

Optus Modern Slavery Statement 2026

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Acknowledgment of Country

Optus acknowledges the Traditional Custodians of the lands, waters and skies across Australia. We pay our respects to Elders past and present and honour the strength and continuity of the world’s oldest living cultures.

We recognise that connection and communication have always been central to First Nations communities. We are committed to learning from this legacy and to supporting a future where connection is accessible, safe and inclusive for all.

Artwork – ‘Community and the Ocean’

Like ocean currents that carry life and stories across distances, telecommunications connect people, ideas and cultures. Both shape how communities grow and belong, reminding us that every connection—seen or unseen—has the power to unite.

The Yarrabah community shares a deep cultural bond with the ocean, central to identity, stories and life. This collaborative work reflects respect for sea Country, shell life as storytellers, and water as a life-giving force—honouring resilience, culture and ongoing custodianship.

Artists

All artists are from Yarrabah Arts Centre: Edna Ambrym, Christopher Harris, Valmai Pollard, Michelle “Mickey” Yeatman, and Philomena Yeatman.



About this Modern Slavery Statement

Our Modern Slavery Statement (Statement) has been published as a joint Statement in accordance with section 14 of the Modern Slavery Act 2018 (Cth) (MSA). It sets out the actions taken by our reporting entities, and the entities they own and control, to assess and address the modern slavery risks in our operations and supply chain.

This Statement is made by Singtel Optus Pty Limited and other relevant reporting entities within the Optus group of companies for the 2026 financial year reporting period (1 April 2025 – 31 March 2026). The reporting entities covered by this Statement are listed in Appendix 1.

The Optus group of companies comprises Singtel Optus Pty Limited and its wholly-owned subsidiaries. The group is overseen by the Board of Directors of Singtel Optus Pty Limited and its committees, and is part of the Singtel Group¹. This Statement is a consolidated description of the actions taken to manage modern slavery risks by the Optus group of companies.

This Statement has been prepared by our Sustainability and Sustainable Procurement teams in consultation with our Modern Slavery Working Group. The information in this Statement is correct as of 31 March 2026. Throughout this Statement, the terms ‘Optus’, ‘we’, ‘us’ and ‘our’ are used to refer collectively to the entities within the Optus group of companies.

This Statement forms part of our broader sustainability reporting suite, which is available on our website at www.optus.com.au/about/sustainability/reporting. This Statement supports our commitment to building a stronger Optus, listening to our customers’ needs and investing in our people, partnerships, communities and technology to create a better, connected future for Australia.



¹ The Singtel Group refers to Singapore Telecommunications Limited (“Singtel”) and the group of companies owned and/or controlled by Singtel.

What is modern slavery?

Within this Statement we apply the MSA’s definition of Modern Slavery, which is an umbrella term used to describe serious exploitation that occurs in situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Modern slavery practices can include:

- Trafficking in persons
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Deceptive recruiting for labour services
- Forced marriage
- Child labour

A Message from our Chairman and CEO

Modern slavery remains one of the most serious human rights challenges in the world today. It exists in every country and across many industries. Often hidden from view, it can cause profound harm to those impacted.

As a large organisation with a complex, global supply chain, Optus has a responsibility to understand where these risks may exist and to act. This is much more than a compliance obligation, it is part of being a responsible business and living by the values we expect of ourselves and our partners.

We have a zero-tolerance approach to modern slavery practices. Put simply, there is no place for it across our operations or supply chain. We also know this work is never finished. It demands ongoing vigilance, strong governance and collaboration. No organisation can address these issues alone, which is why we continue to work closely with suppliers, industry partners and other stakeholders to strengthen awareness, build capability and improve outcomes across the telecommunications sector.

Over the past year we have continued to strengthen our approach.

This has included:

- Expanding our on-site social audit program to improve visibility across our supply chain;
- Strengthening our Supplier Code of Conduct;
- Enhancing modern slavery requirements with our Global Contact Centre partners; and,
- Participating in collaborative supplier audits through the Joint Alliance for Corporate Social Responsibility.

These actions matter. They strengthen our ability to identify, assess and manage modern slavery risks across our operations and supply chain. At the same time, we recognise risks can evolve over time, and our approach must continue to evolve with them.

This Statement outlines the progress we have made during the reporting period as well as the work that remains ahead. While we are encouraged by the steps we have taken, we also know there is more to do. We remain committed to strengthening our approach, listening and learning from others, and playing our part in addressing modern slavery risks in line with the expectations embodied in the Modern Slavery Act and the United Nations Guiding Principles on Business and Human Rights.

We welcome feedback on this Statement and our approach as we work to continually improve our actions to manage modern slavery risks.

John Arthur
Chairman



Stephen Rue
Chief Executive Officer



Our structure, operations, and supply chain

As Australia’s second largest telecommunications provider, we have an important role to play in combatting modern slavery.

Structure

The Optus group of companies is part of the Singtel Group.

The Singtel Group is Asia’s leading communications technology company that, through its associates, has a combined 824 million mobile customers across 20 countries. The Optus group of companies is Australia’s second largest telecommunications provider and provides more than 12 million services to customers across Australia each day. In addition, Optus operates a range of wholly-owned subsidiaries that provide support services for our operations, including related to engaging Optus staff and performing network, customer service, management and billing services, among others.

Optus is headquartered in Macquarie Park, New South Wales, and we have offices and retail outlets across all states and territories of Australia, employing 7,281 people on casual, regular, and fixed term arrangements. Our key teams that support our modern slavery response include Corporate Affairs & Marketing, Global Contact Centres, Internal Audit, Legal, People and Culture, Process and Operational Excellence, Risk, Sustainability, and Sustainable Procurement, all of which are represented in our Modern Slavery Working Group.

7,281
employees

300+
contingent* workers
within our Australian
operations

Approximately
4,600
external services
workers, of which around
85% are frontline contact
centre workers



*Contingent workers are not employees of Optus. Rather, contingent workers are individuals engaged or sourced through a recruitment service or payroll service provider, where the provider is part of Optus’ approved supplier panel. They perform work at Optus on a temporary or interim basis.

Operations

Optus provides telecommunications services to support retail, government, and enterprise customers, and the telecommunications market.

Our comprehensive range of telecommunications products and services for retail customers includes mobile and fixed line telephone services, fixed and mobile broadband services, multimedia entertainment and technology, and converged business telecommunications and applications and solutions to small and medium sized businesses, enterprise and government customers.

Optus has 250 stores across Australia. In 2026, our nationwide retail network operated under the Optus brand, including all proprietary, franchisee, and licensee stores.

During the reporting year we began a transition process to assume direct control of all our licensee stores to enable us to improve accountability and transparency, and create a consistent approach to our systems and processes. By 31 March 2026, we had direct control of 72 stores, with 65 to be finalised in FY27.

We provide network coverage to 99% of the Australian population², with 5G coverage to 88% of the Australian population.

Telecommunications market

We service the telecommunications market through our wholesale business, which sells access to our communications network to other telecommunications service providers. In addition, we have agreements with business partners overseas that provide telecommunications roaming services to our customers who are travelling outside Australia. In some cases, these roaming services are provided by other entities in the Singtel Group.



² Our network coverage maps for ‘Coverage Layers – Outdoors’ on our website exclude external antenna coverage.



Collaborating with our suppliers is essential to effectively address the modern slavery risks in our supply chain. We are committed to developing strong and transparent partnerships with our suppliers as we work together to manage our shared modern slavery risks.”

Janine Harrison, Optus Associate
Director, Sustainable Procurement

Supply Chain

In 2026, Optus sourced goods and services from 1,079 direct suppliers.

What we procure from our suppliers

Approximately 96% of our procurement spend with our direct³ suppliers was in the following categories:

Mobile Devices Such as mobile phones and tablets for our customers and employees, wearable devices and customer premises equipment (including routers, modems and handsets)	Optus Spend 34%
Technology Professional Services Such as partners supporting and delivering IT projects and programs	17%
Network and Equipment Such as equipment to power Optus Network infrastructure including 5G and satellite infrastructure	15%
Media and Marketing Such as online and offline advertising, including TV and content	9%
IT and Equipment Such as IT and equipment used in offices and retail stores	9%
Building and Construction Such as infrastructure investments, including our retail footprint	5%
Professional Services Such as strategic and consultancy services	5%
Contact Centres Including contracted workers to support our customers	2%

A significant proportion (49%) of our supplier spend is in the Mobile Devices and Network and Equipment procurement categories, which is concentrated across approximately 370 of our direct suppliers. The number and size of our direct suppliers’ businesses can vary significantly across our procurement categories, which is factored into the risk-based approach to assessing our modern slavery risks in the supply chain.



³ Optus’ direct suppliers are those suppliers where Optus has a contractual agreement in place

The location and number of our direct suppliers

Note: Goods Received are products or services that have been delivered to and received by Optus based on the date of the Purchase Order.



While 94% of our direct suppliers are based in Australia, we acknowledge that many may also operate in, or source their products and services from, other countries where the prevalence of modern slavery may differ to Australia. Given this, the capacity and capability of our suppliers to manage their modern slavery risks is varied, which can also affect our ability to use our leverage to influence supplier practices.

Prevalence of modern slavery is based on 2023 Global Slavery Index data (<https://www.walkfree.org/global-slavery-index/>). Procurement categories listed represent the key goods and services by country and are not representative of all Optus procurement in these locations.

Our direct supplier data is based on the country of origin of the supplier entity that is contractually engaged by Optus. This may be different to the location of our suppliers' global parent company and may not reflect the country where the product or service is manufactured or sourced.

- New Zealand (9)

Ireland (8)

Canada (6)

Israel (3)

Denmark (3)

China (2)

Germany (2)
- Netherlands (2)

South Korea (2)

Taiwan (2)

Switzerland (2)

Belgium (2)

Malaysia (1)

Thailand (1)
- Spain (1)

Romania (1)

France (1)

Czech Republic (1)

Lithuania (1)

Finland (1)
- Austria (1)

United Arab Emirates (1)

Norway (1)

British Virgin Islands (1)

United Kingdom (33)

Goods Received: <1%
Modern slavery prevalence: 1.8
Key goods/services procured:
Media and Marketing;
Technology Professional Services;
Networks Technology and Equipment

India (6)

Modern slavery prevalence: 8.0
Key goods/services procured:
Contact Centres

The Philippines (0)

Modern slavery prevalence: 7.8
Key goods/services procured:
Contact Centres

Singapore (19)

Goods Received: 1%
Modern slavery prevalence: 2.1
Key goods/services procured:
Information Technology and Equipment;
Technology Professional Services;
Media and Marketing

Australia (897)

Goods Received: 94%
Modern slavery prevalence: 1.6
Key goods/services procured:
Information Technology and Equipment;
Networks Technology and Equipment;
Professional Services



Identifying our modern slavery risks

We are committed to respecting all human rights, including the right to freedom from slavery.

Optus' salient human rights risk assessment identifies the areas where the most severe actual or potential human rights impacts could occur through our business activities or business relationships, including impacts related to modern slavery.

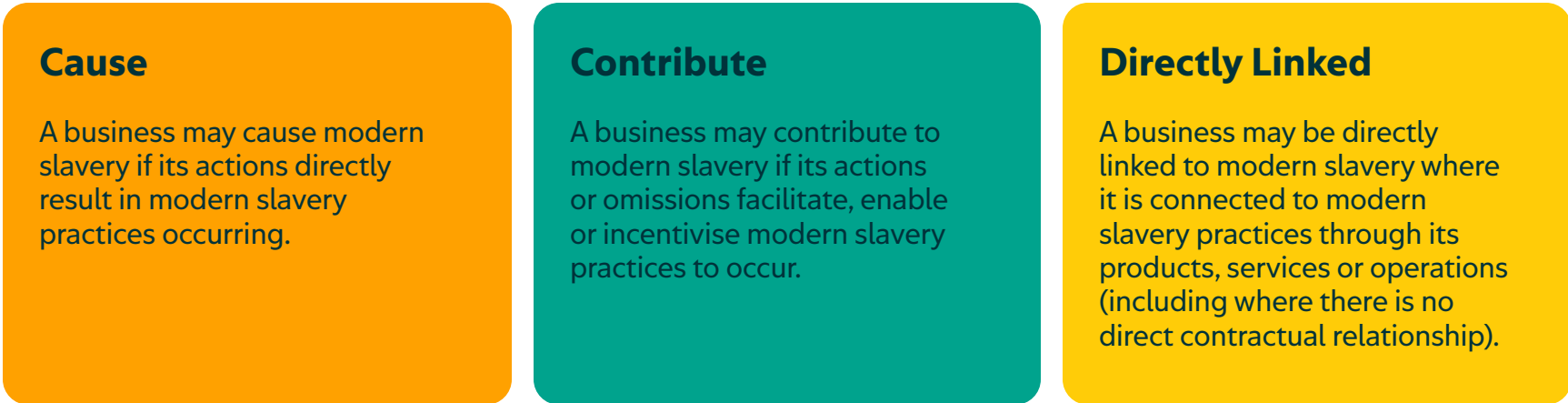
Our assessment considers the severity of impacts through the lens of risk to people, rather than risk to our business, which helps to deepen our understanding of how our actions to manage modern slavery risks align with our broader work to respect human rights.

Our ongoing work to manage modern slavery risks is particularly relevant to the following areas:

- Supporting safe and fair work in our supply chain;
- Avoiding adverse human rights impacts on the communities where we operate;
- Providing a safe and equitable workplace; and
- Working to secure the safe and healthy use of our products, especially by children, recognising that children can be especially vulnerable to exploitation online.

Our modern slavery risk profile

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Australian Government’s guidance under the MSA, we understand that modern slavery risks refer to the potential for a business to cause, contribute to, or be directly linked to modern slavery through its products, operations, or the services provided by its business relationships. This ‘continuum of involvement’ identifies the different ways that entities could be involved in modern slavery, which has informed our Modern Slavery Incident Response Plan related to how we would seek to remediate modern slavery harm associated with our business activities.



Based on this approach, we have identified seven areas across our operations and supply chain where:

- There may be an elevated potential risk for modern slavery to occur if our controls were not in place or effective; and
- Where risk factors exist that may lead to the potential exploitation of vulnerable workers.

Note: Our key controls and the actions taken to manage these modern slavery risks are set out in the following section, ‘Our actions to manage our modern slavery risks’ (page 12).

The modern slavery risk profile of our operations

We have assessed that our operations have a low level of modern slavery risk for people employed directly by Optus or employed by our suppliers to support Optus’ retail and contact centre operations.

This reflects factors such as the concentration of our direct workforce in Australia and the nature of the work typically undertaken by our people. However, we recognise that there are areas of our broader operations where there is potential for Optus to be directly linked to modern slavery, as set out below.

Potential risk area	How this risk area is relevant to Optus	Potential modern slavery risk
Partner groups operating branded retail stores (Note: During the reporting year we began a transition process to assume direct control of all our retail stores. Refer to the Operations section on page 6).	We have a network of franchisee and licensee (partner) group operated stores around Australia, who are responsible for engaging employees.	• Use of franchisee and licensee arrangements may limit visibility of working conditions in partner-operated stores.
Services provided by workers in global contact centres	Our operations are supported by our suppliers’ workers based outside of Australia. For example, approximately 4,600 workers located in India and The Philippines provide contact centre services to our customers.	• Use of base skilled labour, which may include migrant workers who may be vulnerable to deceptive recruitment practices, may have limited understanding of their workplace rights and face barriers in seeking assistance. • Workers may be located in countries with differing levels of modern slavery risks, and varying legislative and other related modern slavery protections.

The modern slavery risk profile of our supply chain

We have assessed that our greatest exposure to modern slavery risks is through our supply chain.

This reflects factors such as the locations where suppliers and their sub-suppliers operate (where known), the types of workers involved in the supply chain (e.g. whether workers are part of more vulnerable groups, such as migrant or base skilled workers), and the nature of the materials used in the production of products for Optus.

We recognise there are areas of our supply chain where there is the potential for Optus to be directly linked to modern slavery, as set out on this page:



We validate our understanding of our modern slavery risks following material changes to our operations and supply chain. We do this by undertaking a desktop review of key modern slavery risk factors (including sector, product and geographic risk, and vulnerable worker profile risks) and the evidence base for modern slavery across relevant risk areas. We also draw on external expertise and information from third-party reports and tools from the Australian and United States' Governments, expert civil society groups, and other stakeholders.

There have not been any material changes to our modern slavery risk profile in 2026. We will continue to monitor our modern slavery risk profile, including additional guidance and assessments from the Australian Government and independent office holders, such as the New South Wales Anti-Slavery Commissioner.

Potential risk area	How this risk area is relevant to Optus	Potential modern slavery risk
Contractors building and maintaining telecommunications infrastructure	We engage a range of contractors in Australia to build and maintain infrastructure.	• Use of base skilled contracted labour who may have limited understanding of their workplace rights and face barriers in seeking assistance. • Use of raw materials which may involve higher modern slavery risks, including where these materials are sourced from countries with a high prevalence of modern slavery. • Potential provision of services outside business hours, which may limit visibility of exploitative working conditions.
Contractors providing cleaning, security, waste removal and other property management services	We engage a range of service providers to support our operations, including related to cleaning, waste removal, property management and security services.	• Use of base skilled contracted labour, potentially including migrant workers who may be vulnerable to deceptive recruitment practices, may have limited understanding of their workplace rights and face barriers in seeking assistance. • Potential provision of services outside business hours which may limit visibility of exploitative working conditions. • Sourcing from sectors that can involve strong pricing competition and where labour costs comprise a significant portion of suppliers' expenses, which may incentivise suppliers to reduce costs by engaging in exploitive practices.
Procurement of network and technology equipment products for resale and not for resale	We engage suppliers for: mobile devices, tablets, and accessories; network equipment, components, supplies; electrical equipment, components, supplies; electrical wire management devices and accessories; and solar panels and batteries.	• Use of base skilled contracted labour, potentially including migrant workers who may be vulnerable to deceptive recruitment practices, may have limited understanding of their workplace rights and face barriers in seeking assistance. • Use of transport and logistics services, such as shipping and warehousing, where workers may be vulnerable to exploitation, including where they work in isolated conditions (such as seafarers). • Use of raw materials, which may involve higher modern slavery risks, including where materials are sourced from countries with a high prevalence of modern slavery. • Manufacturing of components in countries with a higher prevalence of modern slavery.
Procurement of uniforms for our people in customer-facing roles	We engage suppliers for the provision of Optus branded uniforms for our technicians and employees across our retail stores.	• Use of base skilled or low wage contracted labour, potentially including migrant workers who may be vulnerable to deceptive recruitment practices, may have limited understanding of workplace rights and face barriers in seeking assistance. • Manufacturing of products in high risk countries heightening modern slavery risks.
Workers providing storage and warehousing services	We engage suppliers to provide storage and warehousing services.	• Use of base skilled or low wage contracted labour, potentially including migrant workers who may be vulnerable to deceptive recruitment practices, may have limited understanding of workplace rights and face barriers in seeking assistance. • Potential provision of services outside core business hours, which may limit visibility of exploitative working conditions.

Our actions to manage our modern slavery risks

We take a targeted risk-based approach to managing our modern slavery risks.

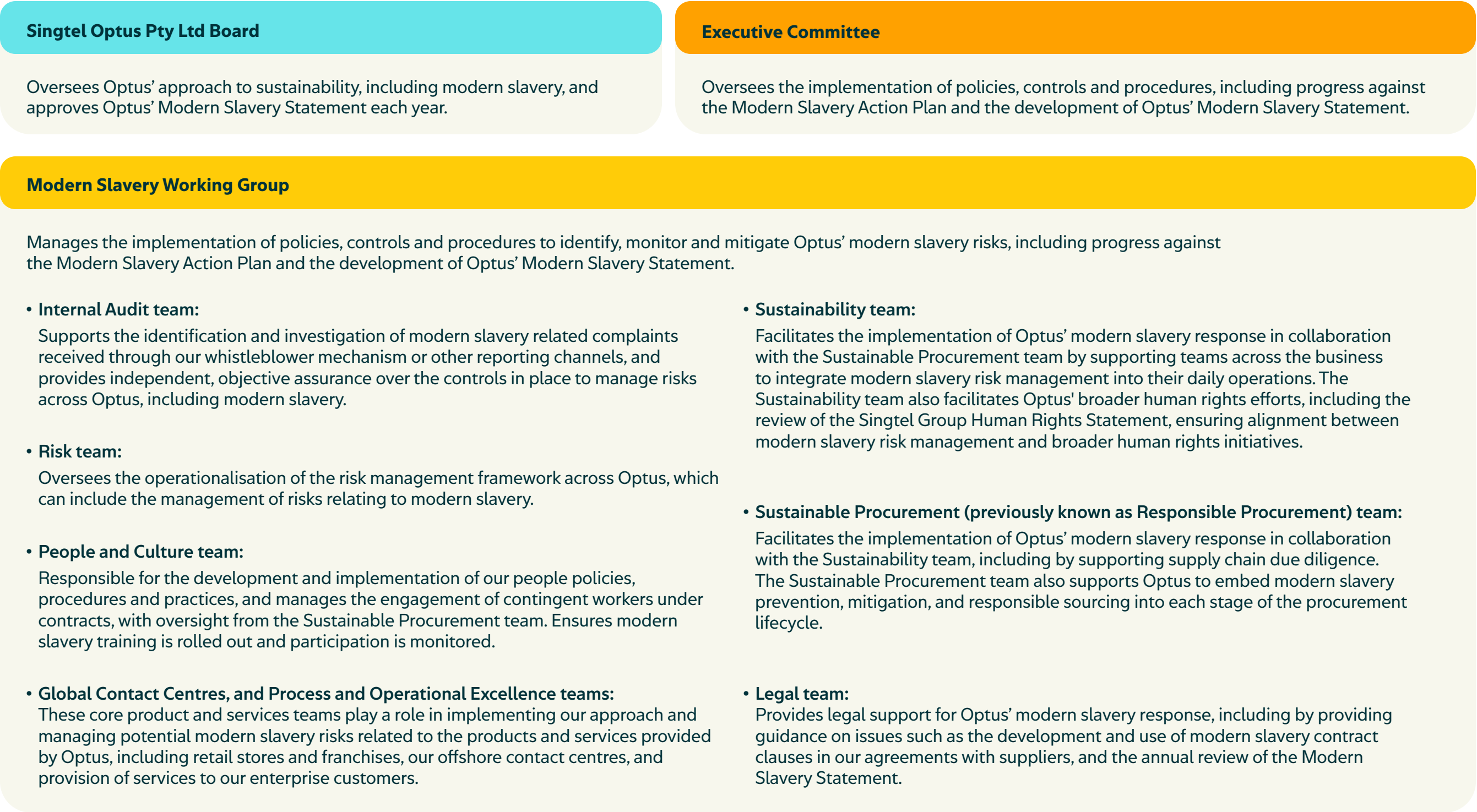
Our risk-based approach to managing modern slavery risks targets potential issues based on their likelihood to occur and the severity of potential harm to people. In 2026, our risk management approach focused on five key areas and related controls:



Governance

Our approach includes clear accountabilities for oversight and action, which is supported by our cross-functional Modern Slavery Working Group.

Our governance structure



Our policies

Optus has a detailed set of policies and guidelines to address key risks. Our policy framework guides our processes and controls, and sets the expectations for how we manage our modern slavery risks effectively.

Policy	How the policy supports our modern slavery response	How this policy is implemented
<u>Human Rights Statement</u> (Singtel Group)	Reinforces our commitment to respect all human rights standards we set for ourselves, and the expectations for the people who work for us, and on our behalf, specifically in relation to the prohibition of child labour and modern slavery.	This Statement is shared in internal communications, including via the modern slavery e-learning module available to all Optus people, and is publicly available on the Singtel Group website.
Procurement Policy	Outlines the standard process for mitigating risks related to the goods and services being acquired, including a requirement for suppliers to agree and comply with the Singtel Group Supplier Code of Conduct.	This Policy is published on our Optus intranet, and is regularly reviewed with any policy enhancements communicated across our business.
<u>Responsible Procurement Policy</u>	Outlines the standard process for mitigating risks related to the goods and services being acquired, including a requirement for suppliers to agree and comply with the Singtel Group Supplier Code of Conduct.	This Policy is publicly available on the Singtel Group website.
<u>Supplier Code of Conduct</u> (Singtel Group)	Sets the expectations of all suppliers with whom the Singtel Group (including Optus) does business, which includes expectations of suppliers related to the prohibition on the use of modern slavery in their operations and supply chains, and due diligence to manage modern slavery and broader human rights risks.	This Policy is published on the Singtel Group website, and also on the supplier portal. To do business with Optus, all suppliers must confirm their acceptance of, and comply with, the Supplier Code of Conduct, and a requirement to do so is included in contractual agreements with suppliers. In 2026, this Policy was reviewed and updated to include clauses that clarified Optus’ rights to conduct audits of supplier arrangements, and the protections we expect that our suppliers provide to protect their employees from detriment if they are or could be suspected of being a whistleblower.
Whistleblower Policy (Singtel Group & Optus)	Outlines how incidents of actual or suspected fraud, corruption or other forms of unethical conduct can be confidentially reported to the independent whistleblower hotline.	Note. In 2026, Optus developed a company specific Whistleblower Policy tailored for Optus’ context, the local legislation, and best practice guidance on whistleblowing. This Policy, which superseded but retains the key features and principles of the existing Singtel Group Whistleblower Policy, was approved by the Board on 6 August 2026. Further information on this Policy will be disclosed in Optus' 2027 Modern Slavery Statement given the release of the Policy occurred in the FY27 reporting period but the Optus Policy is publicly available on the Optus website and you can find it here .



Due diligence and risk management

Our due diligence processes are central to our modern slavery approach, helping us to identify, prevent and manage supply chain risks.

Our employment policies and frameworks

Optus has a comprehensive framework for employment, which is underpinned by industrial instruments approved by the Fair Work Commission. It provides for, at a minimum, terms and conditions of employment that meet legislative and relevant industrial instrument obligations, contracts of employment and employment related policies and benefits, which build on minimum employee entitlements.

In addition, other key measures include:

- Respecting the right of our workers to have freedom of association;
- Employees covered by the Optus Retail Agreement (2023) and the Optus Employee Partnership Agreement (2025) are consulted with in accordance with the Agreement terms; and
- Optus' payroll systems support and audit compliance with labour laws and payment of wages, and internal resources and external third parties assist with audit and remediation processes as needed.

In 2026, Optus employed 78 staff aged 18 and under (12 staff under the age of 18). These staff members performed work in our retail stores and administration areas, and were paid at the adult rate of pay under the Optus Retail Agreement (2023).

Our supplier screening process

Our third-party risk screening tool allows us to monitor suppliers for adverse media and events, including in relation to human rights issues such as modern slavery. In 2026, we applied the tool to all suppliers and the results were used to inform the supplier audit selection process, with those suppliers who received a higher risk screening result prioritised for audit.

We also screened approximately 1,000 additional suppliers via the Givvable platform, which supports us to automate our supplier due diligence assessments. In future reporting periods we will utilise this screening data to enhance the assessment of our supply chain's alignment with our modern slavery risk management and mitigation practices.

The Optus risk assessment tool, which must be completed as part of our procurement process, helps to ensure supplier-related risks are assessed and managed consistently, including modern slavery. Users of the tool must indicate whether the proposed supplier engagement will include activities undertaken offshore (such as service providers operating offshore or manufacturing products offshore) and, where this is the case, the Sustainable Procurement Team provides additional guidance on whether further assessment of modern slavery risks is required.

A supplier questionnaire relating to modern slavery risks is embedded in Optus tender materials to enhance supplier engagement and drive consistent sustainability practices, including to support our identification of modern slavery risk and, where necessary, our engagement with higher risk suppliers. In 2026, we consolidated and refined our supplier questionnaire to better support procurement category managers in evaluating supplier responses, with further enhancements planned for implementation in 2027.

Our actions to manage our modern slavery risks

Our supplier contractual terms and conditions

Aligned with our commitment to transparency, we discuss contract clauses with suppliers during contract negotiations, including clauses that require our suppliers to take reasonable steps to identify and prevent the occurrence of modern slavery in their operations, supply chain, and any third party with whom they do business. Importantly, our suppliers must notify us upon becoming aware of any modern slavery issue, and how they are implementing specific modern slavery risk management actions where appropriate.

We may also ask our suppliers for access to reports, certifications, audit reports and other information and documents, including the completion of a self-assessment questionnaire to assist us in monitoring their ongoing compliance with our contract clauses. We implement additional contractual requirements with higher risk suppliers and in 2026, this included enhancing contractual clauses with our Global Contact Centre partners to ensure all of Optus’ modern slavery-related requirements are captured. We plan to further embed contract clauses with additional suppliers in future reporting periods.

Our supplier social audit program

Our supplier social audit program provides us additional insights into how key suppliers manage modern slavery and other human rights risks and support us to identify opportunities to engage with suppliers around our expectations. This program involves a third party undertaking targeted on-site audits of selected Optus suppliers based on multiple factors, including suppliers’ potential level of modern slavery risk. We are conscious that these audits can be resource intensive for suppliers so we invest time and resources to ensure these suppliers understand the audit results and can address identified areas for improvement.

In 2026 our third-party auditor conducted 13 on-site supplier audits, including all key Contact Centre sites in India and The Philippines. All audits except one returned a range of findings across various risk domains that included labour practices, wages and hours, health and safety, management system, and working environment. The audit process included document reviews, site tours, management and worker interviews, and the assessment of processes to close out identified areas of non-conformance. During the reporting year all findings were closed within agreed timeframes. No findings from these audits were related to modern slavery. We will continue to build this audit program in future reporting periods.

Optus’ in-house Workplace Health and Safety (WHS) team conducted 700 workplace site inspections in 2026. Each inspection includes a checklist of modern slavery red-flag indicators. Where an actual or potential issue is identified, this is escalated to the Sustainable Procurement team for further investigation and, where required, an audit by our third-party auditor is commenced. No modern slavery-related issues were identified in 2026 through these inspections.

Our actions to manage our modern slavery risks

Our shared audits for common suppliers across the telecommunications sector

In 2026 the Singtel Group became a participating member of the Joint Alliance for Corporate Social Responsibility (JAC), which is a telecommunications industry association focused on sustainable supplier audits. By sharing supplier audit results with other members, our collaboration with JAC enables us to contribute to a reduction in supplier audit fatigue and streamline our own due diligence efforts.

Our engagement with JAC takes place through attendance at fortnightly calls to share best practice in auditing and collaborate with other members. We commit to undertaking audits on shared suppliers, and in turn, we can access and contribute to audit results for common suppliers across the telecommunications sector and expand our overall coverage.

In 2026 our social audit program had fully integrated the JAC audit standard which enables us to:

- Apply a consistent auditing criteria and framework that is specific to the telecommunications industry;
- Standardise the end-to-end audit process to align with other JAC members to simplify audits with suppliers; and
- Implement the principles of best practice audit management.

As a result, Optus accessed the audit reports for 27 of our direct suppliers (~23% of Optus’ total procurement spend in 2026), which accounted for ~13% of total suppliers audited by JAC in 2026.

Our engagement with suppliers

We engage directly with our tier-1 suppliers to help us understand how they manage modern slavery and other broader sustainability risks.

This complements our screening and audit processes through informal engagement, while building trusted relationships with representatives from our key suppliers. Our Supplier Engagement Roadmap helps us to prioritise our activities, re-validate risk areas, and identify targeted actions to address modern slavery risks across our supply chain.

We have established a new Supplier Relationship Management (SRM) team to strengthen strategic supplier partnerships and unlock mutual value while ensuring they align with Optus' compliance, sustainability and risk mitigation objectives. With the introduction of this team, greater emphasis will be placed on evolving our supplier audit programs from a predominantly test-based approach to a more collaborative model that fosters engagement, transparency and continuous improvement.

We have a number of mechanisms available to engage with our Contact Centre suppliers including annual surveys, periodic virtual events, and targeted sessions with contact centre workers to seek their direct feedback. In 2026 Optus’ Contact Centre Partnerships team updated attestations by relevant suppliers in Quarterly Business Review meetings to ensure access to our whistleblower hotline is available to Contact Centre workers.

We will review and refresh our Supplier Engagement Roadmap in 2027 and align any relevant actions with our modern slavery roadmap.

Training for our people

Raising awareness of modern slavery helps our people to understand the role they play in preventing and managing our modern slavery risks.

Building the capability of our people

As part of our training program, we deliver a mandatory modern-slavery e-learning module every two years to Optus leaders and all staff in key teams, such as Procurement, to maintain awareness of modern slavery risk and the expectations of them in managing that risk. The training is also made available to all other Optus staff, and is included as an e-learning course in the induction program for workers at our contact centres, which must be completed before they commence active duties in their role.

Additionally, in 2026 we conducted one-on-one modern slavery risk management sessions with the Procurement and Sustainable Procurement teams that primarily manage our Indirect, Network and IT suppliers, and category managers who are responsible for high-risk, high-value tenders such as those related to modems, transport, and on-premise cloud infrastructure.

The Sustainability and People & Culture teams monitor completion rates for training across the business for reporting purposes and to ensure accountability and continuous improvement in our approach to modern slavery risk management.

Building the capability of our suppliers

We recognise the importance of engaging with suppliers to support their understanding of our expectations and requirements related to modern slavery risk management.

Through the Singtel Group website, suppliers can access a free e-learning video about the Singtel Group Supplier Code of Conduct, which includes our expectations related to modern slavery risk management and key modern slavery red flags, such as excessive working hours and other issues that can give rise to modern slavery risks, such as inadequate accommodation for workers and fair wages.

Training completion rates

We continued to build our modern slavery awareness and capability:

9,372 individuals (including permanent employees and contractors) completed the Introduction to Modern Slavery e-learning module in 2026.



Grievance and remediation

We are committed to providing for, and cooperating in, remediation where we identify that we have caused or contributed to human rights harm, including modern slavery.

Our reporting channels provide an avenue for workers in our operations and supply chain who have a concern about modern slavery to safely and anonymously make a complaint.

We understand that these mechanisms can only be effective if they are trusted and accessible. We continued to promote the Optus Whistleblower Hotline and other methods for raising concerns over the reporting period.

We also assess our suppliers’ practices in this area through our social audits, which include criteria relating to reporting channels.



Our whistleblower process

- What it enables**

Reporting of unethical and inappropriate conduct or concerns, such as fraudulent, corrupt or illegal activity, including any complaints related to potential modern slavery practices. The Optus whistleblower process, including the externally operated hotline service, is operated in accordance with the Whistleblower Policy, which provides all whistleblowers with protection from detrimental conduct, such as reprisals and retaliation.
- Who can use it to make a report**

All Optus employees and company officers, partners and their employees, contractors and authorised representatives of suppliers and suppliers’ workers, people that used to be in one of these groups and family members of any person in one of these groups.
- How it operates and how complaints can be raised**

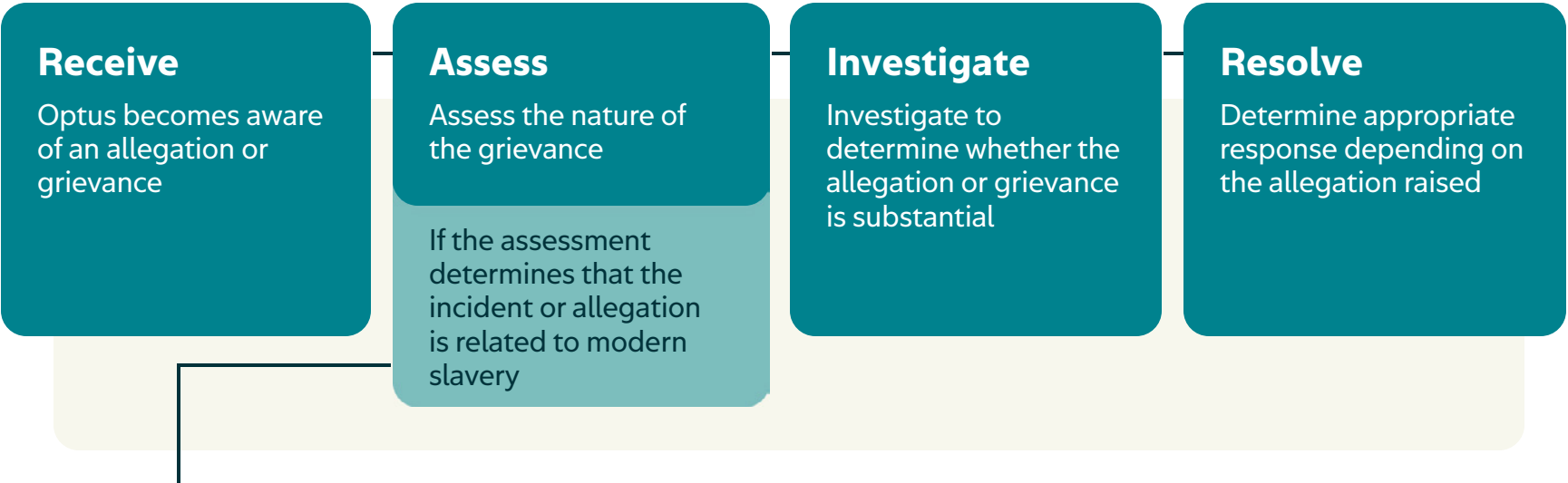
Optus’ whistleblower process provides multiple channels for complainants to lodge reports, such as via email, online portal, and phone. In addition, reports can be made directly to Eligible Recipients which includes designated members of the Optus senior leadership team, the designated Whistleblower Investigations Officer and Whistleblower Protection Officer for Optus, members of the Optus Internal Audit team, and certain external parties as required by the law in Australia concerning whistleblowing.
- Safeguards in place**

The Whistleblower Policy contains safeguards to protect the confidentiality of complaints and to protect complainants from detrimental conduct, such as retaliation. The Policy allows complaints to be reported anonymously, and confidential communication with a complainant is managed through a portal that protects anonymity.

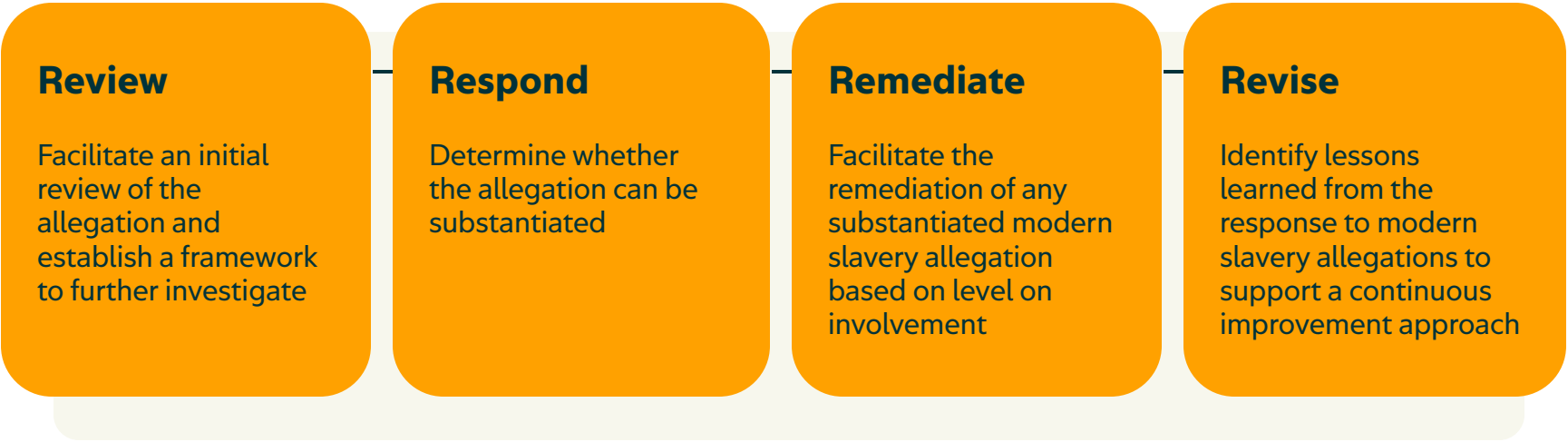
How we could become aware of a modern slavery incident or allegation

- 1. We identify possible modern slavery through our supplier due diligence process.
- 2. An Optus employee, contractor, casual worker, or third party (such as a supplier’s worker) makes a complaint about possible modern slavery through our whistleblower mechanism.
- 3. A supplier self reports possible moderns slavery to us relating to its own operations or those of a sub-supplier.
- 4. We are made aware of possible modern slavery by media, civil society, to other external stakeholders.
- 5. An Optus employee engaging with a supplier (such as a contracted service provider) identifies possible modern slavery.

Our modern slavery grievance process flow



Our modern slavery incident response plan



Core supporting Policies and Processes



Collaboration and stakeholder engagement

A collaborative approach is key to building and maintaining a strong approach to modern slavery risk management.

In 2026 we contributed to the development of collaborative, business-led responses to modern slavery.

Forum	How we engaged
UN Global Compact Network Australia (“UN GCNA”) Modern Slavery Community of Practice	Optus has been a signatory to the UN GCNA since 2007. As part of this commitment, we participate in the UN GCNA’s Modern Slavery Community of Practice quarterly meetings. This is a small, interactive forum with membership from a range of industry peers and other Australian businesses. The aim is to provide collaborative opportunities to manage modern slavery risks, gain insight into industry sector practices, challenges and learnings, and share and develop good practice responses.
The Groupe Speciale Mobile Association (“GSMA”)	The GSMA represents the interests of mobile operators worldwide, bringing together more than 750 operators and approximately 400 companies in the broader mobile ecosystem. As a global member led organisation, Optus (through the Singtel Group’s membership), has opportunities for collaboration on a range of topics, such as modern slavery and human rights, providing valuable insights and enabling members to work towards common goals.
Australian Retailers Association (“ARA”)	The Australian Retailers Association is Australia’s peak retail body, representing more than 120,000 retail shop fronts and online stores. As part of our membership with ARA, we participated in a consultation session, facilitated by the ARA and attended by retail industry peers, on the recommended amendments to the MSA.

Looking ahead

Over the next reporting period, we aim to prioritise the following actions:

Refresh our Modern Slavery Roadmap Refresh our existing roadmap to adapt to evolving challenges and ensure our modern slavery risk management strategies remain effective and relevant.	Engage our suppliers Review and refresh our Supplier Engagement Roadmap to enhance supplier engagement, identify any new risk areas, and develop targeted actions to address our modern slavery risks across the supply chain.	Assess supplier risks Roll out the enhanced supplier questionnaire in the tender process to enable procurement category managers to easily assess responses.	Embed the Optus Whistleblower Policy Following adoption of the Optus Whistleblower Policy by the Optus Board in August 2026, we are reviewing our processes for management of whistleblower complaints to ensure they remain consistent with good practice.
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Assessing the effectiveness of our actions

Measuring the effectiveness of our actions to assess and address modern slavery risks informs our continuous improvement

The review and assessment of our actions to identify and address our modern slavery risks in our operations and supply chain is an ongoing process.

An effective business response to modern slavery involves multiple elements, which for Optus includes:

- A meaningful understanding of potential or actual modern slavery risks across the business’ operations and supply chains;
- The capacity to address these risks through practical actions, such as meaningful supplier engagement and collaboration with stakeholders; and
- The development of processes to remediate or cooperate in the remediation of any modern slavery-related harm the business identifies it has caused or contributed to.

We currently assess the effectiveness of our response against a range of quantitative and qualitative criteria, as set out below.

Effectiveness criteria - qualitative	How this criterion helps us understand effectiveness
The successful implementation of action items under our Modern Slavery Action Plan.	Tracking how our Modern Slavery Action Plan is being implemented helps us to measure our progress and identify areas where further work may be required.
Feedback from our people, suppliers, business partners, community, or other stakeholders.	Internal and external feedback helps us to understand different perspectives on our modern slavery response and identify opportunities for continuous improvement.
Insights on modern slavery risk management good practice shared through the professional networks we participate in, such as the UN GCNA Modern Slavery Community of Practice that supports us to benchmark our processes.	Participation in collaborative forums helps us to continually improve and better understand how our response compares to key peers across the telecommunications sector and more broadly with the aim of adopting other best practice initiatives.
Effectiveness criteria - quantitative	How this criterion helps us understand effectiveness
The number of targeted people (role specific) who have completed our modern slavery e-learning module and feedback from staff who have completed other training sessions, including the e-learning module.	Tracking the number of staff who complete training assists us to understand the level of modern slavery awareness across our business and feedback tells us where there are opportunities to further tailor training to address key knowledge gaps.
The number of social audits completed as part of our audit program and the nonconformances identified and addressed.	Tracking the results from our social audits, which focus on compliance with ethical sourcing and labour standards, helps us to understand whether these audits are effective in identifying issues for our suppliers and providing a process for these issues to be addressed.
The number of modern slavery-related complaints reported to our Whistleblower Hotline (or other channels) and whether any cases were substantiated.	Tracking the number of modern slavery-related complaints received and whether any cases were substantiated helps us to assess whether our grievance mechanisms are able to identify and respond to modern slavery incidents or allegations and whether we are able to meaningfully investigate and address any complaints.



We also track our performance against these criteria through internal and external mechanisms.

Internally, we leverage the expertise in our Modern Slavery Working Group to monitor and seek internal feedback on the impact of our actions.

Externally, we welcome feedback from suppliers, business partners, expert advisors, community, and other stakeholders.

Consultation to develop our Modern Slavery Statement

Reporting entities (and other controlled entities) covered by this Statement are all supported by Optus company secretariat and legal divisions, who were consulted in developing this Statement.

The overall development of our Statement was led by the Optus Modern Slavery Working Group, which includes representatives from key functions across the Optus group who are responsible for modern slavery risk management, including Sustainability, Sustainable Procurement, Corporate Affairs & Marketing, Risk, Legal, Internal Audit, Global Contact Centres, Process and Operational Excellence, and People and Culture.

The contribution of the Modern Slavery Working Group members ensures that the Statement is an accurate reflection of the risk management activities of the reporting entities, and owned and controlled entities, undertaken in the reporting year.

Approval of Optus' Modern Slavery Statement

The Board of Directors of Singtel Optus Pty Limited approved this Statement on 29 September 2026 as the principal governing body, on behalf of itself and the other reporting entities covered by this Statement. It is signed by the Singtel Optus Pty Limited's Chief Executive Officer.



Stephen Rue

Chief Executive Officer

Appendix 1:

The reporting entities covered by Optus' Modern Slavery Statement

Singtel Optus Pty Limited (ABN 90 052 833 208): Head operating entity for the Optus group's provision of telecommunications services

Optus Networks Pty Limited (ABN 92 008 570 330): Provision of telecommunications services

Optus Mobile Pty Limited (ABN 65 054 365 696): Provision of mobile phone services

Optus Internet Pty Limited (ABN 14 083 164 532): Provision of services over hybrid fibre co-axial network and national broadband network

Optus Satellite Pty Limited (ABN 33 091 790 313): Provision of satellite services

Optus Wholesale Pty Limited (ABN 86 092 227 551): Provision of services to wholesale customers

Optus C1 Satellite Pty Limited (ABN 80 087 587 504): Provision of satellite services

Optus Vision Pty Limited (ABN 50 066 518 821): Provision of telecommunications services

Amaysim Mobile Pty Limited (ABN 82 645 692 093): Provision of telecommunications services

Yes OPTUS