



2021  
Modern Slavery  
Statement

## About this report

This is the Modern Slavery Statement of NBN Co Limited and its controlled entities for the reporting period 1 July 2020 to 30 June 2021.



### Reporting entity

This is the Modern Slavery Statement of NBN Co Limited ABN 86 136 533 741 and its controlled entities for the reporting period 1 July 2020 to 30 June 2021.

The relevant controlled entities of NBN Co Limited for the reporting period were:

NBN Tasmania Limited and  
NBN Co Spectrum Pty Ltd

These controlled entities were not operational and were liquidated during the reporting period and therefore did not meet the reporting threshold set out by the *Modern Slavery Act 2018* (Commonwealth), ('the Act').

Throughout this statement, NBN Co Limited and its controlled entities are referred to as 'NBN Co' or 'the Company'.

### Preparing this statement and consultation

This statement has been prepared in accordance with the *Modern Slavery Act 2018* (Commonwealth) ('the Act') and outlines the risks of modern slavery across NBN Co's operations and supply chains, its response to these risks, and how the NBN Co evaluates the effectiveness of its response.

### NBN Co commitment to tackling modern slavery

The Act defines modern slavery as situations where coercion, threats or deception are used to exploit victims and undermine their freedom.

Specifically, the Act defines eight types of serious exploitation as:

- trafficking of persons
- slavery
- servitude
- deceptive recruiting
- forced marriage
- forced labour
- debt bondage
- worst forms of child labour.

At NBN Co, the responsibility to mitigate the risk of modern slavery is taken seriously. NBN Co has in place processes to manage modern slavery risks and is committed to ongoing improvement.

During the reporting period NBN Co has acted to better understand modern slavery risks in its operations and supply chains, introduced and updated relevant policies and procedures, and improved its internal capability and knowledge.

### Legal statement

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NBN Co Limited has its registered office at Tower 5, Level 14, 727 Collins Street, Docklands VIC 3008.

ABN 86 136 533 741

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In the spirit of reconciliation NBN Co acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

## About NBN Co: structure, supply chain and operations

NBN Co is committed to responding to the digital connectivity needs of all Australians, working with Industry, governments, regulators and community partners, to lift the digital capability of Australia.

### NBN Co's purpose and structure

NBN Co Limited is wholly-owned by the Commonwealth of Australia as a Government Business Enterprise (GBE), incorporated under the *Corporations Act 2001* (Cth) and operated in accordance with the *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act).

As a GBE, the principal responsibility of NBN Co is to build and operate the National Broadband Network in accordance with the Commonwealth Government's Statement of Expectations (SoE), 26 August 2021<sup>1</sup>.

The Company's key objective is to support Australia's digital economy and enhance social connection by creating opportunities for communities, governments and industry to drive digital adoption and innovation.

As the nation's main broadband wholesaler, NBN Co provides access to all Retail Service Providers (RSPs) on a non-discriminatory basis. This approach is intended to level the playing field in the Australian telecommunications industry, enhancing competition and innovation, and providing greater choice for customers<sup>2</sup> across the country. It is through RSPs that customers connect to the **nbn**<sup>TM</sup> network for access to high-speed internet. NBN Co is delivering high-speed broadband to customers across Australia over an area of more than seven million square kilometres. Working in collaboration with industry partners, NBN Co is committed to connecting Australian homes and businesses so they can access the social and economic benefits that fast broadband enables.

### NBN Co's value chain

The **nbn**<sup>TM</sup> network consists of a Multi-Technology-Mix of broadband access technologies including Fibre-to-the-Node, Fibre-to-the-Premises, Fibre-to-the-Curb, Fibre-to-the-Basement, Hybrid Fibre Coaxial (HFC), fixed wireless and **nbn**<sup>TM</sup> Satellite Services connected to access seekers via national transmission and traffic aggregation networks.

NBN Co undertakes activities that include network solution development, systems solution development, network design, construction, service activation, service assurance, network operations, network and facilities management, corporate services, and product development and marketing. For more information on how NBN Co creates value see the [2021 NBN Co Annual Report](#).

### Operations

NBN Co's operating model consists of role-based (internal) workers and outcomes-based (extended) workers (EWs) to deliver core activities and corporate functions.

The *NBN Co Resource Engagement Policy* lays out how the Company manages role-based, and outcomes-based workers:

- **internal workforce:** as at 30 June 2021, NBN Co directly engages and manages approximately 4,900 workers consisting of Company employees and a small number of contractors (referred to at NBN Co as temporary staff augmentation (TSA)).
- **extended workforce:** large, indirect supplier-based workforce (approximately 9,400 as at 30 June 2021), comprising workers delivering a range of services to NBN Co such as constructing and maintaining the network, business process, IT support and facilities management services. These services are governed by contractual agreement with service providers.

NBN Co's internal and extended workforce undertake work activities that include:

- network planning and design
- civil and telecommunications construction
- network assurance and service delivery
- facilities management
- corporate services
- product development and marketing.

NBN Co is domiciled solely in Australia with most operations taking place in Australia. The Company's Australian operations are supported by some overseas-based suppliers and their workers who provide services to NBN Co including business process and IT support.

### Supply chain

NBN Co actively manages the Company's suppliers, including identifying and managing contracts, its supplier database, and the goods and services that suppliers provide.

The Company has focused on developing strategic, long-term relationships with key suppliers in each of the Company's main spend areas. These key suppliers have mature corporate policies and business processes. NBN Co has communicated its values and expectations to these suppliers through the Company's [nbn](#)<sup>TM</sup> [Supplier Code of Conduct](#) document. NBN Co's supplier governance forums also support active conversations around operations, and supply chain management.

NBN Co's supplier base has remained steady in FY21 compared to the previous year. The Company utilised a network of approximately 3,300 suppliers during the reporting period that were mainly based in Australia. Most of the Company's total expenditure was with these suppliers. The main expenditure categories were:

- construction and maintenance of the network by Australian suppliers
- Network equipment
- IT Services, software and hardware.

Overseas suppliers are predominantly domiciled in the United States, Europe and Asia. However, many of these may have extensive global manufacturing and supplier networks that extend beyond their primary locations.

<sup>1</sup> <https://www.nbnco.com.au/corporate-information/about-nbn-co>

<sup>2</sup> Final downstream customers linked to NBN Co's Retail Service Providers (RSPs).

## Modern slavery risks

To better understand its modern slavery risks, NBN Co completed risk assessments of the Company's operations and supply chain.

### NBN operations

NBN Co's internal workforce in its operations is considered as being a lower risk of modern slavery due to high skill levels, a mature regulatory environment and largely office-based roles. These workers are employed in Australia through well-regulated industrial arrangements and TSAs are employed through well-established labour hire processes.

### NBN's supply chain risks

During FY21, NBN Co conducted a comprehensive risk assessment across its supply chain, that include these key steps:

- improving the Company's understanding of NBN Co's supply chain categories
- analysing inherent risks using a large number of reference points such as geography, labour intensiveness and industry sector
- combining all these factors and performing deep-dive analyses.

Steps 1 and 2 of the supply chain risk assessment identified the following:

- Inherent risks of modern slavery in the company's supply chain during FY21 were rated low to medium for approximately 98% of NBN Co's suppliers<sup>1</sup>.
- Modern slavery risk profiles were mapped across NBN Co's supplier portfolio and these are reflected in table 1 for supplier types that were rated as medium risk or higher.
- There is a risk that the Company may contribute to modern slavery in the case of indirect suppliers to NBN Co, particularly those with an inherent risk score of medium or above.

1. 'Low-medium' is generally considered low risk, which is consistent with Australia's risk ratings regarding modern slavery.

Figure 1 - Supply chain risk assessment process



NBN Co is better positioned to mature its approach and drive targeted programs to mitigate modern slavery risks in the Company's supply chain.

Informed by the supply chain risk assessment, NBN Co selected several suppliers that represent key risk areas, for further deep-dive risk analysis. The suppliers selected reflect different product and service categories and the Company's analysis focused on their supply chains rather than the geographic locations of the selected suppliers head offices, in order to understand where the products and services were originally provided or manufactured.

This analysis has informed NBN Co's priority areas for further due diligence at different supplier tiers. Overall, through the assessment performed during FY21, NBN Co is better positioned to mature its approach and drive targeted programs to mitigate modern slavery risks in the Company's supply chain.



Figure 2 - NBN Co's supply chain risks

	Network and IT equipment 	Business outsourced services 	Security and cleaning services 	Uniforms and PPE 	Network construction 
Primary region of origin	Asia, Europe	Asia	Australia	Asia	Australia
Description of goods or services provided	This is the equipment that is used to operate the <b>nbn</b> <sup>TM</sup> network such as routers, switches and distribution units	Supply of outsourced services for business-related back office operations. A mix of Australian and offshore personnel, predominantly based in India, provide the related services	Supply of cleaning services to network infrastructure buildings, waste management, and security services for NBN Co premises	Manufacture of uniforms and personal protective equipment	Network construction, connection and maintenance work across Australia. Although, Australia is a lower-risk country for modern slavery risk, sections of the construction industry are considered to be potentially higher risk
Inherent modern slavery risk factors	<ul style="list-style-type: none"> <li>• Sector and industry</li> <li>• Geographic</li> <li>• Entity</li> </ul>	<ul style="list-style-type: none"> <li>• Geographic</li> <li>• Regulatory regime</li> </ul>	<ul style="list-style-type: none"> <li>• Sector and industry</li> </ul>	<ul style="list-style-type: none"> <li>• Geographic</li> <li>• Sector and industry</li> </ul>	<ul style="list-style-type: none"> <li>• Sector and industry</li> <li>• Entity</li> <li>• Low skills level</li> <li>• Labour intensive</li> </ul>

## Our approach to addressing risks of modern slavery

NBN Co's approach to addressing modern slavery risk focuses on understanding risks, maturing management frameworks and operationalising business processes to identify risks, take mitigating actions and, where necessary, remediation.

### Overall approach

The diagram below maps the Company's programmatic approach to building capability in managing modern slavery risks in its operations and supply chain.

The Company has commenced the program to establish the overall framework and is addressing a number of these areas.

### Business standards and policies for managing modern slavery risks

NBN Co policies and procedures are another essential part of how the Company identifies and addresses modern slavery risk.

### Resource Engagement Policy

The *Resource Engagement Policy* defines resource engagement types available at NBN Co and when it is appropriate to use each engagement type. These engagement types are intended to provide NBN Co with the flexibility it requires.

### Code of Conduct

The *Code of Conduct* contains NBN Co's expected standards of behaviour and applies to all direct employees, TSAs, Directors, and Extended Workers. The Code states that NBN Co will not tolerate unacceptable or disrespectful behaviour, including engaging in conduct that breaches or has the potential to breach relevant modern slavery legislation. In addition to complying with the standards, TSAs and Extended Workers are required to adhere to any other specific requirements provided for in NBN Co supplier contracts.

### Supplier Code of Conduct

NBN Co and its suppliers all have a part to play in conducting ethical and responsible businesses and ensuring human rights abuses are not permitted in the Company's supply chains.

The *nbn™ Supplier Code of Conduct* clearly articulates NBN Co's expectations of its suppliers in terms of responsible procurement, and is formally incorporated into all major contracts.

Suppliers are expected to ensure that their owners, employees, subcontractors, agents and other parties (including Group entities) comply with this code.

The *nbn™ Supplier Code of Conduct* is reviewed and updated each year to ensure currency to NBN Co's evolving expectations. During FY21, NBN Co reaffirmed expectations with suppliers and further updates will be shared across the supplier portfolio during FY22.

Figure 3 – NBN Co approach to building capability<sup>1</sup>



1. For illustrative purpose only – actual approaches and actions may vary from those listed.

### Whistleblower Policy

The NBN Co *Whistleblower Policy* sets out the process for individuals to disclose, either anonymously or otherwise, their concerns regarding potential wrongdoing, or suspected unethical, unlawful or undesirable conduct without fear of reprisal or detrimental conduct and with the support and protection of NBN Co.

As part of NBN Co's whistleblower process, NBN Co uses KPMG FairCall to assist in handling whistleblower disclosures - a reporting hotline administered by an external and independent third party (KPMG Australia).

### Managing Workplace Grievance Policy

The internal *Managing Workplace Grievance Policy* applies to all direct employees, TSAs and Extended Workers working at NBN Co. It provides clarification on what is recognised as a workplace grievance, the principles and processes that the Company will follow in addressing a grievance, and the possible informal and formal options for resolution.

### Grievance handling and remediation

All grievances from direct NBN Co employees, TSAs and Extended Workers are managed according to the internal *Managing Workplace Grievances Policy*. Complaints from a wide range of stakeholders in relation to NBN Co and NBN Co activities are addressed in accordance with the *nbn™ Complaints Handling Policy*.

The *Modern Slavery Allegation Handling and Non-conformance Investigation Checklist* defines the process for assessing and addressing any complaints or allegations of modern slavery practices.

### Raising NBN Co's internal awareness

#### Training in NBN Co policies and procedures

Training is key to ensuring NBN Co teams are aware of standards and policies, can identify and assess risks, and are equipped to respond to these risks. NBN Co conducts mandatory rolling training on the key policy suite, known as NBN Co Business Standards, including training on *Your Ethical Responsibilities (Fraud, Corruption and Whistleblower); Freedom of Information; Code of Conduct; and Risk Management*.

Direct NBN Co employees and TSAs are all expected to complete this training and extended workers complete this training during their onboarding orientation.

During FY21, NBN Co-specific modern slavery training was developed and completed by the Company's Procurement team. The training is specific to NBN Co and covers a wide range of key topics from modern slavery and NBN Co's commitment to dealing with it, as well as how to engage with suppliers in the Company's supply chain. Through this training NBN Co has built capability across the procurement function who support the business and are required to consider modern slavery risks in day-to-day procurement activities.

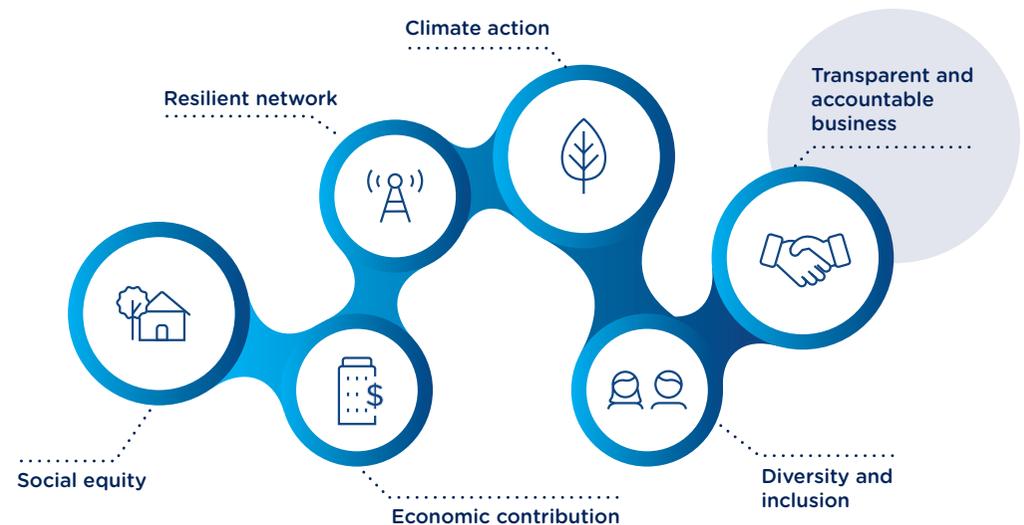
In addition, during FY21, training on modern slavery risks and reporting was also provided to NBN Co's legal team by an external service provider.

### Prioritising ethical operations and supply chain management

NBN Co's Sustainability Program focuses on six material topics, including 'Transparent and accountable business'. The Company's objective for this material topic is to demonstrate NBN Co's values through ethical and sustainable business practices.

A key action within the program is to mature the Company's ethical supply chain management approach which includes modern slavery. The related United Nation's Sustainable Development Goals are SDG 8 Decent Work and Economic Growth and SDG 12 Responsible Consumption and Production. For more details, see the [NBN Co 2021 Sustainability Report](#).

Figure 4 - Sustainability material topics





## Ethical operations and supply chain management

NBN Co's approach to risks in its supply chain is to identify, assess, mitigate and remediate risks based upon a due diligence framework that is supported by business capability, company standards and continuous improvement.

Modern slavery risks in the Company's operations, while potentially lower than in the supply chain risks, are mitigated through mature employment policies and practices, clear communication of NBN Co's values, standards and expectations and engagement with employee representative bodies.

### Due diligence in NBN Co operations

NBN Co recruits and manages role-based employees through processes and procedures that comply with relevant Australian employment legislation. NBN Co has robust processes for recruitment and employment contract management and procedures for direct employees. This helps to ensure the Company operates and recruits talent in a fair, open, and transparent process.

NBN Co has negotiated a series of Enterprise Agreements with relevant unions and the Company fulfils its contractual and legal obligations under these Agreements.

### Due diligence in NBN Co supply chain

NBN Co has implemented a framework for identifying, assessing, mitigating and remediating against modern slavery practices across its supply chain. This covers new supplier evaluation, the management of existing suppliers, allegation handling and ongoing monitoring.

## Supplier evaluation

During NBN Co's tender process, or before entering into a significant contract with a supplier, the procurement team assesses the supplier's human rights risks by issuing a set of questions using NBN Co's Supplier Risk Assessment Tool that has been updated during FY21 to include assessment of modern slavery risk. The Company has developed modern slavery risk classifications by supplier types. These inform the information requested from different suppliers. This process has been adopted for both new supplier onboarding and in contract renewals.

NBN Co's standard supplier contracts incorporate references to the NBN Co *Supplier Code of Conduct* which forms a contractual obligation on suppliers to comply to relevant legislation including the Act.

Suppliers with high-risk factors are subject to additional analysis and research to validate their risk profile. When warranted, NBN Co will include supplementary contract terms in addition to the requirements outlined in the *nbn™ Supplier Code of Conduct*; this may include the right to conduct third-party audits or request evidence of the business's risk management practices.

## Supplier management

Informed by risk assessment conducted during FY21, NBN Co has improved its supplier relationship management practice, such that modern slavery risk has been incorporated as a standing agenda item into the Supplier Relationship Management review process with selected strategic partners. In practice, it requires procurement managers and NBN Co's business units to actively seek more information from the suppliers and, where required, discuss

strategies, actions or initiatives to mitigate NBN Co's supply chain risks.

## Response to COVID-19

To ensure business continuity, NBN Co has improved the COVID-19 protocols and safety procedures established during the previous reporting period. This has enabled the Company's due diligence and governance arrangements and relationships with Suppliers to be maintained.

## Allegation and incident handling

During FY21 a *Modern Slavery Allegation Handling and Non-conformance Investigation Checklist* was developed and implemented. It defines a method to systematically review and assess any potential allegations or incidents raised in respect of modern slavery risks and comprises the following six-step process.

1. Raise awareness of modern slavery risks.
2. Identify allegations of modern slavery.
3. Assess the allegation.
4. Remediate where required.
5. Reflect on action.
6. Record and report modern slavery allegations or non-conformance.

## Ongoing internal monitoring, reporting and escalation

Managing modern slavery risks is a maturing risk management activity for NBN Co. The Company continually monitors risks through supplier performance reviews, research of publicly available resources and engagement with suppliers, and where risks are identified, NBN Co takes appropriate actions.

## CASE STUDY

### Pre-contractual risk assessment

During FY21 NBN Co initiated a relationship with a new provider from an industry that is considered higher risk due to industry and sector factors. As part of pre-contractual due diligence activities, the supplier was required to complete NBN Co's modern slavery risk assessment questionnaire and give supporting evidence of controls to assure their governance of modern slavery risk matched NBN Co's expectations.

## CASE STUDY

### Supplier engagement

In response to findings in the Australian Strategic Policy Institute's report "Uyghurs for Sale"<sup>1</sup> and related media allegations, NBN Co met with several key technology suppliers to discuss specific supply chain concerns and how each supplier responded to their sustainability and ethical sourcing criteria, including addressing any allegations and tightening governance. The Company reiterated its expectations around the *nbn™ Supplier Code of Conduct* and its commitment to eradicating modern slavery in its supply chain. The conversations have been incorporated into ongoing contractual governance sessions.

1. "Uyghurs for Sale" (2020), V.X. Xu et al., <https://www.aspi.org.au/report/uyghurs-sale>

## Assessing effectiveness

NBN Co's modern slavery governance is designed to ensure the effectiveness of NBN Co's management approach to managing modern slavery risks.



### Modern slavery governance and reporting

In FY21 NBN Co developed and implemented its modern slavery strategy to ensure that appropriate management systems were in place across the Company's operations and supply chain to minimise the risk, identify, mitigate and remediate any occurrences of modern slavery.

The management approach was matured enhancing the governance of modern slavery risk, implementing appropriate due diligence, establishing a remediation policy and program, and developing internal and external reporting plans.

### Management approach

The NBN Co Chief People and Culture Officer (CPCO) and Chief Financial Officer (CFO) supported by the executive-led Sustainability Governance Committee have governance and program responsibility for modern slavery risks managed within their business units for Operations and Supply Chain respectively.

The modern slavery reporting plan, strategy and annual workplan are reviewed, and monitored by the CPCO, CFO and the Sustainability Governance Committee who meet quarterly to provide sustainability leadership across NBN Co.

Furthermore, roles and responsibilities have been clearly defined across business units to manage modern slavery risks for both operations and supply chain. Also, a modern slavery working group is being established in the Procurement team to manage the Company's Supply Chain Modern Slavery Action Plan.

### Risk management

Responsibility for managing modern slavery risks for operations has been assigned to the People and Culture team, and the Procurement team for supply chain, and is reflected on their respective risk registers. The NBN Co Risk Management Framework encompasses quarterly risk reviews with business unit risk owners and the Company's Group Risk team. This framework requires that any incidents are reported to the Board Audit and Risk Committee.

### Reporting

Senior management in the Procurement team and People and Culture team are responsible for identifying and implementing actions to improve the Company's management of modern slavery risks. These programs of work are supported by the Environment and Sustainability team who report quarterly to the Sustainability Governance Committee.

The annual Modern Slavery Statement is reviewed and authorised by the NBN Co Board. It discloses details of the Company's risks, actions, remediation, and due diligence as well as governance, and management approach for modern slavery risks.

### Governance

The management approach and reporting are supported by NBN Co's three lines of defence model for managing risk and by assessing performance through audits, reviews and inspections of the supply chain and operations.

Having established executive oversight and responsibility during FY20, the Company's focus during FY21 has been on building capability and developing

processes to recognise and actively manage modern slavery risks in the supply chain through supplier reviews and the procurement process.

A risk mitigation plan for high-risk suppliers that incorporates ongoing engagement and reviews of the identified risks was also developed and is being implemented.

### Assurance

During this reporting period, NBN Co reviewed supplier management policies and processes.

### Supply chain

New suppliers, and suppliers renewing agreements, were required to provide details of their modern slavery risk management processes and policies in their responses to Request for Proposals during FY21. This is now standard procedure for new supplier evaluations.

On occasions where it is appropriate, NBN Co will conduct audits within its operations and supply chains to assess whether legal obligations are being met.

### Allegations and grievances

NBN Co reviews complaints, grievances and allegations received via employee and whistleblower channels and consults with representative unions to assess the risk of modern slavery across the Company's operations and supply chains.

### Controls

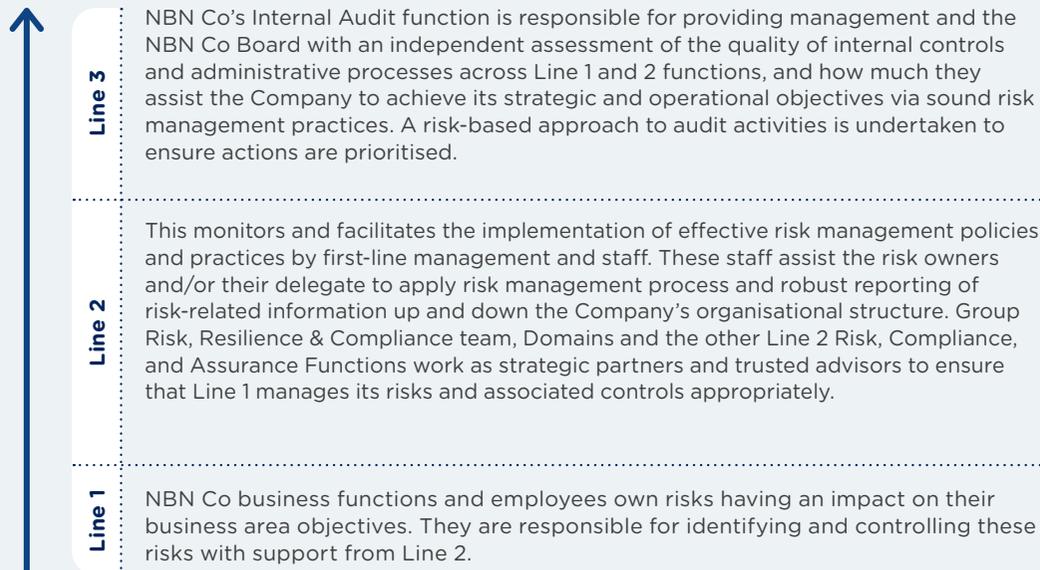
The Company continued to mature its modern slavery risk management processes in FY21 by:

- defining clear lines of responsibility and accountability for modern slavery risk management, policy, control implementation,

monitoring, allegation and remediation management, reporting and disclosure

- incorporating modern slavery into risk management frameworks
- classifying suppliers based on their modern slavery risk level and implementing a mitigation strategy aligned to supplier modern slavery risk classifications
- implementing the *Modern Slavery Allegation Handling and Non-conformance Investigation Checklist* to ensure that the response to a potential allegation is robust and thorough
- assigning responsibility for monitoring the effectiveness of risk controls
- developing organisational capability with regards to identifying, assessing, mitigating and remediating modern slavery risks and practices.

Figure 5 - Three lines of defence model



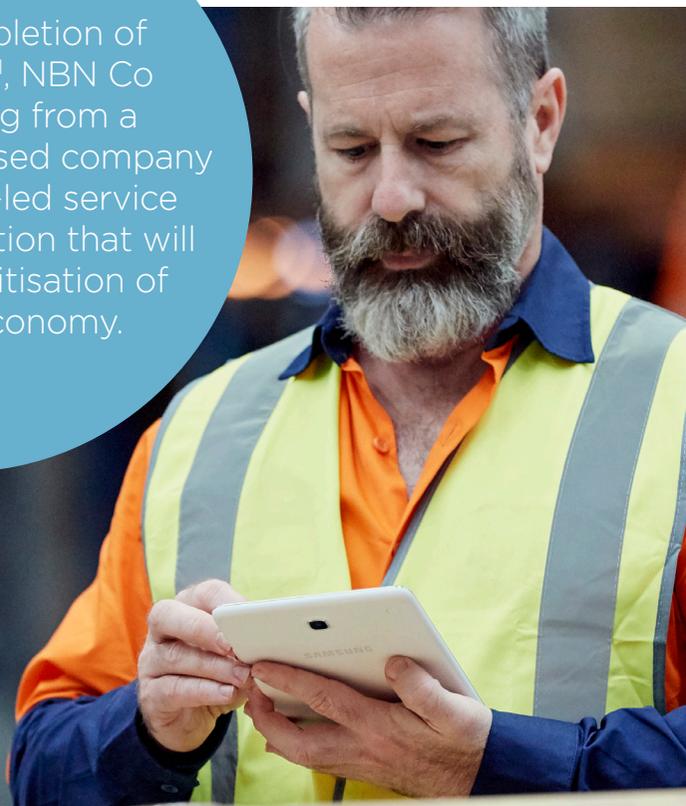
**CASE STUDY**

### Allegations and grievances

Grievance mechanisms and access to remedy are essential components of the Company's due diligence and management controls. During FY21, the Company conducted a review of a range of complaints, grievances and allegations received via employee and whistleblower channels, as well as from consultations with representative unions. This feedback was investigated and resolved as appropriate.

## Our future focus, consultation protocol, and approval

With the completion of the initial build<sup>1</sup>, NBN Co is transforming from a construction-focused company into a customer-led service delivery organisation that will help enable digitisation of Australia's economy.



### NBN Co plan for FY22 and beyond

NBN Co's modern slavery work plan will evolve in FY22 and future years to support the Company's commitment to continually improve its processes and effectiveness in managing the risk of modern slavery.

Key initiatives will seek to focus on:

- expanding internal programs to improve business knowledge and awareness of modern slavery, and develop toolkits to support the procurement team in identifying and mitigating modern slavery risks
- continuing to work towards expanding current programs with suppliers that strengthen contractual obligations and facilitate constructive dialogue with suppliers to identify and mitigate modern slavery risks
- conducting scenario testing of the updated *Modern Slavery Allegation Handling and Non-conformance Investigation Checklist* process to assess effectiveness
- exploring opportunities for industry collaboration and information sharing.

### Consultation

As NBN Co is the sole reporting entity for the purposes of the Act, and ceased to have control of any other entities during the year, it was not required to consult with other entities. The Modern Slavery Statement was, however, extensively consulted on internally, with input received from Employee Relations, Health and Safety, Procurement, Risk, Legal and Sustainability leads before being circulated to the executive team and the Board of NBN Co.

### Approval

This statement was approved by the Chief Executive Officer and Board of NBN Co Limited on 15 November 2021.

**Stephen Rue**  
Chief Executive Officer

1. NBN Co's build completion commitment was that all standard installation premises in Australia are able to connect to the **nbn**<sup>™</sup> access network as at the build completion date. This excludes premises in future new developments which will be an ongoing activity for the Company beyond the build completion date. It also excludes a small proportion of premises defined as 'complex connections' - which includes properties that are difficult to access, culturally significant areas and heritage sites - where connection depends on factors outside NBN Co's control such as permission from Traditional Custodians, and where network construction to allow such premises to connect will be an ongoing activity of NBN Co.



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