



TECHNOLOGY & INFRASTRUCTURE



**MODERN  
SLAVERY  
STATEMENT  
2024**



## INTRODUCTION

*Modern slavery is the serious exploitation of people, including forced labour, debt bondage, human trafficking and slavery, which undermines or deprives them of their freedom. Modern slavery is a global problem that is estimated to violate the fundamental human rights of around 50 million people through situations of exploitation, threats, coercion and deception.*

CPS Technology & Infrastructure Pty Ltd ACN 148 905 159 ('CPS', 'we', 'us' and 'our') has substantial experience in performing and managing complex, end-to-end delivery of telecommunications and infrastructure for a broad range of customers. We deliver transparent, seamless and cost-effective projects from concept through to handover. Our vision is to be the leading enabler of technology, connectivity, and innovation that ultimately improves productivity, life, and leisure in Australia.

This modern slavery statement covers CPS and is made pursuant to the *Modern Slavery Act 2018* (Cth) (the Act). CPS is an Australian entity with an annual consolidated revenue of at least \$100 million and is therefore deemed a 'reporting entity' under the Act. This statement covers the reporting period from 1 July 2023 to 30 June 2024. This is CPS' first statement in relation to modern slavery.

At CPS, we understand that modern slavery is a complex issue, and it is further acknowledged that the nature of our business in the telecommunications industry means we are exposed to potential modern slavery risks across our operations and supply chain. CPS is committed to developing an understanding of the modern slavery risks in our business and taking action in responding to this problem. This modern slavery statement details the steps we have taken to identify and address the risks of modern slavery in our operations and supply chain and assesses the effectiveness of the actions taken.

## MESSAGE FROM OUR EXECUTIVE CHAIRMAN, SCOTT MUNRO



At CPS, our core company values of integrity, accountability, tolerance, and humility are embedded in our interactions with employees, suppliers, and stakeholders, as well as in how we run our business. We are dedicated to fostering a workplace that upholds human rights, equality, and diversity, as we believe every individual deserves the right to live their lives autonomously, safely and with respect.

CPS is devoted to safeguarding human rights and acknowledges the complexity and evolving nature of modern slavery. To actively combat all forms of modern slavery within our operations and supply chain, CPS is committed to continuous learning and strict compliance with modern slavery laws and Government mandates, policies and initiatives.

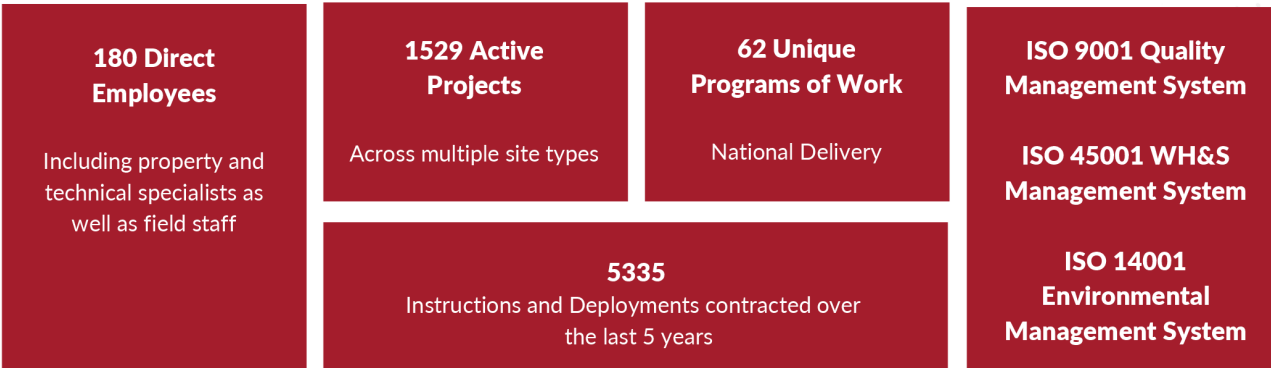
We have identified several priority areas for the next 12 months, as outlined in this statement. These areas will help us remain focused and accountable, establishing processes and procedures to identify and manage modern slavery risks and to assess the effectiveness of our actions.

I am proud to share with stakeholders our commitment to reducing modern slavery risks while recognising that we require a culture of continuous improvement over the coming years. We intend to work in partnership with our suppliers, employees, business partners, and other stakeholders to promote ethical practices that reduce the risks of modern slavery in our operations and supply chain.

A handwritten signature in black ink, appearing to read 'Scott Munro'. The signature is fluid and cursive, written over a light grey circular watermark or background element.

Scott Munro  
Executive Chairman  
CPS Technology & Infrastructure Pty Ltd

## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN



### 2.1 STRUCTURE

CPS was established as a company in 1992 and is one of Australia's most experienced and trusted, high-volume end to end telecommunications and infrastructure deployment partners. Our mission is to apply best practice to support the wider technology and infrastructure sectors to deliver superior outcomes for stakeholders and customers.

Our registered office is located at Suite 1003, 1 Newland Street, Bondi Junction NSW 2022. For the majority of the reporting period, CPS was owned by a single private Australian shareholder, however in June 2024 a transaction was completed which led to a change in control of CPS. As a result of this transaction, CPS Holdco Pty Ltd is now the ultimate parent company of CPS, with CPS Bidco Pty Ltd as a subsidiary of CPS Holdco Pty Ltd being the immediate parent company of CPS.

### 2.2 OPERATIONS

CPS has circa 180 employees, who are based in Australia and the Philippines. The majority of our employees work nationally across Australia, however we also encourage flexible work practices which enables our employees to work remotely from home or site, as may be dictated by their role and responsibilities from time to time. Our Australian operations are spread geographically across the country, as a result of consumer demand for connectivity and the need for strengthened telecommunications infrastructure in remote and regional communities. Due to these factors, we are seeing a steady increase in the need for our employees to support customer projects in remote and regional locations as well as in metropolitan areas.

We predominantly conduct our business operations in Australia. However, CPS has limited offshore operations in the Philippines, and we rely upon two key specialist third party contractors (out of our 430-supplier base) for niche design services who are based in Macedonia and India.

CPS currently performs over 1500 high volume, fast paced, telecommunications and infrastructure micro projects for multiple customers. We perform Site Acquisition, Environmental Planning, Radio Frequency Planning, site telecommunications design, civil and technical construction, technical integration of active equipment, and active network performance and optimisation services.

Most customer projects are delivered in house using our full-time employees, particularly in relation to Site Acquisition, Environmental Planning, Radio Frequency Planning, and site telecommunications design services. CPS engages suppliers for 10% of these activities under negotiated Framework Agreements with preferential terms and conditions. For technical integration and specialist construction services, 20% of these services are conducted by our full-time employees, whilst 80% are largely managed via rigorous subcontractor engagements.

Where possible, CPS seeks to only utilise trusted long-term suppliers in relation to high-risk activities, and these subcontractors are engaged under appropriate framework agreements. However, due to the vast geographic diversity in the projects we support for our customers, there are times where we are required to engage smaller local suppliers. These are predominantly low risk activities to ensure the integrity of the projects and related deliverables are met. Due to the maturity of these smaller suppliers, CPS may engage them under lighter touch contract terms.

## **2.3 SUPPLY CHAIN**

CPS procures a range of goods, software and services which are consumed within our internal operations, as well as passed through to our customers as project deliverables. CPS had approximately 430 suppliers in the reporting period, however 60% of CPS's external spend was represented by only 20 suppliers in the same period.

Where possible, CPS seeks to contract with Australian entities only, however there are circumstances where suppliers may have manufacturing operations, or a parent company based offshore. On this basis, almost all spend in the reporting period was in Australia.

Goods, software and services acquired to support CPS internal operations relate largely to the internal workforce. These are comprised of property and related services, IT systems and infrastructure and professional services. It should be noted however, that these costs represent only a relatively small portion of the CPS supply chain. The largest contributors to the CPS supply chain are services and goods acquired to directly support customer projects.

These goods acquired for customer projects include, steel telecommunication poles and towers, prefabricated outdoor shelters, cabling and peripheral telecommunication equipment. Much of the steelwork and shelters that CPS acquires are manufactured in Australia. However, some components we are required to procure are manufactured overseas, predominantly in China. It must be noted that CPS customers often dictate the suppliers from whom we must acquire certain equipment and materials, and those parties are subject to rigorous policies and procedures, including codes of conduct to prevent modern slavery risks.

Technical integration and specialist construction services represent a large proportion of the services that CPS contracts through its supply chain.

### **3. MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN**

At CPS, we acknowledge that modern slavery risks can arise in our operations and supply chain due to country and industry specific modern slavery risk factors.

#### **3.1 RISKS IN OUR OPERATIONS**

##### **Direct workforce onshore:**

CPS employs several technicians and rigging employees who reside domestically in Australia and the workforce composition at CPS is Australian based. According to the Global Slavery Index, the risk of modern slavery in Australia is lower than many other jurisdictions.

However, due to the specialist nature of these roles, there is a labour shortage. We encountered difficulty placing local telecommunications riggers in Australia during the reporting period. CPS therefore sponsored two employees to move to Australia from the Philippines to fill these vacancies. CPS has helped fund the visa costs of personnel where necessary to facilitate their move to Australia to ensure they are not financially burdened by the relocation process.

We ensure that these employees are paid competitive salaries in line with their relevant award.

##### **Direct workforce offshore:**

CPS employs a select number of design, administrative and support employees in the Philippines via a local Australian service provider. The framework agreement between the parties, ensures all employees are remunerated in accordance with local legislation and regulations at a minimum and employees are entitled not to work their own local public holidays.

As per the Walk Free 2023 Global Slavery Index, the Philippines is outperforming its regional counterparts in its efforts to address modern slavery, and the Philippines government had the second strongest response to modern slavery in the Asia Pacific region.

## 3.2 RISKS IN OUR SUPPLY CHAIN

### Indirect workforce onshore:

CPS understands that the largest cost and risk within our supply chain relates to the construction, logistics and facilities management services that we acquire and utilise. It is understood that within these industries, there is a reliance upon manual, low skilled workers and therefore these individuals are more vulnerable to potential modern slavery practices.

It is therefore necessary for CPS and its suppliers to ensure that a best practice WH&S framework is in place to protect these individuals. CPS is currently certified to ISO45001 and holds a WH&S accreditation from the Office of the Federal Safety Commissioner.

As the services that CPS acquires are almost exclusively onshore in Australia, we believe this poses a lower modern slavery risk, given the robust workplace relations legislation which governs the way we operate.

### Goods and Materials:

CPS acknowledges that our supply chain includes the procurement of goods and materials from large and offshore manufacturing plants that have a higher risk of modern slavery. This is based on the geographic locations and/or industry sectors in which these suppliers operate. For example, these suppliers may rely on low skilled, lower wage workforces working within a hazardous environment. This may occur in countries with a higher modern slavery risk, in particular renewables, such as solar panels and batteries are of concern due to raw material extraction.

To mitigate this risk, CPS imposes contractual obligations on the suppliers we procure these goods and materials from to comply with modern slavery requirements. This occurs by requiring compliance with our supplier code of conduct as well as including appropriate modern slavery provisions within our agreements with these suppliers. We acknowledge that these suppliers and their supply chains will continue to require ongoing engagement to ensure that modern slavery risks are identified, assessed and addressed.

## 4. Assessing and addressing our Modern Slavery Risks

CPS is committed to taking steps to assess and address the risks of modern slavery practices occurring in our operations and supply chains. We understand that this involves ongoing management efforts to identify, prevent and mitigate such risks through due diligence and remediation processes.

### 41. Policies, Processes and Procedures

CPS has the following policies, processes and procedures in place for assessing and addressing modern slavery risks:

Employee Manual	Our Employee Manual includes work, health and safety and environmental management policies.
Workplace Anti-Bullying & Anti-Harassment Policy	Our Workplace Anti-Bullying and Anti-Harassment Policy applies to all employees, directors, consultants, contractors and volunteers.  All CPS employees are required to read and acknowledge this policy. Employees are then notified of any new policies that are introduced and are required to acknowledge these policies as they are rolled out.
Employee Code of Conduct	Our Employee Code of Conduct applies to all employees, directors, agents and consultants of CPS.  In having this Code, we ensure that our people comply with our policies and procedures, in addition to relevant laws and regulations.
Recruitment and onboarding	CPS employees are required to read and acknowledge various policies (including those listed in this Modern Slavery Statement) at the time of being onboarded through our HR platform. Employees are then notified of any new policies that are introduced and are required to acknowledge these policies as they are rolled out.
Health and safety	At CPS, we prioritise the health and safety of our personnel.  Our Workplace Health and Safety Policy reflects our



	<p>commitment to ensuring a safe environment and operations for all employees and subcontractors of CPS. CPS has obtained certification in ISO 45001:2018 Occupational Health &amp; Safety.</p>
Our values	<p>Our values lay the foundation for what we care about the most. They provide a common purpose and show our customers what we are made of. CPS's values are:</p> <ul style="list-style-type: none"><li>○ Accountable to all stakeholders</li><li>○ Customer &amp; Stakeholder Focused</li><li>○ We operate with Integrity</li><li>○ We pursue Excellence in the work we do</li><li>○ We are Reliable &amp; Trustworthy</li><li>○ We are Collaborative</li><li>○ We apply Innovation to address challenges</li><li>○ Humility – we take our work seriously but ourselves not so much</li><li>○ Tolerance – we respect and appreciate the differences amongst us</li></ul>

## 4.2 Due diligence and Remediation

CPS also had the following policies, processes and procedures in place during the reporting period for reporting and addressing Modern Slavery risks:

<p>Whistleblower Policy</p>	<p>CPS strives to operate with a culture of ethical and appropriate corporate behaviour in all our business activities. This includes acting with integrity, honesty and in accordance with good corporate governance principles.</p> <p>Our Whistleblower Policy is designed to give guidance so that honesty and integrity are always maintained at CPS, this includes by providing individuals confidential means via which actual and suspected misconduct may be reported.</p>
<p>Supplier Code of Conduct</p>	<p>CPS's Supplier Code of Conduct explicitly requires our suppliers to ensure:</p> <ul style="list-style-type: none"> <li>○ employment is freely chosen, and no form of forced labour, (including debt bonded), or indentured labour, human trafficking, and slavery shall be used, and that there should be no unreasonable restriction on workers freedom of movement, including entering or exiting any company facilities;</li> <li>○ compensation paid to all workers complies with all applicable wage laws, including minimum wages, overtime hours and legally mandated benefits;</li> <li>○ the rights of workers to exercise a lawful right of free association are respected, including joining or not joining any association of their choice, including the right to bargain collectively;</li> <li>○ they exercise due diligence to identify modern slavery risks within their supply chain, and take all necessary action to mitigate these risks; and</li> <li>○ they comply with all Australian laws and respect the fundamentals of the International Labour Organisation regarding the minimum hiring age of workers and that no child labour will be used at any level in the supply chain.</li> </ul> <p>All suppliers are notified of their requirement to comply with the Supplier Code of Conduct at the time of onboarding, however this is currently a manual process so we acknowledge that there may be gaps. The Supplier Code of Conduct also directs our suppliers to raise concerns in accordance with the Whistleblower Policy where applicable.</p>

<p>Grievance Handling Policy</p>	<p>At CPS we aim to foster good relationships amongst employees and between employees and management. We acknowledge that problems can arise at work that may sometimes cause employees to feel aggrieved.</p> <p>Our Grievance Handling Policy outlines the procedures employees and management should follow to try to resolve a grievance and outlines the steps CPS will take to resolve a grievance.</p>
<p>Contractual arrangements</p>	<p>CPS includes a standard clause in our three key supplier contracts requiring our contractors to:</p> <ul style="list-style-type: none"> <li>○ ensure that they comply with all applicable laws, regulations and standards in relation to modern slavery;</li> <li>○ effect their own policies and procedures to ensure compliance with these laws and take reasonable steps to ensure there is no modern slavery in their operations or supply chains including through the implementation of due diligence procedures; and</li> <li>○ warrant that they have not been convicted of any modern slavery offences and have not been the subject of any investigation or enforcement proceedings in connection with modern slavery and requires contractors to give notice to CPS if it becomes aware of an actual or suspected breach of modern slavery laws.</li> </ul>
<p>Continuous monitoring</p>	<p>Through our ongoing monitoring of modern slavery risks, CPS will continue to publicly communicate our actions taken to address these risks by publishing a Modern Slavery Statement annually (as required by the Act).</p>
<p>Governance and training</p>	<p>At CPS, we recognise that promoting ethical and responsible behaviour starts at the top. We foster a culture of compliance, continuous improvement, integrity and honesty, which is reflected in the way we conduct our business.</p> <p>CPS is committed to training employees on our policies upon commencing employment to inform them of their rights and the standards and behaviour that is expected of them.</p>

## 5. Assessing the Effectiveness of our Actions

CPS recognises the importance of continuous improvement through regularly assessing the effectiveness of our actions taken to address modern slavery risks. In doing this, we aim to build more transparent and open relationships with our suppliers to mitigate the risk of modern slavery in our operations and supply chain.

We assess our performance in relation to modern slavery in the following ways:

- regularly engaging with our stakeholders to understand the impact of our operations;
- preparing an annual Modern Slavery Statement and tracking the steps we have taken to address modern slavery risks in our supply chains and the effectiveness of our actions; and
- consulting with external legal advisors on our modern slavery processes, policies and procedures to address gaps and to ensure best practice.

To date, no instances of modern slavery have been identified in our supply chain. However, we understand there is more work to do. As such, we are committed to engaging regularly with our stakeholders and suppliers to ensure modern slavery risks are identified and addressed.

## 6. Consultation

In preparing this statement, CPS consulted with key personnel including the senior leadership team and provided them with an opportunity to review the statement. In doing this, we ensure our key personnel are aware of our commitment to identifying, assessing and addressing modern slavery risks in our supply chain and are conscious of the actions they need to take in accordance with this statement.

## 7. Other Relevant Information

### Future actions

We are committed to further developing and continuously improving our processes as we progress our understanding about the modern slavery risks in our operations and supply chains and ways to mitigate them.

In the next reporting period, we intend to:

- Development and implement a Modern Slavery Policy;
- Introduce a streamlined, IT led supplier onboarding process, to allow us to identify modern slavery risks at the point of supplier inception;
- Complete a supplier assessment and categorise supplier spend, leading to enhanced data for analytics and improved management processes;
- Further review our operations, policies and procedures to ensure they are relevant and responsive to modern slavery risks; and
- Enhancing employee training, awareness, and education across all levels of the organisation in relation to modern slavery. This includes but is not limited to:

- undertaking a high-level briefing of modern slavery risks and issues at employees all-hands meeting;
- ensuring employees complete standardised online modern slavery training through our HR platform; and
- rolling out bespoke training to our executive team and key internal stakeholders.

## 8. Statement Approval

This Modern Slavery Statement was approved by the Board of CPS Technology & Infrastructure Pty Ltd in their capacity as principal governing body on 27<sup>th</sup> November 2024 and is signed by Scott Munro in his capacity as Executive Chairman of CPS Technology & Infrastructure Pty Ltd.



Scott Munro

Executive Chairman

CPS Technology & Infrastructure Pty Ltd

27 November 2024