

Modern Slavery Statement

Over the Wire Holdings Limited and its subsidiaries (**Over the Wire**) abhor all human rights abuses, including the exploitative practices known as modern slavery. Over the Wire is also committed to maintaining high standards of corporate governance and complying with its obligations. This statement is prepared to meet the requirements of the *Modern Slavery Act 2018 (Cth)* and the *Modern Slavery Act 2018 (NSW)*, and to confirm Over the Wire's firm opposition to modern slavery.

This statement operates in conjunction with the Over the Wire Code of Conduct and relevant policies, including the Over the Wire Whistleblower Policy. This statement is also underpinned by Over the Wire's core values: Progressive, Transparent, Teamwork, Customer Success, Empowerment.

Our business and organisational structure

Over the Wire is a group that provides a range of telecommunications, cloud and IT solutions. Over the Wire companies include Australian subsidiaries Over the Wire Pty Ltd, NetSIP Pty Ltd, FaktorTel Pty Ltd, FaktorTel Holdings Pty Ltd, Sanity Holdings Pty Ltd, Telarus Pty Ltd, VPN Solutions Pty Ltd, Access Digital Networks Pty Ltd, Comlinx Pty Ltd, Digital Sense Hosting Pty Ltd, Zintel Communications Pty Ltd and New Zealand subsidiary Zintel Communications Limited. All entities in the Over the Wire group are companies registered in Australia or New Zealand and are subsidiaries of Over the Wire Holdings Limited, a company listed on the Australian Stock Exchange (ASX). Currently, all Over the Wire office and staff locations are within Australia and New Zealand, and services provided to customers in Australia and New Zealand. Approximately 300 staff are employed by Over the Wire, with a small number of subcontractors also engaged.

Over the Wire's supply chain is made up of approximately 530 suppliers, many of which also operate in the telecommunications and information technology industry. Other sectors of the supply chain include finance, professional services, freight, promotional goods, grocery and office supplies, and clothing. Most of Over the Wire's suppliers are located within Australia.

Simplifying technology to empower business.

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Data Networks



Voice Solutions



Hosting Solutions



Security & IT Support

Due diligence

After considering the size of Over the Wire's workforce and supply chain, and that its business operations are currently confined to Australia and New Zealand, Over the Wire believe the risk of modern slavery practices occurring within its immediate business operations to be low. Over the Wire are taking steps to minimise the risk of modern slavery practices in its greater supply chain.

Vetting of new suppliers

Staff and management responsible for engaging with suppliers have been provided with training in ethical sourcing. This training includes identifying and assessing the risk that a new supplier may cause, contribute to or be linked to modern slavery practices. If a new supplier has not already published or provided material in relation to its human rights values and practices, we seek confirmation and/or evidence that the supplier is also taking its own steps to minimise the risk of modern slavery in its own business and supply chain.

Existing suppliers

Over the Wire intends to audit at least 10% of its existing suppliers for modern slavery risk per annum. Several larger suppliers in sectors such as telecommunications, finance, grocery and office supply are subject to the reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

Over the Wire has identified clothing and promotional product supply as industries with a higher risk of modern slavery practices, and accordingly Over the Wire is careful to procure its uniform clothing and promotional products from suppliers that promote safe and healthy working practices and the overall wellbeing of workers, selecting only uniform suppliers that reports in detail on the human rights practices within its own supply chain.

Whistleblower procedure

Over the Wire has encouraged the reporting of any matter that is unlawful, unethical or irresponsible and ensures that persons reporting such matters are confident that reporting will not result in victimisation, harassment or discriminatory treatment. Ahead of the recent legislative reform in relation to whistleblower protections, Over the Wire has prepared a formal [Whistleblower Policy](#).

Signed



Michael Omeros

Managing Director and Group Chief Executive Officer

7 June 2021