

Vocus Human Rights Policy

May 2023

Introduction

At Vocus, our Purpose statement reflects who we are and what we do: “Building critical connections. Enabling better possibilities.” We believe connectivity should enable potential and that as a company, we are in a position to enable better possibilities for our people, our customers and for society through the critical connections that we build.

The commitments and expectations set out in this policy are fundamental to delivering on our Purpose.

At Vocus, we recognise our role in respecting human rights.

We acknowledge we can impact human rights either directly, through our business operations, or indirectly, through our business and supplier relationships. Our most material potential impacts include the rights of our employees, the rights of workers in our supply chain, rights to privacy, and the rights of people in communities where we operate.

Our human rights commitments

At Vocus, our approach to respecting human rights is based on the following commitments:

- Respecting and supporting the protection of human rights as set forth in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.
- Ensuring safe, fair and healthy working conditions for our employees and contractors, in compliance with applicable laws and regulations. We are committed to keeping our people safe, and supporting their wellbeing.
- Building a diverse and inclusive workplace where our people experience better possibilities, and feel like they belong. We strive to create an environment where every team member feels safe to share their own unique capabilities, experiences and perspectives. We do not tolerate bullying, harassment, victimisation, abuse, or unlawful discrimination.
- Not tolerating modern slavery practices in any form in our operations or supply chain, such as child labour, forced, bonded or compulsory labour. For further information on our approach to addressing modern slavery, please see our most recent Modern Slavery Act Statement.
- Not tolerating bribery, corruption or unethical behaviour of any kind, as set out in our Code of Conduct and Anti-Bribery and Corruption Policy.
- Engaging in open and constructive dialogue with our employees and respecting their rights of freedom of association and collective bargaining.
- Respecting the right to privacy of our customers and employees and taking appropriate steps to protect their personal information.
- Respecting the human rights of people in communities that may be affected by our activities. We are committed to engaging with relevant parties to understand the implications of our activities; respond to concerns, work to enhance benefits and mitigate any negative impacts.
- Acknowledging the UN Declaration on the Rights of Indigenous Peoples and recognising Aboriginal and Torres Strait Islanders as the Traditional Owners and custodians of country throughout Australia, and respecting their ancient and enduring connection to land, sea and community.

Implementing our commitments

We focus our efforts on our most salient human rights impacts. We recognise that we need to assess and address human rights impacts in our operations and supply chain through ongoing due diligence.

At Vocus, we respect human rights through our corporate policies, processes and initiatives, and broader governance and stakeholder management approaches. Policies and other documents that reflect our commitments include our:

- Vocus Code of Conduct
- Supplier Code of Conduct
- Equal Employment Opportunity & Anti-Discrimination Policy
- Bullying & Harassment Policy
- Diversity & Belonging Policy
- Anti-bribery & Corruption Policy
- Workplace Health & Safety Policy
- Privacy Policy

All Vocus employees are responsible for knowing and following our policies and living our core organisational values. We will communicate our commitment to human rights and provide training to relevant employees on human rights-related issues, such as modern slavery.

We also recognise that collaborating is the most effective way to make progress on complex social issues. Information on how we work with others to address global rights-based issues is provided in our most recent Modern Slavery Act Statement.

Our expectations

We expect everyone who works at Vocus to respect and uphold human rights within our business, and to report any potential human rights issues they identify, as they arise. We expect our suppliers to demonstrate their respect for human rights, by meeting the expectations set out in our Supplier Code of Conduct.

Raising concerns

We want to know about any human rights concerns. We expect our team members to report any human rights concerns to their manager, or our People & Culture team.

Suppliers can raise concerns with their supplier relationship point of contact or via email to: procurement@vocus.com.au

Alternatively, Vocus' employees, contractors, suppliers and other eligible persons can confidentially report concerns in accordance with Vocus' Whistleblower Policy. The Policy sets out how Vocus will support eligible whistleblowers to understand how to express concerns, know who to contact, make a report and the protections available. This policy is available at: <https://www.vocus.com.au/about-vocus/corporategovernance>

We are committed to thoroughly, objectively and fairly investigating all matters reported in a timely manner. We will provide, or cooperate in providing, appropriate remediation where we have caused or contributed to adverse human rights impacts. If we identify adverse human rights impacts in our supply chain, we may not immediately terminate the relationship, but seek to work with the supplier to remedy the impact.

Governance

This policy has been approved by the People and Remuneration Committee of the Vocus Board. The policy will be reviewed every two years, or as required if there are material changes to our business, value chain or related regulatory frameworks.