

Creating our sustainable future today

SUSTAINABILITY REPORT 2022



bai communications



Sustainability is crucial to protect our planet and the people who live on it, securing our collective future.

As we continue to grow and build our vision of connecting places to create smart communities, we also understand it is our responsibility as an industry leader to ensure we design, build, and deploy our products and services in a sustainable way.

For the first time, this year we have incorporated ESG targets into our business strategy, and by introducing our first Sustainability report: "Creating our sustainable future today", we are declaring our commitment to building a better world for present and future generations, and for all our stakeholders.

BAI has full support for our approach to sustainability from our majority shareholder, Canada Pension Plan Investment Board, and a commitment from our Board to provide diligent oversight and advice on BAI's ESG journey.

BAI appreciates feedback towards our continual improvement in our sustainability reporting, please send feedback to: ESG@baicommunications.com

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We have identified where we can most contribute to a sustainable future and have started to set targets to drive our action

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Message from the Group CEO



“

I'm very pleased to share our first sustainability report. This is a big milestone for us at BAI Communications, as it not only reflects our vision to deliver advanced connectivity that can transform lives, power business ambitions, and shape the smarter communities of the future, but also shows our commitment to do so responsibly.

”

The last two years have been transformational for BAI. Thinking back to 2020, our 2025 business strategy seemed bold: expand our footprint, build three strong businesses (broadcast, transit and outdoor neutral host), and be a great place to work that can attract the best talent. With new wins across the board; our expansion into Europe; acquisitions in the US, UK and Ireland; expanded customer relationships; and a workforce that is now close to 1,000 strong, we believe our 2025 strategy is more than possible.

As we continue to grow and transform, we also understand that, as an industry leader, we have an obligation to all our stakeholders and shareholders to ensure we design, build and deploy our products and services in a sustainable way. That is why, for the first time, we have incorporated ESG targets into our business. Our successes are enabled by our majority shareholder, Canada Pension Plan Investment Board, from whom we receive ongoing investment in our future as well as full support and encouragement for our approach to sustainability.

In 2021 we joined the United Nations Global Compact and embarked on a materiality assessment. This led us to work towards five Sustainable Development Goals (SDGs), with our efforts described throughout this report. We recognise that there is still much to do, but I'd like to call out some examples of progress that make us very proud.

This past year, we entered into a long-term partnership with Sunderland City Council to deliver the foundation for the Council's ambitious goal of building the UK's most advanced smart city, leaving no one and nowhere behind. Also in the UK, we were awarded a 20-year contract with Transport for London to design, build and implement a city-wide 4G-enabled and 5G-ready integrated communications network that will deliver multi-carrier cellular, Wi-Fi, fibre and emergency connectivity services.

This network will fast-track London's evolution as a smart city. I am excited for our future opportunities in this space, as we join an ever-growing movement of businesses, operators and governments working together to solve local and global issues through the deployment of technology, seeking to improve communities and the environment we all depend on.

Climate action is also high in the industry's agenda. Recent years have seen unprecedented extreme weather-induced events such as bushfires, heatwaves, floods and major storms all around the world. In Australia, we have already achieved a 55% reduction in emissions since 2010 and have recently committed \$20 million over the next five years to install solar and batteries, as well as complete energy efficiency projects. We are now baselining our newly acquired businesses and developing carbon emissions reduction plans, with the aim of beating our target for net zero scope 1 and 2 emissions by 2040.

As part of SDG 10 on reducing inequalities, we are planning a global roll-out of equality training and processes, ensuring we are making progress on our diversity targets. Another focus area is improving our steps to ensure our contractors and supply chains have health and safety and anti-slavery controls in place.

There are many values that I admire of our BAI culture: our motivation to always do better, our openness with each other and our customers, and our courage to own and accomplish challenges. With our values as a solid base, this first sustainability report is just the beginning of our ESG journey as we focus our efforts on our priority UN SDGs, the UN Global Compact's Ten Principles, and our ambition for the years to come.

One question I ask myself and we must continue to ask each other: Are we being ambitious enough?

In asking this question, we push ourselves to be even more ambitious and achieve goals we might not have thought possible. May this report be a foundation we can build on when we ask that question next.

A handwritten signature in black ink, appearing to read 'Igor Leprince', written over a horizontal line.

Igor Leprince,
Group CEO, BAI Communications

Message from the Chair of the Board



BAI's outstanding growth and delivery on its strategy in the past year is the result of a strong leadership team and highly committed employees in every region where the company operates.



In 2022, businesses are expected to consider, manage and improve their impact on society and the planet.

This push for businesses to truly understand their impacts on society and the environment, and to develop and enhance their ESG strategies, has come from multiple stakeholders, including the public, shareholders, customers, employees and regulators. As a Board, our mandate has expanded to fulfill these expectations and provide diligent oversight and advice on BAI's ESG journey.

As BAI publishes this first sustainability report, we are confident and excited to be part of that journey and to discover what the BAI Group of businesses can achieve by 2025, by 2030 and beyond.

BAI is an extremely exciting organisation in a space that is on the cusp of huge expansion as the connected infrastructure and smart city agenda continues to draw the attention and prioritisation of cities and businesses around the world.

BAI's outstanding growth and delivery on its strategy in the past year is the result of a strong leadership team and highly committed employees in every region where the company operates.

We, as BAI's Board, commit to providing oversight to BAI's progress and continual ESG development and integration with BAI's strategy.

A handwritten signature in black ink, appearing to read 'Steve Pusey'.

Steve Pusey,
Chair, Board of Directors
BAI Communications



About BAI Communications (BAI)


BAI Communications is a world leader in shared communications infrastructure, pioneering solutions that empower our customers to advance their services, accelerate their networks and amplify their reach in the most efficient and cost-effective ways possible. Having long been at the forefront of network advancement, we are harnessing fibre, spearheading the transition from 4G/LTE to 5G, and preparing for 6G and beyond.

Our customers are telecommunications providers, governments, transit operators, enterprises, broadcasters and venues. We work closely with them to realise their communications visions, focusing not just on the immediate future, but on the possibilities offered by long-term partnerships. Our global operations span the United States, the United Kingdom, Ireland, Italy, Hong Kong, Canada and Australia, with BAI Group companies including Mobilitie, Signal Point Systems, Transit Wireless and Vilicom. Together, we're creating smarter communities for all.

SUSTAINABILITY AND ESG

We use the term 'sustainability' according to the 1987 United Nations Brundtland Commission definition: 'meeting the needs of the present without compromising the ability of future generations to meet their own needs.'

We also use the term 'ESG' (environmental, social and governance). Both terms may be used interchangeably in this document to represent our business efforts to meet the world's biggest challenges in terms of supporting a sustainable planet and a fair and just human existence.



Our global operations span the United States, the United Kingdom, Ireland, Italy, Hong Kong, Canada and Australia, with BAI Group companies including Mobilitie, Signal Point Systems, Transit Wireless and Vilicom.

Timeline

1923

In Australia, first AM radio stations and national television start broadcasting

2002

Macquarie Bank acquires NTL Australia, brands it Broadcast Australia, becoming the seed asset in the publicly listed Macquarie Communications Infrastructure Group (MCIG) fund

2009

The Canada Pension Plan Investment Board (CPPIB) acquires MCIG, including Broadcast Australia

2012

BAI Canada is established and signs an exclusive 20+ year agreement with the Toronto Transit Commission (TTC).

Broadcast Australia awarded Program Manager for Commonwealth Restack Program.

2016

BAI opens London office, focused on growing our Transit portfolio in Europe.

Transit Wireless completes 278 underground NYC subway stations with Wi-Fi service ahead of schedule.

2021

Transport for London (TfL) awards BAI a 20-year concession to deliver high-speed mobile coverage across the London Underground.

Sunderland City Council and BAI announce new partnership to create the UK's most advanced smart city.

BAI closes acquisition of US telecommunications infrastructure leader, Mobilitie, cementing its extended reach and services across North America.

BAI closes acquisition of Ireland-based Vilicom, a leader in designing, installing and managing high performance wireless networks, accelerating its growth in the UK, and Europe.

1999

Australia's transmission network is privatised (NTL Australia)

2007

Broadcast Australia becomes a majority shareholder in Hong Kong based Radio Frequency Engineering (RFE)

2010

The BAI Group is created as the parent company for the Broadcast Australia group of businesses.

BAI acquires a majority stake in Transit Wireless to design, build and operate communications infrastructure in the New York subway for the Metro transit Authority (MTA).

2015

The BAI Communications global brand is created

2020

Igor Leprince is appointed Group CEO of BAI Communications, embarking on an expansion vision for the group

2022

Mobilitie acquires Signal Point Systems, offering 5G connectivity to U.S. military bases.

BAI announces agreement to acquire digital infrastructure provider ZenFi Networks.

MTA awards Transit Wireless contract to support universal subway wireless connectivity plan.

BAI extends European footprint with expansion into Italy.

Developing our approach to sustainability

BACKGROUND

BAI began submitting our ESG performance in 2018 to the Global Real Estate Sustainability Benchmark (GRESB), a global ESG benchmarking organisation that validates, scores, and independently benchmarks ESG data. We have been utilising our results to identify and implement improvements, and our annual GRESB scores demonstrate year on year progress.

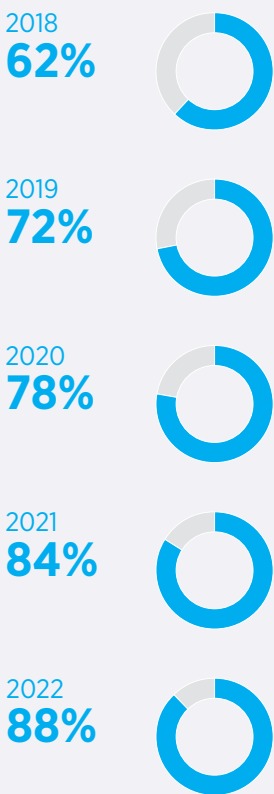
In 2019, BAI developed its 2020 to 2025 strategy with Safety, Wellbeing and Sustainability (SWS) as a key enabler, with a new Group-based role responsible for setting a consistent approach to SWS. The first two years focused on developing our global safety and wellbeing / wellness requirements within a Group-wide Framework.

In 2021, we reviewed our ESG initiatives, researched industry approaches and conducted our first all-employee engagement survey, which further supported prioritising the development of our approach to sustainability. We upskilled key employees in the area of sustainability, and undertook a materiality assessment.

BUILDING OUR ESG FRAMEWORK

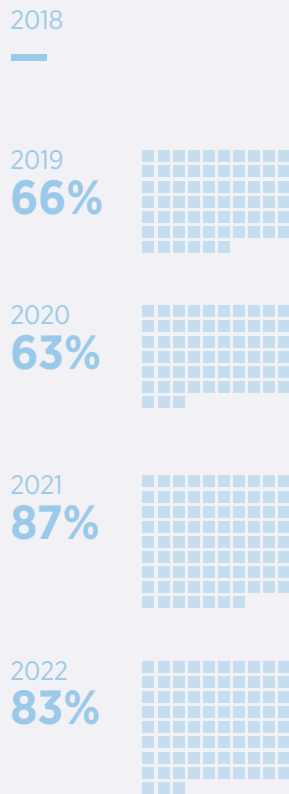
Following our materiality assessment we kicked-off our target setting, building our vision for BAI's ESG Framework.

GRESB Assessment¹

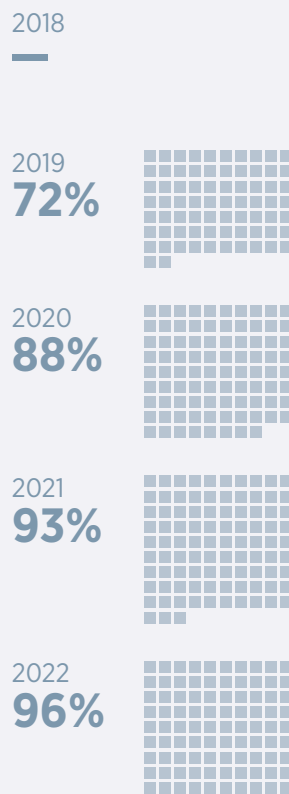


ESG breakdown²

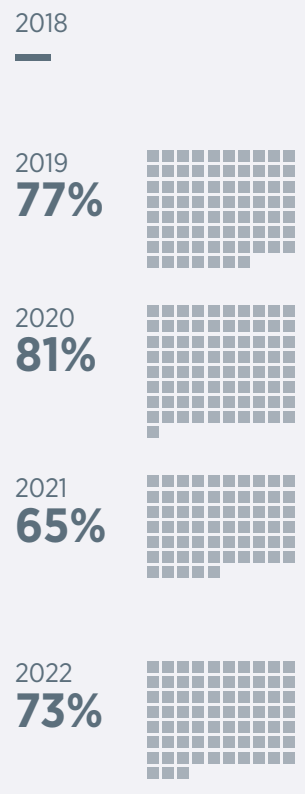
ENVIRONMENT



SOCIAL



GOVERNANCE



1. Based on BAI's submission (covering previous FY: FY17; FY18; FY19; FY20; FY21).

2. BAI have experienced decreases in our Environmental (2022) and Governance (2021) scores based on; GRESB evidence validation decisions, changes to the GRESB assessment criteria, as well as our understanding of the assessment criteria, re-evaluation of environmental targets, and choice of evidence provided, including external governance reviews.

MATERIALITY ASSESSMENT

Our materiality assessment determined our priority United Nation's Sustainable Development Goal's (SDGs), the areas where we believe we can and need to drive a positive societal and environmental change.

Our core business deliverables most strongly aligned with:

- SDG8 Decent Work and Economic Growth,
- SDG9 Industry, Innovation and Infrastructure, and
- SDG11 Sustainable Cities and Communities.



We also determined we had strong desire to make an impact in:

- SDG10 Reduced Inequalities, and
- SDG13 Climate Action.

Please see Appendix A for more on our materiality assessment, and Appendix B for more on the UN's SDGs.

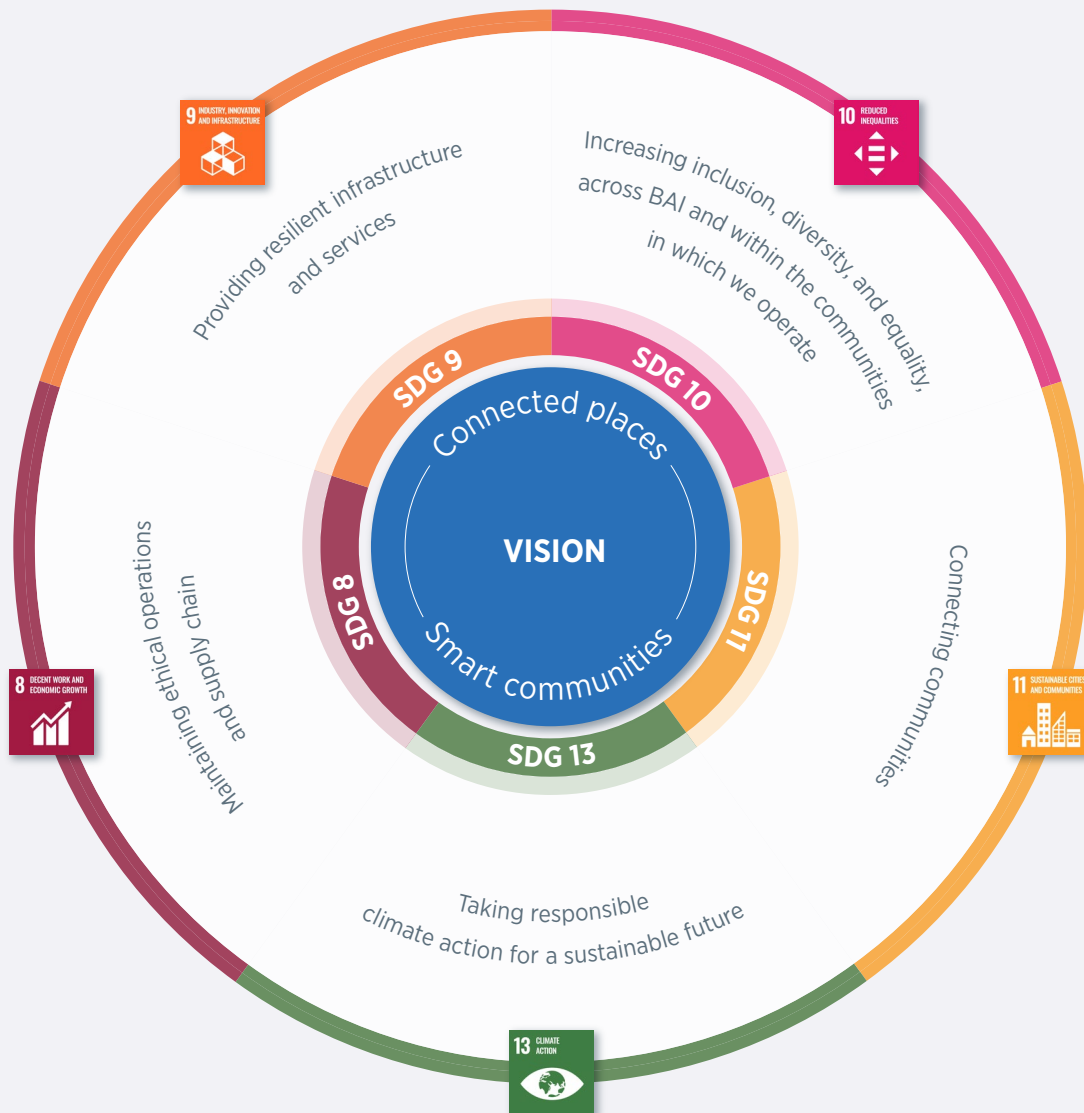
Our ESG framework

OUR ESG VISION

Our vision of connecting places to create smart communities continues to evolve, as does our ESG vision.

This report shares our commitments, in the form of targets requiring ongoing action, and initiatives we have already undertaken that support our vision.

Our vision is to connect communities via providing resilient infrastructure and services. Our vision is to maintain ethical operations and supply chain, and for responsible climate action, and positive action in inclusion, diversity and equality.



DELIVERING OUR ESG FRAMEWORK

As part of our building our ESG Framework, BAI has committed to 23 targets outlined on the following pages, and committed to reporting our progress annually, as a participant of the world's largest sustainability initiative, the United Nation's Global Compact (UNGC).

The UNGC calls for a principles-based approach to doing business, operating in ways that meet or exceed fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. As a responsible business, we acknowledge that good practices in one area do not offset harm in another.

We commit to progressing actions supporting the UNGC Ten Principles and our ESG vision across all our business activities. For further details on how we are aligning with the UNGC Ten Principles, please see Appendix C.

As part of our commitment to the UNGC, we provide this, our first annual report, outlining our ESG targets and sharing highlights of key initiatives that support our progress to date.

Maintaining ethical operations and supply chain



OUR VISION

Our vision is to ensure our employees and contractors operate ethically.

Employee engagement and health and safety are key indicators to operating ethically, and BAI focuses on creating a safe and engaging environment, encouraging employees and contractors to raise concerns and report safety issues, understanding these are opportunities to improve and learn from any gaps or mistakes.

Our vision is to responsibly ensure our supply chain is also operating ethically, reasonably verifying the implementation of anti-slavery and health and safety measures.



OUR TARGETS

To ensure our operations are ethical and responsible, we have set targets in the following priority areas:



Responsible procurement

IN 2023

- Develop a BAI global modern slavery supplier framework, including risk assessment and action plan
- Update all our procurement policies with BAI's global modern slavery supplier framework
- Assess all BAI suppliers (across all businesses) in reference to our modern slavery supplier framework, and launch our modern slavery action plan for high risk suppliers

IN 2024

- Enhance our health and safety and sustainable procurement standards (including understanding of our scope 3 emissions)
- Re-train all employees in our updated modern slavery awareness training



Employee engagement

IN 2023

- Achieve 75% engagement index

IN 2025

- Achieve 90th percentile or higher on global engagement benchmark



Health and safety

BY 2023

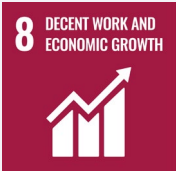
- Improve policy and framework with re-newed commitment from executive leadership team (including newly acquired businesses)
- Continue tracking health and safety reporting

IN 2023

- Commence group wide health and safety awards

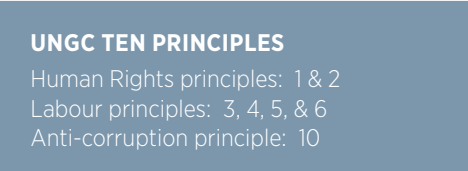
IN 2024

- Include contractors in health and safety awards
- Implement improved controls within contractor and supplier assessments and pre-qualifications



IN ALIGNMENT WITH SDG 8

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all



UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2
 Labour principles: 3, 4, 5, & 6
 Anti-corruption principle: 10

Maintaining ethical operations and supply chain

Current State



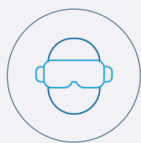
RESPONSIBLE PROCUREMENT

- Our initial responsible procurement efforts have focused primarily on modern slavery.
- All BAI group businesses have procurement policies that include modern slavery considerations based on supplier self-assessments.
- By August 2022, the training had been rolled out and completed by >97% of our workforce.
- Our procurement leaders held three working group sessions in 2022, focused on developing a risk assessment for modern slavery in the supply chain, setting targets and refining new modern slavery awareness training.



EMPLOYEE ENGAGEMENT

- In 2022 we achieved 93% participation in our engagement survey, up from 92% in 2021
- Our safety and wellbeing score of 87% is slightly lower than our score in 2021 (89%), with wellbeing in particular dropping versus safety. We continue to improve our health and safety, and wellbeing practices through our global framework updates
- Our engagement index score in 2022 was 71%. While this was lower than our score in 2021 (74%), this is equal to the global telecommunications benchmark¹. Engagement reflects the level of connection and commitment employees feel towards their role and organisation. Recently employee engagement has been included in updated scorecards, supported by action plans



HEALTH AND SAFETY

- Our executive leadership team has committed to health, safety, and wellbeing standards within our BAI group framework.
- We support an open and proactive safety culture and encourage reporting of all incidents and concerns.
- >200 incidents (including near misses) reported per year in FY19, FY20 and FY21
- 8 critical Health and Safety (H&S) near misses reported in FY22, 50% involving contractors
- 7 lost-time injuries from >1.93 million hours
- 3 internal safety audits with 29 corrective actions in FY22
- >1,000 Health, Safety and Environment (HSE) related inspections in FY22
- >1,000 HSE related training courses completed in FY22
- 29 H&S Committee members held 18 meetings in FY22
- 331 employees participated in month-long wellness event, STEPtember, supporting cerebral palsy alliance (2022)
- 20 trained mental health first aiders



1. Qualtrics engagement benchmark



IN ALIGNMENT WITH SDG 8

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2
Labour principles: 3, 4, 5, & 6
Anti-corruption principle: 10

Maintaining ethical operations and supply chain

Sharing our supporting initiatives

BAI UK

- In 2022, BAI in UK joined the Safety & Health in Fibre Telecoms (SHIFT) Group, - as part of the group, we'll be sharing our learnings and best practice, as we all work together with the aim of improving health and safety practices and standards across the UK fibre industry.
- Educational Partnership with King Solomon Academy, a diverse, multicultural school in the heart of the UK team community. We have hosted challenge days, work shadowing, careers roadshows and mentoring support to help build young people's knowledge and interest in STEM subjects. We look forward to enriching our partnership further in the coming year.
- Apprenticeships launch in the UK in September 2022 with a focus on building knowledge and skills in engineering and project management, we look forward to welcoming our inaugural cohort and helping them get a fast start in their career.

BAI AUSTRALIA

- With 752 transmission sites across the country, finding local talent is a key priority for BAI Australia. We estimate BAI in Australia contracts work to over 700 local contractors within a year.
- In 2021, we launched two new HSE awards: the HSE Innovation Award and the HSE Leadership Award. Nominations for the Innovation Award included a new drone inspection program, and the Leadership Award included a broadcast technician who discovered, reported, and managed a high-risk electrical near miss. The HSE awards were launched during National Safe Work Month, alongside events addressing mental health, fatigue and emergency preparedness, and teaching desk-based stretching exercises. BAI Australia CEO Peter Lambourne also hosted a virtual morning tea with our contractors.
- Our Employee Assistance Program ran three sessions in 2022: 'Thriving under pressure', 'Navigating workplace change', and 'Dealing with uncertainty'. The program also supported mental and physical health with R U OK Day, Gotcha4Life (with guest speaker Gus Worland), Movember, Steptember, flu vaccines, skin cancer screenings and our biggest morning tea ever.

BAI HONG KONG

- In 2021, BAI Hong Kong enrolled in the Mental Health Workplace Charter, becoming a Mental Health Friendly Organisation. We aim to create an inclusive and friendly workplace environment, promote mental wellbeing, and encourage active listening and communication.
- We have participated in the Hong Kong Transit Authority MTR's annual Safety Millionaire competition since 2017, and were awarded Certificate of Appreciation in 2019. Our Hong Kong team went further and developed their own internal safety game, rewarding employees for their knowledge and awareness on statutory and MTR safety requirements.

TRANSIT WIRELESS

- The JIRA ticketing system is a new addition to how Transit Wireless' Operations Team communicates work tasks. Safety, being a major part of that team, reviews all work prior to dispatch to assess risk, determine proper equipment, and personnel. Coupled with JIRA is a repository of Job Hazard Analysis documents covering nearly 70 different job tasks/categories and associated hazards.
- The documents are updated with observational field data to ensure risk information remains up to date in an ever-changing work environment. Since the launch of the JIRA ticketing process, the Safety team has reviewed more than 2,000 individual work tickets, enabling more safe and efficient operations.
- In August 2020, we participated in the NYC Summer Bridge Program, the United States' largest youth internship program. Summer Bridge connects a diverse group of students across all five New York City boroughs with internships at technology companies. We engaged 15-20 high school students to work on a company project over an intensive three-week period.



IN ALIGNMENT WITH SDG 8

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2
Labour principles: 3, 4, 5, & 6
Anti-corruption principle: 10

Increasing inclusion, diversity, and equality across BAI and within the communities in which we operate



OUR VISION

Our vision is to increase inclusion, diversity, and equality across BAI and within the communities in which we operate.

We have set targets for the next three years and have recently established our group-wide Inclusion, Diversity, Equality and Actions (IDEA) Council with 10 members. We look forward to sharing our progress in the years ahead.



OUR TARGETS

In the years ahead, we will continue to monitor and expand our diversity metrics to include ethnicity.

We will also consider additional opportunities to improve diversity, including part-time roles, flexible work arrangements, parental leave offerings and apprenticeships.



Inclusion, Diversity, Equality and Action

BY 2024

- Increase BAI Board female representation to at least two
- Workforce overall 26% female
- Senior leadership (CEO-2) 35% female

BY 2025

- Measure and report ethnicity across BAI
- Workforce overall 28% female
- Senior leadership (CEO-2) 40% female

BY 2026

- Increase overall ethnicity representation
- Workforce overall 30% female
- Senior leadership (CEO-2) 45%



Training

BY 2024:

- All employees have undergone psychological safety training

BY 2025:

- All employees have undergone unconscious bias training

The BAI Board is committed to increasing diversity, and commits to increasing female representation to at least two by the end of 2023.



IN ALIGNMENT WITH SDG 10

Reduce inequality within and among countries

UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2
Labour principles: 3 & 6

Increasing inclusion, diversity and equality across BAI and within the communities in which we operate

Current state

INCLUSION, DIVERSITY, EQUALITY AND ACTION

As of June 2022, our people included:



TRAINING

- BAI is planning training across all businesses to meet our 2025 targets. Transit Wireless completed unconscious bias training in 2020 to 2021 with over 95% of workforce attendance.

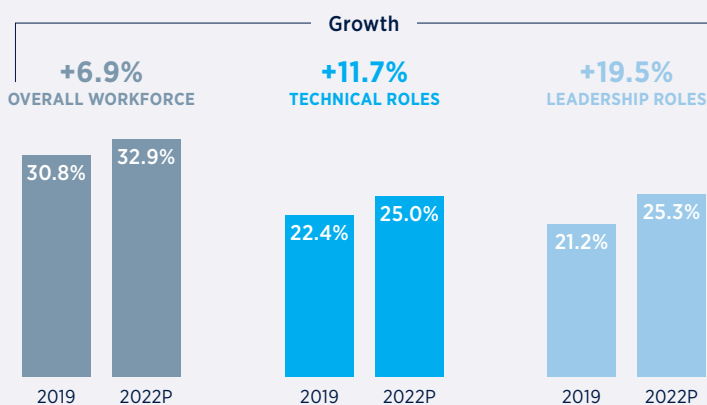
INCREASING DIVERSITY

- BAI considered industry benchmarks, including Deloitte's report (shown on right) when setting our targets.
- We have requested all recruitment agencies to provide gender balanced candidates.
- BAI is keen to understand our diversity such as ethnicity and LGBTIQ+, and continue to promote initiatives that support inclusion, diversity and equality.

IDEA COUNCIL

- In 2022, we established a group-wide Inclusion, Diversity, Equality and Actions (IDEA) Council with 10 members.

PROPORTION OF WOMEN IN LARGE TECHNOLOGY COMPANIES



Source: Analysis and projections based on published diversity reports from 20 large technology companies (with an average workforce of more than 100,000 employees).



IN ALIGNMENT WITH SDG 10

Reduce inequality within and among countries

UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2
Labour principles: 3 & 6

Increasing inclusion, diversity and equality across BAI and within the communities in which we operate

Sharing our supporting initiatives

BAI GROUP

- As part of our International Women's Day (IWD) initiatives, our Group CEO conducted two listening sessions with a cross-section of women in different roles from across our markets to hear more about their experience, potential barriers to inclusivity and ideas to drive positive change.

Following the listening sessions, we agreed to put in place a number of actions including updates to our recruitment processes and advertising.

Our Group CPO hosted a global live-stream IWD panel comprising our female Board member, and two of our Market CEO's, who shared their perspectives on inclusion, diversity and equality, and answered questions from colleagues across BAI.

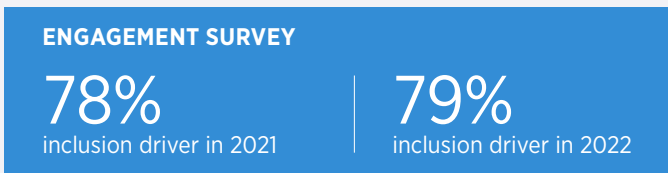
BAI CANADA

- Along with the City of Toronto and other partners, we helped connect vulnerable populations with free temporary internet access during the COVID-19 pandemic. Beneficiaries included residents in lower-income neighbourhoods, seniors in long-term care homes and clients in many City-operated shelters.

These initiatives enabled more people to connect online to social supports and vital services while still complying with directives to stay at home during the pandemic.

BAI UK

- In partnership with Transport for London BAI UK were delighted to join their Women in Engineering and Technology Programme aimed solely at females aiming to return to work. BAI UK hosted multi week work placements for a number of participants and are delighted to have appointed one participant into our Apprenticeship Programme.

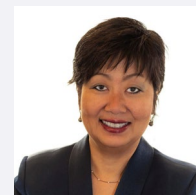


BAI AUSTRALIA

- BAI in Australia, submits wage information as per the Workplace Gender Equality Act, providing the gender pay gap. In 2015, the gender pay gap was 20% versus an improvement to 7.6% in 2021. (Gender pay gap is calculated by men's average total remuneration minus women's average total remuneration, divided by men's average total remuneration.)
- In FY22, 14 employees took parental leave with 50% of employees taking paid primary carer leave.

TRANSIT WIRELESS

- This year Transit Wireless' CEO Melinda White was named by City & State as a top 100 transportation leader. City & State's Transportation Power 100 focuses on the most important figures navigating and enabling the complex New York transportation ecosystem.
- Melinda, one of the few CEOs of colour changing the landscape in the New York telecommunications industry, is an inspiring female force for change and a strategic C-Suite leader. She has a passion for improving the way people commute and engage with public transit, while also bringing high-speed connectivity to underserved communities addressing the inequities of digital service delivery.
- Transit Wireless tracks their spend on Disadvantage Business Enterprise (DBE), including small businesses, and women and veteran-owned businesses, and spent >\$7.8M in 2021.



MOBILITIE

- In the last year, Mobilitie has renewed focus and commitment to source, interview and hire candidates that are from under represented groups within the industry. As well implemented an annual review of employee positions, responsibilities and salary ranges to ensure internal pay equity.



IN ALIGNMENT WITH SDG 10
Reduce inequality within and among countries

UNGC TEN PRINCIPLES
Human Rights principles: 1 & 2
Labour principles: 3 & 6

Taking responsible climate action for a sustainable future



OUR VISION

BAI recognises climate change is a planetary threat and to be a responsible business, we must reduce our emissions. Our vision is to be net zero scope 1 and 2 emissions by 2040, across all BAI businesses.



OUR TARGETS

Our short-term targets will support our vision, with the aim of bringing forward our net zero target, conscious of responsibly delivering ongoing profit to shareholders.



IN 2023

- Baselined (scope 1 & 2 emissions) for all new businesses
- Developed plans for scope 1 and 2 emissions reductions for all current businesses
- Establish an emissions reduction working group and provide training to members
- Run a pilot assessment of one business' scope 3 emissions.



IN 2024

- Assess all businesses scope 3 emissions
- Implemented emissions reduction plans, with an increase in efficiency and renewable energy purchased
- Run an all employee emissions reduction initiative
- Consider aligning with Science-based targets



IN 2025

- Set Scope 3 emissions reduction targets
- Run an all employee emissions reduction initiative



Mount Hopeful, Australia shot by Corrective Maintenance Manager John Giulieri



IN ALIGNMENT WITH SDG 13

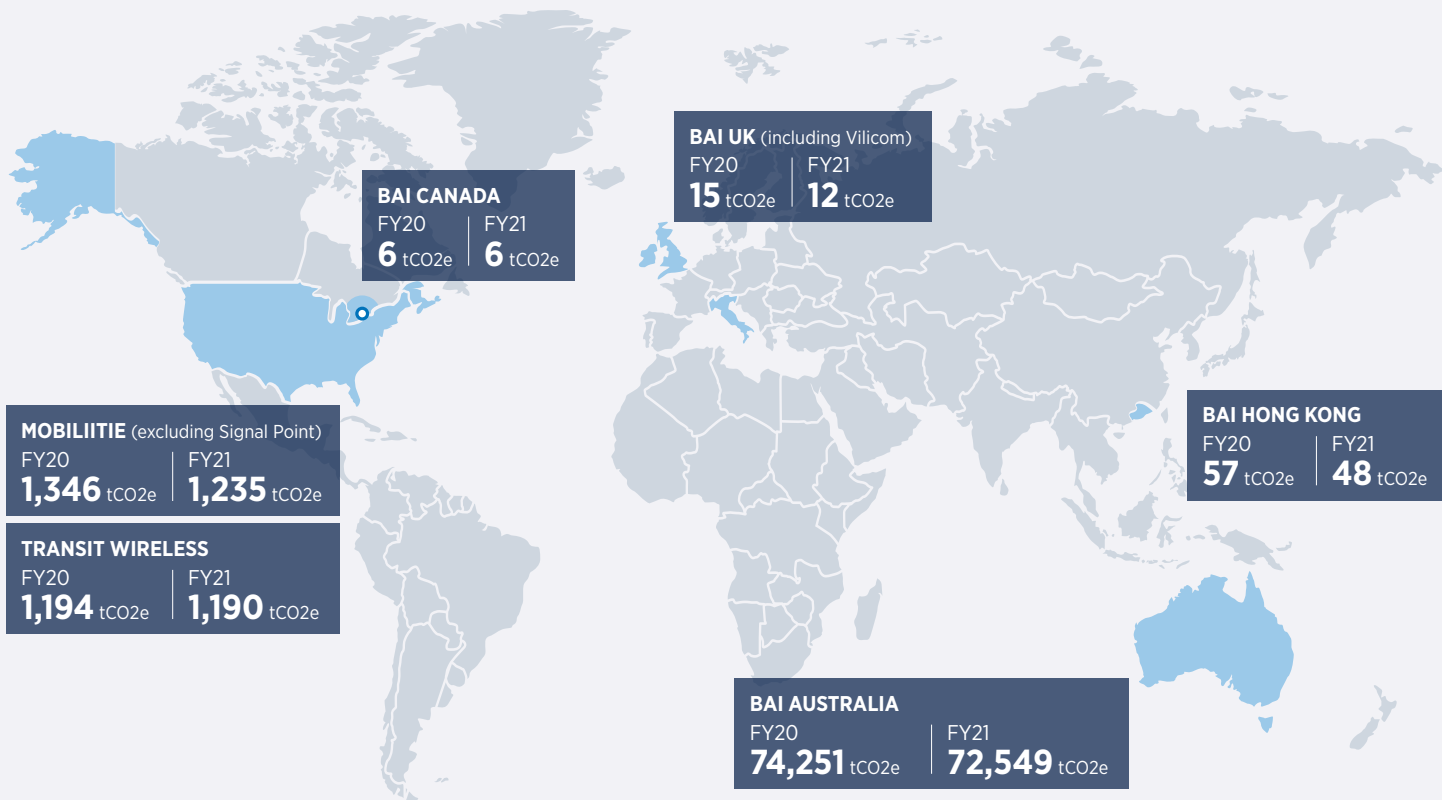
Take urgent action to combat climate change and its impact

UNGC TEN PRINCIPLES
Environment principles: 7, 8 & 9

Taking responsible climate action for a sustainable future

Current state

BAI'S SCOPE 1 & 2 EMISSIONS (TONNES OF CO2 EQUIVALENT)



BAI's new businesses, including Signal Point and BAI Italy will be baselined in 2023.

BAI engaged Aurecon Australasia Pty Ltd to conduct emissions baselining of BAI's businesses in 2021 and 2022, and BAI's reported emissions above were determined based on interviews and data shared from BAI businesses. Accuracy of data: approximately 95% of BAI's GHG emissions are associated with metered electricity consumption that has a high data accuracy (5% uncertainty). Uncertainty of total GHG emissions is +/-30%, calculated in accordance with the GHG Protocol, Short Guidance for Calculating Measurement and Estimation Uncertainty for GHG Emissions. Uncertainty is driven by the uncertainty of emission factors, where an annual average is used for an electricity grid with multiple fuel sources.



Mawson Trigg, Australia, shot by Broadcast Technician Phillip Bradbury



IN ALIGNMENT WITH SDG 13

Take urgent action to combat climate change and its impact

UNGC TEN PRINCIPLES

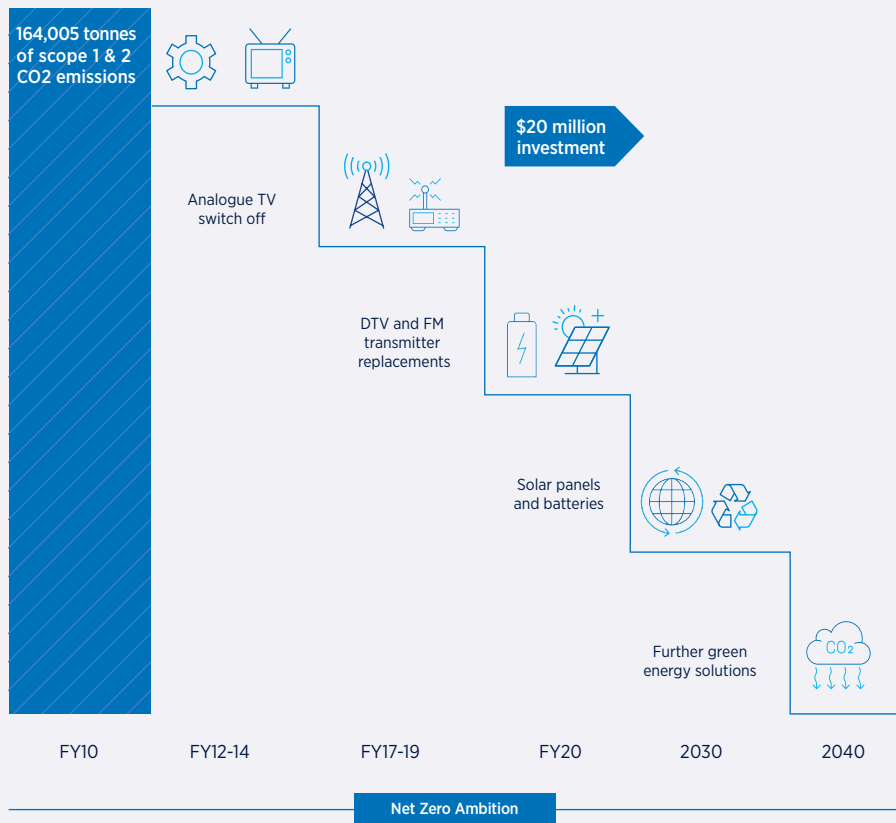
Environment principles: 7, 8 & 9

Taking responsible climate action for a sustainable future

Sharing BAI Australia's related progress

BAI's roadmap to net zero emissions:

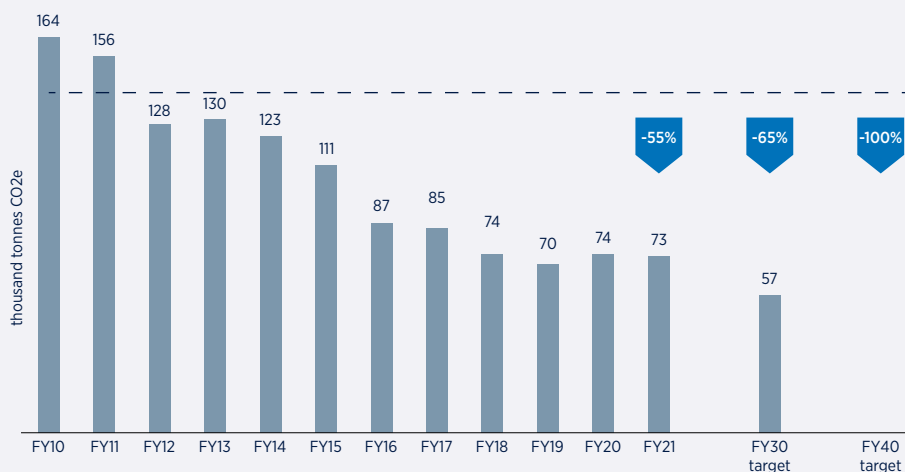
OUR TOWARDS CARBON NEUTRAL PLAN



BAI AUSTRALIA

Since baselining our Scope 1 and 2 emissions in 2010, we have taken several steps along our roadmap to net zero:

- Between 2017 and 2019, we replaced our high-power DTV transmitters with more efficient equipment at 54 sites. This reduced our emissions by approximately 9,000 tCO₂e per year.
- Between 2019 and 2020, we installed solar photovoltaics at four sites under Project Solis. In 2021, Solis generated 690 MWh of power. If we assume we would have otherwise pulled the same amount of power from the standard grid, Solis reduced our emissions by 564 tCO₂e.
- We have upgraded our HVAC systems, including free cooling, at four large usage sites. Three more sites are to be finalised by the end of 2022. These upgrades are expected to result in emissions reductions of 634 tCO₂e per year.
- In July 2022, we finalised a project at Knights Hill (in NSW) to replace an old antenna. The new antenna is double the size of the previous one, allowing us to use half the electricity to broadcast the same level of service. This is expected to reduce emissions by 395 tCO₂e per year. We also plan to roll out four similar antenna replacements over the next five years.



SCOPE 1 & 2 EMISSIONS

In 2020, 400 broadcast towers accounted for more than 98% of our global emissions. Since 2010, we have reduced our carbon emissions in Australia by about 55%.

Key drivers of reduction over time:

- Several services no longer required
- Electricity grid transition to renewable
- Investment in asset upgrades (higher efficiency)
- Installation of solar photovoltaics

Key drivers for increase in emissions:

- Management of additional services (more transmission, more back-up power and more driving to sites)



IN ALIGNMENT WITH SDG 13

Take urgent action to combat climate change and its impact

UNGC TEN PRINCIPLES

Environment principles: 7, 8 & 9

Providing resilient infrastructure and services

OUR VISION
To continue connecting communities and places into the future, through providing resilient infrastructure and services. To continue enabling high quality connectivity 24/7 for our customers.
These services are often required in times of emergency, and BAI pride ourselves on delivering and maintaining critical infrastructure for our partners.

OUR TARGETS
We have determined two key performance areas that support our vision:



Resilient infrastructure and services

We will set targets in this area in the upcoming year.



Innovation and knowledge sharing

We will set targets in this area in the upcoming year.



IN ALIGNMENT WITH SDG 9:
Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

UNGC TEN PRINCIPLES
Environment principles: 8 & 9

Providing resilient infrastructure and services

Current State



RESILIENT INFRASTRUCTURE AND SERVICES

Our success as a business depends on our ability to provide constant connectivity. In Australia alone, we provide 1,985 fully managed television and radio broadcast services on behalf of multiple networks, delivering 126 million broadcasting hours to 99% of the population.

For this reason, installing and maintaining resilient communication infrastructure is one of our fundamental operational requirements. We monitor services and conditions (including temperature and humidity) at all our sites 24/7, all year. We have 237 backup generators in Australia to guarantee the energy supply to our equipment.

Being prepared for emergencies, including seasonal weather events and cybersecurity incidents, is a key part of how we provide resilient services.

We have numerous plans detailing our proactive and reactive practices for crises, disaster recovery, emergency management, business continuity and network resilience. If a service does go down, these plans help us rise to the challenge and get services back online.



INNOVATION AND KNOWLEDGE SHARING

We have developed several methods for measuring and monitoring network performance, including Service Performance Monitoring, a non-invasive method of testing the specifications of broadcast service, and Objective Difference Grade, a method of rating audio quality out of transmission service.

In 2022, Brendan O'Reilly, Group Chief Technology Officer at BAI was invited to join the Forbes Technology Council, a community of world-class CIOs, CTOs and technology executives. Council members are chosen based on their proven ability to affect business growth metrics and on other personal achievements and honours. O'Reilly, who is also our Sustainability Executive Sponsor, was selected for the depth and diversity of his experience.

BAI and our employees are encouraged to innovate and participate in industry forums and working groups. BAI employees have over 30 memberships to industry, innovation and infrastructure related associations, and have hosted engineering podcasts.



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



IN ALIGNMENT WITH SDG 9:

Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

UNGC TEN PRINCIPLES

Environment principles: 8 & 9

Providing resilient infrastructure and services

Sharing our supporting initiatives

TRANSIT WIRELESS

- In 2019, following damage from Hurricane Sandy, the Canarsie subway tunnel in New York City was closed for rehabilitation. During that time, Transit Wireless contributed to extensive network upgrades so that, when the tunnel re-opened in September 2020, it became the city's first under-river subway tunnel to be fully outfitted for cellular voice and data connectivity. As a result, Verizon, AT&T and T-Mobile customers travelling between Manhattan and Brooklyn can now access full cellular services for the entire duration of the trip.

BAI CANADA

- BAI Canada operates the Wi-Fi, cellular and IP networks for the Toronto Transit Commission (TTC). Thanks to a partnership with RADWIN, a leading global wireless broadband solutions provider, we achieved connectivity speeds of 1.5 Gbps between TTC subway cars. RADWIN's TerraBridge Inter-Carriage Link solution is uniquely designed for railway applications, seamlessly adapting to dynamic train composition scenarios with automatic connection and disconnection between cars. The all-in-one unit also enables easy network upgrades with minimal impact and retrofit time. This partnership enables us to easily create an end-to-end gigabit network on our customers' trains and empower passengers with broadband services.

BAI AUSTRALIA

- BAI Australia continues to invest in the safety, reliability and efficiency of the broadcast network through a considered 5 year network reinvestment plan. This plan sees us investing circa \$30m per annum in asset replacements, refurbishments and upgrades. To ensure we maximise the value from this investment we keep a keen eye on both condition (through various inspection programs) and performance (through data analytics) to enable us to prioritise effectively and optimise the use of resources available. Continued investment in modern equipment is enabling an increasing ability to respond remotely, improving uptime and reducing the need for reactive site visits, keeping our staff safe and our customers impressed. Our proactive philosophy to maintenance ensures that we're always in control and enables us to manage risk effectively whilst simultaneously improving total cost of ownership outcomes over the asset life.
- In 2020, we invested in a new mast to deliver ABC Local Radio to the Townsville area, including demolition and recycling the previous 198 metres tall, 1959 built mast. The new 236-metre MF radio guyed mast is made of 155 tonnes of steel and is now the tallest structure in our network. This mast is engineered to withstand stronger cyclonic winds than the previous mast, making it more resilient against extreme weather events.



9 INDUSTRY, INNOVATION
AND INFRASTRUCTURE



IN ALIGNMENT WITH SDG 9:

Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

UNGC TEN PRINCIPLES

Environment principles: 8 & 9

Connecting communities



OUR VISION

Our vision of connected communities takes into consideration three major aspects: public safety, sustainable cities and inclusive cities that reduce the digital divide.



OUR TARGETS

We have determined three key performance areas that support our vision:



Public safety

We will set targets in this area in the upcoming year.



Sustainable cities

We will set targets in this area in the upcoming year.



Inclusive cities

We will set targets in this area in the upcoming year.



11 SUSTAINABLE CITIES AND COMMUNITIES



IN ALIGNMENT WITH SDG 11

Make cities and human settlements inclusive, safe, resilient, and sustainable

UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2
Labour principles: 6
Environment principles: 8 & 9

Connecting communities

Current state

We are already a long-term provider of emergency communication services for public safety. In the US, our services include New York City subway help-points, and we operate several critical communications networks in Hong Kong, and Toronto transit services. Our contract with Transport for London (TfL) will include the new Emergency Services Network (ESN), which will give first responders immediate, real-time access to life-saving data, images and information in unfolding situations and emergencies. Our long-term partnership with Sunderland City Council to deliver the digital foundation for building the UK's most

advanced smart city, coupled with the awarded 20-year contract with TfL to deploy a city-wide 4G-enabled and 5G-ready integrated communications network, will ensure we leave no one and nowhere behind in our efforts to connect and digitalize public services, while improving communities and environment we all depend on. We're also helping the City Council bring substantial social and economic benefits to its residents, businesses, and visitors, including the creation of more than 100 jobs.



PUBLIC SAFETY

We provide vital communication infrastructure that enables emergency service networks around the world to keep their communities safe, connected and informed.

In Australia, we manage national television and radio infrastructure, supporting key communication platforms for public updates during emergencies. In New South Wales, we also support the Public Safety Network.

In the US, our services include New York City subway help-points, and we operate several critical communications networks in Hong Kong, Toronto (Canada), London and Sunderland (UK).

Our contract with Transport for London to provide a neutral host mobile network will also include the new Emergency Services Network (ESN), which will give first responders immediate, real-time access to life-saving data, images and information in unfolding situations and emergencies.



SUSTAINABLE CITIES

Governments and organisations are planning for increased congestion in cities, as well as for how to keep people safe during extreme weather events, pollution, pandemics and civil unrest.

Smart cities will play a key role in managing these situations, and we are already providing increased connectivity throughout the London Underground, in Sunderland and across the US



INCLUSIVE CITIES

Free public Wi-Fi enables those without endless data plans to access the internet to learn, make connections and create opportunities.

We are providing fundamental communications infrastructure as part of the Sunderland City Council's smart city plan to leave no one behind.



IN ALIGNMENT WITH SDG 11

Make cities and human settlements inclusive, safe, resilient, and sustainable

UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2

Labour principles: 6

Environment principles: 8 & 9

Connecting communities

Sharing our supporting initiatives

BAI UK

- In 2021, Sunderland City Council awarded a 20-year strategic partnership to BAI UK to design, build and operate next-generation digital infrastructure, including a private 5G small cell network. The project is the next step on Sunderland City Council's journey toward its global smart city ambition, having been named the UK Smart City of the Year 2020 and Connected Britain Digital Council of the Year 2021. Through the first phase of the partnership, we built a backbone of 5G connectivity, based on a neutral host model. The new high-speed 5G coverage provides a platform for business growth and innovation, helping the Council bring substantial social and economic benefits to its residents, businesses and visitors, including the creation of more than 100 jobs.

BAI HONG KONG

- Our 20-year partnership with the Mass Transit Railway (MTR) delivers ongoing value through essential radio system upgrades, mobile phone system installations and critical sub-system updates to the network. Specifically, we have built indoor radio networks in airport terminals, convention centres and major shopping complexes across the country and are currently exploring a pioneer 5G distributed antenna system in a transit environment. Through this work, we digitally enable 2 billion underground passenger rides every year across the 218-kilometre metropolitan network, which is one of the world's busiest rapid transit railway systems. We also work closely with the Hong Kong government on communications projects including upgrading fire services radio systems, police radio systems and re-broadcasting systems in car tunnels, as well as the integrated cellular network in the central government office complex.

BAI AUSTRALIA

- We operate and maintain the New South Wales Public Safety Network (PSN), a critical platform for government agencies, including public safety, law enforcement and essential services, on behalf of the NSW Telco Authority (NSWTA). At the core of the NSWTA's service delivery is meeting the day-to-day and mission-critical operational communications needs of emergency services organisations (ESOs), government agencies and essential services. Covering approximately 325,000 square kilometres, the PSN is one of the world's largest government radio networks and is key to the NSWTA's mission, providing critical support and protection for frontline personnel and the NSW community during emergency situations and crises.
- Our successful track record of working with NSWTA and the communications industry to respond to needs, solve problems and drive innovation was particularly visible throughout the Black Summer bushfires of 2019-2020. During this relentless period, our teams defended, reinforced and repaired communications networks to ensure the continuity of the primary NSW emergency services communications network. Under our new contract, we will implement a new service delivery model, which will include proven tools and processes to elevate the performance standards needed for the delivery of reliable and resilient services now and into the future.



11 SUSTAINABLE CITIES AND COMMUNITIES



IN ALIGNMENT WITH SDG 11

Make cities and human settlements inclusive, safe, resilient, and sustainable

UNGC TEN PRINCIPLES

Human Rights principles: 1 & 2
Labour principles: 6
Environment principles: 8 & 9

ESG Governance

Summary

As outlined in this report, as part of our commitment to the UN Global Compact, we have publicly shared our agreed targets for three priority SDGs, as well as outlined our progress more broadly against our five priority SDGs and the Ten Principles.

We have strong leadership commitment to advance our ESG targets and currently provide regular updates to employees, our executive leadership team and our Board of Directors.

Our Group Risk and Compliance Team reviews our risks every six months, manages them according to our Risk Management Framework and reports regularly to the Audit and Risk Committee and the Board.

Once a year, we take part in the GRESB ESG benchmarking initiative, a practice that has complemented the development of our approach to sustainability. Key sustainability personnel attend UNGC-hosted and other ESG forums, and we provide ongoing sustainability training to support continued improvement.

In FY2022, we underwent a governance and compliance review with an external consultant on behalf of our shareholders (Canada Pension Plan Investment Board). The results were presented to the executive leadership team and the Board.

Governance Framework

Our safety, wellbeing and sustainability (SWS) commitments and standards are detailed in our BAI Group SWS Framework. Although the Group CEO and CFO are responsible for the overall SWS Framework, each business CEO signs onto the framework and is responsible for their business meeting the requirements.

Our Group Risk and Compliance Team conducts compliance audits across BAI businesses, as well as review and update risks. Updates are provided to the Audit and Risk Committee quarterly.

METRICS AND REPORTING

As outlined in this report, we have publicly shared our sustainability/ESG targets (metrics) and will be reporting progress in our second report in 2023. Internally, we monitor progress on these metrics (along with numerous additional SWS metrics) within our monthly SWS reporting:

- Each business submits progress reports each month.
- The group SWS Manager compiles the reports.
- The group CRO and CFO review and approve.
- The report is delivered to the Group CEO, the executive leadership team and SWS leaders.
- The leadership team updates all employees through livestream updates, our internal newsletter and our intranet.

How do we do this

Key drivers:

- UN Global Compact annual Communication on Progress (this report)
- Executive Leadership Scorecards gateways, which include 'SG' components (currently safety, compliance and reputation)
- Our SWS Framework signed by all Executives
- Our SWS monthly CEO Board reports
- BAI Group SWS Committee meetings (currently two per year)
- Risk workshops
- Compliance reviews and internal audits
- ISO 45001, 14001, 9001 and 27001 certifications
- Additional external audits (Federal Safety Commission, Transit Authorities; Transport for London, Metropolitan Transit Authority, Mass Transit Railway and others)
- Annual employee engagement survey
- Health and safety due diligence alerts every six months from our legal firm partner
- Keeping up to date with industry best practices through forums, Risk Leadership Network, H&S and Diversity council memberships, and various subscriptions
- ESG benchmarking (GRESB)

2023 enhancements:

- ESG governance reporting, processes, and responsibility mapping



BAI's key ESG milestones

Taking the next steps on an ambitious journey

We all have a responsibility to create the future we want for ourselves and for the generations that will follow us.

Through our commitments outlined in this report and those to come in subsequent years, we at BAI are doing our part to support human rights by providing decent work and pursuing responsible economic growth. We're building resilient and innovative infrastructure to enable industry and make communities safer and more equitable through digital connectivity. We're working hard to reduce inequality within our own company, and we're committed in our net zero scope 1 & 2 emissions by 2040 target, focusing on developing reduction plans across each business.

We're proud to share our progress towards these goals, and we pledge to continue to be ambitious, always pushing ourselves to be better and to help build a better world for all.

AT THE BEGINNING

BAI business carried out small ESG initiatives

AUGUST 2020

Baselined scope 1 and 2 emissions for BAI Australia

SEPTEMBER 2021

Baselined scope 1 & 2 emissions across BAI Group, TW, HK, Canada & UK 2021 GRESB: BAI ESG benchmark 84

NOVEMBER 2021

Sustainability Essentials short course, Cambridge Institute for Sustainability Leadership, offered to 10 sustainability champions across the business

AUGUST 2022

>97% employees have completed Modern Slavery training

2018 - 2020

BAI ESG infrastructure benchmark 62, 72, and 78 by GRESB

AUGUST 2021

Materiality assessment determined our five priority commitments as aligned with SDGs

OCTOBER 2021

BAI joined the UN Global Compact

FEBRUARY 2022

2025 Targets agreed for 3 out of 5 SDG's

OCTOBER 2022

We published our first Sustainability Report

Appendix A: Our 2021 materiality assessment

The United Nation's sustainable development goals

The UNGC is underpinned by 17 Sustainable Development Goals (SDGs), which define the world we want and lay out the actions we need to take collectively to get there. As a signatory to the UNGC, we are committed to supporting these goals and to focusing specifically on those most relevant to our organisation.

In 2021, we undertook a materiality assessment to determine our priority SDGs. Based on that assessment, we determined that our core business deliverables most strongly align with SDGs 8, 9 and 11. We are also making progress in key areas aligned with SDGs 10 and 13.

Each SDG has global targets for all governments to aspire to. The UN Global Compact asks companies to first do business responsibly and then pursue opportunities to solve societal challenges through business innovation and collaboration. We have mapped our own progress against the global targets for our selected SDGs, and have set company-wide targets against SDGs 8, 10 and 13.

In the coming year, we will set targets for SDGs 9 and 11, utilising BAI's strengths in these areas.

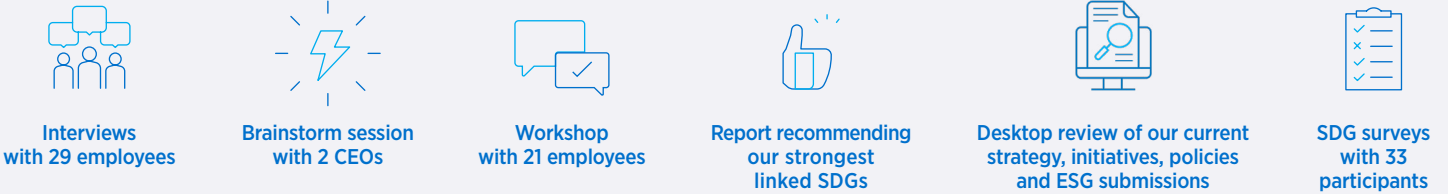
See Appendix A for more on our materiality assessment.



Appendix A: Our 2021 materiality assessment continued

We engaged consultants from Aurecon to undertake an external materiality assessment to determine the SDGs most material to our operations and aspirations. The assessment will be reviewed and updated in 2025.

APPROACH



OUR ASPIRATIONS

Our aspirations were applicable to many of the SDGs, as shown in the table below. However, leaders agreed to not take on too many actions across too many SDGs in the beginning, as we aim to build a strong foundation to then implement into our 2025 strategy.

BAI's Aspirations	UN SDG's																
	1 NO POVERTY	2 ZERO HUNGER	3 GOOD HEALTH AND WELL-BEING	4 QUALITY EDUCATION	5 GENDER EQUALITY	6 CLEAN WATER AND SANITATION	7 AFFORDABLE AND CLEAN ENERGY	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	10 REDUCED INEQUALITIES	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION	14 LIFE BELOW WATER	15 LIFE ON LAND	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	17 PARTNERSHIPS FOR THE GOALS
Provide Services to underserved								✓	✓	✓	✓						✓
Promote wellbeing at home & work			✓					✓									
Drive for gender equality at all levels					✓			✓		✓							✓
Diversity & inclusion celebrated					✓			✓		✓	✓						
Carbon neutral assets							✓						✓				
Energy efficient assets							✓	✓					✓				
Minimise materials used & waste								✓	✓		✓	✓					
Be an integrator for smart cities								✓	✓		✓						
Eradicate modern slavery risks					✓			✓		✓						✓	✓
Assets resilient to Climate Change									✓		✓		✓				
Partnerships drive greater outcomes								✓	✓		✓						✓

DETERMINING OUR PRIORITY SDGS

Further analysis of our values and their alignment with SDGs was carried out via:

- An executive survey asking leaders to nominate the five SDGs they believe to be most material to BAI
- Workshops, during which participants were asked to vote for the two or three SDGs they believe we should focus on over the next three years
- Market comparisons, which reiterated the alignment of relatable SDGs with our customers and similar communication infrastructure providers

We were determined to build strong foundations around a small number of SDGs but couldn't stick to only three. In the end, we selected five priority SDGs.

Appendix A: Our 2021 materiality assessment continued

PRIORITY SUSTAINABILITY GOALS



Appendix B:

SDG target mapping

The following table shows the UN targets under each SDG that are most relevant to BAI and that we are actively working towards.

BAI's priority SDG's	Related UN SDG targets
 <p>8 DECENT WORK AND ECONOMIC GROWTH</p>	<p>8.2 Achieve higher levels of economic productivity through diversification, technological upgrading and innovation</p>
	<p>8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value</p>
	<p>8.8 Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment</p>
 <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>	<p>9.1 Develop quality, reliable, sustainable, and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human wellbeing, with a focus on affordable and equitable access for all</p>
	<p>9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities</p>
	<p>9.5 Enhance scientific research, upgrade the technological capabilities of industrial sectors in all countries, in particular developing countries, including, by 2030, encouraging innovation and substantially increasing the number of research and development workers per 1m people, and public and private research and development spending</p>
 <p>11 SUSTAINABLE CITIES AND COMMUNITIES</p>	<p>9.C Significantly increase access to information and communications technology and strive to provide universal and affordable access to the Internet in least developed countries by 2020</p>
	<p>11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons</p>
	<p>11.4 Strengthen efforts to protect and safeguard the world's cultural and natural heritage</p>
 <p>10 REDUCED INEQUALITIES</p>	<p>11.7 By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities</p>
	<p>10.2 By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion, economic or other status</p>
	<p>10.3 Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices, and promoting appropriate legislation, policies and action in this regard</p>
 <p>13 CLIMATE ACTION</p>	<p>10.4 Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality</p>
	<p>13.1 Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries</p>
	<p>13.2 Integrate climate change measures into national policies, strategies and planning</p>
	<p>13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning</p>

Appendix C:

Our detailed actions supporting the ten principles

How we're aligning with the TEN principles

The UNGC calls for a principles-based approach to doing business, operating in ways that meet or exceed fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. As a responsible business, we acknowledge that good practices in one area do not offset harm in another. BAI commits to operate responsibly, in alignment with universal sustainability principles (the Ten Principles).

PLEASE SEE THE FOLLOWING PAGES FOR MORE INFORMATION ON HOW WE ARE ALIGNING WITH THE UNGC TEN PRINCIPLES

Description	UNGC Principles	What we're doing
Human Rights	<ol style="list-style-type: none"> 1. Businesses should support and respect the protection of internationally proclaimed human rights. 2. Businesses should make sure that they are not complicit in human rights abuses. <p>BAI respects the rights of indigenous peoples around the world and pays ours respect to First Nations Elders past, present, and emerging.</p>	<ul style="list-style-type: none"> • Safeguarding against modern slavery in our supply chains • Treating our employees fairly and promoting good working relationships • Establishing formal whistle-blower and grievance policies • In Australia, BAI is a major partner of Bangarra Dance Theatre, a company of professional Aboriginal and Torres Strait Islander performers with the mission to promote awareness and understanding of First Nation's cultures
Labour	<ol style="list-style-type: none"> 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining. 4. Businesses should uphold the elimination of all forms of forced and compulsory labour. 5. Businesses should uphold the effective abolition of child labour. 6. Businesses should uphold the elimination of discrimination in respect of employment and occupation. 	<ul style="list-style-type: none"> • Enforcing a supply chain compliance program • Upholding a Code of Conduct for all employees • Issuing a Modern Slavery Statement every year setting out our actions against modern slavery
Environment	<ol style="list-style-type: none"> 7. Businesses should support a precautionary approach to environmental challenges. 8. Businesses should undertake initiatives to promote greater environmental responsibility. 9. Businesses should encourage the development and diffusion of environmentally friendly technologies. 	<ul style="list-style-type: none"> • Certifying to ISO 14001 in Australia and the UK • Investing in renewable energy and energy efficiency projects • Improving our awareness and management of high biodiversity-value sites • Supporting a wide range of environmental initiatives
Anti-corruption	<ol style="list-style-type: none"> 10. Businesses should work against corruption in all its forms, including extortion and bribery. 	<ul style="list-style-type: none"> • Enforcing policies on anti-bribery, anti-corruption and anti-money laundering; government relations; and political contributions • Carrying out due diligence and risk assessment for customers and suppliers • Running whistleblower training biannually for all employees

PLEASE SEE APPENDIX A FOR OUR DETAILED ALIGNMENT WITH THE TEN PRINCIPLES.

Appendix C:

Our detailed actions supporting the ten principles continued

The following table presents the progress we've made to date toward supporting the UNGC's Ten Principles.

Principles	Current Progress
Human Rights	
1. Businesses should support and respect the protection of internationally proclaimed human rights.	We respect and support human rights. We are committed to acting ethically and with integrity and transparency in all business dealings. We are also committed to putting appropriate and effective systems and controls in place to reasonably safeguard against modern slavery occurring within our business or supply chains.
2. Businesses should make sure that they are not complicit in human rights abuses.	<p>We are working to identify and address these practices if they occur through due diligence and risk management processes and by maintaining a culture that encourages people to speak up when something is not right (see labour principles, below, and our SDG 8 progress and targets, page 9).</p> <p>We strive to provide an environment where employees and others in the workplace are treated fairly and with respect, and are free from unlawful discrimination, harassment, vilification and bullying. We aim to make all employment decisions based on merit, not on irrelevant attributes or characteristics.</p> <p>BAI respects the rights of indigenous peoples around the world and pays our respect to First Nations Elders past, present, and emerging. In Australia, BAI is a major partner of Bangarra Dance Theatre, a company of professional Aboriginal and Torres Strait Islander performers with the mission to promote awareness and understanding of First Nation's cultures.</p> <p>We also try to create a work environment that promotes good working relationships, as outlined in our anti-discrimination and equal employment opportunity policy.</p> <p>We have also established formal whistleblower and grievance policies.</p>
Labour	
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	We are committed to acting ethically and with integrity and transparency in all business dealings. We are also committed to putting appropriate and effective systems and controls in place to reasonably safeguard against modern slavery occurring within our business or supply chains. We are working to identify and address these practices if they occur through due diligence and risk management processes and by maintaining a culture that encourages people to speak up when something is not right.
4. Businesses should uphold the elimination of all forms of forced and compulsory labour.	To ensure organisations involved in our supply chain and operations comply with our values regarding modern slavery, we have a supply chain compliance program in place. All suppliers are pre-qualified prior to appointment and submission of purchase orders. Our compliance program consists of:
5. Businesses should uphold the effective abolition of child labour.	<ul style="list-style-type: none"> • Using internal resources as appropriate before going to market for external suppliers • Adhering to our procurement processes to ensure suppliers are adequately vetted (i.e., through the completion of Supplier ISO Accreditation and Management Systems) • Conducting supply chain mapping and risk analysis appropriate for the supplier and when required by local laws • Requiring our key suppliers to comply with our Code of Conduct and, where modern slavery laws are applicable for suppliers considered high risk, to provide a copy of their Modern Slavery Statement published under their relevant jurisdictional legislation; if the above is not available, requiring suppliers to complete a Modern Slavery Declaration
6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.	

Appendix C:

Our detailed actions supporting the ten principles continued

Principles

Current Progress

Labour continued

- Our Code of Conduct outlines our commitment to responsible business practices and sets out our expectations for how our employees, contractors and suppliers should act. We issue a Modern Slavery Statement every year, made by the BAI Communications Group holding company Frequency Infrastructure Australia Holdings Pty Ltd, under the Australian Modern Slavery Act 2018 (Cth) on behalf of each of the Group companies covered by this Statement and BAI Communications Limited under the UK's Modern Slavery Act 2015. The Modern Slavery Statement sets out the steps our companies have taken and are continuing to take to ensure modern slavery is not occurring within our operations or supply chains.
- During the past 12 months, we did not identify any instances of modern slavery occurring in our operations or supply chains. To ensure compliance:
- Our Risk and Compliance team completes internal audits (modern slavery is included in every internal audit scope and reviewed where applicable).
- Modern slavery is discussed during periodic risk workshops with relevant business and support functions such as procurement, supply chain, legal and HR.
- Our Group HR function ensures all our employees are paid at or above minimum wage levels in each of the countries in which we operate.
- We maintain appropriate communication with the next link in the supply chain for goods and services in our business to ensure their understanding of and compliance with modern slavery legal obligations.
- Relevant employees complete training modules.

See page 9 for our targets and progress related to modern slavery.

Environment

7. Businesses should support a precautionary approach to environmental challenges.
8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.

Our environmental policy supports our efforts to minimise our impact on the environment. We are ISO 14001: 2015 certified in Australia and the UK and are developing responsible reduction plans for each business.

We are focused on responsible emission reduction and recently committed AUD20 million over the next five years for renewable energy and energy efficiency projects in Australia. We own and/or manage many sites in Australia and have an ongoing program to improve our awareness and controls in high biodiversity-value sites.

Supporting environmental initiatives include:

- Battery recycling: in 2021, the BAI Canada team collected and shipped 102 APC batteries for recycling, diverting 5,000 lbs from the landfill. In 2022, 10,000 lbs have been diverted to date.
- Responsible asbestos management
- Increased accuracy of supply orders to reduce waste
- Office improvements:
 - Recycling bins
 - Coffee pod recycling
 - Reduction of single-use plastics
 - Recycled paper for printers
- Employee participation in:
 - Tree planting
 - Beach clean-ups
 - Carbon footprint baselining

As we undergo periodic technology refreshes, we will continue to explore avenues to responsibly recycle, repurpose or reuse equipment where possible.

See page 15 for our emission related targets. and move to directly after the climate sentence i.e. energy efficiency projects in Australia.

Appendix C:

Our detailed actions supporting the ten principles continued

Principles

Current Progress

Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

We have zero tolerance for bribery and corruption, and individuals and companies that engage in bribery and corrupt behaviour are subject to significant penalties. Our Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy sets out clearly our position on bribery, money laundering, terrorism financing and other corrupt behaviour; compliance with all applicable laws and regulations; and the responsibilities of our officers, directors, employees, consultants and contractors. We perform customer and supplier due diligence, including risk assessment (medium to high level of risk results trigger consideration of additional due diligence).

All gifts (including discounts and hospitality) valued at \$150 (AUD or equivalent) or greater provided to or received from external parties must be declared in the biannual BAI Communications Gift Declaration (monitored by Internal Audit and approved by the Group CFO).

Our government relations policy outlines responsible engagement with government officials and policymakers. We always abide by applicable legislation regarding political engagement in all jurisdictions in which we operate, as well as by any restrictions on political engagement required under any procurement process in which we take part. We communicate appropriately with public stakeholders and government officials.

Our political contributions policy clearly sets out our position on political contributions and compliance with all applicable laws and reporting requirements in Australia and internationally. The policy also outlines the responsibilities of our officers, directors, employees, consultants and contractors in observing and upholding our position on political contributions.

Our code of conduct policy defines the standards and behaviours we expect from employees and that underpin our culture and values. The policy is supported by mandatory training that includes modules on data protection, online corporate induction and modern slavery.

We recognise the value and importance of employees reporting identified or suspected instances of bribery, corrupt practices, money laundering or terrorism financing, and we strongly support such disclosures and reports through our whistleblowing policy. All employee whistleblower training is run every two years.

In FY2022, we underwent a governance and compliance review with an external consultant on behalf of our shareholders, and the results were presented to the executive leadership team and the Board.



United Nations
Global Compact

The UN Global Compact Network Australia is mobilising Australia's leading businesses to create a sustainable future and find opportunities to impact our world – for good.

BAI Communications has joined the UN Global Compact – the world's largest corporate sustainability initiative. We recognise that this collaboration is crucial to our approach, as we work closely with our customers in telecommunications, government, transit, enterprise, broadcasting, and venues and focus not just on the immediate future, but on the possibilities that exist over 5, 10, and 20-year horizons.



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