

Sustainability Report 2021



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Letter from the Chairman and MD & CEO

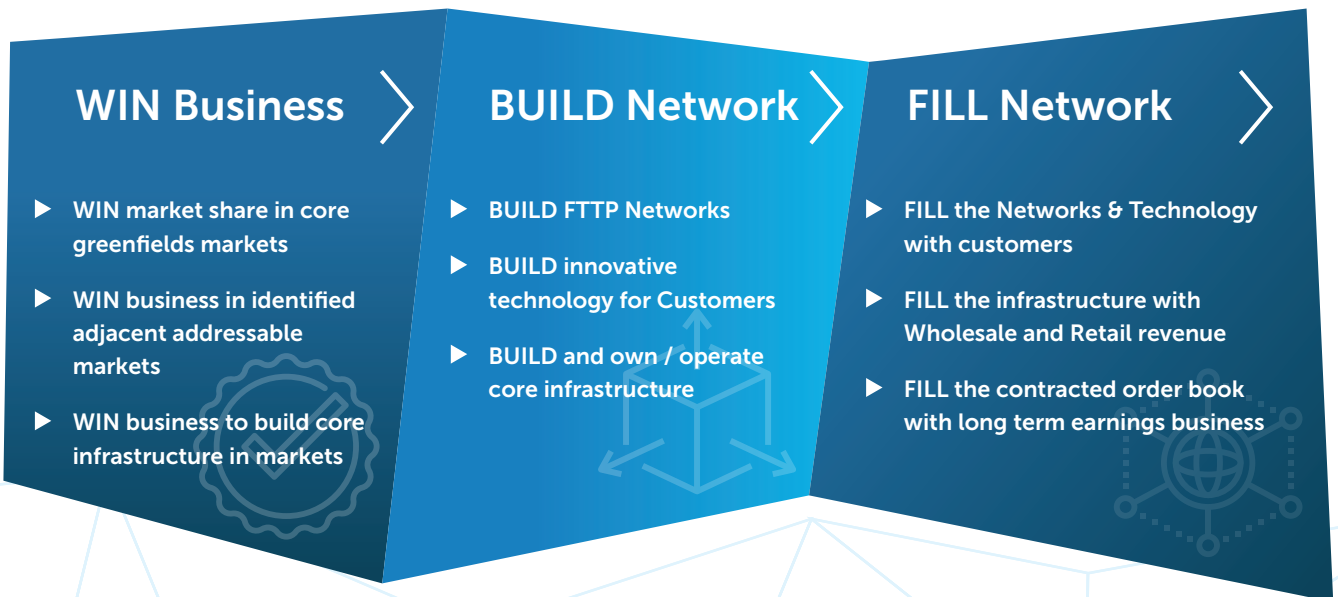


We are pleased to present Uniti's first Sustainability Report for the year ended 30 June 2021.

When we delivered our FY21 annual report, we highlighted how both FY20 and FY21 have been transformational years for the Company. During the period since ASX listing we have transitioned the Company from a small loss-making business to the largest non-government fibre-to-the-premise ("FTTP") operator with substantial positive operating profits and cash flow and a market capitalisation that allowed us to enter the S&P/ASX200 index in June 2021.

Our Company now has a significant contracted forward order book, which will deliver superior organic growth to underpin future shareholder returns. In FY21 we delivered shareholders a return of 133%.

We are well positioned to deliver strong organic growth in our business, not just from the roll out of already contracted business but by winning new business in our target markets. Our organic growth strategy, as outlined in our Annual Report this year, is very simple:



Given the tremendous growth that has been achieved over the past two and a half years, we have a lot of work to do to develop an appropriate sustainability strategy, reflective of the scale of business we now have. We acknowledge that we are at the very start of our sustainability journey and need a greater emphasis on our sustainability strategy over the coming years. With the scale that our business has become, it is time to focus on our environmental and social contribution. Uniti is committed to ensuring that it operates in a responsible and sustainable way, as we recognise this is fundamental to building, protecting and growing long term value for all its stakeholders.

We have sought and received informal feedback from shareholders, customers, suppliers and our employees on what they see as the key sustainability priorities for Uniti. This feedback has provided the foundation for the initial priorities we have determined to focus on for the coming years.

Our plan is to report in accordance with the GRI Standards (Core Approach) when we provide the FY22 version of this report.

As always, we sincerely thank each of our directors, executives, leaders and employees for their contribution in FY21. Without their hard work, professionalism, passion and dedication, we would not have been able to achieve the outcomes for shareholders that we have.

We invite you to review our sustainability activity and welcome your feedback via esg@unitigrouplimited.com.

Graeme Barclay

Michael Simmons

Introduction

In FY21, the integration of the various businesses Uniti acquired in 2019 and 2020, and establishing our future-ready operating model and systems, were key priorities for us. The COVID-19 pandemic meant this integration had to be undertaken against the challenging backdrop of restrictions, lockdowns and significant disruption to our previously accepted ways of working. Telecommunications, already considered critical infrastructure, became an essential service as Australians pivoted to working, schooling and entertaining at home, with this becoming the “new normal”.

We are pleased to say that Uniti team members rose to the challenges faced by Australians generally throughout the year, and continued to deliver exceptional customer service and support to customers across all business units within the Group.

Uniti is committed to ensuring that it operates in a responsible and sustainable way, and sees this as fundamental to building, protecting and growing long term value for all its stakeholders.

In 2019, Uniti set out its vision to “Build a great company for our customers, our people and our shareholders”.

Uniti’s core values at that time were:

We get things done

We are agile and adaptive. We have a laser like focus. No barriers, no politics.

We deliver for our stakeholders

We reward our customers, shareholders, partners and our people.

We are unique

We are niche. We are an alternative to the status quo.

We are one

We come from diverse places; we share common goals.

In mid 2021, as much of the integration of acquired businesses had been completed, we really began to focus on the unity of our purpose to align our priorities and our focus across the business using the tag-line “Uniti – a Group of One”, and under this banner we now propose to revisit our purpose and values to reflect the evolution of our Company over the past 2 years. Establishing the company culture that our people want to work in will be a key focus for us.

STAKEHOLDER ENGAGEMENT

Our stakeholders are our shareholders, our customers, our suppliers, our regulators, industry bodies and our employees. We engage with each of these groups regularly on topics and in a manner which is relevant and appropriate to each group.

Shareholders

We aim to ensure all shareholders receive information in an equal and timely manner and seek open dialogue with our shareholders through a variety of forums.

Our Annual General Meeting (“AGM”) provides shareholders the opportunity to have a say on the performance of our business, the directors of our Company and to raise matters important to them directly with our Board of Directors. We regard these meetings as opportunities for investors to get to know our directors and senior executives better and look forward to the return of face to face AGMs, without restrictions, to serve this purpose. Due to CoVID-19 restrictions on attendees, our 2020 and 2021 AGM’s have had to be held as hybrid events, at which we ensured investors had the ability to view the AGM through a webcast and also the opportunity to pose questions through our dedicated investor email address (investors@unitigrouplimited.com), a phone line for live verbal questions and an on-line question facility during the webcast.

From time to time we also hold Investor Days for our investors at which time our executive team share with investors their strategy and plans for the business. We see this as an opportunity for investors to better understand how we plan to continue to grow their company.

Our MD & CEO and our CFO also engage with institutional and equity analysts, brokers and major investors directly several times a year through various events, presentations and briefings. Our MD & CEO has also presented at various ASX Investor briefings.

Any presentation containing new information about the Company or its performance is released to the ASX in accordance with the ASX Listing Rules.

Employees

The COVID imposed challenges experienced in 2020 and 2021 have clearly demonstrated the value of a committed and engaged team to a company that is delivering for its stakeholders. Across this period, and despite the COVID-19 pandemic, various State

Introduction continued

lockdowns, work and travel restrictions, our employees have continued to show up every day for our customers, our shareholders and each other.

During this period, we also brought together employees from a number of acquired companies and sought to build a common identity that our people could relate to - "Uniti – a Group of One" - across businesses and locations. We have commenced engaging with our employees to re-define our values as a fully integrated Group. We plan to adopt our updated statement of values in early 2022 and reinforce, through that exercise, our commitment to our employees and to creating a place where our employees want to work and can continue to thrive.

We aim to keep our employees informed of the company's strategy, goals and achievements, through a variety of means including emails, our intranet and monthly briefings for all employees with our Executive team.

Throughout the Covid period, we implemented regular communications by video calling with our team members, and continued to provide opportunities on a daily, weekly and monthly basis, for employees to engage with their managers and the Executive team.

Customers

We have a wide range of customers, ranging from consumers of our retail broadband and voice services

(both residential and business) to large scale enterprises and developers who engage with us to design and build digital fibre infrastructure to enable them to be connected with superfast fibre broadband.

We aim to engage with each customer segment in a manner which is appropriate and relevant, ranging from email newsletters, customer town halls (for network migration planning), and dedicated account managers.

We focus on building relationships with our developer clients, seeking to form strong partnering arrangements for the long term.

Suppliers

We engage regularly with our major suppliers to ensure that our on-going relationship is one of a collaborative partnership, and that complies with our obligations to source business inputs from responsible and transparent sources. We recognise that in order to achieve better outcomes for our customers and our shareholders, we have to manage any supplier related risks through regular communication and having alternate supply sources available to meet shortages and delays.

Regulators

We aim to have an open, transparent and constructive relationship with all regulators.

Based on the feedback we have received from our stakeholders we have identified the following ESG topics that we consider to be most relevant to the Uniti business and which will guide our focus as we evolve our ESG strategy:

ESG Group	Material Topic	Definition
Environmental	Network resilience	Refers to maintaining a physically resilient network that can withstand severe weather events, or other causes of interruption, through advance preparation, design ingenuity and rigorous disaster response protocols, as well as technical resilience in the operation of a trusted, secure and reliable network.
	Waste management	Refers to reducing the generation of waste and ensuring proper management of hazardous waste. This includes resource efficiency, reuse and recycling, appropriate disposal as well as providing waste repurposing solutions.
	Energy Consumption	Refers to the consumption of power, fossil fuels, heating, cooling and/or steam, both within the organisation and outside the organisation from renewable and non-renewable sources and the reduction in the levels of consumption of non-renewable energy.

Introduction *continued*

ESG Group	Material Topic	Definition
Social	Compensation and remuneration	Refers to providing fair and equitable compensation across the organisation. This includes transparency in the compensation and remuneration policy and communication of our remuneration practices and outcomes in a clear and transparent manner to stakeholders of our company.
	Customer experience and satisfaction	Refers to providing market leading services and delivering exceptional customer experiences through streamlined processes, maintaining the highest quality, environmental and health and safety standards, and always keeping and meeting the diverse needs of all Uniti customers front of mind.
	Diversity and inclusion	Refers to committing to attracting and maintaining a diverse and inclusive workforce considering aspects such as diversity, inclusion, equal opportunity, disability, ethnicity, indigenous community, age, sexual orientation and local employment. Implementing policies, processes and cultural practices that support these aspects and creating a business focused on diversity of thinking, attitudes and behaviour, in order to solve for tomorrow's problems and progress the sustainability agenda.
	Health and safety	Refers to Uniti's need to provide a safe work environment for its employees, contractors, suppliers and the broader community through developing, implementing and monitoring robust management systems and a safety culture to reduce WH&S risks and maintain a safe working environment for all.
	Training and development	Refers to providing all employees with training and development programs to enhance knowledge and skills as well as create opportunities for growth. These programs also align employee capabilities with business needs and strategic objectives.
	Human rights	Refers to upholding human rights across all aspects of the business' operations encompassing labour rights, fair pay, working conditions, freedom of association and protection of privacy and elimination of modern slavery. Managing human rights obligations by respecting and promoting human rights in all Uniti's business activities. Human rights are defined and set out in the Universal Declaration of Human Rights and the ten principles of the United Nations (UN) Global Compact.

Introduction continued

Governance	Corporate governance	Refers to maintaining a robust governance framework that rewards high ethical standards and personal integrity, and which accords with the Corporate Governance Principles & Recommendations set out by the ASX. This includes committing to transparency for all of Uniti's stakeholders and ensuring business activities and culture are responsible, transparent and compliant with all legal and ethical obligations (i.e. anti-bribery and corruption, tax transparency).
	Anti-Bribery & Corruption	Refers to maintaining a zero-tolerance policy on bribery and corruption as well as maintaining a culture that supports the reporting of potential violations, including whistle-blower policies and anonymous hotlines.
	Data privacy	Refers to ensuring Uniti maintains robust policies and processes when storing, managing and using customer data, including compliance with data privacy regulation and best practice.
	Data security	Refers to protecting the information of Uniti's operations and customers, including implementing systems and infrastructure to safeguard data while minimising disruptions and ensuring the online experience is safe for everyone.
	Digitisation	Responding to and embracing the transformation of both business and society due to emerging technologies such as artificial intelligence (AI), blockchain, and automation.
	Public policy	Refers to managing participation, engagement and involvement in any public policy development or lobbying, including stances or avoiding any political activities that contradict Uniti's public positions.
	Regulatory compliance	Refers to ensuring compliance with all relevant regulation including ability to adapt, respond to and influence the regulatory environment impacting Uniti's position in, and opportunities available from, the industry.
	Supply chain	Refers to transparency of Uniti's supply chain operations and managing the risks and opportunities within the supply chain, including human rights, privacy, conflict minerals, health and safety, and environmental compliance. Engagement with suppliers will help determine the environmental impact of Uniti's extended supply chain and improve responsible procurement practices.

FY22 Priorities

Priority ESG Issue	Proposed Commitment	Initiatives	Suggested Metrics
Environment	<ul style="list-style-type: none"> ▶ Reduce our carbon footprint across the Group 	<ul style="list-style-type: none"> ▶ Undertake current energy consumption assessment ▶ Publish carbon emissions from our network operations, data centres & offices, vehicle fleet and air travel ▶ Develop strategy to reduce footprint through offset programs, utilising more efficient technologies, reduction in travel 	<ul style="list-style-type: none"> ▶ Reduction in our scope 1 and 2 carbon emissions (see http://cleanenergyregulator.gov.au/nger/about-the-national-greenhouse-and-energy-reporting-scheme/greenhouse-gases-and-energy)
Network Resilience	<ul style="list-style-type: none"> ▶ Maintain the integrity of our fibre network so that it is able to deliver high speed broadband services ▶ Upgrade the fibre network to enhance performance 	<ul style="list-style-type: none"> ▶ “Need for Speed” – Investment in network upgrades to deliver faster broadband services universally ▶ Undertake trials of new equipment configurations to validate the increase in speeds available to customers ▶ Upgrade of HFC network to new and more efficient technology ▶ Define internal posture for Critical Infrastructure network security performance 	<ul style="list-style-type: none"> ▶ Number of hours of network interruption ▶ Number of severe infrastructure damage incidents (and near misses) ▶ Number of network security incidents (and near misses) ▶ Percentage of network capable of delivering 100Mbps, 500Mbps and 1Gbps
Customer Experience	<ul style="list-style-type: none"> ▶ Best in market, high levels of customer satisfaction 	<ul style="list-style-type: none"> ▶ Continue process of automation, simplification and digitisation ▶ Develop a formal customer engagement framework and establish customer satisfaction metrics to give a voice to our philosophy on looking after our customers 	<ul style="list-style-type: none"> ▶ Overall satisfaction score ▶ Customer strategic satisfaction ▶ Customer complaints received

FY22 Priorities *continued*

Priority ESG Issue	Proposed Commitment	Initiatives	Suggested Metrics
Diversity, Inclusion and Work Culture	<ul style="list-style-type: none"> ▶ Build a diverse and inclusive workforce that is highly engaged ▶ Achieve gender pay equity 	<ul style="list-style-type: none"> ▶ Flexible Work Practices policy ▶ Religious holiday “swap” program ▶ Establish D&I committee to develop our D&I Action Plan ▶ Establish strategy for increasing diversity through recruitment practices 	<ul style="list-style-type: none"> ▶ Amount of voluntary employee attrition within the business in a year ▶ Number of female employees (by level) and on the Board ▶ Gender pay equity - establish baseline
Employee Reward & Retention	<ul style="list-style-type: none"> ▶ Establish workplace learning & development programs ▶ Ensure we have market based remuneration policies 	<ul style="list-style-type: none"> ▶ Establish strategy for workplace learning & development programs ▶ Ongoing monitoring of market trends and salaries 	<ul style="list-style-type: none"> ▶ Reduction in our scope 1 and 2 carbon emissions
Social & Community engagement	<ul style="list-style-type: none"> ▶ Maintain our social licence to operate by supporting the communities in which we operate 	<ul style="list-style-type: none"> ▶ Committing to Platinum membership of the Telco Together Foundation and initiatives, including Small Change Big Change (“SCBC”) ▶ Investing in projects which are strategically aligned with our larger customers and which have mutually beneficial outcomes as % of revenue ▶ Provide volunteering opportunities for employees ▶ Introduction of a Workplace Giving program ▶ Develop Reconciliation Action Plan to support communities in our developments 	<ul style="list-style-type: none"> ▶ SCBC take up rate as a % of customers ▶ Social investment as % of revenue ▶ Number of Volunteering hours donated by team

FY22 Priorities *continued*

Priority ESG Issue	Proposed Commitment	Initiatives	Suggested Metrics
Health, Safety and Wellbeing	<ul style="list-style-type: none"> ▶ Ensure we provide a safe environment for workers, contractors and visitors. 	<ul style="list-style-type: none"> ▶ Develop Uniti Mental Health Strategy and associated well-being programs ▶ Implement HSE protocols and procedures throughout Company 	<ul style="list-style-type: none"> ▶ Number of Lost Time Injuries ▶ Number of Serious Injuries ▶ Number of Near Misses ▶ Score for Uniti support for employee mental health and wellbeing within the employee engagement survey
Corporate Governance	<ul style="list-style-type: none"> ▶ Compliance with the ASX Corporate Governance Principles and Recommendations (CGPR). 	<ul style="list-style-type: none"> ▶ Business as usual 	<ul style="list-style-type: none"> ▶ Uniti's Corporate Governance Statement is available on its website. ▶ Report once a year against CGPR – to be released with Annual Report.
Human Rights and Modern Slavery	<ul style="list-style-type: none"> ▶ Commitment to ensuring that no modern slavery occurs in our business or supply chain. 	<ul style="list-style-type: none"> ▶ Implement Supplier Code of Conduct ▶ Publish first Modern Slavery policy 	<ul style="list-style-type: none"> ▶ Number of modern slavery and/or human rights breaches relating to Uniti ▶ Number of modern slavery and/or human rights breaches relating to Uniti's suppliers
Data Privacy and Security	<ul style="list-style-type: none"> ▶ Commitment to excellence in data privacy and security 	<ul style="list-style-type: none"> ▶ Implement Information Systems Management protocols in accordance with ISO standards ▶ Implement and periodically test readiness for a business interruption event 	<ul style="list-style-type: none"> ▶ Number of privacy incidents ▶ Number of business interruption cyber incidents

Environment

As a builder and operator of fibre broadband networks, Uniti's key areas of focus in this area centre around two key elements - climate change and waste. In the case of climate change, we aim to align our business with the key objectives of the Glasgow Agreement and in particular this means we aim to reduce our own emissions as well as demonstrate how using our technologies helps to reduce emissions within the broader community.

Uniti is certified to ISO 14001 Environmental Management Systems. This management system framework and associated processes assist us in continually assessing our environmental impact, setting targets and monitoring our environmental performance for continuous improvement.

Uniti's employees have undergone environmental awareness training and adopt environmental initiatives as part of their daily routines.

Our Networks – Adoption of XGS-PON and GPON technologies

Uniti builds and maintains optical fibre networks that are operated and used in an ecological and sustainable manner. The delivery of multiple communication services through a single fibre optic cable provides monetary savings to the communities we service, and also minimises the impact on the environment.

In a move that will reduce carbon emissions, Uniti has decided to adopt FTTP XGS-PON and FTTP GPON technologies in the construction of its network infrastructure. This technology consumes significantly less power than FTTN DSL (copper), HFC networks and cellular Fixed Wireless Access (FWA) services to deliver the same service to an end user.

A European study performed by the Prysmian Group in November 2020, determined that GPON technology consumes the least amount of energy to provide broadband residential connections compared to VDSL and HFC DOCSIS. At the 50Mbps download speed tier, GPON consumed an average of 56 kWh/year per person, 37% less than HFC at 88 kWh/year per person, and 9% less than VDSL at 61 kWh/year per person. At faster broadband speeds (eg: 1Gbps download speeds which the majority of the Uniti wholesale network provides), the study concluded the percentage savings with GPON or XGSPON would be even greater than the legacy technologies.

GPON and XGS-PON are made of tiny fibres of glass and sand, and therefore also generate much smaller quantities of environmental waste than DSL and HFC networks which use copper and metal (which rust and need to be mined). DSL copper and HFC networks have an effective life of 20 to 30 years, after which these networks need to be replaced and disposed of via waste or some recycling. Fibre networks have a life of more than 50 years, therefore a lower environmental waste impact.

As Uniti integrates the networks it has acquired from other parties, including the Telstra Velocity network assets, Uniti intends to upgrade the existing legacy copper network technology with the FTTP XGS-PON and FTTP GPON technologies. Not only will this improve the broadband speeds for end users, it will also reduce the energy consumed on a per user basis across the Velocity network. Uniti will commence measuring power usage per home and per Gbps as part of its Scope 1 and Scope 2 measurement to enable carbon emissions to be calculated, and to then be in a position to measure improvements in environmental performance from our initiatives in the future.

Our immediate priorities are to:

- ▶ Measure the extent of our scope 1 and scope 2 emissions – and set appropriate targets for reducing these emissions;
- ▶ Identify and use more energy efficient technologies for use in our networks; and
- ▶ Consider and assess our approach to scope 3 emissions.

Underground Fibre Distribution Hubs

At Uniti, we have a motto of "Ban the Box" because we believe above ground Fibre Distribution Hubs (FDHs) are detrimental to the aesthetics of an estate. The traditional large above ground hubs are also vulnerable to damage and are not waterproof. With the exception of the Velocity network, all greenfield communities use underground splitters and connectors, and all our future builds are based on underground equipment, so even in a flood, our services continue to work. These advanced features enhance the sustainable efficiency of our networks. We also propose to further explore design enhancements which will improve energy efficiency and reduce the emissions associated with our FDH's.

Environment *continued*

Minimising Waste

Uniti adopts “REDUCE – REUSE – RECYCLE” as the basis of its environmental objectives, whether its reducing packaging from our suppliers, recycling IT hardware and recycling toner cartridges at our offices or reusing plastic water bottles. All Uniti employees have undergone environmental awareness training and adopt environmental initiatives as part of their daily routines.

Uniti has also reduced its environment waste contribution by moving most of its Group IT and OSS infrastructure to cloud providers, which results in Uniti no longer having to maintain servers in its own racks. This supports efficient recycling and disposal of hardware at end of life, as well as the sharing of capacity across third party infrastructure, delivering more efficient utilisation.

Uniti proposes to introduce further initiatives within its operations which will reduce the environmental impact of packaging including that used for customer related devices and accessories within its retail business.

Cyber Resilience

The resilience and sustainability of Uniti’s systems and networks is essential to ensure the continuity and availability of customer services and the security of customer data. Uniti is continually strengthening its information security posture through regular review of cyber security risks and threats, continual improvement of technology to prevent and detect cyber breaches and investment in its information security management systems. Uniti recognises that the most critical defence in its cyber security strategy is ensuring a culture of security awareness of best practice behaviour among its people and as such has a cyber security training and awareness program being rolled out.

Uniti is also currently undertaking the necessary steps to ensure its Security Management processes comply with the ISO27001 Information Security Management Systems standard.

Network Resilience

As part of the integration and migration of the networks acquired by Uniti and its subsidiaries over recent years, including the Telstra Velocity network assets, Uniti is in the process of upgrading its network to enable universal faster broadband services. This program, which will be phased and cover approximately 1100 communities has commenced and will deliver a number of tactical and strategic benefits for Uniti, including:

- ▶ Enabling 1Gbps speeds to the majority of Uniti’s end customers;
- ▶ Increasing the ability for Uniti to competitively market its services; and
- ▶ Upgrading existing legacy networks for improved stability (less outages).

Social Sustainability – Our Team

Health & Safety

The health and safety of our team members is of paramount importance to Uniti's leadership team.

This year we have introduced workplace health and safety committees across Uniti. These committees are held on a quarterly basis and represent a forum for our team members to raise concerns about any aspect of safety in the workplace. Uniti has a number of Health & Safety Representatives across field and corporate work environments.

Uniti seeks to foster a safety-first culture with hazard identification, incident prevention and the active management of all WHS issues being a key priority for Board, senior management and every team member. Uniti's goal is to have zero serious injuries across all of our activities.

Utilising our Safety Management System, which is certified to the ISO 45001 standard, we comprehensively manage all aspects of health, safety and the wellbeing of our employees and large body of contractors. This forms part of our Integrated Management System which is scalable for the future.

We are committed to achieving this through education, training, identification, prevention and monitoring across our team members and our contractor base, managed by our dedicated Head of Health and Safety. Uniti's Wholesale, Enterprise and Infrastructure business is certified to ISO9001 Quality Management System standard, and we are in the process of extending all ISO standards across the other parts of our business.

In the year to 30 June 2021, we did not experience any significant lost time injuries or have any reportable incidents within our workforce or our contractor database.

Any contractor that carries out work for Uniti is required to have their safety management system pre-qualified through our onboarding partners CM3. CM3 WHS assessors identify the level of risk their work involves and ensure they manage risk and the health and safety of their employees appropriately.

This commitment to providing and maintaining a safe and healthy work environment has faced some challenges in FY21 (and this has continued into the first half of FY22) as a result of the COVID-19 pandemic, various State lockdowns, work and travel restrictions resulting in the implementation of systems and

protocols to protect our own staff and contractors, customer and suppliers.

In addition to our COVID response, we have implemented strategies to renew and enhance general workplace safety management across both our operational and network installation projects. We continuously review and improve our systems to identify and implement improvements that are designed to achieve our ultimate goal of zero serious injuries.

As an employer, Uniti supports the Government's push to having a fully vaccinated population. Uniti provided its employees with special paid leave for them to go and get vaccinated.

We will continue to commit the resources necessary to maintain a safe working environment and ensure the ongoing health and wellbeing of our team and our business.

Mental Health

The mental health and well-being of our employees has become increasingly important to us as an organisation over the course of 2020 and 2021. At Uniti, we are committed to helping to support the overall mental wellbeing of our people. In October 2021, in recognition of Mental Health month, we launched our Uniti Mental Health Strategy, a sustained effort to be both reactive and proactive in managing the mental wellness of our employees. The initiative has the full support of Uniti Group's Board of Directors and is being implemented by our Executive Team as an ongoing programme of support, awareness and education by utilising external and internal resources.

Diversity and Inclusion

Uniti has always embraced the full scope of the diversity of its workforce, recognising the benefits and strengths that this brings. We recognise the benefit gained from having a diverse range of individuals involved in our organisation to bring a range of perspectives which is imperative to making good, balanced decisions that are in the interests of our Company as a whole.

We are therefore strongly committed to providing an environment in which each person is treated fairly and with respect, with equal opportunity and access to available opportunities. In respect to gender diversity, we are committed to implementing and supporting initiatives and processes to help facilitate equal gender participation and opportunity in our business.

Social Sustainability – Our Team *continued*

In the second half of 2021, Uniti submitted its first EOWA Gender Equality report, with the following data points:

Employment Status	Female	Male	Total	Percentage
Permanent Full time	54	193	247	21.9%
Permanent Part time	8	3	11	72.7%
Casual	1	3	4	25%

We are pleased to report that FY21 saw an increase in the number of women in the Executive and Senior Leadership team:

2021

Gender Diversity	Number of Females (2020)	% of total (2020)	Number of Females (2021)	% of total (2021)
Board	1	20%	1	20%
Executive team	1	20%	2	33%
Senior Leadership team*	1	11%	3	16%

* Senior Leadership team consists of the direct reports to the Executive team

In FY21, Uniti introduced paid parental leave for all primary caregivers, a benefit that had not previously been available to team members in the smaller organisations acquired by Uniti.

We plan to launch several key initiatives over the next few years which will result in stronger gender diversity across our workforce, specifically in the areas of recruitment, training and development and among our leadership teams. This includes the introduction of processes to support gender neutral recruitment, and supporting initiatives to help influence girls and young women to consider a career in STEM, in particular in telecommunications engineering. Uniti is also committed to developing and implementing an approach to ensuring gender pay equity across our workforce.

Uniti has adopted a flexible work policy which allows employees to negotiate flexible work arrangements which suit their individual requirements, so that they can better integrate their work with their other commitments and interests.

We also recognise the importance of valuing the many differences in background, culture and demographic characteristics of our team members. We take the opportunity to promote our multi-cultural and LGBTQI+ workforce through team events and celebrations.

Training & Development

Uniti continued to invest in the training and development of its team members through supporting training programmes and government traineeship schemes, including the Australian Apprenticeship Support Network. We also provide education support to a number of our employees undertaking further education and development through a partial reimbursement of costs and the provision of study leave.

We enhanced the range of services offered through our Employee Assistance Program, Lifeworks, to support our employees' well-being through the COVID-19 lockdown restrictions, particularly in Victoria where a large cohort of our team is based. This program provides 24/7 access to support if needed, and this is accessible by our employees and their families.

Anniversary Share Gift

On each of the two anniversaries of Uniti's listing (in Feb 2020 and in Feb 2021), permanent employees have received a gift of \$1,000 in Uniti shares, as recognition for their contribution to the substantial growth that we as a Company have enjoyed. As well as a signal of appreciation, we feel this also creates stronger alignment between our employees and our shareholders.

Social Sustainability – Our Team *continued*

Community Contribution and Engagement

In December 2020, Uniti elected to become a platinum member of the Telco Together Foundation (TTF). TTF is the Australian telco industry's only united charitable entity, endorsed by the federal government's Department of Communications.

TTF supports several significant social impact projects and organisations, primarily focussed on changing the lives of young Australians. TTF is a key driver in creating social change amongst the Telco Industry, supporting disadvantaged communities in the areas of Indigenous communities, mental health, and youth employment and disadvantage.

One of its key initiatives is Small Change Big Change, a fundraising program based on Workplace Giving, On-Bill Donations and Volunteering, with the goal of building resilient young Australians through a wide range of education and engagement programs designed to promote good mental health, a strong sense of identity and connection beyond connectivity. Uniti has agreed to participate in SCBC's On-Bill Donation program with 100% of the donations raised distributed to the Telco Together community charity partners, which it intends to roll out in the second quarter of the 2022 calendar year.

Our Chief Corporate Services Officer, Ashe-lee Jegathesan, serves on the TTF Advisory board as Uniti's nominee, with Jordan Grives (strategic advisor to Board and Executive) as her alternate.

Vaughan Bowen, Uniti's Executive Director, in 2012, founded, seeded and for 8 years served as Chairman of the Telco Together Foundation ("TTF"). Vaughan continues to serve as a TTF non-executive Director and benefactor.

Uniti Group executives and employees have also participated in other significant fundraising activities including STEPTember, The Push-Up Challenge (for Mental Health) and the St Vincent's CEO Sleep Out initiative (where one of our executive team successfully raised more than \$70,000).

Modern Slavery

Uniti will be submitting its first Modern Slavery Statement for the FY22 reporting period having passed the reporting threshold of annual consolidated revenue of \$100m during FY21. Given the rapid growth of the Company to date, we have not yet established a centralised procurement function, and functional responsibility for our supply chains remain within the relevant parts of the business. Accordingly, for practical reasons, our first priority has been to identify gaps in our policies and procedures and to publish key external-facing documents to ensure we have a strong foundation from which to build our Modern Slavery programme for the future.

In July 2021, we introduced a Supplier Code of Conduct which outlines the minimum expectations we have of our suppliers in relation to ESG issues, including Modern Slavery. The Code has been shared with our existing, new and potential suppliers and its terms and conditions which relate to Modern Slavery will be included in our updated standard purchase terms. Current and new suppliers will be required to acknowledge compliance with the Code.

We have put in place a staged approach to rolling out our supplier due diligence, focusing on our highest risk and highest volume suppliers for the current reporting period. To this end, we have undertaken and completed a desktop exercise to understand where the risks are highest, taking into consideration high risk country or sectors in our operations and supply chains, and the types of workers likely to be present in those chains. These will be the main focus for our FY22 work.



Our Customers

Wholesale

Under our “OptiComm” brand (which incorporates the LBNCo, OPENetworks and Capital Fibre Networks networks), Uniti designs, constructs, owns and operates fibre-based open access wholesale telecommunication networks in residential single dwelling unit (SDU) development estates (‘Broadacre’ estates), apartment or unit developments with multiple dwellings (MDU), retirement and independent living unit estates and commercial precincts and buildings.

We provide wholesale access to our networks to Retail Service Providers (RSP’s) who provide retail telecommunications, entertainment and other services to end user consumers (being residents in dwellings within the Broadacre estates and MDU complexes that are connected to our networks) and businesses, enterprises and other communities that reside and operate within the precincts we serve. We also provide ongoing support and maintenance services to these networks and provide other ancillary value add services, such as integrated building administration support networks (Integrated Communication Networks) that support building operations and other building services within mixed use developments, such as hotels and apartments, shopping centres, and other commercial complexes.

With >550,000 addressable premises (excluding Velocity networks) either connected, in construction or contracted and more than thirteen years’ experience, we work with developers, contractors, councils and partners to ensure on-time delivery. We have been building FTTP networks since before nbnCo was established.

We view each project or network we construct as unique, with the intention of partnering with developers to create smarter, more connected spaces for customers and residents to experience exceptional services and to meet the connectivity needs of precincts under development. In many instances, as part of our ongoing relationship with developers, a Technology Operations Board (TOB) with equal representation of both parties is formed, to have oversight of the Network and Technology which will be deployed over time to enhance the amenity of the Developments. We also continually seek to adopt the most current and up to date technology in the design and construction of our fibre networks.

Our wholesale network is managed by a sophisticated nationwide Operational Support System which processes end customer connections, monitors all the network elements and manages our regulatory requirements as an open access wholesale broadband provider. Our network is available more than 99.9% of the time, with our largest contributors to outages being third party power interruptions and third party backhaul provider link breakages. Our commitment to subscriber satisfaction is to connect customers to our network within 1 business day after order submission in urban areas and restore service connection issues within 1 business day of interruption. OptiComm’s CCID (Customer Connections Information Desk) team, its Networks Operations Centre and its Field Engineering team support our RSP’s, who we regard as our wholesale partners and a critical part of our customer ecosystem.

We are pleased to report that over the last 12 months, we have achieved an NPS rating of 78 for support provided directly to RSPs through our CCID team which supports end users getting their hardware installed for a new connection and also manages TV related Faults. We will be extending our NPS measurements to include our other RSP facing support teams in the next year.

We have identified a number of projects that, when implemented, will enhance the performance and resilience of our wholesale access network, and increase the speed end users can enjoy, and we will report progress on these projects in our FY22 report.

Consumer Retail

Over the last 12 months, we have made significant investment into the digital platform that supports our retail business’ sign-up processes, provisioning systems, user access platforms and customer portals.

We have been radically simplifying, increase transparency while simultaneously empowering our people to be best in class. Our digitisation program has delivered new and improved customer journeys, additional self-service enhancements while increasing its API /automation capability significantly.

To further support these initiatives the consumer business has made substantial investment into its data and business intelligence program. Our retail arm is transforming to being a data led business with key goals to be using predictive and prescriptive analytics in the near future.

Our Customers continued

We have had a strong focus on improving our customer experience and support, and have successfully improved our product review ratings across our various retail brands from an average of 1 to an average 3.5. We are proud of our team's achievements in this area but we're not done. We will continue to drive further improvements in these measures.

We are also planning to introduce further or additional customer satisfaction metrics including an NPS metric for our customer service and support teams.

In 2021, our retail brands commenced its participation in the Measuring Broadband Australia program which provides Australian consumers with accurate and independent information about broadband performance. This program measures the performance of NBN fixed-line and NBN fixed-wireless services.

Marketing Campaigns, Proposals and Tenders

Uniti adopts review processes to ensure that any marketing campaigns undertaken by both the retail and direct brands and any proposals or tenders submitted by its Wholesale and Infrastructure business unit comply with all relevant laws and codes, including the Competition and Consumer Act, Telecommunications Act and the Telecommunications Code of Practice.

Customer Privacy

Uniti is committed to maintaining the privacy of all personal information collected and retained within the business in accordance with our compliance obligations. Uniti is regulated by the Australian Privacy Principles. We have provided a detailed Privacy Policy on each of our customer-facing websites setting out the ways in which we collect personal information and what we use it for.

In accordance with the conditions imposed in our carrier licenses, Uniti and its relevant subsidiaries work with Court and Law Enforcement agencies in order to carry out lawful interception and provide subscriber metadata as required. Such information is produced only on presentation of a warrant subpoena.

Political Donations & Government Relations

Uniti has not made cash or in-kind political contributions to date. From time to time, Uniti and companies who have recently joined the Uniti Group including OptiComm Limited have, however, engaged consultants to represent Uniti's point of view through lobbying efforts. This has related in the main to the introduction and application of the Regional Broadband Services levy in 2020 and in relation to on-going Productivity Commission enquiries.

Financial Assistance received from Government

Uniti has not claimed or received any amounts under the Australian Government JobKeeper Payment Scheme, or any other amounts related to the COVID-19 pandemic or restrictions which have been imposed as a result of the pandemic. In 2019, Uniti received a grant from the South Australian Government as part of the Future Jobs Fund.

Ethics, Integrity and Governance

Uniti is committed to a sound corporate governance framework. We believe this is the foundation for a high performing organisation, and is critical to preserving and strengthening stakeholder confidence and enabling the organisation to be well placed to respond to a changing external environment.

Our corporate governance policies and charters are published on our website and are reviewed at least annually in reference to the Australian Securities Exchange's (ASX) Corporate Governance Principles and Recommendations of the ASX Corporate Governance Council (4th edition) (ASX Principles and Recommendations). Our latest Corporate Governance Statement (covering the period ending 30 June 2021) was released to the ASX on 24 August 2021, and is available at <https://unitigrouplimited.com/governance/policies>, together with copies of our Board and Committee charters, our Code of Conduct and various key governance policies.

The Board:

- (a) recognises that effective management of risk is an integral part of good management and vital to the continued growth and success of the Company;
- (b) recognises that the Company should implement formal and rigorous processes to independently verify and safeguard the integrity of its corporate reporting;
- (c) is responsible for the oversight of the risk management and control framework of the Company including the development of risk profiles as a part of the overall business and strategic planning process; and
- (d) has implemented a policy framework to ensure that the risks of the Company and its related bodies corporate are identified, analysed, evaluated, monitored and communicated within the organisation on an on-going basis, and that adequate controls are in place and functioning effectively.

The Audit and Risk Committee, as described in its charter, is responsible for advising the board in relation to the management of risks which may impact on the community or environment in which Uniti operates. This includes the review of the Company's risk management program, which the Committee undertakes several times a year. It must ensure that

areas of key risk have been identified, and that the appropriate internal controls have been implemented and are operating efficiently in all material respects.

Code Of Conduct

Uniti maintains a Code of Conduct for its directors, executives and employees. The Code of Conduct reflects the Company's values and requires that each person act honestly, in good faith and in the best interests of the Company; exercise a duty of care; use the powers of office in the best interests of the Company and not for personal gain, declare any conflict of interest; safeguard Company's assets and information and not undertake any action that may jeopardise the reputation of Company. The Code of Conduct also incorporates its anti-bribery and corruption policy.

Any material breaches of the Code of Conduct are required to be reported to the Board.

In 2021, Uniti adopted a new Whistleblower Policy, to encourage the reporting of conduct which may be illegal, unacceptable, unethical or undesirable through a confidential process with appropriate protections. Any of the Chair of Board of Directors, Chair of Audit & Risk Committee, Chief Corporate Services Officer & Company Secretary or Head of Legal may be notified on any reported conduct and are responsible for escalating any matter they consider appropriate to the Board. Previously this policy was incorporated in Uniti's Code of Conduct.

The Code of Conduct and Whistleblower Policy are further supplemented by a number of other policies which are intended to maintain integrity and confidence in Uniti and appropriately safeguard the reasonable expectations of Uniti's shareholders and other stakeholders, including:

- ▶ Communications and Continuous Disclosure Policy;
- ▶ Securities Trading Policy; and
- ▶ Risk Management Policy.

Ethics, Integrity and Governance [continued](#)

Compliance Education & Training

We have produced and implemented a number of compliance modules to our employees on their responsibilities and our guidelines in the areas most crucial to our operations, including our obligations under the functional separation undertaking which we have provided to the ACCC, privacy and information security, cyber-security risks, workplace health and safety, anti-bullying and harassment, misleading and deceptive conduct and our non-discrimination obligations under the Telecommunications Act.

Employees are required to complete those modules which are relevant to their area of work.

The training modules are refreshed annually. In 2021, we implemented an online training system through which all of the modules which we have developed for our specific requirements as well as those sourced externally (we have engaged with SAP Litmos for general training material) will be delivered to our teams.



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