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# Sky5G Australia Modern Slavery Statement

*Updated: 4 November 2026*

**AI-produced draft (version 1) — requires review by management and counsel before publication; the supply-chain facts, numbers and names in [square brackets] must be confirmed. Once approved, the sign-off block in section 9 must be completed.**

Modern slavery — forced labour, debt bondage, servitude, human trafficking, forced marriage, the worst forms of child labour and deceptive recruiting — exists in the supply chains of almost every business that buys electronics, builds infrastructure or contracts out labour. Telecommunications is no exception. This statement explains how we look for it in our business and our supply chains, and what we do about it.

## 1. About this statement

**Wi-Sky Queensland Pty Ltd (ABN 91 613 554 546), trading as Sky5G Australia** publishes this statement voluntarily. We are below the A$100 million consolidated-revenue threshold at which the *Modern Slavery Act 2018* (Cth) makes a statement mandatory, but we have chosen to report against the Act's **seven mandatory criteria** (sections 16(1)(a)–(g)) because the risks are real in our industry and our customers, staff and suppliers deserve to know what we do about them. This statement covers the financial year **1 July 2025 to 30 June 2026** [confirm period].

## 2. Our structure, operations and supply chains

**Structure.** Wi-Sky Queensland Pty Ltd (ABN 91 613 554 546), trading as Sky5G Australia is a privately owned company [confirm: directors, registered office] providing fixed wireless, 5G cellular and related internet services in Australia under the Sky5G brand, with [N] employees and [N] regular contractors at the date of this statement.

**Operations.** We design, build and operate a wireless network (towers, radio equipment, a mobile core, backhaul and data centres), supply modems, routers and SIMs to customers, sell services online, through our apps, by phone, through resellers and agents and in person, bill and support customers, and employ field technicians, sales, support, network-operations and administrative staff.

**Supply chains.** Our main categories of spend, and where they typically come from, are:

| Category | What we buy | Typical origin |
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| Network equipment | 5G radios, antennas, core and RAN software, switches, routers, power systems, batteries | Manufactured in China, Taiwan, Vietnam, Korea and Europe; bought through Australian and regional distributors |
| Customer equipment (CPE) | Modems, routers, outdoor units, SIM cards and eSIM profiles | Manufactured in China and South-East Asia; SIMs from international card manufacturers |
| Towers and construction | Steel towers and monopoles, civil works, electrical, fencing, solar and generators | Fabricated steel from Asia and Australia; local construction and electrical contractors |
| Field services | Installation, maintenance, tower climbing, site security | Local contractors and labour-hire firms |
| Software and cloud | Billing, network management, cloud hosting, SaaS tools | Australia, the United States, Europe and India |
| Customer service and sales | Call handling, chat support, reseller and agent networks | Our own staff; [BPO partner, if any]; resellers in Australia |
| Facilities and corporate | Cleaning, security, office supplies, uniforms, vehicles, travel | Local suppliers |

Our tier-one suppliers are mostly companies in Australia and Australia; the higher-risk work (manufacturing, raw materials) sits two or more tiers down, where our visibility is lowest.

## 3. Risks of modern slavery practices in our operations and supply chains

We assessed risk using the Global Slavery Index, the US Department of Labor's List of Goods Produced by Child or Forced Labor, sector guidance for ICT (the Responsible Business Alliance and the Joint Audit Cooperation for telecoms), and our own knowledge of our suppliers. We rate the following as our highest inherent risks:

- **electronics manufacturing** — radios, modems, routers, SIMs and batteries are assembled in facilities where forced overtime, recruitment fees, passport retention and state-imposed labour transfer programs have been documented; this is the largest share of our spend and the hardest to see into;
- **raw materials** — cobalt, tin, tantalum, tungsten and gold in batteries and electronics, and steel for towers, have documented child and forced labour at the mining and smelting stage;
- **construction, tower and field work** — labour-hire, migrant and subcontracted workers in civil, electrical and tower-climbing crews, with risks of underpayment, debt to recruiters, unsafe accommodation and document retention;
- **cleaning, security and facilities services** — low-margin, subcontracted sectors with recognised exploitation risk;
- **offshore customer service, software development and cloud** — generally lower risk, but with recruitment-fee and excessive-hours risks in some locations;
- **our Pacific operations and partners** — recruitment and labour-hire practices, seasonal and migrant workers, informal subcontracting and limited labour inspection in some Pacific markets raise the inherent risk for tower crews, security and cleaning contractors engaged by the group's Pacific entities.

Within our own workforce the risk is low: staff are employed directly on written contracts, paid at or above award or statutory rates through payroll, free to leave, and no recruitment fees are charged. We have identified no instances of modern slavery in our operations or supply chains in the reporting period; that reflects the limits of our visibility as much as the absence of harm.

## 4. Actions we have taken to assess and address those risks

- **Supplier Code of Conduct** — our suppliers must acknowledge our code, which prohibits forced, bonded, indentured and child labour, recruitment fees, document retention, excessive hours and retaliation against workers who raise concerns, and requires suppliers to flow the same terms down to their own suppliers. [Confirm adoption date; attach as Schedule 1.]
- **Due-diligence questionnaire** — new and renewing suppliers in the higher-risk categories (equipment, CPE, construction, field services, facilities, labour hire) complete a modern slavery questionnaire covering their workforce, recruitment, subcontracting and audits; answers are scored and higher-risk suppliers are asked for evidence (audit reports, policies, certifications such as RBA membership).
- **Contract clauses** — our supply and services contracts include modern slavery warranties, the right to audit, a duty to notify us of incidents, a remediation-first approach and termination rights for serious, unremediated breaches.
- **Preference for responsible manufacturers** — for network and customer equipment we prefer vendors that publish their own modern slavery statements, hold RBA or equivalent membership and disclose conflict-minerals reporting; we record this in supplier selection.
- **Labour-hire and contractor checks** — field, construction, cleaning and security contractors must hold the licences the law requires (including a Queensland labour-hire licence where applicable), pay at least the statutory minimum, and allow us to speak to workers on site.
- **Grievance and whistleblower channel** — workers of ours or of a supplier, and anyone else, can report concerns confidentially to [whistleblower email / hotline] or through our Complaints Handling Process; reports are investigated under our whistleblower policy with protection from retaliation. We also publish how to reach the Attorney-General's Department's Modern Slavery Business Engagement Unit, the Fair Work Ombudsman, or the Australian Federal Police (131 AFP) for suspected trafficking or forced labour.
- **Staff training** — our staff training program includes modern slavery awareness for procurement, field-operations and management staff, with annual refreshers tracked on each person's training record, and the platform records who has completed it. [Confirm module name.]
- **Remediation** — if we find modern slavery we will prioritise the safety and remedy of the people affected (working with the supplier, specialist NGOs and authorities) over ending the relationship, and will end a relationship only where a supplier refuses to remediate.
- **Governance** — a director [name] is responsible for this statement; procurement and operations managers report on supplier due diligence to the board [twice] a year; this statement and the supplier code are reviewed annually.

## 5. How we assess the effectiveness of these actions

We track: the percentage of higher-risk suppliers that have acknowledged the code and completed the questionnaire; the number of suppliers rated higher-risk and the follow-up completed; the number of modern slavery grievances received and how they were resolved; the share of relevant staff who completed training; audits or site visits carried out; and the proportion of equipment spend with vendors that publish their own statements. We report these to the board annually and set targets for the next period [insert this year's figures and next year's targets]. We review this framework after any incident and when the law or guidance changes.

## 6. Consultation with entities we own or control

Wi-Sky Queensland Pty Ltd has no subsidiaries. It operates alongside the other Sky5G group companies in Papua New Guinea, Vanuatu, Fiji and Solomon Islands, which share the platform, the supplier code and this reporting framework; this statement was prepared in consultation with their managers, who reviewed the

supply-chain mapping and the actions in section 5. [Confirm group structure and whether any entity is owned or controlled.]

## 7. Other relevant information

Our Privacy Policy, Supplier Code of Conduct, Whistleblower Policy, Complaints Handling Process and staff Code of Conduct support this statement. We welcome questions and information about our supply chains at sales@sky5g.com.au or 1300 413 798.

## 8. Looking ahead

In the coming period we plan to: complete the questionnaire for 100% of higher-risk suppliers; map our top-20 equipment suppliers to tier two; add modern slavery to our reseller and agent agreements; run worker-voice checks on construction sites; and publish our next statement within six months of the financial-year end.

## 9. Approval

This statement was approved by the board of directors of Wi-Sky Queensland Pty Ltd (ABN 91 613 554 546) on [date] and is signed by a responsible member of the board.

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| Signed | |
| Name | [director name] |
| Position | Director |
| Date | [date] |