AUSSIE BROADBAND'S MODERN SLAVERY STATEMENT

Aussie Broadband

Aussie Broadband's 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 2022 to 30 June 2023.

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. The Australian Institute of Criminology estimates that up to 1,900 Australians were living in conditions of modern slavery in 2015-16 and 2016-17.

About Aussie Broadband

Aussie Broadband has evolved from a start-up over 18 years ago to becoming a key provider of NBN services across Australia and a publicly listed company on the Australian Stock Exchange in 2020. In March 2022, Aussie Broadband completed the acquisition of Over the Wire. A full list of Aussie Broadband's products and services is available at www.aussiebroadband.com.au.

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.

Additional information on Aussie Broadband can be found at www.aussiebroadband.com.au

Statement from the Managing Director, Phillip Britt

'We have proactively taken multiple steps this year to continue to increase the rigour and practices to identify and mitigate the threat and impact of modern slavery within our operations and, more broadly, the telecommunications industry.
Aussie continues our involvement in the Telco Together Foundation's modern slavery initiative that is driving change and increasing knowledge and awareness across the telecommunications sector.'

FY2023 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. The Board of Aussie Broadband Limited approved this statement on 20 December 2023.

Phillip Britt
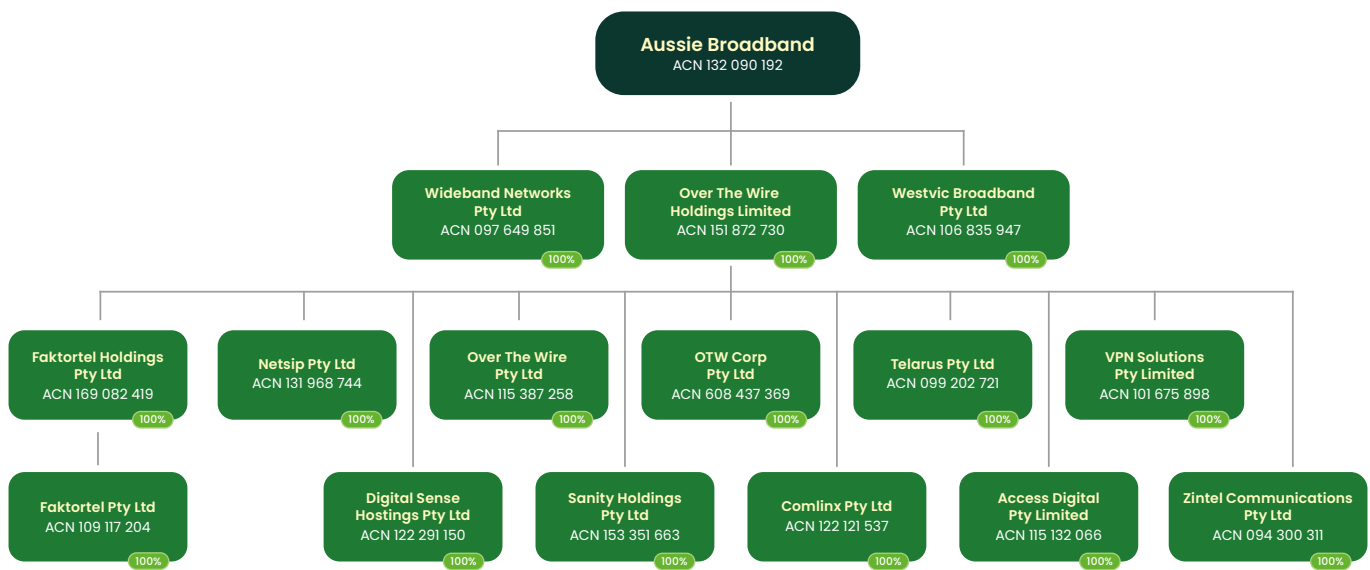**Managing Director**
December 2023

Aussie Broadband's structure, operations, and 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 offices in Adelaide, Brisbane, Darwin, Melbourne, and Sydney.

Aussie Broadband Group's organisational structure

The image below represents the Aussie Broadband Group's organisational structure.

Aussie Broadband
ACN 132 090 192

Wideband Networks Pty Ltd
ACN 097 649 851
100%

Over The Wire Holdings Limited
ACN 151 872 730
100%

Westvic Broadband Pty Ltd
ACN 106 835 947
100%

Faktortel Holdings Pty Ltd
ACN 169 082 419
100%

Netsip Pty Ltd
ACN 131 968 744
100%

Over The Wire Pty Ltd
ACN 115 387 258
100%

OTW Corp Pty Ltd
ACN 608 437 369
100%

Telarus Pty Ltd
ACN 099 202 721
100%

VPN Solutions Pty Limited
ACN 101 675 898
100%

Faktortel Pty Ltd
ACN 109 117 204
100%

Digital Sense Hostings Pty Ltd
ACN 122 291 150
100%

Sanity Holdings Pty Ltd
ACN 153 351 663
100%

Comlinx Pty Ltd
ACN 122 121 537
100%

Access Digital Pty Limited
ACN 115 132 066
100%

Zintel Communications Pty Ltd
ACN 094 300 311
100%

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

Operations

In FY23 and following the acquisition of Over the Wire Holdings Limited in March 2022, Aussie Broadband restructured its operating segments (residential, business, enterprise & government, and wholesale) with a focus on 'changing the game' through providing high-quality products and customer service. The operating segments are represented below:

- Residential: includes services to residential customers, including fixed broadband, telephony, mobile, and other value-added services. The residential segment continues to grow and provide market-leading customer service and user experience.

- Business: includes services to small and medium-sized businesses. Services include connectivity, mobile, voice and support services, leveraging our technology and customer service know-how to deliver product offerings and exceptional customer service.

- Wholesale: provides white label and wholesale capabilities to offer services (connectivity and voice) to large white label partners across all sectors (e.g., energy, retail, financial) and managed service providers (MSP) with exceptional network and customer service.

- Enterprise & government: provides enterprise and government-grade telecommunication services to large business and government customers. Examples include the following services: connectivity, mobile, voice, managed network, security, and cloud services.

- Support services: represented by finance, risk and compliance, enterprise IT, marketing and strategy, people and reputation, software and infrastructure engineering.
These teams provide core services for Aussie's operations.

Aussie Broadband Supply Chains

Aussie Broadband has a primarily Australian-based supply chain with an overarching philosophy of buying Australian first. This objective ensures we avoid or minimise contact with international regions of significant modern slavery risk.

Our supply chain relationships include suppliers from the following sectors:

- Information, communications, and technology.

- Facilities Management (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 with similar values, ethics, and sustainable business practices, including human rights-related ones. Aussie Broadband recognises that as a purchaser of goods and services, its suppliers' business conduct and performance can significantly impact its performance and reputation within its communities.

Aussie Broadband's risks of modern slavery practices in the operations and supply chains

As an Australian-based telecommunications provider, we consider the risk of modern slavery to be low. In our risk assessment, risks of modern slavery may present in our operations and supply chain from:

- Electronics and hardware sourced from overseas providers and their supply chain.

- Raw materials sourced for infrastructure projects (e.g., fibre) and their supply chain.

- Service providers located in jurisdictions with high exposure to Modern Slavery.

Aussie Broadband's actions taken to assess and address these risks, including due diligence and remediation processes

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

Our actions

- 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. The compliance management framework is built on the principles of ISO37301:2021, and our risk management framework is built on the principles of ISO31000:2018.

- Due diligence activities include adherence to our internal procurement processes, assessment of the vendor/ supplier via a bespoke modern slavery risk assessment, and completion and assessment of the self-assessment questionnaire/modern slavery statement.

- Interviews are conducted as warranted to glean additional information from the vendor/supplier. Interviews can include organisations within their supply chain.

- Aussie Broadband's internal audit team completes independent assessments as required.

- We seek confirmation and evidence from vendors and suppliers via the modern slavery self-assessment questionnaire endorsed by the Telco Together Modern Slavery Roundtable.

- Where appropriate, we inform and educate areas for improvement and opportunities with our vendors and their supply chain. This approach allows us to remedy any issues before they become material.

- Where an issue cannot be remedied or resolved, Aussie Broadband may exercise its right to terminate the contract/engagement.

Identification, analysis, and evaluation of modern slavery risks

Aussie Broadband has implemented a Modern slavery specific risk assessment process to monitor its vendors. The risk assessment is aligned with the Guidance for Reporting Entities provided in the Modern Slavery Act 2018 (Cth), considering:

- Sector and industry risks.
- Products or services risk.
- Geographic risks.
- Supply chain model risks.

A risk rating is applied for each key risk indicator, obtaining an overall score with dedicated action to implement to mitigate the risk. As part of the due diligence, entities with a high risk must complete a self-assessment questionnaire (SAQ) regarding modern slavery. Aussie Broadband reviews the completed SAQ and, if applicable, the entity's modern slavery statement.

If concerns are raised, we engage directly with the vendor/ supplier to obtain the requisite data to decide on the next steps. The following steps can include yet are not limited to:

- Undertaking an audit, including their supply chain. This may result in defined actions/ remedies to address by the supplier or a particular entity in their supply chain.
- Undertaking an education campaign with the vendors and suppliers to increase transparency and knowledge of modern slavery risks.
- Terminating the contract.

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

In addition, Aussie Broadband is implementing sustainable supply chain practices, such as:

- Paying suppliers in fair timeframes
- Avoiding undue delays to payments
- Avoiding unreasonable contract variations
- Avoiding shifts to less reputable suppliers.

Aussie Broadband's Policies and Principles

One of Aussie Broadband's fundamental values is to '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.

The following governance-related documents can assist in managing human rights risk within its business and supply chains:

- Board Charter.
- Audit, Risk and Compliance Committee Charter.
- People and Community Committee Charter.
- Code of Conduct.
- Statement of Values.
- Securities Trading Policy.
- Continuous Disclosure Policy.
- Occupational Health and Safety Policy.
- Gifts, Entertainment and Hospitality Policy.
- Speak Out (Whistleblower) Policy.

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

B Corp

Aussie Broadband achieved B Corp certification in June 2023. Certified B Corporations are leaders in the global movement for an inclusive, equitable and regenerative economy focusing on social and environmental performance.

It's always been in our DNA to be good to our people and the community, and this achievement takes all that foundational work and helps us demonstrate that for-profit companies can also be good to the planet while delivering for shareholders. Part of securing this certification was the inclusion of a purpose statement in our Constitution, which states: "The purpose of the Company is to deliver returns to shareholders while having an overall positive impact on society and the environment."

This change and a stakeholder clause were supported by our shareholders at the 2022 AGM with a vote in favour of almost 96%. Underpinning our B Corp certification are our community impact activities, which seek to build and foster strong, sustainable communities across Australia. Initiatives through our Pledge 1% ensure that as Aussie Broadband grows, so does the reach and support we provide. We have directly and positively impacted around 110,000 people through our Helping Communities Connect program, direct charity sponsorships, and the Small Change Big Change program.

We are the largest telco in Australia to be accredited as a B Corp and one of only 19 telcos worldwide. With an overall score of 96.3, we are one of Australia's best-performing B Corp Businesses with 250+ employees (top 6).

Most trusted

Trust is essential for a company, and at Aussie Broadband, we have often been recognised for our award-winning customer service and transparency in engaging with all stakeholders. In FY23, we were voted the Most Trusted Brand for Telecommunications in the Roy Morgan Trusted Brand Awards. We were also placed as the 26th most trusted brand across all industries at a time when telecommunications have become the most distrusted industry, even rated below social media.

We do not take such accolades lightly. We test every major decision we make at Aussie against our values and consider the impact on all stakeholders. We will continue to earn our customers' trust by being transparent and honest, and we hope that trust is another game we can change for the telco sector. This is applicable and demonstrable in managing modern slavery risks, compliance obligations, and, most importantly, customer expectations.

Social & Community Impact

Aussie Broadband is committed to collaborating with other members of the telco industry to address social issues, promote diversity and inclusion to all stakeholders, and embed continual learning and development for a positive experience for our staff.

In FY23, we continued our longstanding partnership with the Telco Together Foundation, focusing on initiatives that address social challenges in an increasingly connected world. Focus areas included reducing the incidence of Domestic and Family Violence for our customers and staff through the Telco Industry Domestic and Family Violence Action Framework and reducing Modern Slavery in our supply chains through operational and cultural change in our organisation and the telco industry.

Aussie Broadband is a founding member of the Modern Slavery Supplier Risk platform. This platform provides a central avenue for telco members to assess their individual and shared suppliers for modern slavery risks. It allows collaboration to help decide what actions to take based on internal and international risk profiles.

A key area of focus for Aussie Broadband is enabling and empowering Australians from lower socio-economic backgrounds to narrow the digital divide through promoting affordable internet, improved digital literacy, and access to crucial support and education functions.

Aussie Broadband works actively with the not-for-profit, government, and corporate sectors through the Low Income and Digital Inclusion Forum (LIDIF) and the School Student Broadband Initiative (SSBI). Aussie Broadband is proud to support the Financial Counselling Foundation (FCF), which provides additional support to existing grants and implements projects identified as worthy through a priority assessment and grants-based process. The current priority areas include the delivery of important initiatives to support victims of family violence, those at risk of homelessness, and First Nations communities.

Aussie Broadband is also a Gold Pledge partner of Soldier On, a not-for-profit organisation delivering holistic support services to current and former Australian Defence Force personnel and their families.

In FY23, we fulfilled our Workplace Gender Equality Agency (WGEA) reporting requirements; areas of focus included the gender pay gap, retention and attraction of female staff, and policy development. To progress our work in gender equity, and in line with International Women's Day, on 8 March, we developed Aussie's first Gender Equity Working Group. This group identified four (4) priorities to drive more significant equity for the current and potential female workforce at Aussie Broadband - Culture, Representation, Mentoring, and Parental Leave. Task forces began implementing gender equity initiatives across the company.

Aussie also joined the Telco Vendor Forum on Gender Equity, working with industry partners to advance gender equity. In building our understanding of the Aussie workforce, an inclusion and diversity questionnaire was circulated during Harmony Week. The data collected will inform our progress as we discover how to support segments of our workforce with accessibility and inclusion.

We developed additional tools to promote inclusion and diversity awareness during the year. Alongside a new inclusion SharePoint resources, we also created a calendar of inclusion events and toolkits to encourage awareness of topics including disability, microaggressions, menopause, neurodiversity, and LGBTIQ+ inclusive language. A streamlined process was also implemented to induct new employees into our inclusion activities.

Our people

At Aussie, we conduct regular assurance reviews of our people and payroll systems. These reviews ensure compliance with awards, individual contracts, and workplace conditions.

Parental policy

In 2023, Aussie Broadband announced a complete overhaul of its parental leave policy. It will vastly improve the quality of life for expectant Aussie Broadband parents by significantly expanding the available paid leave for primary and secondary carers.

Under the new policy, Aussie Broadband staffers can access up to 26 weeks of fully paid parental leave regardless of whether they are the primary or secondary carer. Employees will also be able to take double the leave at half pay. Aussie Broadband will continue superannuation contributions during this leave.

As part of Aussie Broadband's mission to be good to people, the new policy has been designed to be more accessible. Staff will be eligible for the leave as soon as they complete their probation, whereas the previous parental leave policy was only accessible after a year of employment. Aussie Broadband will include all staff on parental leave in salary reviews with total bonuses, depending on performance.

Furthermore, Aussie Broadband is implementing five (5) days paid leave for new grandparents, ten (10) days paid miscarriage leave, improved processes for parents returning to work, more flexible working arrangements for parents with children under two (2) years old, and an increase in the number of external resources provided by Aussie to new parents.

Aussie Broadband believes that one of the most powerful tools for closing the gender gap is a firm, equitable parental leave policy that allows new parents to spend the time where they need it most — with their family. Studies in Switzerland and Norway found that more equitable parental leave for both carers reduces career interruptions for both partners while enabling better work-life balance for the family.

Only 8.4 per cent of male-identifying managers currently take primary carers leave in Australia, according to research from the Workplace Gender Equity Agency. That number drops to 4.6 per cent of male-identifying staffers in non-management positions. An expansion in parental leave for secondary carers has also been linked to fewer career interruptions for women and improved workplace participation. This will also help tackle the lower superannuation for female staffers, often seen when new mothers take time away from the workplace to care for a new child.

For more information, https://www.aussiebroadband.com.au/media-centre/aussie-broadband-changes-the-game-again-with-an-industry-leading-parental-leave-policy/

Aussie Broadband's assessment of the effectiveness of these actions

Training

Aussie Broadband staff complete mandatory compliance training, commonly referred to as Aussie 101. In November 2023, more than 95% of the staff completed this training. Please note that these figures include new hires within their first four weeks who have yet to undertake the training.

In addition, Aussie Broadband delivers modern slavery awareness training for employees who enter contracts. The training will have a performance monitoring measure implemented to assess its effectiveness. In November 2023, 94.12% of the staff with a delegation of authority completed the training.

Incident Reporting and Remediation

In FY23, no incidents related to modern slavery were reported.

Internal audit

As part of our commitment to combat modern slavery and in compliance with the Modern Slavery Act 2018 (Cth), Aussie Broadband has undertaken a comprehensive internal audit of the actions implemented to mitigate the risk of modern slavery within our operations and supply chain. The audit thoroughly reviewed our Supplier Assessment Questionnaire process and contractual requirements with suppliers. The recommendations provided will serve as a foundation for refining our risk assessment methodologies and enhancing the effectiveness of our actions.

This ongoing process aligns with our dedication to continuous improvement and ensuring our efforts to eradicate modern slavery remain robust and impactful. We remain committed to transparency and will regularly assess and update our procedures to meet the highest standards in the fight against modern slavery.

Ongoing Modern Slavery Mitigation Strategies

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

- 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.

Aussie Broadband's consultation process with any entities

Telco Together Foundation

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.

Aussie Broadband is engaged with the Telco Together Foundation through:

The use of a portal to assess the Modern Slavery Risk on our supply chain.

The participation in working groups.

More information can be found on the Telco Together Foundation website (https://telcotogether.org/).

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 confidentially. Our feedback and complaint reporting process can also be used to report any problems 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 explore and understand the issue(s) and take appropriate action, which may involve referring the matter to the relevant authorities (in the case of allegations of modern slavery) or engaging with the customer about areas of concern within our organisation.

For further information, please contact:

Andrew Webster, General Manager – Risk, Compliance & Regulatory Affairs, andrew.webster@team.aussiebroadband.com.au.

Cameron Foley, Community Impact Manager - for ESG-related information, cameron.foley@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.	Aussie Broadband's structure, operations, and supply chains (page 3).
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 risks of modern slavery practices in the operations and supply chains (page 5).
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 risks of modern slavery practices in the operations and supply chains (page 5).
Describe how the reporting entity assesses the effectiveness of these actions.	Aussie Broadband's assessment of the effectiveness of these actions (page 10).
Describe the consultation process with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Aussie Broadband's structure, operations, and supply chains (page 11).
Provide any other relevant information.	Aussie Broadband's consultation process with any entities (page 11).