macquarie
TELECOM GROUP

Modern Slavery Policy

Group Policy

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Contact Details

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This policy is valid until revised by the board.

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1. An introduction to this Modern Slavery Policy (the Policy)

1.1 Aim

On 1 January 2019 the Modern Slavery Act 2018 (Cth) (**the Act**) commenced, introducing a new statutory reporting regime for larger companies operating in Australia.

This Policy is designed to provide Macquarie Telecom Group with a framework for complying with its obligations under the Act and provide guidance on how to identify and manage risks of modern slavery appearing in our operations or supply chains.

1.2 Underlying Principles

Macquarie Telecom Group is committed to high standards of conduct and ethical behaviour in its business activities and rejects all forms of modern slavery.

Although the Macquarie Telecom Group is an Australian company with a strong focus on keeping our operations onshore, the key focus of this Policy is to identify potential risks of modern slavery in our operations and supply chains and take steps to minimise, prevent, mitigate and remedy them, by focusing on high-risk areas. This includes vendors who manufacture IT equipment and hardware in developing countries.   Recent research by the United Nations identified that of the more than 40 million victims of Modern Slavery world-wide, over half are exploited in the Asia-Pacific region, in which the supply chains of a significant number of large businesses operating in Australia are based.

High risks areas can be identified by sector, industry, geographic location or the following indicators:

- living at the workplace, or another place owned/controlled by their employer
- underpaid or not paid at all
- required to work excessive hours
- confined or isolated in the workplace or only able to leave at odd times
- guarded at work or in their accommodation
- isolated in remote locations that are difficult to access
- restricted from contacting people outside the workplace
- managed by an intermediary or third party who 'holds' or 'invests' their money for them
- subject to different or less favourable working conditions than other workers
- unable to terminate their employment
- appear to be servicing a debt to an employer or a third party (such as a recruitment agent)

- appear to be subjected to, or threatened with, violence, abuse or intimidation
- appear to have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party
- appear to have been deceived about the conditions of their employment
- are not provided with contracts in a language and format that they can easily understand
- are not informed of, or do not appear able to understand their employment conditions
- are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices

2. Key terms

2.1   Who is covered by the Policy?

The Policy applies to all persons working for or on behalf of Macquarie Telecom Group, including employees, directors, officers, agency workers, interns, contractors, consultants, third party representatives and business partners.

2.2   What is modern slavery?

Modern slavery describes situations where victims are being deprived of their freedom through threats, coercion or deception.

Modern slavery includes the following types of exploitation:

- people trafficking;
- slavery, servitude;
- forced marriage;
- forced labour;
- debt bondage;
- child labour; and
- deceptive recruiting for labour or services.

2.3   Policy statement

We will implement systems and controls to meet our obligations under the Act, to support the policy behind identifying and remedying modern slavery within our operations and supply chains.

2.4   Self-Assessment Questionnaire

To support our policy statement and monitor what steps our suppliers are taking to identify and manage risks of modern slavery we require all of our high-risk suppliers to answer a self-assessment questionnaire (the **Questionnaire**). The form of questionnaire is set out in Appendix A.

The Questionnaire is designed to help our suppliers identify risks of modern slavery in their organisations, collaborate with us to address these risks, improve transparency and identify areas that need further investigation.

3. Internal Stakeholder Responsibilities

3.1 Recruitment

All Macquarie Telecom Group staff members involved in hiring activities must:

1. adhere to the contents of this Policy; and

2. ensure that new starters understand the objectives of this Policy via induction training or by completing the Modern Slavery training module on the Company's Learning Management System.

3.2 Suppliers

Working with our suppliers to identify and understand the risks of modern slavery, is a key step towards addressing worldwide modern slavery and related practices.

3.2.1 Questionnaire

Each Macquarie Telecom Group staff member who enters into a new contract with a new supplier or who is responsible for any contract with an existing supplier that is high risk must:

- provide the key contact at that supplier with a link to this Policy;

- ask that person complete and return the Questionnaire; and

- advise the key person they the supplier must keep evidence showing the steps it has taken to comply with the Code and let us see that evidence if we request it.

If any risks are found from a returned questionnaire, then that staff member should contact the General Counsel, another member of legal team to seek further guidance. That person will then work with the staff member to identify what further action is required from the supplier to address the risks.

3.2.2 Supply contracts

All supply contracts that we enter into after the date of the Policy will contain an express prohibition on the supplier engaging in any modern slavery behaviour or practices. If the supplier fails to comply with this obligation, we may to terminate the contract.

4. Compliance and reporting

We are committed to promoting a culture of honesty, compliance and good corporate governance that upholds our values.

Everyone employed or engaged by the Macquarie Telecom Group must read, understand and comply with this Policy. We each play a part in preventing, detecting and reporting modern slavey within our operations or supply chain.

If anyone becomes aware of or suspects that any modern slavery behaviours or practices are taking place within our operations or supply chains, they must immediately report this to the General Counsel, any other member of the legal team or to their relevant Executive.

Any breach of the Policy is a "Disclosable Matter" under our Whistle-blower Policy so a report can also be made to our Whistleblower Protection Officer (the Senior Manager, People & Culture) or by email to whistle@macquarietelecomgroup.com.

Appendix A
Self-Assessment Questionnaire

Background

On 1 January 2019 the Modern Slavery Act 2018 (Cth) (**the Act**) commenced, introducing a new statutory reporting regime for larger companies operating in Australia. In order to meet our obligations under the Act, Macquarie Telecom Group requires selected suppliers to complete the following questionnaire.

PART A – YOUR DETAILS	
Organisation name	
Organisation number (ACN/ABN / foreign equivalent)	
Organisation address (headquarters)	
Contracting entity details and locations	
Contracting entity name	
Description of goods, materials and/or services provided	
Address of facility, site of operation location	
Details of representative to contact for further information	
Name	
Position	
Email	
Phone number	

PART B: SELF ASSESSMENT REQUIREMENTS

☒ I confirm my organisation complies with the Macquarie Telecom Supplier Self-Assessment Requirements (set out below); or

☐ Our organisation does not currently comply, or only partially complies, with the Macquarie Telecom Supplier Self Assessment Requirements.

Please set out reasons for non compliance or partial compliance below:

General modern slavery response

- Your organisation is aware of and complies with its obligations under the Modern Slavery Act 2018 (Cth)

- Key staff understand risks around modern slavery and compliance requirements

Supply chain management

- Your organisation conducts appropriate due diligence on your suppliers

- Your organisation takes appropriate action if modern slavery practices are suspected

PART C – DECLARATION BY SUBMITTING PERSON

Note: This Questionnaire is required to be signed by a duly authorised representative of the organisation. This should be a senior level employee e.g. a director, general manager or executive. If you are aware of any changes to the answers provided in this Questionnaire after the date of signing, please promptly notify your Macquarie Telecom representative.

I declare that:	……………………………………………
	Signature of authorised person
I am duly authorised to make representations on behalf of the organisation.	……………………………………………
	Name of authorised person
The information provided here is true, complete and correct	……………………………………………
	Position of authorised person

Thank you for completing this questionnaire. For any queries, please contact your Macquarie Telecom representative.