

Pathway to Respecting Human Rights and Addressing Modern Slavery Risks

Acknowledgement

This Handbook was prepared in late 2024 by Edge Impact and Telco Together Foundation in close collaboration with the following organisations who are members of the Foundation and representatives of the Australian Telecommunications community.

THE FOLLOWING MEMBERS AND THEIR REPRESENTATIVES CONTRIBUTED TO THE HANDBOOK:




OPTUS

tpg TELECOM



superloop





Respecting human rights and addressing modern slavery is a shared responsibility across the telecommunications industry, and all players, no matter how large or small, have an important role to play.



Our industry transcends traditional boundaries, offering an unprecedented opportunity for meaningful social and ethical transformation. Beyond mere compliance, we have a strategic imperative to champion human rights and sustainable practices throughout our complex, interconnected value chain.

This commitment goes far deeper than risk mitigation, it requires a due diligence approach that aligns with our corporate purpose and potential for positive impact, with the Pathway to Respecting Human Rights and Addressing Modern Slavery Risks (Pathway) guiding our actions.

By intentionally embedding ethical considerations into every aspect of our operations, we can create a ripple effect through our supply chain that extends beyond our immediate business ecosystem.

We're not just connecting technologies; we're taking measures to promote human dignity, economic opportunity, and social progress. Our supply chains become conduits for fair labour practices, our technologies platforms for inclusivity, and our corporate decisions instruments of meaningful change.

The Pathway provides practical, actionable steps to empower stakeholders across our industry to address modern slavery risks and uphold human rights within their operations and supply chains.

WHAT ARE HUMAN RIGHTS?

Human rights are basic freedoms every person is entitled to, ensuring dignity, equality, and fairness. They include the right to life, freedom from discrimination, fair treatment at work, and access to essential services like education, healthcare, and safe living conditions.

When we speak about respecting human rights within the telecommunications industry, it means ensuring that our actions and decisions support the fundamental standards that ensure everyone can live with dignity, equality, and fairness regardless of who they are, where they come from, or their circumstances. A human rights risk refers to the potential for a company to negatively impact human rights, including through modern slavery.

The [United Nation's Guiding Principles on Business and Human Rights \(UNGPR\)](#) states that businesses should avoid infringing on the human rights of others and should be aware of the human rights impacts they're involved in and effectively address them.

Specifically, this handbook details the importance of addressing risks of modern slavery within business operations and supply chains in order to respect a person's human rights.

WHY IS THIS IMPORTANT TO THE TELECOMMUNICATIONS INDUSTRY?

With nearly 50 million people trapped in modern slavery globally, including [41,000 Australians living in modern slavery every day](#), this isn't a distant problem. These significant human rights violations affect supply chains and businesses across all industries and are embedded in global networks, including the very industry we work in.

Telecommunications' global reach and complex supply chains provide exposure to significant unique industry risks. Forced labour risks are present across multiple aspects of the telecommunications industry. These include outsourced international workforces, such as customer service and call centres, misunderstanding of differences in international legislative contexts and inadequate oversight or protections. Any of these examples can leave workers vulnerable to exploitation. Similarly, construction and maintenance activities for data centres and network infrastructure may expose workers to unsafe conditions or exploitative practices.

The supply chain for telecommunications products, including smartphones and network equipment, also carries significant risks,

WHAT IS MODERN SLAVERY?

Modern slavery is a specific and grave violation of human rights, referring to the exploitation of individuals through forced labour or coercive conditions, denying them their freedom. It includes practices like human trafficking, forced labour, debt bondage, and situations where people cannot leave due to threats, violence, or manipulation.

While human rights ensure people's dignity, freedom, and fair treatment, modern slavery is the opposite—involving situations where people's freedoms are removed. An organisation's modern slavery risk refers to the potential for modern slavery to occur within its business operations or supply chain.

Effectively identifying, addressing and mitigating these risks is crucial for organisations in the telecommunications industry to support and respect human rights.

with conflict minerals and forced labour often implicated in the manufacturing process. Our impact on human rights, and in turn, our ability to do something to protect them, is significant.

Regulatory frameworks are tightening, and consumer expectations for ethical business practices are rising. Ignoring these issues can result in severe financial, legal, and reputational damage. There is always more we can do, and this Pathway demonstrates the simple, practical actions we can take to address these human rights abuses within our industry and organisations.

Proactively addressing modern slavery risks and respecting human rights strengthens the resilience of our organisations, enhances stakeholder trust, and demonstrates a commitment to ethical and sustainable business practices. This isn't only a matter of compliance; it's a way for companies to set new standards that safeguard dignity and fairness, shaping a world where everyone, from workers to consumers, benefit from responsible and transparent practices.

WHY DOES THIS MATTER TO YOUR BUSINESS?

Supporting human rights by addressing modern slavery risks is crucial to ensuring your business and our industry operate with deep consideration and respect for all people. It's also essential for building trust with customers and stakeholders by operating ethically and ensuring compliance with laws.

Given the interconnected nature of the industry's supply chains, telcos are well-positioned to lead by example, influence better practices, and collaborate with peers to mitigate risks. Committing to respecting and supporting human rights is the right thing to do and ensures we're contributing to a more ethical, fair and sustainable world. This commitment not only strengthens our business operations but also attracts ethically minded investors and talent, aligning with the broader mission of connecting and empowering communities.



Kristy Kelly

CEO, Telco Together Foundation

How it all fits together

As an industry with such a significant influence on human rights, we have a responsibility to do more. This Pathway represents a call to action; you can use it to support human rights and work to eliminate modern slavery in your organisation and the telecommunications industry.

As the means through which different sized businesses can respond to modern slavery risk varies, we have suggested steps for Small, Medium and Large Businesses to suit all capabilities:

1 SMALL BUSINESS

Less than AUD 10 million turnover
(e.g. niche tech service providers, subcontractors).

2 MEDIUM BUSINESS

AUD 10 million - AUD 50 million turnover
(e.g. regional infrastructure suppliers)

3 LARGE BUSINESS

Over AUD 50 million turnover
(e.g. national infrastructure contractors, international tech firms).



Roadmap



UNDERSTAND AND COMMIT TO HUMAN RIGHTS

Understand what human rights are and how they may be impacted, then make a formal commitment to how you will respect and support them in your business.

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TRAIN YOUR STAFF ABOUT MODERN SLAVERY RISKS

Knowledge is power. Empower your staff with education and tools to be alert and act on modern slavery risks.

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IDENTIFY RISKS AND ASSIGN RESPONSIBILITIES

Identify where modern slavery risks could be an issue in your operations and supply chain and assign roles and responsibilities for managing these risks.

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TRACK AND COMMUNICATE YOUR ACTIONS

Share your progress with customers, employees and suppliers, including what you've learned and achieved.

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MONITOR AND EVALUATE YOUR SUPPLIERS

Develop a process to demonstrate your expectations with suppliers, and ensure they operate in line with these throughout the life of the contract.

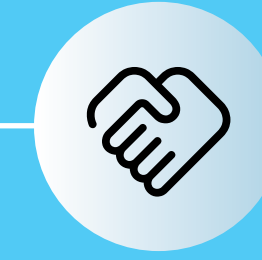
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ASSESS YOUR PURCHASING DECISIONS

Embed considerations of human rights and modern slavery risks into decision making and procurement, supporting businesses who prioritise responsible and ethical sourcing.

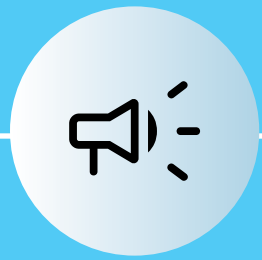
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BUILD RELATIONSHIPS ACROSS YOUR SUPPLIER NETWORK

Engage with your suppliers and partners to build trustworthy and transparent relationships, working together to manage and address risks.

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FOSTER A SPEAK UP CULTURE

Create a workplace culture where people feel supported and able to speak up, providing tools and processes to safely report risks and issues.

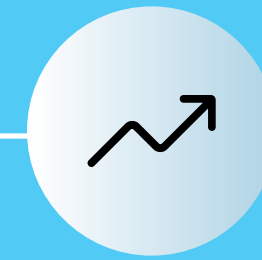
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RESPOND TO EXPLOITATION

Develop processes for acting on modern slavery occurrences, including clear steps to protect and support people who are at risk or affected.

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AIM FOR CONTINUOUS IMPROVEMENT

Don't just 'set and forget'. Review your plan regularly and make improvements as you gain insights and measure progress.

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Understand and commit to human rights

Context

Before you can act, you need to understand what human rights and modern slavery are and how they connect to what we do in telecommunications. From there, grasping big, sometimes distant concepts becomes easier, making them feel real and relevant.

Regardless of business size, it's essential to provide your team with clear, honest communications and training about what modern slavery is, how it impacts your business, and what you can do about it. With recent recommended changes to Australia's Modern Slavery Act 2018 (Cth), companies with an annual consolidated revenue between \$50 million and \$100 million should be prepared for the possibility of a lower reporting threshold in the coming years that may affect them. These recommendations underscore the growing expectation for smaller organisations to formalise their human rights and modern slavery risk management practices.

Once everyone understands where modern slavery risks might arise in their work, you can commit to act and collectively set a clear direction, showing that respecting people's rights isn't optional—it's a core part of how the telecommunications industry needs to operate. With this understanding, you can begin to integrate a consideration of human rights into your business and be able to communicate your commitments and progress.

Actions

SMALL AND MEDIUM BUSINESSES

Draft a formal human rights and modern slavery policy that outlines your commitments and practices that will support human rights in your organisation. For smaller organisations, this commitment could form part of a code of conduct or other ethical business policy, rather than creating a standalone policy. Engaging with a human rights specialist is advisable to understand your specific risks and obligations.

Raise awareness of modern slavery risks in the telecommunications industry, showcasing specific examples such as exploitation in subcontracted maintenance, forced labour in electronics manufacturing, and unethical recruitment in infrastructure projects. By highlighting these domestic and global risks, you can challenge the perceptions that modern slavery is a foreign issue.

Align human rights and modern slavery responsibilities with broader business objectives to help overcome resistance from stakeholders who view it as outside their core responsibilities. Consider embedding language about human rights and your response to modern slavery in company communications.

LARGE BUSINESSES

Highlight the business case for respecting human rights when engaging with stakeholders. The principle of doing well by doing good sums up how your commitment to human rights should align with broader business goals, including risk mitigation, reputation management, meeting regulatory requirements and sustainable business models that don't exploit people.

Create a modern slavery working group to foster shared ownership and responsibility, ensuring that modern slavery considerations are integrated across different business functions and with a focus relevant to your business from the outset.

Action in practice - Optus

A JOURNEY TO MITIGATING THE POTENTIAL FOR MODERN SLAVERY

Optus recognised that addressing modern slavery risks requires ongoing collaboration across the business. In 2020, the company established a cross-functional Modern Slavery Working Group, including senior stakeholders from Networks, Enterprise and Business, People and Culture (including Group Sustainability), Risk Management, Group Finance (including Legal and Procurement), Internal Audit, Customer Success (Retail and Customer Contact Centres) and Customer Solutions (Operations and Enablement). The working group is responsible for implementing and tracking the Modern Slavery Action Plan, which outlines key actions to strengthen Optus' response.

The group also monitors the effectiveness of these actions, shares lessons learned and identifies emerging issues. Key initiatives include enhancing staff training, incorporating modern slavery clauses in supplier contracts, raising awareness of the whistleblower hotline, and commissioning audits for high-risk suppliers. This collaborative group shares the responsibility and commitment to understanding modern slavery among the entire team at Optus.

Resources

- <https://humanrights.gov.au/education/human-rights-explained-fact-sheets>
- United Nations Global Compact (UNGC) guidance for how to develop a human rights policy ([OHCHR](#))
- The Australian Council of Superannuation Investment ([ACSI](#)) report provides recommendations to improve your modern slavery responses and reporting.
- For a basic policy framework, and guidance on communicating the policy: Walk Free Foundation - [Tackling modern slavery in supply chains. A guide 1.0](#)

✓ Checklist

- Have you discussed definitions of modern slavery and human rights with your employees?
- Has your commitment been adequately communicated internally and externally?
- Do you have a formal policy addressing modern slavery and human rights?
- Have you assigned responsibilities around human rights and modern slavery within your organisation, including across teams and leadership?

Train your staff about modern slavery risks

Context

You know how important human rights are and why it's crucial to act on modern slavery in your organisation and the telecommunications industry. Now it's time to share this understanding with your people so they are empowered with the knowledge and tools to make a positive impact.

Training your staff on modern slavery isn't a one-size-fits-all approach, and different teams have different responsibilities. Tailor training to ensure they can identify and manage risks within their areas of influence. In telecommunications, risks of human rights violations—including modern slavery—can arise in various parts of the business, such as procurement, customer service, and field operations. Roles like network engineers, network infrastructure planners, and leadership must understand these risks to make responsible decisions in supply chain management, contracting, and operational planning. With the proper training, everyone is empowered to address modern slavery risks.

Everyone has a role to play in addressing and acting on modern slavery. You need to be aware of the risks of modern slavery that impact your people, regardless of whether employed or contracted or where and how they work. You also need to be aware of the risks of modern slavery occurring in your supply chain.

Actions

SMALL BUSINESSES

Provide resources to your staff to support an understanding of human rights and modern slavery risks, and how they specifically relate to the telecommunications industry. These resources can be shared internally with staff via intranet and email, or externally with contractors, suppliers, and other stakeholders. If possible, you should also provide training to staff to support a basic understanding of modern slavery risks and human rights violations, with a specific focus on locally focused modern slavery risks that are most pertinent to your business.

Staff should be aware of the language used to discuss human rights and modern slavery, so introduce these through resources and training. This makes communicating easier, more inclusive and ensures your organisation and the telecommunications industry align on its understanding of modern slavery.

MEDIUM BUSINESSES

Develop comprehensive training on the concepts of modern slavery and human rights, including specific risks to your organisation, with a plan to deliver this to staff and contractors. Your people can have the most significant impact on identifying exploitation in operations and supply chains, so ensure training shows clear examples of what it looks like so they can recognise signs and act quickly.

To improve engagement and understanding, human rights training should include real life examples and risks in an Australian context to overcome perceptions of modern slavery being a foreign issue. They should also include specific risks to the telecommunications industry, such as forced labour in multi-tiered supply chains, conflict minerals in components, exploitation of migrant workers in network construction, unethical e-waste recycling practices, and labour abuses in outsourced call centres.

Empower your people to identify risks and report red flags with a clear understanding of the specific steps to take, appropriate reporting channels, and encouragement to report. Publish the process ensuring it is prominent and easily accessible, so everyone appreciates their role in upholding human rights commitments.

LARGE BUSINESSES

Implement human rights and modern slavery training-related KPIs to improve engagement and accountability with a plan to deliver updated training annually based on the latest insights and risks.

Incorporate targeted training for specific modern slavery risks in each role, including contact centre and offshore partner teams that manage high-risk supplier interactions. In some cases, teams may benefit from cross-functional training if modern slavery risks are relevant to their interactions, such as procurement and supplier relationships management teams. Demonstrate how cross-functional awareness improves risk management, sharing incidents and examples across teams and business functions.

After training, create pathways for open dialogue within your workplace so others can share knowledge internally. Support knowledge sharing across organisations with scheduled discussions about industry-wide modern slavery risks and responses.

Resources

- 🔗 [Australia's Supply Chain Sustainability School](#) offers free learning resources targeted at different parts of your organisation and supply chain
- 🔗 ['Bite-Sized Learning'](#) video resources from the UN Global Compact Network Australia
- 🔗 Australian Government – [Modern Slavery Resources and Educational Materials](#)
- 🔗 [Anti-Slavery Australia](#) has learning materials, resources and case studies of survivors

Action in practice - Telstra

TARGETED AND SURVIVOR-CENTRIC TRAINING

To ensure a tailored understanding of human rights and modern slavery, Telstra implements different types of mandatory training for its people. For a broader comprehension of human rights and modern slavery risks relevant to Telstra, a human rights module is included in the code of conduct training. Additionally, people with responsibilities relating to suppliers receive training on managing supplier risks, including labour rights risks, and those working in high-risk areas for modern slavery receive training on how to address these risks. After the initial training, Telstra provides staff with ongoing resources to manage supplier risks and refreshes training content alongside policy updates to ensure it remains relevant.

To engage its team, Telstra understands that modern slavery training must extend beyond compliance. Using a survivor-centric approach, they have integrated stories and insights provided by the Freedom Hub, an NGO working with survivors of modern slavery, giving employees a real-world understanding of these human rights abuses and their impacts on people. This approach to training allows the telco's employees to approach their responsibilities with greater empathy and responsiveness.

✔ Checklist

- Do your employees have easy access to resources to support an understanding of human rights and modern slavery?
- Have you provided role-relevant training to your team?
- Have you shared telecommunications specific human rights and modern slavery potential impacts and risks with your team?

⚠ Identify risks and assign responsibilities

Context

Before you can begin to manage your modern slavery risks, you need to identify where they might occur, including where and how your business might cause, contribute to, or directly link to human rights abuses. However, taking a broader approach to ensure your due diligence considers other human rights risks, such as fair wages, health and safety, discrimination, and freedom of association, is important.

In the telecommunications industry, these risks can appear at various points across your operations and supply chain, including:

- Materials such as cobalt or rare earth elements linked to forced labour
- Manufacturing of equipment in regions with weaker labour protections
- Outsourced call centres in high-risk geographies exposing workers to exploitative conditions
- Subcontracted field technicians in unsafe working environments or labour-intensive services such as installation and maintenance

Effective risk management depends on aligning ownership with the functions most capable of addressing each risk. Procurement teams, for example, play a critical role in vetting suppliers and ensuring compliance with ethical labour standards, while network planners must assess the social impacts of infrastructure projects. Product developers can focus on traceability of high-risk materials, and customer service teams can ensure that labour practices in outsourced operations meet fair standards. Ultimately, leadership teams are accountable for embedding human rights into governance systems, creating a culture that prioritises fairness and respect for workers.

Once you identify these risks, you can assign responsibilities for addressing and mitigating them. By assigning roles and building accountability into your operations, you mitigate risks and create a resilient, responsible organisation that supports fair treatment for all.

Actions

SMALL BUSINESSES

Review your operations and supply chain to map areas that might be at risk for modern slavery. This includes considering domestic operations, international supply chains, and partnerships, while accounting for the unique challenges posed by regulatory and operational contexts. See the Resources section on this page for guidance on how to do this.

Review other telecommunications businesses' modern slavery statements to see which risks they've identified and their approach to risk management. These are available at the [Modern Slavery Statements Register](#).

Allocate at least one person in your team dedicated to championing the respect of human rights and understanding your organisation's modern slavery risks and responsibilities.

MEDIUM BUSINESSES

Assign clear responsibility for addressing modern slavery within the organisation, including specific accountable representatives in your teams. Various individuals may be responsible for different modern slavery risks or parts of the risk management process. Allocate a cross-functional leader or team to champion the modern slavery agenda across all departments and facilitate a unified approach.

Prepare to scale your approach to risk management as your business grows and changes. Set regular intervals for reviewing your risk assessment approach to suit your business size, operations, and supply chain, and make changes as necessary.

LARGE BUSINESSES

Larger businesses may have obligations under the Modern Slavery Act, including annual reporting based on risk assessments. Seek professional advice to understand your obligations and ensure you're meeting them.

Conduct thorough risk assessments to identify areas of prioritisation in your supply chain and direct business operations. This assessment should map the risks in categories according to geography, industry, business models and vulnerable populations.

Identify which suppliers fall into the high or very high-risk categories and act accordingly, such as scheduling targeted audits and reviewing and refining the criteria for identifying high-risk suppliers as industry regulations and supply chain relationships change.

Action in practice - Superloop

CREATING A THOROUGH RISK ASSESSMENT FRAMEWORK

After a comprehensive risk assessment, Superloop established an Executive Committee on Modern Slavery composed of executives and senior leaders from procurement, risk and compliance, operations, and marketing departments. This committee oversaw and guided Superloop's anti-slavery strategy, ensuring alignment across all business functions.

Superloop also strengthened its approach to identifying modern slavery risks through structured supplier engagement and a systematic assessment of potential risk factors within its supply chain. They issued a modern slavery questionnaire to their top 70% of suppliers by spend, with plans to extend this to 80%, and integrated modern slavery questions into the onboarding process.

Superloop also evaluates suppliers based on specific risk categories, including country/region, sector, worker vulnerability, and recruitment practices. High-risk areas, such as ICT equipment, marketing merchandise, and logistics, are carefully monitored due to their potential exposure to vulnerable, low-skilled labour in high-risk countries.

With a structured risk assessment framework and reliance on industry and country benchmarks, Superloop leverages a range of resources and inputs to identify risks that are relevant to them.

Resources

- 🔗 Walk Free Foundation - [Tackling modern slavery in supply chains, A guide 1.0](#)
- 🔗 Australian Human Rights Commission and KPMG – [Property, Construction and Modern Slavery, Practical responses for managing risk to people](#)
- 🔗 Walk Free Foundation – [Modern Slavery Benchmarking Tool](#)
- 🔗 Responsible Sourcing Tool: [Supply Chain Mapping and Risk Screening](#)
- 🔗 UN Global Compact Network: ['Modern Slavery within Maritime Shipping Supply Chains' Guidance for Australian Businesses](#)
- 🔗 [Modern Slavery Risk Management](#): A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks

✔ Checklist

- Does everyone in your team understand specific roles and responsibilities for addressing modern slavery risks?
- Have you reviewed other businesses' modern slavery statements?
- Have you conducted a modern slavery risk assessment appropriate for your business size and operations?
- Are you meeting your obligations under the Modern Slavery Act?

Build relationships across your supplier network

Context

Modern slavery can occur at any tier of a business's supply chain, including within the complex, global supply chains typical of the telecommunications industry. Telco supply chains often involve sourcing critical components like semiconductors, rare earth minerals, and electronics assembly, all of which are high-risk for labour exploitation. Building reliable, trustworthy relationships with suppliers and working collaboratively with them to support how they manage these risks is essential.

These relationships are also crucial for sharing how your business approaches risk, including your expectations for transparency and accountability. You can create a shared commitment to improving conditions across the supply chain by fostering open exchanges of insights, challenges, and best practices. Conversations about modern slavery should begin early in supplier engagements and include what you are trying to achieve and expectations that any practices with a negative impact on workers will be reported. You and your suppliers should align on your commitments to respecting human rights and the expectations and obligations required to meet those commitments.

Although you can't have direct control over all aspects of your supply chain, fostering a culture of honest, ongoing dialogue on modern slavery can influence industry standards. For telcos, this may include promoting supplier capacity-building initiatives, encouraging the adoption of traceability systems for critical materials, and advocating for independent third-party audits to identify and mitigate risks. By leading through example, telcos have a unique opportunity to shape broader industry practices and inspire similar efforts across the global telecommunications ecosystem.

Actions

SMALL BUSINESSES

Regardless of business size, building supplier relationships with a shared commitment to respecting human rights is important. **For a small business, this can include:**

- Ongoing conversations about modern slavery risks and how they approach these in their operations and supply chain.
- A review of your supplier's publicly available information on modern slavery.
- An onboarding process that includes an initial touchpoint where you set your expectations for how the relationship will proceed and how you identify and respond to modern slavery risks.
- Asking new suppliers to share their process so you can better understand their approach to modern slavery.

Develop a declaration document or Supplier Code of Conduct that new and existing suppliers must sign as part of their agreements, including at renewal. This should be shared during your initial contact with suppliers so they're aware of your expectations. [The Electronics Watch Code](#) is a best practice guideline that sets standards for the production of purchased goods. Individual organisations can become affiliates of the Code, committing to exercise due diligence to ensure that all purchased goods are produced under conditions that conform with the listed standards.

MEDIUM BUSINESSES

Schedule an annual meeting with suppliers to share your resources and insights on modern slavery risks and impacts in your business operations or supply chain and invite them to do the same.

Create an engagement schedule to keep suppliers in the loop with new onboarding requirements, Supplier Code of Conduct updates, and new audit standards. As well as ensuring stakeholders are informed of significant changes, this ongoing, regular communication keeps an open dialogue about modern slavery risks.

Share industry-specific case studies and audit findings to improve engagement with suppliers.

Through insights learned, including how you handled grievances or measured compliance, suppliers can better understand your approach.

LARGE BUSINESSES

Developing a supplier engagement strategy that adapts to changing industry best practices and supplier feedback is the most proactive approach for achieving human rights objectives. Supplier relationships are constantly evolving, and so are the modern slavery risks that are relevant to you.

Keep an open dialogue with suppliers and partners to check their progress and encourage them to move beyond compliance when addressing modern slavery risks. Addressing modern slavery risks extends beyond meeting contractual obligations, especially as local requirements don't always align with international human rights standards and stakeholder expectations.

Use the results of your modern slavery risk assessment to identify high-risk supplier categories and strengthen these relationships. You can proactively address risks with your suppliers through targeted engagement strategies and continuous check-ins.

Resources

- 🔗 [Modern Slavery Risk Management](#): A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks
- 🔗 [ISO:20400 International Standard for Sustainable Procurement and how it can help you build supplier relationships, diversity and resilience](#)
- 🔗 Walk Free Foundation - [Tackling modern slavery in supply chains. A guide 1.0 – Chapter 5](#)
- 🔗 [Supply Chain Sustainability School](#), a free learning hub to support the creation of a more sustainable industry
- 🔗 Responsible Sourcing Tool: [sample code of conduct](#) and [sample supplier agreement](#)

Action in practice - Superloop

GAINING A THOROUGH UNDERSTANDING OF SUPPLIER NETWORKS

Superloop is dedicated to achieving a comprehensive understanding of its supply chain beyond Tier 1, with most of its network devices sourced from Australian entities and manufacturing primarily occurring in China, Thailand, and Vietnam. To ensure ethical supply chain practices, Superloop implements a vendor onboarding process that includes modern slavery questionnaires, detailed risk assessments, and comprehensive analyses. These assessments are informed by supplier-provided data and independent third-party evaluations, offering the telco confidence in the ethical integrity of its supply chain.

In addition, Superloop conducts thorough reviews of its vendors' and suppliers' operating locations, as well as risk assessments and the completion of Modern Slavery Questionnaires. Addressing modern slavery risks is a critical factor in determining a supplier's suitability as a trusted partner, and this process gives Superloop a thorough insight.

✔ Checklist

- Are you discussing human rights considerations during onboarding of new suppliers?
- Have you reviewed your suppliers' modern slavery risk approaches?
- Do you have an engagement strategy in place for consistent communications with suppliers?
- Do you have a tiered approach to suppliers based on risk level?

Assess your purchasing decisions

Context

The telecommunications industry relies on a complex supply chain, and risks arise in all elements of procurement, including suppliers, products, services, and locations. Telcos often source essential items and services such as fibre optics, semiconductors, electronic devices, data centre services, and installation contractors from regions with heightened vulnerability to modern slavery. Risks can also emerge from your service providers' subcontracting practices or using temporary and migrant labour in installation and maintenance roles.

Although it's important to consider other factors, such as costs and environmental impact, a thoughtfully developed procurement policy can support decision-makers to prioritise modern slavery. It can help to consider every purchasing decision as an opportunity to influence and collaborate with your suppliers, supporting each other to strengthen modern slavery responses in the telecommunications industry.

As modern slavery risks evolve, so must your purchasing decisions. Companies grow, shrink and change structure constantly, so having practices, systems, and processes that can adapt is essential. A consistent, company-wide approach that supports procurement decision making means it's easier to reinforce a commitment to human rights, even as your organisation changes.

Actions

SMALL BUSINESSES

Update your procurement process or policy to include steps that verify new suppliers based on their process to prevent and mitigate modern slavery before signing contracts and continue to do so during the contract term. Verification could include a desktop review of public information or requiring them to complete a questionnaire about their approach to modern slavery.

MEDIUM BUSINESSES

Establish a process to screen existing and new suppliers, with a schedule for recurrent screening throughout the relationship. **It may include:**

- Questionnaires about approaches to modern slavery risks.
- Incorporating steps into the procurement process to verify suppliers before and during contracts.
- Implementing grievance mechanisms for people across your operations and supply chain.
- Outlining minimum requirements on modern slavery within your contracts.

LARGE BUSINESSES

Implement metrics relating to human rights objectives to help establish expectations with suppliers and maintain accountability for their responsibilities. Explain these when commencing a new supplier relationship.

Prioritise your suppliers by risk level informed by inputs from a comprehensive modern slavery risk assessment. Subject higher-risk suppliers to a more stringent review process, including surveys to gain insights into their approach to modern slavery, third-party due diligence screening tools and platforms, and desktop or on-site audits.

Develop a management process to initiate should a supplier not meet your expectations on addressing modern slavery. The process should commence with support and training to assist them, and if necessary, be followed by specific consequences for ongoing or more significant breaches.

Action in practice - Aussie Broadband

UTILISING GOVERNANCE TO ADDRESS MODERN SLAVERY RISKS IN PROCUREMENT

Aussie Broadband follows a diligent supplier qualification process to ensure all procurement decisions are mindful of modern slavery and that discussions around modern slavery risks occur early in supplier relationships. To support employees responsible for vetting new vendors and to ensure they understand the specific risks of modern slavery relevant to them, Aussie Broadband delivers mandatory training linked to delegation of authority so that it informs all purchasing decisions made within the organisation.

As one of its most effective tools for assessing modern slavery risks with new vendors, Aussie Broadband has incorporated self-assessment questionnaires (SAQ) into the supplier pre-qualification process, mandating the completion of a satisfactory SAQ before suppliers can be entered into the central procurement databases. For one-off purchases from new suppliers, the completion of an SAQ is still strongly encouraged.

Once the supplier's SAQ has been reviewed, only specific team members with a delegation of authority and the required training can sign off on the new vendor. This approach ensures a comprehensive and closed-loop process for supplier qualification at Aussie Broadband and a better assessment of modern slavery risks for all purchasing decisions.

Resources

- 🔗 [Modern Slavery Risk Management](#): A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks
- 🔗 [NSW Anti-slavery Commissioner's Guidance on Reasonable Steps](#)
- 🔗 Australian Government – [Modern Slavery Model Contract Clauses](#)
- 🔗 Global Compact Network Australia – [Business integration of human rights due diligence in Australia: modern slavery and beyond](#)
- 🔗 [Responsible Sourcing Tool](#): Evaluating Labour Recruiters, Sample Supply Chain Due Diligence Program

Checklist

- Have you updated your procurement policy to incorporate modern slavery risk management?
- Do you have a screening process in place to identify higher-risk suppliers?
- Do you require new and existing suppliers to sign declaration documents or a Supplier Code of Conduct?
- Do you have a management process for suppliers who aren't meeting your expectations?

Monitor and evaluate your suppliers

Context

A commitment to more ethical purchasing decisions extends beyond the initial transaction or contract signing. It requires ongoing responsibility to ensure suppliers respect human rights and address modern slavery risks throughout your organisation's engagement with them. Through ongoing monitoring and evaluation, you can ensure your suppliers continue to align with your commitments and requirements, influencing better decisions within your organisation and across the broader telecommunications industry.

A supplier risk assessment framework is the first step for all business sizes, guiding the review and assessment of those in high-risk categories, with a more detailed framework required as the business grows. As each supplier presents unique risks that change over time, including geographic, ethical, and environmental, your assessment framework also needs to evolve.

Actions

SMALL BUSINESSES

Develop a schedule for monitoring and evaluating your suppliers, including regular checks throughout the life of the contract. **This could include:**

- Reviewing supplier contracts to ensure relevance and explicit mention of modern slavery.
- Ongoing discussions about modern slavery risks within your supply chain and operations and those of your suppliers.
- Monitoring of suppliers with third-party tools and resources to understand changing risks.
- Implementing human rights-related KPIs and prioritising suppliers who meet them, including disclosure requirements as part of contractual agreements.
- Requesting regular feedback from suppliers and third-party contractors to improve risk assessment, management and performance.

MEDIUM AND LARGE BUSINESSES

Complex supply chains and business operations require a comprehensive monitoring and evaluation framework, and more regular engagement with suppliers. **In addition to the steps suggested for small businesses above, this could include:**

- Refining audit and review mechanisms, including worker voice mechanisms, to ensure you capture relevant data and updates on modern slavery risks and approaches in your supply chain.
- Incorporating a criteria for performance improvements as a contractual requirement.
- Offering guidance to suppliers who may be falling short in their approach so they can address any issues.

- Developing a self-assessment tool or questionnaire for suppliers to complete at scheduled intervals so you can adapt your approach or contracts to suit their responses.
- Structuring a desktop risk identification process using inputs from third-party risk assessment platforms and supplier data to capture new risks and continually improve how you engage with suppliers and if processes are relevant.
- Scheduling supplier engagement meetings to understand their progress and updates on modern slavery risks in their operations or extended supply chains.

Action in practice - TPG Telecom

INNOVATIVE SOLUTIONS TO TRACK EVOLVING SUPPLIER RISKS

TPG Telecom recognises the complex environment the telecommunications industry operates within and the importance of maintaining continuous oversight of its supplier base to monitor the changing risk landscape. Sometimes, traditional methods like desktop reviews fall short of providing a complete picture, so TPG Telecom has adopted additional methods to enhance its risk assessment capabilities.

TPG Telecom implemented a technology-based due diligence platform to assess risk levels with their suppliers. The technology provides ongoing monitoring of high-risk suppliers, allowing the telco to respond promptly to emerging risks as they arise.

While valuable, TPG Telecom understands that technology alone has limitations. The platform requires human oversight to interpret which changes are meaningful and which may not impact the risk landscape. By using this tool as part of a broader, more comprehensive risk management approach, TPG Telecom combines innovative technology with in-depth human analysis to effectively monitor modern slavery risks within its supply chain.

Resources

- 🔗 Responsible sourcing tools: [sample supplier self-assessment](#), [monitoring labour recruiters](#), [conducting migrant worker interviews](#)
- 🔗 [ISO:20400 International Standard for Sustainable Procurement and how it can help you build supplier relationships, diversity and resilience](#)

Checklist

- Do you have a schedule for reviewing suppliers on their modern slavery response?
- Are you regularly refining audit and review mechanisms?
- Are suppliers required to complete a self-assessment questionnaire so you can keep track of their actions?

Track and communicate your actions

Context

Transparency, consistency, and accountability are essential for effective communication around modern slavery and human rights. Sharing actions and updates with your teams, suppliers, customers, competitors, and external stakeholders demonstrates your organisation's commitment to respecting human rights and helps to better manage modern slavery risks throughout your operations and supply chain.

Extending beyond simply meeting mandatory reporting requirements by voluntarily disclosing and celebrating your progress helps raise the standard for how the telecommunications industry communicates, and ultimately impacts, human rights.

Actions

SMALL BUSINESSES

Be specific about your actions to address modern slavery, including supplier audits, targeted risk assessments, and employee training. Communicate your progress on these actions in materials including company reports, websites, social media and tender responses.

Encourage your team to socialise your company's approach to modern slavery with customers and external stakeholders by empowering them with talking points to guide meaningful conversations. Using simple, clear language ensures everyone understands and feels comfortable discussing your commitment and progress.

MEDIUM BUSINESSES

When communicating your modern slavery response with suppliers, stakeholders, and employees, include case studies to demonstrate the relevance of what respecting human rights and addressing modern slavery risks looks like in the telecommunications industry.

Create a map of your target audiences, including stakeholders and employees, to ensure everyone understands and relates to your communications around modern slavery. Messaging should be targeted, relevant to each audience and use simple language to explain complex, technical topics.

LARGE BUSINESSES

Use automated systems to track progress on modern slavery goals and technology tools to provide insights to optimise your actions. As technology develops and these tools receive more inputs, their ability to identify modern slavery risks will become more accurate, and they can be a useful resource.

Make sure modern slavery is prioritised on the executive agenda and consistent progress updates are provided. Establish reporting systems for customers and suppliers at various stages of your projects and contracts, including processes for identifying and addressing risks and issues. Report your progress in compliance with the Modern Slavery Act. If you're not obligated to report under the Act, you can use it as a framework to guide your communication and updates.

Create a schedule for communicating progress, allowing greater transparency and consistency in how you discuss your modern slavery actions. Harness internal channels such as your intranet or company-wide emails to ensure the information is easily accessible by everyone across your teams. Externally, include a dedicated page on your website about your approach to human rights and modern slavery, and list your relevant policies.

Celebrate significant achievements, such as positive supplier audit outcomes, delivery of training programs, and meeting compliance targets like annual reporting under the Modern Slavery Act, to reinforce your commitment and demonstrate your actions.

Action in practice - Aussie Broadband

CLEAR COMMITMENTS WITH B-CORP CERTIFICATION

Aussie Broadband recognises the importance of a collective approach to addressing human rights abuses in the telecommunications industry and its supply chain, and actively collaborates with the Telco Together Foundation and its members to achieve this. In addition to sharing resources and best practice insights within our industry, Aussie Broadband is also a B Corp-certified organisation, publicly communicating its commitment to transparency and ethical practices, particularly in modern slavery risk management.

With a focus on accountability and continuous improvement, Aussie Broadband reinforces its dedication to high standards every three years through the B Corp recertification process. Most importantly, it publicly shares its strengths and areas for growth through the B Impact Assessment, improving communication and transparency with internal and external stakeholders.

Resources

- [Modern Slavery Risk Management](#): A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks
- [United Nations Guiding Principles Reporting Framework](#)

Checklist

- Can you clearly define the actions your organisation is taking to address and identify modern slavery risks?
- Do you consistently share your progress with internal and external stakeholders?
- Is your messaging around modern slavery and human rights communicated simply and effectively?

Foster a speak up culture

Context

Creating a culture where people feel safe and able to speak up about concerns surrounding human rights is critical to addressing them. This includes workers within your direct operations as well as your extended supply chain. In addition to promoting accountability, establishing and maintaining adequate reporting and grievance systems is vital.

For grievance and remediation mechanisms to be truly effective, people need to understand their rights as workers so they can determine whether they are being impacted. Once they possess this knowledge, training can ensure people know how and when to use grievance mechanisms. This delivers a more comprehensive understanding of the modern slavery risks within your operations and supply chain, providing a mechanism to address them.

Depending on the size of your business, the systems and tools you offer people will vary, and might be formal, informal or a combination of both, but fostering a transparent workplace culture supports speaking up, respects human rights, and ensures everyone understands their individual rights are essential.

Actions

SMALL BUSINESSES

Ensure your extended workforce, including those working in your supply chain and direct business operations, understand their rights as workers by publicly displaying these rights where they can easily access them. You can access information about these through free resources, including the Fair Work Australia's Protections at Work fact sheet. **Worker rights include:**

- No forced labour. People can freely choose to work or leave their work without threat of penalty or abuse.
- No worker should pay for a job. Employees are not responsible for paying fees and costs associated with employment or recruitment.
- Fair pay for work. Workers should be paid fairly without discrimination, and in accordance with local laws, including minimum wage and overtime obligations.
- No child labour. Workers should not be under 15 years of age or the local legal minimum age for work, and workers under 18 years should not perform harmful work or work that interferes with schooling.
- Freedom of association. All workers can choose to form or join trade unions, or engage or refrain from engaging with them.

All organisations must consider the diversity of their teams and supply chains when communicating about human rights, tailoring messages to account for cultural and language differences. This includes crafting messages that encourage people to raise concerns or report issues without fear of retaliation, especially when working with international suppliers. These reporting channels (often referred to as grievance mechanisms) should be clear, accessible, and designed to support transparency and trust.

MEDIUM AND LARGE BUSINESSES

Develop simple, easily accessible reporting channels for your employees and contractors, preferably with multiple reporting options. These could be in the form of an independent third-party hotline, an anonymous feedback portal using Google Forms, or via a tool implemented by your human resources representative.

Employees and contractors should understand the channels available for reporting modern slavery concerns, improving accessibility to these channels and encouraging people to feel comfortable using them. Educate everyone on how reporting works, including the specific pathways for formal and informal channels, the timeline for when to expect a response, and examples of reportable conduct or activities.

As you implement reporting systems and educate teams on how to use them, consistently reinforce that there will be no negative repercussions for anyone using these channels, as they are specifically designed to support and protect the people using them. People will be more likely to engage with grievance mechanisms or raise concerns about modern slavery or human rights abuses in the workplace if they feel safe and comfortable to do so and believe that their concerns will be addressed in a timely manner.

After implementing a reporting process, continue to refer to it, explaining its purpose and how it should be used. Grow awareness and adoption through regular training sessions and promote the reporting systems via internal channels, such as email signatures, the intranet and during team meetings.

Create a response plan to address the identified risks and issues. This plan should outline how the collected information will be processed, which stakeholders need to be informed, and your approach to reporting and remediation.

Establish a process for escalating reports and incidents and share it with your employees and contractors. All stakeholders should understand what steps an individual can take if the initial reporting response doesn't address their concerns, and what to expect next.

Resources

- 🔗 [Modern Slavery Risk Management](#): A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks
- 🔗 UN Global Compact Network Australia - [Effective modern slavery grievance mechanisms: a case study for business](#)
- 🔗 Guidance on implementing grievance mechanisms specific to property and construction sector: Property Council of Australia and KPMG - [Listening and responding to modern slavery in property and construction](#)
- 🔗 Property Council of Australia and KPMG - [Remediating modern slavery in property and construction](#)
- 🔗 UN Global Compact Network Australia - [Implementing effective modern slavery grievance mechanisms](#) - a guidance note for business
- 🔗 UN Global Compact Network Australia - [Effective modern slavery grievance mechanisms: a case study for business](#)
- 🔗 The Australian Red Cross [Work Right Hub](#) - provides support if you or someone you know is exploited at work in Australia.

Action in practice - TPG Telecom

IMPROVING AWARENESS AND ACCESS TO REPORTING

Understanding the critical need for a safe, accessible, and transparent method to report suspected instances of modern slavery, TPG Telecom launched several targeted initiatives. These included adding a modern slavery-specific reporting option to the company-wide whistleblower hotline, introducing an internal notification form specifically for modern slavery concerns, and establishing a modern slavery response policy and protocol.

To increase awareness and foster discussions about human rights, TPG Telecom participated in Anti-Slavery Awareness Week. Employees were encouraged to familiarise themselves with signs of modern slavery, and information about the company's reporting mechanisms was shared widely across internal communication channels with office screens displaying messaging ensuring resources were prominent and readily accessible. Additionally, modern slavery scenarios were integrated into TPG Telecom's Business Continuity Hypothetical Exercises, providing practical examples of identifying and reporting potential signs of exploitation.

Through this empathetic and accessible approach, TPG Telecom aims to make reporting modern slavery concerns straightforward and inclusive, ensuring all employees feel empowered to engage in the process should they need to.

Checklist

- Do you offer more than one channel for reporting concerns or issues around human rights?
- Are your reporting mechanisms confidential and accessible for your team and contractors?
- Have you developed and shared a process for reporting incidents, and responding, including escalation?
- Have you considered how to adapt your reporting mechanisms to suit the cultures and languages of people in your organisation and supply chain?
- Does your company's annual report include information about how to report a modern slavery breach and why it's important?

Respond to exploitation

Context

Being able to safely and effectively respond to concerns or reports around human rights is important, with the priority always being to protect and support the affected individuals. This process should include other initial measures before the response stage, such as early engagement with suppliers and internal training with your team to improve awareness of exploitation risks in supply chains and your direct operations.

An effective remediation system places the impacted individuals' dignity, safety, and rights at its core. To achieve this, organisations should adopt a survivor-centred approach that emphasises safety, transparency, and collaboration. Each remediation process should be tailored to the specific harm and context, aligning with international frameworks such as the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Although the process will be different for all businesses, responding to exploitation should follow the same basic principles. Aligning with the UNGPs, the following form the principles of an effective remediation system:

- **Prioritise Safety:** Safeguard rights-holders from further harm or retaliation while providing immediate access to necessary services, such as legal aid, medical support, and secure accommodation.
- **Ensure Transparency:** Maintain open communication with affected individuals and stakeholders, outlining clear steps, expected outcomes, and progress updates.
- **Empower Rights-Holders:** Uphold the agency of affected individuals by actively involving them in decisions about their remediation.
- **Prevent Recurrence:** Address root causes of harm through corrective action plans and systemic changes to policies, practices, or supply chains.
- **Collaborate Effectively:** Work with civil society organisations, trade unions, and other partners to enhance remediation effectiveness and ensure impartiality.

By embedding these principles within business practices, your organisation will be best placed to remedy past harms and contribute to preventing future exploitation.

Actions

SMALL BUSINESSES

Establish clearly defined roles and responsibilities within your organisation and specific teams so that everyone understands their role in responding to concerns or reports of exploitation.

A small business responding to modern slavery should adopt a framework that prioritises protection of affected individuals while engaging responsibly with suppliers. Avoid immediate disengagement, as this can worsen conditions for workers. Instead, seek expert guidance from organisations like the NSW Anti-Slavery Commissioner, the Red Cross, or worker rights NGOs to understand the best course of action. If the supplier is willing to cooperate, work with them to develop a corrective action plan that prioritises worker protection. If they are uncooperative, escalate the issue to relevant authorities and consider phased disengagement while ensuring worker safeguards. Strengthen internal policies, supplier contracts, and training to prevent future exploitation.

MEDIUM AND LARGE BUSINESSES

Develop and publish an outline of response protocols so everyone can act quickly and consistently when exploitation cases arise. These clearly defined protocols should also extend to suppliers, with the development of situation-specific response frameworks for cases that occur with suppliers.

Provide your suppliers with resources to help them identify and report issues and industry-relevant case studies. This can strengthen your supply chain's response. You can set expectations through contract clauses or your supplier Code of Conduct that compel suppliers to adopt more robust remediation measures to be more proactive and accountable.

Review your response annually to ensure your protocols remain effective and aligned with evolving risks, using feedback from incident cases, reviews of remediation approaches, and supplier feedback on previous cases.

Action in practice - Optus

AN EVOLVING RESPONSE TO EXPLOITATION

Being able to quickly and effectively address concerns about incidents in its operations and supply chain is vital for Optus, and it recently improved its Modern Slavery grievance response guidelines to ensure this. With various channels such as site audits, media monitoring, and a whistleblower hotline, Optus can quickly detect concerns of human rights issues, with any reports triggering a systematic investigation.

Any grievances made through the Optus Whistleblower hotline are investigated by an independent party and if verified, Optus' process is to collaborate with key stakeholders and commence remediation. Optus integrates the lessons learned into its policies and processes, so these response guidelines and remediation actions evolve.

This layered approach makes Optus more effective at responding to modern slavery risks and safeguarding human rights across their complex supply chain.

Resources

- 🔗 [Modern Slavery Risk Management: A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks](#)
- 🔗 [Property Council of Australia and KPMG: Remediating modern slavery in property and construction](#)
- 🔗 [Walk Free Foundation 'Modern Slavery Response and Remedy Framework'](#)
- 🔗 [Guidance on implementing grievance mechanisms: Oxfam and Reckitt – Grievance Mechanisms Toolkit](#)

Checklist

- Have you developed and shared your process for responding to exploitation?
- Does everyone understand their responsibilities in reporting and responding to instances of exploitation?
- Do you have a schedule for reviewing and updating this process?

Aim for continuous improvement

Context

To effectively support human rights, organisations should continually strive for improvement. This can be achieved by being aware of what your peers are doing, collaborating with partners, suppliers, and government, considering thought leadership from experts, aligning with international standards such as the UNGPs, and engaging with rights-holders such as supply chain workers.

Importantly, goals should continually adjust to meet evolving regulations and changes in the business environment. We cannot work to end modern slavery with a set-and-forget approach; human rights violations require a constant, proactive approach that continuously improves. By setting goals and creating a plan for how your organisation will improve its response to modern slavery risks, you can remain proactive.

Actions

SMALL BUSINESSES

Schedule an annual meeting with your organisation's modern slavery representative, working group, executives, and other relevant team members to discuss your actions and progress in addressing modern slavery risks and what you'll do to improve over the next 12 months. With a combination of short and long-term goals within human rights frameworks and measurable outcomes for each milestone, you can track your progress and make necessary changes.

Adopt a company-wide attitude of continuous improvement. Modern slavery risks and impacts, and our understanding of them, are constantly changing, and your approach needs to as well. Through measures like rethinking best practices and encouraging teams, external stakeholders and contractors to recommend improvements, your processes can be responsive to new risks.

MEDIUM BUSINESSES

Schedule a review cycle where policies and procedures are updated and refined to address human rights violations more effectively based on supplier feedback, recent incidents, and input from employees and other stakeholders.

Be proactive and update these if any operational, supplier, or legislative changes occur before your annual review is due, or if learnings from an occurrence can immediately mitigate future potential instances.

Reflect new learnings or insights during staff training to ensure people receive the most current information on modern slavery risks. After delivering initial training, hold annual refresher courses to ensure human rights and addressing modern slavery remains top of mind and that your information is relevant.

LARGE BUSINESSES

The telecommunications industry shares many suppliers and customers, so leveraging industry alliances, such as Telco Together Foundation, allows you to exchange insights and influence continuous improvement. Schedule regular discussions with other organisations in the industry to collaborate on your approach to modern slavery, being mindful of the industry's Competition Law.

Implement periodic benchmarking within the telecommunications industry and others to identify new strategies and fill capability gaps. Conduct desktop research of other organisations by reviewing modern slavery statements and external communications to identify measures to improve your own response.

Supply chains evolve constantly, so prioritise a periodic assessment of high-risk suppliers and harness the power of regular audits and due diligence processes as needed. Maintaining adaptable supplier engagement strategies makes it easier to respond to emerging risks and regulatory changes.



Action in practice - Telstra

ENGAGING RIGHTS-HOLDERS TO DIRECT CONTINUOUS IMPROVEMENT

To ensure a robust, relevant and continually evolving approach to modern slavery, Telstra actively engages with targeted supply chain workers through anonymous worker voice surveys. These easily accessible online surveys ask workers about their working conditions, including hours, wages, grievance mechanisms, and overall job satisfaction.

Using the results, Telstra collaborates with suppliers to address any concerns raised. This worker-centred approach addresses immediate concerns and informs Telstra's broader risk management process. Incorporating feedback from the rights holders allows Telstra to continuously improve and adjust its risk management process to reflect the needs and experiences of the workers it seeks to protect.

Resources

-  United Nations: [Guiding Principles Reporting Framework](#)
-  Queensland Government: [Continuous improvement supplier guide](#) (toolkit and other resources)
-  Australian Government Attorney-General's Department: [Modern Slavery Act supplementary guidance](#)
-  Monash University: [Modern slavery disclosure quality](#) (report and guidelines)
-  Property Council of Australia: [Improving modern slavery statements in the property sector](#)
-  UNSW Australian Human Rights Institute: Strengthening modern slavery responses: [Good practice toolkit](#) (toolkit and case studies)
-  The Business & Human Rights Resource Centre: [UN Guiding Principles on Human Rights](#) (guidelines)

Checklist

- Do you have an annual meeting scheduled to report on progress and planned improvements?
- Is staff training updated so everyone is aware of new modern slavery risks?
- Are you regularly reviewing other telcos' responses to identify your capability gaps?
- Do you collaborate with others in the industry to share insights and learnings?

4.0 CONCLUSION

Respecting human rights and addressing modern slavery is an ethical obligation and a strategic imperative for telecommunications companies. With human rights violations deeply embedded in global supply chains, including those within our industry, your organisation must take proactive steps to ensure dignity, fairness, and safety for all individuals involved in your operations and supply chain. By committing to respecting human rights and eliminating modern slavery, you are proactively protecting vulnerable people.

Our industry's global reach and interconnected supply chains provide a unique ability for us to drive positive change and influence better practices across the value chain. This responsibility is not only about adhering to regulatory requirements but setting a new standard that reflects your organisation's values and strengthens relationships with customers, partners, employees, and communities. By prioritising human rights, your organisation can mitigate risks and create a fairer and more just world for everyone.



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