

Modern Slavery Act Statement

2024



Acknowledgement

We recognise and acknowledge the existing, original and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands, waterways and sky country across the Australian continent. We pay our respects to their Elders past and present. At Telstra, we are enriched by Aboriginal and Torres Strait Islander peoples' contribution to our organisation, and we commit to building a prosperous and inclusive Australia.

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Reporting entities and disclosure notes

The Telstra Group prepared this statement to meet the requirements of the *Modern Slavery Act 2018 (Cth)* (Australian Act), *Modern Slavery Act 2015 (UK)* (UK Act) and *Fighting Against Forced Labour and Child Labour in Supply Chains Act (CA)* (Canadian Act).

This statement covers the Reporting Entities described in Appendix 1.

Other than the Reporting Entities, no Telstra Group controlled entity meets the reporting entity criteria under the Australian Act, the UK Act or the Canadian Act.¹

Capitalised terms and key concepts are defined in the Glossary in Appendix 3.

1. This statement does not cover Telstra Super, which is preparing its own Modern Slavery Statement. Telstra Super is the trustee for the Telstra Superannuation Scheme. We do not consider Telstra Super to be a controlled entity as we do not meet the criteria for consolidation under financial reporting standards.

CEO statement



Today, nearly 50 million people globally endure the harsh realities of modern slavery², which are exacerbated by rising living costs, global conflict and supply chain pressures. At Telstra, we reject modern slavery in all its forms, including debt bondage, deceptive recruitment, forced labour, forced marriage, servitude, slavery, people trafficking and child labour.

We are committed to supporting and respecting human rights for all people and aligning our efforts with the United Nations Guiding Principles on Business and Human Rights.

This year, we have taken significant steps to better integrate risk processes into our daily operations and equip our teams with the tools and understanding to manage modern slavery risk. Our goal is to ensure that our teams are not just aware, but actively involved in mitigating these risks.

To support this, we have developed guidance for our teams on how to engage in conversations with suppliers on modern slavery risks. We've clearly outlined expected risk management responsibilities including making it easier to understand how to assess mergers and acquisitions (M&A) transactions for any human rights risks.

We also continue to deepen our engagement with our subsidiaries and suppliers on modern slavery risks and their responses.

To enhance our modern slavery response, we have started working to understand and incorporate the experiences of those affected by these inhumane practices, initially by integrating this perspective into our training.

Modern slavery will not be tolerated anywhere in our business or supply chain. We are committed to continuous improvement, transparency and collaboration in our efforts to find and address this abuse of human rights.

We are pleased to present this statement and we welcome any feedback.

FY24 Highlights	Read on to learn more	Page
Collaborated with a charity supporting survivors of modern slavery to refine our Addressing Modern Slavery Training and incorporate insights from those working with survivors	Moving towards a survivor-centric approach	22
Launched an internal guide on human rights due diligence to assist in identifying human rights risks (including modern slavery) in M&A transactions	Human rights due diligence guidance for M&A	25
Updated our Supplier Governance Framework to clarify requirements and help people more easily understand their roles and responsibilities, including in relation to labour rights in the supply chain	Supplier Governance Framework	15
Implemented a compliance check process in our Know Your Supplier (KYS) platform to better review and assess supplier responses in relation to labour practices	Supplier due diligence	16

2. Walk Free 2023, [The Global Slavery Index 2023](#), Minderoo Foundation.

Annual statement of disclosure

In FY24, we did not identify any instances of modern slavery in our operations or supply chain.

However, we recognise that not finding instances of modern slavery does not guarantee its absence, particularly considering the challenges in identifying modern slavery deeper in the supply chain. We remain committed to ongoing due diligence to identify, prevent and mitigate instances of modern slavery.

We have, however, identified some labour practices and behaviours that concerned us and which we have taken action, or worked with suppliers, to remediate.³ Finding these issues demonstrates that our processes are generally effective in identifying situations that could escalate into modern slavery. They also alert us to areas where we may need to review and reinforce our risk management approach. As part of our commitment to transparency, we have chosen to report them and our responses to them in this statement.

The activities described in this statement generally apply across the Telstra Group as a whole. The businesses of the Reporting Entities Telstra Health, Digicel Pacific and Versent, and certain owned or controlled entities in the Telstra Group, such as Fetch TV, are not fully integrated into Telstra operations. The activities of these entities in response to modern slavery risk differ in some instances to that of the remainder of the Telstra Group. Where we have identified material differences in the activities of Reporting Entities, we have set these out in this statement.

This statement is made pursuant to section 14 of the Australian Act, section 54(1) of the UK Act and section 11 of the Canadian Act, as relevant. It is a joint statement for the purposes of the Australian Act. It constitutes the statement of each of the Reporting Entities for the year ended 30 June 2024, has been prepared in consultation with those Reporting Entities, and has been approved:

- on behalf of the Telstra Group by the Board of Telstra Group Limited under section 14(2)(d)(ii) of the Australian Act on 13 August 2024
- on behalf of Telstra UK Limited by the Board of Telstra UK Limited under section 54(6)(a) of the UK Act on 15 August 2024
- on behalf of Telstra Incorporated by the board of Telstra Incorporated under section 11(4)(a) of the Canadian Act on 13 August 2024.

The statement in its entirety is signed below.

Australian Act

Vicki Brady

CEO and Managing Director
of Telstra Group Limited



UK Act

James Lester

Director of Telstra UK Limited
and Executive, International Finance



Canadian Act

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the statement for Telstra Incorporated. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the statement is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the 2024 financial year. I have the authority to bind Telstra Incorporated.

Noah Thomas Drake

President and Managing Director
of Telstra Incorporated



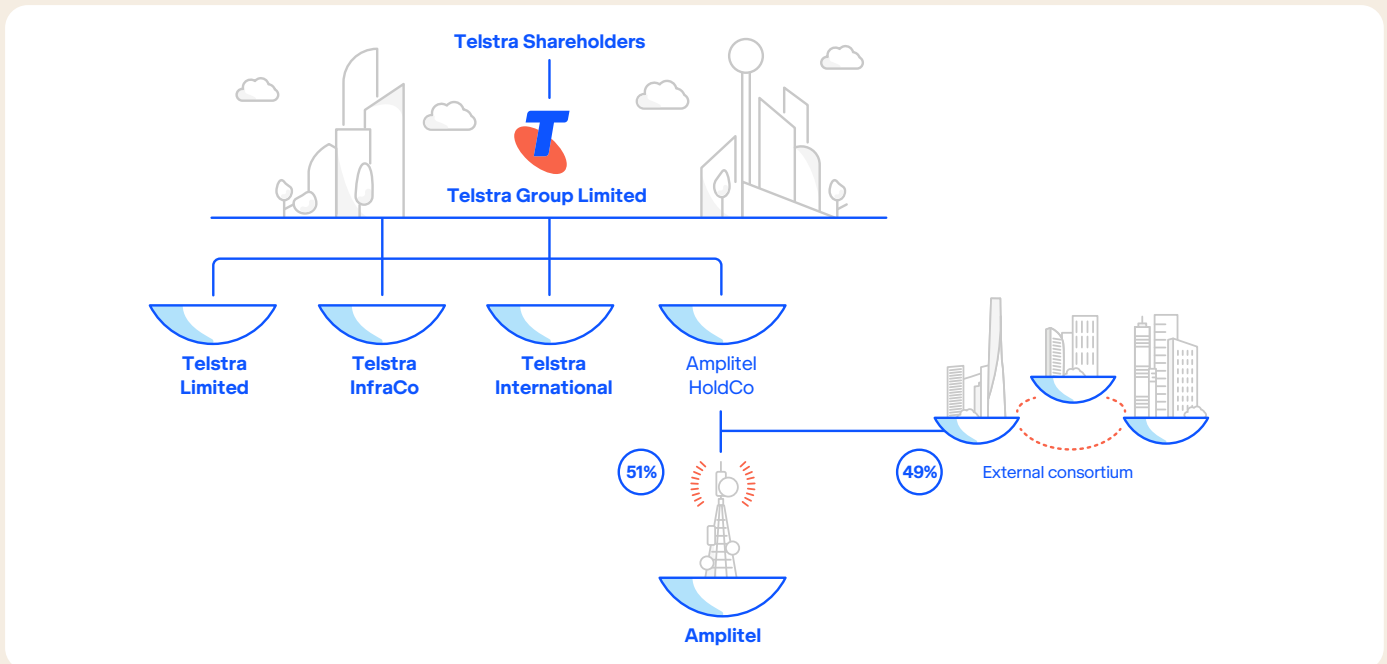
August 2024



3. See the 'Acting on our due diligence findings' section on page 19, as well as the 'Ensuring fair treatment of agency workers' case study on page 13, 'Engaging with suppliers' case study on page 14, 'Improving labour practices in our promotional products supply chain' case study on page 20, 'Protecting workers in our contact centres' case study on page 20 and 'Protecting workers in the security services sector' case study on page 30.

Who we are

Our structure



The ultimate parent entity in the Telstra Group is Telstra Group Limited (TGL). TGL is a 'for profit' company limited by shares incorporated in Australia whose shares are publicly traded on the Australian Securities Exchange (ASX).

The four key entities under TGL undertake the following business activities:

- **Telstra Limited:** Telstra's business including Telstra's retail, wholesale, Health, Energy and Purple businesses, but excluding the businesses of Telstra InfraCo, Telstra International and Amplitel. Telstra Limited also owns and operates the active parts of the Telstra Group's infrastructure network.
- **Telstra InfraCo:** The passive infrastructure asset business (excluding towers).
- **Amplitel:** The separate business of providing access to passive tower assets owned or operated by Amplitel.
- **Telstra International:** Telstra's business of providing international services using the international assets, which includes the Digicel Pacific group.

During FY24, the Telstra Group completed the acquisition of Versent. See the 'How we consult within our group' section on page 25 for more information on Versent.

As of 30 June 2024, the Telstra Group has a direct or indirect interest in over 210 controlled entities across approximately 30 countries.



For a complete list of the controlled entities in the Telstra Group as of 30 June 2024, see the 'Consolidated Entity Disclosure Statement' section of our Annual Report available on our [annual results page](#).

Our operations

Telstra is Australia's leading telecommunications company. We offer a full range of products and services across a customer base that includes consumers, small business, large enterprise and government organisations.



Our world-leading mobile network reaches approx **99.7 per cent of the Australian population**



We have around **280 stores** in Australia



As at 30 June 2024, we provide around **24.2 million retail mobile services** and **3.6 million consumer and small business bundle and data, and voice-only services**



We have access to over **2,000 network points of presence** in more than **200 countries and territories** around the world



Details of the specific business of each Reporting Entity are set out in [Appendix 1](#).



For more information about our business and business strategy, see our 2024 Annual Report available on our [annual results page](#).

Our workforce

Our workforce by headcount^{4,5}

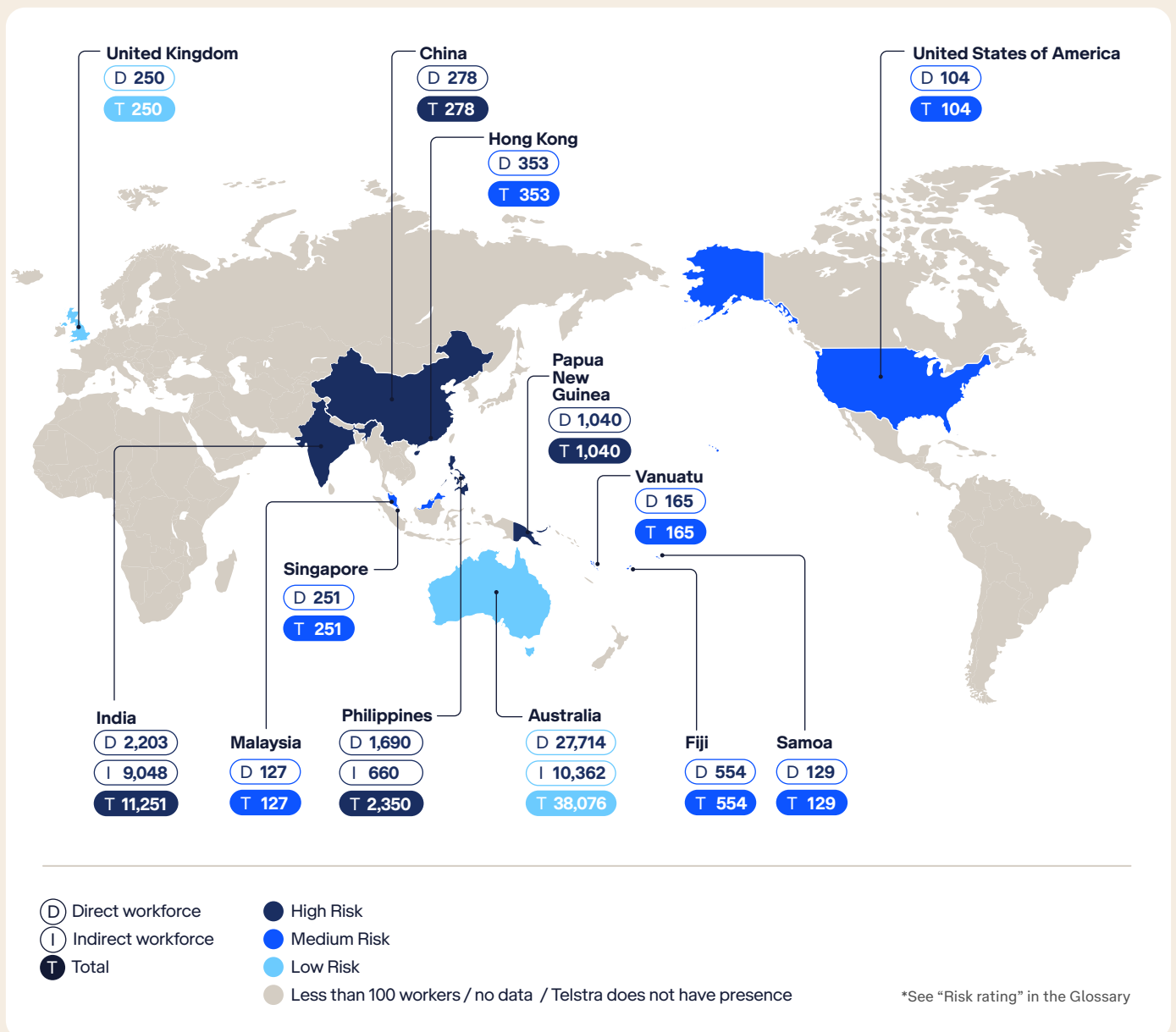
	Direct workforce	Indirect workforce
 Globally	35,107	20,492
 Outside Australia	7,393 (21.1% of global direct workforce)	10,130 (49.4% of global indirect workforce)
 Locations	26 countries	39 countries

Telstra relies on a highly diverse workforce and engages people with broad and varied skillsets, ranging from salespeople through to technology experts. Our workforce is comprised of Telstra employees and workers engaged through industry partners.

Most of our indirect workforce supports Telstra in delivering both customer-facing and back-office processing services. Our main centres for indirect workers outside Australia are India and the Philippines.

Our global labour rights risk profile for key locations

Telstra's direct and indirect workforce exposure to labour rights risks by locations (with more than 100 workers)*



4. All people data in this statement is expressed as headcount, not full-time equivalents (FTE) and is as at 30 June 2024.

5. We have undertaken a review of our workforce location data sources to more accurately reflect worker location. This has resulted in a higher number of indirect workforce locations compared to previous years. Of these, 25 locations have fewer than 10 workers. This data also includes the workforce of controlled entities that were not previously captured within our HR system (e.g. Digicel Pacific and Fetch TV), and the workforce from new acquisitions such as Versent, which has resulted in a higher headcount number compared to previous years.

Our supply chain

In FY24, Telstra Group engaged directly with⁶:

-  More than **6,000 suppliers**

-  From **87 countries**

-  Approx **78%** of total spend was with our top 100 suppliers

Telstra’s supply chain is large, complex and constantly evolving. We rely on our direct suppliers (tier 1) for a wide array of products and services. These suppliers in turn, are supplied by their own suppliers (tier 2, 3, 4 suppliers and so on). As we move down the supply chain, gaining visibility gets progressively harder.

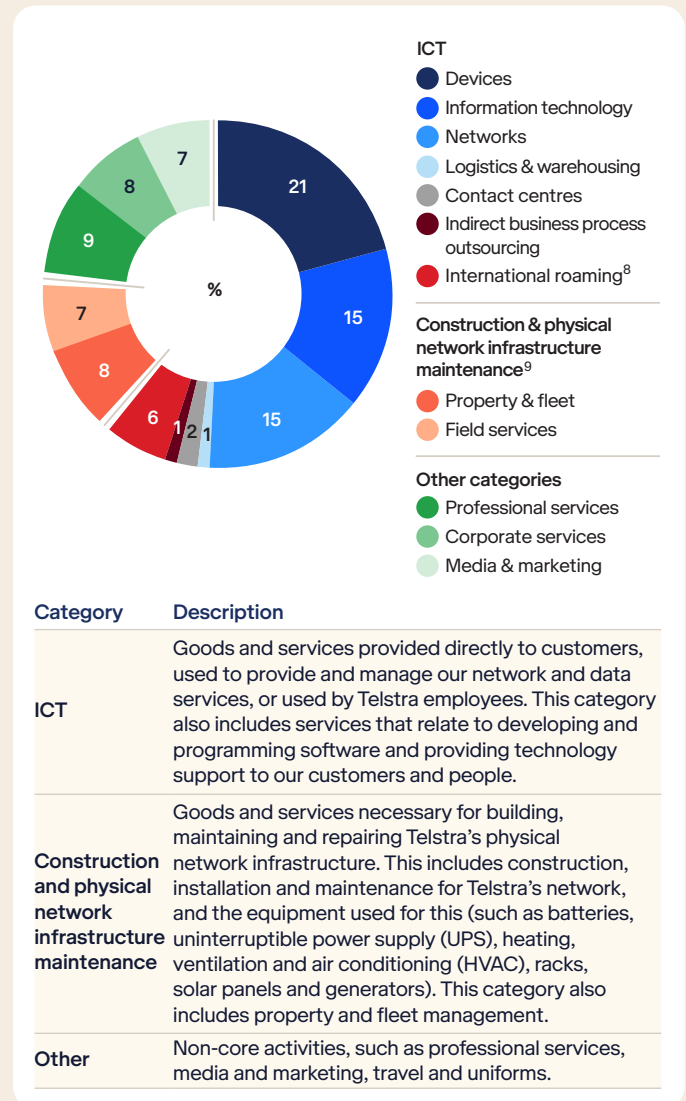
Most of our supplier spend is on Information and communications technology (ICT) and network infrastructure, including electronics and network components. We do not manufacture our own products. Instead, we procure finished goods from large multinational companies and work with original design manufacturers to produce Telstra-branded devices.

The services we procure are predominantly provided from Australia, India and the United States. The goods we procure, while predominantly purchased in Australia, are manufactured across the world. Major manufacturing locations include China, Vietnam and Indonesia.

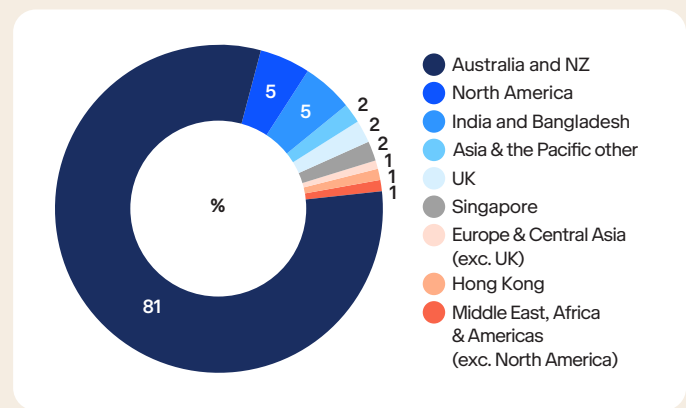
Approximately 84 per cent of what we spend directly is with suppliers based in low risk countries.⁷ However, we recognise these suppliers may be headquartered, or manufacture, overseas. Therefore, we look at both the risk posed by a direct supplier and by suppliers further down the supply chain, including their location, to identify potential risks.



% of Telstra direct supplier spend by sub-category



% of Telstra direct supplier spend by country¹⁰



6. These figures capture Telstra Group entities who use Telstra’s centralised procurement processes. These figures do not include Telstra’s owned or controlled entities who do not use Telstra’s centralised procurement processes. See the ‘How we consult within our group’ section on page 25 for examples.

7. See “Risk rating” in the Glossary.

8. The 4% increase in International roaming spend from FY23 is due to a change in our reporting methodology, now including roaming charges that were previously categorised as non-addressable. Non-addressable spend is excluded from this spend analysis as it typically includes payments such as company, payroll, and telecommunications taxes, etc.

9. In FY24, we revised the spend categorisation to more accurately distinguish between Property & fleet and Field services, reallocating some spend from Property & fleet to Field services. This led to decreased spend in Property & fleet and increased spend in Field services. In addition, there was also an aggregate spend reduction across these categories.

10. Country location is based on the supplier registered address in our vendor management system. This may not necessarily reflect the country where the product or service is sourced from.



Our approach

Our purpose, objectives, behaviours and habits

Our purpose is to build a connected future so that everyone can thrive.

Our behaviours and habits are what we strive to practice every day so we can be our best.

Each behaviour is supported by specific habits which can be done by every employee, every day, and are the things we are seeking to emphasise within our culture. These behaviours and habits support our people to deliver on our compliance obligations and achieving our environment, inclusion and responsible business ambitions.

Working to prevent modern slavery in our operations and supply chains is necessary to support our purpose and company objectives and embody our behaviours and habits.

The Big Three

Our behaviours and habits

Look Beyond
See the big picture
Strive for customers
Learn and adapt

Work as One
Listen first
Speak up
Align and commit

Make a Difference
Do what matters
Own it
Act with care

Modern slavery governance

Modern slavery risks relating to our direct workforce are managed through our compliance framework. Our compliance framework defines how we manage our obligations, compliance and controls, including those relating to wages and benefits and provision of a healthy, safe and sanitary workplace. Modern slavery reporting is also managed as an obligation under our compliance framework.

Modern slavery risk relating to our supply chain is managed through our risk management framework.



Further detail on our compliance and risk management framework is provided in our 2024 Corporate Governance Statement and the 'Our material risks' section of our 2024 Annual Report available on our [annual results page](#).

Management of modern slavery issues at Telstra is also supported by a Human Rights Working Group sponsored by the Chief Sustainability Officer. This is a cross-functional group comprising representatives from legal, workplace relations, supplier services and compliance and risk teams which meets quarterly to consider and address human rights issues and areas of focus and how they are managed across Telstra, including issues relating to labour rights in the supply chain.

Our policies

Telstra’s Group Policies support our commitment to respect human rights and manage the risk of modern slavery in our operations and supply chain.

Our Group Policy Governance Framework and Group Governance Operating Model set out the expectations for entities in the Telstra Group to adopt or align to the Telstra Group Policies and supporting frameworks such as the Supplier Governance Framework, or to seek an exemption. We continue to work towards full adoption of, or alignment to, our policies by all group entities.

Our Governance, Risk and Compliance Tool documents all Group Policies and any current entity exemptions.



Policy	What it covers	Scope	Implementation
Code of Conduct (Code)	<ul style="list-style-type: none"> Helps us take a consistent, global approach to ethical and compliance issues, including modern slavery Sets out the ethical and behavioural principles governing how we do business to help make sure we do the right thing Sets out where to go for help or raise concerns, including our Whistleblowing Service 	Applies globally to all directors, employees and contractors in the Telstra Group, including its controlled entities (unless an exemption has been granted)	<ul style="list-style-type: none"> Communicated to employees as part of the onboarding process Available on Telstra’s public website and intranet Reviewed annually Training on the Code is provided to our workforce via our Business Essentials Training Supported by various Telstra Group Policies and Standards Breaches are investigated by the Chief Risk Office investigations team or the HR global case management team Material breaches of the Code are reported to the People and Remuneration Committee of the Board
Human Rights Policy	<ul style="list-style-type: none"> Sets out our commitment to respect and support human rights This includes providing a fair, safe and healthy working environment, not tolerating or supporting the use of child labour, forced or compulsory labour and respecting and supporting employees’ rights to freedom of association and collective bargaining Identifies avenues to make reports about concerns or breaches 	Applies to employees, contractors, notified individuals, suppliers, business partners and other third parties	<ul style="list-style-type: none"> Available on Telstra’s public website and intranet Reviewed annually Supported by a plain English Human Rights Policy guidance document to help our people understand what the Human Rights Policy means practically for them in their day-to-day work, including how to identify and report human rights breaches. This includes examples relating to modern slavery Training on our Human Rights Policy is provided as part of our Business Essentials Training
Dealing with Suppliers and Other Third Parties Policy	<ul style="list-style-type: none"> Sets out the principles that apply when engaging with suppliers or third-party agents. This includes: <ol style="list-style-type: none"> Assessing and managing risks (such as labour practices risks) and potential impacts to the Telstra Group when engaging suppliers Managing and reporting compliance incidents Ensuring suppliers are aware of Telstra’s requirements of them under the Supplier Code of Conduct Identifies avenues to make reports about concerns or breaches 	Applies to employees and contractors of the Telstra Group and any person notified	<ul style="list-style-type: none"> Available on Telstra’s intranet Supported by the Supplier Governance Framework Reviewed every other year Training is provided to our procurement function via our Procurement Principles Training and to our wider business stakeholders who deal with, or manage suppliers, through the Supplier Governance Framework Training

Policy	What it covers	Scope	Implementation
Supplier Code of Conduct	<ul style="list-style-type: none"> • Sets out the minimum standards we expect from our suppliers • Aligned with the 10 universally accepted principles of the UN Global Compact, Responsible Business Alliance (RBA) Code of Conduct and Joint Alliance for Corporate Social Responsibility (JAC) Supply Chain Sustainability Guidelines and legislative obligations (including relating to modern slavery) • Sets out requirements relating to labour rights of workers, including: <ul style="list-style-type: none"> • Compliance with applicable laws and certain International Labour Organisation standards • Prohibitions on child labour, forced, bonded, compulsory labour, slavery and human trafficking, and practices of concern such as the use of recruitment fees or confiscation of identification documents • Includes requirements on suppliers to monitor their own and their suppliers' compliance with our Supplier Code of Conduct, correct any identified non-conformance and notify us if they become aware of an actual breach of, or reasonable likelihood of a breach 	Our suppliers	<ul style="list-style-type: none"> • Available on Telstra's public website • Forms part of, and is provided to suppliers as part of, our standard purchasing terms • Reviewed annually • Updated in March 2024 and provided to all suppliers engaged in FY24 • We work with our suppliers to assess whether they are meeting our standards through our supplier due diligence process and audit program • We set requirements for our businesses to monitor compliance through our Supplier Governance Framework • We raise internal awareness of our Supplier Code of Conduct through our Supplier Governance Framework Training
Whistleblowing Policy	<ul style="list-style-type: none"> • Establishes protections (in conjunction with the relevant legislation) for those reporting concerns about illegal, unethical or improper conduct or state of affairs at Telstra 	Current and former employees, their relatives and dependants as well as suppliers	<ul style="list-style-type: none"> • Available on Telstra's public website and intranet along with a Quick Guide to assist individuals seeking to report concerns • Links to Telstra's Whistleblowing Service are included in other Telstra policies, including the Code and Supplier Code of Conduct • Training is provided as part of our Business Essentials Training • Additional "Protecting Whistleblowers" training is provided every 2 years to staff who receive whistleblowing reports • Reviewed annually



Our modern slavery risks

The United Nations Guiding Principles on Business and Human Rights (UNGPs) expect businesses to carry out human rights due diligence to assess both actual and potential human rights impacts. Labour risk in the supply chain is a salient human rights issue for Telstra.



For information on our full list of salient human rights issues see the 'Human rights' section in our 2024 Bigger Picture Sustainability Report available on our [reports page](#).

Our relationship to modern slavery risk has been assessed using the UNGPs' continuum of involvement, which explains how a business may be involved in potential or actual human rights impacts such as modern slavery, by causing, contributing to, or being directly linked to it.¹¹ The nature of our involvement informs our response. Our assessment indicates Telstra is most likely to be directly linked to modern slavery impacts in our identified risk areas, through our business relationships, rather than causing or contributing to them. However, we recognise there is a potential risk we might cause or contribute to modern slavery if the risk management controls outlined in this statement were not in place.

Our modern slavery risk identification is informed by an initial FY20 modern slavery risk review by an independent third-party of our global operations and supply chain to identify areas of higher risk for modern slavery. Building on this initial risk assessment we undertake periodic modern slavery risk assessments to capture changes to Telstra's operations and operating context as our business evolves. In line with the UNGPs, we use four key modern slavery risk factors when assessing risk: country/region, categories/sectors, business models and vulnerable populations to assess where, in relation to Telstra's business units and procurement categories, there is potential risk of modern slavery practices.

We also regularly assess our highest risk areas using insights drawn from our supplier due diligence process and screening tools, grievance tracking, active engagement in human rights forums, stakeholder feedback, media sources and subject matter experts within our teams. We leverage diverse inputs to prioritise and address key risks effectively.

Telstra's main modern slavery risks are:

Risk area	Why it is a risk area
Operations	
Contingent and indirect workforce outside Australia in the Asia-Pacific region (e.g. employees of our indirect delivery partners)	Higher risk business model with Telstra having limited control and visibility over the working conditions of workers not employed directly and located in high-risk countries.
Workers at retail partners and partner business centres	Risk that delivery partners may take advantage of vulnerable workers (e.g. migrant workers or visa holders). Telstra has limited visibility and does not have direct control over the conditions of these workers.
Supply Chain	
ICT products (e.g. devices, accessories)	May be produced by low-skilled and low-wage labour, which may include vulnerable workers such as migrant workers or children in artisanal mines. ICT Products and their components are often manufactured and mined in high-risk countries.
Devices (non-ICT), including medical devices and energy metering devices	May be produced by low-skilled and low-wage labour, which may include vulnerable workers in high-risk countries.
Construction and physical network infrastructure maintenance	May involve low-skilled, low-wage and temporary labour which may include vulnerable workers (e.g. migrant workers or visa holders) and high levels of subcontracting, leading to poor visibility over the supply chain.
Products used to build, support and maintain physical network infrastructure	Produced by low-skilled and low-wage labour, which may include vulnerable workers in high-risk countries. Usually produced by lower tier suppliers where Telstra has limited visibility. Common exploitation practices include forced and child labour and unsafe conditions.
Branded apparel and marketing merchandise	Produced by low-skilled and low-wage labour, which may include vulnerable workers in high-risk countries.
Cleaning and waste management	Involves low-skilled and low-wage labour, with a high proportion of temporary migrant workers and high levels of subcontracting. Common exploitation practices in this industry include withholding wages, excessive overtime and dangerous or sub-standard working conditions.
Transport/logistics	Involves low-skilled, low-wage and temporary labour often relying on subcontracting. Workers may be prone to exploitation by recruiters making it harder to have transparency over worker conditions. Pressure on supply chains caused by increased online shopping, COVID-19 and other world events has increased the potential for exploitation of workers in this industry.
Solar panels and batteries	Higher risk industry subject to modern slavery risks, including the risk of state-imposed forced labour and exploitation of minority groups. Supply chain pressures caused by the increased demand for solar and batteries heightens modern slavery risk.
Carbon offsets	Projects targeted can be in high-risk developing countries and may utilise vulnerable workers in high-risk industries (e.g. solar power project).
Renewable energy projects via Power Purchase Agreements	<p>Higher risk industry subject to modern slavery risks. Products required for renewable energy projects may be produced by vulnerable workers in high-risk countries. This includes risks of:</p> <ul style="list-style-type: none"> state-imposed forced labour and exploitation of minority groups in the solar supply chain exploitation of workers producing balsa wood or extracting minerals used in the manufacture of wind turbines. <p>Supply chain pressures caused by the increased demand for renewable energy projects and products heightens modern slavery risk.</p>

11. Guiding Principle 13 of the UNGPs.

How we address modern slavery risks

In our operations

Employees

We have a global employment framework covering all Telstra Group direct employees. This includes direct employees of owned or controlled entities, even where they have separate policies and processes (such as different leave entitlements and allowances).

Telstra’s global employment framework

Compliance with laws

Telstra’s global employment framework:

- requires compliance with local laws as a minimum.
- covers core employment conditions such as minimum wages, hours of work and leave entitlements.

Telstra has in place payroll systems and compliance controls to help ensure that our employees are paid correctly and in a timely way. This includes wage-related payments such as penalties and allowances and (in Australia) superannuation.

Our payroll arrangements are regularly audited to help ensure ongoing compliance. Major changes to our payroll systems are the subject of rigorous controls and testing.

Telstra periodically reviews the labour laws in locations where we operate to check we meet these requirements. If we identify any gaps in a particular location, we promptly remedy these.

Collective bargaining and consultation

In Australia:

- our direct workforce generally has working conditions set by enterprise agreements
- more than 77 per cent are covered by these collective agreements.

Worldwide:

- we consult with our people before we implement any significant changes to the way we work
- our people have the freedom to form or join a trade union, to bargain collectively and to engage in trade union activities.

Treating our people well

Our global employment framework provides conditions and employment processes that go beyond what is required by local law to help us respect and support the human rights of employees and provide a safe and fair working environment. This includes recruitment procedures to support diverse candidates.

Online recruitment management system

The online recruitment management system applies to the Main Employing Entities and has formal approval gates to help make sure our policies and processes are correctly followed. This includes:

- verifying candidates’ identity
- requiring evidence to confirm their right to work status
- requiring evidence to confirm they meet minimum employment age
- generating contracts that comply with Telstra’s policies and processes, including in relation to pay rates, working hours, benefits and relevant enterprise agreements.



The Telstra Group entities that employ the majority of our direct workforce have additional processes in place to support fair recruitment:

Policy

Telstra’s Main Employing Entities have recruitment policies to help ensure:

- all recruitment decisions are in line with the Telstra behaviours and habits
- recruitment and selection practices are fair and equitable
- all recruitment processes support diversity and inclusion
- we act fairly and consistently when considering rehiring individuals previously made redundant.

Process

The Main Employing Entities and Telstra Purple have a formal recruitment process for our permanent and contingent workforces that all recruiters are required to follow.

When agencies are engaged, we require them to follow these recruitment processes.



For more information on how we respect and support our people, including our approach to health, safety and wellbeing, see the ‘Our people’ section in our 2024 Bigger Picture Sustainability Report available on our [reports page](#).



Management of higher risk operational activities and locations

Some of the activities we undertake and some of our service delivery models are higher risk because we do not have visibility of the working conditions of workers engaged in these. We recognise that when workers are not employed directly by us, we need to implement a robust risk management framework to help ensure worker rights are upheld and appropriate grievance mechanisms are accessible to workers.

Specific risk mitigations for our delivery partners outside Australia

Around 37 per cent of Telstra's workforce is indirect.

These workers are either engaged as contingent workers or through longer term delivery partnership arrangements. The indirect delivery partner service model carries heightened risks for workers as they are not directly engaged by Telstra. This is particularly so where the delivery partners are outside Australia in higher risk countries.

Telstra engages indirect workers:

- to undertake high-volume repeatable activities, such as billing, assurance, activations, people services, payroll, data and analytics, supply chain and procurement
- to manage customer relationships across all assisted and unassisted channels, including contact centres and digital platforms
- in construction, maintenance and design, security, operation of our networks and technology solutions (including Information Technology (IT) applications and operational technology used in our network)
- to provide professional services, including consulting and IT support services.

The largest groups of indirect workers are in Australia, followed by India and the Philippines. India and the Philippines are considered higher risk locations for modern slavery.¹²

To mitigate the risk presented by the indirect delivery partner service model:

- all our delivery partners must sign up to our Supplier Code of Conduct, and can be asked to demonstrate compliance through questionnaires, desktop audits and site visits

- our partners are contractually obliged to comply with the law, including local laws relating to terms and conditions of employment. In India and the Philippines this includes having their own functioning ombudsperson and providing workers with contracts in a language they can understand. Terms and conditions of employment must be clearly set out in employment contracts
- in India, working conditions and benefits must be physically displayed in the workplace, in a language the workers can understand. We collect copies of employment contracts from vendors providing property and facilities management for their workers who work at Telstra premises and arrange for a third-party to audit them on a monthly basis for compliance with labour laws. For larger vendors operating within Telstra premises, we require a monthly declaration that they comply with all applicable labour laws
- employees of our delivery partners with direct access to Telstra systems must complete our Business Essentials Training or lose access to these Telstra systems. This alerts workers to how Telstra expects workers to be treated and to Telstra's Whistleblowing Service should they need to report mistreatment.

12. See "Risk rating" in the Glossary.

Case study: Ensuring fair treatment of agency workers

This year we investigated a complaint from a Telstra agency worker in Australia who claimed following their resignation that their employer was demanding reimbursement for visa sponsorship related costs and withholding their pay. The individual was employed by a tier 3 supplier to Telstra and both a tier 2 and tier 1 supplier were involved with their engagement at Telstra. The demands to the worker came from both the tier 2 and tier 3 suppliers. The individual later confirmed the issues relating to their employer were resolved following interaction with the Fair Work Commission.

This issue represented a breach of Telstra’s Supplier Code of Conduct. We investigated the circumstances around this breach with the Telstra partner (tier 1 supplier) involved and identified a few underlying issues, including a lack of transparency and controls around subcontracting arrangements and due diligence processes that were not robust enough in this case.

We have worked with the Telstra partner to confirm they have implemented additional controls to manage transparency and control around subcontracting.

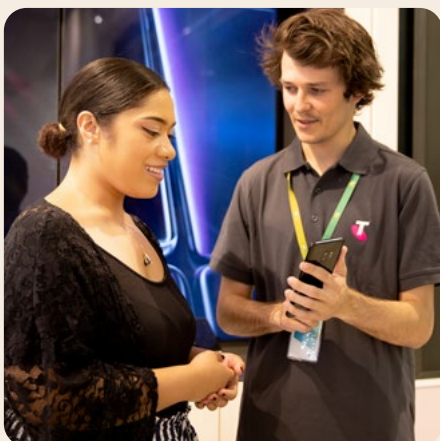
We continue to work with the Telstra partner to confirm:

- whether the findings relating to the matter are systemic
- how they will raise awareness of workers’ rights and grievance processes amongst all workers, including contracted workers
- what additional controls and due diligence will be implemented to help ensure subcontractors comply with Telstra’s Supplier Code of Conduct
- the existence of relevant policies and training specifically prohibiting charging workers for visa sponsorship related costs.

Specific risk mitigations for our retail network

We use a network of stores and business centres across Australia to sell to our consumer and small business customers.

All Telstra branded retail stores, and 76 per cent of Telstra’s business centres, are Telstra-owned and operated. We also have dealership agreements with partner business centres and retail partners, including independently run T-Partner dealers who generally operate smaller dealerships and support regional and Language Other Than English customers. We also have independent dealership agreements with retail partners such as JB Hi-Fi and The Good Guys to sell Telstra products.



We take steps to mitigate the risk presented by our partner business centres and retail partners business model:

Annual attestation	We request our partner business centres and smaller retail partners to complete an annual attestation of compliance with certain terms of their agreement, including compliance with employment and labour obligations. We are progressively rolling out these requests to additional partners.
Training	Partners must complete mandatory training to access Telstra systems. The training sets out the standards and behaviours we expect, and how to raise a concern if these standards are not being met.
Grievance mechanisms	Telstra representatives manage each partner and provide a channel where partners and their employees can raise issues with us. Partners and their employees can also raise issues using the partners’ own grievance mechanisms or Telstra’s Whistleblowing Service.
Audits	We have a contractual ability to audit partners if there are concerns about a partner’s compliance with the terms of their agreement, including the requirement to comply with applicable laws.
Failure to comply	We have contractual remedies if a partner fails to comply with relevant Telstra policies (such as the Supplier Code of Conduct), laws or regulations applicable to their operations. Such a failure constitutes breach of the relevant agreement, and depending on the seriousness of the breach, Telstra’s recourse may include termination of the agreement, clawback of amounts paid or suspension of the partner’s ability to undertake certain sales or service activities.
Dealership and business centre agreements	In FY24, we started to roll out a new standard dealership agreement for our enterprise partners and partner business centres which requires our partners to comply with modern slavery legislation.

In our supply chain

Constructive engagement with suppliers

We regularly work with our suppliers to assess their adherence to our standards. Many of our suppliers have robust risk management processes in place and collaborate with us to meet our requirements.

Where we identify concerns about supplier performance, we engage constructively with the supplier, driving improvements to deliver the best outcomes for the workers we are seeking to protect, the community and the environment. In instances where suppliers are not willing to co-operate, despite our attempts at engagement, we may terminate their contracts or switch to alternate suppliers.

Compliance with the Supplier Code of Conduct and contractual risk mitigation

The Telstra Limited standard Telstra Supply Agreement is in place with most suppliers to Telstra and requires suppliers to:

- comply with our Supplier Code of Conduct and laws regarding modern slavery
- put in place policies and procedures to manage their supply chain's compliance with relevant policies and laws
- provide evidence of their compliance on request.

Telstra has the right to terminate the contract if these provisions are breached.

When making procurement decisions, we consider suppliers' ability to meet the standards in our Supplier Code of Conduct, regardless of whether the Supplier Code of Conduct has been formally incorporated into the relevant contract. We may include additional social, environment or ethical contractual requirements based on the inherent risk of the agreement. For example, we may dictate a specified frequency for sustainability audits where the risk profile warrants.

We provide an online portal specifically for suppliers to disclose conflicts of interest relating to Telstra employees and concerns about working conditions. We review all disclosures relating to the Supplier Code of Conduct provided through the online portal, via whistleblowing reports or otherwise.

Our policies and processes require our team members to manage human rights risks posed by suppliers, including labour rights risks. This includes engaging with suppliers on these risks where they are identified. To assist with this, we developed a guide this year for deeper engagement on these issues. This was a recommended action from a human rights gap analysis completed by external experts in FY23. The guide sets out:

- specific human rights questions to ask at supplier meetings
- potential responses that would indicate the need for further investigation
- actions team members can take to support suppliers to improve their human rights practices
- resources that can be shared with suppliers to support their human rights response.

Case study: Engaging with suppliers

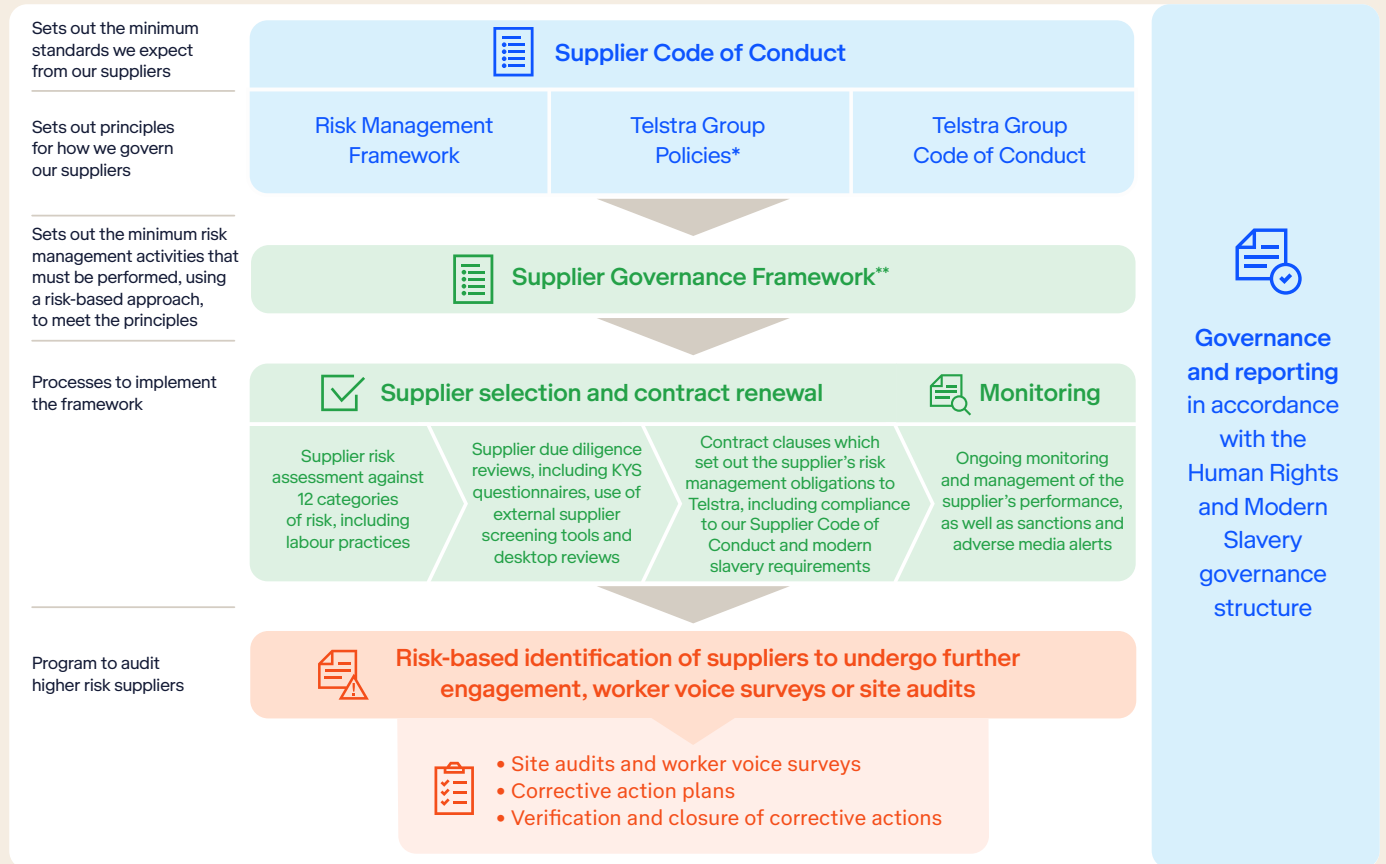
Throughout this year we proactively engaged with one of our suppliers in response to allegations of worker mistreatment within their supply chain. The allegations centred around disputes over working conditions and pay. We took the initiative to express our concerns to the supplier, seeking clarity on how they were managing the risk of worker mistreatment in their supply chain, both generally and specifically in relation to the allegations.

The supplier was cooperative, providing us with a thorough understanding of their labour rights risk management processes, as well as specific details about the allegations and their response to them. We were reassured to find their handling of the incidents was consistent with their robust public statements on managing labour rights risks in their supply chain.

Our experience with this supplier reaffirms the importance of open dialogue and collaboration in promoting fair labour practices in the supply chain, and the benefits of actively engaging with our suppliers, so we can better understand and manage the risk of modern slavery.



The Supplier Governance Framework




* Telstra Group policies such as Health, Safety and Wellbeing, Anti-bribery and Anti-corruption, Conflicts of Interest, Dealing with Suppliers and Other Third Parties and our Human Rights Policy.
 ** Elements of the Supplier Governance Framework have been updated throughout this year, see below for further detail of updates.

The Supplier Governance Framework supports our Dealing with Suppliers and Other Third Parties Policy and sets out the minimum requirements team members must meet to effectively manage risks associated with their supplier engagements. It requires them to:

- identify and assess the inherent risks associated with their supplier engagement, considering the Supplier Risk Categories (see diagram to the right)
- complete due diligence on the supplier using our KYS platform and sanctions and adverse media screening tools, to validate the supplier's practices and risk management capabilities against Telstra's requirements, including our Supplier Code of Conduct
- undertake monitoring and management of the supplier's performance, including ongoing sanctions and adverse media alerts, to help assess compliance to contract requirements. Where warranted, worker voice surveys and/or site audits may also be conducted at the supplier site.

The Supplier Governance Framework governs our centralised procurement process, used by the majority of Telstra's controlled entities¹³. We work with our controlled entities on adopting the Supplier Code of Conduct and the requirements of the Supplier Governance Framework.

 For further information about our subsidiary governance model and consultation within the Telstra Group, see the 'Our approach' section on page 7 and 'How we consult within our group' section on page 25.

Supplier Risk Categories



13. The specific procurement process adopted by a controlled entity will depend on the level of Telstra's ownership, the relevant entity's circumstances, the nature of its operations and its jurisdiction. Telstra Health, Digicel Pacific, Fetch TV and Versent are examples of entities that do not utilise the Telstra Group procurement function or centralised procurement processes.

In FY24, we reviewed and updated our Supplier Governance Framework to address key learnings and improvement opportunities identified in the 12 months prior. Changes included:

- restructuring the presentation of our Framework to make it easier for our people to read and understand their roles and responsibilities
- simplifying the risk management requirements to improve alignment with our buying methods.

To address regulatory changes and technology advancements impacting our risk landscape, we also:

- refreshed our guidance on our Supplier Risk Categories
- developed and ran training for our contract owners on how to perform effective risk assessments. Recordings of the training and the accompanying guidance and resources are available to our contract owners to access on demand via our intranet
- developed additional guidance to support our contract owners with meeting the requirements of the Framework, such as guidance on supplier onboarding and offboarding.

As part of our continuous improvement of supplier governance across Telstra, we are looking to uplift the technology and operating model underpinning our supplier governance and third-party risk management systems in FY25.

Supplier due diligence

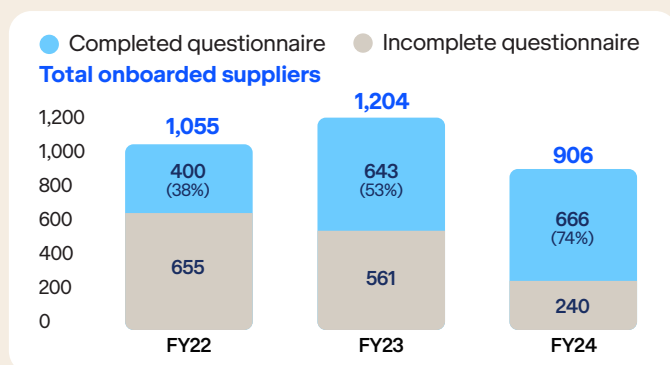
Know Your Supplier Platform

We use an online KYS platform to support our due diligence process for domestically contracted suppliers. The KYS platform hosts our supplier questionnaires relating to our Supplier Risk Categories, including labour practices. Internal and external supplier subject matter experts designed these questions based on industry standards. The platform allows suppliers to:

- respond to our supplier questionnaire through a secure portal
- upload and maintain information about their compliance with Telstra’s Supplier Code of Conduct and their risk management practices, including those relating to labour practices
- provide evidence of their accreditations.

Completion of our KYS questionnaire is a mandatory step for domestically contracted suppliers on both new contracts and contract variations. We continue to work on onboarding our pre-existing domestic contracts to the KYS platform. We focus our efforts on our domestically contracted suppliers as they represent more than 80 per cent of our total spend.

KYS onboarded suppliers¹⁴



We periodically revise the questions in the KYS platform to respond to supplier feedback, regulatory changes and other emerging issues to increase the breadth and depth of oversight into our supply chain.

This year we implemented a modern slavery risk profile rating on the KYS platform. The rating reflects a supplier’s inherent modern slavery risk level, based on their industry and location. We also implemented a compliance check process within the KYS platform to assess modern slavery risk management practices and help identify whether a supplier meets our minimum requirements for labour practices. Using this information and the modern slavery risk profile rating, we identify high-risk suppliers and determine if additional measures are required to address any elevated risks.

Enhanced due diligence

In addition to utilising the KYS platform, we engage a third-party to complete enhanced due diligence (EDD) screening of higher risk suppliers. This includes:

- screening suppliers using publicly available sources
- mapping findings to Telstra’s Supplier Risk Categories in a report for review and remediation
- monitoring screened suppliers on an ongoing basis for subsequent adverse findings.

In FY24, we obtained 55 EDD reports on identified suppliers.

Ongoing monitoring

We have an ongoing monitoring program for all active domestically contacted suppliers to identify potential risks by monitoring against public records, including media reports and civil litigation, regulatory, criminality and bankruptcy checks.

This year our ongoing monitoring program made us aware of:



15 high-risk alerts around **sustainability issues** for **14 active suppliers**¹⁵



Out of these, **five active suppliers** had high-risk alerts relating to **labour practices**



No active suppliers had high-risk alerts relating to **modern slavery**

The high-risk alerts are reviewed by the respective functions, contract owners and supplier relationship owners, and may lead to further due diligence in accordance with the Supplier Governance Framework.

For instances where allegations are raised publicly about unacceptable practices such as forced labour in parts of our supply chain, we engage with suppliers to help ensure workers’ rights are appropriately respected. Pending the outcome of the engagement we may undertake additional actions such as conducting an on-site audit or a worker voice survey.

14. Figures in this infographic are as at 30 June of the relevant year. New suppliers are added to the platform weekly and may complete the questionnaire in the financial year following onboarding. In FY24, we reviewed our supplier list in KYS removing those with no active engagements. For this reason, there are fewer total suppliers showing in FY24, compared to previous years.

15. Sustainability issues relate to health and safety, labour practices, environmental practices, bribery and corruption and modern slavery.

Sustainability audit program

Our sustainability audit program identifies suppliers for further engagement, worker voice initiatives or site audits, based on risks identified through:

- EDD reports
- the KYS platform
- whistleblowing reports
- feedback and reporting of supplier performance and actions from the business
- participation in industry groups focused on human rights and modern slavery
- feedback from stakeholders such as investors
- media attention on instances of exploitation practices.

Worker voice surveys

Telstra uses worker voice surveys to obtain feedback directly from workers on their sentiments relating to:

- grievance mechanisms available at their workplace
- environment, health and safety
- wages and working hours
- gender equality in the workplace
- how they are treated and whether they have experienced harassment
- job satisfaction.

We use an online mobile phone survey, provided and managed by a third-party. The survey questions test whether workers' working conditions meet Telstra's expectations as set out in the Supplier Code of Conduct.

The worker voice survey is anonymous and offers insights on topics that can otherwise be difficult to identify, such as harassment. It can be used independently or to complement audits undertaken at sites. Using mobile technology, the survey can cover a much wider sample size of employees than engaged through the audit process. It allows workers to share their viewpoints and provides Telstra and the supplier who employs them with better visibility of worker wellbeing.

We ask the relevant supplier to promote the survey to its workers ahead of time. This can include:

- printing and distributing cards containing a QR code to workers
- displaying posters prominently before the survey launch
- explaining the survey to workers as anonymous, confidential, fast and easy
- providing the estimated time to respond to the survey.

Where worker dissatisfaction is identified, Telstra works with the supplier to respond to the findings and get assurances that Telstra's expectations outlined in our Supplier Code of Conduct are met. Telstra then verifies completion of these actions.

Number of sites where worker voice surveys undertaken

Categories	FY22	FY23	FY24
Contact centres	4	4	5
Other categories	0	0	4
Total	4	4	9

FY24 worker voice surveys

Categories	Location	FY24	Response rate	
Contact centres	Australia	1	45%	
		1	25%	
		1	40%	
		1	55%	
Other categories	Philippines	1	71%	
		India	1	58%
			1	53%
Other categories		1	65%	
		1	37%	
		Total	9	48%



Case study: Insights from worker voice surveys

In FY24, Telstra conducted anonymous worker voice surveys at five sites operated by a contact centre supplier, gathering over 800 responses, and at four sites operated by an indirect business process outsourcing supplier, gathering over 500 responses.

The surveys identified dissatisfaction across all nine sites regarding wages, working hours, grievance mechanisms and job satisfaction. Workers felt their wages were not fair for the work they do and that wages calculation was not clear. Workers also noted management's unresponsiveness to their feedback and expressed unhappiness with training and overall job contentment.

To respond to these findings the contact centre supplier has agreed to:

- increase wage transparency, job flexibility and coaching
- introduce new training and training spaces
- improve communication with employees through new systems and a leader feedback mechanism.

The indirect business process outsourcing supplier has agreed to:

- increase wage transparency and awareness of wellness programs
- promote skill uplift programs and nominate representatives to support with workplace issues
- make grievance mechanisms more easily accessible to employees.

The suppliers have also been required to provide regular updates to Telstra on the progress of their actions to address workers' concerns.

The worker voice surveys showed better results in other areas, including the workers' perception of their safety at work, understanding of emergency procedures, openness to share complaints, existence of trusted feedback channels and freedom from sexual harassment and abusive behaviour.

Worker voice surveys are a useful tool for gaining insights directly from workers on their working conditions and sentiments. It not only benefits Telstra, but also the supplier, guiding them on where to improve to help create a fair and sustainable work environment.

Site audits

This year¹⁶:



57 sites across 29 suppliers were audited using the JAC framework



Telstra led 6 site audits



The remaining **51 audits were led by JAC peers**

Supplier Tier	FY24
Audits on tier 1 sites	28
Audits on tier 2 sites	25
Audits on tier 3 sites	4
Total sites audited	57

Site audits are conducted using independent auditors and align with industry standards such as those set by RBA and JAC.¹⁷ The audits focus on health and safety, environment, human rights including labour rights and modern slavery indicators and business ethics. The audits include worker interviews, site visits to assess labour conditions and documentation reviews.

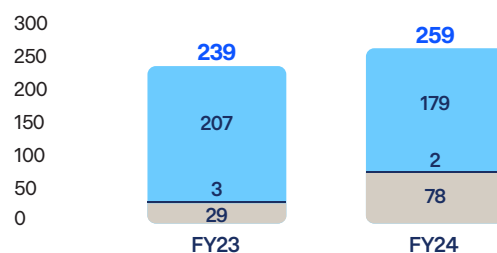
Number of independent third-party sites audited by category

Categories	FY22	FY23	FY24
ICT sector ¹⁸	29	34	50
Construction and physical network infrastructure maintenance ¹⁹	1	2	1
Other categories ²⁰	8	5	6
Total	38	41	57

Number of priority and major findings by category²¹

- ICT sector
- Construction and physical network infrastructure maintenance
- Other categories

Total priority and major findings



16. Telstra reports the number of audits conducted by Telstra and JAC peers (under the JAC framework) on suppliers to Telstra. In FY24, there were no supplier led audits. The disclosed metric is derived from audits reported by JAC. From this we extract the subset which pertains only to Telstra suppliers that have been conducted during this financial year.

17. For more information about JAC, see the 'Industry cooperation on combatting modern slavery' section on page 23.

18. In FY24, audits in the ICT sector led by Telstra were conducted on contact centres. JAC peer led audits comprised of audits on manufacturing facilities of devices and network products.

19. In FY24, audits in the construction and physical network infrastructure maintenance category comprised of an audit on an infrastructure field services provider led by Telstra.

20. In FY24, audits in the other category comprised of a Telstra led audit on a merchandise provider. JAC peer led audits comprised of audits on suppliers providing professional services, as well as those in media and marketing.

21. Audits identify 3 tiers of findings: priority being the most serious, followed by major and then minor.

FY24 site audits with priority and major findings by location



As well as relying on third-party audits, our Quality, Health, Safety, Wellbeing and Environmental auditors undertake internal audits on our construction and physical network infrastructure maintenance suppliers where health and safety is a significant risk. This includes contract management system audits and onsite health, safety and environment audits.

In FY24, we undertook 45 management system audits and more than 3,460 health, safety and environment audits.

Acting on our due diligence findings

We review the findings of all our site audits. Where we identify an issue, we work with the supplier to develop remediation plans with agreed timeframes. We then verify the supplier has carried out the corrective actions.

We did not identify any instances of modern slavery through our sustainability audit program in FY24.

Findings from the FY24 audits conducted identified:



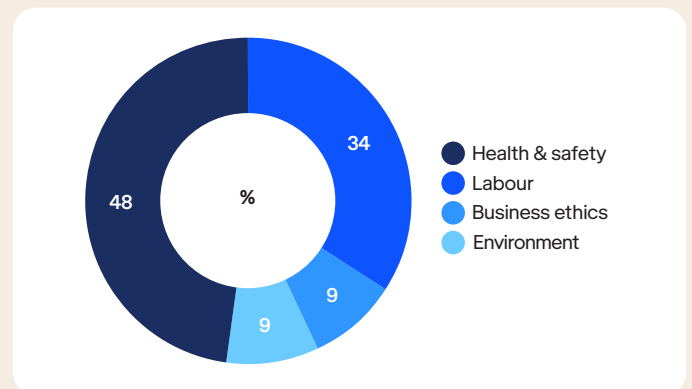
259 priority and major findings



79% of sites or 83% of suppliers audited had priority or major findings



FY24 site audits: priority and major findings by type



Health and safety and working hours are the most common areas of concern. Excessive work hours and poor health and safety practices can lead to further risk of harm to people if they are not remediated.

In FY24:



201 corrective actions relating to priority and major findings reported in this or previous years' findings **were closed**



This includes **closing 140 (54%) of corrective actions relating to priority and major findings** identified in this year's audits.

Where suppliers are not willing to improve their performance in a timely manner, despite our attempts at engagement, we may terminate supply contracts or switch to alternate suppliers.

Case Study: Improving labour practices in our promotional products supply chain

In FY24, we undertook a site audit on Telstra's primary promotional merchandise supplier. Branded promotional items such as event gifts and store uniforms help shape Telstra's distinctive brand identity. We recognise the heightened risk of worker exploitation at facilities that manufacture promotional products, particularly in regions with higher modern slavery risk.

In addition to operating in a high-risk industry, Telstra's KYS questionnaire assessed the risk related to this supplier as high in the areas of health and safety, business ethics, environment and labour. Consequently, additional due diligence was deemed necessary and an onsite audit was carried out on the supplier.

The audit was conducted by an independent third-party auditing firm and focused on a tier 2 facility located in Asia. Both our tier 1 supplier who facilitated the audit for us and the tier 2 supplier being audited were cooperative throughout the audit process. The audit found numerous findings particularly in the categories of labour practices and health and safety.

Labour practices issues ranged from excessive overtime to employee rules stating wages may be deducted for disciplinary reasons (such as absenteeism and smoking). The audit also noted an absence of written work agreements and inadequate record-keeping. Health and safety concerns included inadequate or no policies, unsafe work practices and workers not wearing provided personal protective equipment.

In response to these findings, a corrective action plan has been agreed with the facility, outlining specific measures and timelines for rectifying the identified issues. This includes putting in place legally compliant written labour contracts for all workers, implementing measures to reduce excessive overtime, revising wage policies, ceasing wage deductions for disciplinary purposes, enhancing safety training and establishing formal policies addressing various workplace issues. To date, progress has been made in closing 63 per cent of priority and major corrective actions which equates to 50 per cent of total corrective actions identified during the audit.

Telstra has put ongoing monitoring mechanisms in place for the remaining corrective actions. This includes continuous engagement with our tier 1 supplier to influence the tier 2 supplier, regular meetings with the tier 1 supplier to track progress, documentation review by the independent auditing firm and, if necessary, follow-up audits. Telstra is also taking the learnings from the audits to work with our tier 1 supplier to strengthen how they support their suppliers with meeting labour practices and health and safety standards as set out in Telstra's Supplier Code of Conduct.

Working with this supplier has underscored the inherent risks associated with the promotional products industry. However, despite the higher than usual number of findings in this audit, the supplier has been collaborative and committed to improving their practices and labour conditions. This constructive engagement provides Telstra with the incentive to keep engaging this supplier whilst actively driving improvements in the working conditions of the affected workers.

Case Study: Protecting workers in our contact centres

In FY24, Telstra conducted site audits on four facilities operated by a tier 1 supplier providing contact centre outsourcing services. These facilities handle consumer faults, sales and service, small business operations, messaging, and back-of-house operations on behalf of Telstra, forming a crucial part of Telstra's service ecosystem.

The decision to audit this supplier stemmed from past concerns regarding the supplier's labour practices, which were highlighted through worker voice surveys and other communication channels. Engaging an independent third-party auditing firm, Telstra conducted on-site audits of the four tier 1 facilities located in both Australia and India. While the audits did not reveal any labour-related issues, they did pinpoint areas for improvement in health and safety and environmental practices, particularly within the Australian facilities.

In response to these findings, corrective actions have been agreed with the audited facilities. These include enhancing health and safety training, reviewing and enhancing existing policies, devising emergency response strategies and addressing environmental concerns. To date, 36 per cent of priority and major corrective actions have been closed.

Telstra remains actively involved in overseeing the resolution process, maintaining regular communication with the supplier on these matters, conducting progress-tracking meetings and facilitating documentation reviews by the independent auditing firm. We may also conduct follow-up audits if necessary.

This supplier has been responsive and prompt to address the findings and issues raised. This gives us assurance that we have a willing partner in this supplier to improve treatment of workers in line with Telstra's Supplier Code of Conduct.

Update on our previous audit case studies

In FY22 and FY23, we reported on audits we undertook on various suppliers. While we have been able to close some of the corrective actions, we have encountered challenges with others and have not been able to close out all the findings. The lack of progress and unwillingness to address findings by one of the audited facilities has led us to decline the use of that site to supply to us.

With the remaining sites, we are actively engaging with both tier 1 and tier 2 suppliers through regular meetings to track progress. In addition, an independent third-party auditing firm is undertaking document reviews to verify the closure of corrective actions and, if necessary, we will conduct further on-site audits to identify if these issues have been resolved or are ongoing.

Despite the challenges involved, where suppliers show a willingness to engage with us on these matters, we remain committed to working collaboratively to improve and safeguard the working conditions of our supply chain workers.



Specific risk mitigation for carbon offsets

We recognise that carbon offset projects can be vulnerable to human rights abuses such as modern slavery.

We have limited influence over how projects are operated, as we have purchased carbon offsets primarily through third parties from existing projects. For this reason, our due diligence in this area follows different processes to those set out in our Supplier Governance Framework. The most significant influence we have is our decision whether to proceed to buy the offsets following due diligence.

Telstra has a Carbon Offset Acquisition Guideline to support investment in high-integrity offsets. We consider modern slavery through two principles:

- **Telstra aligned** – alignment to Telstra sustainability strategy, policies and brand by ensuring compliance with Telstra's Supplier Code of Conduct
- **sustainable development** – positive environmental and social impact, by ensuring social safeguards such as community engagement and consultation.

Due diligence includes country risk assessments and database searches for litigation and adverse media. If any concerns have been uncovered in this due diligence, including relating to exploitation of workers, Telstra has not proceeded with the acquisition of the carbon offsets.

From 1 July 2024 Telstra Group will no longer be offsetting the emissions from our operations. We will continue to offset emissions associated with mobile phone plans and mobile broadband plans until 31 August 2024.



For more information on our climate strategy see the 'Sustaining our planet' chapter of the 2024 Bigger Picture Sustainability Report available on our [reports page](#).

Specific risk mitigation for renewable energy projects

Telstra has made a commitment to enable renewable energy generation equivalent to 100 per cent of its consumption by 2025. As part of this commitment, Telstra enters into long-term power purchase agreements with new renewable energy projects. To assess the potential for modern slavery risks, Telstra undertakes due diligence by:

- using a supplier questionnaire which addresses modern slavery risk
- reviewing a supplier's relevant policies
- asking specific questions on modern slavery risk management at the request for proposal stage and assessing the responses
- incorporating clauses into its power purchase agreements that require suppliers to comply with its Supplier Code of Conduct, and relevant Telstra Group Policies, including its human rights policy, which addresses modern slavery risk
- Telstra's contract management team regularly assessing ethical business risks through the course of management of the contract.

If our due diligence process identifies that a counterparty is not adequately managing modern slavery risk, we do not proceed with the project. We have, for example, disengaged from projects due to factories located in higher risk areas, corruption charges and weak anti-slavery commitments.

Specific risk mitigation for solar panel purchases

Telstra buys and installs solar panels each year as part of our mobile equipment installations and network upgrades across Australia and the wider region. Our tier 1 suppliers in Australia source their panels overseas. We are aware of the risk of

state sponsored forced labour and worker exploitation in the solar panel supply chain and have encountered challenges when seeking to audit solar panel manufacturers beyond tier 1. Our experience highlights the lack of transparency in the solar panel industry and the exposure to modern slavery risks with lower tier suppliers.

To mitigate this risk, we have additional controls to assess whether suppliers adhere to our standards, including:

- cross-referencing potential solar panel suppliers against suppliers already audited by us or other JAC members, and those with past allegations of worker exploitation
- engaging with tier 1 solar panel suppliers on this issue early in the procurement process. We do this by explaining that worker conditions, and difficulties auditing, are a concern to Telstra and asking suppliers how they plan to manage this, prior to committing to the supplier.

In FY24, we developed guidance on how to raise our modern slavery concerns with solar panel suppliers and how to identify solar panel suppliers and manufacturers with known risks.

Despite ongoing efforts, we have been unable to complete audits on a number of lower tier manufacturers, identified for audits in previous years. As a result, Telstra has made the decision to not accept supply from lower tier manufacturers that declined our requests to audit their facilities. In these instances, we continue to engage with the relevant tier 1 supplier on its management of modern slavery risk in its supply chain.

Our training

We have several mandatory training courses in place so our people can help us prevent modern slavery in our operations and supply chains.

Training	Description	FY24 completion rate
Business Essentials Training	<p>This training:</p> <ul style="list-style-type: none"> is completed by all our employees, directors and most of our contractors, consultants and partners covers key obligations under our Code and Group Policies including Telstra's Human Rights Policy includes a human rights module to increase awareness and capability of our people in relation to human rights and modern slavery risks relevant to Telstra and their roles. <p>Consequences for not completing training by the due date, without a valid reason, range from system access suspension through to an impact on the individual's annual performance rating which in turn can impact remuneration reviews.</p>	99.9% of our total target audience completed the mandatory refresher training.
Supplier Governance Framework Training	<p>This training:</p> <ul style="list-style-type: none"> is mandatory for all staff who have direct contact with suppliers and our executive leadership team helps our staff apply our Supplier Governance Framework effectively raises awareness of our policy requirements impacting supplier management, including our Supplier Code of Conduct offers an overview of staff responsibilities and the resources available to manage suppliers across the Supplier Risk Categories, including labour practices is usually completed on a yearly basis. However, in FY24, this training was not run while the Supplier Governance Framework was updated. Refreshed training content aligning with the updated Framework will be rolled out in FY25. 	N/A
Addressing Modern Slavery Training	<p>This training:</p> <ul style="list-style-type: none"> is mandatory for our procurement team, as well as others within the business who approve spending or labour hire decisions or deal with high-risk areas helps our people understand what modern slavery might look like in our value chain, identify red flags and explain how to take action if they suspect there is a risk of modern slavery has previously been done on a yearly basis. However, in FY24, we transitioned to a biennial training model. Under this model, all existing targeted roles undergo training every two years, while new hires in high-risk roles are trained in the intervening years. FY24 was a year targeting new hires only. 	95% of people in roles targeted for mandatory training completed the training. ²²
Procurement Principles Training	<p>This training:</p> <ul style="list-style-type: none"> is mandatory for all the procurement specialists who support us with complex high-value purchases helps procurement specialists understand their responsibilities. These responsibilities include assessing potential supplier risks, such as labour rights risk, and supporting our social commitments including those relating to human rights and modern slavery provides information on ensuring compliance with our Dealing with Suppliers and Other Third Parties Policy. 	100% of procurement specialists completed the training.

Moving towards a survivor-centric approach

We acknowledge the importance of understanding the experience of survivors in shaping our risk mitigation processes. This year, we collaborated with a charity supporting survivors to refine our Addressing Modern Slavery Training. We aimed to understand the insights of those working with survivors, to help design our training so it is respectful of survivors and fosters an outcome-driven mindset in Telstra team members. For instance, we updated some of our case studies to highlight not just the narrative of victimhood and rescue, but also the survivor's journey of reclaiming their personal freedom, achieving their ambitions, and at times leveraging their experience to advocate against modern slavery and campaign for change.

22. Remaining 5% are individuals who haven't completed training as at 30 June but are still within the 4-week timeframe allowed for completion.

Grievance mechanisms and remediation

We are committed to providing for or cooperating in the remediation of any human rights impacts, including those related to modern slavery which we have caused or contributed to. The grievance mechanisms we have provide an avenue for affected individuals and others to raise concerns with us directly and enable remediation. Telstra supports a culture where everyone has a voice, can contribute and is able to speak up if they see something that is not right.

Internal procedures

We encourage employees to raise any concerns they have with their one-up manager or alternatively via the 'Ask HR' tool or a dedicated intranet page. The dedicated intranet page includes information and links to report concerns relating to:

- employment conditions
- discrimination, bullying, harassment, sexual harassment and victimisation in the workplace
- work-related health, safety, wellbeing, environment and physical security.

Issues are recorded securely and assessed by subject matter experts and operational management with support from the Chief Risk Office where required.

Where possible, we keep relevant employees informed of the outcome and what we are going to do differently.

Issues relating to modern slavery are investigated in consultation with representatives from Telstra's sustainability team, procurement team, legal team and other key stakeholders as required.

Whistleblowing

We have a confidential Whistleblowing Service where people can report their concerns anonymously via phone or webform. The service is supported by our Whistleblowing Policy. Professional investigators and case managers investigate eligible reports. Telstra's Whistleblowing Committee, which is chaired by the Group Company Secretary, receives whistleblowing disclosures, oversees the related investigations and reports to the Audit and Risk Committee of the Board.

We received 213 whistleblowing reports in FY24. Of these, allegations in 40 reports were substantiated in whole or in part. None substantiated an instance of modern slavery.



For more information on our whistleblowing process, see our 2024 Bigger Picture Sustainability Report available on our [reports page](#).



To report a matter, please visit [Telstra's Whistleblowing Service](#).

Telstra's Whistleblowing Service can be used effectively for raising and addressing issues beyond Telstra's direct workforce. There have been instances where reports received via Telstra's Whistleblowing Service have related to working conditions of Telstra's indirect workforce and prompted audits or investigations of suppliers and corrective actions.

Grievance mechanisms in our supply chain

We recognise the challenges in raising awareness of Telstra's Whistleblowing Service to workers across our supply chain. Therefore, we expect and check our suppliers have their own effective grievance mechanisms through:

- our Supplier Code of Conduct which requires suppliers to provide their workers with grievance mechanisms that are accessible, culturally appropriate and communicated in a language that workers understand
- site audits which verify that such grievance mechanisms are available and have been communicated to workers
- our worker voice surveys which include questions on grievance mechanisms and how comfortable workers feel about using the grievance mechanism.

Industry cooperation on combatting modern slavery

We work with the following organisations as members to combat modern slavery and drive improvements in industry sustainability practices, including in relation to modern slavery risk.

Organisation	Detail
Joint Alliance for Corporate Social Responsibility (JAC)	<ul style="list-style-type: none"> • JAC is an association of 27 global telecommunications operators that share resources and best practices to develop long-term corporate social responsibility implementation within the ICT supply chain globally. • JAC pools the results of site audits of common suppliers. JAC's audits aim to verify that suppliers comply with internationally recognised sustainability standards within global supply chains, including in relation to labour rights and the prohibition of modern slavery. • Telstra joined JAC in 2018 and has two current JAC board appointments.
Global System for Mobile Communications Association (GSMA)	<ul style="list-style-type: none"> • GSMA is a global organisation unifying the mobile ecosystem to deliver innovation that helps business and society thrive. • This year we continued to work with GSMA to support the adoption of their mobile industry ESG reporting framework specific for mobile operators by sharing best practice and learnings with other GSMA members. The Metrics for Mobile framework features ten industry specific key performance indicators, including sustainable supply chain. Telstra reported against the new framework in FY23, as an early adopter.
Telco Together Foundation (TTF)	<ul style="list-style-type: none"> • TTF is an Australian telecommunications industry foundation with 30 Australian telco members. It was founded in 2012 to enable the telecommunications industry to make a significant social contribution within Australia. Modern slavery is one of three focus areas for TTF. • We work cooperatively with TTF and its members to reduce the risk of modern slavery, share best practice cases and explore ways we can jointly combat modern slavery risk in the telecommunications industry's supply chains.
UN Global Compact Network Australia (UNGCA) Modern Slavery Community of Practice	<ul style="list-style-type: none"> • The UNGCA Modern Slavery Community of Practice is a small interactive forum that meets quarterly to enable sharing, learning and discussion on the opportunities and challenges we face in relation to managing modern slavery risk. • This forum helps us to understand how to improve our modern slavery risk management program. Members come from different industries allowing us to learn and share across the Australian business community.



How we check the effectiveness of our actions

The table below explains how we assess the effectiveness of our actions across what we identify as the six key components of an effective response.

Key component	We assess the effectiveness of actions in this area by:
Coordinated internal response	<ul style="list-style-type: none"> Monitoring the progress of our response to modern slavery through our Human Rights Working Group and relevant reporting to the Audit and Risk Committee of the Board. Reporting material worker exploitation related compliance breaches to the Audit and Risk Committee of the Board. Consulting with entities/business units across the Telstra Group as part of the preparation of this statement. This helps us to identify any gaps in coordination, communication and our response across our corporate group.
Clear and embedded policies	<ul style="list-style-type: none"> Regularly reviewing relevant policies to assess their ongoing relevance and applicability. These reviews include a consideration of identified breaches or investigations of misconduct. Auditing selected suppliers to assess their implementation of our Supplier Code of Conduct.
Training for our people	<ul style="list-style-type: none"> Regularly reviewing the target training audience. Monitoring training completion rates to understand awareness levels across the Telstra Group. For role specific Addressing Modern Slavery Training, we ask participants to rate the training's impact on their understanding.
Robust risk assessment and supplier engagement processes	<ul style="list-style-type: none"> Annually reviewing our Supplier Code of Conduct and Supplier Governance Framework to confirm they effectively mitigate modern slavery risk in our supply chain. Monitoring supplier issues (including those identified during our onsite audits). Monitoring metrics around each step of the due diligence process, including the number of suppliers monitored in our EDD program, onboarded via our KYS platform, identified for further due diligence via the sustainability audit program and audited. Tracking site audit results (both number of findings and number of resolutions), score rating of audits (excellent, good, conditionally accepted or poor), corrective action plans to confirm they have been remediated and overdue corrective action plans.
Trusted and accessible grievance mechanisms	<ul style="list-style-type: none"> Tracking the number and types of complaints (including complaints relating to modern slavery) received through our whistleblowing reports and HR grievance mechanism and any trends. Tracking the number of investigations and substantiated claims from whistleblowing reports and HR grievance mechanism. Checking supplier grievance mechanisms as part of site audits and worker voice surveys.
Focus on continuous improvement	<ul style="list-style-type: none"> Reviewing expert third-party analysis of statements to assist us to benchmark and improve our modern slavery response. Identifying good practice trends through our participation in JAC, TTF and UNGCNA.



How we consult within our group

Consultation

In FY24, we continued our consultation process with a number of our owned or controlled entities including Versent, which we acquired in FY24.

We prioritise Telstra Group owned or controlled entities for engagement on modern slavery risk based on:

- whether they are reporting entities
- extent of their integration with Telstra systems
- whether they have employees
- the nature of their activities.

The consultation process may include:

- requesting the subsidiary complete a self-assessment questionnaire to assess how effectively they are managing the risk of modern slavery in their operations and supply chain
- meetings with key persons to support a modern slavery risk assessment
- providing guidance on risk level and possible actions to mitigate identified risk areas
- supporting modern slavery risk mitigation uplift efforts.

Before this statement was prepared, we informed directors from all entities within the Telstra Group about Telstra's responsibilities under the modern slavery legislation and our reporting process. In addition, management of Telstra Group entities reviewed and approved the sections that pertained to them.

New acquisitions

We consider modern slavery risk when we make significant acquisitions. We assess modern slavery risk before we make an offer and, where appropriate, undertake confirmatory due diligence and put in place uplift measures after we acquire a target entity. This process may include the steps set out in the 'Consultation' section above. Newly acquired entities may also adopt Telstra Group Policies and processes in accordance with our Group Policy Governance Framework and Group Governance Operating Model.

Human rights due diligence guidance for M&A

In FY24, we launched a guide to assist Telstra's central M&A team and supporting teams identify and address human rights issues, including modern slavery during diligence. This was a recommended action from a human rights gap analysis completed by external experts in FY23. The guide sets out specific actions to be taken to identify and manage human rights risks in M&A transactions. It links to resources that can be used by these teams to assist human rights due diligence. It also includes background information on what are human rights, why it is important to consider them when undertaking M&A transactions and how human rights risks might arise in an M&A transaction in a Telstra context.

Case study: Fetch TV

After acquiring a 51 per cent controlling interest in Fetch TV in FY23, we consulted with key personnel to understand its modern slavery risk. We worked with Fetch TV to put in place additional steps for a plan which built on its pre-acquisition modern slavery risk mitigation work. In FY24, we continued to consult with Fetch TV to support its uplift efforts.

Fetch TV has now:

- adopted or aligned the majority of its policies with the Telstra Group Policies
- progressed its implementation of a supplier questionnaire with questions relating to modern slavery. Fetch TV has finalised the form of the questionnaire and will roll it out in FY25
- rolled out modern slavery training to all executives and managers whose role involves Fetch TV's supply chain. This training had a 100 per cent completion rate in FY24
- engaged with its set top box manufacturers (a higher risk area in its supply chain) to satisfy itself of their modern slavery risk. Fetch TV confirmed their compliance with SA8000 standard and reviewed a summary of a JAC audit relating to one of these suppliers. While the information provided did not raise any modern slavery concerns, Fetch TV will work with Telstra to source the full version of the audit to satisfy itself that the supplier has no corrective action plans outstanding
- implemented an updated standard agreement for key areas of the business which contains provisions addressing modern slavery risk, including where applicable provisions for site visits and requirements for audits. These modern slavery-specific provisions are included in its new contract with a set top box manufacturer, an area that it identified as having higher modern slavery risk
- set up processes to track completion rates of modern slavery training.



In FY25, Fetch TV will continue its uplift efforts by:

- finalising the implementation of a supplier code of conduct aligned with Telstra's Supplier Code of Conduct
- rolling out the new supplier questionnaire to new suppliers and to existing suppliers at the point in time at which new terms and conditions of agreement are entered into with questions relating to modern slavery risk, and embedding it in its supplier onboarding processes
- providing annual refresher training to identified relevant employees on modern slavery and ensuring that new employees are trained
- ensuring all agreements issued by Fetch TV contain provisions addressing modern slavery risk, and on a case by case basis, contracts include terms providing for site visits and audits
- working with Telstra to source the full version of the JAC audit of its set top box manufacturer to satisfy itself that the supplier has no corrective action plans outstanding
- implementing a process to report compliance breaches to the applicable management representative, track any incidences of modern slavery concerns and formally consult with other entities in the Telstra Group on modern slavery risk.



Differences in the Telstra Group

Certain Reporting Entities and owned or controlled entities in the Telstra Group are not fully integrated and have taken different actions to assess and address modern slavery risk. See the 'Consultation' section above for how we address differences in our owned or controlled entities. Details of the key differences in the approach of the Reporting Entities are set out below.



Who Telstra Health is

- Leading provider of digital health solutions, including clinical and administrative systems, health data analytics, population health solutions and information exchange platforms.
- Works with care providers in the hospital, health service, pharmacy and aged and disability care sectors to connect health information, clinicians and consumers.
- Has a direct workforce of 1,347 people across Australia, India, the United Kingdom, Canada, the Kingdom of Saudi Arabia, the Philippines, Vietnam, Ukraine and Bahrain.
- Has approximately 500 active suppliers located in 22 countries.
- Main categories of spend are contracted workers (mostly software developers, engineers and data analysts), an Australian-based contact centre, medical equipment, IT hardware and spend related to its offices.

Telstra Health's modern slavery risks

- In FY22, Telstra Health undertook a risk assessment of its operations and supply chain.
- Telstra Health identified the procurement of medical devices as a higher risk area along with the international operations (especially in the Middle East) of its owned or controlled entities. Otherwise, its risk areas are consistent with the Telstra Group.
- Telstra Health has prioritised medical devices and marketing merchandise for further due diligence. See 'Telstra Health's FY25 commitments' below.
- Telstra Health acquired two significant entities with increased modern slavery risk in FY22:
 - MedicalDirector develops and supplies practice and clinic management software solutions and publishes AusDI, an Australian medical information database. It has certain outsourced IT development labour arrangements in India, Vietnam and Ukraine, countries with heightened modern slavery risk
 - PowerHealth develops and supplies cost management software solutions designed for hospitals and healthcare providers and operates in higher risk jurisdictions such as Bahrain and Saudi Arabia as well as lower risk jurisdictions including Australia and Canada.

How Telstra Health addresses modern slavery risks

- **Internal policies:** Telstra Health has adopted some of the Telstra Group Policies including the Code, Human Rights Policy, Supplier Code of Conduct and Whistleblowing Policy. Telstra Health does not utilise the Telstra Group procurement function or centralised procurement processes, however it leverages some Telstra suppliers and contracts for purchases.
- **Vendor onboarding:** Telstra Health conducts due diligence on all its suppliers including requiring each new supplier to complete a questionnaire covering their approach to and mitigations against modern slavery risks.

In FY24, Telstra Health:

- embedded the review and assessment of the modern slavery questionnaire into its Accounts Payable process by including this in its new vendor form, and created a more detailed questionnaire for higher risk suppliers. Payment of suppliers is contingent on receiving a completed vendor form with no flags. The detailed questionnaire is provided to international suppliers and local suppliers that it considers to be high-risk
- rolled out an updated vendor form which includes guidelines on when to use the longform or shortform questionnaire, the review and escalation process
- launched guidance material for its procurement team on how to assess whether a supplier is high-risk, and set up quarterly meetings with relevant internal stakeholders to track completion rates and the effectiveness of the detailed questionnaire
- issued the detailed questionnaire to all new marketing merchandise and medical devices suppliers.
- **Audit:** In FY23, Telstra audited one of Telstra Health's two marketing merchandise suppliers as part of a broader Telstra Group-wide audit. In FY24, Telstra Health reviewed the results of the completed supplier audit. Telstra Health is working with Telstra to help rectify some issues that were identified. See 'Case Study: Improving labour practices in our promotional products supply chain' on page 20 for the Telstra Group response to this audit.
- **MedicalDirector:** Telstra Health integrated MedicalDirector into Telstra Health from a policy and governance perspective in FY23.
- **PowerHealth:** In FY24, all Australian PowerHealth employees moved to Telstra Health employment contracts and PowerHealth adopted Telstra Health internal and supplier-facing policies for domestic operations. PowerHealth will adopt relevant Telstra Group Policies applicable to its international operations in FY25.
- **Subsidiary uplift:** The Telstra Health legal and risk teams regularly consult with all its subsidiaries on modern slavery risk to help ensure compliance with Telstra Health's expectations.
- **Specific risk assessments:** Telstra Health completed the risk assessments of both subsidiary groups and found that they generally have similar risk profiles to Telstra Health. Exceptions include that PowerHealth procures office services and accommodation services in Bahrain and accommodation services in the Kingdom of Saudi Arabia, which Telstra Health identified as higher risk. In FY25, it will roll out its longform modern slavery questionnaire to these suppliers to better assess this risk. PowerHealth and MedicalDirector also have an indirect workforce of high-skilled professional staff, and professional services (including recruitment services) suppliers, in higher risk jurisdictions. Telstra Health has initiated a review of its recruitment services providers to confirm they do not engage in any unacceptable recruitment practices and will continue this monitoring in FY25.
- **Training:** Telstra Health employees undertake Business Essentials Training on a yearly basis (and achieved a 100 per cent completion rate for FY24). Relevant employees undertake Addressing Modern Slavery Training.

How Telstra Health checks the effectiveness of its actions

- Reports any known or suspected compliance breaches to the internal Telstra Health risk and legal team and to the wider Telstra Group as required.
- Regularly reviews policies and incorporates supplier and Telstra feedback into its modern slavery response.
- Tracks any complaints received via whistleblowing and HR mechanisms.
- Telstra Health legal and risk teams record and track material human rights incidents should they arise.

- Holds quarterly meetings between the legal, risk and accounts payable teams to monitor completion of supplier modern slavery questionnaires, check that all flags are dealt with and monitor process effectiveness.
- Monitors completion rates for relevant training.

How Telstra Health consults within its group

Telstra Health's owned or controlled entities were included in the consultation processes carried out by the broader Telstra Group.

Telstra Health's progress

● Achieved ● In progress ● Not achieved

FY24 commitment	Progress
Embed review and assessment of the existing modern slavery questionnaire into its accounts payable process.	● Telstra Health embedded the shortform questionnaire into its Accounts Payable process and launched guidance material on the use of these forms to its relevant teams. See 'How Telstra Health addresses its modern slavery risks' above for further details.
Assess the results of the in-progress audit of one of Telstra Health's higher risk suppliers.	● Telstra Health reviewed the findings from the audit and began working with Telstra's supplier governance team to progress corrective action plans for the issues that were identified. See 'How Telstra Health addresses its modern slavery risks' above for further details.
Create a more detailed questionnaire for higher risk suppliers and embed the use of this into its supplier governance processes.	● Longform questionnaire launched and embedded into the accounts payable process. See 'How Telstra Health addresses its modern slavery risks' above for further details.
Arrange for PowerHealth to adopt all Telstra Group Policies that have been adopted by Telstra Health.	● PowerHealth's Australian business adopted all Telstra Group Policies which apply to Telstra Health in FY24. PowerHealth's international businesses will adopt Telstra Group Policies in FY25. See 'How Telstra Health addresses its modern slavery risks' above for further details.
Complete a detailed risk assessment for PowerHealth and MedicalDirector including in relation to international operations.	● Telstra Health conducted modern slavery risk assessments of MedicalDirector and PowerHealth in FY24. See 'How Telstra Health addresses its modern slavery risks' above for further details.

Telstra Health's FY25 commitments

In FY25, Telstra Health will:
Continue to work with Telstra to influence the audited supplier to rectify the issues identified in the audit (see 'Telstra Health's progress' above for further details)
Issue its new longform modern slavery questionnaire to: <ul style="list-style-type: none"> • suppliers of PowerHealth and MedicalDirector that it identifies as higher risk • existing marketing merchandise and medical devices suppliers • existing international suppliers
Roll out an instruction manual for Telstra Health's Procurement team to require the use of the longform modern slavery questionnaire as a default for domestic suppliers in industries identified as higher risk (including medical devices and marketing merchandise suppliers)
Assess PowerHealth's recruitment services providers to ensure they do not engage in unacceptable recruitment practices
Implement Telstra Group Policies across PowerHealth's international operations
Put in place further governance processes in its procurement system to check the effectiveness of its modern slavery risk mitigation measures, including automated assessment of supplier questionnaires to screen for higher risk suppliers and a quarterly review of all supplier questionnaires by the legal and risk teams



Who Digicel Pacific is

- Biggest mobile operator in the South Pacific, providing mobile phone, ICT services and operates telecommunications infrastructure in the South Pacific region.
- Has a direct workforce of approximately 2,000 employees across Papua New Guinea (PNG), Fiji, Nauru, Samoa, Tonga and Vanuatu.
- Has approximately 1,400 active suppliers located in more than 47 countries.
- Main categories of spend are network equipment, customers' devices, bandwidth, field operations, electricity and fuel and logistics services.

Digicel Pacific's modern slavery risks

This year we completed a modern slavery risk assessment for Digicel Pacific.

The risk assessment used four key modern slavery risk factors: country/region, categories/sectors, business models and vulnerable populations to assess where, in relation to Digicel Pacific's business units and procurement categories, there is potential risk of modern slavery practices.

Risk areas for Digicel Pacific in its operations are:

PNG

- Casual employment of child actors for voice over media content
- Commission based Feet on the Streets (FOTs). These FOTs are engaged to promote mobile financial services and assist with customer queries (e.g. SIM registration, activate mobile wallets)
- Workers employed by Digicel Pacific distributors and their partners and distribution channels (such as wholesalers and resellers)
- Office maintenance and gym trainer contractors
- Interns
- Workers at Digicel branded retail stores not operated by Digicel Pacific
- Security and IT contingent workforce

Hubs (Fiji, Nauru, Samoa, Tonga & Vanuatu)

- Workers employed by Digicel Pacific distributors, wholesale point of sales and resellers
- Interns
- IT contingent workforce

Risk areas for Digicel Pacific in its supply chain are:

- Handsets and SIM cards
- IT workstations and accessories
- Field Services
- Construction and maintenance of network infrastructure
- Facilities and warehousing
- Media hardware
- Construction related to the Digicel Foundation
- Security
- Logistics
- Construction and maintenance of retail stores/kiosks.

How Digicel Pacific addresses modern slavery risks

- **Internal policies:** Digicel Pacific has adopted Telstra Group Policies, including the Code, Human Rights Policy, Whistleblowing Policy, Dealing with Suppliers and Other Third Parties Policy as well as Telstra's Supplier Code of Conduct.
- **Vendor onboarding:** Digicel Pacific collects Statements of Compliance with the Supplier Code of Conduct from its vendors at the engagement stage as part of its vendor onboarding process. In FY24, Digicel Pacific mapped its current practices and systems against the Supplier Governance Framework. In FY25, Digicel Pacific will develop a multi-year roadmap to adopt relevant components of the Supplier Governance Framework.
- **Updates to employment agreements:** Digicel Pacific at times engages child actors in accordance with law on a casual basis to provide voice overs for its media content. Digicel Pacific has updated its employment agreement to bring it into line with Australian standards relating to child actors.
- **Training:** All Digicel Pacific employees complete Telstra's Business Essentials Training as part of their onboarding. All employees will be required to undertake an annual refresher on a yearly basis. This year Digicel Pacific rolled out Telstra's Addressing Modern Slavery Training to all its PNG employees (with a completion rate of 100 per cent) and to select targeted groups in its hub markets (with a completion rate of 100 per cent).
- **Payment process for commission based FOTs:** If someone is performing FOTs work for Digicel Pacific on a commission-only basis, they receive a top up in any instances where the commission-only payments would result in them receiving less than the minimum wage applicable for the time that they spend performing the FOTs work.
- **Grievance Mechanism:** the Telstra Group Whistleblowing Service is available and is used in relation to complaints relating to Digicel Pacific.

How Digicel Pacific checks the effectiveness of its actions

- Monitoring completion rates for training.
- Working with Telstra to track the number of complaints received via whistleblowing mechanisms.

How Digicel Pacific consults within its group

Digicel Pacific's owned or controlled entities were included in the consultation processes carried out by the broader Telstra Group.

Digicel Pacific’s progress

● Achieved ● In progress ● Not achieved

FY24 commitment	Progress
Undertake a modern slavery risk assessment focused on its operations and supply chain.	● See ‘Digicel Pacific’s modern slavery risks’ section above.
Adopt the Telstra Group Policies where appropriate, taking into account local laws, and the laws in the markets in which Digicel Pacific operates.	● All Telstra Group Policies relevant to managing modern slavery risk have been adopted. See ‘How Digicel Pacific addresses modern slavery risks’ above for details of Group Policies adopted.
Review Telstra’s Supplier Governance Framework and adopt relevant components.	● See ‘How Digicel Pacific addresses modern slavery risks’ above for details of work done to review and adopt Telstra’s Supplier Governance Framework.
Roll out Telstra’s Addressing Modern Slavery Training for its employees.	● See ‘How Digicel Pacific addresses modern slavery risks’ above for details of training rolled out.
Update Digicel Pacific’s employment agreement for child actors.	● See ‘How Digicel Pacific addresses modern slavery risks’ above for details of Digicel Pacific’s employment agreement for child actors.

Digicel Pacific’s FY25 commitments

In FY25, Digicel Pacific will:
Develop a multi-year roadmap to adopt relevant components of the Supplier Governance Framework to manage supplier risk
Conduct modern slavery training for all Digicel Foundation panel contractors
Update all contracts with Digicel Pacific distributors and retailers to include clear expectations in relation to worker treatment by them and their partners and distribution channels and Digicel Pacific rights to monitor compliance
Develop clear guidelines for internships to support fair arrangements

Case study: Protecting workers in the security services sector

Recently, we investigated whether a supplier of security services to Digicel Pacific had complied with the requirements of Telstra’s Supplier Code of Conduct, including in relation to labour practices. The investigation identified there were areas of concern and further investigation was required to make sure the supplier was managing its workforce in a way that met our standards. Areas of concern related to pay rates and late payment, unpaid work, personal funding of work expenses and deductions for benefits never received by workers. Additional areas of concern related to inadequate training and resourcing of security guards.

Digicel Pacific is working with the supplier to remedy any breaches of the Telstra Supplier Code of Conduct and will review its processes to address any learnings to improve how it identifies, assesses and mitigates risks posed by its suppliers’ activities.





Who Versent is

- Provides cloud modernisation, digital experience, data and analytics and security and identity services with ongoing build and run offerings.
- Has a direct workforce of 484 people in Australia, Singapore, United Kingdom, Philippines and USA.
- Has 192 suppliers located in Australia, Singapore, United Kingdom, Philippines and USA.
- Its main categories of spend are human capital, technology services, software and hardware, facilities services (e.g. cleaning, office maintenance), marketing and professional services.

Versent's modern slavery risks

- Telstra acquired the Versent Group in FY24.
- In FY22, Versent assessed its modern slavery risk as low based on a high-level desktop review of its suppliers. The review considered Versent's spend with each supplier and whether the supplier had published a modern slavery policy or a modern slavery statement.
- Post-acquisition, Telstra has begun a review of Versent's policies and processes and will assist Versent with conducting a more detailed risk assessment in FY25, to identify its key modern slavery risk areas.

How Versent addresses modern slavery risks

- **Internal policies:** Versent adopted Telstra's Human Rights Policy, Whistleblowing Policy and the Code in FY24. It is currently reviewing the Versent Group's operations to check compliance with these policies. Versent also has policies relating to conduct, procurement and grievances in place to support its modern slavery risk mitigation measures, including a Grievance Policy.
- **Employee management:** Versent has a framework in place to check it complies with labour laws applicable to its direct employees, including by monitoring hours worked through a timesheet system in line with applicable law and annual review of employment contracts to confirm legal compliance. Versent regularly assesses its compliance with local employment laws in the jurisdictions it operates, including by engaging external advisors to assess compliance with law outside Australia.
- **Contracts:** Versent rolled out new standard supply and partner contracts with specific clauses requiring compliance with modern slavery legislation. These contracts are used for all new suppliers and partners, and existing suppliers and partners roll over to the new standard contracts when their contracts are renewed.

How Versent checks the effectiveness of its actions

Versent has prioritised putting in place risk mitigation measures to date and will identify and implement appropriate processes to measure their effectiveness in FY25.

How Versent consults within its group

Versent's owned or controlled entities were included in the consultation processes carried out by the broader Telstra Group.

Versent's progress

● Achieved ● In progress ● Not achieved

Prior year commitments	Progress
Further assess and review Versent's existing supplier and partner network's compliance with the law and their reputation and issue a supplier/partner questionnaire.	● Versent was not able to progress this in FY24. In FY25, it will issue a supplier/partner questionnaire to enable Versent to perform targeted modern slavery diligence on its supplier and partner network going forward.
Front-end Versent's awareness of partner and supplier compliance, amend our current third-party risk assessment to include questions aimed at uncovering potential modern slavery and human trafficking issues and eliciting minimum commitments with respect to ongoing compliance.	● Versent discontinued this workstream due to its sale process to Telstra. Instead, Versent will start the process of aligning its supplier governance framework with that of the Telstra Group to the extent appropriate in FY25. It will also implement a supplier/partner questionnaire covering modern slavery.
Ensure Versent's policies and recruitment processes are appropriate to protect against modern slavery and human trafficking, conduct a review and prepare a first draft of a new modern slavery policy which will (when finalised) be dispersed to Versent personnel.	● Versent adopted Telstra's Human Rights Policy, Whistleblowing Policy and Code of Conduct in FY24. See 'How Versent addresses modern slavery risks' above for more details. In FY25, it will review its recruitment processes and start the process of aligning its supplier governance framework with that of the Telstra Group to the extent appropriate.
Enhance and communicate Versent's position against modern slavery, include specific clauses regarding compliance with modern slavery legislation for all new partner and supplier contracts.	● Versent rolled out new standard supply and partner contracts with specific clauses requiring compliance with modern slavery legislation. See 'How Versent addresses modern slavery risks' above for more details.

Versent's FY25 commitments

In FY25, Versent will:
Undertake a more detailed risk assessment of the Versent Group to identify its specific modern slavery risks, including for its indirect workforce in the Philippines
Start the process of aligning Versent's supplier processes with Telstra's Supplier Governance Framework to the extent appropriate
Review its recruitment processes to confirm they are appropriate to protect against modern slavery
Roll out Telstra's Business Essentials Training to all staff and track completion rates
Implement a targeted supplier/partner questionnaire covering modern slavery risks
Identify and implement appropriate processes to measure the effectiveness of Versent's modern slavery risk mitigation measures

The content in relation to Versent (page 31) was approved by the CEO and Board of Versent.

Our progress

We continue to monitor our progress on the Telstra Group FY24 commitments and have identified additional focus areas for FY25.

Telstra Group FY24 Commitments

● Achieved ● In progress ● Not achieved

Commitment	Progress
Formally review the Supplier Governance Framework to identify and address any gaps/learnings from the implementation of the Framework in FY23.	<ul style="list-style-type: none"> ● Using learnings from our FY23 implementation, the Supplier Governance Framework was updated in FY24. See the 'Supplier Governance Framework' section on page 15 for further detail.
Improve our supplier onboarding processes to ensure consistent review and assessment of supplier responses to KYS questions, including in relation to labour practices.	<ul style="list-style-type: none"> ● We implemented a compliance check process in our KYS platform to improve how we review and assess our supplier responses in relation to labour practices. See the 'Know Your Supplier Platform' section on page 16 for further detail.
Develop guidance documentation and accompanying training for contract owners undertaking supplier risk assessments (which encompass labour practices), to ensure more effective supplier risk assessments.	<ul style="list-style-type: none"> ● We held training sessions in FY24, for our contract owners, on how to undertake more effective risk assessments and developed accompanying guidance and resources. See the 'Supplier Governance Framework' section on page 15 for further detail.
Incorporate the use of third-party supplier modern slavery risk profiling into our due diligence processes.	<ul style="list-style-type: none"> ● We have implemented a third-party modern slavery risk profile rating in our KYS platform. See the 'Know Your Supplier Platform' section on page 16 for further detail
Update our salient human rights issues assessment.	<ul style="list-style-type: none"> ● In FY24, Telstra updated its salient human rights assessment with the help of an external human rights consultancy. Human rights risks were identified and assessed for severity and indicative likelihood. Labour rights in the supply chain continues to be one of Telstra's salient human rights issues. See the 'Human rights' section in our 2024 Bigger Picture Sustainability Report available on our reports page for detail on our updated salient human rights issues and our response to these.
Develop guidance for our M&A team on human rights issues, including modern slavery risk, to consider in the M&A process.	<ul style="list-style-type: none"> ● See the 'New acquisitions' section on page 25 for detail on the human rights guidance for M&A developed this year.
Develop guidance on how to engage with suppliers on human rights issues, including labour rights during supplier management meetings.	<ul style="list-style-type: none"> ● See the 'Constructive engagement with suppliers' section on page 14 for detail on the guidance we developed this year on engaging with suppliers on human rights issues.
Review and update Telstra's metrics to assess the effectiveness of our human rights risk management efforts.	<ul style="list-style-type: none"> ● In FY24, we worked with an external human rights consultancy to review and update the metrics Telstra uses to assess the effectiveness of our actions to manage our salient human rights risks. See the 'Human rights' section in our 2024 Bigger Picture Sustainability Report available on our reports page for an updated list of public metrics. The review included additional metrics for internal monitoring and others for future consideration. These will inform the development of our human rights work.

Telstra Group FY25 Commitments

Review and update our information sources for our ongoing monitoring program, including those related to labour rights
Implement improved governance for tracking risk mitigation actions identified through our KYS platform and ongoing monitoring
Revise our supplier inherent and residual risk scoring to incorporate updated methodologies
Uplift our Supplier Governance Framework Training to better support contract owners in assessing and managing risks
Develop human rights questions for use in tender processes
Develop supplier guidance to assist suppliers to understand and implement the labour and human rights expectations set out in the Supplier Code of Conduct
Develop supplier guidance on effective grievance mechanisms
Develop an investigations and remediation protocol for human rights issues in the supply chain.

Appendix 1: Reporting Entities

Reporting Entity	Description
Australian Act reporting entities	
Amplitel	Main business involves providing telecommunication infrastructure assets for its customers to deliver telecommunications services (fixed and wireless) across Australia. This includes building, upgrading, operating, inspecting and maintaining telecommunication infrastructure and providing access for the customers to collocate their equipment on Amplitel's infrastructure
Amplitel HoldCo	The holding company of Telstra's investment in Amplitel
TGL	The ultimate parent company of the Telstra Group whose shares are publicly traded on the ASX
Telstra Limited	Owns and operates Telstra's business including Telstra's retail, wholesale, Health, Energy and Purple businesses, but excluding the businesses of Telstra InfraCo, Telstra International and Amplitel. Telstra Limited also owns and operates the active parts of the Telstra Group's infrastructure network
Telstra InfraCo	Owns and operates the passive infrastructure asset business
Telstra International	Owns and operates Telstra's business of providing international services using the international assets, which includes the Digicel Pacific group
Telstra Purple	Provides technology services focused on outcome-based, transformative tech solutions
Telstra Health	Main operating entity in the Telstra Health Group. Primary operations are the development and provision of software solutions to governments, hospitals and health and aged care providers as well as operation of the National Cancer Screening Register and 1800RESPECT services for the Commonwealth Government
Telstra Pay TV	Holds the broadcasting licence which enables Telstra to sell pay TV services
Telstra Holdings	Holding company of many of Telstra International's subsidiary companies
Telstra PM Holdings and Telstra PM	Interposed holding entities for the Digicel Pacific corporate group. Digicel Pacific is a provider of mobile phone, ICT services (including TV, home and business internet solutions) and operates telecommunications infrastructure across six markets in the South Pacific region
Versent	Leading technology consultancy specialising in cloud modernisation, digital experience, data and analytics and security and identity services with ongoing build and run offerings
UK Act reporting entities	
Telstra UK	Provider of telecommunication services in UK and Europe, Middle East and Africa
Canadian Act reporting entities	
Telstra Incorporated	Main operating entity in the Americas, selling international connectivity services to large multinational enterprises and carriers located in the Americas by using the international assets

Appendix 2: Acts criteria

The table below identifies where in this statement we have addressed each mandatory criteria under the Australian Act and Canadian Act and each recommended criteria under the UK Act.

Australian Act – mandatory criteria	UK Act – recommended criteria	Canadian Act – mandatory criteria	Reference in this statement
Identify the reporting entity		Entity's identifying information: <ul style="list-style-type: none"> reporting entity's legal name financial reporting year identification of reporting obligations in other jurisdictions entity categorisation according to the Canadian Act sector/industry location 	Pages 1, 33, 37
Describe the structure, operations and supply chain of the reporting entity	Organisation's structure, its business and its supply chains	Entity's structure, activities and supply chains	Pages 4-6, 27-31, 33, 37
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	The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place	Parts of the entity's business and supply chains that carry a risk of forced labour or child labour	Pages 10, 27-31
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	<ul style="list-style-type: none"> Policies in relation to slavery and human trafficking, due diligence processes in relation to slavery and human trafficking in its business and supply chains Steps taken to assess and manage the risk of slavery and human trafficking Training about slavery and human trafficking available to its staff 	<ul style="list-style-type: none"> Policies and due diligence processes in relation to forced labour and child labour Steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity Steps the entity has taken to assess and manage the risk of forced labour or child labour being used in the specific parts of its business and supply chains that carry such a risk Any measures taken to remediate any forced labour or child labour Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in the entity's activities and supply chains The training provided to employees on forced labour and child labour 	Pages 7-9, 10, 11-23, 25-31
Describe how the reporting entity assesses the effectiveness of such actions	The organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Pages 24, 27-31
Describe the process of consultation with any entities that the reporting entity owns or controls			Pages 25-31
Any other information that the reporting entity considers relevant			Pages 2, 3, 27-31, 32
Details of approval and signature	Details of approval and signature	Details of approval, attestation and signature	Pages 3, 27-31

Appendix 3: Glossary

Term	Meaning
Addressing Modern Slavery Training	Telstra's training on modern slavery risk in Telstra's value chain and how to take action to address it. More details are set out in the 'Our training' section on page 22
Australian Act	<i>Modern Slavery Act 2018 (Cth)</i>
Amplitel	Towers Business Operating Trust ABN 75 357 171 746. Its trustee is Amplitel Pty Ltd ABN 15 648 133 073
Amplitel HoldCo	TowerCo No. 2 Pty Ltd ABN 53 648 133 297
Business Essentials Training	Mandatory annual training which covers the Code of Conduct and includes a human rights module which covers modern slavery risk mitigation. More details are set out in the 'Our training' section on page 22
Canadian Act	<i>Fighting Against Forced Labour and Child Labour in Supply Chains Act (CA)</i>
Code	Telstra's Code of Conduct . More details are set out in the 'Our policies' section on page 8
Digicel Pacific	Telstra PM, Telstra PM Holdings and their owned or controlled entities
Direct workforce	People working at the direction of Telstra Group even if they are provided by a vendor (i.e. where an agency provides contractors)
EDD	Enhanced due diligence
Fetch TV	Media Innovations Holdings Pty Ltd and its subsidiaries
FY23	Financial year ending 30 June 2023
FY24	Financial year ending 30 June 2024
FY25	Financial year ending 30 June 2025
Group Policies	Telstra's Group Policies are those policies with widespread application and significant impact to the Telstra Group and are overseen by the Telstra Group Policy Governance Framework. These include the Code, Human Rights Policy and Whistleblowing Policy.
Group Policy Governance Framework	The Telstra Group Policy Governance Framework: <ol style="list-style-type: none"> 1. provides a framework for the development, establishment, amendment and review of Telstra Group Policy documents; and 2. defines the roles and responsibilities in relation to the development, establishment, amendment and review of Group Policy documents. Specifically: <ol style="list-style-type: none"> c. the Code which defines the principles and standards of behaviour that we expect, addressing topics that have significant impact, and d. Group Policies which define principles to articulate required standards of behaviours and guide decision making.
Group Governance Operating Model	Telstra's Group Governance and Operating Model is a framework that outlines the governance and operation requirements of entities in the Telstra Group. It contains the governance principles and standards which Telstra Group entities are required to comply with. It also outlines who will make key decisions and who will execute on a range of shared services and functions, whether that be Telstra Limited, the entity or a mix.
GSMA	Global System for Mobile Communications Association
ICT	Information and communications technology
Indirect workforce	Includes labour under the direction of outsourced partners who have access to Telstra systems in order to deliver services (e.g. consultants)
JAC	Joint Alliance for Corporate Social Responsibility
KYS	Know Your Supplier
M&A	Mergers and acquisitions
Main Employing Entities	TGL, Telstra Limited, Amplitel, Telstra InfraCo and Telstra International, which together employ the majority of employees in the Telstra Group
MedicalDirector	Clinical Technology Holdings Pty Limited and its subsidiaries, part of the Telstra Health group
modern slavery	'modern slavery' as defined in the Australian Act, 'slavery and human trafficking' as defined in section 54 of the UK Act, 'forced labour' and 'child labour' as defined in section 2 of the Canadian Act

Term	Meaning
PNG	Papua New Guinea
PowerHealth	Power Solutions Holdings Pty Ltd and its subsidiaries, part of the Telstra Health group
Procurement Principles Training	Telstra's training to help our procurement specialists understand their responsibilities. More details are set out in the 'Our training' section on page 22
RBA	Responsible Business Alliance
Reporting Entities	The reporting entities in the Telstra Group under the Australian Act, Canadian Act and UK Act, set out in Appendix 1
Risk rating	Labour rights country risk ratings are calculated based on countries' scores in the Walk Free Global Slavery Index's analysis of countries' vulnerability to modern slavery. Total vulnerability score of 46 and above is high, 45–16 is medium, 15 or below is low. Where this information is not available for a particular country, labour and country risk ratings are calculated based on countries' scores in the World Bank Governance Indicators, Freedom House Global Freedom Score and Corruption Perceptions Index, which draw on a range of human rights (including modern slavery) and governance related data.
Supplier Code of Conduct	A Telstra policy setting out the minimum standards we expect from our suppliers. More details are set out in the 'Our policies' section on page 8
Supplier Governance Framework	Telstra's Supplier Governance Framework setting out the minimum requirements team members must meet to effectively manage our suppliers and their suppliers. More details are set out in the 'Supplier Governance Framework' section on page 15
Supplier Governance Framework Training	Telstra's training on our Supplier Governance Framework and supplier risk. More details are set out in the 'Our training' section on page 22
Supplier Risk Categories	12 risk categories Telstra uses to assess supplier risk. More details are set out in the 'Supplier Governance Framework' section on page 15
Telstra, the Telstra Group, we, our, us	TGL and its owned or controlled entities, including the Reporting Entities, unless otherwise specified
Telstra Corporation or Telstra InfraCo	Telstra Corporation Limited ABN 33 051 775 556
Telstra Health	Telstra Health Pty Ltd ABN 38 163 077 236
Telstra Health Group	Telstra Health Pty Ltd and its subsidiaries
Telstra Holdings	Telstra Holdings Pty Ltd ABN 45 057 808 938
Telstra Limited	Telstra Limited ABN 64 086 174 781
Telstra International	Telstra International Holdings Pty Ltd ABN 95 648 133 475
Telstra Pay TV	Telstra Pay TV Pty Ltd ABN 65 095 931 614
Telstra Purple	Telstra Purple Pty Ltd ABN 13 097 323 781
Telstra PM	Telstra PM Pty Ltd ABN 21 653 836 321
Telstra PM Holdings	Telstra PM Holdings Pty Ltd ABN 71 648 132 941
Telstra Super	Telstra Super Pty Ltd
Telstra UK	Telstra UK Limited
TGL	Telstra Group Limited ABN 56 650 620 303
TTF	Telco Together Foundation
UK Act	<i>Modern Slavery Act 2015 (UK)</i>
UNGCNA	UN Global Compact Network Australia
UNGPs	United Nations Guiding Principles on Business and Human Rights

Term	Meaning
UNGPs continuum of involvement	<p>Explains how a business may be involved in potential or actual human rights impacts such as modern slavery:</p> <ul style="list-style-type: none"> Businesses may cause an adverse human rights impact like modern slavery if their actions directly result in modern slavery (e.g. if a business exploits its employees, including confiscating their passports to prevent them from leaving or reporting the exploitation) Businesses may contribute to an adverse human rights impact like modern slavery where the impact would have been unlikely to occur without their actions or omissions, including if their actions or omissions incentivise or facilitate modern slavery (e.g. if a business pressures a supplier to significantly reduce costs and lead times to such an extent, it is aware it can likely only be achieved by using forced labour) Businesses may also be directly linked to an adverse human rights impact such as modern slavery where their operations, products or services are connected to modern slavery through their business relationships, including entities in their value chain (e.g. if a business purchases goods from a supplier which include raw materials extracted by sub-suppliers using forced labour).
Versent	Versent Pty Ltd ABN 600 701 764
Versent Group	Versent, Versent Group ESS Pty Ltd, Versent US Inc, Versent SG Pte Ltd and Stax-WMS Pty Ltd
Whistleblowing Policy	A Telstra policy setting out protections for reporting concerns. More details are set out in the 'Our policies' section on page 8
Whistleblowing Service	Telstra's confidential, independent, whistleblowing service, which is described in the 'Grievance mechanisms and remediation' section on page 23
the year, this year, reporting year	FY24 (1 July 2023 – 30 June 2024)

Appendix 4: Additional information for the purposes of Canadian reporting requirements

Entity categorisation according to the Canadian Act:

- Telstra Incorporated meets the definition of entity under section 2 of the Canadian Act and meets the criteria for being a reporting entity, as per section 9(b) of the Canadian Act.
- Under section 2 of the Canadian Act, Telstra Incorporated is an entity because it: (a) had a WeWork office at 1100 King Street, Toronto, ON, Canada until 30 June 2024, and therefore had a place of business in Canada in FY24; (b) sells various telecommunications services in Canada, including, by way of example, private line and internet connectivity services as part of broader global connectivity services sold primarily to non-Canadian multinational enterprise customers, and therefore does business in Canada; (c) has a point of presence located at 151 Front Street, Toronto, ON, Canada, and therefore has assets in Canada; and (d) based on its financial statements for the two most recent financial years, had more than \$20 million in assets and generated more than \$40 million in revenue, and therefore exceeded the asset and revenue thresholds set forth in the Canadian Act.
- Under section 9(b) of the Canadian Act, Telstra Incorporated is subject to the annual reporting obligation for entities because, to support its business activities in Canada, Telstra imports into Canada goods that are produced outside of Canada.

