

NBN Co Limited
Modern Slavery Statement
For the year ended 30 June 2020



About this report



Reporting entity

This is the first modern slavery statement of NBN Co Limited ABN 86 136 533 741 and its controlled entities.

The relevant controlled entities of NBN Co Limited for the reporting period 1 July 2019 to 30 June 2020 are:

- NBN Tasmania Limited and
- NBN Co Spectrum Pty Ltd

These controlled entities were not operational during the reporting period and did not meet the reporting threshold set out by the *Modern Slavery Act 2018* (Commonwealth), ('the Act').

Throughout this statement, NBN Co Limited and its controlled entities are referred to as NBN Co or 'the Company'.

Preparing this statement and consultation

This statement has been prepared in accordance with the Act and covers the reporting period 1 July 2019 to 30 June 2020. It outlines the risks of modern slavery across NBN Co operations and supply chains, its response to these risks, and how the Company evaluates the effectiveness of its response. During the reporting period, NBN Co undertook consultation with NBN Tasmania Limited and NBN Co Spectrum Pty Ltd regarding the preparation of this modern slavery statement via a briefing to the Company Secretary. Both entities were provided an opportunity to participate in the preparation of this statement.

As NBN Tasmania Limited and NBN Co Spectrum Pty Ltd ceased operations during the reporting period, extensive consultation beyond what is described above was not required.

NBN Co commitment to tackling modern slavery in its operations and supply chains

The Act defines modern slavery as situations where coercion, threats or deception are used to exploit victims and undermine their freedom.

Examples include:

- trafficking of persons
- slavery
- servitude
- deceptive recruiting
- forced marriage
- forced labour
- debt bondage
- worst forms of child labour.

The Act's definition does not include other illegal and harmful practices which are also not tolerated by NBN Co such as substandard working conditions and underpayment.

Globally, there are approximately 40.3 million people¹ currently living in modern slavery across a range of industries and countries, including approximately 15,000 modern slaves in Australia². Anyone can be a victim of modern slavery. However, there are certain types of workers who are more vulnerable due to limited knowledge of labour rights and protections or due to barriers when fleeing modern slavery because of other forms of discrimination such as gender or cultural affiliation.

At NBN Co, the responsibility to mitigate the risk of modern slavery is taken seriously. NBN Co has in place processes to manage modern slavery risks and is committed to ongoing improvement to not only better identify and assess but to mitigate and remediate instances of modern slavery throughout NBN Co operations and supply chains.

Legal Statement

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NBN Co Limited is registered at Tower 5, Level 14, 727 Collins Street, Docklands VIC 3008.

ABN 49 138 338 271

ABN 30 094 085 024

¹ www.globallslaveryindex.org/2019/findings/foreword/

² www.globallslaveryindex.org/2018/data/maps/#prevalence

🔗 Contents

Introduction and
About NBN Co:
structure, operations
and supply chain **04**

Message from
the CEO **06**

Modern slavery risks **07**

Our Approach and
Assessment **09**

The future of
modern slavery
risk management
at NBN Co **12**



About NBN Co



NBN Co's purpose
is to lift the
digital capability
of Australia

➤ **By providing access to fast, reliable and affordable broadband through Retail Service Providers (RSPs), NBN Co is helping Australian homes and businesses realise the social and economic benefits that high-speed broadband can unlock.**

NBN Co's purpose and structure

nbn™ is wholly owned by the Commonwealth of Australia as a Government Business Enterprise (GBE), incorporated under the *Corporations Act 2001 (Cth)* and operated in accordance with the *Public Governance, Performance and Accountability Act 2013 (PGPA Act)*.

NBN Co is committed to responding to the digital connectivity needs of Australians, working with industry, governments, regulators and community partners, to lift the digital capability of Australia.

As a GBE, the principal responsibility of NBN Co is to build and operate the National Broadband Network in accordance with the Commonwealth Government's Statement of Expectations¹, 24 August 2016.

Taking a customer-led approach, the Company is committed to working with partners to enable more Australians to use the network to drive positive social and economic benefits for themselves, their businesses and their communities, and the country as a whole.

NBN Co value chain

The nbn™ network consists of a multi technology mix of broadband access technologies including fibre-to-the-node, fibre-to-premises, fibre-to-the-curb, fibre-to-the-basement, hybrid fibre coaxial, fixed-wireless and satellite. NBN Co provides RSPs with access to the network on a non discriminatory basis and through whom customers connect to the network for access to high speed internet and connection to content provided by the world wide web. Working in conjunction with customer equipment (including modems, routers and Wi-Fi connectivity devices), these access technologies serve customers with a fast, reliable and secure broadband network.

Operations

NBN Co's Internal and Extended Workforce undertake work activities that include:

- network engineering and design
- civil construction
- network assurance and operations
- facilities management
- corporate services
- product development and marketing.

NBN Co is domiciled solely in Australia with the majority of operations taking place in Australia. The Company's Australian operations are supported by some offshore suppliers who provide services including business process and IT support.

NBN Co operates through a unique service delivery model, engaging both role-based and outcomes-based workers to deliver core activities and corporate functions. The NBN Co Resource Engagement Policy lays out how the Company's role-based, and outcomes-based workers are managed.

Role-based workforce: as at 30 June 2020, NBN Co directly engaged approximately 6,200 workers consisting of Company employees and contractors (temporary staff augmentation, (TSA)).

Outcomes-based workforce: large, indirect supplier-based workforce (approximately 11,000 as at 30 June 2020), comprising workers delivering a range of services to NBN Co such as constructing and maintaining the Network, Business Process, IT Support and Facilities Management services.

¹ <https://www.communications.gov.au/publications/nbnstatementofexpectations>

Supply chain

NBN Co actively manages the Company’s suppliers, including identifying and managing contracts, its supplier database and the goods and services suppliers provide.

NBN Co has focused on developing strategic, long-term relationships with key suppliers in each of the Company’s main spend areas. While small in number, they represent the majority of the Company’s spend.










These key suppliers have mature corporate policies and business processes, and understand NBN Co’s values and expectations (as reflected in the Company’s Supplier Code of Conduct). NBN Co’s supplier governance forums also support active conversations around operations, and supply chain management.

NBN Co has utilised a network of 3,328 suppliers to complete the initial build² of the nbn™ network. More than 87 per cent of the suppliers were based in Australia, and 98 per cent of total expenditure was with these suppliers. The largest category of total expenditure was 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. Equipment and services were sourced from suppliers in 21 countries including Australia, the United States, France and Singapore.

The supply chains that support the Company’s infrastructure and customer equipment are supported by a joint industry agenda, where retail service providers, regulators, policymakers and broader industry stakeholders work together to improve customer outcomes, including addressing factors that are outside NBN Co’s control but nevertheless impact customer experience.

² NBN Co’s build completion commitment was that all standard installation premises in Australia are able to connect to the nbn™ access network as at the build completion date. This excludes premises in future new developments which will be an ongoing activity for the Company beyond the build completion date. It also excludes a small proportion of premises defined as ‘complex connections’ - which includes properties that are difficult to access, culturally significant areas and heritage sites - where connection depends on factors outside NBN Co’s control such as permission from traditional owners, and where network construction to allow such premises to connect will be an ongoing activity of NBN Co beyond the build completion date.

NBN Co Supply Chain by Key Risk Category

Procurement Type	Approx. # of suppliers	Description
 Telecommunications and network equipment, software, and related services	43	Supply of equipment and software by mostly global suppliers. Suppliers utilise offshore facilities for the manufacturing of equipment and software, predominantly in Asia. A mix of Australian and offshore personnel provide the related services.
 IT equipment, software, and related services	176	Supply of equipment and software by mostly global suppliers. Suppliers utilise offshore facilities for the manufacturing of equipment and software. A mix of Australian and offshore supplier personnel, predominantly in Asia, provide the related services.
 Business outsourced services	6	Supply of outsource services for business-related back office operations. A mix of Australian and offshore personnel, predominantly in Asia, provide the related services.
 Construct and operate services	45	Supply of network infrastructure design, construct, operate and maintain services by predominantly Australian suppliers. Subsets of those services (e.g. some network design and call centres) are delivered offshore.
 Cleaning and Security services	2	Supply of cleaning services to network infrastructure buildings, waste management, and security services for NBN Co premises. All services are delivered by suppliers within Australia.
 Corporate and network building leases	50	Supply of corporate offices (cleaning services managed by lessor), and network infrastructure buildings. All leases are located in Australia.
 Network land leases	1,780	Land leases with landowners for placement of NBN Co fixed wireless infrastructure (antennae placement). All leases are located in Australia.
 Uniforms and PPE	7	Supply of uniforms and personal protection equipment for use by NBN Co personnel and its delivery partners. Australian suppliers supplying goods predominantly manufactured in Asia.
 Other	>1,250	Supply of services including (but not limited to): consultancy, financial services, freight and logistics, hospitality and travel, human resources, legal, marketing, and training. The majority of the suppliers deliver these services within Australia.

Message from the CEO

Acting on modern slavery is not only about doing what is expected of us, it is about doing what is right

Building the nbn™ network across Australia has ushered in a new era of competition for the nation’s telecommunications industry. But more importantly, it has helped empower businesses, households, and communities with the broadband services they need to remain informed, educated, productive and socially connected.

Access to fast, reliable broadband has never been more important. It has made the world smaller and global markets larger. But as markets continue to grow, we must strengthen our resolve, our capabilities and our networks to ensure we treat each other – no matter our backgrounds or where we come from – with dignity, respect and care.

So as we extend the social and economic benefits that fast broadband enables, we must also do so in a way that does not adversely, or indirectly, affect the lives of those at risk from modern slavery.

At NBN Co, we possess uniquely complex operations and supply chains that leverage products and services from both domestic and international markets. This gives us a unique responsibility and opportunity to work with our stakeholders – in both Australia and abroad – to reduce the risk of modern slavery.

This is a responsibility we take very seriously. It aligns with the transparent and accountable foundations that underpin our recently released Sustainability Report, and our ambitions to always protect the rights and wellbeing of individuals and the environment.

As we move through the next phase of bringing the benefits of the nbn™ network to more homes and businesses, we must also evolve our operations and supply chains to reflect our increasing focus on sustainability and key issues including modern slavery.

Our first ever modern slavery statement will play an important role to establish the baseline for our future reporting on this issue. It will set the markers to help us remain accountable, transparent and fair. And it will help track our progress against the ambitions we have to fight the scourge of modern slavery.

During this first reporting period we have focused on understanding the completeness and adequacy of NBN Co’s existing systems and processes to identify and address any

instances of modern slavery within our operations and supply chains.

We have also updated policies, procedures and training to make them more targeted towards issues of modern slavery while also increasing our engagement and communication with suppliers to ensure we are more accountable together.

While these tools and processes will help us establish the systems we need to identify and respond to modern slavery, we know that our best resource against the social scourge of slavery will always be our people. By continuing to foster a thriving culture of transparency, accountability and responsiveness, we know that our people will be in the best position to identify, address, and speak out against modern slavery.

No man, woman or child should ever be put in the situation where their labour is exploited, their financial freedom held hostage, or their access to opportunity and the ability to succeed bartered away.

That’s why the act of reducing modern slavery is not only about doing what is expected of us, it is about doing what is right. It’s about responsibility, and purpose – and only by working together can we address this once and for all.

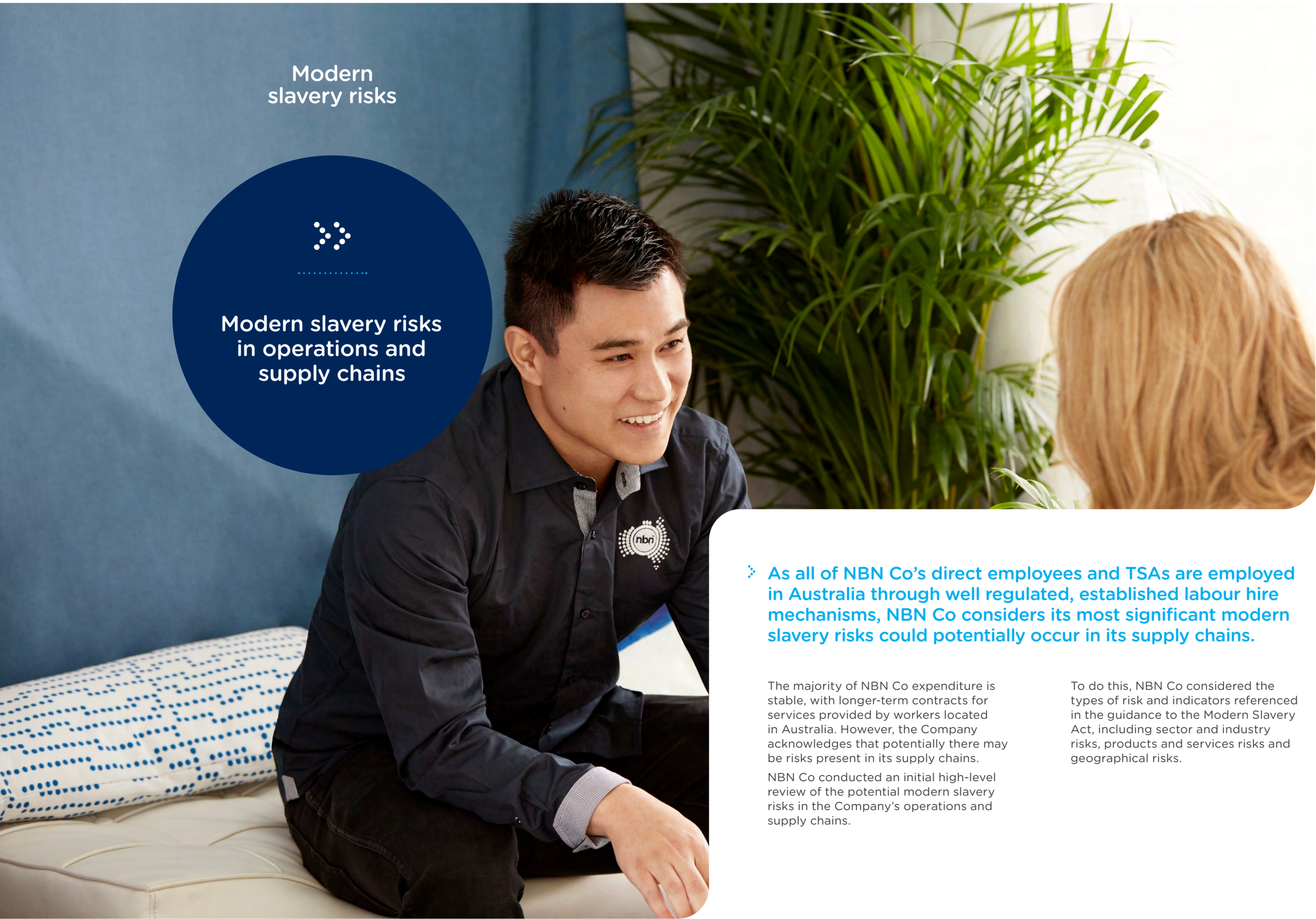
Stephen Rue
Chief Executive Officer



Modern slavery risks



Modern slavery risks in operations and supply chains



❖ **As all of NBN Co’s direct employees and TSAs are employed in Australia through well regulated, established labour hire mechanisms, NBN Co considers its most significant modern slavery risks could potentially occur in its supply chains.**

The majority of NBN Co expenditure is stable, with longer-term contracts for services provided by workers located in Australia. However, the Company acknowledges that potentially there may be risks present in its supply chains.

NBN Co conducted an initial high-level review of the potential modern slavery risks in the Company’s operations and supply chains.

To do this, NBN Co considered the types of risk and indicators referenced in the guidance to the Modern Slavery Act, including sector and industry risks, products and services risks and geographical risks.

Based on available information and discussions with subject matter experts, NBN Co has identified the following as potentially higher-risk areas due to characteristics such as geography, nature of the work, labour intensity and vulnerable populations.

Network and IT equipment manufactured offshore



According to KnowTheChain, there is an increased risk of modern slavery occurring in this industry, in part, due to the prevalence of migrant workers who are more vulnerable to exploitation as they are less likely to know their labour rights and entitlements.

Source: KnowTheChain

Manufacture and supply of components is primarily concentrated in potential 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, NBN Co acknowledges that this remains its most potentially at-risk category.

NBN Co will be focusing on this category in FY21.

Business outsourced services located offshore



Outsourced labour arrangements, especially those located offshore in higher risk geographies such as Asia, present a risk of forced labour exploitation. This is due in part to the added supply chain complexity and limited oversight of the employment conditions of workers.

Source: Open Democracy – Confronting root causes: forced labour in supply chains

NBN Co selects Business Process Outsourcing (BPO) suppliers who are global leaders with mature policies and processes. The services require skilled professionals working in corporate campus environments.

This minimises two of the variables that may contribute to modern slavery – namely isolation and low education levels.

While workers are more likely to understand their labour rights and have access to grievance policies, NBN Co continues to work with the Company’s global partners to reduce modern slavery risks.

Security and cleaning services in Australia



Both cleaning and security services sectors in Australia have been identified as higher risk for labour exploitation including debt bondage, deceptive recruitment practices and forced labour. This is largely due to the nature of these industries which often involve complex, subcontracting arrangements of a predominantly migrant workforce.

Source: Australasian Centre for Corporate Responsibility

While NBN Co has contracted with major Australian corporations with similar obligations to NBN Co, the Company understands that the complex and multi-layered labour hire and subcontracting relationships that exist within these industries continues to provide underlying potential risk. Recent procurement activities have included modern slavery as part of supplier assessment.

Offshore manufacture of uniforms and PPE



The most prevalent modern slavery risk associated with the manufacture of textiles and supply of materials is from extensive labour exploitation of vulnerable workers including women and children in geographies such as Asia. Exploitation practices in these countries that may lead to modern slavery include illegal working contracts, excessive working hours without overtime pay, harassment and unsafe working/living conditions.

Source: Global Slavery Index

All uniforms and personal protective equipment purchased by NBN Co are sourced from Australian suppliers. However as a significant proportion is manufactured offshore, there is a potential higher risk of modern slavery in both the manufacturing of the products as well as supply of materials.

Network construction



Globally, the construction sector, including the manufacture and production of raw materials, carries potential risk for modern slavery. This is due to the high demand for low-skilled labour, short-term employment contracts and the intricacies of sub-contracting in that sector that veil recruitment and employment practices from clear sight.

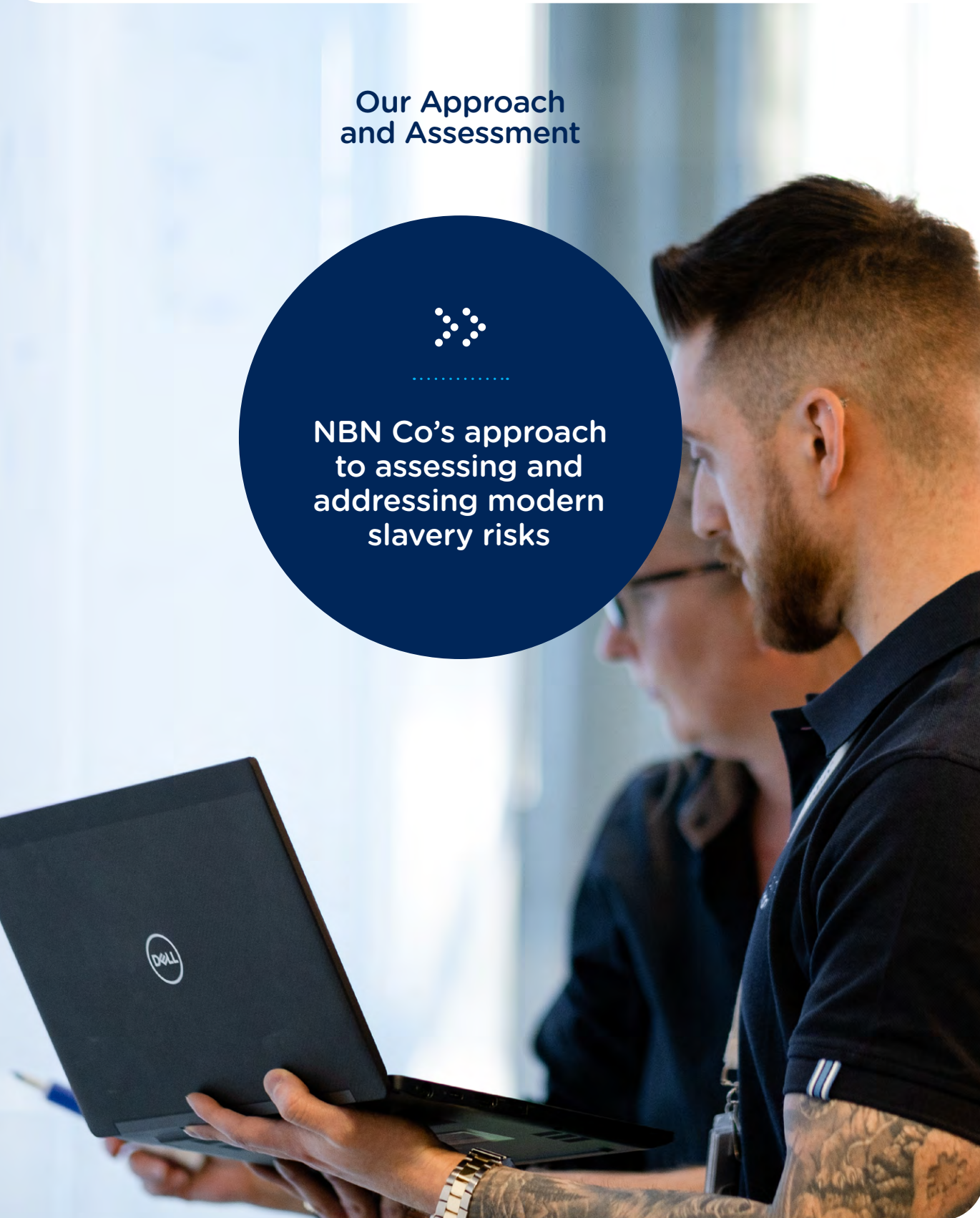
Source: Australian Human Rights Commission

NBN Co’s Australian construction labour risk is reduced through extensive use of well established, mature Tier 1 suppliers with specific contractual obligations, including adherence to industrial laws and the Security of Payment Acts. Equitable labour rates are a component of NBN Co’s supplier pricing review. Workers are skilled, mobile and have access to NBN Co’s Whistleblower policies.

Our Approach and Assessment

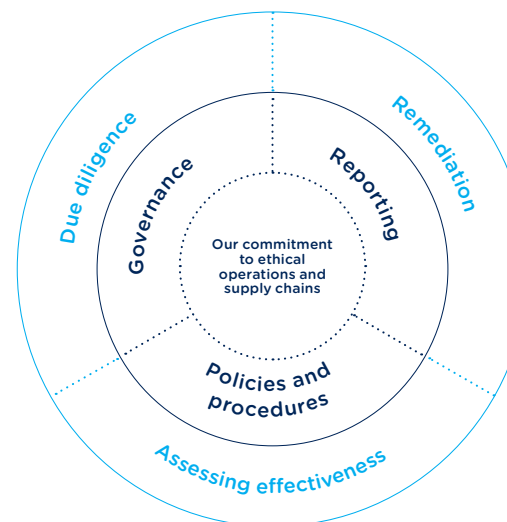


NBN Co's approach to assessing and addressing modern slavery risks



Ethical Operations and Supply Chain Management

NBN Co's approach to assessing and remediating modern slavery risks is multifaceted. It starts with the Company's approach to ethical operations and supply chains. This approach is supported by strong governance, reporting and procedural structures. These foundational structures govern the actions the Company takes to ensure appropriate due diligence, assessment and remediation practices. Each of the component parts of NBN Co's approach work together to help manage risks across its operations and supply chains and will evolve over time as the Company's approach to modern slavery matures.



Prioritising ethical operations and supply chain management

In FY20, NBN Co developed a Company-wide Sustainability Program to support and guide the Company's increasing sustainability ambitions. This program identifies six material topics where NBN Co will focus its sustainability efforts in the coming years.

One of the topics, 'Transparent and accountable business', demonstrates NBN Co values through ethical and sustainable business practices. This includes maturing the Company's ethical supply chain management approach, particularly with regard to modern slavery. This material topic aligns with the United Nation's Sustainability Goals 8. Decent Work and Economic Growth, 11. Sustainable Cities and Communities and 12. Responsible Consumption and Production.

In FY20, NBN Co completed a maturity assessment of the Company's modern slavery management against the requirements of the Act. This assessment leveraged an independent third party's Human Rights Due Diligence Framework. The framework compared NBN Co against leading practice and identified opportunities to continually improve the Company's modern slavery governance, risk management, reporting processes and controls. For more on how NBN Co is prioritising its ethical operations and supply chain management and Sustainability Program, see the [NBN Co FY20 Sustainability Report](#).

Modern Slavery Governance and reporting

As a result of NBN Co’s continued focus on ethical operations and supply chain management, in FY20 a need was identified to further clarify and assign specific roles and responsibilities for assessing and addressing modern slavery risks across the business. Oversight and overall responsibility for modern slavery risk management has been assigned to the Chief People and Culture Officer (CPCO) and the Chief Financial Officer (CFO). These executives will be supported by the executive-led Sustainability Committee.

The Committee has representation from relevant Business Units (including but not limited to People and Culture, Finance and Risk) and will oversee and track the successful implementation of the Sustainability Program including modern slavery. The Modern slavery reporting plan, strategy and annual workplan will be reviewed, and monitored by the CPCO, CFO and NBN Co Sustainability Committee. The Committee plans to meet quarterly to provide sustainability leadership across NBN Co.

NBN Co will also clearly define the roles and responsibilities of specific Business Units to help manage modern slavery risks for both operations and supply chains.

Key policies and procedures for managing modern slavery risks

NBN Co policies and procedures are another essential part of the way the Company identifies and addresses modern slavery risk and they help ensure practices are compliant with its legislative obligations.

Supplier Code of Conduct

NBN Co and its suppliers all have a part to play in conducting ethical and responsible businesses and ensuring human rights abuses are not permitted in the Company’s supply chains. The Supplier Code of Conduct (the ‘Supplier Code’) clearly articulates NBN Co’s expectations of its suppliers, when it comes to responsible procurement, and is formally incorporated into contracts.

Suppliers are expected to ensure that their owners, employees, subcontractors, agents and other parties (including Group entities) comply with this code.

The Supplier Code is reviewed and updated each year to ensure currency to NBN Co’s evolving expectations.

Code of Conduct

The Code of Conduct (the ‘Code’) contains NBN Co’s expected standards of behaviour and applies to all direct employees, TSAs and Extended Workers. The Code states that NBN Co will not tolerate unacceptable or disrespectful behaviour, including engaging in conduct that breaches or has the potential to breach relevant modern slavery legislation. In addition to complying with the standards, TSAs and Extended Workers are required to adhere to any other specific requirements provided for in NBN Co supplier contracts.

NBN Co’s Whistleblower, Managing Workplace Grievance and Complaints Handling policies are also crucial to the Company’s management of modern slavery. These are further explored in the section Grievance handling and remediation.

Training in NBN Co policies and procedures

Training is key to ensuring NBN Co teams are aware of standards and policies, can identify and assess risks, and are equipped to respond. NBN Co conducts mandatory quarterly training on the key policy suite, known as NBN Co Business Standards, including training on *Your Ethical Responsibilities (Fraud, Corruption and Whistleblower)*; *Freedom of Information*; *Code of Conduct*; and *Risk Management*. Direct NBN Co employees, and TSAs, are all expected to complete this training. Extended Workers complete this training during their onboarding orientation.

In FY20 a new Modern Slavery Awareness training module was rolled out to the Company’s Procurement team.

Developed by an Australian registered training organisation, in conjunction with an international legal service provider, this training was delivered to highlight the key aspects of the Act and provide the team with the foundational understanding to identify and respond to risk and/or instances of modern slavery in the supply chains. The module was completed by the Procurement team in FY20 and included topics such as:

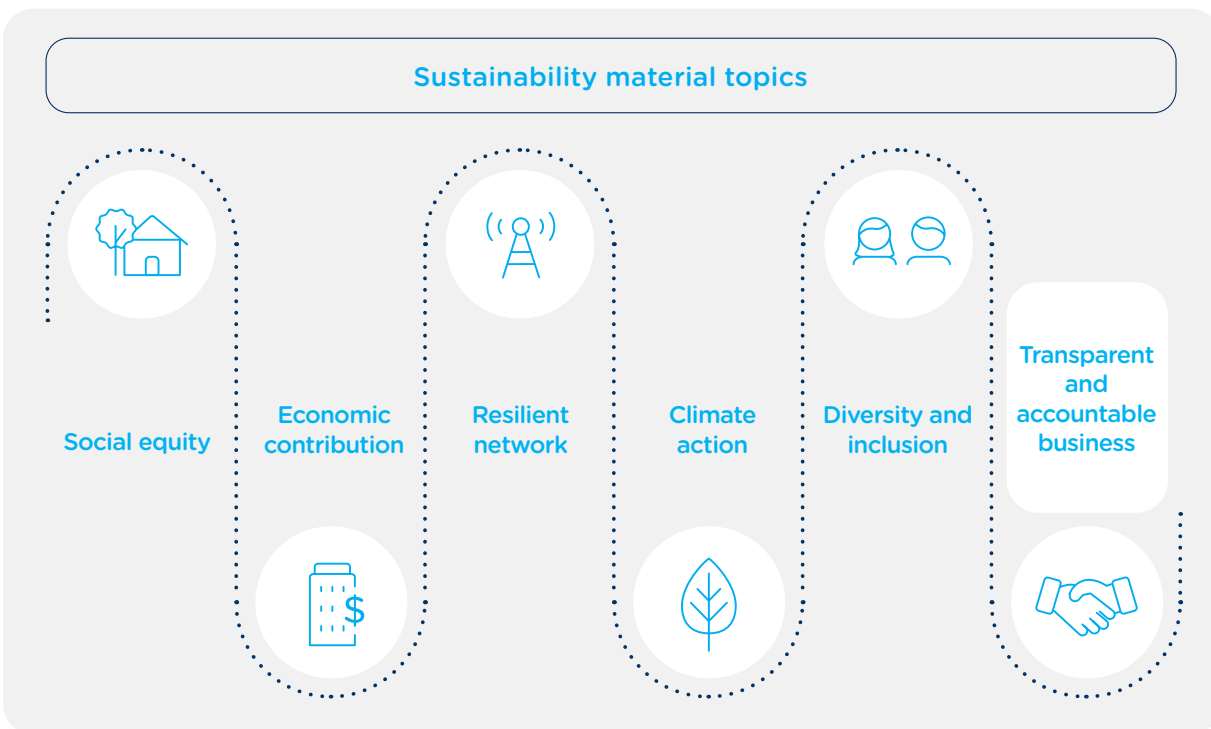
- *What constitutes modern slavery including definitions and case studies*
- *Indicators of modern slavery*
- Information on ‘getting help’.

Due diligence

Due diligence in NBN Co supply chains

NBN Co has in place processes to identify and assess modern slavery risks for all new suppliers/purchases of goods and services over \$5,000 AUD. This includes:

- A requirement to undergo a supplier risk assessment using NBN Co Buyers Risk Assessment Tool. A new question to address modern slavery, was added to the assessment tool during the reporting period.
- Suppliers are now required to complete modern slavery questions when participating in procurement process for significant contracts.
- All supplier contracts (excluding some legacy contracts which are expected to be transitioned over time) include reference to the Supplier Code of Conduct.
- Management meetings with NBN Co’s key strategic suppliers occur on a regular basis to discuss supplier performance against requirements stipulated in their contracts.
- Updating NBN Co Procurement Risk Register to include modern slavery as a risk. This will mean modern slavery risks in the supply chain are specifically considered as part of the existing Enterprise risk management processes.





Due diligence in NBN Co operations

NBN Co recruits and manages role-based employees through processes and procedures to comply with relevant employment legislation. NBN Co has robust recruitment and employment contract management processes and procedures for direct employees to help ensure the Company operates and recruits talent in a fair, open and transparent process. The People and Culture team has oversight and responsibility for ensuring legal compliance in relation to role-based employees.

All potential NBN Co role-based employees undergo extensive background checks which include Australian right to work, 100 point ID collection, National and International criminal search and employment verification. Formalised working rights must be obtained from the Australian Government for the entire employment term for non-citizens and non-permanent residents. As stipulated in NBN Co contracts with recruitment partners these stakeholders are expected to act in accordance with NBN Co policies, guidelines and procedures.

NBN Co has negotiated a series of Enterprise Agreements with relevant unions. These agreements help to protect the rights of NBN Co employees and ensure the Company fulfils its contractual and legal obligations.

While NBN Co recruitment and employment policies and procedures were not developed with the express purpose of managing the risk of modern slavery in NBN Co operations, the Company considers the existing controls sufficient to manage the risks of modern slavery in NBN Co's direct workforce.

Grievance handling and remediation

Identifying and mitigating risks of modern slavery is a crucial first step. However, no matter how robust the Company practices might be, NBN Co is committed to providing for, or participating in remediation of, any confirmed instances of modern slavery and implementing the required actions to prevent reoccurrence.

The NBN Co Whistleblower Policy sets out the process for individuals to disclose, either anonymously or otherwise, their concerns regarding potential undesirable conduct or wrongdoing without fear of reprisal and with the support and protection of NBN Co.

As part of NBN Co's Whistleblower Process, NBN Co uses KPMG Faircall to handle whistleblower disclosures - a reporting hotline administered by an external and independent third party (KPMG Australia).

The internal Managing Workplace Grievance Policy applies to all direct employees, TSAs and Extended Workers working at NBN Co and ensures clarification on what is recognised as a workplace grievance, the principles and processes that the Company will follow in addressing a grievance and the possible informal and formal options for resolution.

The Complaints Handling Policy provides information about the framework that is in place for handling complaints about NBN Co and NBN Co related activities. The policy covers complaints from a wide range of stakeholders and covers complaints made about all employees, contractors and consultants of NBN Co.

Assessing effectiveness

NBN Co has in place a three lines of defence model to managing risk and assessing performance through audits, reviews and inspections of the supply chain and operations.

- **Line 1.** NBN Co Business functions and employees are responsible for identifying, assessing and managing risks in the course of doing their role, in accordance with the Company's policies, procedures and codes of conduct.
- **Line 2.** NBN Co Enterprise and Business unit risk and assurance functions provide oversight of the risk management activities of the Company's First Line. These risk and assurance functions are dispersed between the Group Risk team and key business support teams to provide guidance and advice on managing risks and ensuring risk practices are appropriately designed by the first line and are operating as intended.

- **Line 3.** Internal audit is responsible for providing NBN Co's Board and management with independent and objective governance of the Company's key risk areas and processes including risk management activities undertaken by the First and Second Line. A risk based approach to audit activities is undertaken to ensure actions are prioritised.

During the first reporting period, NBN Co has focused on understanding the completeness and adequacy of its existing systems and processes to identify and address modern slavery within its operations and supply chains.

A critical component of this was NBN Co undertaking a comprehensive review of the Company's modern slavery risk management systems. With input from subject matter experts, all elements of NBN Co modern slavery risk management arrangements including governance, training and supply chain monitoring were reviewed. A detailed work plan has been prepared to implement process improvements. For more information about improvement actions refer to 'Our future'.

While undertaking this review, the Company continued to improve the effectiveness of its modern slavery risk management processes by:

- Clarifying roles and responsibilities within the Company for managing modern slavery risks
- Assigning Executive responsibility for modern slavery risk management to the Chief People and Culture Officer and the Chief Financial Officer
- Updating relevant NBN Co policies and procedures such as the Supplier Code of Conduct to reference modern slavery or the circumstances that may lead to modern slavery
- Continue to monitor the performance of suppliers to comply with contract requirements
- Development of modern slavery awareness training, completed by the Procurement team during FY20.

The Company is committed to implementing this work plan and to continually improve its processes and future effectiveness managing the risk of modern slavery.

Response to COVID-19

While NBN Co is proud of the way the Company has supported Australians through lock-down, the Company recognises that COVID-19 brings additional health and safety risks for employees and suppliers, including potential risks of modern slavery.

During the pandemic, NBN Co continued its operations through remote working, enabling it to maintain business processes and oversight of its supply chain by:

- Continuing to engage with suppliers
- Maintaining procurement processes.

Additionally, NBN Co has shown its commitment to the safety and wellbeing of suppliers and their staff by:

- Relaxation of Operational protocols, in compliance with security risk assessment, within the Company's business process outsourcing agreements to allow offshore providers the opportunity to work remotely from their homes
- Communications with suppliers regarding COVID-19 status, issues and responses
- Working with the Company's Delivery Partners to ensure field technicians have adequate levels of personal protective equipment and safe work procedures in place
- Developing and implementing COVID-19 safety procedures and guidance for technicians in the field, including monitoring of compliance through inspections.

In its response to the pandemic, NBN Co believes it has sent a strong message that the Company does not tolerate any forms of exploitation or mistreatment across its operations and supply chains, thus serving to mitigate the risks of modern slavery.

Our future

The future of modern slavery risk management at NBN Co

With the completion of the initial build, NBN Co has shifted towards the transformation from a construction-focused company into a customer-led service delivery organisation that will help enable digitisation of Australia's economy.

NBN Co future vision

This statement has outlined the actions NBN Co has undertaken to identify and respond to risks of modern slavery across its operations and supply chain in FY20. It has also mapped out its improvement areas for FY21 and beyond to further refine the Company approach to modern slavery, including an increased focus on due diligence, remediation and evaluation processes to improve and assess the effectiveness of NBN Co actions.

NBN Co plan for FY21 and beyond

- Undertake an in-depth modern slavery risk assessment with causation analysis of operations and supply chains. Monitor the implementation of the resulting risk mitigation plans.
- Develop a strategy that sets out how NBN Co will systematically identify, prevent, mitigate and remediate modern slavery risks and impacts in the Company's operations and supply chains.
- Continually revise NBN Co's modern slavery governance structure to ensure the Company has clear accountabilities, sufficient resources and effective monitoring and reporting.
- Extend initial modern slavery training to more direct employees and TSAs.
- Enhance NBN Co's modern slavery due diligence including updating existing systems and developing new ones where necessary.
- Develop a clear and documented approach to responding to and remediating allegations of, or actual instances of, modern slavery.
- Develop a modern slavery reporting plan to inform senior management, and external stakeholders and publish the annual modern slavery statement.
- Develop a monitoring process to periodically assess modern slavery risk management across operations and supply chains.
- Prepare an annual workplan which includes activities, targets and key performance indicators that will enable NBN Co to implement a continuous improvement approach to compliance with modern slavery obligations.

Approval

This statement was approved by the Chief Executive Officer and Board of NBN Co Limited 23 March 2021.

Signed,

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Disclaimer - forward looking information

This Modern Slavery Statement contains various protections and other forward-looking information. These projections involve known and unknown risks, uncertainties and other factors beyond control that may cause NBN Co's actual performance or achievements to be materially different from any future performance or achievements.

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