

# **MORE GROUP HUMAN RIGHTS POLICY**

Last Updated: January 2024

## 1. Human Rights Policy Statement

At the More Group, we recognise our role and responsibilities in protecting and upholding human rights. We understand that we have the ability to directly and indirectly impact on the human rights of others through our internal business operations and our relationships with third-party suppliers and partners.

This Policy reflects the More Group's ongoing commitment to respecting human rights, including by identifying and addressing human rights risks in our operations and supply chains.

## 2. Scope

This Policy applies to all entities in the More Group of companies (the "*More Group*"), which includes:

- More Telecom Pty Ltd ("*More*")
- Tangerine Telecom Pty Ltd ("*Tangerine*")
- More Services Pty Ltd
- More Telecom Australia Pty Ltd
- More Connect Pty Ltd
- PayNuts Pty Ltd
- More Bookkeeping Services Pty Ltd

As of FY23/24, More and Tangerine are reporting entities for the purposes of the Modern Slavery Act 2018 (Cth) ("*Modern Slavery Act*"). More and Tangerine will submit a joint Modern Slavery Statement in compliance with the Modern Slavery Act from FY24 onwards.

This Policy also applies to all employees and contractors of the *More Group*, and to any other person or entity which is notified that they are required to comply with this Policy. This Policy also forms part of our Supplier Code of Conduct, and therefore applies to our contracted third-party suppliers and partners.

#### 3. Our Human Rights Commitments

At the *More Group*, we are committed to respecting and supporting human rights in our own business operations, and through our supplier and partner relationships, in accordance with the International Bill of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights and the ten principles of the UN Global Compact.

We honour these commitments by:

- Complying with applicable laws and regulations that support and protect human rights in the places where we operate.
- Ensuring fair, safe and healthy working conditions for our employees and contractors that are free from discrimination, bullying, harassment, victimisation and abuse.
- Not accepting child labour, forced, bonded or compulsory labour or other modern slavery practices in any form in our business operations of supply chains, in line with activities and commitments set out in annual Modern Slavery Statements.
- Having zero tolerance for bribery, corruption or other forms of unethical or illegal behaviour of any kind.



- Respecting the rights of employees to freedom of association and collective bargaining in accordance with relevant laws.
- Upholding a culture of diversity, inclusiveness, and respect within our workforce and amongst our customers and suppliers that is free from bullying, victimisation and harassment.
- Respecting rights to privacy by protecting the privacy of personal information that we hold, in line with the Privacy Policies of *More Group* companies.
- Engaging in an ongoing process of assessing the human rights risks and impacts of our business operations and supplier relationships and addressing any issues that arise through these reviews.
- Providing a grievance reporting mechanism for human rights concerns. If we identify that we have caused or contributed to human rights harm, we commit to providing for or participating in appropriate remediation for those who are impacted.
- Communicating this Policy to our workforce and suppliers and ensuring they receive appropriate training on these commitments.

# 4. How We Implement Our Human Rights Commitments

The *More Group* undertakes ongoing due diligence and monitoring with respect to modern slavery risks in our supply chain. Where we identify risks or issues, we take appropriate action to ensure we are upholding our commitments and continuously improving our approach to human rights.

We also expect our service providers, suppliers and contractors to share our commitments to act lawfully and ethically, and to cooperate with us in implementing our human rights commitments. We set out and enforce these expectations in relevant compliance clauses in our supplier contracts.

We expect our employees, contractors and suppliers to consider any human rights implications when taking actions or making decisions on behalf of the *More Group*. We provide appropriate training on our Policy to our workforce and relevant supplier personnel and encourage them to report human rights concerns as they arise.

This Policy is approved by the directors of the *More Group* companies and reviewed annually as part of the preparation of the Modern Slavery Statement submitted by More and Tangerine (or more frequently as a result of any changes to relevant laws or regulations).

Compliance with this Policy is mandatory for *More Group* employees and contractors, and individuals may face disciplinary action if they fail to comply with it (including termination of their employment or contract for services). If any employee or contractor breaches any applicable law, they may also be personally liable for any applicable penalties.

# 5. Reporting Human Rights Concerns

*More Group* employees and contracts can raise human rights concerns or complaints with their manager or an appropriate person on the *More Group* leadership team.

Alternatively, you can confidentially raise concerns via the More Group Whistleblower Policy by completing and submitting a whistleblower report at <a href="https://more.com.au/whistleblower-reporting">https://more.com.au/whistleblower-reporting</a>. Our Policy sets out the process that is followed for investigating and responding to a whistleblower report, as well as the protections available to whistleblowers (including the ability to make a report anonymously).

We are committed to properly investigating and responding to all concerns raised in a timely manner, and to providing or contributing to appropriate remediation activities where we reasonably determine that we have caused or contributed to any human rights harm.