



AFL Telecommunications Australia Pty Ltd
ABN 98 104 136 629
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WEB: www.AFLglobal.com

Introduction

This Modern Slavery Statement is made by **AFL Telecommunications Australia Pty Ltd (ABN 98 104 136 629)** in accordance with the requirements of the **Modern Slavery Act 2018 (Cth)** for the reporting period **1 April 2025 to 31 March 2026**.

AFL Telecommunications Australia Pty Ltd ("AFL Australia") is committed to conducting business ethically and responsibly and to respecting internationally recognised human rights throughout its operations and supply chains. AFL Australia maintains a zero-tolerance approach to all forms of modern slavery, including forced labour, bonded labour, child labour, servitude, deceptive recruitment practices and human trafficking.

This Statement outlines AFL Australia's structure, operations and supply chains, the modern slavery risks identified within those operations and supply chains, the actions taken to assess and address those risks, and AFL Australia's ongoing commitment to continuous improvement.

AFL Australia's approach is supported by AFL's Global Modern Slavery Policy and AFL's Global Slavery and Human Trafficking Statement, which establish expectations for ethical conduct, supplier engagement, transparency and responsible sourcing throughout AFL's global operations and supply chains.

Structure, Operations and Supply Chain

Organisational Structure

AFL Telecommunications Australia Pty Ltd is part of the AFL Group, a global manufacturer, distributor and supplier of fibre optic products, telecommunications infrastructure solutions and related technologies.

AFL's parent organisation, America Fujikura Ltd. (AFL), operates internationally across North America, Australia, New Zealand, Europe and Asia and is wholly owned by Fujikura Ltd., Japan.

AFL Telecommunications New Zealand Limited operates as a separate legal entity within the AFL Group. The New Zealand business is managed through AFL Australia's ANZ operating model, including shared leadership, procurement, supply chain and finance functions. Where relevant, consultation with AFL New Zealand Limited was undertaken during the preparation of this Statement.

Operations are conducted across:

- Victoria
- Queensland
- Western Australia
- Australian Capital Territory
- New Zealand

Operations

AFL Australia supports telecommunications, utility, infrastructure and enterprise customers throughout Australia and New Zealand through the provision of products and services including:

- Fibre optic cable assembly
- Distribution and warehousing
- Procurement and sourcing
- Importing and exporting fiber optic products
- Supply chain management and logistics activities

AFL Australia operates within an integrated ANZ operating model, with procurement, supplier management, sourcing activities and aspects of supply chain governance coordinated across Australia and New Zealand to support consistent operational practices, supplier oversight and compliance expectations.

Supply Chain

AFL Australia's supply chain includes suppliers, manufacturers and service providers located across Australia and internationally. AFL sources products and materials from a diverse supplier base, with approximately 25 suppliers located in Australia, 20 in China, and a smaller number of suppliers located in Vietnam, Thailand, Cambodia, the United States, the United Kingdom, Europe, the Middle East and Singapore. The supply chain supports AFL Australia's fibre optic and telecommunications operations through the procurement of fibre optic cable assemblies, fibre optic cables, connectors and adapters, fibre passive devices, heat shrink products, cable glands, protective tubes and braids, metal and plastic enclosures, as well as fibre optic cleaning and testing equipment.

As a global sourcing organisation operating within the telecommunications industry, AFL Australia procures products from a range of manufacturing and distribution networks that span multiple countries and jurisdictions. AFL Australia recognises that certain regions within its supply chain may present an elevated risk of modern slavery due to factors such as labour-intensive manufacturing processes, the use of migrant labour, complex supply chain structures and differing levels of labour law enforcement and regulatory



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oversight. Consequently, AFL Australia continues to incorporate modern slavery considerations into its supplier selection, assessment and monitoring processes to support responsible sourcing practices throughout its supply chain.

Identified Modern Slavery Risks

AFL Australia assesses modern slavery risk across both its direct operations and wider supply chain.

Risks Within AFL Australia's Operations

AFL Australia employs its workforce directly and does not utilise:

- Labour hire agencies
- Temporary labour providers
- Third-party warehouse labour
- Contract workforce arrangements for core business activities

As a result, AFL Australia considers the risk of modern slavery occurring within its direct workforce to be relatively low.

Risks Within Supply Chains

AFL Australia recognises that the greatest exposure to modern slavery risk exists within its domestic and international supply chains.

Manufacturing Risks

Manufacturing activities in China, Vietnam, Cambodia, Thailand and Mexico may present elevated inherent risks due to:

- Excessive working hours
- Recruitment fee practices
- Dependence on migrant workers
- Restricted worker movement
- Inadequate worker grievance mechanisms
- Potential exploitation of vulnerable labour groups

Raw Material and Component Risks

Some AFL products contain components sourced through complex, multi-tier global supply chains where visibility beyond first-tier suppliers can be limited.

Potential risks include:

- Forced labour within upstream raw material processing
- Child labour within lower-tier supply chains
- Unethical recruitment practices
- Limited supply chain transparency

Logistics and Transportation Risks

Risks may also arise through logistics providers, freight forwarders and transportation operators where subcontracting arrangements or vulnerable worker populations are present.

Geographic Risk Exposure

AFL Australia has identified the following sourcing regions as requiring heightened diligence and monitoring:

- China
- Vietnam
- Cambodia
- Thailand
- Mexico

These locations remain a primary focus of AFL Australia's supply chain due diligence activities.



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Actions Taken to Assess and Address Risks

Policy Framework

AFL Australia applies AFL's Global Modern Slavery Policy (Anti-Slavery and Human Trafficking), which establishes AFL's commitment to:

- Zero tolerance for modern slavery
- Ethical sourcing practices
- Human rights protection
- Supplier accountability
- Reporting and whistleblower protections
- Management oversight and governance responsibilities

The policy applies to employees, directors, contractors, suppliers and business partners and requires modern slavery concerns to be identified, prevented and reported.

Supplier Due Diligence

AFL Australia maintains supplier assessment processes designed to identify and manage modern slavery risks.

These include:

New Supplier Evaluation

Potential suppliers are assessed as part of the supplier onboarding and qualification process.

Modern Slavery Questionnaires

Suppliers are required to complete modern slavery self-assessment questionnaires covering:

- Labour and employment practices
- Human rights policies
- Recruitment practices
- Working conditions
- Supply chain governance

Online Modern Slavery Assessments

AFL Australia utilises online modern slavery questionnaires to support supplier risk assessments and identify areas requiring additional review.

Supplier Monitoring

Supplier monitoring activities undertaken during the reporting period included:

- Quarterly supplier performance reviews
- Annual supplier modern slavery self-assessments
- Supplier corrective action requests (SCARs)
- Ongoing supplier engagement and monitoring

Supplier Audits

Where required, AFL Australia collaborates with AFL's Global Sourcing Team based in Shenzhen, China to undertake supplier audits and site assessments.

These activities support verification of supplier compliance, operational practices and ethical sourcing expectations.

Supplier Code of Conduct

AFL introduced a global Supplier Code of Conduct outlining expectations relating to legal compliance, ethical business conduct, labour standards and human rights throughout AFL's supply chain. Suppliers are expected to uphold these standards and apply similar expectations throughout their own supply chains.

Reporting and Whistleblower Mechanisms

Employees and stakeholders are encouraged to raise concerns regarding suspected modern slavery through AFL's Ethics and Compliance reporting mechanisms.

AFL's Ethics & Compliance Portal provides access to confidential and anonymous reporting channels and supports AFL's commitment to transparency and open communication.



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Remediation

Where concerns are identified, AFL Australia may:

- Engage directly with suppliers
- Request corrective actions
- Conduct follow-up reviews
- Increase monitoring activities
- Undertake supplier audits
- Reassess supplier suitability
- Terminate supplier relationships where significant issues remain unresolved

Assessing Effectiveness

AFL Australia recognises the importance of assessing the effectiveness of its actions to identify, prevent and address modern slavery risks within its operations and supply chain.

During the reporting period, AFL Australia assessed the effectiveness of its modern slavery risk management activities through:

- Completion and review of supplier modern slavery questionnaires.
- Quarterly supplier performance reviews.
- Annual modern slavery self-assessments completed by suppliers.
- Supplier corrective action requests (SCARs) where supplier performance concerns were identified.
- Supplier audits conducted with support from AFL's Global Sourcing Team.
- Review of reports submitted through AFL's Ethics and Compliance reporting channels.
- Periodic review of supplier engagement and due diligence activities.

No modern slavery allegations, complaints or identified incidents were reported through AFL's Ethics and Compliance channels during the reporting period.

AFL Australia acknowledges that its effectiveness measurement framework remains in development. During future reporting periods, AFL intends to enhance the monitoring and measurement of modern slavery risk management activities through the establishment of additional performance indicators, improved supplier risk profiling and increased reporting on supplier due diligence outcomes.

Training and Awareness

AFL Australia supports employee awareness of ethical business practices, responsible sourcing and human rights protection through AFL's global compliance framework.

Training programs made available to employees have included:

- Modern Slavery Policy (Anti-Slavery and Human Trafficking)
- Human Trafficking Prevention
- Red Flags of Human Trafficking
- Human Trafficking: Know the Code
- Code of Conduct Training
- Gifts and Bribery Training
- Delegation of Authority Training
- Governance and Compliance Training

These programs are designed to increase awareness of Human rights risks, Modern slavery indicators, Ethical business conduct, Reporting obligations and Supply chain responsibilities.

AFL Australia recognises the importance of ongoing education and intends to expand targeted modern slavery and responsible sourcing training for procurement, sourcing and supply chain personnel in future reporting periods.

The provision of training aligns with AFL's global commitment to employee awareness and supply chain risk management.

Consultation with Controlled Entities

AFL Australia consulted with relevant AFL business units and key stakeholders during the preparation of this Statement.

Consultation included engagement with:

- AFL Australia & New Zealand leadership
- ANZ Procurement and Supply Chain functions
- AFL Global Sourcing Team



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- Relevant AFL Group stakeholders involved in supplier management and sourcing activities

This consultation supports a coordinated approach to identifying and addressing modern slavery risks across AFL's regional operations and supply chains.

Future Commitments

AFL Australia is committed to continuously improving its approach to identifying and managing modern slavery risks within its operations and supply chains. During FY2026–27, AFL Australia intends to continue the use of supplier modern slavery questionnaires, maintain consideration of modern slavery risks during supplier onboarding and review activities, engage with suppliers on responsible labour practices, and utilise existing supplier monitoring and corrective action processes where required. AFL Australia will also continue to promote employee awareness of its Modern Slavery Policy and monitor opportunities to strengthen its due diligence, reporting and training activities over time. AFL Australia remains committed to maintaining alignment with AFL's global compliance framework and ethical sourcing expectations.

Approval by Principal Governing Body

This Modern Slavery Statement was approved by the **Board of Directors of AFL Telecommunications Australia Pty Ltd** in accordance with section 13 of the Modern Slavery Act 2018 (Cth).

The Board has reviewed the contents of this Statement and supports AFL Australia's ongoing commitment to identifying, assessing and addressing modern slavery risks throughout its operations and supply chains.

Approved on: 28th August 2026

Signed for and on behalf of AFL Telecommunications Australia Pty Ltd

A handwritten signature in blue ink, appearing to read 'Tony Dunstan', written over a light blue horizontal line.

Tony Dunstan
President – ANZ & India
AFL Telecommunications Australia Pty Ltd
Date: 28-Aug-2026