



## THE BAI COMMUNICATIONS GROUP

### Modern Slavery Statement for Financial Year 2021-2022

This Statement is made by the BAI Communications Group holding company Frequency Infrastructure Australia Holdings Pty Ltd under the Australian *Modern Slavery Act 2018 (Cth)* on behalf of each of the Group companies covered by this Statement and BAI Communications Limited under the United Kingdom's *Modern Slavery Act 2015*. This Statement sets out the steps that BAI Group companies have taken and are continuing to take to ensure that modern slavery is not taking place within our operations or supply chains.

#### Statement from Igor Leprince, Group CEO

"Modern slavery encompasses slavery, human trafficking, servitude and forced labour. The BAI Communications Group respects and supports human rights. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting appropriate and effective systems and controls in place to reasonably safeguard against modern slavery occurring within our business or supply chains. We are working to identify and address these practices if they occur, through due diligence and risk management processes, and maintaining a culture that encourages people to speak up when something is not right. During the past 12 months, we did not identify any instances of modern slavery occurring in our operations or supply chains."

#### Our Structure

The following Group companies: (each a "Company" and collectively "BAI Group") are covered by this Statement:

Australian Incorporated	Other Incorporated
Frequency Infrastructure Australia Holdings Pty Ltd (Ultimate Holding Company)	BAI Communications Limited (UK)
BAI Communications Holdings Pty Ltd	BAI Communications Europe Limited (UK)
BAI Communications Pty Ltd	Transit Wireless LLC (US)
BAI Critical Communications Pty Ltd	BAI Communications Inc (Canada)
Digital 4 Pty Ltd	BAI Communications Limited (Hong Kong)
BAI Communications Networks Pty Ltd	BAI Communications Holdings III, LLC (US)

#### Frequency Infrastructure Australia Holdings Pty Ltd (FIAHPL)

The BAI Communications Group includes operating companies in each of the Group's major markets including Australia, the United States, United Kingdom, Canada and Hong Kong.

Frequency Infrastructure Australia Holdings Pty Ltd is an Australian proprietary company limited by shares and is the Ultimate BAI Communications Group Holding Company. FIAHPL was incorporated in Victoria, Australia on 28 March 2009 and its registered office is at Level 10, Tower A, 799 Pacific Highway, Chatswood, New South Wales 2067, Australia.

BAI Communications Limited is the Group's operating company in the UK and was incorporated in England and Wales on 30 March 2016. Its registered office is at Level 2, 2 Kingdom Street, London W2 6BD, United Kingdom. BAI Communications Europe Limited is the holding company for BAI Communications Limited.

Transit Wireless LLC and BAI Communications Holdings III, LLC (and its subsidiaries), BAI Communications Inc and BAI Communications Limited design, build and operate telecommunications infrastructure in the United States, Canada and Hong Kong respectively.

The BAI Communications Group has an annual turnover in excess of A\$100m and has approximately 748 employees worldwide.

## Operations

The BAI Communications Group is a global telecommunications infrastructure owner and operator. In a world where connectivity is essential to our daily lives, the BAI Communications Group designs, builds and operates communications infrastructure – cellular, Wi-Fi, broadcast, radio and IP networks – connecting communities around the world. Our state-of-the-art robust communications systems enable government authorities, public safety and emergency services organisations and other businesses and their customers to stay connected and productive by reducing costs and unlocking new revenue streams.

In Australia, we own and operate one of the most extensive broadcast transmission networks in the world, providing a range of services to TV and radio broadcasters nationally delivering 59 million broadcasting hours to 99% of the population. In times of crisis, national broadcasters rely on BAI to maintain the connection with Australians, and emergency services rely on us to help keep them informed.

In the US, we operate communications networks deployed in transit systems including the subway in New York (through our majority owned Transit Wireless business) and we design and build telecommunications infrastructure designed to improve wireless service at large venues across all major industries including sports and entertainment, real estate, hospitality, education, healthcare, government and transportation (through our majority owned Mobilitie business).

In the UK, we were recently awarded a concession from Transport for London to deploy wireless coverage in the London Underground and small cell and other wireless network infrastructure throughout London.

We also deliver high-quality communications infrastructure to other large-scale transit systems, provide tower and fibre co-location services for wireless carriers, service providers, enterprise and public sector customers and operate and maintain critical communications networks.

## Our Supply Chains

Each Group Company operates a preferred supplier policy. Due diligence is conducted on all suppliers in accordance with each Company's procurement policies before approving them to become a preferred supplier.

In Australia, we engage approximately 1,600 external suppliers for the delivery and maintenance of our operations. Our assets are spread across remote, regional and metropolitan areas throughout Australia. We engage most significantly with small and medium size enterprises and local service providers that are located close to our facilities. The following is considered when allocating work to service providers, purchasing and hiring equipment and other goods:

1. Appoint local individuals to provide "first in maintenance" services for all sites;
2. Where possible, for site works required at regional and remote locations, works should be awarded to regional and remote based SMEs; and
3. Purchase of consumables to be completed within the local area

In the United Kingdom we provide high-quality communications infrastructure in large-scale transit environments and provide communications infrastructure solutions more broadly including to support the

creation of “smart cities”. We have established communications infrastructure businesses in the US conducted through our Transit Wireless and Mobilitie businesses and in the other markets that we operate in.

Our key suppliers are long term stable partners in the areas of broadcast and telecommunications network equipment; information technology hardware, software and services; construction and maintenance services; and general business consultancy services. These suppliers are located predominantly within Australia, Europe, the United States, Canada, United Kingdom, China, Japan, South Korea, the Philippines, India and Hong Kong.

Supply Chain Origin:

Equipment/Component Providers	Local Amenities (eg. Cleaning/Security)	Local Service Providers	Off-Shore Services
China	Australia	Australia	India
USA	UK	UK	Philippines
Australia	USA	USA	UK
Japan	Canada	Canada	Australia
South Korea	Hong Kong	Hong Kong	USA
Spain			Canada
Germany			Hong Kong
Italy			

To ensure organisations involved in our supply chain and operations comply with our values regarding modern slavery, we have in place a supply chain compliance program. All suppliers are pre-qualified prior to appointment and submission of purchase orders via our supplier pre-qualification assessment procedures and questionnaire. Our compliance program consists of:

1. Utilising internal resources where appropriate prior to going to market for external suppliers;
2. Adhering to our procurement processes to ensure that suppliers are adequately vetted, eg. through the completion of Supplier ISO Accreditation and Management Systems;
3. Conducting supply chain mapping and risk analysis appropriate for the supplier and when required by local laws;
4. Requiring our key suppliers to comply with our Code of Conduct and, where modern slavery laws are applicable for those suppliers that are considered to be high risk, provide a copy of their Modern Slavery Statement published under their relevant jurisdictional legislation; and
5. If the above is not available, suppliers completing a Modern Slavery Declaration.

Our Code of Conduct exemplifies our commitment to responsible business practices and sets out our expectations for how our employees, contractors and suppliers should act.

**Risks of Modern Slavery in the Group’s Operations and Supply Chains**

We have completed a supply chain risk assessment identifying four key supply areas where there is considered to be some level of modern slavery risk:

1. **Offshore services:** IT support based in higher risk geographies., e.g., India and the Philippines;

2. **Local service providers:** considered to be low risk partners as our practice is to use suppliers with transparency of labour rates and where workers compensation arrangements are required;
3. **Equipment Suppliers:** Manufacturing and supply of broadcast/network equipment and components; and
4. **Local Amenity Suppliers:** Contractors involved in site maintenance activities e.g., Cleaning.

Modern slavery risks exist in IT support-based services, the supply chain origin of equipment components and amenity related services. These areas present the greatest risk in our supply chains and are therefore our greatest priority in assessing and de-risking.

Our practice for these suppliers is to obtain their Modern Slavery Statement where modern slavery laws are applicable. If not applicable, we ask them to complete a Modern Slavery Declaration to identify any potential risks in their supply chains. Additionally, and in particular for supply of equipment, our policy is to seek wherever possible to minimise contracting tiers to reduce the number of contracting parties and focus efforts to ensure the modern slavery practices of those parties are sound.

When considered appropriate, training is provided to our key suppliers to ensure they are informed and are aware of their legal obligations.

### Our Policies

The BAI Communications Group has in place at a Group level and for each of our operating companies a number of policies to ensure we conduct business in an ethical and transparent manner. These include:

1. Procurement policies that establish ethical sourcing principles that are implemented through a Supply Chain Management Plan that ensures goods and services are procured within a structured, ethical and competitive process;
2. We operate robust recruitment policies, including conducting eligibility to work in country checks, for all employees to safeguard against human trafficking or individuals being forced to work against their will;
3. We have a Whistleblowing framework in place and we provide individuals in all of our businesses with access to an independent third party whistleblower hotline where all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal; and
4. Our Code of Conduct sets out the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Key Supplier Contracts

Our Legal Team has conducted a review of relevant Companies' key internal precedent supplier contracts and updated them to include relevant and appropriate modern slavery clauses providing obligations on key suppliers to ensure they comply with modern slavery legislation.

Where a Company enters into contracts prepared on third party contract terms, our practice for relevant Group companies is to ensure such contracts contain relevant and appropriate provisions that include obligations on third party suppliers to ensure they comply with modern slavery legislation. Where modern slavery laws are applicable, we also require suppliers confirm that they have taken appropriate steps to reduce the risk of modern slavery occurring within their business and that they hold their own suppliers to account over modern slavery.

### Training

We provide training to Company employees and contractors as follows:

1. All employees are required to comply with our Code of Conduct that sets out the minimum ethical standards expected of employees, contractors and suppliers;
2. All employees must complete an online corporate induction to ensure they understand the Code of Conduct and are made aware of our policies; and
3. A modern slavery e-learning module has been developed to raise awareness about our approach to ensuring it complies with its legal obligations. All relevant employees will complete this training bi-annually with initial training to be completed by 30 June 2022.

#### How we assess the effectiveness of the above actions

We use the following key performance indicators to measure how effective our programs to mitigate the risks of modern slavery occurring in our business:

1. Completion of internal audits by our Risk and Compliance Team (modern slavery is included in every internal audit scope and reviewed where applicable);
2. Modern slavery is discussed during periodic risk workshops with relevant business and support functions such as Procurement, Supply Chain, Legal and HR;
3. Our Group HR function ensures that all BAI Group employees are paid at or above minimum wage levels in each of the countries in which the BAI Group operates;
4. Appropriate communication with the next link in the supply chain for goods and services in our business to ensure their understanding of, and compliance with, modern slavery legal obligations; and
5. Completion by relevant employees of training modules.

We will take such further steps as are reasonably necessary and appropriate to combat the risk of modern slavery in our business. Over the next year, our focus will be on rolling out training modules to relevant Group employees and continuing to update our contractual arrangements with suppliers to include modern slavery-specific provisions where applicable.

#### Consultation Process

Over the last financial year, we have established a working group of stakeholders from our Legal, HR, Procurement and Risk and Audit Teams to examine existing systems and processes we have in place and to introduce new systems and processes to assess and address the risks of modern slavery in the operations and supply chains of our Group companies. We have consulted across each of the Group Companies in relation to this Statement.

This Statement is made pursuant to the Australian *Modern Slavery Act 2018* and the UK's *Modern Slavery Act 2015* constitutes our anti-slavery and human trafficking statement for the current financial year.

### Approval for this Statement

This Statement was approved by the Board of Directors of  
Frequency Infrastructure Australia Holdings Pty Ltd on **14** December 2021

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Alex Karroum  
Director

This Statement was approved by the Board of Directors of  
BAI Communications Limited (UK) on **24 January 2022**



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Igor Leprince  
Director and Chairman