

# CHORUS LIMITED MODERN SLAVERY STATEMENT

2025

# Chorus Modern Slavery Statement FY2025

This is Chorus Limited's and Chorus New Zealand Limited's (together, **Chorus**) joint statement under the Modern Slavery Act 2018 (Cth), covering the reporting period for the financial year ended 30 June 2025.

Chorus is committed to conducting our business in accordance with high standards of social, labour, and ethical conduct. We expect that all workers engaged on our behalf receive their full legal entitlements and are treated with dignity and respect. We welcome this opportunity to confirm our commitment to the elimination of modern slavery.

## Chorus' structure, operations, and supply chains

### Our structure

REPORTING ENTITIES	DESCRIPTION
Chorus Limited ARBN 152 485 848	The Chorus parent company, listed on the Australian and New Zealand security exchanges
Chorus New Zealand Limited NZCN 3454256	The Chorus operating entity (wholly owned by Chorus Limited)

Chorus Limited is listed under the ticker CNU on the NZX Main Board in New Zealand and the ASX in Australia. It is the borrowing entity under the group's main financing arrangements and the entity which has partnered with the Crown for the Ultra-Fast Broadband (**UFB**) build.

Chorus New Zealand Limited (wholly owned by Chorus Limited) is the group's operating company. Chorus Limited and Chorus New Zealand Limited share the same Board members and Chair.

Chorus' registered office is at Level 10, 1 Willis Street, Wellington, 6011, New Zealand.

### Chorus operations FY25

HIGHLIGHTS	
Connections	1.115M
Hyperfibre services	2, 4, 8 Gbps
Petabytes of data carried on our network	8,741
Corporate offices	Christchurch, Wellington, Hamilton, Auckland
Permanent and fixed term employees	755
Independent and agency contractors in core operations	34
Technicians working on Chorus' behalf	1,200

Chorus is New Zealand’s largest fixed line telecommunications network operator providing wholesale telecommunications services.

Our operations include building, maintaining, and operating an open access telecommunications and internet network predominantly made up of local telephone exchanges, cabinets, and copper and fibre cables. As at the end of FY25, we had approximately 755 permanent and fixed term employees and an additional 34 independent and agency contractors engaged in our core operations. These Chorus people are all based in New Zealand.

### Supply chains

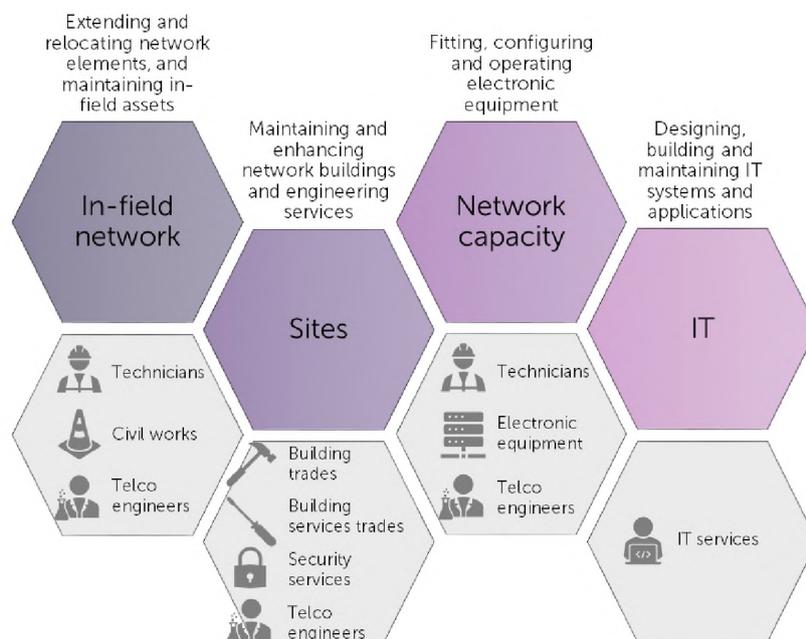
Chorus’ supply chains span around 1,100 direct suppliers with approximately \$730m procurement spend in FY25.

We procure a wide range of goods and services across several categories related to our business as a regulated telecommunications network provider including network equipment and material, IT hardware and software, professional services, marketing, and property and engineering services.

To secure our network field workforce, we partner with a small number of sophisticated Field Service Providers who engage their personnel through a mixture of direct employment and subcontracting. Figure 1 shows activities and resources for our main operations. Together, these comprise the bulk of our supplier spend. Most of our direct supplier spend is in Aotearoa.

We source a range of goods and services internationally, primarily from suppliers in Europe, North America and Asia with a New Zealand presence, this includes the electronic equipment procured for deployment in our networks. Beyond our Field Service Provider partners, we have surveyed key suppliers to better understand their risks and responses to modern slavery.

FIGURE 1: KEY DELIVERY AREAS AND RESOURCE TYPES FOR EACH AREA



## Governance framework

Chorus' Board and management are committed to ensuring our people act ethically, with integrity and in accordance with our policies and values. Our corporate governance practices are outlined, and our key corporate governance documents, are available at [www.chorus.co.nz/governance](http://www.chorus.co.nz/governance).

Relevant policies available on that site include:

- Chorus People Code of Ethics
- Director Code of Ethics
- Health and Safety Policy
- Legal and Compliance Policy
- Managing Risk Policy
- Sustainability Policy
- Whistle Blowing Policy

These policies are each approved at least every two years. They are each approved by the CEO or the Board.

## Unleashing potential through connectivity - Enabling better futures for Aotearoa

We take a long-term view of our network infrastructure investments, and our people take pride in delivering an asset for New Zealand's ongoing social and economic betterment.

The broadband networks we build and maintain are closely aligned with the infrastructure-focused elements of the United Nations Sustainable Development (UNSD) Goals.

Our work to address the risks of modern slavery aligns with UNSD Goal 8; Decent Work and Economic Growth, and UNSD Target 8.7; End Modern Slavery, Trafficking and Child Labour.

More information on our approach to sustainability is available in our Annual Report, available here: <https://company.chorus.co.nz/reports>; and in our Sustainability Report, available here: <https://company.chorus.co.nz/sustainability>.

## The risks of modern slavery practices in our operations and supply chains

CHORUS CORE OPERATIONS	CHORUS SUPPLY CHAIN
<ul style="list-style-type: none"> <li>• Employees (permanent and fixed term)</li> <li>• Independent and agency contractors</li> </ul>	<ul style="list-style-type: none"> <li>• 1,100 direct suppliers, spend \$730m</li> <li>• Complex, multiple sub-tiers</li> </ul>
MODERN SLAVERY RISK LOW, GIVEN:	MODERN SLAVERY RISK VARIES FROM LOW TO HIGH, BASED ON:
<ul style="list-style-type: none"> <li>• Mainly office based roles in New Zealand</li> <li>• Skilled workforce</li> <li>• Mature legal and regulatory settings</li> </ul>	<ul style="list-style-type: none"> <li>• Labour skill/ intensity</li> <li>• Sector and industry</li> <li>• Geographic</li> <li>• Entity</li> </ul>

Chorus has analysed where it may cause, contribute to, or be directly linked to, modern slavery risks based on a review taking known risk factors into account, including risks related to sector and industry; products and services; geographic and individual entities in our supply chain. Our findings include:

**Cause** - There is negligible or no modern slavery risk related to our employees and independent contractors engaged in our core operations. These independent contractors are highly skilled and well remunerated.

**Contribute** - We recognise that cost-reduction or other activities may inadvertently facilitate or incentivise modern slavery in our supply chains. We work to mitigate this risk in our contracted field

work force by conducting analysis to satisfy ourselves that we are paying enough for services to allow efficient contractors to pay their workers properly. In addition, we have implemented an extensive Worker Welfare programme described below.

**Directly linked** - There are risks that we are directly connected to modern slavery through the activities of entities in extended contractual supply chains. For example, in electronics manufacturing and the source materials for that manufacturing.

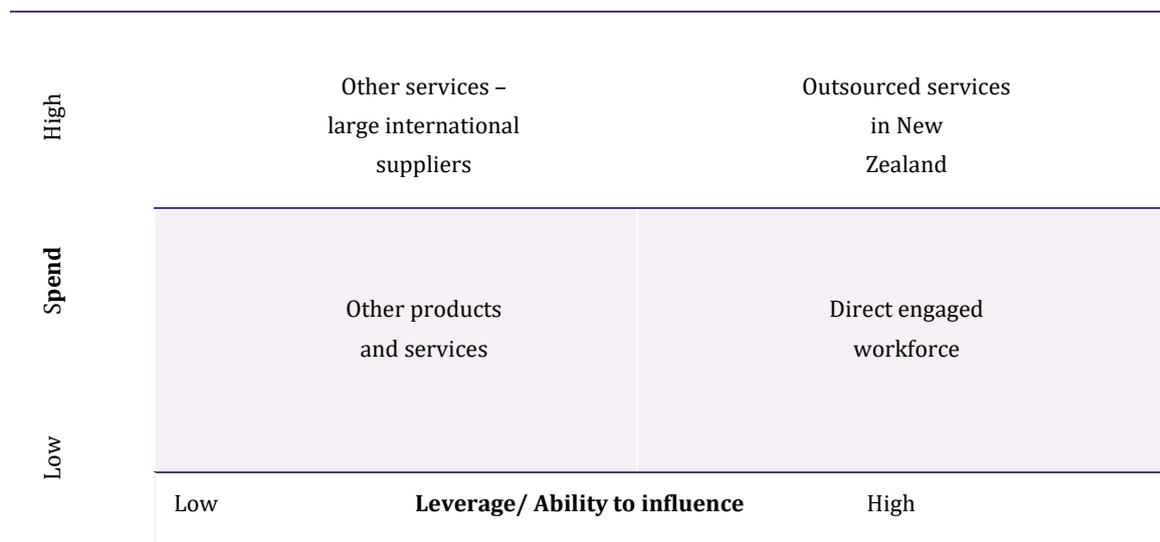
Figure 2 shows at a high level, the key spend areas in relation to the leverage or influence Chorus assesses it has over modern slavery outcomes.

As noted above, our employees and independent direct contractors are considered at low risk of experiencing any form of modern slavery. Chorus has an established and well-resourced People and Culture team overseeing internal employment practices.

Our Worker Welfare programme is focussed on the highest spend outsourced domestic Field Service Providers.

Multinational providers and other smaller providers are managed through the procurement process with ongoing review for higher value contracts.

FIGURE 2: SUPPLY CHAIN 'SPEND / LEVERAGE' RELATIONSHIP



How we assess and address these risks, including due diligence and remediation processes

### Chorus Supplier Code of Practice

The Chorus Supplier Code of Practice establishes standards to ensure that working conditions within Chorus' supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. Our commercial team administers our Supplier Code of Practice, which is incorporated into our supplier contracts, and has governance oversight from the Board.

CODE AREAS	CONTENT SUMMARY
Human rights	Informed by

	<ul style="list-style-type: none"> <li>• UN Global Compact</li> <li>• UN Universal Declaration of Human Rights</li> <li>• UN Convention on the Rights of the Child</li> <li>• New Zealand Human Rights Act</li> </ul>
Health and safety	<ul style="list-style-type: none"> <li>• Health and safety of workers and others in the vicinity of Chorus workplaces must be protected</li> <li>• Chorus' suppliers must have health and safety management policies, practices, and management systems</li> </ul>
Labour rights	Protections covering <ul style="list-style-type: none"> <li>• Wages and benefits</li> <li>• Anti-discrimination</li> <li>• Bullying and harassment</li> <li>• Forced, compulsory and child labour</li> <li>• Non-retaliation for raising grievances</li> <li>• Freedom of association</li> </ul>
Environmental sustainability	Protections for <ul style="list-style-type: none"> <li>• Compliance with applicable laws and regulations</li> <li>• Conflict minerals</li> <li>• Resource use and waste generation</li> </ul>
Business integrity	Suppliers required to <ul style="list-style-type: none"> <li>• Operate with highest standards of integrity, transparency, and honesty</li> <li>• Comply with all applicable laws, including in relation to bribery and corruption, fair competition, and trade controls</li> <li>• Respect third party intellectual property</li> <li>• Avoid actual, and properly manage potential conflicts of interest</li> </ul>
Management systems	<ul style="list-style-type: none"> <li>• Suppliers must have robust systems and controls covering the implementation and management of their obligations under the Code</li> <li>• Chorus reserves the right to audit and monitor supplier conformance, and, if not satisfied, can immediately and without penalty suspend the Supplier's supply of any goods or services to Chorus that are impacted in any way by the relevant non-compliance</li> </ul>

We manage modern slavery risks during the procurement lifecycle: including tendering, supplier selection; prequalification; contracts with strong terms and conditions; and an ongoing Worker Welfare programme and audit regime focused on our field workforce to assess supplier performance.

We expect our suppliers to share our commitment that everyone is treated fairly. We work closely with our Field Service Provider partners, to maintain our network, meet the demand for fibre connections and deliver a good customer experience. This workforce numbers about 1,150 people and is reducing as the fibre network rollout concludes and we retire overlapping areas of our copper network.

Our Worker Welfare team monitors our contractor and subcontractor field workforce within Aotearoa. The aim is to make Worker Welfare an everyday and non-negotiable part of our business, like health and safety.

From our Ethical Voice survey to technicians and sub-contractors that we introduced in FY23, through our online portal and independent whistle-blower process, our Worker Welfare team monitors our contractor and subcontractor field workforce.

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ETHICAL VOICE SURVEY

- Introduced in FY23 in consultation with our Field Service Provider partners
- Questions cover working conditions and entitlements, health and safety, ability to raise concerns
- Survey made available in English, Hindi, Punjabi, and Tagalog
- Extends beyond Tier 1 to workers in our supply chain who are employees of subcontractors
- 1 survey conducted in FY25
- Overall satisfaction score of 69.5% an increase from 68% in the previous year

Our cross-business governance team oversees any investigation of actual or potential work mistreatment and oversees the Field Service Providers' worker welfare programmes. If we identify worker welfare issues, we'll notify relevant regulatory authorities and, where appropriate, ban companies from working on our network. See: <https://worker-welfare.chorus.co.nz>

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[HTTPS://WORKER-WELFARE.CHORUS.CO.NZ](https://worker-welfare.chorus.co.nz)

- Information on minimum employment rights
- An explanation of different visas that workers can apply for to work in New Zealand
- Guide to working and living in New Zealand
- Our Supplier Code of Practice that establishes standards to protect workers
- Channels for lodging complaints (via Chorus, Field Service Providers, and government agencies)

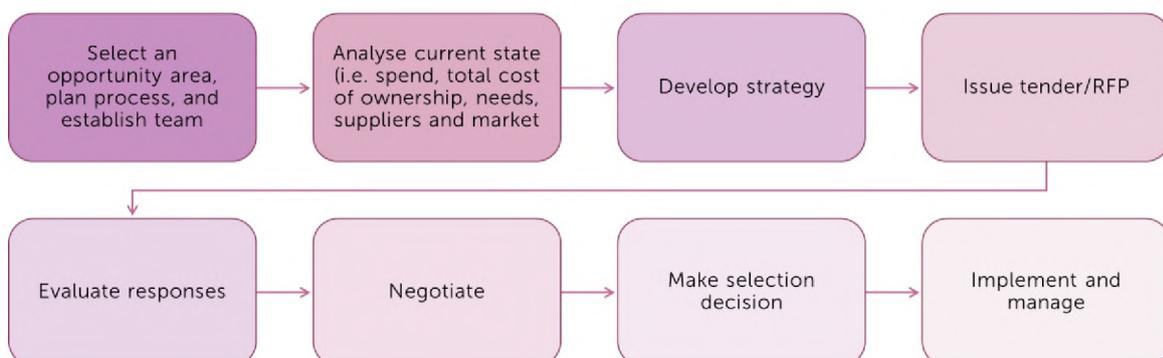
Our Procurement Policy ensures we apply consistent, professional procurement practices and that we secure necessary materials and services at appropriate quality levels on commercially favourable terms.

Our policy requires us to use best practice procurement strategies and tools. These strategies and tools help ensure the lowest whole-of-life cost through sustainable relationships that enable and incentivise suppliers to deliver the best possible outcome through:

- clear processes for establishing, renewing, and varying supply arrangements
- commercial terms that incentivise efficiency, quality, and performance
- contract governance and performance management

Our procurement processes utilise competitive processes to identify, evaluate and award outsourced work.

FIGURE 3: CHORUS PROCUREMENT PROCESS



All tenders issued by Chorus include appropriate modern slavery provisions for the nature and scale of the tender. These provisions are reflected in the final contract and managed through the contract implementation.

## Field workforce

Chorus implemented an extensive Worker Welfare programme following the identification of issues involving the mistreatment of migrant workers in our subcontracted field workforce during FY19. These issues included poor labour standard practice (e.g., poor record keeping, non-payment of holiday pay) through to a small number of more serious allegations of exploitation. Notably, the proportion of our field workforce on migrant visas is steadily reducing, from approximately 43% in FY20 to approximately 20% in FY25.

We adapt our worker support and monitoring activity based on changes to our workforce requirements over time. In FY25, Chorus continued to focus on managing the reducing workforce requirements as fibre installation and maintenance needs reduce.

To support this in FY25, we:

- conducted one Ethical Voice survey reaching out to technicians and sub-contractors for feedback on health and safety and employment conditions. This fed into action plans to improve conditions and communications. This is established as an ongoing tool for continuous improvement in our Field Service Provider supply chain; and
- continued to work with our Field Service Providers to ensure proper cash flows through the supply chain and to review downsizing plans and processes in line with our forecasted requirements.

## Grievance mechanism metrics

When complaints are made, whether directly or via our independent whistle-blower process, they are investigated thoroughly with the aim to remediate any problems as quickly as possible.

We provide foreign language support and translators to assist complainants where necessary.

During FY25 we received 21 complaints of mistreatment of workers. Complaints were received directly through our staff, via our whistle-blower line, and to our Field Service Providers.

All the complaints were investigated. As a result, eleven companies working for Chorus were terminated. One company was subject to ongoing oversight, and five companies were subject to remedial actions for minor matters. These companies are being monitored closely to ensure that no repeat of the breaches of our Supplier Code of Practice occur. In three cases no breach was found. One case remained under investigation at the end of FY25.

INVESTIGATIONS	FY23	FY24	FY25
Complaints (via whistle-blower and other channels) – all investigated	15	13	21
Complaint verified; subcontractors blacklisted from Chorus work	1	4	11
Complaint verified; subcontractors subject to oversight to remediate and improve performance	7 relating to 2 companies	3	1
Minor matters that were remediated	5 relating to 4 companies	1	7
Investigation found no breaches verified	1	1	5
Still under investigation at year-end	n/a	4	1

## Collaboration with Industry

When Chorus established our Worker Welfare programme, we committed to collaborate with industry and government on the issue of worker exploitation. We continue to engage regularly with the Ministry of Business Innovation and Employment, the Labour Inspectorate, and Immigration New Zealand.

Chorus is an active participant in the Collaborative Advantage Group, a working group comprised of New Zealand business participants. Hosted Deloitte, the group shares insights and drives collective action to collaboratively address the social and environmental challenges common to all.

## Engagement with key suppliers

Beyond our Field Service Provider partners, we have continued to engage with key suppliers to better understand their risks and responses to modern slavery.

We believe that our suppliers share our commitment to the proper treatment of all workers and that they are taking steps to address the risks of modern slavery. Many of our suppliers report under the UK reporting regime and several are also submitting statements under the Australian Act.

We continue to refine our management of modern slavery risks during the procurement lifecycle: including pre-qualification; robust procurement practices; strong standard terms and conditions; an ongoing audit regime focussed on our field workforce to assess supplier performance; and directly asking how suppliers in high-risk industries engage their workers and for assurance that those workers receive the benefit of all relevant employment laws.

## The effectiveness of our actions to address modern slavery risks

Our processes to assess the effectiveness of our actions to address modern slavery risks span right across Chorus, from field visits by our operational teams to Board risk and assurance oversight, including:

- assessing participation and responses to our Ethical Voice surveys
- targeted field workforce supplier audits to assess conformance with our terms and conditions
- review and reporting on use of our whistle-blower processes, including investigation outcomes
- our Board having an approved policy, and supporting framework, outlining how risk is managed at Chorus. The Board's Audit and Risk Committee meets quarterly and, among other items, discusses the risks Chorus faces in achieving its strategic goals and how these are being managed

## Consultation within Chorus

This statement has been prepared with input from functional teams within Chorus, and approved by, and in consultation via, the principal governing body of both reporting entities, namely the shared Board of directors of Chorus Limited and Chorus New Zealand Limited.

## Approval

This statement was approved by the Board of Chorus Limited and Chorus New Zealand Limited on 23 October 2025.



Mark Cross

**Chair**

**Chorus Limited**

**Chorus New Zealand Limited**