Modern Slavery Statement 2025

VOCUS

About this statement

Modern slavery, including trafficking, forced labour, debt bondage and child labour, is a severe violation of human rights. We are committed to taking meaningful action to identify, assess, and address modern slavery risks within our operations and supply chain.

Vocus Group Limited (Vocus) is a reporting entity as defined by the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement (Statement) is made on behalf of Vocus and its subsidiaries for the financial year ending 30 June 2025.

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

This Statement details actions taken to identify and mitigate the risk of modern slavery. Our efforts encompass thorough risk assessment and due diligence processes, involving engagement with stakeholders across our value chain. We strive to create a culture of transparency and accountability, ensuring we respect and promote human rights with our employees, suppliers and partners.

As detailed within this statement, the scope of Vocus' operations and supply chain has changed significantly since the end of the FY25 reporting period, due to the acquisition of TPG's Enterprise, Government and Wholesale fixed business and fibre network assets on 1 August 2025. As this acquisition took place in early FY26, the breadth of our expanded operations, supply chain and workforce are not captured within the scope of this year's Modern Slavery Statement. Consideration of any potential modern slavery risks associated with our newly acquired operations will, however, be fully integrated into our approach, progress and disclosures for FY26.

In line with our commitment to continuous improvement, this year we have taken the opportunity to clarify our reporting of high-risk supplier exposure. In FY24, our reported spend with high-risk suppliers excluded non-procurement managed suppliers, as well as non-respondents to our modern slavery questionnaire. In FY25, we have addressed this by broadening our risk assessment to include all suppliers, and conducting a desktop assessment of non-respondent suppliers to provide a more accurate assessment of our overall risk exposure within the business. For more information, see the Due Diligence Processes section of this Statement.

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

Message from our Chair and CEO

At Vocus, we work with our stakeholders to embed ethical business considerations across our value chain – from the way we procure products and services, to the way we support and protect the interests of our workforce.

We stand against modern slavery in all its forms. We are committed to implementing robust governance, risk management and due diligence processes to support us to identify and address these practices if they occur, and to creating a culture that encourages our people and partners to raise potential concerns. We are also focused on building relationships with our customers, partners and suppliers across our value chain, to ensure we are operating with respect for human rights and taking the steps necessary to identify and mitigate any shared risks.

This Modern Slavery Act Statement - Vocus' sixth - outlines the further steps we've taken throughout FY25 to enhance due diligence, strengthen our supplier oversight, and embed human rights into how we do business.

This year we consolidated our supplier management approach into a unified framework, enabling us to extend our risk assessment and due diligence processes to business unit-managed suppliers for the first time. This shift has increased our supply chain visibility and control, enabling us to better identify and mitigate modern slavery risks across our supply chain.

We also extended our approach to supplier due diligence by establishing formal supplier management plans with our high-risk suppliers. Of those introduced in FY25, more than half of the recommended actions have already been completed. These efforts reflect our commitment to not only identifying risk but driving meaningful change.

No instances of modern slavery were identified during the reporting period. While this is encouraging, we recognise that modern slavery remains a complex and evolving risk. We remain committed to ongoing vigilance, continuous improvement, and the integration of modern slavery considerations into business-as-usual risk management.

Looking ahead, integrating TPG's fibre assets and Enterprise, Government and Wholesale fixed business into Vocus will expand the scale and complexity of our operations and supply chain, including new geographies, suppliers, and service models not yet subject to Vocus' modern slavery screening. We will undertake a thorough evaluation of our expanded supply chain and embed governance and due diligence across the combined business to ensure human rights are respected and supported across our expanded operations.

We thank our teams, suppliers, and partners for their continued commitment and collaboration as we advance this important work. Together, we remain dedicated to responsible, accountable business practices and ensuring human rights remain at the core of everything we do.

Andrés Irlando, Chief Executive Officer

Mark Cross, Chair of the Board

Organisational structure, operations and supply chain

Our organisation

As at 30 June 2025:

We own and operate a **27,000 km fibre network** across Australia and subsea, purpose-built and managed for business, wholesale and government customers.

We operate **15 Data Centres** across Australia.

We have over **675,000 consumer customers** across our in-market brands: Dodo and iPrimus with **~924,000 services in operation.**

We employ **1,415 people** in full-time, part-time, or contract roles in Australia. Of these, **97% are permanent employees.**

We have around **950 team members in the Philippines,** employed by a third-party partner, providing a range of functions, including consumer customer support and back-office operations.

Our operations

As a leading specialist fibre and network solutions provider, we own and operate approximately 27,000 kilometres of secure, high-capacity fibre connecting all Australian mainland capitals, as well as connections to New Zealand, Asia and the USA. Our network includes the Australia Singapore Cable (ASC) from Perth to Singapore via Indonesia, the North-West Cable System (NWCS) from Port Hedland to Darwin, and the connection between the NWCS and the ASC to form the Darwin-Jakarta-Singapore Cable system (DJSC). These cables are monitored 24/7 by our Operations Command Centre facility located in Melbourne.

We own a portfolio of well-recognised telecommunications brands that provide services to enterprise, government, wholesale, small business and residential customers across Australia. Our primary go-to-market brands, as at 30 June 2025, are shown below.

Consumer

dodo iPrimus

Vocus Network Services

VOCUS VISION NETWORK

Through our Dodo brand, we also supply electricity and gas to residential customers. The electricity we supply these customers is sourced from the grid via the Australian Electricity Market Operator, and the gas we supply is purchased from upstream suppliers; we do not own any generation or distribution assets.

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

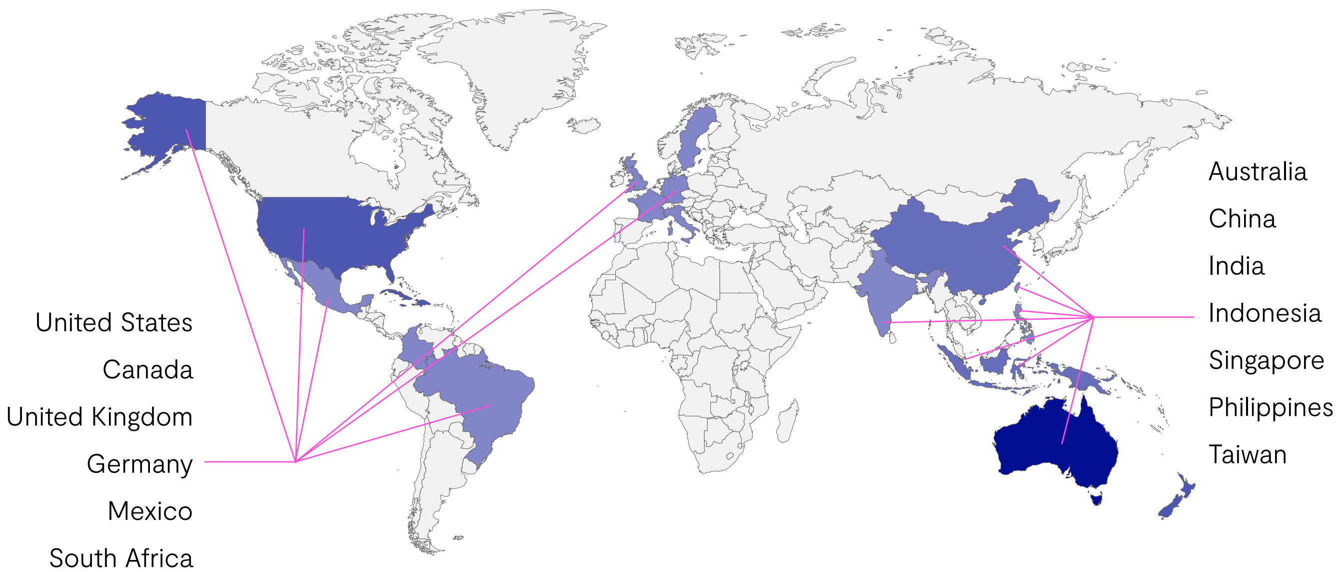
Our supply chain

Vocus has a large and diverse global supply chain that we use to build and operate our network, support our business operations and serve our customers. We aim to develop strong supplier relationships that create long-term, sustainable value for our customers, shareholders, partners and stakeholders in the community.

> In FY25, we engaged 2,020 suppliers worldwide.

The supply chain map below illustrates the countries where our suppliers manufacture or purchase the goods and services they provide to us, based on supplier survey responses. The colour scale reflects the number of suppliers we have in each location.

In FY25, 79 per cent of our third-party spend was from suppliers based in Australia. We acknowledge that our suppliers often maintain extensive global manufacturing and supplier networks, and modern slavery risks within our supply chain extend beyond the suppliers with whom we directly contract. Notably, source countries for goods we procure include China, India and Taiwan, while services are predominantly provided from Australia, China, India and the Philippines. Recognising material risks in our supply chain is crucial for building more transparent and responsible operations, ensuring that Vocus is not a contributor to human rights violations.



Our progress

We are dedicated to continuously improving our practices and policies to combat modern slavery.

Each year we implement a Modern Slavery Action Plan, to support delivery against our Modern Slavery KPIs. Our progress and performance against our key commitments and KPIs is overseen by the Audit and Risk Committee throughout the year and is outlined in the tables below.

The first table outlines our FY25 commitments, detailing the specific actions we pledged to undertake and our performance against them. The second presents our FY25 KPIs, which quantify our performance and help assess the effectiveness of our approach.

Together, these tables provide a comprehensive view of our efforts to address modern slavery risks across our operations and supply chain throughout FY25. Additional context and commentary are provided throughout this statement to support and elaborate on the data presented.

FY25 Modern Slavery Action Plan Commitments	FY25 Performance	For more information
Continue to embed Vocus' commitment to respect human rights across the organisation	Achieved	Page 8
Engage with industry to drive both operational and cultural change to reduce instances of modern slavery throughout the telco supply chain network	Achieved	Page 18
Continue to assess our operations and supply chain to identify any modern slavery risk factors	Achieved	Page 13
Continue to undertake modern slavery screening of all new suppliers	Achieved	Page 13
Ensure all new or renegotiated supplier agreements contain modern slavery risk controls	Achieved	Page 13
Work with suppliers to investigate potential violations and if substantiated, support suppliers to take action to remediate any identified human rights violations or instances of modern slavery	Not applicable	No potential violations identified throughout the reporting period
Determine feasibility of providing modern slavery risk awareness training to our suppliers who do not currently have a training program in place	Achieved	Page 14
Undertake assessment of Vocus' modern slavery grievance mechanisms against best practice	Achieved	Page 12
Define effectiveness measures and metrics and develop framework to monitor and report	Achieved	Page 19
Undertake supplier site visits/audits, as required based on the outcomes of the risk assessment process	Not applicable[1]	Page 16

FY25 Modern Slavery Action Plan KPIs	FY25 Performance	For more information
Provide targeted modern slavery training to at least 1000 Vocus employees, contractors and suppliers	Achieved	Page 17
Increase the number of new starters that undergo modern slavery awareness training to 100%	Partially achieved – 81% of new starters completed training	Page 17
Maintain the number of potentially high-risk suppliers that undergo a modern slavery risk assessment at 100%	Achieved	Page 13
Maintain the number of new suppliers that have undergone a modern slavery screening at 100%	Achieved	Page 13
Increase the number of new supplier agreements that contain modern slavery risk controls to 100%[2]	Achieved	Page 13
Increase the number of modern slavery management recommendations completed by suppliers (within agreed timeframes) to >50%	Achieved	Page 16

1. In FY25, we decided not to conduct supplier site visits or audits as we determined we would engage our potentially high-risk suppliers to develop tailored action plans, designed to support them to uplift their modern slavery risk management approach. Once these action plans have been implemented, as determined through regular engagement, we will identify suppliers that warrant a deeper assessment through site audits. More information on this can be found on page 16.
2. This metric applies only to new or renegotiated contracts valued at $50,000 or more and does not cover contracts where Vocus cannot negotiate terms.

Modern slavery risks

We define 'modern slavery risks' as the potential for our business to cause, contribute to, or be directly linked to modern slavery, in line with the UN Guiding Principles on Business and Human Rights. 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.

Identified modern slavery risks in our operations

Vocus acknowledges the potential exposure to modern slavery risk within our operations. However, we consider the risk of our direct employees being subject to modern slavery to be negligible. We have made this assessment on the basis that our direct employees are highly skilled, work within a mature regulatory environment and undertake largely office-based roles. Our direct employees are based in Australia and are provided with contracts that comply with relevant Australian employment legislation and are supported by established, embedded policies and processes to ensure a safe and fair working environment. We are focused on creating an environment where our people can grow and thrive.

Given the nature of our business and the location of our operations, the most significant risk from an operational perspective lies with our contracted workforce in Manila, Philippines. Further information on how we manage this risk is provided on page 16 of this statement.

High-risk business operations and business models

Business outsourced services

Vocus has a service agreement in place that outsources inbound and outbound sales teams, customer service, technical support, provisioning and credit control services to an offshore business partner in Manila, Philippines. Vocus has identified that this workforce are at higher risk of potential modern slavery practices based on their geography, and vulnerable populations.

Contingent workforce

Vocus' contingent workforce is comprised of full-time and part-time maximum term contract workers who provide services at times of high demand.

Vocus' contingent workforce is comprised of both highly skilled specialists and base-skill workers. Base-skill workers can be at higher risk of modern slavery due to increased vulnerabilities.

Customers

Vocus' core business involves providing telecommunications services to customers. If any of our customers engage in practices resembling slavery, Vocus could be associated with these practices through the provision of our services. There is also a potential for relationships with individuals or entities involved in modern slavery practices within their operations or supply chains, particularly when we have limited insight into an entity's business model.

Memberships and associations

Vocus participates in several business associations to collaborate, build relationships, and support industries. However, these memberships also pose a risk of association with modern slavery if third parties are high-risk and lack due diligence.

Identified modern slavery risks in our supply chain

Vocus recognises the inherent risks of modern slavery present in our procurement of goods and services. Each year we undertake an inherent risk assessment that takes into consideration country risk and category risk, as well as each suppliers' criticality to our business.

Inherent risk assessment considerations

Country risk	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.
Category risk	Assessed against several factors, including labour intensity, skill level, and the presence of migrant or sub-contracted workers.
Critically	Where a supplier is deemed critical to Vocus' operations or spend is above $50,000 per annum.

Our understanding of these inherent risk factors is informed by reference to multiple sources of information, including media reporting and resources made available by organisations that include The Global Slavery Index, the Freedom House List, KnowtheChain, Global Contact Network Australia, Australian Human Rights Commission, ILO 2022 List of Goods produced by Child or Forced Labor, Transparency International 2022 Corruption Perception Index, OECD Fragility Index, and Home Affairs' Addressing Modern Slavery in Government Supply Chain Toolkit.

We have assessed that our procurement of Network and IT equipment, products and services relating to the construction and maintenance of telecommunications networks, as well as cleaning services, represent potentially higher-risk categories for our business.

While our activities relating to network construction, maintenance, and cleaning services are based in Australia, which is considered relatively low risk in terms of modern slavery on a geographic basis, we acknowledge that workers in these sectors can still be vulnerable to exploitation.

The following table outlines these higher-risk categories:

ICT Sector / Network and IT equipment	This includes equipment used to operate Vocus' networks and systems. It presents sector and industry risks due to the complexity of global supply chains and the potential for exploitative labour practices in manufacturing and distribution.
Cleaning services	Workers in the cleaning services industry can be from populations with heightened vulnerability to modern slavery, including low-wage workers and workers from migrant, low socio-economic, or culturally and linguistically diverse backgrounds.
Network construction and maintenance	We recognise that workers in the construction and maintenance sectors can be particularly vulnerable to exploitation due to factors such as the high demand for low-skilled labour force, tight project deadlines, and the complexity of monitoring long and intricate supply chains. To address these risks, we have implemented a rigorous system for onboarding and establishing safety standards with our contractors. All contractors, including their workers and subcontractors, must comply with Australian National Employment Standards. Additionally, they are required to complete online workplace health and safety (WHS) induction and refresher training. We conduct monthly audits of our contractors to ensure adherence to WHS standards and to evaluate their performance.

Our risk analysis also identified that modern slavery risks could also arise in other areas of our supply chain that are not as material with respect to our spend, such as marketing merchandise, garments and personal protective equipment, catering services, waste management, physical security services, transport and solar panels. These risks arise from involvement of base-skilled workers susceptible to exploitation or goods and services originating from higher-risk countries.

To manage and mitigate these potential modern slavery risks, we have implemented a range of programs and procedures to ensure adherence to the labour management standards we expect, as outlined in the 'Due Diligence Processes' section of this Statement.

Modern slavery risk management framework

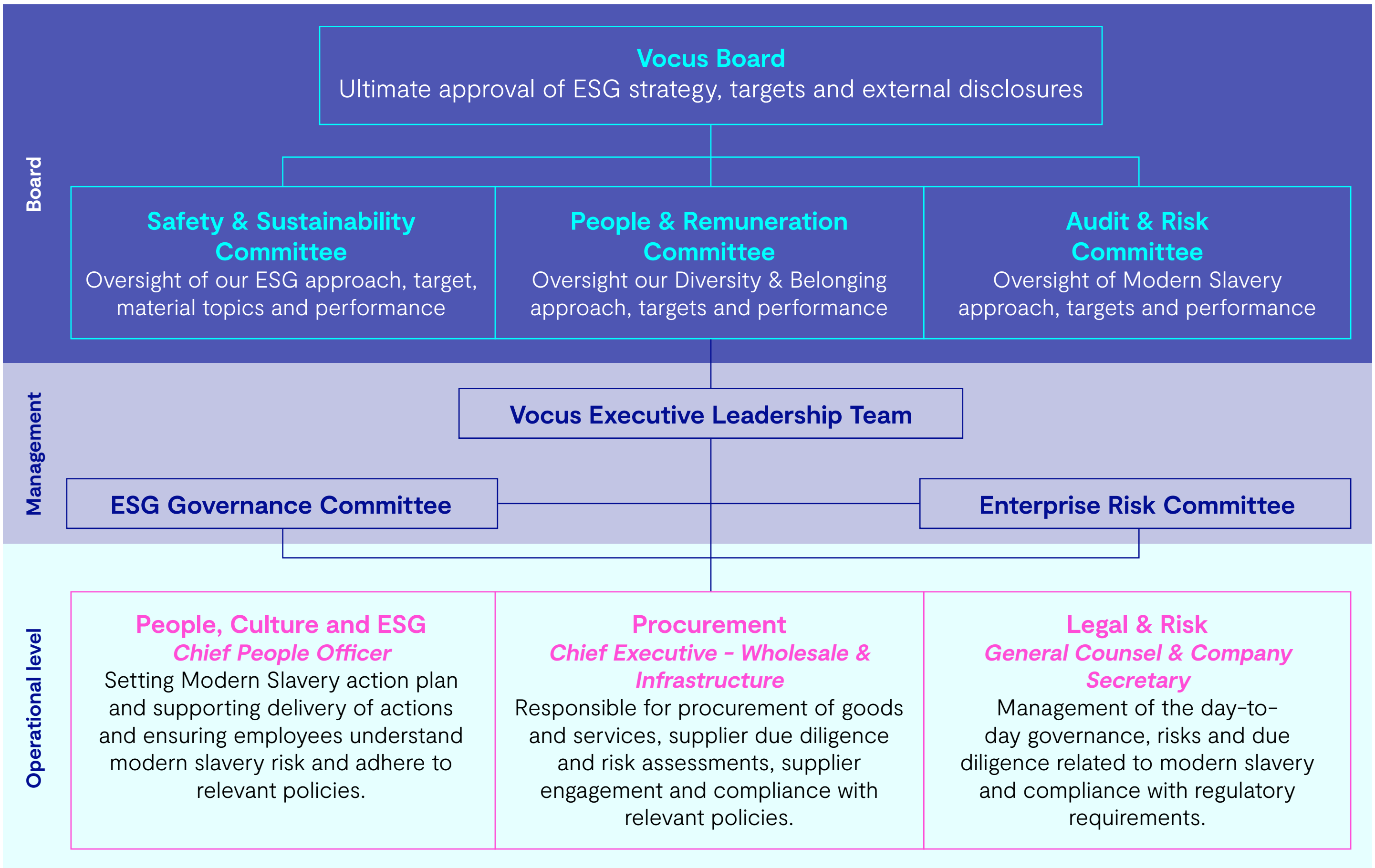
Governance framework

We have established a comprehensive framework of Corporate Governance policies that apply to all Vocus directors, executives and employees. The policies particularly relevant to modern slavery include our Human Rights Policy, Code of Conduct, Supplier Code of Conduct, Procurement Guidelines, Grievance Policy and Whistleblower Policy. These policies are designed to maintain integrity and confidence in Vocus and appropriately safeguard the reasonable expectations of our people and suppliers.

Board oversight and management responsibility

The Vocus Board of Directors is responsible for approving related Corporate Governance policies and our annual Modern Slavery Act Statement. The Board Audit and Risk Committee oversees our modern slavery approach and performance, ensuring that modern slavery risks are assessed and managed in line with our enterprise-wide Risk Management Framework. Further details on our Risk Management Framework can be found in Vocus' ESG Report, available on our website.

At an operational level, in FY25 the Chief Executive – Wholesale & Infrastructure, Chief People Officer and General Counsel & Company Secretary managed the day-to-day governance, risks and due diligence related to modern slavery. The Chief Executive – Wholesale & Infrastructure is specifically responsible for the procurement of goods and services.



Policies and procedures

Our Human Rights Policy includes a specific commitment to not tolerate modern slavery practices in any form in our operations or supply chain, such as child labour, forced, bonded or compulsory labour. Our Human Rights Policy also highlights that we expect our suppliers to demonstrate respect for human rights, by meeting the expectations set out in our Supplier Code of Conduct. The Policy encourages reporting of any human rights concerns. Reports can be made using internal reporting channels, as well as in accordance with our Whistleblower Policy. Our Human Rights Policy is publicly available on Vocus' website, as well as via our internal communication platform and company intranet.

Our Code of Conduct sets expectations for fair, ethical behaviour that is consistent with our values and in accordance with all laws and regulations relevant to our operations.

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". It also provides details on how suppliers can confidentially report concerns about improper conduct in accordance with Vocus' Whistleblower Policy. The Supplier Code of Conduct is published on Vocus' website.

Vocus' Procurement Guidelines sets out our expectations of our people regarding consideration of environmental and social performance in our supply chain and reinforces the requirement for all suppliers and partners to comply with the Supplier Code of Conduct. The Guidelines are published on our internal communications platforms.

Vocus' standard contract terms specifically address modern slavery and are available on our website. The contractual provisions in Vocus' standard Supplier Agreement 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. These standard contract clauses are communicated to suppliers during the onboarding process.

All Vocus employees are expected to understand and adhere to the policies and governance frameworks relevant to their roles, embody our core organisational values, and report any suspected breaches of law or our Code of Conduct.

Grievance mechanisms and remediation

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 providing, or cooperating in, appropriate remediation where we have caused or contributed to adverse human rights impacts. This commitment is set out publicly in our Human Rights Policy. 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. 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.

Controls are in place to ensure the effectiveness of our grievance mechanisms. The Vocus Board, in consultation with the General Counsel & Company Secretary, 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.

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. 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.

To support eligible whistleblowers to make a disclosure, we have an anonymous, third-party whistleblower hotline in place. The hotline is available free of charge to all Vocus employees, contractors, suppliers and their families.

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 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.

We undertake fortnightly employee engagement pulse-checks, which is also a mechanism through which team members can anonymously raise concerns. Vocus' General Counsel & Company Secretary and/or Chief People Officer may also occasionally receive ad hoc complaints or grievances directly. When this occurs, any allegations are investigated objectively and fairly, and interested parties are informed in a timely manner on the outcome of the investigation.

Due diligence processes

We implement thorough due diligence to identify and mitigate potential modern slavery risks as part of our comprehensive supplier risk and performance management process. This process includes a governance model tailored to each vendor's profile to understand the criticality of their products and services and their potential impacts on modern slavery and supply chain disruptions.

During FY25, Vocus made significant improvements to our supplier management framework, strengthening oversight of modern slavery risks throughout our supply chain. Historically, suppliers were grouped into two categories: those managed by the central procurement team and those managed directly by business units. All procurement-managed and new suppliers, undertook an annual modern slavery risk screening using Vocus' supplier management tool, tailored to their specific risk profiles.

Some suppliers, including carriers, third-party data centres, and energy providers, had traditionally fallen outside the direct oversight of procurement, as the commercial relationships were managed from within our business units. These suppliers are typically larger entities where procurement influence is limited, and invoicing is led by the supplier. As a result, they were previously excluded from procurement-led processes and not included in the Modern Slavery Management Framework.

In FY25, we took steps to address this gap by extending procurement processes to include these previously excluded suppliers in our modern slavery risk screening. Even though these suppliers continue to be managed at the business unit level, they are now also subject to our Modern Slavery Management Framework. This means that every supplier is now assessed by our procurement team for modern slavery risks based on factors such as product or service category, country of origin, and business criticality. This approach ensures that onboarding, risk assessment, and modern slavery screening processes are consistently applied across our full supplier base, increasing transparency and strengthening supply chain risk management. The data in the remainder of this report reflects this consolidated approach, noting that business unit-managed suppliers represent 76 per cent of Vocus' total supplier spend.

Certain supplier contracts do not adhere to our standard contractual terms – which place modern slavery obligations on our suppliers - due to their significant market influence, which allows them to dictate terms. As a result, historically they have not always included modern slavery clauses. We are therefore working to ensure that we negotiate for modern slavery clauses to be added to contractual agreements with all new suppliers, as well as when existing agreements are renegotiated. Of the eligible supply agreements that Vocus entered into during FY25, 97 per cent contain modern slavery risk controls. The remaining agreements are awaiting execution, and once completed, our target of 100 per cent inclusion is expected to be met.

Assessing modern slavery risks in our supply chain

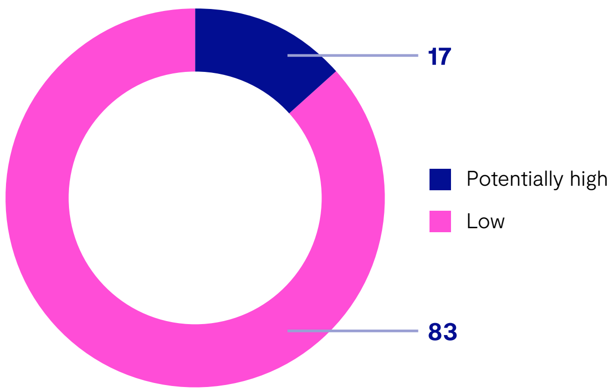
In FY25, all 2,020 Vocus suppliers were assessed through our modern slavery screening and risk assessment process to ensure they have the modern slavery governance and due diligence processes in place to meet our performance expectations, as outlined in our Supplier Code of Conduct

Inherent risk assessment

Each year we undertake an inherent risk assessment to assess the risk of modern slavery practices within our supply chain. We continue to broaden the scope of this assessment and in FY25, we extended it to our full supplier base. We classified each of our suppliers as either low or potentially high-risk for modern slavery, based on industry and geographic factors, as well as their criticality to our business.

Throughout FY25, 349 suppliers were identified as potentially high-risk based on our inherent risk assessment, representing 17 per cent of all suppliers.

Supplier inherent risk rating (%)



This represents a 31 per cent year-on-year increase in the overall number of high-risk suppliers, which was driven by two key factors:

1. The inclusion of business unit-managed suppliers in the screening process for the first time
2. Increased expenditure in higher-risk categories such as third-party data centres and carriers, both domestic and international

While the majority of our business unit suppliers are based in Australia, and therefore do not pose a geographic risk, many operate within the ICT sector, which is associated with complex and often opaque supply chains. These characteristics heighten the difficulty of detecting modern slavery risks, which increases the inherent risk rating of the sector and underscores the importance of targeted due diligence and enhanced oversight.

Residual risk assessment

Following the inherent high-risk assessment, we undertake a residual risk assessment to determine the level of modern slavery risk that remains once a supplier's management practices and mitigation measures have been considered. This process involves several steps, including supplier questionnaires, desktop assessments, and engaging directly with suppliers to validate and strengthen our understanding of their risk profile.

Modern slavery questionnaire

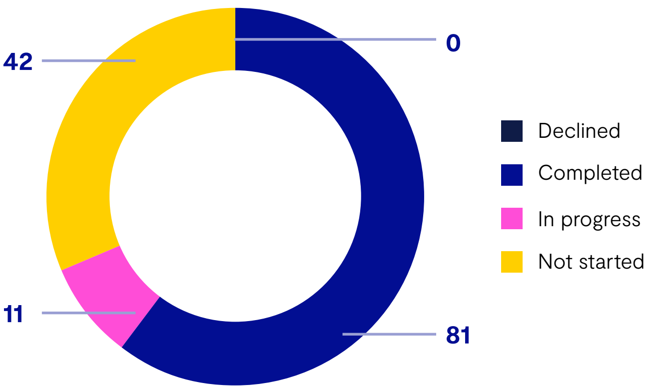
Throughout FY25, we reached out to 134 of our 349 potentially high-risk suppliers to issue modern slavery questionnaires. We undertake our residual risk assessment process when we first onboard suppliers, and then on an annual basis at the start of each financial year. The number of suppliers contacted each year is influenced by the timing of the assessment, as some suppliers' risk ratings are updated to potentially high-risk after the questionnaires have been distributed. All potentially high-risk suppliers who did not receive our FY25 questionnaire, or did not respond to it, were subject to a desktop assessment of their public disclosures, to provide us with a preliminary residual risk rating. Recognising the limitations of indirect engagement, these suppliers will be issued our questionnaire in FY26.

The 134 suppliers we issued the questionnaires to comprised of:

- Eleven new suppliers
- Seventy-five procurement-managed suppliers
- Forty-eight business unit-managed suppliers

The questionnaires requested detailed information and supporting evidence regarding each supplier's modern slavery risk management, due diligence, and governance processes.

Questionnaire completion rate



Throughout FY25, 81 suppliers completed a modern slavery questionnaire. Based on their responses, 74 suppliers had their risk ratings reduced as they provided sufficient evidence that they were effectively managing their modern slavery risks. Seven suppliers remained classified as potentially high-risk after completing the questionnaire – three of which were newly identified, and four of which had already been identified as high-risk through our FY24 assessment.

From the responses we received, we identified the following trends:

High spend suppliers had lower residual risk ratings when compared to lower spend suppliers, as these usually represented larger companies with more robust governance mechanisms in place.

Construction, maintenance and repair operations remains our highest risk procurement category due to the nature of work and workforce composition.

Smaller suppliers were less likely to have the governance, risk management and due diligence systems in place to appropriately manage modern slavery risks, representing an opportunity for Vocus to provide additional uplift support in FY26.

Many suppliers do not currently provide modern slavery training to their employees. There is an opportunity for Vocus to provide training modules to smaller suppliers to improve modern slavery awareness across our supply chain.

We acknowledge there are limitations to surveys as suppliers may overstate the maturity of their modern slavery controls or omit information about higher-risk worker demographics, operational and supplier locations, or past labour rights violations. We address this through our supplier management tool, which conducts ongoing screening to identify organisations that are subject to sanctions, watch lists, or negative media attention. All suppliers are subject to this process.

Desktop assessment

We supplemented our initial residual risk assessment with a desktop review of 181 suppliers. This included 53 suppliers who did not respond to our FY25 modern slavery questionnaire, as well as the 128 who did not receive the questionnaire, as they were identified as potentially high-risk after it was distributed. This assessment relied on publicly available information to assign risk ratings.

Through this work, suppliers were categorised into low, medium, or high residual risk categories, taking into account factors such as the presence of modern slavery statements, evidence of human rights due diligence, and operating context.

Of the 181 suppliers who were assessed, only one supplier remained high-risk following our desktop assessment. We will directly engage with this supplier in FY26. Since our desktop assessment only provides a preliminary indication of our suppliers' residual modern slavery risk, all 181 suppliers will be invited to complete the standard questionnaire in FY26 to enable further engagement and validation of risk ratings.

Supplier engagement

Suppliers who remain high-risk after either, responding to our modern slavery questionnaire, or undergoing a desktop assessment, are prioritised for direct engagement. This engagement helps us to increase our knowledge and awareness of our suppliers' unique risk profiles, and increased buy-in from suppliers to progress modern slavery agendas within their own organisations.

In FY25, we contacted 14 suppliers that had been assessed as high-risk through our FY24 risk assessment process. The purpose of our engagement was to undertake a more detailed review of their modern slavery controls and practices. Supplier interviews were conducted to validate questionnaire responses and to identify any gaps in the information provided, as a result:

- Four suppliers had their risk rating lowered
- Ten suppliers remained high-risk following our engagement process:
  - Six are being supported through tailored modern slavery management plans
  - Four did not respond to interview requests.

Outreach to suppliers who have not yet responded is ongoing, and efforts will continue to monitor and collaborate with high-risk suppliers regarding their management of modern slavery risks.

Residual risk assessment findings

Following the modern slavery questionnaire, desktop assessment and supplier engagement, supplier risk ratings were revised based on the responses and supporting evidence provided. The table below presents a summary of the key outcomes from this residual risk evaluation process:

Risk assessment steps	Number of suppliers assessed	Suppliers remaining high-risk following assessment and engagement
Inherent risk assessment	**2020**	**349**
Residual risk assessment	**349**	**14**
Suppliers subject to FY24 residual risk assessment	*87*	*10*
Suppliers who completed FY25 questionnaire	*81*	*3**
Suppliers subject to FY25 desktop assessment	*181*	*1*

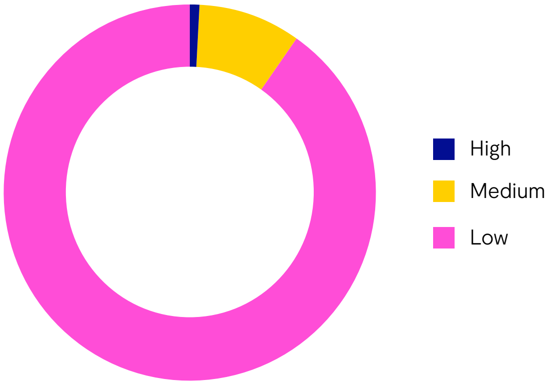
*Seven suppliers were identified as potentially high-risk following our FY25 modern slavery questionnaire, however four had been previously identified through our FY24 residual risk assessment, and are reflected in the FY24 total provided above, so we have not included them in this row to avoid double-counting.

The 14 suppliers identified as having high residual risk fall into the following categories:

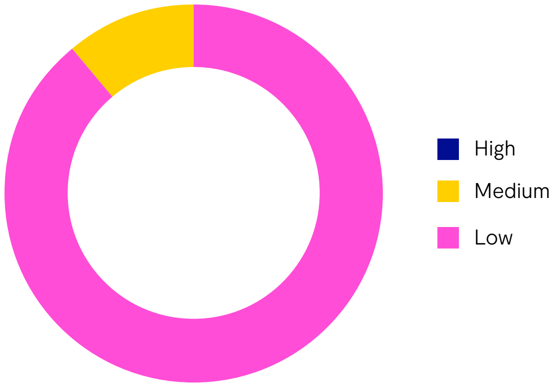
- Six suppliers, identified in FY24, have acknowledged their high-risk status and currently have modern slavery management plans in progress to address identified risks. We will continue to work with these suppliers to implement their agreed actions in FY26.
- Three new suppliers were classified as high-risk following the FY25 modern slavery questionnaire. Interviews have been scheduled for FY26 to validate their risk ratings and gather further information.
- Four suppliers were identified as high-risk through both our FY24 and FY25 modern slavery questionnaires and have not responded to engagement requests. We will continue to try to engage these suppliers in FY26, and if we are not successful, will consider ending our relationship with them.
- One supplier was identified as high-risk following our desktop assessment and will be issued our FY26 modern slavery questionnaire to gather further information.

Beyond this group, 177 suppliers were classified as medium risk in FY25 and 1,829 as low risk.

Residual risk % of suppliers



Residual risk % of spend



This outcome demonstrates strong progress, with high modern slavery risks concentrated in less than one per cent of our supplier base and 0.4 per cent of our overall supplier spend. Importantly, several high-risk suppliers are already implementing corrective actions, and we will hold newly identified and non-responsive suppliers to account through further engagement in FY26. The low or medium risk classification of over 99 per cent of suppliers and spend reinforces the overall resilience of our supply chain. Looking ahead to FY26, our focus will remain on targeted engagement with our potentially high-risk suppliers while also broadening the reach of our due diligence processes to include all new suppliers onboarded as a result of the TPG acquisition.

Previously, our supply chain due diligence program involved conducting site visits and audits for high-risk suppliers. However, in FY25, we refined our strategy. As our approach evolved, we determined we would engage our potentially high-risk suppliers. This engagement has led to the development of tailored action plans with six high-risk suppliers throughout FY25, as outlined below. Following the implementation and monitoring of these plans, we will determine which suppliers require more comprehensive modern slavery assessment through site audits. This phased approach facilitates trust-building, strengthens supplier capabilities, and ensures that audits are conducted where they will deliver the greatest value.

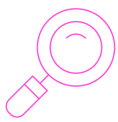
Supplier management plans

In FY25 we collaborated with six of our high-risk suppliers to develop tailored modern slavery management plans.

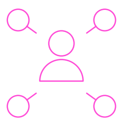
Across these plans, a total of 49 recommended actions were identified, targeting improvements in transparency, governance, and labour practices.

The actions reflect a range of common recommendations, adapted to each supplier's circumstances, including:

Commit to modern slavery management

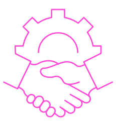


Identify modern slavery risks in the organisation and broader value chain

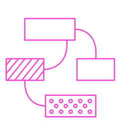


Assign accountability to key personnel to monitor modern slavery in the organisation

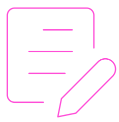
Upskill workers to support the identification and management of modern slavery risks



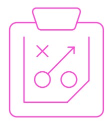
Establish ongoing management of modern slavery risks appropriate to the organisation



Monitor management program through tracking key indicators



Report modern slavery management activities



Strengthen grievance mechanism and remediation approach

At the time of reporting, 25 recommended actions had been completed by our six high-risk suppliers, exceeding our target of 50 per cent completion.

This marks a significant advancement in our approach to managing modern slavery, shifting the focus toward meaningful action as well as risk reduction. The management plans help build long-term supplier capability, strengthen governance, and promote responsible business practices across our supply chain.

Assessing modern slavery risks in our operations

In addition to managing modern slavery risks in our supply chain, we are committed to identifying and mitigating risks within our own operations. This includes oversight of our contracted workforce and the provision of training and awareness programs to ensure all employees understand their responsibilities in preventing modern slavery.

Our contracted workforce

A range of functions supporting Vocus' Consumer and Commander businesses, as well as some aspects of Vocus Network Services, are provided by a workforce in the Philippines employed by a third-party business process outsourcing partner. These functions include inbound and outbound sales teams, customer service, technical support, provisioning and credit control.

To ensure the effective implementation of our company culture, values, strategy, and sales practices across our contract workforce, we maintain a close working relationship with our third-party partner. 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 and due diligence process to manage potential risks across their operations and supply chain.

Recognising the elevated risk profile for offshore, non-Vocus workers, we conducted a modern slavery site audit in the Philippines in FY24. The audit included policy reviews and direct engagement with employees to confirm awareness of rights, workplace policies, grievance mechanisms, and ethical obligations. Observations indicated strong compliance and understanding, with no concerns identified regarding policy clarity or process use. Building on this, in FY25 we strengthened oversight by establishing Monthly Business Review meetings with our third-party partner to monitor workforce practices and reinforce our expectations.

Training and awareness

To ensure our team is well informed about their rights and responsibilities, we provide mandatory modern slavery training. This training is essential in equipping our staff with the knowledge to identify and address modern slavery risks. In FY24, we integrated a modern slavery awareness module into our compliance training program, making it mandatory for all employees to complete biennially. By the end of FY25, it had been completed by 1,401 team members, exceeding our target of 1000.

The module is tailored specifically to Vocus and covers key topics such as the definition of modern slavery, its relevance to Vocus, our primary modern slavery risks, indicators of modern slavery, and how to safely report potential instances within our operations or supply chain.

In FY25, we also incorporated this training into our onboarding process to ensure new hires are promptly educated on this critical issue. As a result, we achieved an 81 per cent completion rate amongst our new hires. While this fell short of our 100 per cent target, it represents a strong foundation for continuous improvement. In FY26, we will explore opportunities to strengthen onboarding compliance.

Industry collaboration

Collaborating with our peers has helped us to develop an effective, industry-aligned response to modern slavery.

In FY25, we continued our engagement with the Telco Together Foundation (TTF), a not-for-profit organisation within the Australian telecommunications industry that works to drive social change collaboratively. As a member of TTF's Modern Slavery Roundtable and industry working group, Vocus contributed to discussions that informed the development of the Pathway to Respecting Human Rights and Addressing Modern Slavery Risks handbook. This resource, developed by telecommunications providers, outlines best practices and offers a sector-specific framework for managing modern slavery risks in Australia.

Additionally, we were involved in TTFs review of supplier training practices related to modern slavery. While this work is still in its early stages, we will look into further opportunities to strengthen supplier engagement and training in future reporting periods.

In support of our contribution to TTF's industry roundtable and working-group, Vocus is a signatory to TTF's Industry Statement on Human Rights and Modern slavery, through which we have committed – alongside our industry peers - to uphold the following principles:

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

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.

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.

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.

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.

Assessment of effectiveness

Our management of modern slavery risks is assessed and managed consistently within our enterprise-wide Risk Management Framework. Regular management reporting, oversight by the Board Audit and Risk Committee on our progress against the Modern Slavery Action Plan and Key Performance Indicators (KPIs), along with Board reporting on the status and effectiveness of our governance framework and related Corporate Governance policies, play a crucial role in ensuring the effectiveness of our management strategies.

To further ensure the effectiveness of our risk management approach, we monitor supplier completion rates of our risk-assessment questionnaire and conduct annual meetings with our strategic suppliers at a minimum. These meetings are used to ensure our suppliers' compliance with our expectations regarding modern slavery and to discuss their risk management strategies.

In FY25, we further enhanced our approach by introducing supplier management plans for high-risk suppliers, and KPIs associated with the number of recommended actions completed throughout the year. This process provided regular opportunities for us to engage our suppliers, assess their progress, and measure their effectiveness in mitigating their modern slavery risk through the implementation of their agreed management plans.

This year we also undertook an internal audit of our third-party risk management processes. A key outcome of the audit was the recommendation to establish a unified supplier risk classification framework that includes modern slavery, alongside other risk factors. By embedding modern slavery into this broader framework, Vocus is strengthening its ability to consistently identify, assess, and manage modern slavery risks across its supplier base. This integration ensures that modern slavery is not treated in isolation, but as a core component of business-as-usual risk management.

Consultation process

Internal consultation

Vocus' General Counsel & Company Secretary, who also serves as the company secretary for each of Vocus' subsidiaries, played a key role in shaping our approach to Modern Slavery, and provides ongoing governance oversight. The Modern Slavery Working Group, made up of representatives from Procurement and ESG, led the delivery of our FY25 Modern Slavery Action Plan, as well as the drafting and review of this Statement. This collaborative effort ensured that various perspectives and expertise were incorporated, enhancing the robustness and relevance of our modern slavery risk management processes.

Throughout the reporting period, Vocus maintained regular internal consultation regarding our modern slavery statement. This ongoing dialogue extended to the implementation of our broader modern slavery risk management processes. Regular updates and discussions were held to refine our strategies, address emerging risks, and ensure that our practices remained aligned with evolving legal and ethical standards.

External consultation

Vocus engaged with external stakeholders, including industry body, Telco Together Foundation, strategic partners, suppliers and peers to benchmark our practices and incorporate best practices into our management framework. This external consultation provided valuable insights and helped us to remain abreast of emerging industry best practices and regulatory updates.

By fostering a culture of open communication and collaboration, Vocus aims to continually improve our approach to managing modern slavery risks, ensuring that our actions reflect our commitment to human rights and ethical business practices.

Looking forward

Vocus is committed to addressing modern slavery and protecting human rights throughout its operations. The approach is based on continuous improvement, ethical business practices, and the responsibility to safeguard the rights of individuals in the supply chain. Key areas of focus have been identified, and targets have been set for the coming year to enhance this approach.

In FY26, our focus will be on delivering against our FY26 Modern Slavery Action Plan commitments:

- Achieve 98 per cent completion of modern slavery awareness training for all eligible employees
- Undertake screening of all new suppliers to identify potential modern slavery risks
- Conduct residual risk assessments for all suppliers identified as potentially high-risk
- Include modern slavery controls in all new supplier agreements
- Ensure a timely response to all reported modern slavery incidents, with resolution actions initiated within 90 days
- Implement management plans for all high-risk suppliers
- Ensure all supplier management plan actions are tracked and completed within agreed timeframes

Approval

This Modern Slavery Statement was approved by the Board of Directors on 20 October, 2025 and is signed on its behalf by the Chief Executive Officer and Chair of the Board.

Andrés Irlando
Chief Executive Officer

Mark Cross
Chair of the Board

Appendix

Modern Slavery Act 2018 (Cth) reporting criteria

This table outlines where each criteria in the Modern Slavery Act 2018 (Cth) is addressed within this Statement:

Requirement	Page reference
Identify the reporting entity	About this statement, page 2
Describe the reporting entity's structure, operations and supply chain	Organisational structure, operations and supply chain, page 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	Modern slavery risks, page 8
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	Modern slavery risk management framework, page 10
Describe how the reporting entity assesses the effectiveness of these actions	Assessment of effectiveness, page 19
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation process, page 20
Provide any other relevant information	Looking forward, page 21

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