



# ASI

SOLUTIONS

**Anabelle Bits Pty Ltd**  
**T/A ASI Solutions**  
ABN 40 068 649 972  
FY 2022-2023  
Revised: 30 March 2023

# ASI's Modern Slavery Statement

## 1. Managing Director commentary

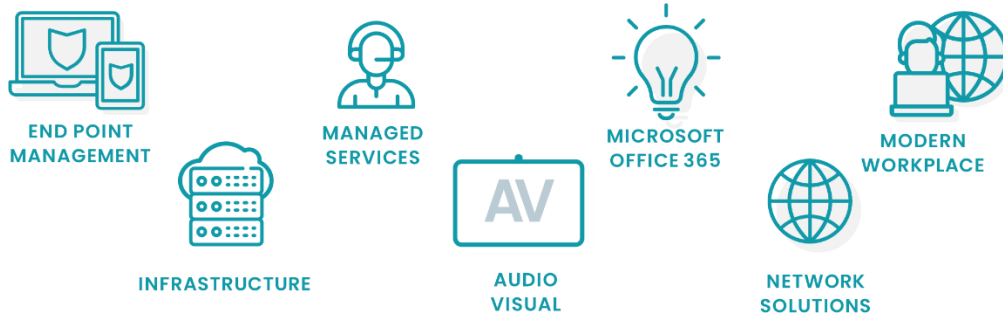
ASI Solutions Modern Slavery Statement demonstrates our ongoing commitment to our improvement of our modern slavery action planning to address and diminish modern slavery risks in our business. We continue to drive improvements on identifying and addressing modern slavery risks.

This statement sets out the actions that ASI Solutions have performed to demonstrate our company's commitment to upholding fundamental human rights and freedoms. ASI will not tolerate modern slavery in any of its forms within its supply chain or in any part of its business and will not knowingly engage in or partner with external entities that engage in modern slavery.

Our policies and procedures in relation to Procurement, People & Culture and Corporate Responsibility will continue to underpin this commitment and enable us to be compliant with all applicable legislation, including the Australian Modern Slavery Act of 2018, and the UN Guiding Principles on Business and Human Rights.

## 2. ASI Businesses

Anabelle Bits Pty Ltd t/as ASI Solutions (ABN 40 068 649 972) has been a provider of innovative and pioneering technology solutions to Australian private and public sector organisations for over 35 years. We specialise in all areas of IT from hardware and software procurement to complete managed services.



ASI Solutions is comprised of the following Entities:

Fully integrated under ASI Solutions:

- **BEarena Pty Ltd** (ABN 53 125 400 062) a provider of IT Services to customers in Australia,
- **ASI Solutions Limited** (NZBN 9429030015302) a provider of IT Services to customers in Auckland/Wellington, NZ, and
- **Forward IT** (Forward IT Pty Ltd, ABN: 42 597 085 374), who also provide IT Services to customers in Canberra, ACT.

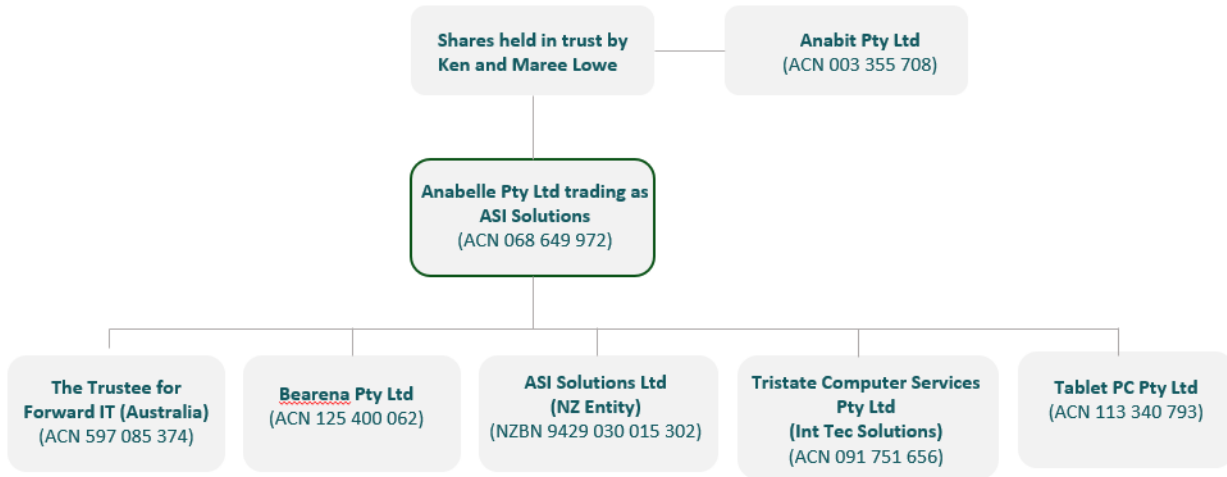
Acquired and operating as a separate entity:

- **Int Tec Solutions** (Tristate Computer Services Pty Ltd, ABN: 72 091 751 656), also providing IT services to customers based in Mildura, VIC, and
- **Tablet PC** (Tablet PC Pty Ltd As Trustee for The MIT Investments Trust, ABN 22 314 713 182), a provider specialising in Microsoft Solutions training for customers in Australia.

This is a joint modern slavery statement prepared by ASI Solutions as the Reporting Entity on behalf of BEarena, ASI Solutions Limited, Forward IT, Int Tec Solutions, and Tablet PC as wholly controlled entities under ASI.

For this statement, the terms "ASI Solutions" and "ASI" shall refer to Anabelle Bits Pty Ltd and its group of companies including all entities listed above.

# CORPORATE STRUCTURE



### 3. Policies and Protocols

A major factor in our modern slavery strategy is our corporate governance and management oversight and evident by our policies and practices which our people are required to comply. These policies and protocols help embed our anti-slavery in our company and ensure we carry our responsibilities to mitigate modern slavery in a consistent manner across our operations and supply chain.

Policy	Date of Revision
Code of Conduct	July 2022
Discrimination, Harassment & Bullying Policy	July 2022
Grievance & Complaints Handling Policy	November 2022

We have recently conducted a full review and undertaken update of all ASI policies.

### 4. ASI’s Commitment

As a family-owned business, ASI prides itself on the reputation it has built within the IT Industry for over three decades. With core values that reflect family, integrity, and honesty, we support an open and inclusive workplace, where people can speak up freely and with confidence, disclose information in a confidential manner and feel supported without fear of recrimination.

We believe that our customers as well as our people, should be treated with respect and dignity, and we expect our staff to behave ethically and responsibly in accordance with our company policies and to cultivate appropriate business behaviour across the organisation.

This Modern Slavery Statement outlines the steps we are taking to reflect a commitment to acting ethically and with integrity in all our business dealings and implementing measures to ensure that slavery and human trafficking does not occur in our internal processes and supply chain, as well as expect our suppliers to uphold high ethical standards including not engaging either directly or indirectly in illegal labour practices, or otherwise having some form of Modern Slavery present in their supply chain.

### 5. Consultation Process

ASI’s second Modern Slavery Statement was crafted in consultation with key management personnel across all entities under the ASI Solutions Group. This process also involved engaging senior leadership representing stakeholders from Procurement, People & Culture, as well as the ASI Executive Team.

## Operational Guidelines

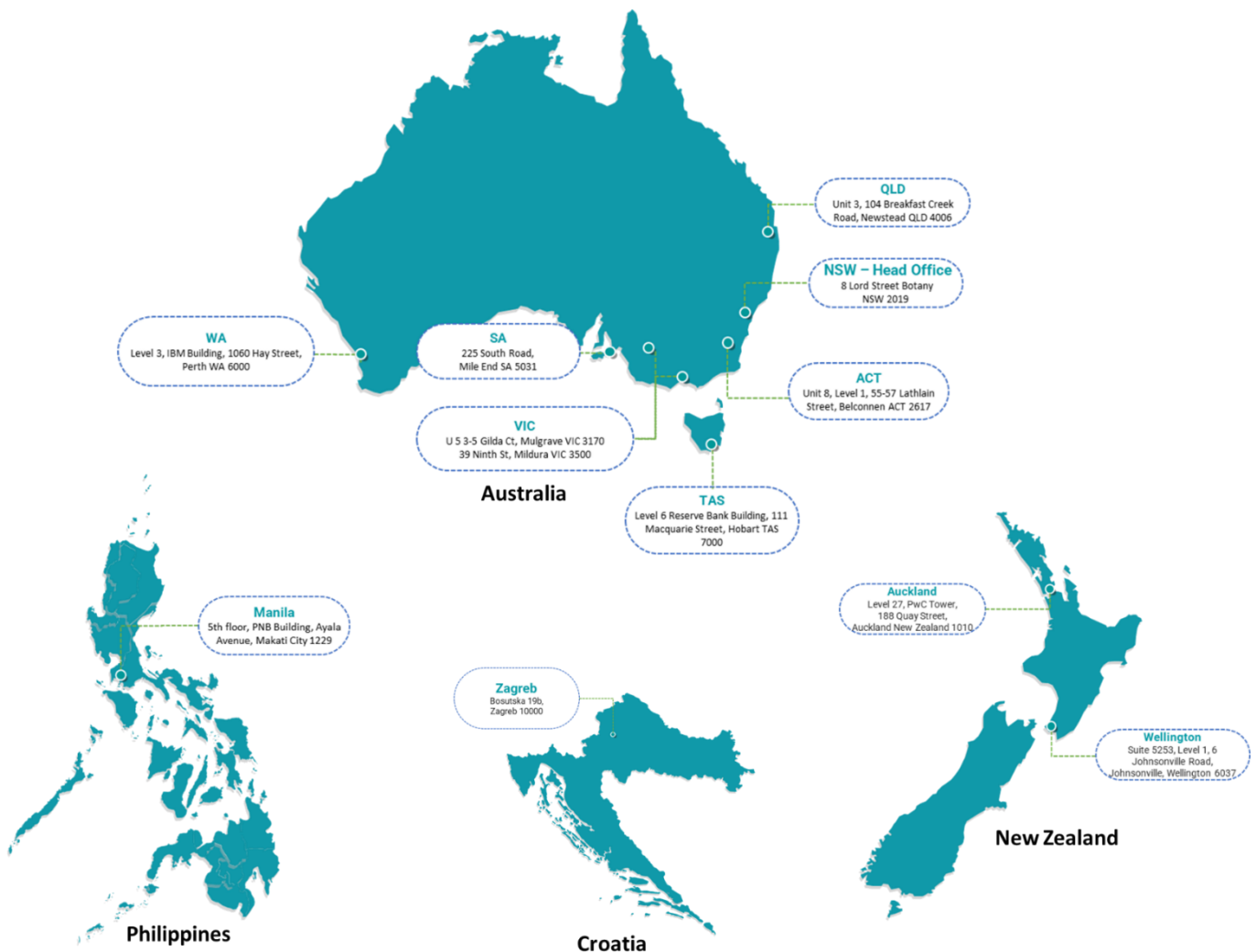
The following guidelines apply to all persons and entities affiliated with ASI Solutions in any capacity, including all employees, Directors, agency workers, contractors, consultants, as well as suppliers and any other third-party representatives,

- Ensure all work is freely chosen.
- Ensuring the prevention of illegal child labour
- Ensuring fair and equitable remuneration
- Ensuring compliance with all laws relating to wages, superannuation, and benefits
- Ensure workers right to freedom of association, collective bargaining, peaceful assembly and the freedom of thought, religion opinion and expression.
- Ensuring and identification and addressing of modern slavery practices and the risk of modern slavery within our operations and supply chains.

### 6. ASI Locations

ASI has an average of 175 staff across all business operations across Australia, New Zealand, Croatia and the Philippines. ASI offices are based across Australia and New Zealand, as well as in the Philippines and Croatia are indicated below.

ASI warehouses are located at the Head Office in Sydney with secondary storage spaces within each of the state branch offices.



ASI has outsourced operations based in Zagreb, Croatia, as well as in Manila, Philippines via Business Processing Operators (BPOs). There are 7 staff in Croatia composing our Systems Monitoring Team under our Services Department, while 13 staff members in Manila perform roles within the ASI Services, Operations, and HR Departments.

## 7. ASI's Supply Chain

ASI Solutions regularly purchases goods and services that are required for its business operations. We work with around 30 suppliers in Australia, some of which are from the United Kingdom, China and Germany which provide us with IT Hardware and AV Equipment. These suppliers are engaged on a long-term basis, with most relationships spanning between 5 to 25+ years. Our top suppliers shown below.



Our Key Product and Capability Offerings are the following:

- Hardware and Software Procurement
- Managed IT Service & 'As a Service' Models
- Professional Services
- Consultancy & Design.

Our customers are Australia and New Zealand private and public sector entities spanning the following industry sectors:

- Education (33%)
- Corporate / Enterprise (32%),
- Government and Health (26%), and
- Other Industry Sectors (9%).

## 8. Our People Processes

Internally, our People & Culture Team ensure all business unit continually self-monitor to minimise the risk of modern slavery practices occurring within our own business operations. Heads of Department consult with the People & Culture team and as necessary, provide updates on their respective anti-modern slavery efforts to the Executive Team during Executive Meetings. ASI's internal company policies are reviewed and updated regularly to reflect efforts being taken toward responsible supply chain and business operations management.

Equally, through best practice HR Operations, ASI ensures fair treatment of its direct employees as well as our outsourced staff by providing a workplace that is safe, inclusive, and diverse and promoting a work atmosphere where its people feel supported and respected, regardless of ethnic origin or background.

This is reflected across our People Practices, from recruitment and onboarding through ongoing employment as well as processes around rewards and remuneration.

## 9. Risk Management and Continuous Conformance

ASI will not do business with an external entity, either a vendor, supplier, or customer with the knowledge that some form of modern slavery exists within their supply chain.

New and existing suppliers will be required to disclose information regarding their employment practices and provide transparency around their actions towards eliminating the risk of modern slavery by way of a Supplier Self-Audit ([Supplier Self-assessment Questionnaire - Annexure A](#)).

We will manage modern slavery risks using a four-step methodology:

1. Risk Assessment: Identify risks of modern slavery within our supply chain and our secondary suppliers according to the following factors:

Category	Risk Factor
Geographical Location	Business operations or raw materials originating from <ul style="list-style-type: none"> <li>• countries that are afflicted by war or conflict.</li> <li>• countries with a high incidence of corruption and weak regulation around labour standards</li> </ul>
Vulnerable Populations	Employing the following worker categories: <ul style="list-style-type: none"> <li>• migrant workers (individuals working across borders who have temporary or unofficial citizenship in their current location)</li> <li>• base skill workers</li> </ul>
Supplier Business Models	Employing third-party labour hire companies resulting to diminished visibility and control over recruitment procedures
Reputational Risk	If penalties or sanctions regarding modern slavery risk have been previously meted out to them.

A supplier will be deemed as substantial risk if they fall into any one of the risk factors mentioned above.

2. Due Diligence: Suppliers that are deemed as high risk will be asked to provide more comprehensive information on their operations and supply chain for us to understand whether they adhere to ASI policies as well as current relevant legislation against modern slavery.
3. Action Planning: Take the necessary steps to address and/or any potential risks uncovered. These steps may involve further checks on the supplier's legitimacy, level of compliance ability to manage labour rights.
4. Evaluation: Measure the effectiveness of the actions taken.

## 10. Non-Conformance

Any breach of this policy will be taken seriously and will be dealt with in accordance with ASI's grievance and disciplinary policy.

As for the ASI supplier network, the Directors have adopted a zero-tolerance stance towards the supplier's behaviour and explore options of preventing further engagement with the supplier or may decide to work with the supplier towards compliance with this policy.

## 11. Reporting Concerns

If an ASI staff member becomes aware of or suspects behaviour that constitutes modern slavery in connection with our business operations or supply chain, they are encouraged to report it immediately to a director or to a member of the People & Culture Team. All matters will be investigated and dealt with in accordance with the ASI Grievance policy.

## Measuring Success

From the last reporting period, ASI has accomplished the following from the targets we set in our first Modern Slavery Statement:

- **Internal Policy Review**
  - Performed a review on internal policies ensuring current and compliant with local and federal regulations, and in connection with modern slavery guidelines.
- **Procurement Policy**
  - Developed and adopted a Procurement Policy
- **Workplace Assessment**
  - Performed a scan of internal workplace processes ensuring compliance with local and federal regulations around working conditions across all locations.
- **Supplier Engagement**

Engaged our current suppliers via a Self-Audit to enforce transparency around their supply chain processes and working conditions.
- **Awareness Training**
  - 2020 Modern Slavery Awareness Training completed by All Staff

ASI will continue to monitor progress for this second Modern Slavery Statement, and set out targets against the following areas of focus for 2022/2023:

Area of Focus / Action Item	KPI (Key Performance Indicators)	Completion Date
<b>Policies</b> <ul style="list-style-type: none"> <li>• Annual review and update of ASI Policies incorporating industry best practice and adherence to federal and local regulation &amp; modern slavery guidelines</li> </ul>	All policies reviewed and updated	YOY
<b>Workplace Assessment</b> <ul style="list-style-type: none"> <li>• Annual supplier assessment</li> <li>• Action plans &amp; follow through</li> </ul>	All new suppliers 25% of existing suppliers audited  As necessary	YOY
<b>Modern Slavery Statement</b> <ul style="list-style-type: none"> <li>• Annual submission of Modern Slavery Statement</li> </ul>	Date of publication	YOY
<b>Supply Chain Procedures</b> <ul style="list-style-type: none"> <li>• Annual review and update of ASI Procurement Policy</li> <li>• Annual review of supply chain processes to ensure compliance with Modern Slavery guidelines</li> </ul>	Policy reviewed and updated. Annually	YOY
<b>Capability &amp; Culture Training</b> <ul style="list-style-type: none"> <li>• Annual compliance training to all staff including Modern Slavery awareness.</li> <li>• Culture-building, activities that reinforce a culture of inclusiveness, fairness, and equity for all staff.</li> </ul>	Deliver Modern Slavery Leadership training.  Participant Feedback & Effectiveness assessment	YOY

## Ongoing Wellbeing Initiatives

In the last year, ASI as a business was challenged by the COVID pandemic to shift and adapt the way we do business. This includes implementing the following measures:

- Supporting all our staff across the organisation by:
- Providing hybrid work arrangements for our staff,
  - Learning and development initiatives and
  - Implementing Parental Leave.

## Approval

This statement is approved by the ASI Executive Team as its principal governing body on 30 March 2023 covering the fiscal year 2022/2023.

Signed by

A handwritten signature in black ink, appearing to read 'Nathan Lowe', written in a cursive style.

**Nathan Lowe**  
Managing Director, ASI Solutions  
30 March 2023



## Annexure A - Supplier Self-Assessment Questionnaire

This questionnaire is [available online](#).

The following questionnaire asks for a summary of your organisation's approach to various policies that ASI Solutions considers paramount to their operations. You are required to answer "Yes" or "No" and provide further information whenever required. Please ensure that relevant documentation / attachments are sent back with the accomplished questionnaire.

Company Details	Response
<b>Company Information</b> This section asks for basic company information.	
Company Name	<i>Please provide details</i>
Company Address	<i>Please provide details</i>
Company Telephone Number	<i>Please provide details</i>
Company Status (Foreign, Private, Public, Subsidiary, Partnership, Sole Trader)	<i>Please provide details</i>
Date of Formation	<i>Please provide details</i>
Contact Name & Telephone Number	<i>Please provide details</i>
Contact	<i>Please provide details</i>

Vendor Policy & Practice	Response and further details
<b>Diversity &amp; Inclusion</b> ASI expects its suppliers to have in place a policy / procedure relating to diversity and inclusion, ideally focusing on flexible work arrangements, cultural diversity, gender inclusion, and reconciliation of Aboriginal and Torres Strait Islander peoples.	
Does your organisation have policies or similar strategies to create positive changes in the lives of Aboriginal and Torres Strait Islander people? If so, please provide a copy.	<i>yes/no</i>
Do you have policies or similar strategies that focus on gender & cultural diversity, LGBTI inclusion, and those with disabilities or experiencing disadvantage? If so, please provide a copy.	<i>yes/no</i>
Do you have policies (or similar strategies) that allows for flexible work arrangements? If so, please provide a copy.	<i>yes/no</i>

<b>Modern Slavery</b> The 2018 Modern Slavery Act requires ASI Solutions to disclose the steps it has taken to identify and address modern slavery risks in its supply chain. Please confirm what steps you have taken to identify and address modern slavery risks within your own organisation and supply chain by answering the questions below.	
Does your organisation outsource any part of its operations? If so, please state:	<i>yes/no</i>
The nature of the operations outsourced;	<i>Please provide details</i>
The country to which they are outsourced (if outside Australia)	<i>Please provide details</i>
Does your organisation use labour hire companies as part of its operations? If so, please confirm:	<i>yes/no</i>
Do you enforce controls to ensure workers' human rights are protected?	<i>yes/no</i>
Do you ensure that labour hire workers (if applicable) receive the same pay and conditions as direct employees?	<i>yes/no</i>
How many suppliers do you have, what do they do, and where are they based?	<i>yes/no; if Yes, please provide details</i>

<b>Supplier Standards</b> ASI expects its suppliers to abide by the minimum standards set out below. Please advise your compliance on each.	
<u>Relevant business laws</u> Does your organisation comply with all relevant legislation in carrying out your business operations?	<i>yes/no</i>
<u>Third parties/sub-contracting</u> Will you be using third parties or sub-contractors in supplying products and services to ASI? Please provide details if so.	<i>yes/no; Please provide details</i>
<u>Equal Employment Opportunity</u> Do you agree to adhere to the principles of equal employment opportunity in hiring, remuneration and all other aspects of employment, complying with state and federal legislation against discrimination due to characteristics including but not limited to race, gender identity, ethnicity, age, disability, religious or political beliefs, and potential or existing family responsibilities?	<i>yes/no</i>

<p><u>Wages and Benefits</u> Do you agree to pay employees at least the minimum legal wage of the applicable local jurisdiction, ensuring that all legally mandated benefits, entitlements, entitlements, and protections prescribed by local and international laws, are afforded to employees?</p>	yes/no
<p><u>Working Hours</u> Do you agree to comply with relevant state and federal legislation, Awards, and industrial instruments regarding working hours?</p>	yes/no
<p><u>Forced Labour</u> Do you agree to ensure that there is no forced labour within your business whether within your internal organisation and throughout your wider supply chain?</p>	yes/no
<p><u>Child Labour</u> Do you agree to refrain from using child labour (defined as any full-time work performed by children less than 5 years of age and comply with the rules in hiring children under 18?</p>	yes/no
<p><u>Work Health and Safety</u> Do you agree to always provide a safe and healthy work environment for all employees, in compliance with health and safety regulations, in order to prevent accidents, injuries, and work-related incidents, including precautions in keeping a COVID-Safe workplace? Please provide details if so.</p>	yes/no; if Yes, please provide details

<b>Workplace Conditions Checklist</b> ASI continuous commitment against modern slavery includes engaging our suppliers and external partners in terms of specific labour management practices that enable modern slavery in the workplace. Please advise whether the conditions below exist in your internal supply chain or in those of your secondary suppliers/vendors.	
<p><u>Background Check</u> Is a background check part of your organisation's tendering process for new suppliers/contractors?</p>	
<p><u>Employment of Vulnerable Populations</u> Does your and of your suppliers/vendors employ either directly or via third parties or subcontractors any of the following types of workers: Migrant Workers (those who have temporary or unofficial working rights in Australia), Minority populations, Unskilled workers providing manual labour</p>	yes/no
<p><u>Location</u> Do you and your suppliers/vendors have operations in locations with non-existent or poor implementation of labour laws as defined by the <a href="#">UN Guiding Principles on Business and Human Rights</a>?</p>	yes/no
<p><u>Recruitment Fees</u> Are there any hiring fees charged to your and your suppliers' /vendors' workers either up front or via a lending institution?</p>	yes/no
<p><u>Document Custody</u> Do you and your suppliers/vendors keep custody your staff's personal documents (such as passports) as part of the employment agreement?</p>	yes/no
<p><u>Informal labour engagements</u> Do you and your suppliers/vendors engage with workers informally, contracting them for work without employment agreements?</p>	yes/no
<p><u>Pay</u> Do you and your suppliers/vendors keep a record of workers' pay rates, work hours, and actual salary amounts paid?</p>	yes/no
<p><u>Overtime</u> Is regular overtime required of your and your suppliers'/vendors' workers? Is it within reasonable limits based on the Fair Work Act or other relevant local/federal regulation?</p>	yes/no