Modern Slavery Act Statement 2026

Acknowledgement

We recognise and acknowledge the existing, original and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands, waterways and sky country across the Australian continent. We pay our respects to their Elders and Ancestors.

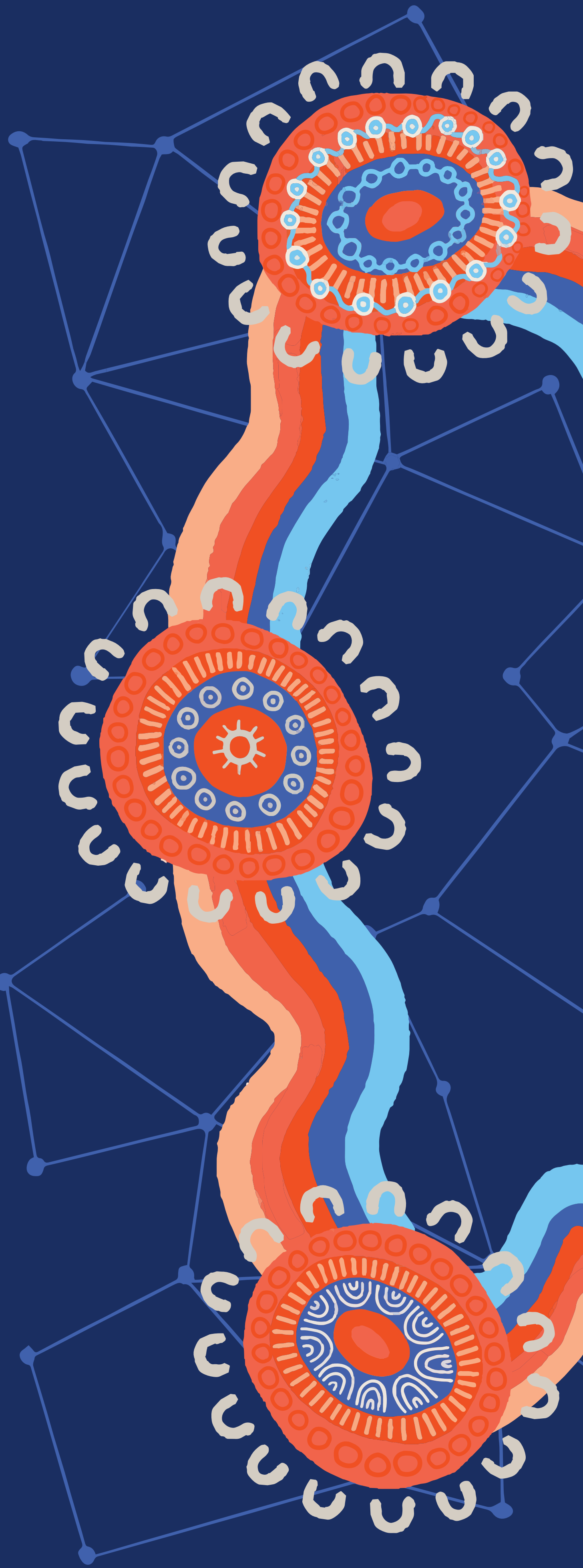
At Telstra, we are enriched by Aboriginal and Torres Strait Islander peoples' contribution to our organisation, and we commit to working together to build a prosperous and inclusive Australia.

About the artwork 'Connection'

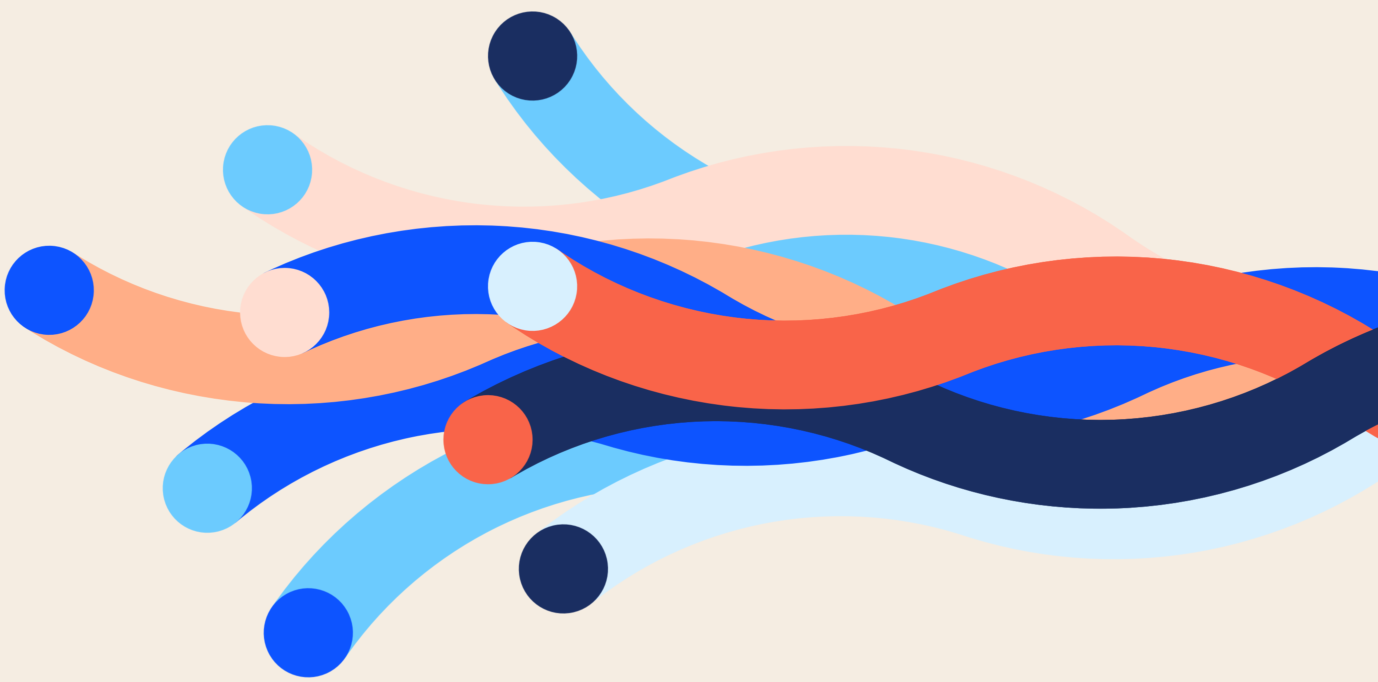
Created by Bobbi Lockyer, a passionate Aboriginal artist hailing from Kariyarra Country in Port Hedland. This artwork represents Telstra's commitment to its customers, community, and the power of connection. The artwork combines the hand painting storytelling and symbols of the oldest continuous culture in the world with the modern digital graphic design of the satellite sky.

Terms used

Throughout this statement, the terms Aboriginal and Torres Strait Islander and First Nations are used interchangeably to reference Australia's First Peoples.



Contents



Reporting entities and disclosure notes

The Telstra Group has prepared this statement to meet the requirements of the *Modern Slavery Act 2018* (Cth) (Australian Act) and *Modern Slavery Act 2015* (UK) (UK Act).[1]

This statement covers the Reporting Entities described in *Appendix 1* for the period ended 30 June 2026. These entities represent all Telstra Group controlled entities that meet the reporting entity criteria under the Australian Act or the UK Act, other than Versent Group and Versent. In FY26, we announced the sale of a 75 per cent stake in Versent Group and its subsidiaries, including Versent. Versent Group and Versent are not included in this statement as joint reporting entities for the purposes of section 14 of the Australian Act. However, in accordance with section 16 of the Australian Act, the information in this statement on the owned or controlled entities of the Reporting Entities includes Versent Group, Versent and their owned or controlled entities, including FY26 data and metrics.

The activities described in this statement generally apply across the fully integrated entities in the Telstra Group. Reporting Entities Telstra Health and Digicel Pacific Group, and certain owned or controlled entities in the Telstra Group, such as Fetch TV, are not fully integrated into Telstra operations. The activities of these entities in response to modern slavery risk generally differ to that of the remainder of the Telstra Group. For information on how Reporting Entities Telstra Health and Digicel Pacific Group respond to modern slavery risk, see the *Telstra Health* and *Digicel Pacific Group* sections of this statement.

Capitalised terms and key concepts are defined in the *Glossary* of this statement.

All disclosures in this statement are as of 30 June 2026, unless stated otherwise.

Forward-looking disclaimer

This document includes forward-looking statements which are provided as a general guide only. They reflect expectations which involve risks, uncertainties and other factors which may be beyond Telstra's control. Readers should not place undue reliance on the forward-looking statements. To the maximum extent permitted by law, Telstra gives no representation, warranty, or other assurance in connection with, and disclaims all responsibility for, the currency, accuracy, reliability and completeness of any forward-looking statements.

Responsible use of artificial intelligence

Some of this content was created with the support of artificial intelligence (AI). We used human judgement and our established governance and assurance processes to verify and confirm the content.

1. In previous years, we also reported under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (CA) (Canadian Act). We are not reporting under the Canadian Act for FY26 in reliance on the de minimis carve-out in the guidance to that Act.

CEO statement

Modern slavery is a grave abuse of human rights that affects millions of people around the world, and it is too often hidden within complex global supply chains. We are committed to acting responsibly and respecting human rights, and we see addressing modern slavery as a core part of this commitment.

Modern slavery risks are often most acute deep within our supply chains where we have limited visibility and less influence. That means we need to continually evolve our approach – moving beyond compliance towards more practical and innovative ways to identify risk, strengthen due diligence and support remediation processes in line with international standards. In FY26, this included incorporating feedback from modern slavery survivors, further uplifting and streamlining our supplier governance processes, and contributing to a joint effort with peers in the telecommunications sector to identify and support young people affected by child labour.

During the reporting period, Digicel Pacific Group identified serious labour rights concerns within its supply chain. This led to us supporting Digicel Pacific Group's efforts to work with the relevant supplier on uplifting the working conditions of the people affected, in line with the commitments in our Human Rights Policy and the United Nations Guiding Principles on Business and Human Rights (UNGPs). Addressing these issues is challenging and takes time, but we recognise our responsibility to continue working to improve conditions for workers in our supply chains.

We view the identification of serious labour rights risks and incidents as a critical part of a mature and effective modern slavery risk management program. Findings such as this reinforce the importance of continually strengthening our systems, listening to worker voices, and improving how we respond when concerns are raised.

We are committed to continuous improvement, transparency and learning. Meaningful progress is possible when issues are brought to light and addressed with seriousness and care.

We recognise the gravity of modern slavery and will continue to work diligently to identify, address and mitigate modern slavery risks in our operations and supply chains.

FY26 highlights

Launched a dedicated human rights resource for our teams to further embed human rights considerations into everyday decision-making	*Educating our teams*	Page 10
Supported adoption of our supplier governance technology solution to further streamline our supplier governance processes	*Rolling out improvements to supplier governance across Telstra*	Page 19
Incorporated advice from survivors into guidance for our teams on how to investigate and remediate a labour rights incident in our supply chains	*Labour rights investigations and remediation protocol*	Page 20

Annual disclosure

In FY26, we did not identify any confirmed instances of modern slavery in our operations or supply chains. However, an audit of a Digicel Pacific Group supplier found serious labour rights issues were present that, when assessed against the International Labour Organization (ILO)'s forced labour indicators, presented red flags for modern slavery. For more information, see the *Protecting workers in the security services sector* section of this statement.

We also identified other labour practices that concerned us.[2] As part of our commitment to transparency, we have chosen to report them in this statement.

This statement covers each of the Reporting Entities under:

- section 14 of the Australian Act
- section 54(1) of the UK Act.

It is a joint statement under the Australian Act. All disclosures in this statement are as of 30 June 2026, unless stated otherwise.

Australian Act

This statement was approved on behalf of the Telstra Group by the Board of Telstra Group Limited under section 14(2)(d)(ii) of the Australian Act on 10 August 2026.

Vicki Brady

CEO and Managing Director of Telstra Group Limited

UK Act

This statement was approved on behalf of Telstra UK Limited by the Board of Telstra UK Limited under section 54(6)(a) of the UK Act on 17 August 2026.

Margaret Chan

Director of Telstra UK Limited

26 August 2026

2. For more information, including on our approach to remediation, see the *Supplier Governance Framework*, *Telstra International*, *Deep dive on our batteries supply chains* and *Improving labour practices in our IT services supply chains* sections of this statement.

Who we are[3]

Our structure

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

As of 30 June 2026, the Telstra Group has a direct or indirect interest in over 190 controlled entities across approximately 30 countries.

In FY26, we disposed of 100 per cent of our interest in Alliance Automation Pty Ltd, Telstra Health UK (Holdings) Limited, MT Data Holdings Pty Ltd and their controlled entities. We also ceased our role as sole member of Heritage Telecommunications Ltd, relinquishing all membership interests.[4]

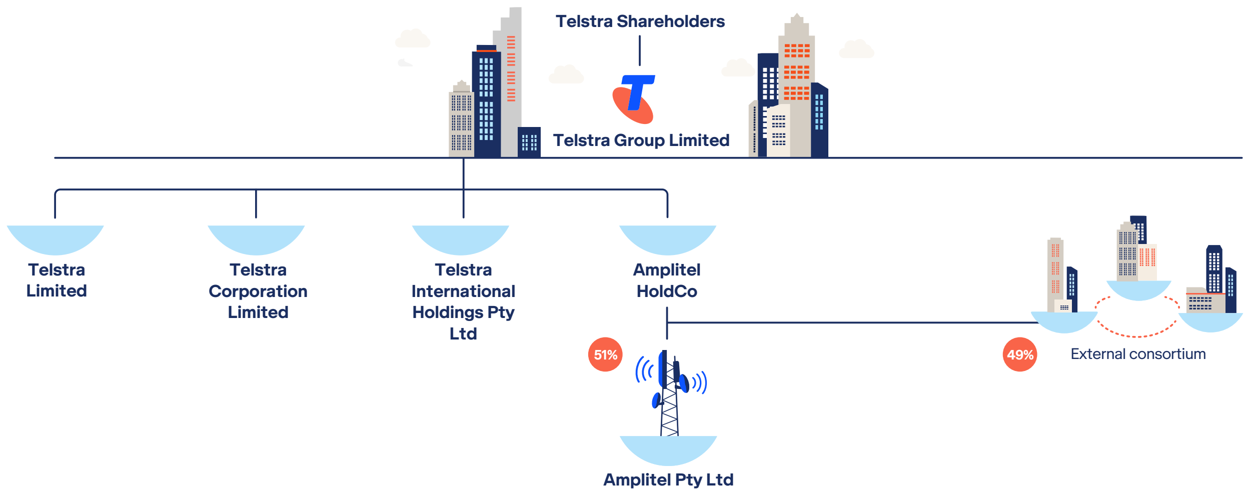
We have around 260 retail stores in Australia. We provide around 26 million retail mobile services and 3.1 million consumer and small business bundle and data services. We connect to points of presence in close to 200 countries and territories around the world.

Our operations

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

Details about the specific operations of each Reporting Entity are set out in *Appendix 1* of this statement.

For more information on our business, see our **2026 Annual Report** on our website.



3. Specific information on the operations, workforce and supply chains of reporting entities Telstra Health and Digicel Pacific Group is set out in the *Telstra Health* and *Digicel Pacific Group* sections of this statement. For more information, see the *Reporting entities and disclosure notes* section of this statement.
4. For a complete list of the controlled entities in the Telstra Group as of 30 June 2026, see the 'Consolidated Entity Disclosure Statement' in our **2026 Annual Report** on our *website*

Our workforce[5]

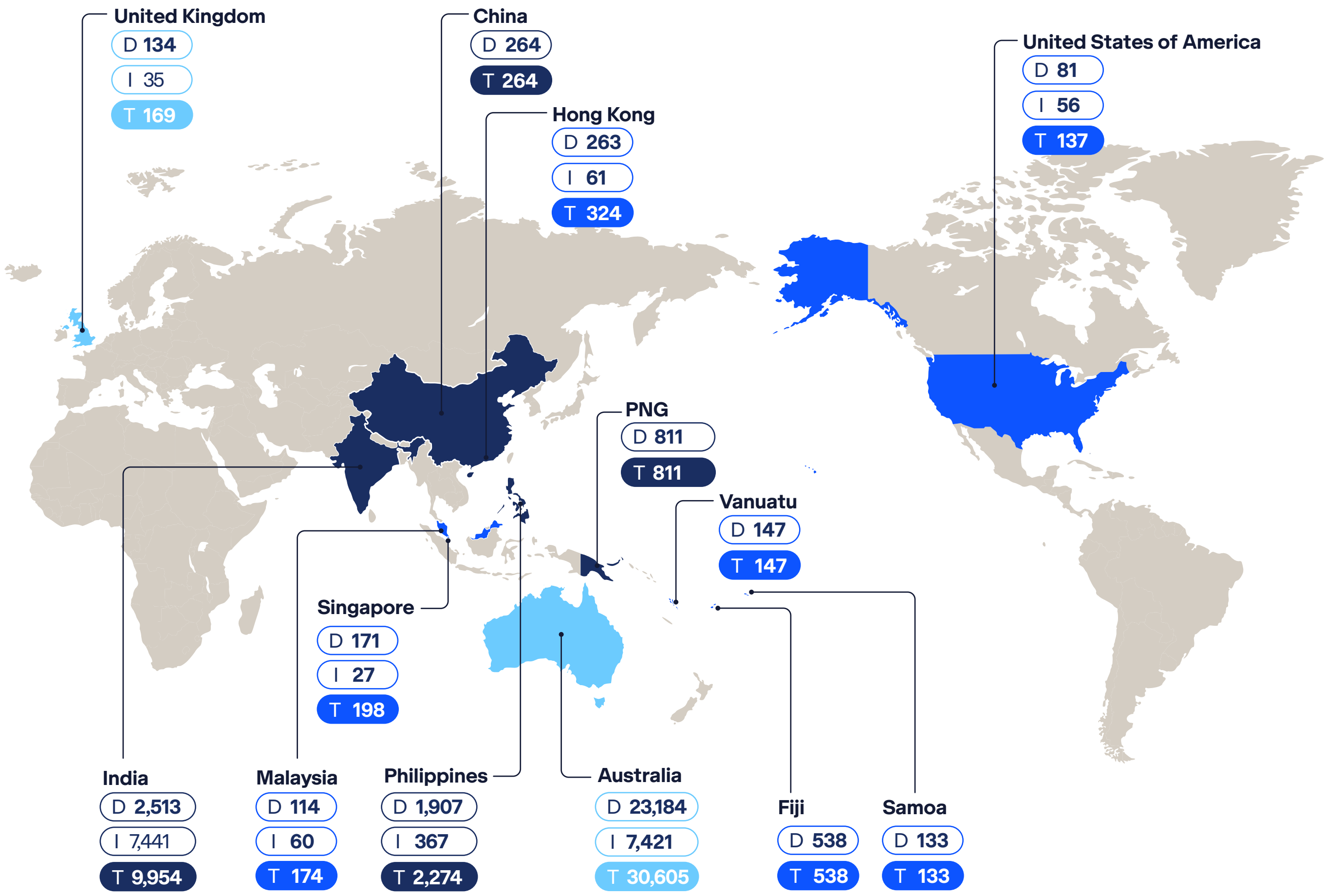
Telstra relies on a highly diverse workforce with a wide range of skills. Our workforce includes direct employees and workers engaged through industry partners.

Most of our indirect workforce supports customer-facing and back-office processing services. Our main locations for indirect workers are Australia, India and the Philippines.

	Direct workforce	Indirect workforce
Globally	**30,479**	**15,615**
Outside Australia	**7,295** (23.9% of global direct workforce)	**8,194** (52.5% of global indirect workforce)
Locations	**24 countries**	**32 countries**

Our global labour rights risk profile for key locations[6]

Telstra's direct and indirect workforce exposure to labour rights risks by location (with total workforce more than 100 workers).[7]



D Direct workforce
I Indirect workforce
T Total

High risk
Medium risk
Low risk
Less than 100 workers / no data / Telstra does not have presence

5. All people data in this statement is expressed as headcount, not full-time equivalents (FTE), is as of 30 June 2026 and is based on the data recorded in Telstra's people management system.
6. For FY26, the workforce data includes all locations with total headcount above 100. In previous years, we did not report workforce data if the direct workforce or indirect workforce headcount in that location was 100 or less, even if the total headcount was above 100.
7. See 'Risk rating' in the *Glossary*

Our supply chains[8]

In FY26

Telstra engaged directly with more than 5,400 suppliers across 84 countries

Approximately 76 per cent of our total spend was with our top 100 suppliers

Our supply chains are large, complex and constantly evolving. We work with our direct suppliers (tier 1) for a wide range of products and services. These suppliers, in turn, rely on their own suppliers (tier 2, 3, 4 suppliers and beyond). As our supply chains extend across these deeper tiers, maintaining full visibility becomes increasingly difficult.

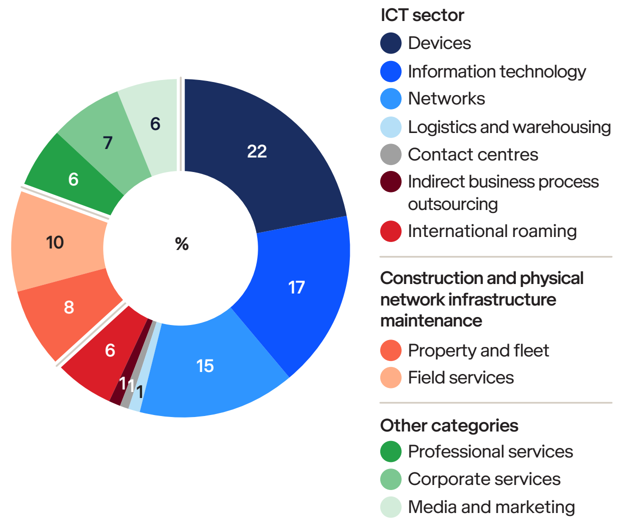
Most of our supplier spend is on information and communications technology (ICT) and physical network infrastructure, including electronics and network components. We do not manufacture our own hardware, devices or equipment. Instead, we procure finished goods from large multinational companies and work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

We mainly procure services from Australia, India and the United States of America.

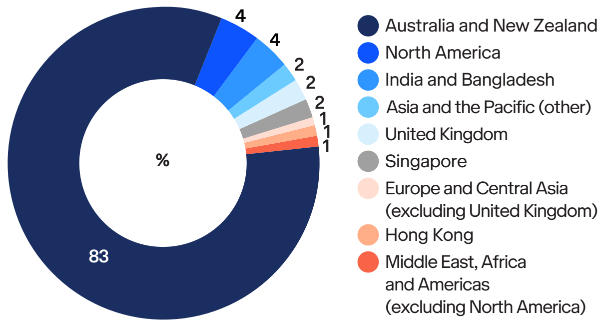
We mainly purchase goods in Australia. These goods are manufactured across the world, including in China, Vietnam and India.

Approximately 88 per cent of what we spend directly is with suppliers based in low-risk countries.[9] These suppliers may have headquarters or manufacture products in other countries. We look at both the risk posed by direct suppliers and by suppliers further down our supply chains, including their location.

% of Telstra direct supplier spend by category[10]



% of Telstra direct supplier spend by country[11]



8. These figures capture Telstra Group entities who use Telstra's centralised procurement processes. These figures do not include Telstra's owned or controlled entities who do not use Telstra's centralised procurement processes. For examples, see the *How we consult within our group* section of this statement.
9. See 'Risk rating' in the *Glossary*
10. See the *Glossary* for more information on these categories.
11. Country location is based on the supplier's registered address in our vendor management system. This may not reflect the country where the product or service is sourced from.

Our approach[12]

Modern slavery governance

We manage modern slavery risks in our direct workforce and supply chains through our risk management and compliance framework. This framework sets out our obligations, including those relating to wages, benefits and a healthy, safe and sanitary workplace. It also governs how we manage our modern slavery reporting.

Telstra's Risk and Sustainability Committee makes recommendations to the Board on our modern slavery disclosures.

Labour rights risk management

'Labour rights in the supply chain' is a salient human rights issue for Telstra.[13] This issue covers the topic of labour exploitation broadly, including modern slavery.

In FY26, we strengthened how we manage our salient human rights issues. We started integrating these risks into Telstra's enterprise risk management framework. This framework provides a structured approach to apply a consistent risk management process across the company. As the first step, we have assessed Telstra's current risk exposure and mapped existing controls already in place. In FY27, we plan to identify gaps where new or enhanced controls are required.

For more information on our risk management and compliance framework, see our **2026 Corporate Governance Statement** and our **2026 Annual Report** on our website.

Educating our teams

To further embed human rights considerations into everyday decision-making, we launched a dedicated human rights resource on our intranet in FY26. It explains our commitments and obligations, how salient human rights risks may arise in different roles and what to do if our teams identify a potential labour rights issue in our supply chains.

Our policies

Our Group Policies support our commitment to respect human rights and manage modern slavery and labour rights risk in our operations and supply chains.

Under our Group Policy Governance Framework and Group Governance Operating Model, Telstra Group entities must either adopt or align with the Group Policies and supporting frameworks or seek an exemption. We continue to work towards full adoption or alignment for all Telstra Group entities.

12. Specific information on the approach of reporting entities Telstra Health and Digicel Pacific Group is set out in the *Telstra Health* and *Digicel Pacific Group* sections of this statement. For more information, see the *Reporting entities and disclosure notes* section of this statement.
13. For more information on our full list of salient human rights issues and how we assess them, see our **2026 Bigger Picture Report** on our website

Policy	What it covers	Who it covers	How we implement it
Ethics, human rights and grievance mechanisms			
Code of Conduct (Code)	Our global approach to ethical and compliance issues, including modern slavery, and how to raise concerns	All directors, employees and contractors in the Telstra Group unless an exemption has been granted	• Covered in our Business Essentials Training • Published on Telstra's website and intranet • Reviewed annually • Supported by Group Policies • Code breaches are investigated, with specialist support for serious issues • Data on material instances of misconduct is reported to the CEO Leadership Team and Telstra's People and Remuneration Committee twice a year.
Human Rights Policy	Our commitment to respect and support human rights, including labour rights, and how to raise concerns	All employees, contractors, notified individuals, suppliers, business partners and other third parties	• Covered in our Business Essentials Training • Published on Telstra's website and intranet • Reviewed annually • Supported by a 'plain English' Human Rights Policy guidance document • Approved by the Telstra Group CEO.
Whistleblowing Policy	Confidential and anonymous process that protects people who speak up about illegal, unethical or improper conduct or improper state of affairs at Telstra	All directors, current and former employees in the Telstra Group, their relatives and dependants, suppliers and other notified persons	• Covered in our Business Essentials Training • Published on Telstra's website and intranet • Reviewed annually • Supported by our Whistleblowing Service • Referenced, with links to our Whistleblowing Service, in other relevant Telstra policies.
How we protect our workers			
Discrimination, Bullying, Harassment and Victimisation Policy	Our commitment to providing a safe, respectful and inclusive workplace	All employees and contractors of the Telstra Group[14] and other notified persons	• Covered in our mandatory Discrimination, Bullying, Harassment and Victimisation Training • Published on Telstra's website and intranet • Reviewed annually • All reported concerns are investigated, with specialist support provided • Supported by a guidance document.
Diversity, Equity and Inclusion Policy	Our commitment to setting, assessing and reviewing our diversity, equity and inclusion (DEI) objectives and progress, and how we create a safe, respectful and inclusive workplace for all	All directors, employees and contractors in the Telstra Group unless an exemption has been granted	• Published on Telstra's website and intranet • Reviewed annually • Supported by our Global DEI Strategy, DEI Council, five employee representation groups and action plans related to Culture, Ethnicity and Race, Accessibility, First Nations, Gender Equity and LGBTQ+ • Dedicated learning pathways available for DEI and for individual diversity dimensions.
Health, Safety and Wellbeing Policy	Our commitment to meeting applicable health and safety laws at minimum, and how we keep our people, partners, customers and the community safe and well	All employees and contractors in the Telstra Group, and other notified persons, unless an exemption has been granted	• Covered in our Business Essentials Training and supported by specific safety training for high-risk activities performed by some of our frontline workforce • Published on Telstra's website and intranet • Health and safety performance is regularly reported to the CEO Leadership Team, Telstra's People and Remuneration Committee and the Board • Reviewed annually.
How we govern risks in our supply chains			
Dealing with Suppliers and Other Third Parties Policy	How we engage with suppliers or third-party agents and how to report concerns or breaches	All employees and contractors of the Telstra Group and any person notified	• Covered in our Procurement Principles Training and Supplier Governance Framework Training • Published on Telstra's intranet • Reviewed every second year • Supported by our Supplier Governance Framework.
Supplier Code of Conduct	Our minimum standards of behaviour for our suppliers and their supply chains, aligned with the principles of the UN Global Compact, industry guidelines, ILO Standards and legislation	Our suppliers	• Covered in our Supplier Governance Framework Training • Published on Telstra's website • Reviewed annually • Supported by our supplier due diligence process, audit program, Supplier Governance Framework and supplier guidance documents on our human rights requirements and effective grievance mechanisms • Part of our standard purchasing terms • Provided to most suppliers when we contract with them and when updated.

14. Except entities within the United States of America.

Our training

We provide mandatory training to help our people understand and identify modern slavery risks in our operations and supply chains.

Training	Description	FY26 completion rate (% of enrolled target audience)
Business Essentials Training	• Mandatory for all employees and directors and most of our contractors, consultants and partners • Required on starting at Telstra and then annually • Covers key obligations under our Code and Group Policies including Telstra's Human Rights Policy • Includes a module covering human rights and modern slavery risks relevant to Telstra.	97.7%
Supplier Governance Framework Training	• Mandatory for all staff who manage contracts or supplier relationships, our Procurement team and Risk team • Raises awareness of our supplier management policy requirements, including our Supplier Code of Conduct • Explains staff responsibilities and resources available to manage supplier risks, including labour practices.	99.6%
Addressing Modern Slavery Training	• Mandatory for our procurement team and those that make labour hire decisions or deal with high-risk areas • Helps our people understand how to identify and report potential modern slavery • We ask targeted roles to complete this training on starting at Telstra • Refresher training required for those targeted roles every two years.	95%
Procurement Principles Training	• Mandatory for all procurement specialists • Helps our people understand their responsibilities to manage procurement risks and support our social commitments • Guides our people on how to comply with our Dealing with Suppliers and Other Third Parties Policy.	100%

Grievance mechanisms

We seek to ensure our people know how to raise a concern through a range of channels. We foster a culture where our people are encouraged to speak up and raise concerns with confidence. This helps us identify, investigate and remediate issues in line with our Human Rights Policy and the UNGPs.

When we receive reports relating to modern slavery or labour rights issues, we investigate them in consultation with internal subject matter experts. We seek external advice where appropriate.

Internal procedures

Employees can raise concerns with their manager or via our 'AskUs' tool on our intranet. Subject matter experts and operational leaders assess reports with support from the Chief Risk Officer where needed. We record concerns securely, and where possible, keep employees informed of outcomes and what we are going to do differently.

Whistleblowing

Our Whistleblowing Policy is supported by a confidential process that provides appropriate protections for eligible persons to report their concerns; a whistleblowing service where people can lodge a report anonymously; and professional investigators and case managers who investigate eligible reports. Telstra's Whistleblowing Committee, which is chaired by the Group Company Secretary, receives whistleblowing disclosures and oversees investigations and any follow-up actions required. The Whistleblowing Committee reports to Telstra's People and Remuneration Committee.

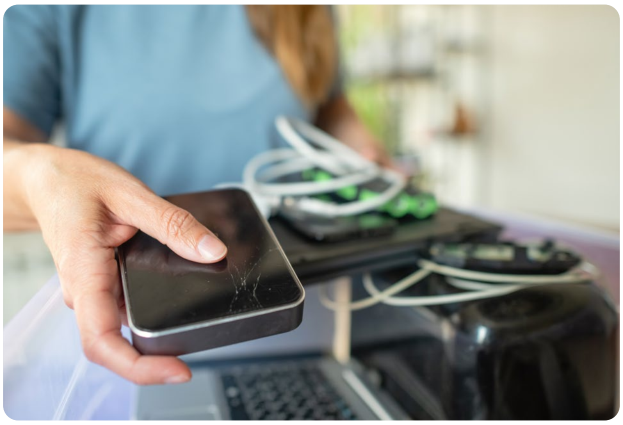
In FY26, we received 117 eligible whistleblowing reports. Of these, allegations in 49 reports were substantiated in whole or in part. None substantiated an instance of modern slavery.

For more information on our whistleblowing process, see our **2026 Bigger Picture Report** on our website.

To report a matter, please visit Telstra's Whistleblowing Service.

Industry cooperation on combatting modern slavery

We are members of organisations that work to improve modern slavery risk management. In FY26, our memberships included the Joint Alliance for Corporate Social Responsibility (JAC), the GSM Association and the UN Global Compact Network Australia Modern Slavery Community of Practice.



Taking a collaborative, multi-pronged approach

Modern slavery is complex, and no single organisation can address it alone. While we work to manage risks in our own supply chains, we do not always have complete visibility or influence over activities that occur in deeper tiers. Collaboration across our sector and with specialist partners is therefore critical to preventing and mitigating modern slavery risks.

In FY26, in a joint effort with other corporates from the telecommunications sector, we partnered with Save the Children Switzerland and The Centre for Child Rights and Business. This partnership involved a three-year commitment to support children and youth working in artisanal and small-scale cobalt mining (ASM) in the Democratic Republic of the Congo (DRC) through the Child Rights Action Hub DRC. In identified cases of child labour, affected children are referred to the Child Rights Action Hub DRC and receive monthly stipends for their living expenses, school fees, health checks and psychological support. The program aims to ensure that the affected children don't engage in child labour again. Participation allows us to directly contribute to modern slavery remediation processes in high-risk parts of our supply chains.

Cobalt is a critical mineral used in lithium-ion batteries found in many electronic devices, including products that Telstra procures. We do not always have full visibility or influence over the origins of this cobalt. More than half of the world's cobalt is mined in the DRC, with a significant portion of exports coming from ASM communities.[15] Due to the persistent poverty and a lack of alternatives such as quality education, it is estimated that one in six children in DRC ASM communities are engaged in mining work.[16] By investing in communities where child labour is prevalent, we aim to reduce the causes of modern slavery and therefore reduce the likelihood it will occur in our supply chains.

This program allows us to directly support effective, context-specific remediation processes in our supply chains, even where we are several tiers removed from where the risks and impacts occur.

As of 30 June 2026, 24 children are being supported by the remediation program, with 22 in school and two in vocational training.[17]

15. According to Amnesty International
16. Information provided by Save the Children Switzerland and The Centre for Child Rights and Business.
17. The Child Rights Action Hub DRC provides this metric. These results reflect the collective impact of all participating companies from the telecommunications sector and cannot be attributed to any single company or proportionally to individual financial contributions. By reporting on these shared results, we seek to demonstrate our contribution to this collaborative effort to eliminate child labour from supply chains, while acknowledging that the outcomes are the result of joint action.

Our modern slavery risks[18]

In our operations

This workforce is sometimes located in higher risk jurisdictions and can include vulnerable populations. The business model is higher-risk as we do not directly employ the workers.

In our supply chain

Risk factors include:

- Industries associated with known child labour concerns, labour rights risks or state-imposed forced labour risks
- Industries subject to increased supply chain pressure caused by geopolitical events or increasing demand
- Industries that frequently use recruiters or have a high level of subcontracting.

Workers are sometimes located in higher-risk jurisdictions or include populations such as migrant workers, temporary labour or low-skill labour.

Some products include higher-risk components produced by lower-tier suppliers, where Telstra has less visibility.

18. This is an overview only. The specific modern slavery risks vary depending on the relevant product, service or project. Specific information on the modern slavery risks of reporting entities Telstra Health and Digicel Pacific Group is set out in the *Telstra Health* and *Digicel Pacific Group* sections of this statement. For more information, see the *Reporting entities and disclosure notes* section of this statement.
19. For example, employees of our indirect delivery partners.
20. For example, ICT devices and accessories.
21. For example, energy metering devices.
22. Including electronic goods containing lithium-ion batteries and hybrid and electric vehicles.

Our overall approach

We assess that Telstra is most likely to be **directly linked** to modern slavery impacts through our business relationships.[23] We recognise it is possible we might **cause** or **contribute to** modern slavery if the risk management controls outlined in this statement are not effective.

How we assess modern slavery risk

We update our modern slavery risk assessment regularly through periodic modern slavery risk reviews to capture changes to our operations and supply chains. The risk reviews consider material developments in our operations, supply chains or geopolitical environment.

These risk assessments focus on four key modern slavery risk factors aligned with the UNGPs:

- Country/region
- Category/sector
- Vulnerable populations
- Business model[24]

We use diverse inputs to monitor, prioritise and address key risks effectively:

- Learnings from supplier due diligence processes, screening tools and grievance and issues tracking
- Active engagement in human rights forums
- Feedback from external stakeholders
- Review by internal subject matter experts

Continuous assessment of our human rights risks

In FY25, we identified new external information sources to enhance our supplier monitoring program. This year, we used these sources to analyse and identify potential new or emerging human rights risk areas in our supply chains. While we did not identify any new areas, we did find alerts related to suppliers that we had not identified in previous years. These insights will inform future audits and worker voice surveys.

Changes since FY25

While our areas of modern slavery risk remain similar to last year, we made three notable changes in FY26:

- We removed carbon credits as a modern slavery risk as we did not procure any in FY26
- We identified two new areas of modern slavery risk in our supply chains:
  - AI software, due to the reported labour rights concerns relating to workers who label the datasets used for AI model training
  - Fuel, acknowledging that geopolitical conflict in the Middle East has heightened the inherent modern slavery risk of fuel supply chains. Conflict conditions give rise to greater modern slavery risks. Heightened demand for fuel can lead to downward pressure on labour conditions that affect both conflict-affected and alternative oil-exporting jurisdictions. Telstra procures fuel from service stations or indirectly via our maintenance services providers. We therefore have limited visibility or influence over the source of the fuel we use.

23. Assessed according to the UNGPs' continuum of involvement under Guiding Principle 13 of the UNGPs.
24. To assess risk, we consider whether Telstra has visibility or control over workers' conditions or whether higher-risk products or services may be present in lower tiers of Telstra's supply chains where we may not have full visibility.

How we address our modern slavery risks[25]

In our operations

Looking after our employees

Telstra's global employment framework

Covers all Telstra Group direct employees

Compliance with laws

- Our payroll systems and compliance controls support us to pay employees correctly and on time
- We regularly audit our payroll arrangements to check ongoing compliance
- We periodically review the labour laws in our locations to check we meet requirements and remedy any gaps

Collective bargaining and consultation

- We consult with our people before we implement significant changes
- Our people are free to form or join a trade union, bargain collectively and engage in trade union activities in line with local laws
- In Australia, 94% of our direct workforce is covered by our enterprise agreements

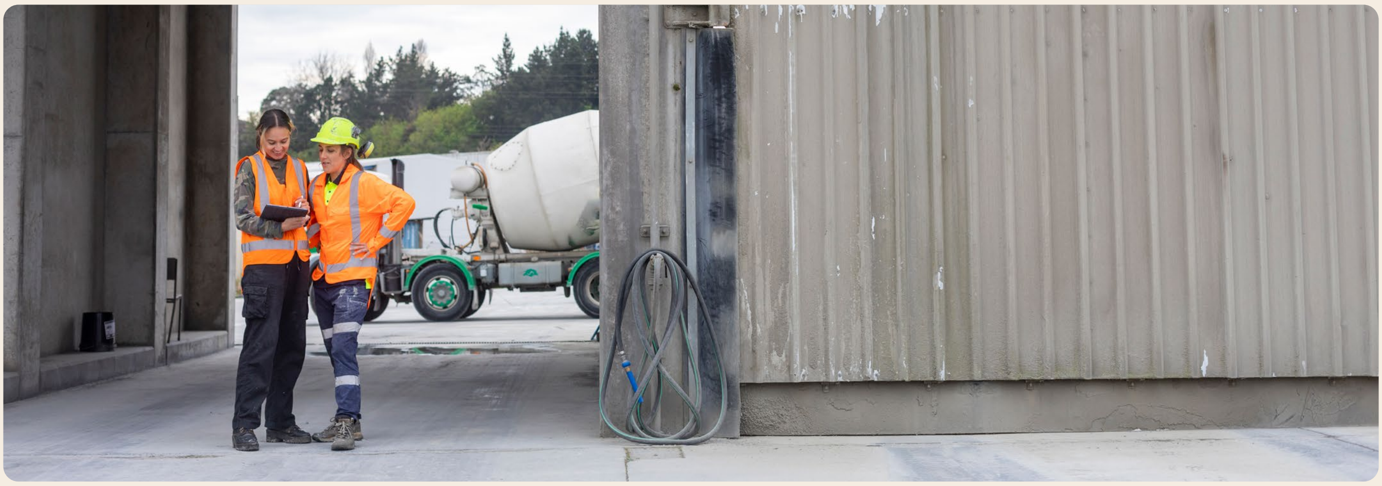
Treating our people well

- Our employment conditions and processes generally go beyond local legal requirements. This helps us respect and support the human rights of employees and provide a safe, fair and respectful working environment
- Under our enterprise agreements, our people can refuse unreasonable overtime requests

Our Main Employing Entities use an online recruitment management system to support us to follow our policies and processes. This includes generating contracts that meet our standards and confirming the person meets minimum employment age.

For more information on how we respect and support our people, including our approach to health, safety and wellbeing, see our **2026 Bigger Picture Report** on our website.

25. Specific information on the modern slavery risk response of reporting entities Telstra Health and Digicel Pacific Group is set out in the *Telstra Health* and *Digicel Pacific Group* sections of this statement. For more information, see the *Reporting entities and disclosure notes* section of this statement.



In our supply chains

Our processes to manage supply chain risk

Grievance mechanisms

- Whistleblowing Service
- Supplier grievance mechanisms
- Supplier self-reporting portal

Telstra Group Code of Conduct

Telstra Group Policies

Risk management framework

Supplier Code of Conduct

Supplier Governance Framework

Supplier selection

- Supplier risk assessment against Supplier Risk Categories
- Supplier due diligence

Standard contracts

Contractual obligations to comply with our modern slavery and human rights requirements

Monitoring

Management and ongoing review of supplier

Sustainability audit program

- Identification of higher-risk suppliers
- Site audits and worker voice surveys
- Corrective action plans
- Verification and closure of corrective actions

Governance and reporting

Supplier Risk Categories

Strategic
- Markets
- Stakeholder engagement

Operational
- Business resilience
- Supplier performance
- Fraud
- Environmental
- Sustainability

Technology
- Data & AI
- Network & information technology
- Cybersecurity

Compliance
- Legislative & regulatory
- Trade compliance
- Privacy

Financial
- Financial strategy
- Supplier/partner financial stability

People and conduct
- Safety, security & wellbeing
- People management
- Culture & conduct

External
- External environment
- Crisis, threats & hazards

Supplier Governance Framework

The Supplier Governance Framework supports our centralised procurement process. This process is used by most Telstra-controlled entities.[26]

Before we engage a supplier

Risk assessment	• We assess the inherent risks associated with a supplier engagement based on the Supplier Risk Categories.
Know your supplier (KYS)	• When entering new contracts, we require suppliers to complete our supplier due diligence questionnaire, upload and maintain information in our risk management systems and provide evidence of relevant accreditations • We periodically update the questionnaires to incorporate supplier feedback, respond to regulatory change and address emerging risks and issues • **79% of domestically-contracted suppliers have completed KYS onboarding.** In FY26, we started onboarding internationally-contracted suppliers through KYS.

When we engage a supplier

Contractual obligations	• We use our standard Telstra Supply Agreement for most suppliers • This agreement requires suppliers to comply with our Supplier Code of Conduct and modern slavery laws, maintain appropriate policies and processes to manage their supply chains and provide evidence of compliance when requested • We consider a supplier's ability to meet our Supplier Code of Conduct in our procurement decisions • We may include additional social, environmental or ethical requirements based on the supplier's risk profile • We can terminate an agreement if a supplier breaches these requirements • Suppliers must self-report breaches through our dedicated online portal.

Through the life of the relationship

Management and ongoing review of supplier	• We actively monitor contracted suppliers by reviewing publicly available information • High-risk alerts are reviewed by relevant internal subject matter experts • Where allegations of unacceptable labour practices arise, we work constructively with the supplier to understand and rectify the issue • Our engagement aims to improve conditions for workers and support better outcomes for communities and the environment • Our internal guidance explains how teams should investigate and respond to labour rights concerns, including remediation processes aligned with the UNGPs • If the supplier is higher risk or we are not satisfied with their response, we consider further due diligence • Where a supplier is unwilling to cooperate, despite repeated engagement, we may terminate the relationship or switch to an alternate supplier • **In FY26, we identified nine active suppliers with high-risk sustainability alerts.[27] This included labour practices alerts for four suppliers and no modern slavery alerts.**
Sustainability audit program	• We identify suppliers for further engagement, worker voice initiatives or site audits, based on risks identified through: **Media reports** / **Feedback from our team or external stakeholders, such as investors or modern slavery industry groups** / **Supplier self-reports** / **Whistleblowing reports** / **KYS** • We may require suppliers to undertake additional due diligence, including worker voice surveys or site audits, and we review the findings • We work with suppliers to develop remediation plans with agreed timeframes and verify the completion of the corrective actions.

26. The procurement process adopted by a controlled entity will depend on the level of Telstra's ownership, the relevant entity's circumstances, the nature of its operations and its jurisdiction. For example, Telstra Health, Digicel Pacific Group and Fetch TV do not use the Telstra Group procurement function or centralised procurement processes.
27. Sustainability issues relate to health and safety, labour practices, environmental practices, bribery and corruption and modern slavery.

Rolling out improvements to supplier governance across Telstra

In FY25, we implemented a new technology solution to strengthen our supplier governance processes through improved risk visibility, accountability, data integration and actionable insights. This year, we focused on supporting adoption across the organisation. We delivered information sessions in formats tailored to business needs and provided one-on-one coaching where appropriate. We also reviewed user feedback weekly and prioritised actions through an improvement backlog.

Our risk mitigants for our decarbonisation activities

Decarbonising our business and supply chain is essential to long-term sustainability and supports Australia's energy transition. We are committed to achieving net zero emissions by 2050, including scope 1, 2 and 3 greenhouse gas emissions. Our actions include investing in decommissioning legacy equipment, investing in energy efficiency and procuring electric and hybrid vehicles and solar panels.[28] In addition, we invest in renewable energy projects that support grid decarbonisation.

The rapid expansion of the renewable energy sector, as part of the energy transition, has increased modern slavery risks in global supply chains. Many components are produced in high-risk jurisdictions and rely on vulnerable workforces.

These include regions with known risks such as:

- child labour
- state-imposed forced labour
- targeted exploitation of minority groups including indigenous groups.

We consider these areas high-risk categories within our supply chain and prioritise them accordingly. We also recognise the need to manage our role in the transition to a low-carbon economy in a way that respects and protects labour rights across our operations and value chain.

Renewable energy projects	• We review relevant supplier policies and ask specific questions about modern slavery risk management during the request-for-proposal stage • We do not proceed with the project if we assess that a supplier is not adequately managing modern slavery risks • Our Power Purchase Agreements require compliance with the Supplier Code of Conduct and relevant Group Policies • Our contract management team regularly monitors ethical business risks through the course of the contract.
Solar panels	• We cross-reference potential suppliers against previous JAC audits and any known allegations of worker exploitation • We engage tier 1 suppliers early and seek detailed information about how they manage modern slavery risks • Our teams follow internal guidance on raising modern slavery concerns and identifying known risks.
Batteries[29]	We recognise batteries as a higher-risk category within our supply chains. In FY26, we conducted further due diligence on our battery suppliers through our sustainability audit program. For more information, see the *Deep dive on our battery supply chains* section of this statement.

For more information on our decarbonisation risks and opportunities, see the 'Sustainability Report - Climate Statements for FY26' section of our **2026 Annual Report** on our website.

28. For more information on our climate ambitions and the steps we are taking towards our goals, see our **2026 Bigger Picture Report** on our website
29. Including electronic goods containing lithium-ion batteries and hybrid and electric vehicles.

Supplier risk management in FY26

Labour rights investigations and remediation protocol

We recognise the importance of listening to survivors of modern slavery. In FY25, we published a protocol to guide teams on how to investigate, respond to and remediate labour rights concerns in our supply chain. We sought feedback on this protocol from survivors and in FY26 we updated the document in response. We also incorporated this feedback into a new guidance document, which includes advice on taking a trauma-informed approach when responding to incidents among other topics.

Our FY26 worker voice surveys and audits

In FY26, we conducted worker voice surveys with two suppliers. The surveys had a 60 per cent overall response rate.

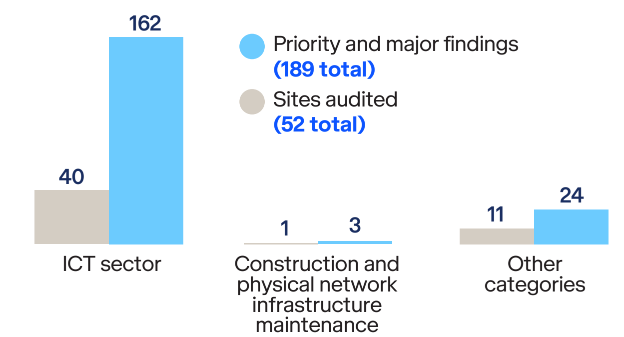
Category	Location	Number of sites	Findings	Supplier response
Professional services	Australia	1	• Potential harassment and abusive behaviour • Workplace inequality • Dissatisfaction with wages.	• Investigated but unable to validate the alleged harassment and abusive behaviour • Additional training on the supplier's Code of Conduct, Grievance Handling Policy and Anti-Discrimination and Sexual Harassment Policy • Consultation sessions to encourage communication and incident reporting • Increased wage transparency.
	India	6		
Property	Australia	4	• Potential harassment and abusive behaviour • Dissatisfaction with wages.	• Recirculation of company policy highlighting reporting mechanisms • Investigated and responded to reported harassment and abusive behaviour • Increased wage transparency and employment progression opportunities • Implemented company-wide Employee Assistance Program.

In FY26, **52 sites across 23 suppliers were audited** using the JAC guidelines. Telstra led 12 audits and JAC peers led the remaining 40 audits[30]

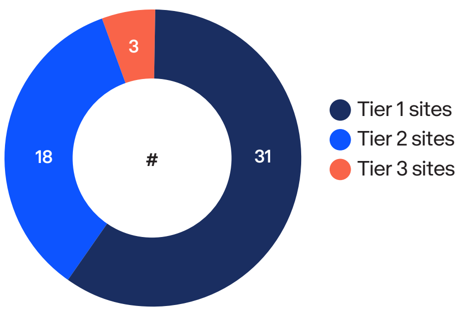
In FY26, we **closed 151 corrective actions** relating to priority and major findings identified in this or previous years' audits

This included **closing 85, or 45 per cent, of corrective actions** relating to priority and major findings identified in FY26's audits

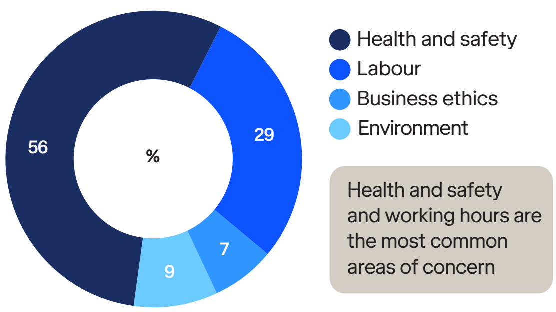
Number of priority and major findings by category in FY26[31]



Number of supplier audits by tier in FY26



Percentage of priority and major findings by type in FY26



30. Telstra reports the number of audits conducted by Telstra and JAC peers under the JAC guidelines on suppliers relevant to Telstra. The disclosed metric is derived from audits reported by JAC. From this we extract the subset which relate to Telstra suppliers conducted during this financial year. The data excludes audits conducted in FY26 where the audit report is not finalised until FY27. In FY26, there were no supplier-led audits.
31. For a description of the categories, see the *Glossary*. Audits identify three tiers of findings: priority (which is the most serious), followed by major and lastly minor.

Number of priority and major findings by location in FY26[32]

● Sites audited (52 total) ● Priority and major findings (189 total)

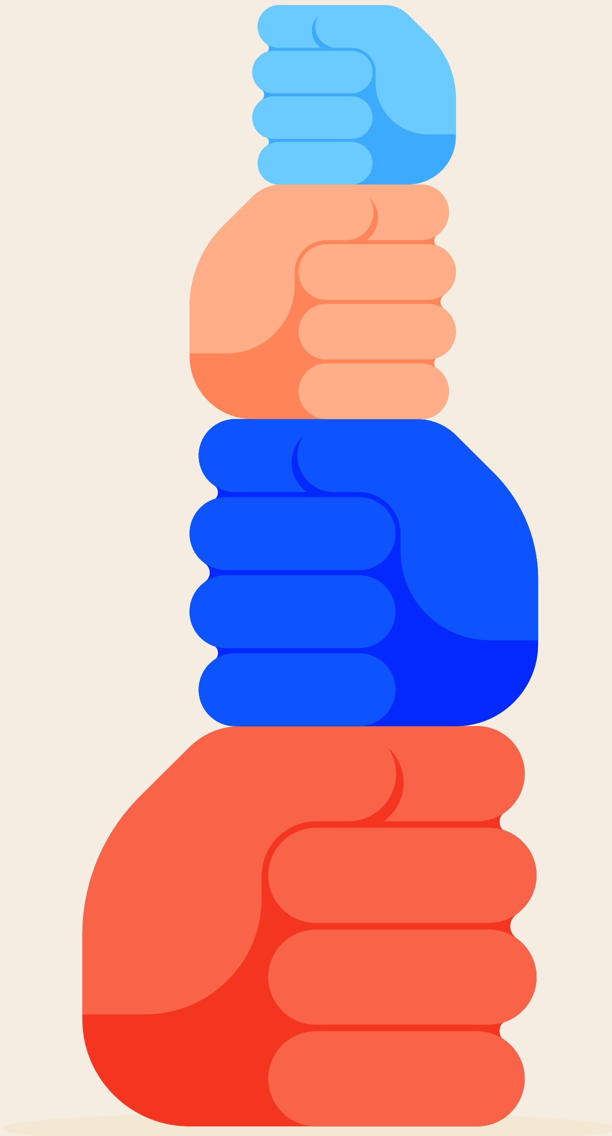
Deep dive on our battery supply chains

In FY26, Telstra conducted independent third-party audits of three battery suppliers. These suppliers operate in high-risk, labour-intensive manufacturing environments. The audits covered three facilities across battery manufacturing operations. Suppliers demonstrated cooperation throughout.

Findings primarily related to health and safety, labour practices, environmental management and business ethics. Key health and safety findings included inadequate facilities for nursing mothers, gaps in fire safety and evacuation measures, insufficient insulation of electrical boxes and a lack of building safety inspections for ageing infrastructure.

Labour-related findings were identified at two suppliers. These included excessive overtime, consecutive days worked without mandated rest periods and insufficient overtime compensation.

Through ongoing collaboration, clear expectations and sustained follow-up, Telstra worked with the suppliers to address these findings. This resulted in the closure of 100 per cent of identified issues across all audited facilities and strengthened compliance across health and safety, labour, environmental and ethical practices.



32. Audits identify three tiers of findings: priority (which is the most serious), followed by major and lastly minor.

Improving labour practices in our IT services supply chains

In the second half of FY26, we conducted independent audits of two major global professional services suppliers that provide IT services across Telstra. Both suppliers engaged constructively throughout the process.

Across the eight sites audited, one site achieved full compliance. We identified findings at the remaining seven sites.

Labour-related findings included excessive overtime and gaps in social insurance coverage. Health and safety findings included gaps in:

- licensing and permits
- fire safety and evacuation procedures
- first aid training
- occupational health risk assessments.

Remediation processes are progressing across both suppliers. For the first supplier, remediation activities are ongoing across three sites. For the second supplier, six findings have been closed, including one priority finding. This represents 50 per cent of total findings for the second supplier.

Corrective actions focus on:

- strengthening compliance with licensing requirements
- improving safety systems and training
- completing health and safety risk assessments.

Telstra continues to monitor remediation process progress closely. We aim to work with both suppliers to support timely and sustainable closure of all findings.

Internal audits

We undertake internal assurance activities to help us understand how well our construction and physical network infrastructure maintenance suppliers are meeting our expectations. In FY26, we carried out:

- 11 management system audits
- 3,920 onsite health, safety and environment inspections.

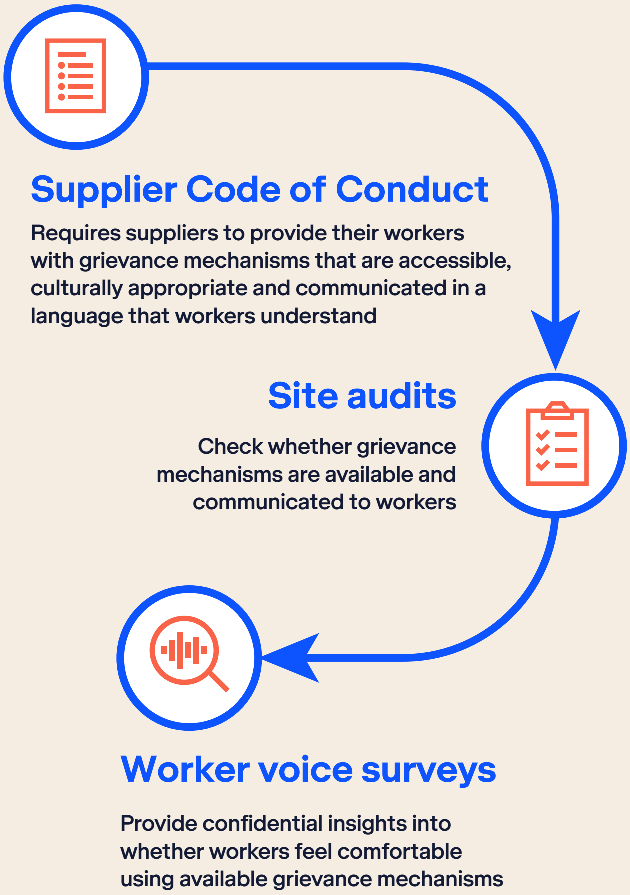
These activities help us check whether suppliers are meeting required standards, identify potential areas of non-compliance and confirm our processes to manage labour rights risk operate as intended.

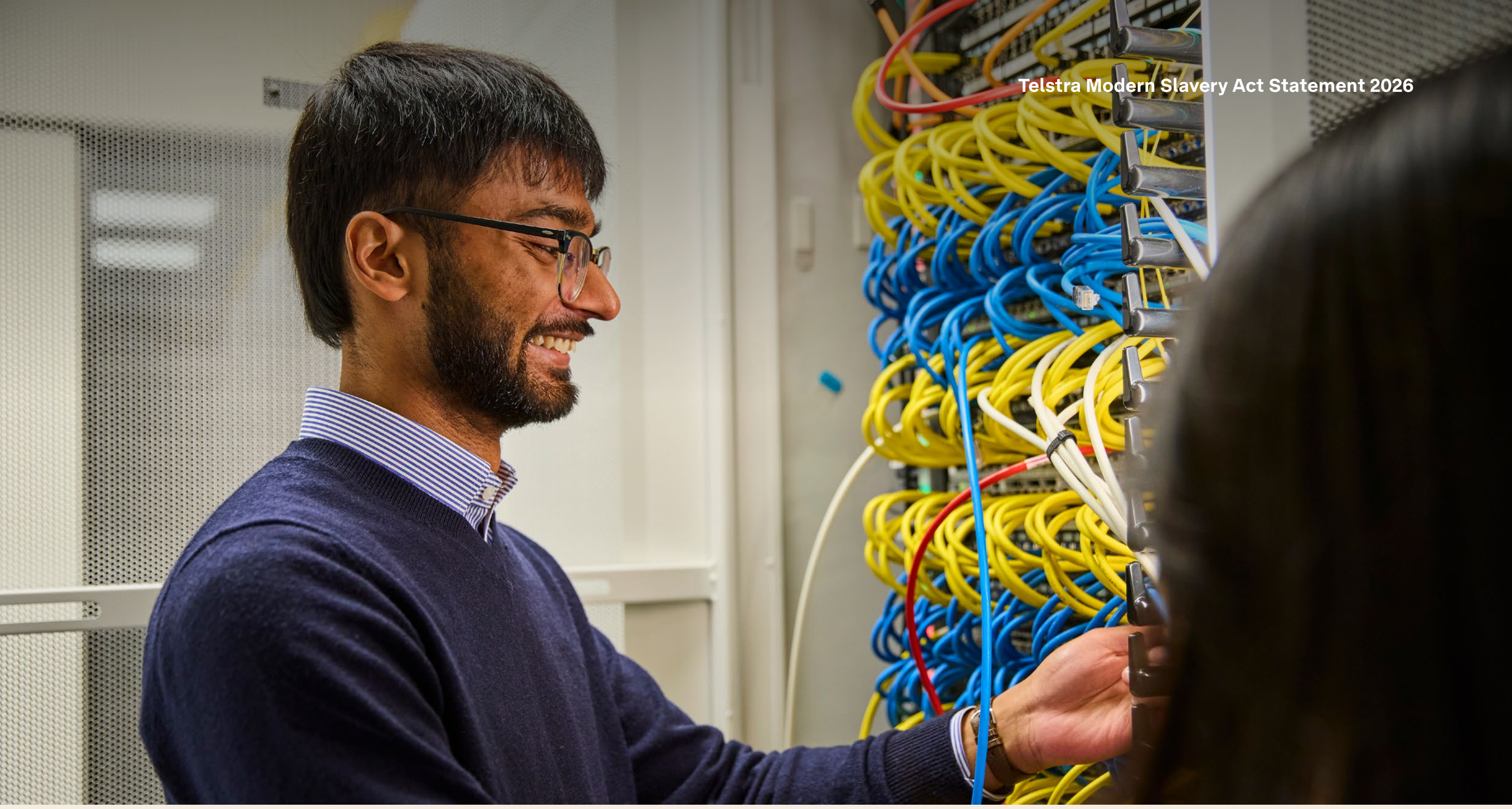
Update on our previous audit case study

In FY25, Telstra conducted an audit of a tier 1 promotional products supplier. During FY26, we continued to actively engage with the supplier to remediate the identified findings, with 89 per cent now addressed. Telstra remains committed to maintaining a strong relationship with this supplier, recognising their overall healthy environmental, social and governance performance.

Grievance mechanisms in our supply chains

We recognise that workers in our supply chains need safe and accessible ways to raise concerns. Many people may feel unable to report issues directly to Telstra or be unaware of our Whistleblowing Service, so effective supplier-level grievance mechanisms are essential. We check how well these mechanisms are understood and used by workers through our audit and worker voice programs.



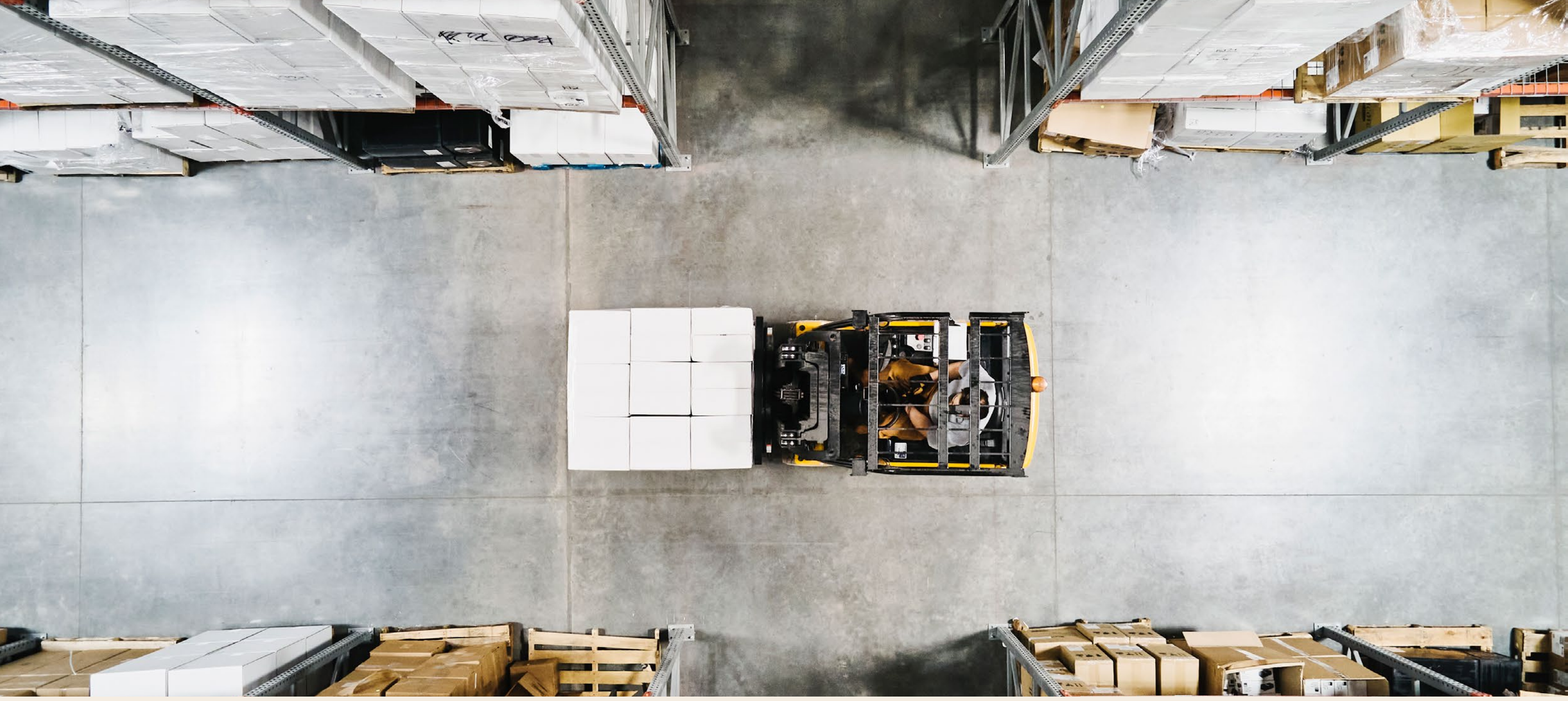


How we check the effectiveness of our actions[33]

We assess the effectiveness of our actions across six components that we consider key to an effective response.

Key component	How we assess this component
Coordinated internal response	• We report progress on our modern slavery response to Telstra's Risk and Sustainability Committee • We report any material worker exploitation-related compliance breaches to Telstra's Risk and Sustainability Committee • We consult with entities and business units across the Telstra Group on this statement to help identify gaps in coordination, communication or our response.
Clear and embedded policies	• We regularly review our policies to check they remain relevant and applicable • We incorporate learnings from identified breaches or investigations of misconduct.
Effective training for our people	• We monitor training completion rates to understand awareness levels across the Telstra Group • We periodically review the target training audience • We update training based on feedback from the target audience.
Robust risk assessment and supplier engagement processes	• We regularly review our Supplier Code of Conduct and Supplier Governance Framework to confirm they continue to mitigate modern slavery risks in our supply chains • We audit selected suppliers to assess how well they implement our Supplier Code of Conduct • We monitor key indicators across our due diligence processes • We work collaboratively with suppliers on audit findings, track corrective actions and monitor progress.
Trusted and accessible grievance mechanisms	• We track the number and type of reports, investigations and substantiated claims received through our grievance mechanisms • We check supplier grievance mechanisms during site audits and worker voice surveys.
Focus on continuous improvement	• We consider independent third-party analysis of statements to benchmark and improve our modern slavery approach • We seek feedback from relevant external experts • We identify good practice trends through our participation in industry groups.

33. Specific information on how reporting entities Telstra Health and Digicel Pacific Group check the effectiveness of their actions is set out in the *Telstra Health* and *Digicel Pacific Group* sections of this statement. For more information, see the *Reporting entities and disclosure notes* section of this statement.



How we consult within our group

Consultation with existing entities

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

Are they reporting entities?	**Are they integrated with Telstra's systems?**
Do they have employees?	**Do they have high risk operations or supply chains?**

The consultation process includes:

- meetings with key people to support a modern slavery risk assessment
- providing guidance on risk level and advising on ways to mitigate identified risks
- supporting ongoing modern slavery risk mitigation efforts.

Each year:

- we inform directors of all Telstra Group entities about our responsibilities under modern slavery legislation and our reporting process and invite feedback
- management of Telstra Group entities review and approve relevant sections of this statement.

New acquisitions

Our due diligence processes for significant entity or business acquisitions include consideration of modern slavery risks. After we acquire an entity, we may implement uplift measures where needed. These steps may include the processes described in the *Consultation with existing entities* section of this statement. As part of our commitment to continuous improvement, in FY26 we reviewed the effectiveness of these processes. In response, we implemented a formal governance process to check compliance with this process on a six-monthly basis.

Newly acquired entities are generally required to adopt our Group Policies and processes in line with the Telstra Group Policy Governance Framework and Group Governance Operating Model. After acquisition, our process is to work with each entity to support a more detailed modern slavery risk assessment and any risk mitigation efforts.

Telstra International

In FY25, we reported that Telstra International:

- undertook a modern slavery risk assessment
- committed to confirmatory diligence to verify its supplier governance processes are being appropriately followed.

Telstra International undertook spot checks of risk assessments for three higher-risk suppliers. The reviews did not identify any issues with supplier governance controls.

Telstra International engages a third-party supplier to provide security guards at Telstra's Philippines cable landing station. In FY26, Telstra International identified that this supplier had not paid all benefits owed to these workers. It investigated the issue and engaged with the supplier. In response, the supplier provided evidence that it had paid two of the three outstanding benefits to the workers. Despite repeated efforts to engage, the supplier did not provide evidence that it had paid the final benefit. Telstra International decided to end its contractual relationship with the supplier. To mitigate the impact of this decision on the security guards, it required that its new provider offer to engage all security guards working at Telstra's Philippines cable-landing station on terms at least as favourable as their previous engagement.

fetch

Fetch TV

Telstra holds a 51 per cent controlling interest in Fetch TV and continues to play an active role in strengthening its approach to modern slavery. In FY26, we worked closely with Fetch TV to support further uplift of its modern slavery response and progress against its FY26 commitments.

✔ Achieved ● In progress ● Not achieved

FY26 commitments		Progress
Provide training on supplier on-boarding processes, including modern slavery considerations, to relevant staff members	In progress	Fetch TV began rolling out targeted training for relevant procurement and legal team members to build awareness of modern slavery risks and support consistent application of updated supplier onboarding criteria. This included providing training packs to 100% of eligible employees. Fetch TV expects to roll out in-person training sessions in early FY27.
Expand the target training audience for modern slavery training and rolling it out to all employees	Achieved	All employees both in Australia and Malaysia completed modern slavery training through onboarding processes and annual refresher cycles. Completion rate is 100%.
Carry out a site visit for Fetch TV's main set top box manufacturer	Not achieved	In FY26, Fetch TV reviewed the need for a physical site visit to its manufacturing partner in China and decided not to proceed due to operational priorities and current fiscal settings. Instead, Fetch TV used alternative assurance measures, including recent third-party JAC audit reviews and regular engagement with the manufacturer's management. It is also working towards remote monitoring (for example, remote 'walk-throughs' of the relevant factory). On this basis, Fetch TV is satisfied the manufacturer is currently meeting all quality and delivery benchmarks. This includes compliance with the human rights expectations in our Supplier Code of Conduct. Fetch TV will reassess the feasibility of an in-person visit in future years.
Develop a guidance document for its teams on how to review responses to Fetch TV's supplier questionnaire	Achieved	Fetch TV finalised a standardised internal guidance document that sets out a consistent, step-by-step process for evaluating supplier responses to support consistency in risk identification.
Start the roll out of its supplier questionnaire to new and existing higher-risk suppliers such as its set top box manufacturers	Achieved	Fetch TV distributed the modern slavery questionnaire to identified high-risk suppliers, including set-top box manufacturers, to strengthen supply chain transparency.
Put in place a formal process to measure the effectiveness of the supplier questionnaire and track its use.	Achieved	Fetch TV established a formal tracking and review framework to monitor supplier questionnaire completion rates and assess how the data informs its supplier risk profiles.

Health

Telstra Health

Telstra Health is a Reporting Entity.

Who Telstra Health is

Operations

Development and provision of software solutions to governments, hospitals and health and aged-care providers. Operates the National Cancer Screening Register, 1800RESPECT services and the Leaving Violence Program for the Australian Government.

Workforce

Direct workforce of approximately 1,460 people and indirect workforce of approximately 762 people across Australia, the United Kingdom, Canada, Bahrain and the Kingdom of Saudi Arabia, outsourced IT development labour arrangements in India and Vietnam and outsourced business support labour arrangements in the Philippines.

Supply chains

Approximately 322 active suppliers in 18 countries, with main spend categories comprising its contracted workforces, an Australian-based contact centre and office management services.

Telstra Health's modern slavery risks

Generally consistent with the Telstra Group,[34] but operates in higher-risk jurisdictions such as the Middle East and has assessed its offshore labour forces, such as those provided by its managed service partners, as higher risk.

How Telstra Health addresses modern slavery risks

Governance

Adopted key Telstra Group Policies including the Code, Human Rights Policy, Supplier Code of Conduct and Whistleblowing Policy.

Supplier governance

Uses a digitised software solution requiring new suppliers to complete a modern slavery questionnaire. Leverages selected Telstra Group suppliers and contracts for purchases. In FY26, updated its vendor governance model and embedded the modern slavery assessment as a mandatory check at the point of supplier selection. Introduced a dedicated Procurement function to manage supplier risks, including modern slavery risks. Integrated these checks with its internal automated ticketing process.

Training

All employees complete Business Essentials Training annually with a 100 per cent completion rate for FY26. Relevant employees complete Addressing Modern Slavery Training with a 100 per cent completion rate for FY26.

Additional measures for high-risk areas

In FY26, identified higher-risk tier 2 suppliers (property and facility management suppliers in the Middle East) for further review. Undertook a detailed review of questionnaire responses from these suppliers. Review focused on local business practices rather than group-level policies applied internationally. Completed in-person interviews to validate findings. Findings did not identify any concerns.

How Telstra Health checks the effectiveness of its actions

Ongoing review and uplift

Reviews policies and processes regularly and incorporates feedback from suppliers and the Telstra Group into its modern slavery response.

Reporting and governance

Reports any known or suspected compliance breaches to the Telstra Health Risk and Legal teams and to the Telstra Group when required. Quarterly governance meetings track questionnaire completion rates, address concerns and monitor process effectiveness.

Monitoring key metrics

Records and tracks complaints received through whistleblowing and human resources mechanisms; material human rights incidents (should any arise); completion rates for relevant training; and supplier questionnaire completion and responses.

How Telstra Health consults within its group

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

Telstra Health's FY27 commitments

In FY27, Telstra Health will:

- continue to review and refine its modern slavery questionnaire to improve visibility into practices and supply chain arrangements across all jurisdictions
- further embed the supplier governance process so it is sustainable and not dependent on individuals
- continue detailed monitoring and assessment or audit of higher-risk tier 2 suppliers in the Middle East.

Telstra Health's progress

✔ Achieved ● In progress ● Not achieved

FY26 commitments	Progress
Continue to manage its key modern slavery risks including areas of greater risk such as operations in the Middle East and detailed review of tier 2 suppliers, such as office space providers	✔ See *Additional measures for high-risk areas*
Conduct deep dive assessments in relation to its offshore labour resource providers including its managed partner provider which has a significant labour force in India	✔ Deep dive workshops conducted with major offshore managed service provider focused on deeper understanding of supply chain and secondary risks as well as providing reassurance that all modern slavery commitments are being met. No significant issues raised.
Uplift its vendor management processes by further automating and assessing vendor onboarding requirements including fully automating assessments of compliance with its modern slavery questionnaires	✔ See *Supplier governance*
Develop a vendor governance model including focus on regular modern slavery compliance reporting and assessment	✔ See *Supplier governance*

The content in relation to Telstra Health (page 26) was approved by the CEO and Board of Telstra Health Pty Ltd.

34. For more information on Telstra's modern slavery risks and how we assess them, see the *Our modern slavery risks* section of this statement.

Digicel

Digicel Pacific Group

Digicel Pacific Group is a Reporting Entity.

Who Digicel Pacific Group is

Operations
Largest mobile operator in the South Pacific. Provides mobile and ICT services and operates telecommunications infrastructure.

Workforce
Direct workforce of 1,676 people and indirect workforce of 36 people across Papua New Guinea (PNG), Fiji, Naoero, Samoa, Tonga and Vanuatu.

Supply chains
Approximately 1,460 active suppliers in 49 countries, with main spend categories comprising network equipment; customer devices; bandwidth; field operations; electricity; and fuel and logistics services.

Digicel Pacific Group's modern slavery risks

Operations
Commission-based 'feet on the streets' workers (FOTs) and freelancers;[35] workers engaged by distributors and their partners and distribution channels; interns; workers at retail partners and contingent network and IT workers engaged through third parties.

Supply chains
Handsets and SIM cards; IT workstations and accessories; field services including construction and maintenance of physical network infrastructure; office maintenance; cleaning and gym service providers; media hardware; construction related to the Digicel PNG Foundation; security services; logistics services; and construction and maintenance of retail stores and kiosks.

How Digicel Pacific Group addresses modern slavery risks

Governance
Adopted relevant Telstra Group Policies.[36] Its board, including three independent non-executive directors, oversees modern slavery risk and regularly reviews updated risk ratings.

Supplier governance
Manages suppliers through a supplier governance framework, including continuous monitoring of suppliers that make up 80 per cent of its spend. Since FY25, it requires suppliers to provide Statements of Compliance with the Supplier Code of Conduct as part of its onboarding process and is rolling out contract variations to existing higher-risk suppliers requiring them to comply with the Supplier Code of Conduct. From FY26, it conducts annual performance reviews for high-value and high-risk suppliers, including assessments of contractual compliance. Suppliers representing 80 per cent of spend are integrated into the Telstra Group's continuous monitoring tool.

Onboarding risk assessments
In early FY26, it rolled out a supplier governance tool to support risk assessments for new high-value sourcing projects. Risk assessments must be completed before an engagement is approved. The result of the assessment (including any mitigation plan) is considered as part of the selection process, with critical and high-risk suppliers escalated to the Risk team. Over FY26, it monitored and adjusted this tool.

Audits and investigations
If a potential labour rights issue arises, it works with the Telstra Group to investigate. Actions may include direct engagement with higher-risk suppliers through site visits and employee interviews; engaging an independent third-party auditor; working with Telstra Group investigations specialists; or engaging external expert advice for more serious issues.[37]

Investigation and remediation protocol
In FY26, engaged a third-party expert to review its supplier governance, procurement and other internal processes and to help prepare an investigation and remediation protocol for human rights incidents in the supply chain. Once finalised, it will integrate the protocol into existing supplier governance processes.

Training
All employees undertake Business Essentials Training annually with a 100 per cent completion rate for FY26. All PNG employees and selected target groups in Hub markets complete Addressing Modern Slavery Training, with a 98 per cent completion rate for FY26.

Grievance mechanism
People can raise concerns through the Telstra Whistleblowing Service, which is used for complaints relating to Digicel Pacific Group.

Additional measures for FOTs work
If an individual performs FOTs work on a commission-only basis, they receive a top up payment if their commission income falls below the minimum wage for the time spent performing this work.

How Digicel Pacific Group checks the effectiveness of its actions

Ongoing review and uplift
Regularly consults with the Telstra Group on its modern slavery response and incorporates feedback.

Reporting and governance
Reports serious labour rights incidents to the Telstra Group and works collaboratively on responses.

Monitoring key metrics
Records and tracks complaints received via whistleblowing mechanisms, material human rights incidents (should any arise), completion rates for relevant training and supplier completion of, and compliance with, supplier governance processes, including onboarding requirements.

How Digicel Pacific Group consults within its group

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

Digicel Pacific Group's FY27 commitments

In FY27, Digicel Pacific Group will:

- continue to roll out and embed its supplier governance program
- organise a supplier forum to communicate expectations, including on modern slavery and labour rights risk management.

35. FOTs and freelancers are engaged to promote mobile financial services and assist with customer queries, e.g., SIM registration and activation of mobile wallets.
36. For more information, see the *Our policies* section of this statement.
37. For more information, see the *Protecting workers in the security services sector* section of this statement.

Digicel Pacific Group's progress

Achieved In progress Not achieved

FY26 commitments		Progress
Assess the feasibility of a dedicated Supplier Governance tool	Achieved	See *Onboarding risk assessments*
Uplift its supplier onboarding processes to explicitly incorporate labour rights expectations into higher-risk contracts going forward	Achieved	See *Supplier governance* and *Onboarding risk assessments*
Develop an investigations and remediation protocol for human rights issues in the supply chain	In progress	See *Investigation and remediation protocol*

The content in relation to Digicel Pacific Group (page 27 and 28) was approved by the PNG and Hub markets CEOs of Digicel Pacific Group and Boards of Telstra PM Holdings Pty Ltd and Telstra PM Pty Ltd.

Protecting workers in the security services sector

In prior years, we reported on Digicel Pacific Group's ongoing investigation of a PNG security services provider's compliance with our Supplier Code of Conduct. In FY26, Digicel Pacific Group finalised an independent audit of the supplier's employment conditions and firearms governance. The audit results identified serious labour rights concerns, including underpayment of wages, excessive overtime, unauthorised deductions from wages and workplace loan arrangements. The issues identified are serious and indicative of systemic country-level risk, and they have not yet been fully remediated.

With assistance from an independent human rights expert, Telstra and Digicel Pacific Group reviewed the audit results and mapped identified issues against the ILO's forced labour indicators. While we did not identify any instances of confirmed modern slavery, we concluded that certain indicators for modern slavery were present and that the incident should be treated as a serious labour rights risk.

In response to the findings, Digicel Pacific Group engaged a PNG-based independent expert to develop a supplier engagement plan tailored to the local context. It also engaged an Australian-based non-governmental organisation to review its proposed response for alignment with the UNGPs and leading guidance. Digicel Pacific Group is committed to providing for, or cooperating in, remediation processes for the identified human rights impacts as appropriate and in line with its level of involvement, informed by expert external advice.

PNG presents a complex operating environment for supplier governance and modern slavery risk mitigation activities. Supplier governance and oversight is challenging and there is uneven labour rights risk maturity among suppliers. This can reduce the reliability of supplier-provided information and limit independent verification of labour conditions. In PNG, relevant regulations, including in the labour, wage and human rights fields, are inconsistently enforced. Commercial leverage, legal remedies and assurance infrastructure are limited. A further challenge arises from the limited number of providers across critical categories, reducing viable substitution options. This context does not reduce the seriousness of the supplier-specific findings or Digicel Pacific Group's responsibility to respond; however it does mean that progress is likely to be incremental and dependent on continued monitoring and engagement.

In line with Digicel Pacific Group's obligations in the Human Rights Policy and the UNGPs, its response is to seek to address identified worker impacts by uplifting working conditions at the supplier, strengthen its own processes and embed independent verification procedures. This response is further informed by the fact that security is a key risk in PNG, protecting Digicel Pacific Group's people, sites and network assets. Withdrawing reflexively may not improve outcomes for the supplier's workers and could create safety risks for Digicel Pacific Group's own workforce and others attending its sites. However, where a supplier does not demonstrate a willingness to engage constructively, cooperate in remediation activities, or make reasonable and measurable progress in addressing identified issues, Digicel Pacific Group may responsibly exit the relationship after considering the potential impacts of disengagement on workers, safety and continuity of critical services. At the time of reporting, this option remains under active consideration where sufficient improvement is not evident.

Digicel Pacific Group engaged the supplier on the identified non-compliance, using a staged approach with an initial focus on correcting wage and superannuation underpayments. To support the supplier going forward, it proactively renegotiated the supplier's contract and increased payments with the aim of enabling the supplier to meet PNG's FY26 national minimum wage increases. It has also strengthened internal processes to seek to enable timely approval and payment of invoices and introduced improved systems to increase and better monitor compliance and accountability. It is monitoring the implementation and effectiveness of these measures, which remains ongoing, to confirm whether they result in sustained improvements for workers.

While this response has taken time and progress has been slower than originally anticipated, Digicel Pacific Group considers it important that its response be informed by independent expertise, aligned with the UNGPs and appropriate to the local operating context.

Digicel Pacific Group has identified opportunities to further strengthen how its existing supplier governance frameworks are applied in practice. In FY27, its focus is on further uplifting internal supplier governance capability. These initiatives are designed to improve early identification of risks and strengthen engagement with suppliers in higher-risk environments. Learnings from this case are directly informing Digicel Pacific Group's efforts to uplift capability and consistency in applying its supplier governance framework in FY27.

Our progress[38]

Telstra Group FY26 commitments

Achieved · In progress · Not achieved

Commitment	Progress	
Monitor and manage adoption of our uplifted supplier governance technology system and associated processes	Achieved	See the *Rolling out improvements to supplier governance across Telstra* section of this statement
Conduct analysis to identify potential new or emerging human rights risk areas in our supply chains	Achieved	See the *Continuous assessment of our human rights risks* section of this statement
Further embed human rights, including modern slavery, guidance materials and set up processes to monitor their effectiveness	Achieved	See the *Labour rights investigations and remediation protocol* and *New acquisitions* sections of this statement
Uplift sustainability risk strategy, including human rights and modern slavery, and align it with existing risk processes	In progress	See the *Labour rights risk management* section of this statement
Create internal overarching resource on human rights, including modern slavery, for use by teams	Achieved	See the *Educating our teams* section of this statement

Telstra Group FY27 commitments

In FY27, Telstra will:

- Review and uplift the human rights section of our supplier due diligence questionnaire
- Conduct analysis to identify potential areas of concern around labour rights for migrant workers in our Australian supply chain.

38. Specific information on the progress of reporting entities Telstra Health and Digicel Pacific Group is set out in the *Telstra Health* and *Digicel Pacific Group* sections of this statement. For more information, see the *Reporting entities and disclosure notes* section of this statement.

Appendix 1: Reporting Entities

Reporting entity	Description
Australian Act reporting entities	
Telstra InfraCo	Owns and operates Telstra's passive infrastructure asset business (excluding towers)
Telstra International	Owns and operates Telstra's business of providing international services using international assets, including Digicel Pacific Group
Telstra Health	Main operating entity in the Telstra Health Group. Primary operations are the development and provision of software solutions to governments, hospitals and health and aged care providers as well as operation of the National Cancer Screening Register, 1800RESPECT services and the Leaving Violence Program for the Australian Government
Telstra Holdings	Holding company of many of Telstra International's subsidiary companies
Telstra Limited	Owns and operates many of Telstra's businesses including Telstra's retail, wholesale, Health, Energy and Purple businesses, excluding the businesses of Telstra InfraCo, Telstra International and Amplitel. Telstra Limited also owns and operates the active parts of the Telstra Group's infrastructure network
Telstra PM Holdings and Telstra PM	Interposed holding entities for Digicel Pacific Group, which provides mobile phone and ICT services (including TV, home and business internet solutions) and operates telecommunications infrastructure across six markets in the South Pacific region
TGL	The ultimate parent company of the Telstra Group whose shares are publicly traded on the ASX
UK Act reporting entity	
Telstra UK	Provider of telecommunication services in the UK, Europe, the Middle East and Africa

Appendix 2: Legislative criteria

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

Australian Act – mandatory criteria	UK Act – recommended criteria	Reference in this statement
Identify the reporting entity		*Reporting entities and disclosure notes* *Annual disclosure* *Our operations* *Appendix 1*
Describe the structure, operations and supply chain of the reporting entity	Organisation's structure, its business and its supply chains	*Our structure* *Our operations* *Our workforce* Our supply chains *How we consult within our group* *Telstra Health* *Digicel Pacific Group* *Appendix 1*
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities that the reporting entity owns or controls	The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place	*Annual disclosure* *Our workforce* *Our modern slavery risks* *How we consult within our group* *Telstra Health* *Digicel Pacific Group*
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	• Policies in relation to slavery and human trafficking, due diligence processes in relation to slavery and human trafficking in its business and supply chains • Steps taken to assess and manage the risk of slavery and human trafficking • Training on slavery and human trafficking available to its staff	*FY26 highlights* *Our approach* *Our modern slavery risks* *How we address our modern slavery risks* *How we consult within our group* *Our progress* *Telstra Health* *Digicel Pacific Group* *Protecting workers in the security services sector*
Describe how the reporting entity assesses the effectiveness of such actions	The organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	*How we check the effectiveness of our actions* *How we consult within our group* *Telstra Health* *Digicel Pacific Group*
Describe the process of consultation with any entities that the reporting entity owns or controls		*How we consult within our group* *Telstra Health* *Digicel Pacific Group*
Any other information that the reporting entity considers relevant		*CEO statement* *Annual disclosure* *Our progress*
Details of approval and signature	Details of approval and signature	*Annual disclosure* *Telstra Health* *Digicel Pacific Group*

Appendix 3: Glossary

Term	Meaning
Addressing Modern Slavery Training	Telstra's training on modern slavery risks in Telstra's value chain and how to take action to address them.[39]
Amplitel	Towers Business Operating Trust ABN 75 357 171 746. Its trustee is Amplitel Pty Ltd ABN 15 648 133 073.
Amplitel HoldCo	TowerCo No. 2 Pty Ltd ABN 53 648 133 297.
Audits or site audits	Telstra engages independent auditors to conduct site audits aligned with industry standards. The audits focus on health and safety, environment, human rights and business ethics and include worker interviews, site visits to assess labour conditions and documentation reviews.
Australian Act	*Modern Slavery Act 2018* (Cth).
Business Essentials Training	Mandatory annual training which covers the Code and includes a human rights module which covers modern slavery risk mitigation.[39]
Canadian Act	*Fighting Against Forced Labour and Child Labour in Supply Chains Act* (CA).
Code	Telstra's Code of Conduct.[40]
Construction and physical network infrastructure maintenance	Category of Telstra's supply chains that includes goods and services necessary for building, maintaining and repairing Telstra's physical network infrastructure, including: • construction, installation and maintenance of Telstra's network and the equipment used for this such as batteries, uninterruptible power supplies, heating, ventilation and air conditioning, racks, solar panels and generators • property and fleet management.
Digicel Pacific Group	Telstra PM, Telstra PM Holdings and their owned or controlled entities.
Direct workforce	People working at the direction of Telstra Group even if they are provided by a vendor (i.e., where an agency provides contractors).
Domestically-contracted suppliers	Suppliers that have contracts with Telstra's Australian entities, regardless of where the suppliers themselves are located.
Fetch TV	Media Innovations Holdings Pty Ltd ABN 21 636 073 884 and its subsidiaries.
FY25	Financial year ending 30 June 2025.
FY26	Financial year ending 30 June 2026.
FY27	Financial year ending 30 June 2027.
Group Governance Operating Model	Framework outlining: • the governance and operation requirements of entities in the Telstra Group • the governance principles and standards with which Telstra Group entities are required to comply • who will make key decisions and which entity or entities will execute on a range of shared services and functions.
Group Policies	Telstra's Group Polices are those policies with widespread application and significant impact to the Telstra Group and are overseen by the Telstra Group Policy Governance Framework, including the Code, the Human Rights Policy and the Whistleblowing Policy.
Group Policy Governance Framework	The Telstra Group Policy Governance Framework: • provides a framework for the development, establishment, amendment and review of Telstra Group Policy documents • defines the roles and responsibilities in relation to the development, establishment, amendment and review of Group Policy documents • includes the Code and Group Policies.
Hub markets	Fiji, Naoero, Samoa, Tonga and Vanuatu.
Human Rights Policy	A Telstra policy setting out our commitment to respect and support human rights.[38]
ICT sector	Category of Telstra's supply chains that provide technology products and services required to build, operate, maintain and support the telecommunications networks and digital services.
ILO	The International Labour Organization.
Indirect workforce	Workers engaged by Telstra via a vendor to deliver an outcome, for example as part of an overarching fixed price agreement.
Main Employing Entities	TGL, Telstra Limited, Amplitel, Telstra InfraCo and Telstra International, which together employ most employees in the Telstra Group.

39. For more information, see the *Our training* section of this statement.
40. For more information, see the *Our policies* section of this statement.

Term	Meaning
Modern slavery	'Modern slavery' as defined in section 4 of the Australian Act and 'slavery and human trafficking' as defined in section 54 of the UK Act.
Other categories	Categories of Telstra's supply chains that comprise non-core activities such as professional services, media and marketing, travel and uniforms.
PNG	Papua New Guinea.
Procurement Principles Training	Telstra's training to help our procurement specialists understand their responsibilities.[41]
Reporting Entities	The reporting entities in the Telstra Group under the Australian Act and UK Act, set out in *Appendix 1* of this statement.
Risk rating	• Labour rights country risk ratings are calculated based on countries' scores in the Walk Free Global Slavery Index's analysis of countries' vulnerability to modern slavery • Total vulnerability score of 46 and above is high, 45-16 is medium, 15 or below is low • Where this information is not available for a particular country, labour and country risk ratings are calculated based on countries' scores in the World Bank Governance Indicators, Freedom House Global Freedom Score and Corruption Perceptions Index.
Supplier Code of Conduct	A Telstra policy setting out the minimum standards of behaviour we expect from our suppliers.[42]
Supplier Governance Framework	Telstra's Supplier Governance Framework sets out the minimum requirements our team must meet to effectively manage our suppliers and their suppliers.[43]
Supplier Governance Framework Training	Telstra's training on our Supplier Governance Framework and supplier risk.[41]
Supplier Risk Categories	Seven risk categories Telstra uses to assess supplier risk.[43]
Telstra, the Telstra Group, we, our, us	TGL and its owned or controlled entities. The approach of non-integrated entities in the Telstra Group may differ from that of the Telstra Group more broadly. For more information, see the *Reporting entities and disclosure notes* section of this statement.
Telstra Health	Telstra Health Pty Ltd ABN 38 163 077 236.
Telstra Health Group	Telstra Health and its subsidiaries.
Telstra Holdings	Telstra Holdings Pty Ltd ABN 45 057 808 938.
Telstra InfraCo	Telstra Corporation Limited ABN 33 051 775 556.
Telstra International	Telstra International Holdings Pty Ltd ABN 95 648 133 475.
Telstra Limited	Telstra Limited ABN 64 086 174 781.
Telstra PM	Telstra PM Pty Ltd ABN 21 653 836 321.
Telstra PM Holdings	Telstra PM Holdings Pty Ltd ABN 71 648 132 941.
Telstra UK	Telstra UK Limited Company Number: 03830643.
UK Act	*Modern Slavery Act 2015* (UK).
UNGPs' continuum of involvement	Explains how a business may be involved in potential or actual human rights impacts such as modern slavery: • businesses may **cause** an adverse human rights impact if their actions directly result in modern slavery • businesses may **contribute to** an adverse human rights impact where the impact would have been unlikely to occur without their actions or omissions, including if their actions or omissions incentivise or facilitate modern slavery • businesses may also be **directly linked** to an adverse human rights impact where their operations, products or services are connected to modern slavery through their business relationships.
Versent	Versent Pty Ltd ABN 78 600 701 764.
Versent Group	Versent Group Pty Ltd ABN 13 097 323 781 (formerly Telstra Purple Pty Ltd).
Whistleblowing Policy	A Telstra policy setting out protections for those reporting concerns.[42]
Whistleblowing Service	Telstra's confidential, independent whistleblowing service.[44]
Worker voice surveys	Telstra uses worker voice surveys to obtain anonymous and confidential feedback directly from workers on their working conditions, which: • are managed by a third party • offer insights on topics that can otherwise be difficult to identify, such as harassment • can cover a wider sample size than audits.
The year, reporting year, period, reporting period	FY26 (1 July 2025 – 30 June 2026).

41. For more information, see the *Our training* section of this statement.
42. For more information, see the *Our policies* section of this statement.
43. For more information, see the *Supplier Governance Framework* section of this statement.
44. For more information, see the *Grievance mechanisms* section of this statement.