

# Modern Slavery Statement

June 2024

# 1 Reporting Entity

## Uniti Group

This modern slavery statement has been prepared by Uniti Group Limited ABN 73 158 957 889 on behalf of itself and each of its subsidiaries for the reporting period 1 January 2023 to 31 December 2023.

The full list of entities in the Uniti Group of companies is set out in Schedule 1.

All the entities specified above carry on business in Australia and are companies registered under the Corporations Act. The registered office of Uniti is Level 1, 44 Currie Street, Adelaide SA.

In July 2022, Uniti was acquired by a consortium comprising Morrison & Co, Commonwealth Superannuation Corporation and BIF IV One Holdings (a Brookfield entity) and was delisted from the Australian Stock Exchange.

Since acquisition by the consortium, Uniti changed its financial year so that it begins on 1 January and ends on 31 December, commencing 1 January 2023.

## 2 Operations and Supply Chains

Uniti is a diversified provider of telecommunications services with offices in Melbourne, Sydney, Adelaide, Brisbane and Perth. It continues to operate three distinct Business Units being: Wholesale, Retail and Enterprise.

The Wholesale business unit continues to be engaged in the design, installation, operation and maintenance of fibre to the premises (FTTP) open access wholesale telecommunications 'last mile' network infrastructure, operating mainly in greenfields new housing developments, in broadacre residential estates and multiple dwelling units throughout Australia.

The Retail business unit now provides retail telecommunications products and services including broadband and voice services primarily on resold fibre access networks operated by the Uniti Group's Wholesale business. The fixed wireless infrastructure that had been operated by the Retail business unit is the subject of a sale agreement with CM Value Added Services Pty Ltd dated 21 December 2023 which sale is anticipated to complete by the end of June 2024.







The Enterprise business unit continues to provide intelligent voice and communications solutions over 13, 1300, 1800 calling services as well as value-added software-as-a-service data analytics and call tracking application. It also leases phonewords on these numbers.

In addition, the shared services department supports all business units, encompassing the following functions: Finance, Human Resources, Legal & Company Secretariat, Regulatory, Risk & Compliance and Group IT.

At present, the workforce consists of 207 workers, primarily permanent full time and part time employees with a small number of independent contractors.

## Supply Chain

Uniti's supply chain has not changed substantially from the last Modern Slavery Statement. The main categories of suppliers can be broken down as set out below:

	Category	Description	Business Unit
	Telecommunications and network equipment	Supply of equipment by Australian-based suppliers who source equipment from global vendors and manufacturers.  The vendors/manufacturers utilise offshore facilities for the manufacturing of equipment predominantly in Asia and some in Europe	Wholesale Retail
	Telecommunications services	Suppliers of IP transit, backhaul, network and other telecommunications services	Wholesale Retail
	Independent contractors	External contractors providing construction services, supply of network infrastructure design and construct services by Australian suppliers.  Installation of telecommunications equipment.	Primarily Wholesale
	Facilities	Leases and freehold -office and warehouse space	Whole of business
	IT equipment, software and other related services	Vendors and resellers of software and hardware	Whole of business
	Other	Supply of services including financial, legal, marketing and training  Sales and business support	Whole of business  Retail and Enterprise

### 3 Risk of modern slavery practices in operation and supply chains

#### Risks in Uniti Operations

The risk of modern slavery in our own operations remains low. The majority of our direct workforce is covered by employment agreements which confer pay and entitlements which are compliant with labour laws.

We have a small indirect workforce based in the Philippines that includes customer service agents and some contractors supplying software development services based in ex-Soviet countries. The contractors' rates are reviewed by our HR team and are all above minimum pay rates for their respective countries of residence.

#### Risk in Supply Chains

The areas which present the highest risk of modern slavery remain suppliers of network and IT equipment that are manufactured offshore, and in network construction. The risks within our supply chains in this reporting year remains unchanged.

#### Network and IT equipment manufactured offshore

As in previous years, the largest category of supplier expenditure for Uniti remains in construction and maintenance of the built network, with other categories of significant expenditure including but not limited to network equipment, IT services, software and hardware.

The business obtains its hardware and equipment primarily from suppliers based in Australia who source the hardware and equipment from global vendors whose manufacturing facilities are

overseas in low-cost labour locations. Manufacture and supply of components is primarily concentrated in high-risk geographical areas such as Asia, with deep and often complex supply chains. Although almost exclusively dealing with global suppliers who have similar obligations and concerns around modern slavery, Uniti acknowledges that this remains its most potentially at-risk category.

### **Network construction**

Uniti's operational model remains unchanged in that it employs a large number of contractors to support construction of pit and pipe as well as field services tasks.

The risk of modern slavery in the construction industry is managed through our internal procurement processes and OH&S screening and financial checks. Contractors are also formally inducted and required to complete site-specific inductions when deployed for site work for and on behalf of the Uniti Group.

### **Customer support - higher risk geographies**

Uniti's customer support team continues to engage with a small indirect workforce based in the Philippines who are treated as an extension of the onshore team. There is no change in the supply contract from previous reporting years.

## **4 Actions taken to assess and address these risks**

### **Procurement Assessment of Risks in Supply Chains**

The new role of Procurement & Supply Chain Manager was created in January 2024. Since the appointment, the Procurement & Supply Chain Manager has commenced putting in place a more rigorous procurement process which involves a risk assessment for modern slavery and active management of our supply chain. It will enable the evaluation and management from both quality and financial perspectives. Regular reviews and updates will ensure that our supplier management processes remain aligned with Uniti's goals and objectives.

### **Employee Training**

Uniti utilises a Human Resources Information System (HRIS) which incorporates an online learning module. A training module on Modern Slavery now forms part of standard induction. Uniti remains a member of the Telco Together Foundation and continues to participate in Modern Slavery Roundtables with other telecommunications providers. Telco Together provide valuable resources to its members which assist in internal training.

### **Whistleblower Hotline**

In July 2023 Uniti implemented a whistleblower platform supplied by Whisplii. The whistleblower hotline is available to staff (including contractors) to enable reporting of Modern Slavery as well as other matters of concern.

### **Risk & Compliance Platform**

Uniti has implemented an online Risk & Compliance platform which offers an integrated approach to identifying, profiling and assessing risks and developing and implementing mitigating actions. The compliance management component of the platform has been configured to

include Modern Slavery obligations. Compliance reports may be reviewed by the Board on a quarterly basis to identify potential issues.

## Governance

The highest level of responsibility for modern slavery sits with the Uniti Board of Directors which has oversight of strategy, business performance, compliance and risk management, including in relation to Modern Slavery.

At an operational level, our progress on modern slavery has been driven by a team which includes personnel from Legal, Risk & Compliance, OHS, and People & Culture.

## 5 Effectiveness of actions taken to assess and address modern slavery risks

Our Procurement & Supply Chain Manager has started developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address the modern slavery risks in our operations and supply chains. We anticipate that the frameworks and processes will be in place by the beginning of 2025 at which time we will be in a position to assess their effectiveness.

## 6 Consultation with controlled entities

Uniti Group operates as an integrated group of companies with the same policies and systems that apply to all subsidiaries. During the reporting period this statement covers, Uniti actively engaged and consulted with all subsidiaries in the development of this statement and discussed details of the reporting requirements. This Statement was circulated to the Executive and Senior Leadership teams for comment and endorsement before being presented to the Board for review and approval.

## 7 Approval

This Modern Slavery Statement was approved by the Board of Directors on 18 June 2024 and is signed on its behalf by the Managing Director and Chief Executive Officer.



Managing Director and Chief Executive Officer  
**MICHAEL SIMMONS**

## Schedule 1 Uniti Group of Companies

Entity Name	ACN
Uniti Play Pty Ltd	165 954 067
Uniti Est Pty Ltd	165 954 272
Uniti Fixed Wireless Pty Ltd	632 472 934
Uniti Retail Pty Ltd	154 074 218
Fibreworks Internet Pty Ltd	616 520 702
Fone Dynamics Pty Ltd	166 195 946
FDX Holdings Pty Ltd	618 695 140
Call Dynamics Pty Ltd	160 887 936
Uniti Enterprise Pty Ltd	627 544 441
LBN Co Pty Ltd	073 226 114
Capital Fibre Networks Pty Ltd	619 334 002
Link Us Pty Ltd	604 463 710
Service Elements Pty Ltd	600 341 008
OPENetworks Pty Ltd	118 525 821
1300 Holdings Pty Ltd	622 320 281
1300 Australia Pty Ltd	108 792 016
Opticomm Pty Ltd	117 414 776
OptiComm Integration Pty Ltd	610 697 106
Harbour ISP Pty Ltd	154 752 968

