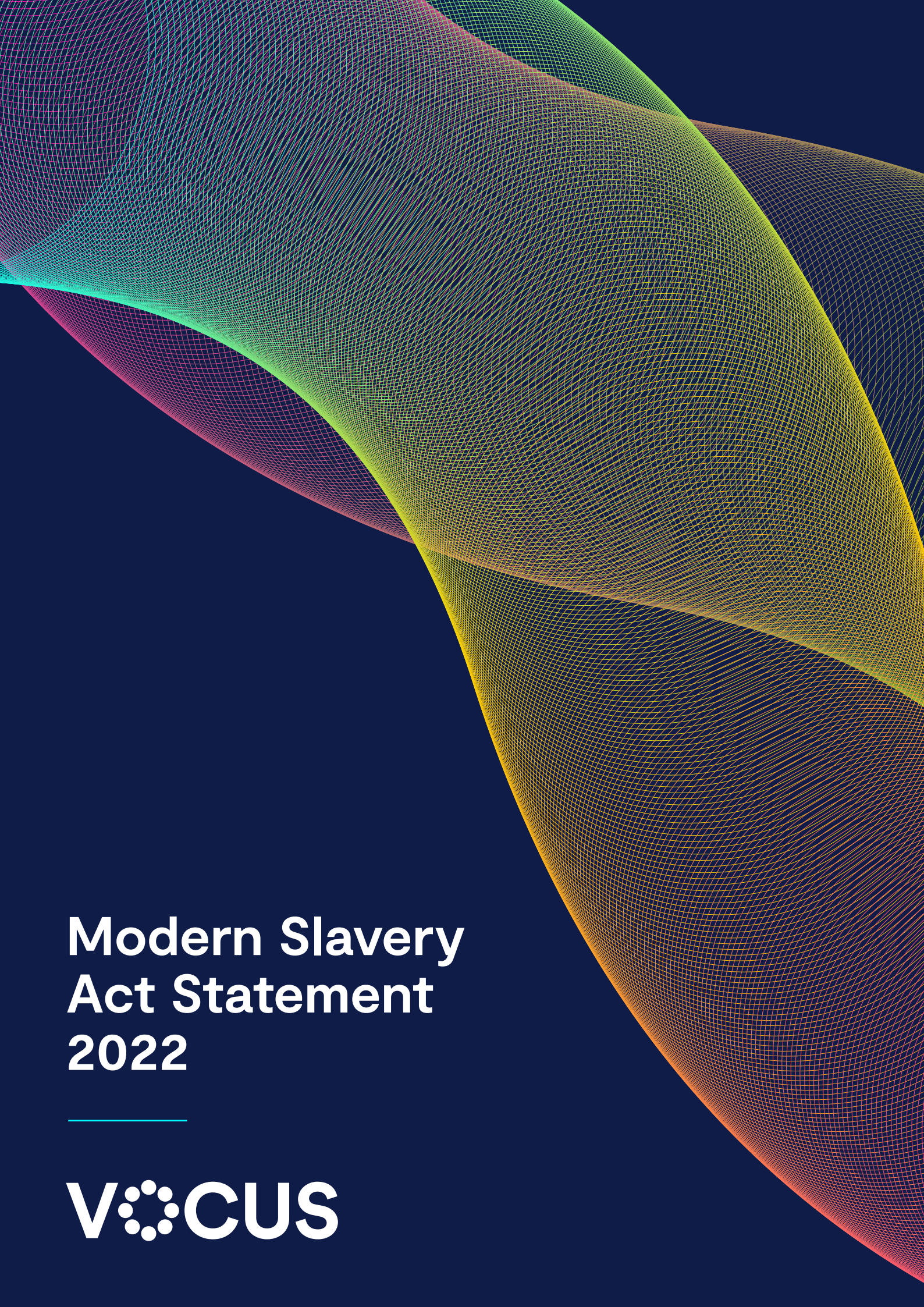
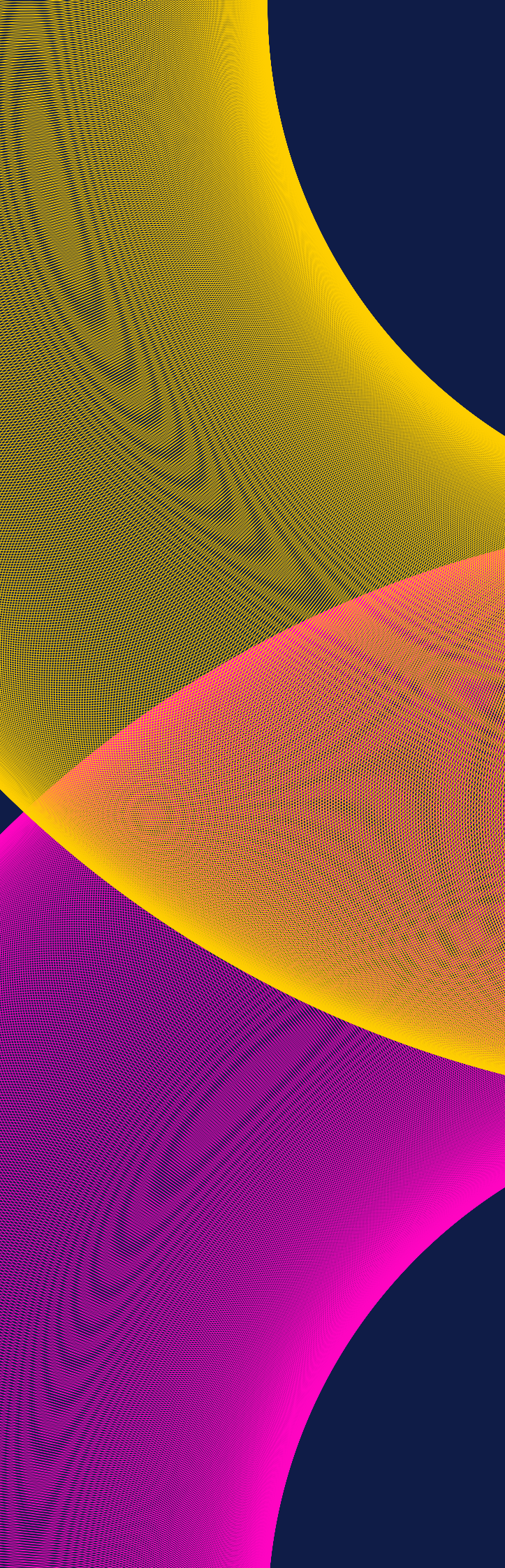




Modern Slavery Act Statement 2022

VOCUS



Vocus Modern Slavery Act Statement 2022

Vocus Group Limited is a reporting entity as defined by the Modern Slavery Act 2018 (Cth).

This is our third Modern Slavery Act Statement, and it has been prepared in respect of the financial year 1 July 2021 to 30 June 2022 (FY22). The Appendix identifies where information relating to the mandatory reporting criteria in the Modern Slavery Act can be found in this Statement.

No instances of modern slavery were reported or identified across our operations or supply chain throughout the reporting period.

This statement is available at:
<https://www.vocus.com.au/about-vocus/social-impact/governance>

Our structure, operations and supply chain

This statement covers Vocus Group Ltd and each of its subsidiaries (“Vocus”, “we”, “our”). Vocus is wholly owned by Voyage Australia Pty Ltd, a consortium of Macquarie Asset Management managed funds and Aware Super. All staff are employed by Vocus and report to its executive management team.

As Australia’s specialist fibre and network solutions provider, we own and operate more than 25,000km of secure, high-capacity fibre connecting all Australian mainland capitals with New Zealand, Asia and the USA. Our network includes the 4,600km Australia Singapore Cable from Perth to Singapore via Indonesia and the 2,100km North-West Cable System from Port Hedland to Darwin.

We own a portfolio of well-recognised telecommunications brands catering to enterprise, government, wholesale, small business and residential customers across Australia. Our primary go-to-market brands are shown below:

Retail

dodo

iPrimus

© commander

Vocus Network Services

VOCUS

Through our retail brand “Dodo”, we also supply electricity and gas to residential customers and small to medium businesses in Australia. The electricity we supply customers is sourced from the grid via the Australian Electricity Market Operator, and our gas for supply to customers is purchased from upstream suppliers. We do not own any generation or distribution assets.

At Vocus, our actions are guided by our organisational Vision, Values and Purpose. Our vision brings to life what we want to build. Our values drive our behaviours. Our purpose articulates ‘why’ we do what we do. These three elements work together to form the core ingredients of our culture and create our differentiation in the market.

Our Vision

To be the **challenger** that **our customers** deserve, and our **people** are **proud** of everyday.

Our Values



One team.

We share common goals, trust each other and collaborate to deliver.



Our people are the difference.

We build environments where our people thrive.



Disruptive thinking everyday.

We see and create opportunities, move fast and set our own course.



Crazy about customers.

We let our customers know, through great service, products and experiences.

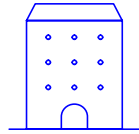
Our Purpose

Building critical connections.
Enabling better possibilities.

The acquisition of Vocus was implemented on 22 July 2021. On 20 May 2022, Orcon Holdings Limited (previously Vocus New Zealand) completed a merger with Two Degrees Group Limited (2degrees) to form a separate, New Zealand based entity. Vocus therefore no longer has any direct interest in the ex-Vocus New Zealand business. Beyond these changes, there have been no other significant changes to our operations or supply chain during FY22:



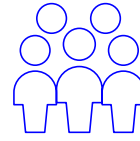
We own and operate a circ. **25,000km fibre network** across Australia that is purpose-built and managed for business, wholesale and government customers.



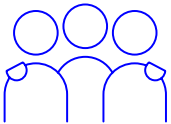
We also have on-net access to over **5,500 buildings** in Australia.



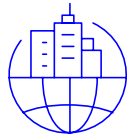
We operate **14 Data Centres** across Australia.



We have around **1,350 full-time, part-time and casual employees** in Australia.



We have around **970 team members in the Philippines**, who are employees of a Philippines-based third-party business partner engaged by Vocus to support a range of functions within our Retail business, including customer support, and some aspects of Vocus Network Services.



We engage more than **2,700 suppliers globally**. Our top 25 suppliers are based in Australia, United States of America, Finland and Germany. These suppliers account for approximately 80 per cent of our procurement spend.



Many of our suppliers have **extensive global manufacturing and supplier networks**. Source countries for goods that we procure include China, India and Brazil. The services we procure are largely provided in Australia, India and the Philippines.

Vocus is headquartered in Melbourne, Australia. We operate across all states and territories of Australia.



Our approach to addressing modern slavery

At Vocus, we do not tolerate any form of modern slavery practices in our operations or supply chain.

We support the protection of human rights as set forth in the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

In FY22, we established a Modern Slavery Action Plan (Action Plan), with the aim of strengthening our approach to modern slavery governance and due diligence. The Action Plan, and associated key performance indicators (KPIs), were endorsed by the Audit and Risk Committee of the Board, and our performance against them was overseen by the Committee throughout the year. The commitments we made, and our progress against them are outlined in the table below, and throughout this statement.

FY22 Commitments

FY22 Performance For more information:

Implement a supplier screening tool, in partnership with industry peers, to extend the scope and scale of our supplier screening process.		Page 11
Adopt software that will support our supplier screening and audit processes.		Page 11
Update the Vocus Procurement Policy to further clarify our expectations of our people with regard to identifying and mitigating modern slavery risks.		Page 9
Develop performance indicators to assist in managing the effectiveness of our management of modern slavery risks.		Page 7
Undertake a thorough update of our supply chain risk assessment.		Page 10



Underway



Completed

As a key deliverable within our Action Plan, this year we developed a set of KPIs to guide our ongoing modern slavery performance. These performance indicators were endorsed by the Committee, which also monitors ongoing progress against them.

Key Performance Indicator	FY22 Target	FY22 Performance	FY23 Target	FY24 Target	FY25 Target	For more information:
% of high-risk suppliers that have undergone a modern slavery screening	50	90	75	100	100	Page 10
% of new suppliers that have undergone a modern slavery screening	50	38*	75	100	100	Page 9
% of modern slavery incidents reported that were addressed within 90 days	100	N/A – no incidents reported	100	100	100	Page 2
Number of employees, contractors and suppliers who have received modern slavery risk training	20	30	200	700	1000	Page 11
% of supplier agreements that contain modern slavery risk controls	20	N/A**	40	75	100	Page 9
Number of supplier site visits	0	0	2	4	4	Page 14
Number of internal/external audits undertaken	0	0	2	4	4	Page 14

* As supplier screenings were performed manually during the reporting period, due to resource constraints we only reviewed suppliers with an expected spend of over \$20,000. This equated to 38 per cent of all new suppliers in FY22.

** Upon attempts to review our FY22 performance, we found that our contract repository tool did not allow us to extract data on the number of agreements that contain modern slavery risk controls. This issue has now been rectified, and we will report on this data going forward.

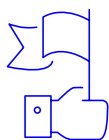
Our policies and governance framework

We have established a comprehensive framework of Corporate Governance policies that apply to all Vocus employees. The policies that are of particular relevance to modern slavery are our Code of Conduct, Procurement Policy, Grievance Policy and Whistleblower Policy, which have been established to maintain integrity and confidence in Vocus and appropriately safeguard the reasonable expectations of Vocus' key stakeholders.

The Vocus Board of Directors is responsible for approving the relevant Corporate Governance policies, as well as our annual Modern Slavery Act Statement. The Board Audit and Risk Committee has the ultimate oversight of our modern slavery approach and performance. At an operational level, the Chief Operations Officer, Chief People Officer and General Counsel & Company Secretary have ownership of the day-to-day management of modern slavery governance, risks and due diligence. Responsibility for procurement of goods and services sits within the remit of the Chief Operations Officer.

All Vocus employees are responsible for knowing and following our policies and governance frameworks, and living our core organisational values.

In FY21, we worked together with our industry peers through the Telco Together Foundation (TTF) to develop an Industry Statement on human rights and modern slavery. The initiative is an important step forward in our efforts to work collectively to eliminate these practices across our value chain, share best practices and explore ways to support victims. By signing this Statement we have committed to upholding the following principles, which draw on standards for business conduct set out in the UN Guiding Principles on Business and Human Rights:



1. We acknowledge and respect human rights in our operations and supply chains and understand the importance of identifying and addressing human rights impacts.



2. We seek to cooperate across our value chain, in areas where we can add more value than working independently; to identify issues, share insights, and continually learn.



3. We understand the complexity of supply chains and, subject to law, will undertake to share insights, aiming to increase transparency, visibility and facilitate cooperative responses.



4. We acknowledge the risk of modern slavery and harm to people as a key driver for business action, to be considered along with other risks such as financial, market, operational or reputational risk.



5. We recognise the importance of working in partnership with our suppliers to mitigate risks, supporting them in their efforts to address modern slavery in their own supply chains.

This year we continued to strengthen our modern slavery governance framework with the introduction of a Supplier Code of Conduct, and updates to our Procurement Policy.

Vocus' Supplier Code of Conduct sets out our minimum standards and expectations for all suppliers with whom we do business. It outlines these expectations with reference to human rights and labour practices, as well as modern slavery, and specifically requires that our suppliers "ensure there is no child labour, or forced, bonded or compulsory labour within any part of their business operations or supply chain and that the organisation is in no way benefitting from or contributing to any type of modern slavery". This Code of Conduct also provides details on how suppliers are able to confidentially report concerns about improper conduct in accordance with Vocus' Whistleblower Policy.

Vocus' Procurement Policy was also updated this year to clarify our expectations of our people with regard to considering, identifying and managing modern slavery risks. For example, during the procurement process, the responsible procurement lead must include a consideration of modern slavery risks in the selection process. These updates to our Procurement Policy were communicated and training was provided to all relevant team members.

In addition, we are working towards ensuring each new supplier or partner to Vocus undergoes a comprehensive modern slavery risk assessment during the onboarding process, which is reviewed to ensure that all third parties comply with our standards. Vocus suppliers are also required to agree to specific contractual arrangements with regards to compliance with the Modern Slavery Act 2018 (Cth). These can be found within the standard terms of our Master Services Agreement for all major suppliers, the Vocus tender terms for smaller suppliers and our onboarding process for new suppliers. The contractual provisions include an undertaking that the supplier does not engage in modern slavery and requires the supplier to promptly notify Vocus of any incident or allegation that it, or any entity in its supply chain has engaged in modern slavery. To test the effectiveness of these governance mechanisms, we included questions relating to these clauses in our supplier onboarding questionnaire, which is issued to all new suppliers.



Due diligence and risk management

The nature and extent of modern slavery means there is some inherent risk of its presence in the telecommunications industry's operations and supply chains; for example, in the working conditions of some contracted labour or the manufacturing and distribution processes of some products.

The nature of our business and location of our operations mean that our most material potential modern slavery risks exist within certain segments of our supply chain, and with respect to our contracted workforce in Manila, Philippines.

We consider the risk that our direct employee workforce could be subject to modern slavery to be low. We have made this assessment on the basis that our direct employees are highly skilled, working within a mature regulatory environment and undertaking largely office-based roles. Our direct employees are based in Australia and are provided with contracts that comply with relevant Australian employment legislation. They are also supported by established, embedded employment-related policies and processes.

Prioritised higher risk categories	Primary region of origin	Goods and services provided	Potential modern slavery risk factors
Network and ICT equipment	Asia, Europe	Equipment used to operate Vocus' networks and systems	Sector and industry risk Geographic risk
Construction	Australia	Network construction and maintenance in Australia	Sector and industry risk Labour intensity Low skilled labour
Business outsourced services	Philippines	Inbound and outbound sales teams, customer service, technical support, provisioning and credit control	Geographic risk

To help us to manage and mitigate potential modern slavery risks, we have implemented a range of programs and procedures to ensure the high labour management standards we expect are being met.

Modern Slavery Risk Assessment

This year we conducted a detailed risk assessment, through which we assessed where modern slavery risks have the greatest potential to arise across our operations and supply chain, by reference to recognised modern slavery risk factors, including high-risk sectors and geographies. As part of this process, we conducted a modern slavery risk assessment across our top 100 suppliers. These suppliers were selected based on overall spend – those selected represented 85 per cent of our overall procurement spend for FY22 – as well as industry risk factors, such as the provision of network equipment, construction and cleaning services.

We received responses to our initial questionnaire from 91 suppliers. Of these, responses from 66 were deemed satisfactory, seven were found to no longer be active Vocus suppliers and 18 remained on our residual risk register, pending further investigation. Suppliers remained on our residual risk list if they were exposed to the following higher-risk categories:

- Geographic risks: some countries are at higher risk of modern slavery practices due to weak governance and rule of law, conflict, corruption, displacement, state failure to protect human rights, migration flows and socio-economic factors like poverty or widespread discrimination.
- Sector or industry risks: some industries are recognised as high-risk globally and include extractives, textiles and fashion, fishing, electronics, cleaning and agriculture, the ICT sector and in Australia, the construction industry.

Our understanding of these risk categories was informed by reference to resources and information made available by organisations that include: The Global Slavery Index, the Freedom House List, KnowtheChain, Global Compact Network Australia, Australian Human Rights Commission, ILO 2020 List of Goods produced by Child or Forced Labor, Transparency International 2021 Corruption Perception Index, OECD Fragility Index, and Home Affairs' Addressing Modern Slavery in Government Supply Chains Toolkit.

We sent more detailed questionnaires to the 18 suppliers that remained on our residual risk list. This questionnaire required the suppliers to provide significant detail and evidence of their modern slavery risk management, due diligence and governance processes. In instances where this information was incomplete or suppliers were not forthcoming, we held follow up meetings to gain further insights and comfort in their approach.

We did not identify any material concerns regarding the management of modern slavery risks through our review process. We were ultimately satisfied with the performance of 80 of the 91 suppliers that responded to our initial questionnaire. There are nine higher risk suppliers that are still to provide us with a response to our residual-risk questionnaire, and another two that have actively engaged with the process but have not yet provided sufficient evidence to close out our assessment. We continue to engage with these suppliers to ensure their compliance with our expectations.

Supply chain due diligence

Our due diligence process begins with an initial risk profiling and screening process for potential new suppliers, and is continued through our annual Modern Slavery Risk Assessment, supplier screening process, and regular meetings with our tier one suppliers.

If modern slavery practices were suspected, alleged or identified in our supply chain, we would first work with our supplier to introduce clearly defined corrective actions, as well as process improvements and preventative measures to be implemented going forward. In future, we hope to drive this engagement jointly with our industry peers through TTF wherever possible, so that we can leverage our collective influence to encourage supplier engagement. If a supplier is not open to engaging with us, or committed to promptly implementing necessary corrective actions, business with the supplier will be terminated where possible.

We undertake due diligence in respect of modern slavery risks in our supply chain as an integral part of Vocus supplier risk and performance management process. This process includes a governance model that is tailored to the profile of each vendor in order to understand the criticality of the products and services they provide and the potential impacts in relation to modern slavery risks and supply chain disruptions.

To further strengthen our due diligence approach this year, we implemented a supplier risk management tool that will enhance our supplier onboarding, risk management and audit capabilities, and enable us to follow up on supplier screening more effectively. The tool will enable us to more easily identify upstream suppliers, zero in on specific risk verticals and automate some aspects of the risk assessment process.

To ensure our people are aware of their modern slavery obligations, we also launched new modern slavery training that was undertaken by 30 members of our Procurement, Legal, Risk, and People and Culture teams. The training included information on the types of modern slavery, as well as on how to identify and report on potential modern slavery risks and instances of modern slavery within our operations and supply chain.

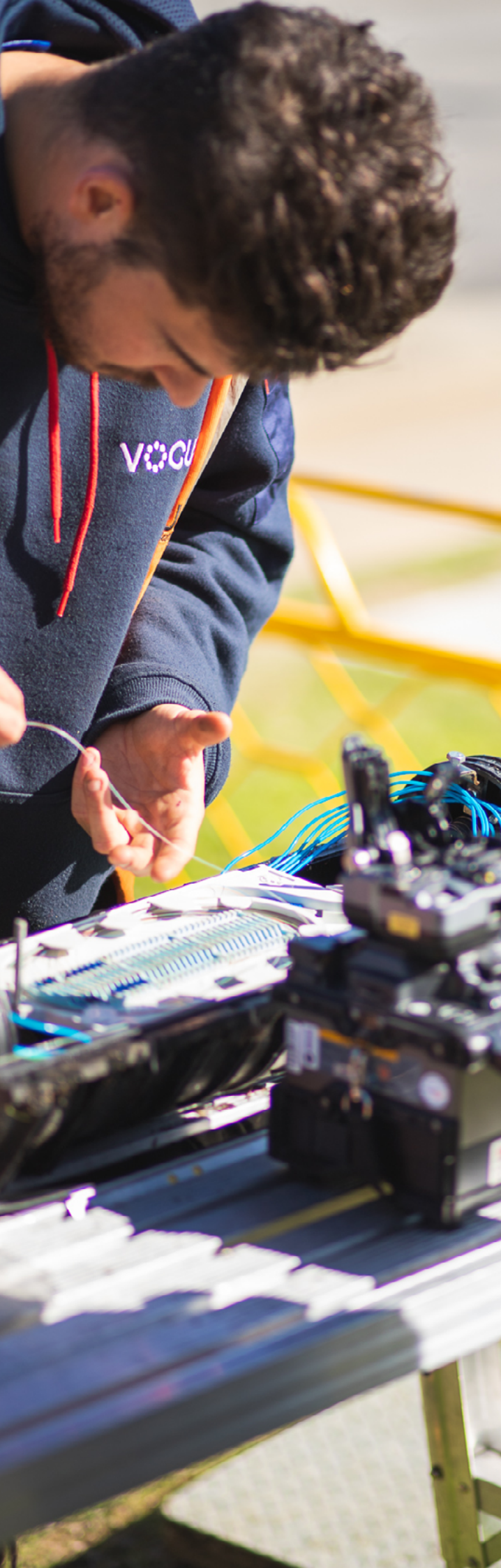
To help us to extend the number of suppliers we include in our supplier screening program in future years, we continued working together with TTF and our industry peers this year to implement a shared supplier screening platform. Due to factors outside our control, access to this tool was delayed, and implementation is expected to take place in early FY23. The platform supports the identification of modern slavery risks, supports efforts between suppliers and organisations to address those risks, improves transparency, and identifies areas for further due diligence.

Contract workforce due diligence

A range of functions supporting our Retail business, and some aspects of Vocus Network Services, are provided by a workforce in the Philippines that is employed by a third-party business process outsourcing partner (third-party partner). These functions include inbound and outbound sales teams, customer service, technical support, provisioning and credit control.

We maintain a close working relationship with our third-party partner in the Philippines. As the employer of our team there, they are responsible for developing and ensuring compliance with all relevant HR policies, in accordance with local laws. Our third-party partner is committed to action on modern slavery. They have a Modern Slavery and Responsible Procurement Policy, as well as a due diligence process in place to help manage potential risks across their operations and supply chain.

Our Philippines workforce undertakes annual compliance training to ensure they are aware of their rights and responsibilities in the workplace, and specific modern slavery training is undertaken as part of the new-starter induction process. To support the wellbeing of our team in the Philippines and to help implement our company culture, values, strategy and sales practices across our contract workforce, we employ a Vocus Country Manager, who is based in Manila.



Ensuring our effectiveness

Regular management reporting and Board Audit and Risk Committee oversight of our progress against our Modern Slavery Action Plan and KPIs, as well as annual Board reporting on the status and effectiveness of our governance framework and related Corporate Governance policies, play a key role in helping us to ensure the effectiveness of our management approach.

To ensure our people are aware of their rights and responsibilities under our governance framework, we conduct mandatory compliance training. This training is rolled out to all new employees, as well as contractors directly employed by Vocus. These groups also undertake refresher training every two years.

To assist in ensuring the effectiveness of our risk management approach, we monitor supplier completion rates of our risk-assessment questionnaire and also hold quarterly meetings with our Tier 1 suppliers, who account for approximately 80 per cent of our overall spend. We use these meetings to ensure our suppliers' compliance with our expectations regarding modern slavery, and to discuss their risk management approach.

We also have the opportunity to assess the effectiveness of our risk management approach at an industry level, through our membership of the TTF Modern Slavery Roundtable. This forum provides our industry with the opportunity to regularly come together to share best practices and adopt collaborative approaches to managing our potential modern slavery risks.

Grievance mechanisms

At Vocus, we ensure our people and stakeholders have access to a range of channels, both formal and informal, for raising issues that concern them. We are committed to thoroughly, objectively and fairly investigating all matters reported in a timely manner.

Controls are in place to ensure the effectiveness of our grievance mechanisms. The Vocus Board undertakes regular reviews of the Whistleblower Policy to ensure it remains appropriate and is operating effectively. Vocus' Chief People Officer undertakes regular reviews of our Grievance Policy and procedure, and oversees the Your Say channel. Regular communications are also issued reminding employees of the availability of these feedback and grievance mechanisms.

Whistleblower Policy

Our Whistleblower Policy is accessible via the Vocus website and intranet, and sets out the various channels through which Eligible Whistleblowers can make a disclosure. We also communicate our Policy to our suppliers via our Supplier Code of Conduct. Vocus employees, contractors, suppliers, and their families are all defined as Eligible Whistleblowers, as are the employees of Vocus third-party contractors or suppliers. Accordingly, genuine concerns about unethical conduct within the Vocus supply chain may be reported under the Whistleblower Policy, if other avenues are not successful.

Our Whistleblower Policy affords Eligible Whistleblowers anonymity, confidentiality and protection from detriment, in instances where they are reporting potential wrongdoing or inappropriate conduct. Once a disclosure is received by the appropriate Disclosure Officer, Vocus will investigate whether the disclosure qualifies for protection under the Policy, and whether a formal, in-depth investigation is required. The disclosure may be referred to the Vocus Ethics Committee for consideration and investigation and, if required, an external independent investigator may be engaged.

Along with making our Whistleblower Policy available to all new Vocus suppliers as part of our onboarding process, we have processes in place to check whether our suppliers and sub-contractors operate their own whistleblowing processes; how their processes are actively promoted within their organisations; and how any breaches or suspected breaches are reported.

Vocus' Whistleblower Policy is publicly available at the following link: <https://www.vocus.com.au/legal/corporate-governance>.

Grievance Policy

Our Grievance Policy provides our people, as well as Vocus customers and visitors to our sites, with a formal mechanism to help address and resolve grievances in a way that is fair, reasonable and timely. The Policy is available via our intranet and sets out a procedure by which concerns can be raised, investigated and resolved.

Your Say

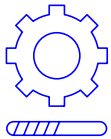
Your Say is an informal mechanism through which team members are encouraged to ask questions, make suggestions and raise concerns directly with Vocus' People and Culture team. All queries are addressed by a member of the People and Culture leadership team.

Vocus' General Counsel & Company Secretary and/or Chief People Officer may also occasionally receive ad hoc complaints or grievances directly. When this occurs, they thoroughly investigate any allegations objectively and fairly, and report back to interested parties in a timely manner on the outcome of the investigation.

During FY22 no Whistleblower reports or grievances were raised via any of these channels in respect of modern slavery issues.

Looking forward

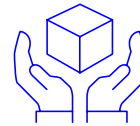
In the coming year, our focus will be on meeting our FY23 modern slavery KPIs, which we will achieve by undertaking the following actions:



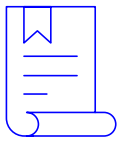
Implementing a new supplier screening tool, in partnership with our industry peers, and using this tool to expand our modern slavery assessment to a larger group of suppliers.



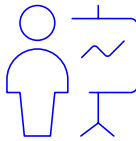
Undertaking at least two initial supplier site visits and audits.



Increasing the number of new suppliers that undergo a modern slavery screening to 75 per cent.



Ensuring at least 40 per cent of our supplier agreements contain modern slavery risk controls.



Providing targeted modern slavery training to at least 200 Vocus employees, contractors and suppliers.



Approval

This Modern Slavery Act Statement was approved by the Board of Directors on 5 December 2022 and is signed on its behalf by the Chief Executive Officer and Chair of the Board.



Mr Kevin Russell
Chief Executive Officer



Ms Penny Bingham-Hall
Chair of the Board

Appendix:

How our Statement addresses the mandatory reporting criteria

Modern Slavery Act requirement	Reference in this statement
Identify the reporting entity	Introduction, page 2
Describe the reporting entity's structure, operations and supply chains	Our structure, operations and supply chain, page 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	Due diligence and risk management, page 10
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	Our approach to addressing modern slavery, page 6 Our policy and governance framework, page 8 Due diligence and risk management, page 10 Grievance mechanisms, page 13
Describe how the reporting entity assesses the effectiveness of these actions	Ensuring our effectiveness, page 12
Describe the process of consultation with any entities the reporting entity owns or controls	Our structure, operations and supply chain, page 3 (All staff are employed by Vocus and report to the same executive management team)
Provide any other relevant information	Looking forward, page 14

