statement**) relates to the financial year 1 July 2021 to 30 June 2022.

What is Modern Slavery:

Universally, definitions of Modern Slavery are varied, but include exploitative practices such as human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage in serious violation of an individual's dignity and human rights.

Modern slavery occurs not only in foreign countries (which might include Australian business supply chains) but also in Australia. It is estimated, by the Australian Institute of Criminology, that up to 1,900 Australians were living in conditions of modern slavery in 2015-16 and 2016-17.

Statement from the Managing Director, Phillip Britt

'We continue to assess our vendors and suppliers to ensure our supply chain is free from modern slavery. Importantly, we're actively involved in the Telco Together Foundation's modern slavery initiative that is driving change and increasing knowledge and awareness across the telecommunications sector.'

FY2022 Attestation

To date, Aussie Broadband has not had any issues raised with it or reported to it regarding modern slavery, human trafficking or human rights, associated directly with its operations or its supply chains. This statement was approved by the Board of Aussie Broadband Limited on 16 December 2022.



Phillip Britt
Managing Director
December 2022

About Aussie Broadband

Aussie Broadband is an Australian telecommunications carrier often described as a challenger internet service provider, offering a range of services across the residential, small business and enterprise segments. Aussie Broadband has evolved from a start-up, over 17 years ago, to becoming the fifth largest provider of NBN services across Australia and a publicly listed company on the Australian Stock Exchange in 2020.

With a reputation for providing high-quality internet services and transparent customer service, we are in business to change the telco game – not just for our customers, but for all telco customers in Australia.

Aussie Broadband opposes Modern Slavery in all its forms. This Statement outlines the steps we have taken, and will take, to minimise the risk of Modern Slavery occurring in our business or our supply chains.

Aussie Broadband is based in Morwell, Victoria, and is one of the largest employers in the Latrobe Valley region. We have additional contact centres in Dandenong South Victoria, Perth Western Australia, and a sales office in Darwin. The Aussie Broadband Group consists of Wideband Network Pty Ltd, a subsidiary of Aussie Broadband.

In March 2022, Aussie Broadband welcomed Over the Wire Holdings Limited into the Aussie Broadband Group which includes the following subsidiaries: NetSIP Pty Ltd, FaktorTel Holdings Pty Ltd, Aero Telcom Pty Limited, Factortel Pty Limited, Over the Wire Pty Limited, OTW Corp Pty Limited, Telarus Pty Limited, VPN Solutions Pty Limited, Sanity Holdings Pty Limited, Comlinx Pty Limited, Access Digital Networks Pty Limited, Digital Sense Hosting Pty Ltd, Zintel Communications Pty Ltd and New Zealand subsidiary Zintel Communications Limited.

Our practices and processes documented within this statement apply across the Aussie Broadband Group.

Aussie Broadband completed its application to become a B Corp in FY22. Certified B Corporations are leaders in the global movement for an inclusive, equitable and regenerative economy with a focus on social and environmental performance. ¹

Aussie Broadband's Policies and Principles

One of Aussie Broadband's fundamental values is '*be good to people*'. Being good to people includes having a positive impact on the community. Aussie Broadband does not tolerate slavery, human trafficking, forced labour, child labour, or child exploitation. Aussie Broadband has various policies which assist in managing human rights risk within its business and supply chains, including:

¹ <https://www.bcorporation.net/en-us/certification>

- Procurement Policy
- Code of Conduct
- Whistle-blower Policy
- Gifts, Entertainment and Anti-Bribery Policy
- Grievance and Complaints Policy

Aussie Broadband is a foundational member of the Telco Together Foundation's Modern Slavery Roundtable and is a key contributor to the telecommunication industry specific supplier register.

Aussie Broadband's Modern Slavery Risk Management and Due Diligence Processes

As an Australian-based telecommunications service provider, we consider the risk of Modern Slavery within direct business operations to be low.

However, Aussie Broadband understands that through its supply chains, it can be indirectly exposed to the risk of Modern Slavery as described in the Act.

Aussie Broadband's risk management and compliance management frameworks include and consider modern slavery risks. Any identified risk in our supply chains will be investigated and monitored. We will report on that monitoring in each successive Statement.

The steps we undertake include:

1. Assessing the potential modern slavery risks in our operations and supply chains, with emphasis on high-risk geographical locations and business transactions.
2. Reviewing company policies that may raise the risk of modern slavery in our operations and supply chain.
3. Require entities to complete a self-assessment questionnaire (**SAQ**) regarding modern slavery. Aussie Broadband reviews the completed SAQ and if applicable, the entity's modern slavery statement.
4. Conducting due diligence on local and global supply chains.
5. Reviewing supplier contracts to ensure they contain terms that are consistent with the Act.
6. Taking steps to address any potential modern slavery risks.
7. Deliver training for staff in modern slavery awareness and regulatory (risk avoidance) requirements.
8. Establish a program to measure the effectiveness of our actions through performance monitoring and reporting.

Aussie Broadband Supply Chains

Aussie Broadband has a primarily Australian supply chain, with an overarching philosophy of buy Australian first. This objective ensures that we largely avoid contact with international regions of significant modern slavery risk.

Our supply chain relationships include suppliers from the following sectors:

- Information, communications and technology.
- Property services (including utilities, cleaning, waste management and security).

- Marketing, printing, promotional goods and services.
- Office supplies and corporate clothing.

Aussie Broadband strives to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. Aussie Broadband recognises that as a purchaser of goods and services, the business conduct and performance of its suppliers can have a significant impact on its performance and reputation within the communities it operates in.

Aussie Broadband conducts ongoing reviews of our supply chain to understand how/ if these sectors have the potential to expose Aussie Broadband to modern slavery and human trafficking risks. We employ our risk management and compliance management framework practices to evaluate the effectiveness of the controls, due diligence and management practices. The internal audit team completes independent assessments as required. We seek confirmation and evidence from vendors and suppliers via the modern slavery self-assessment questionnaire that was endorsed by the Telco Together Modern Slavery Roundtable. These practices apply across the full Aussie Broadband Group.

Together with the Telco Together modern slavery industry forum, Aussie Broadband is creating a set of overarching principles to aid in the identification and management of Modern Slavery risks within our supply chain. The principles are used to inform Aussie Broadband's procurement and sourcing processes.

Actions undertaken within the FY2022 to minimise the risk of Modern Slavery within our supply chain include:

- Review of (potential) high-risk suppliers.
- Specific training delivered to all staff that have delegation of authority to engage with suppliers/ vendors.
- Issuing and reviewing SAQs before engagement of suppliers/ vendors for goods and services.

Grievance, Confidential Reporting and Feedback Mechanisms

Aussie Broadband has a dedicated whistle-blower framework. This framework includes a dedicated policy, associated training and an independent third-party provider that allows employees and contractors to raise any issues or concerns in a confidential manner. Our feedback and complaint reporting process can also be used to report any concerns or queries. Grievances can be received via social media and direct correspondence.

Where grievances or concerns are raised, we will address and investigate the matter accordingly. This may include direct engagement with customers and other stakeholders. In these cases, we take steps to investigate and understand the issue(s) and take appropriate action, which may involve referring the matter to the appropriate authorities (in the case of allegations of modern slavery), or engaging with the customer about areas of concern within our organisation.

Training and Communications

Aussie Broadband has created internal positions, including Community Impact positions that have, as a part of their roles, a focus on environmental awareness, ethical conduct and modern slavery/ human rights concerns. This area of the business is expanding to ensure all and any business customer impact is monitored.

Aussie Broadband delivers modern slavery awareness training for employees that enter into contracts. The training will have a performance monitoring measure implemented to assess its effectiveness.

Ongoing Modern Slavery Mitigation Strategies:

In the next modern slavery statement, Aussie Broadband will report on the following actions:

- The progress of our B Corp application.
- Additional information on our Community Impact program of work.
- Our continued engagement in industry-wide consultation and collaboration and information/ resource-sharing through membership of the Telco Together Modern Slavery Roundtable.

For further information, please contact Andrew Webster, General Manager – Risk, Compliance & Regulatory Affairs, andrew.webster@team.aussiebroadband.com.au.

Appendix one

Mandatory reporting criteria

Modern Slavery Act requirement	This Statement
Identify the reporting entity.	Introduction (page 2). About Aussie Broadband (page 2).
Describe the reporting entity's structure, operations and supply chains.	About Aussie Broadband (page 2).
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Aussie Broadband's Modern Slavery Risk Management and Due Diligence Processes (page 3). Aussie Broadband Supply Chains (page 3).
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Aussie Broadband's Modern Slavery Risk Management and Due Diligence Processes (page 3).
Describe how the reporting entity assesses the effectiveness of these actions.	Aussie Broadband Supply Chains (page 4).
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Aussie Broadband Supply Chains (page 4).
Provide any other relevant information.	B Corporation application (page 2). Grievance, Confidential Reporting and Feedback Mechanisms (page 5). Training and Communication (page 5).