



# Human Rights Policy

## Group Policy Level 1

**Overview:** This Group Policy sets our approach to human rights. You are expected to read, understand and comply with this Group Policy. This Group Policy is supported by the Human Rights Guidance Document.

**Scope:** This Group Policy applies to all employees and contractors of Telstra Group Limited ('Telstra') and its controlled entities (collectively, 'Telstra Group') and any person notified that this Group Policy applies to them, unless an exemption has been granted. We expect suppliers, business partners and other third parties to comply with this policy, which is incorporated into our Supplier Code of Conduct and may be included in third party contracts. In this Group Policy, a reference to 'our' or 'we' is a reference to the Telstra Group unless the context requires otherwise.

Our purpose is to build a connected future so everyone can thrive. Technology has significant power to advance and promote the enjoyment of human rights. However, we also acknowledge that there are ways in which through our activities and business relationships we could cause, contribute to or be directly linked to adverse human rights outcomes. This policy focuses on our commitment to respect human rights. We are a signatory to the UN Global Compact and seek to meet its principles wherever we operate.

**Application:** This Group Policy applies in all jurisdictions in which Telstra operates. Where local law is inconsistent with any provision of this Group Policy, local laws will prevail to the extent of any inconsistency.

## Policy Principles

### *Our commitments*

1. We are committed to respecting and supporting internationally recognised human rights in our own operations and through our business relationships as set out in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ten principles of the UN Global Compact, in line with the UN Guiding Principles on Business and Human Rights. We do this by:
  - a. Complying with applicable legislation that supports human rights wherever we operate. Where our policy goes further than local laws, we'll operate to our policy. If our policy conflicts with local law, we'll follow local law while trying as far as possible to act in accordance with the spirit of our policy.
  - b. Providing a fair, safe and healthy working environment for our employees and contractors that is free from unlawful discrimination, harassment, bullying or victimisation.
  - c. Not tolerating or supporting the use of child labour, forced or compulsory labour or other forms of modern slavery.
  - d. Respecting and supporting employees' rights to freedom of association and collective bargaining in accordance with local laws.
  - e. Being an inclusive employer, promoting and valuing diversity within our workforce, among our customers, suppliers and in the communities in which we operate.
  - f. Respecting the right to privacy by protecting the personal information we hold as outlined in our Privacy Statement.

Effective Date: 24 February 2023

Policy Owner: Sustainability Principal, Sustainability External Affairs and Legal

Approval: PGC

**N.B.** This Policy does not form part of any employment contract and Telstra may vary, revoke or replace this Policy from time to time.



- g. Acknowledging the UN Declaration on the Rights of Indigenous Peoples and applying its principles in advancing the rights of Aboriginal and Torres Strait Islander peoples in line with the commitments in our Reconciliation Action Plan.
- h. Having zero tolerance for bribery and corruption in any form. Bribes, pay-offs, "facilitation payments" (payment to speed up routine actions), secret, unjustified or inflated commissions, kickbacks and any like payments or improper benefits, whether directly or indirectly, no matter how large or small in value are strictly prohibited.
- i. Respecting the right to a clean, healthy and sustainable environment by using our technology and expertise to help minimise our environmental impacts, responding to climate change, and using resources more efficiently.
- j. Committing to assessing and addressing the human rights risks and impacts in our operations, supply chain and business relationships through an ongoing process of human rights due diligence.
- k. Committing to maintaining effective grievance mechanisms to support the reporting and remediation of human rights concerns. Where we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for or cooperating in its remediation.
- l. Committing to tracking the effectiveness of our human rights policies and processes and seeking to engage with rightsholders and other stakeholders, to continuously improve our approach to human rights.
- m. Communicating this Group Policy to employees, suppliers and other business partners, and providing appropriate training to employees in relevant business functions to support the implementation of our commitments.

#### *What we expect of you*

- 2. What we expect of all employees, contractors or anyone working on behalf of the Telstra Group:
  - a. Consider the human rights implications of your actions and decisions.
  - b. If you are procuring goods or services, you must have regard to our Code of Conduct, and our Supplier Code of Conduct, which both outline our expectations in the areas of human rights, including labour rights.
  - c. Report any human rights concerns and complaints to your manager and the Chief Sustainability Office or use the Whistleblowing Service.

#### *Reporting on our progress*

- 3. We will report on our progress and performance in our annual sustainability report, modern slavery statement and UN Global Compact Communication on Progress.

#### **Breach of Policy**

Compliance with this Group Policy will be monitored. If you don't comply with this Group Policy you could face disciplinary action. This may include termination of your employment or engagement. If you break the law you may also be personally liable.

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## Policy Definitions

Term	Definition
Child labour	<p>Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:</p> <ul style="list-style-type: none"><li>• is mentally, physically, socially or morally dangerous and harmful to children; and/or</li><li>• interferes with their schooling.</li></ul> <p>The minimum age for employment or work is the higher of: 15 years of age, the minimum age for employment in the relevant country, or the age for completing compulsory education in the relevant country. This Policy does not prohibit participation in workplace apprenticeship programs or light work as defined by the ILO. Children under the age of 18 shall not be employed for any hazardous work or work that is inconsistent with their individual development.</p>
Modern slavery	<p>Modern slavery as defined in the Modern Slavery Act 2018 (Cth). The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.</p>
Supplier	<p>A person or company that provides goods or services to the Telstra Group.</p>

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