



# Modern Slavery Statement

# Introduction.

Founded in 2014, and listed on the Australian Securities Exchange since 2015, Superloop operates in three segments of the market: Consumer, Business and Wholesale connectivity. All segments leverage Superloop's investments in physical infrastructure assets that include fibre, subsea cables, and fixed wireless, as well as Superloop's software platforms, and computer hardware, interconnecting these assets together and with the NBN. Hundreds of thousands of homes and businesses rely on Superloop, Exetel and the other brands within the Group for their connectivity needs.

## WHAT HAS CHANGED SINCE OUR FIRST MODERN SLAVERY STATEMENT?

Since publication of our first Modern Slavery Statement in April 2021, there continues to be considerable change to our business. In the past 12 months we continue to grow organically through transitioning of customer and business customers to Superloop as well as partnering with wholesale and white label clients. Superloop's three year strategy originally set in 2021 is now complete and Superloop has established a new three year growth ambition, creating a platform for growth across all customer segments.

## A message from our CEO.

We are pleased to present our fourth Modern Slavery Statement, which builds upon the 2023 statement.

Superloop's core values represent who we are, what we do, and how we go about doing business. The principle of accountability is a core value that ensures we fully accept our health and safety responsibilities in line with the law. As such, Superloop has instituted a robust governance framework that is founded on integrity and ethical standards.

As Superloop continues to grow and develop, so too does the complexity and size of our supply chain. This expansion has the potential to increase touchpoints with non-Organisation for Economic Co-operation and Development (OECD) nations, as well as increasing the number of people we have located in countries outside of Australia, thus remaining vigilant in the fight against Modern Slavery is an ongoing commitment that I take very seriously. Protecting the human rights of those we employ and work with remains a key priority, a moral obligation and is central to Superloop's values and identity as a leading telecommunications provider.



Handwritten signature of Paul Tyler

Paul Tyler  
Managing Director & Chief Executive Officer  
30 June 2024

# Structure and Reporting Entities.

Superloop Limited is structured as follows:

1. Customer facing divisions:

- The Consumer segment serves Australian homes and residential customers with fixed broadband, mobile, voice over IP (VOIP) services, and in-home cyber security. Following the acquisition of Exetel in August of 2021, the Group's products in the Consumer space are delivered to customers via two retail brands – Superloop and Exetel.
- The Business segment operates in the three key sub-segments of small business (SMB), medium and large corporate. The Business segment has an ambition to provide a market leading B2B customer experience, simple offerings and excellent delivery. In the Business segment, the Group offers Internet, Mobile, VOIP, Security, VPN (Virtual Private Network), SASE (Secure Access Service Edge), Wi-Fi and Fixed Wireless products through both direct and indirect sales channels.
- Our Wholesale segment which predominantly provides products and services to two broad pools of wholesale customers.
  - Large domestic and multinational technology and telecommunication customers who require data and connectivity solutions throughout Australia and from Australia to Singapore on Superloop's Indigo subsea cable; and
  - Domestic internet service providers who require either data and connectivity solutions or a technological interface to the NBN through the Superloop Connect platform.

2. Support functions including Finance, Legal, Compliance and Risk, People and Culture and Operations.

## Our Values.

At Superloop, we have three core principles which reflect who we are and what we expect of our people and business partners. Overlaying our values is our Code of Conduct, which helps us ensure we adopt a consistently ethical approach to compliance issues across our operations, including how we address the risk of Modern Slavery.

### Unleash Possibilities

We champion new ideas, knowing that every voice, solution or suggestion can make a positive difference. We are open-minded, eager to break down walls and be better at what we do - both individually and as a team. We thrive on being the challenger and jump on opportunities to make sure great ideas flourish to life.

### Start with the Customer

We regard our internal and external stakeholders as customers, and put customer satisfaction at the core of our work ethic. We work passionately to enhance the customer experience, holding ourselves accountable when we get things wrong. We act on well thought out direction and purpose and never settle for good when we can be excellent.

### Win Together

We embrace diversity and the contribution every one of us can make to get the job done. We create environments that are founded on effective communication, collaboration and empathy. We recognise that we collectively make up the culture we work in every day and we set a precedent that inspires and unifies others.

# Our Governance Framework.

At Superloop, we recognise that excellence in corporate governance is underpinned by transparency, rigour and accountability. These are essential elements in the long-term performance and sustainability of our business in meeting our obligations to our stakeholders.

Superloop is committed to operating in a socially responsible and ethical manner. Superloop aims to meet the highest standards of integrity.

Following on from the commitment we made in 2023, we have completed our Procurement Governance Framework and introduced a new Procurement Policy. The new framework and policy support our Modern Slavery response and ensure that our processes are consistent and aligned across all areas.

To learn more about our governance processes, please see our Corporate Governance Statement, available on Superloop's Investor Centre at [investors.superloop.com](https://investors.superloop.com)

## Our People.



Superloop currently employs over 880 people with 40% of our workforce in Australia and the remaining 60% in overseas locations such as Sri Lanka and the Philippines. We ensure that our people, no matter where they are in the world, have a safe and healthy working environment, are free to associate, and have the right to collective bargaining, as well as ensuring we are actively working towards the abolishment of all forms of forced and compulsory labour, the abolition of child labour, as well as the elimination of discrimination in respect of employment and occupation. We are doing this through the combination of:

- our employment conditions, policies and procedures that cover all employees regardless of geographical location; and

- our supplier management practices, which are increasing oversight of not only our Tier 1 Suppliers but also their operations along the chain, to ensure that we are constantly identifying and assessing Modern Slavery risk within our supply chain.

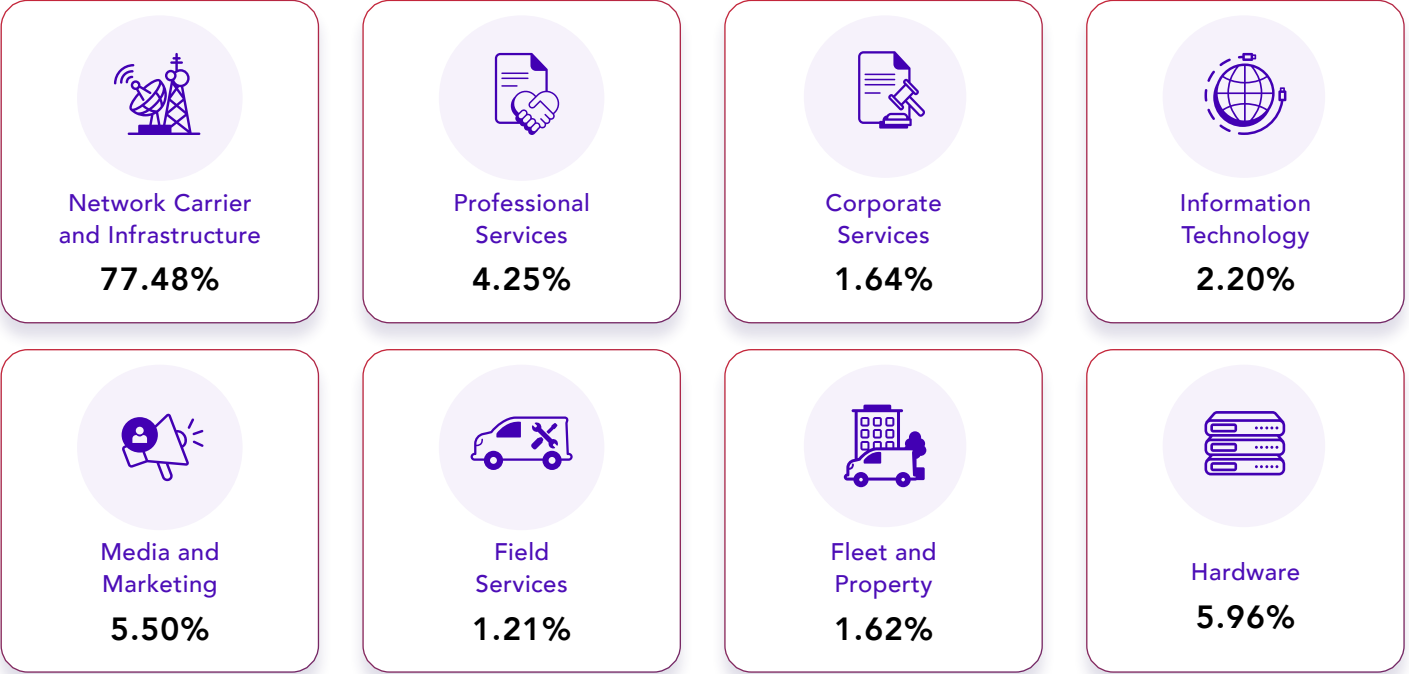
We also indirectly employ a number of staff. We have worked with the providers in these countries to ensure that all employment agreements incorporate the standards of the International Labour Organisation's Declaration on the Fundamental Principles and Rights at work.

We use relevant industry benchmarks and country benchmarks to ensure all employees of Superloop, both direct and indirect are paid a living wage. These wages should always be enough to meet basic needs and to provide some discretionary income to allow all employees to maintain a decent standard of living.

# Our Supply Chain.

In FY24 Superloop engaged over 580 Suppliers in 16 Countries with 80% of our spend with 14 Suppliers.

A breakdown of our supply chain expenditure is shown below:

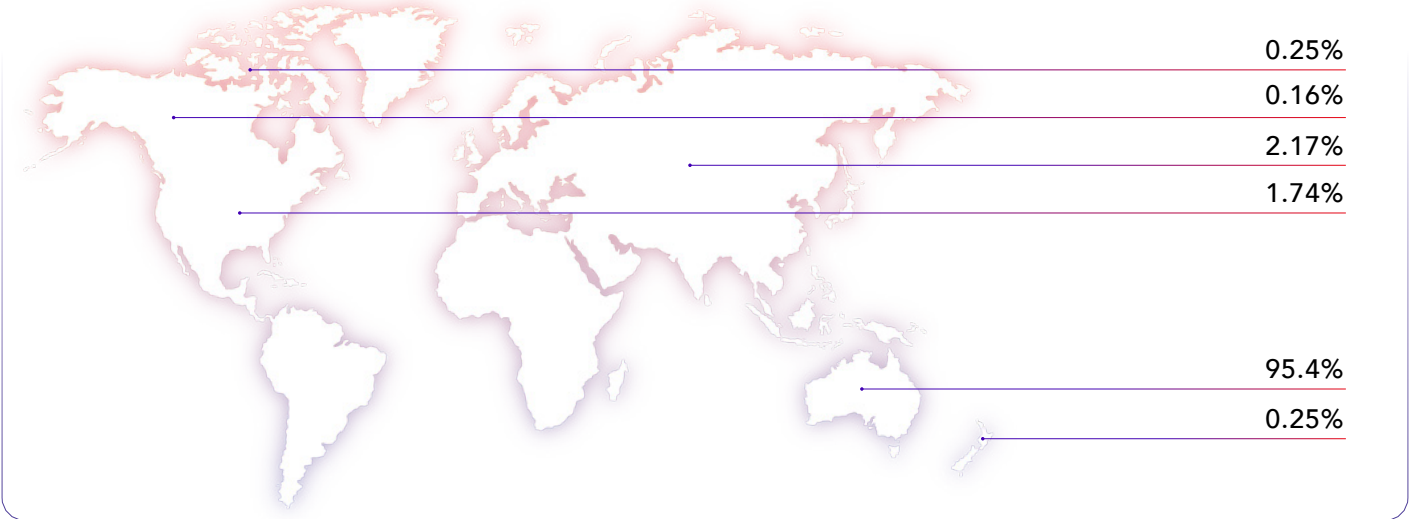


\*Please note all amounts have been rounded and as such may not directly add to 100%

Our spend on network devices is predominately with large multinational companies and their Australian distributors. We do not manufacture any of our own devices but do work with larger corporations to sell their network devices, such as modems to our customers. These are not Superloop branded. The majority of our network devices, although purchased directly through Australian entities are

manufactured in China, Thailand, and Vietnam. As a result, we work with these suppliers to ensure we understand, and risk evaluate the extent of their supply chain past Tier 1. We do this through our vendor onboarding documents, Modern Slavery questionnaires and through comprehensive analysis and risk assessment processes using information provided both directly by the suppliers and from independent third parties.

## SPEND BY REGION



\*Please note all amounts have been rounded and as such may not directly add to 100%



Although 95.4% of our current direct spend is with Australian companies or the Australian subsidiaries of multinational companies, we are conscious that many of these companies have operations and manufacturing capabilities outside Australia. We therefore review/assess their operating locations, and those of their suppliers when completing

risk assessments, and administering Modern Slavery Questionnaires. When assessing a Supplier's suitability to be a vendor of Superloop we take into consideration their Modern Slavery risk, how they govern it within their supply chains, and how ethical and sustainable their operations are as a whole.

## How we Identify and Assess Modern Slavery Risk.

Superloop follows the UN Guiding Principles on Business and Human Rights, and in line with this we are continuously reviewing our supply chain for any real or potential risks within our operations. We are continuously assessing these risks through ongoing assessments, supplier performance reviews, and external reporting to ensure that all of our people, and the people within the supply chains we engage with, have the following rights:

- To freely choose employment
- All workers are supplied with contractual work agreements outlining their employment conditions in respect to wages before they enter employment, and about the particulars of their wage for each pay period in a language they are clearly able to understand
- All workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice
- Working hours comply with all national laws, collective agreements and are defined within their contract
- Any overtime is voluntary and paid
- That all workers are paid a living wage that meets, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. That any wages are enough to meet basic needs and provide some discretionary spending

- All workers are treated with respect and dignity, free from physical abuse or discipline, threats of physical abuse, sexual or other harassment, verbal abuse or any other forms of intimidation
- That all working conditions are safe and hygienic, with adequate steps taken to prevent accidents and injuries
- The right to freely associate and collectively bargain without discrimination
- That no child will be employed who is below the minimum legal age and no child or young person below 18 will be employed at night or, in hazardous conditions
- Access to grievance mechanisms
- All suppliers will have anti bribery and corruption policies or agree to adhere to the Superloop policy

We assess the potential Modern Slavery exposures across the following areas: the country/region of the Suppliers and their suppliers' operations, the sectors in which they operate, whether they employ vulnerable workers, and whether they use external recruiters or labour hire companies. We endeavour to mitigate these risks through careful and deliberate supplier selection, and management.

# Risk Areas Identified.

Indirect workforce	Higher risk business model due to location in high-risk countries, and limited control due to indirect employment.
ICT Equipment and Accessories	Produced by potentially vulnerable, low skilled, low wage labour in high-risk countries.
Marketing Merchandise and branded apparel	Produced by potentially vulnerable, low skilled, low wage labour in high-risk countries.
Waste Management and Cleaning	Involves potentially vulnerable, low skilled, low wage workers such as migrant workers, those on visas etc.
Logistics and Freight	Involves potentially vulnerable, low skilled, low wage workers such as migrant workers, those on visas etc.
E-Waste	Involves potentially vulnerable, low skilled, low wage workers such as migrant workers, those on visas etc. There is also increased risk of this type of waste being sent offshore to developing countries for cheaper processing.
Sourcing of Raw Materials	Many of the components in electrical goods are sourced from high-risk countries using vulnerable, low-skilled, low-wage workers. There is also increased risk of these types of components containing conflict minerals. These are produced by lower tier suppliers, which affects our visibility of the risks in this area.

# How we take care of our people.

Superloop’s employment conditions, policies and procedures cover all direct employees regardless of where they are in the world, complying with all local laws at a minimum, but also looking to go above and beyond in providing not only a safe and fair working environment, but one where all Superloop employees feel respected and appreciated.

We have an employee benefit program that includes access to learning and development, free broadband internet, free confidential counselling support through an independent

employee assistance provider, rewards and recognition programs, referral bonuses, the ability to salary sacrifice, and a flexible working policy.

For our indirect employees we ensure that any third-party provider is complying with not only the relevant local laws but also the principles of the International Labour Organization covenant on Civil and Political rights and they are required to report on their own Modern Slavery risk and any investigations by relevant employment law regulators.

# How we address risks in our supply chain.

We are regularly monitoring our suppliers for performance and choose to engage with those who are more likely to have their own mandatory Modern Slavery reporting requirements, as well as relevant policies on Human rights, and Anti-Corruption. We actively screen for this in our onboarding processes and review these policies as part of our suitability assessments.

# Our Supplier Code of Conduct.

We have continued to embed our Supplier Code of Conduct into all facets of vendor management, from onboarding to inclusion in our contractual agreements, and procurement terms and conditions.

Our Supplier Code of Conduct includes the following:

## Safety

Superloop has a fundamental belief that everyone should feel safe in their work environment. Not just physically, but emotionally and mentally as well. We believe that everyone has a role to play in making our environments safe and we expect this responsibility to be taken seriously. Superloop suppliers are expected to comply with applicable health and safety legislation and to take measures to protect the safety of their workforce.

## Terms and conditions of employment

All workers are provided with written contractual agreements outlining the terms and conditions applicable to their engagement including maximum working hours expected in a language that they are able to understand. Furthermore, all workers are provided with payslips which show particulars of the wages paid to them for the pay period concerned in a language that they are clearly able to understand. We consider compliance with these as a minimum and expect that all Suppliers also comply with such standards.

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

Working hours must comply with national laws and shall be defined by contract, they should not exceed 48 hours per week. Any overtime is entered into voluntarily.

## Diversity, inclusion and belonging

Superloop recognises the value of embracing diversity and creating an inclusive environment where employees feel like they belong. All workers are treated with respect and dignity. Superloop has a zero tolerance for any physical, sexual, psychological harassment or any other form of intimidation. Equal opportunity, free of unlawful discrimination is provided during decisions made in relation to recruitment, promotion, compensation, access to training, compensation, termination, or retirement. There should be no discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

We expect our suppliers to actively protect all workers including those workers most vulnerable to discrimination.

In particular, we expect our suppliers to promote and protect the following International Labor Organization (ILO) Core Conventions ((ILO), n.d.):

- Freedom of Association and Protection of the Right to Organise
- Right to Organise and Collective Bargaining
- Forced Labour
- Abolition of Forced Labour
- Minimum Age
- Worst Forms of Child Labour

## Conflicts of Interest

Our people have a proactive obligation to identify and disclose perceived or actual conflicts of interest via a conflict-of-interest register. This is particularly important in the negotiation, selection, and management of Supplier relationships. In the event the Supplier becomes aware of a potential or actual conflict, it should be disclosed to Superloop as soon as possible so appropriate measures can be taken to manage the situation and prevent the conflict from arising or continuing.

## Anti-bribery and Corruption

We will never accept personal gifts or favours where the intent is to influence the outcome of a business decision, sale, or process. At all times, our actions must be for the betterment of Superloop, in line with our Code of Conduct, and not for individual gain. Suppliers must not engage in conduct that undermines our position on this.

## Safeguarding Information and Intellectual Property

We expect our suppliers to respect and safeguard Superloop's confidential information, know-how and intellectual property. All information provided to our suppliers that is not in the public domain is deemed to be confidential and should only be used for its intended and designated purpose for the Supply of goods and/or services to Superloop. All personal information in regard to Superloop's customers or employees is handled with full respect for their privacy as per all relevant privacy laws and regulations and it is expected that Suppliers treat such information in the same manner.



Code Breaches

All of our Suppliers and their extended supply chain are expected to comply with the provisions of our Supplier Code of Conduct, and any relevant Superloop policies and procedures including the Ethical and Sustainable Procurement Policy. The Supplier is expected to identify, correct, and monitor the continued compliance of any activities that fall below the standards expressed in the code. The Supplier will immediately report to Superloop any breaches of this code and together with Superloop will agree on a schedule for corrective action.

A breach of this code may be considered to be a material breach of contract with Superloop, and Superloop will act accordingly within its legal rights in regard to remedies in respect of such breach.

As well as the above we have developed a Procurement Governance Framework to assess our suppliers against the following risk categories:

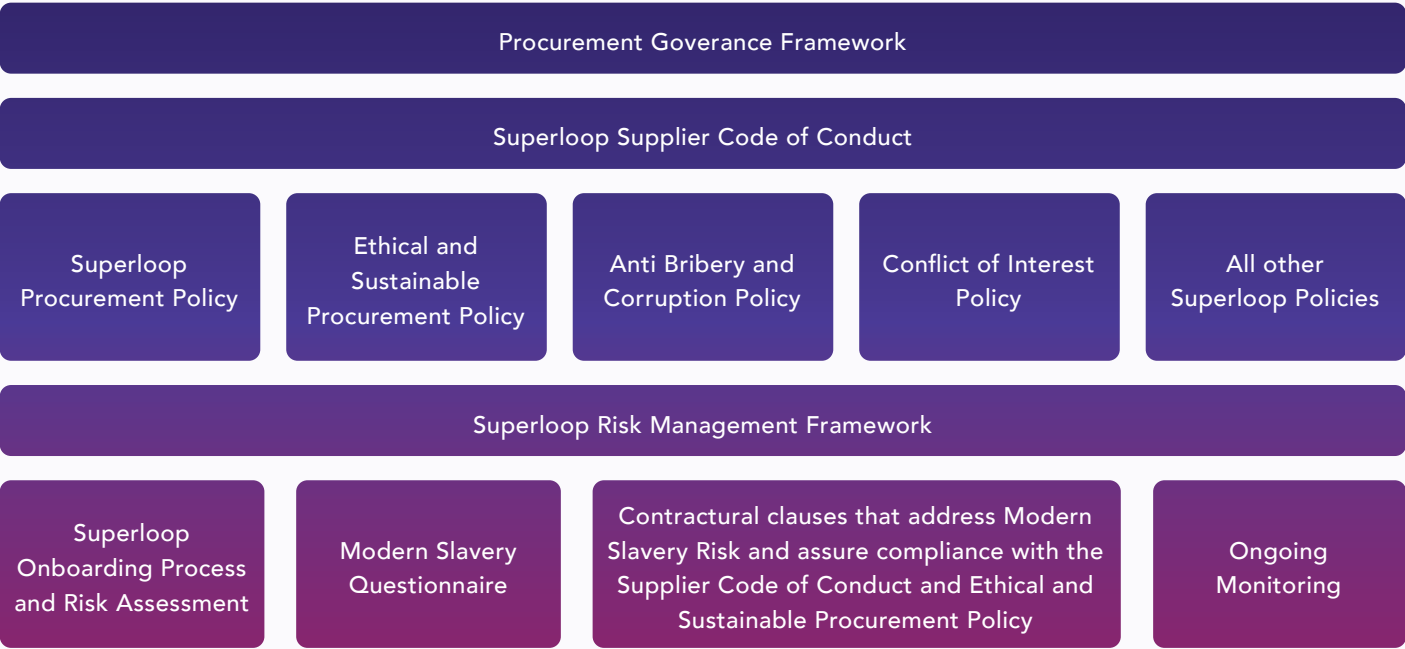
- Labour Practices
- Industry/Site type

- Worker type and skill profile
- Information Security
- Sustainability
- Anti-bribery and corruption
- Health and Safety
- Trade Sanctions
- Climate risk
- Geographical instability
- Business resilience

Through the implementation of a centralised procurement process we have increased visibility over our supply chain and a more in-depth understanding of our suppliers. We have implemented stricter guidelines in relation to supplier onboarding, due diligence and ongoing monitoring, as well as putting controls in place to monitor any spend that occurs outside of the centralised procurement process.

# Procurement Governance Framework.

This year we have worked to develop a Procurement Governance Framework, a new internal Procurement Policy and simplified process maps to ensure that the minimum obligations required of any Superloop team member, and the necessary process to follow is clearly outlined and accessible.



# Modern Slavery Governance.

## MODERN SLAVERY GOVERNANCE STRUCTURE

Board of Directors	Responsible for overseeing the Modern Slavery program of work and the approval of the Modern Slavery Statement.
Executive Team	Provides leadership, review and oversees the Modern Slavery program of work and reviews the Modern Slavery Statement.
Chief Financial Officer	Sponsors Superloop’s Modern Slavery program and is accountable for the Modern Slavery Statement Framework and the delivery of the Modern Slavery Statement.
Modern Slavery Statement	Comprising of representatives across Superloop, who meet on a quarterly basis to oversee activities, review any incidents or allegations, as well as ensuring compliance with the Modern Slavery Act.
Procurement Team	Responsible for the overall Modern Slavery program of work, delivery of the Modern Slavery Statement and ensuring all vendors are assessed for Modern Slavery risk.

## MODERN SLAVERY COMMITTEE

We have established a Modern Slavery Committee to assist in the development and implementation of Superloop’s Modern Slavery Action Plan and may play a role in managing responses to reported incidents and allegations of Modern Slavery.

The Committee will consult on, consider and make recommendations on Modern Slavery issues, including:

- Helping to develop the Modern Slavery Action Plan;
- Helping to manage the response to any Modern Slavery incidents or allegations;
- Consider and make recommendations on proposed changes to processes to better align with our Modern Slavery Action Plan;
- Assist in the development of procedures and policies that relate to Modern Slavery;
- Recommend the establishment, maintenance and monitoring of procedures and programs that may relate to the Modern Slavery Action Plan;
- Keep informed about changes to Modern Slavery legislation and best practices;
- Consider and make recommendations related to the training and education of staff on Modern Slavery;
- Examine Modern Slavery audit reports. Make recommendations about actions related to these reports;
- Participate as required in best practice sessions organised by the Telco Together Foundation and other relevant organisations; and
- Perform other functions as agreed.

# How we are assessing effectiveness.

We know that assessing the effectiveness of our actions is how we will ensure that our response to Modern Slavery is continuously improving, to become stronger and create meaningful impact on our supply chain. We are doing this by ensuring that our policies around human rights are embedded into everything we do. By recording and tracking any reported human rights incidents to ensure our actions are correct, implemented appropriately and have the intended impact.

We will ensure that our processes for engaging suppliers and completing risk assessments are constantly reviewed for improvement. We are implementing clear metrics to ensure that all assessments, are consistent and success is measurable.

We assess risk across the following categories with scoring being given from 1-5 based on information gathered.

## Operational Risk:

- Country of operation
- Operating sectors

## Financial Risk:

- Credit Rating
- Supplier Spend
- Currency Fluctuation

## Information Security:

- Data Access (Any Supplier found to have any form of data access is referred to our Information Security team to be assessed in line with ISO27001)

## Environmental:

- ESG Rating
- Reputational Risk
- Sustainability Rating
- Climate Change Risk
- Geopolitical Risk

## Social:

- Labour Type used
- Percentage of Vulnerable Workers
- Evidence of previous incidents
- Branded/non-branded

## Governance:

- Suppliers' policies in place
- Management capabilities/systems and processes

We are looking to actively engage the wider business group to learn about our processes, supplier governance and increase awareness regarding Modern Slavery.

# Consultation across Superloop.

Superloop Limited and its subsidiaries (Superloop) are jointly committed to implementing policies and procedures that meet our moral and ethical obligations to participate in the global collective action to end Modern Slavery. In preparing this joint statement, Superloop has reviewed and engaged with each subsidiary within the group to assess and address the risk of Modern Slavery.

# Industry Collaboration.

This year we began the process of engaging with the Telco Together Foundation, and our peers within the telecommunications industry, to work collaboratively exploring ways we can work together to combat Modern Slavery in our industry. Additionally, we will review and share cases of best practice to ensure we are continuously improving in how we address Modern Slavery risk in our organisation.

We intend to further look for ways that we can collaborate and drive improvements in not just how we manage Modern Slavery risk, but also through growing sustainable processes and actions within our business.

# Our Commitment.

Provided below is an update of our progress towards the Modern Slavery related commitments we made in our FY23 Modern Slavery Statement:

2023 Commitment	Progress to Date
Finalise the establishment of a Modern Slavery Committee that will have oversight of Modern Slavery actions to both guide the direction of the initiatives and check the effectiveness of any actions taken	Completed - Please see section above regarding this committee.
Develop a Procurement Governance Framework	Completed – We have also developed a new Procurement Policy for internal use to ensure all procurement transactions are aligned.
Complete the roll out and enforcement of our Supplier Code of Conduct	Completed – this is now shared with our Suppliers, embedded in our contractual agreements where relevant, and part of the vendor onboarding process.
Assessment in relation to joining the Telco Together Foundation	Completed- we are now a participating member with our Head of Procurement attending the Modern Slavery Roundtable, best practice sessions and working groups. We intend to also get other members of the newly established Modern Slavery Committee involved as well.

## Moving Forward.

Our focus for the 2024/2025 period will be to:

- Increase our work with the Telco Together Foundation
- Develop grievance mechanisms and remediation processes in relation to breaches of our Supplier code of conduct, as well as incidents or allegations of Modern Slavery within our supply chain
- Work with our Modern Slavery Committee and key stakeholders across all areas of the business to develop and implement a Modern Slavery Action Plan
- Work with our People and Culture Team to develop and deliver training on Modern Slavery to all Superloop team members managing key supplier relationship, and also look to provide general awareness-raising training to the broader Superloop team
- Develop a Supplier engagement and awareness program

For any queries about Superloop's Modern Slavery reporting, please contact us at [investor@superloop.com](mailto:investor@superloop.com).

*This statement was approved by the Board of Superloop Limited in their capacity as principal governing body of Superloop Limited on 26 June 2024.*

# Appendix.

## MODERN SLAVERY ACT CRITERIA

Australian Modern Slavery Act – mandatory criteria	Reference in this statement
Identify the reporting entity	Cover Page
Describe the structure, operations and supply chain of the reporting entity	Page 3 – Structure and Reporting Entities Pages 4 and 5 – Our People and “Our Supply Chain
Describe the risks of Modern Slavery practices in the operations and supply chain of the reporting entity and any entities that the reporting entity owns or controls	Pages 5 to 7 - How we Identify and Assess Modern Slavery Risk
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 7 – How we take care of our people and Page 7 – How we address risk in our supply chain
Describe how the reporting entity assesses the effectiveness of such actions	Page 11 - How we are assessing effectiveness
Describe the process of consultation with any entities that the reporting entity owns or controls	Page 11 - Consultation across Superloop
Any other information that the reporting entity considers relevant	Various sections