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Modern Slavery

Statement

2025



# Compnow Modern Slavery Statement 2025

## The Trustee for COMPUTERS NOW UNIT TRUST (Compnow)

ABN: 48 592 886 118

### Introduction

Modern slavery is a term used to describe situations where coercion, threats or deception are used to exploit victims and to undermine or deprive them of their freedom. The Australian Modern Slavery Act 2018 (the Act) is the first national legislation in the world to define modern slavery.

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. The worst forms of child labour refer to situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Modern slavery can occur in every industry and sector and has severe consequences for victims. It involves grave abuses of human rights and disproportionately impacts women and girls.

Modern slavery can also significantly impact business. It distorts global markets and undercuts responsible business. If not addressed, modern slavery can pose significant reputational and legal risks as well as damage commercial relationships for a business.

Compnow takes a zero-tolerance approach to any form of modern slavery and remains committed to acting ethically and responsibly, striving to improve conditions within its communities.

This Statement is intended to outline the steps being taken by Compnow to identify and minimise any risk of modern slavery occurring within its supply chain and operations.

### Our Structure

Compnow is a 100% Australian, privately owned, multi-vendor technology reseller and professional services provider. Established in 1991, we supply computing hardware, mobile devices and modern technology services to the public, education, and corporate sectors throughout Australia. We employ more than 500 skilled and experienced IT professionals across our five state office locations and warehouses.



Our core competencies include:

- Provisioning of desktop and mobile devices (Windows and Apple) with customised and flexible service options
- backup and disaster recovery strategies
- cyber and data security
- mobile device/ end-point deployment and management
- business process analysis and application automation relating to supply chain and procurement processes
- managed services
- technology financing solutions
- technology life cycle services including responsible and sustainable hardware re-purposing and recycling programs
- cloud services

## Our Corporate Values

Compnow's commitment to ethical business and employment practices fosters a culture to attract the highest calibre employees and shapes and enriches our relationships with each other and our customers.

Our Directors drive a culture of accountability and ensure our values are reflected in our operations and within the community, supply chain and client partners.

Compnow's corporate values, the "Compnow Way", are further supported by our Code of Conduct.

### The Compnow Way

- Be remarkable - Innovative, agile and strive for excellence,
- Create connections - Build great relationships and communities,
- Every voice counts - Be optimistic and a contributor,
- Do what's right - Integrity and ownership every time

## Operations

Compnow is a B2B company that provides customised solutions to solve our clients' IT challenges. Our clients come from a range of sectors including corporate, enterprise, small to medium businesses, government, health and aged care, higher education, and K-12 education.

Compnow's operations take place in Australia where the manufactured technology is staged and provisioned prior to being shipped to and installed at our clients' sites. Once implemented, Compnow also supports and manages the technology that we supply to our clients, both onsite and remotely.

Compnow also facilitates technology finance solutions ranging from purchasing, leasing arrangements, master rental agreements, device as a service and other asset finance models.

Compnow has long term relationships with our vendors, manufacturers and suppliers. We invest in training to obtain certifications and qualifications in the various technologies. This ensures our personnel are skilled in rapidly emerging technologies paramount to our business success.

Compnow's operations also include in-house software development, supply chain management, marketing, sales, customer support and administrative functions.

Compnow respects ethical labour practices and will not permit any human slavery or similar abuse, and values staff inclusion and diversity. All employees, directors, contractors and suppliers must comply with Compnow's Code of Conduct.

The Code is complemented by a suite of additional policies and procedures. Our commitment to eliminating modern slavery in our operations and supply chain is reinforced in the following documents:

- Compnow Code of Conduct
- Supplier Code of Conduct
- Human Rights Policy
- Equal Opportunity Policy
- Whistle blower policy
- Anti-bribery and Corruption policy
- Diversity and Inclusion Policy
- Recruitment Policy

## Supply Chain

As a reseller, Compnow does not manufacture its own goods; we partner with market-leading IT manufacturers, suppliers and distributors. Many of the goods we procure have complex supply chains containing multiple suppliers and manufacturers.

We have approximately 20 mainstream suppliers and vendors, and up to 100 others that provide goods and services in support of our operations. Our suppliers and vendors operate in more than 41 countries and territories, with many manufacturers based throughout Asia.

Compnow's vendors and suppliers are well-established and provide a level of transparency of their business operations and supply chains in relation to Modern Slavery. Compnow carefully evaluates its supply chain to identify any risk of illegal or unethical behaviour such as engaging in human trafficking, slavery or other human rights violations.

A list of Compnow's technology and Solution partners can be found here:

<https://www.Compnow.com.au/our-partners/technology-partners/>

## Risks of Modern Slavery Practices in our Operations & Supply Chains

Compnow recognises that modern slavery risks can occur at various levels of the supply chain, particularly in industries and geographies with complex sourcing practices or limited transparency.

Our largest suppliers are well established leading technology manufacturers that demonstrate transparency by reporting their efforts to eradicate modern slavery from their operations and supply chains. We also acknowledge that certain risks may exist, particularly in the indirect and lower tiers of our supply chains.

These include:

- Technology products – As a reseller of IT hardware, Compnow acknowledges that some goods have historically been produced under conditions associated with modern slavery, such as forced labour in manufacturing or the exploitation of workers in raw material extraction.
- Smaller supply chains – Compnow works with several smaller suppliers who, due to their size, may not be subject to the same legislative requirements as larger organisations. These suppliers are not always required to formally account for their labour practices or undertake due diligence on their own supply chains. While no specific risks have been identified to date, we acknowledge the potential for significant risk in this area.

## Actions to Manage and Mitigate Risks

Compnow is committed to increasing transparency across our operations and supply chains and to provide clear, consistent communication about our approach. We recognise that managing modern slavery requires a multi-layered approach that combines awareness, proactive engagement, and meaningful safeguards to reduce and address risks.

## Policies & Procedures

Our organisational frameworks, policies, and procedures set out our intent, expectations, and responsibilities in relation to modern slavery. These documents are regularly reviewed and updated to reflect evolving standards, stakeholder expectations, and lessons learned. They form the foundation of our risk management practices and reinforce our zero-tolerance approach to modern slavery.

## Supplier Code of Conduct & Expectations

Compnow fosters mutually beneficial partnerships with suppliers who align with our values and demonstrate a commitment to ethical practices. To strengthen accountability, we have developed a Supplier Code of Conduct which clearly communicates our expectations regarding labour standards, human rights, and modern slavery. The Code also outlines our approach to corrective action in cases where risks or non-compliance are identified. Suppliers must comply with these standards as a condition of doing business with Compnow.

## Due Diligence

Compnow undertakes regular risk-based assessments to identify, evaluate, and prioritise areas where modern slavery risks may exist within our operations and supply chains. These assessments consider a range of factors, including the nature of goods and services procured, the geographic locations of suppliers, the use of vulnerable labour, and industry-specific risk indicators. The findings of these assessments help shape our approach to mitigation, ensuring that our actions are targeted, proportionate, and effective in addressing the areas of greatest concern.

## Monitoring, Audits & Enforcement

To ensure compliance with our standards, Compnow has implemented monitoring and enforcement mechanisms across our supplier base. These include:

- Supplier questionnaires and due diligence checks – used to gather information on suppliers’ practices, policies, and risk management processes.
- Contractual obligations: suppliers are required to comply with Compnow’s Supplier Code of Conduct and relevant legislation, with non-compliance constituting grounds for remediation or termination of the business relationship.
- Audits and assessments: where risks are identified, Compnow may conduct internal reviews or commission third-party audits to verify compliance and working conditions within supplier operations.
- Corrective action plans: suppliers found to be non-compliant or at risk are required to implement corrective measures within agreed timeframes, with progress tracked and reviewed by Compnow.
- Escalation and termination: if a supplier fails to demonstrate genuine commitment to addressing risks or refuses to comply with corrective actions, Compnow reserves the right to escalate the matter, suspend orders, or terminate the relationship.

Through this structured compliance framework, Compnow reinforces our commitment to transparency, accountability, and the elimination of modern slavery risks across our operations and supply chains.

## Whistleblower Policy

Compnow's Whistleblower Policy is a key mechanism in our approach to identifying and addressing modern slavery risks. The policy provides employees, contractors, suppliers, and other stakeholders with a secure and confidential process to report concerns about suspected modern slavery or related exploitative practices in our operations and supply chains.

Whistleblowers are protected under this policy, with strict safeguards in place to ensure confidentiality and protection from retaliation, victimisation, or any form of disadvantage. Reports can be made anonymously, and individuals are encouraged to raise concerns where they believe practices such as forced labour, debt bondage, human trafficking, deceptive recruitment, or other forms of exploitation may be occurring.

All modern slavery related disclosures are investigated promptly and in line with Compnow procedures. Where substantiated, findings are escalated to senior management and, where appropriate, to executive management or relevant oversight committee. Outcomes may include requiring suppliers to implement corrective action plans, closer monitoring of supplier practices, or disengagement where risks cannot be effectively mitigated. In addition, matters of significant concern are reported to regulators or law enforcement, in line with legal and compliance obligations.

## Employee Training & Awareness

All Compnow staff members are required to complete Modern Slavery Awareness training as part of their onboarding process, ensuring that awareness begins from the very start of their employment. This mandatory learning module introduces employees to the concept of modern slavery, highlights the potential risks that may arise in our operations and supply chains, and provides practical guidance on how to recognise warning signs and report concerns appropriately. To reinforce and maintain this knowledge, staff are also required to complete annual refresher training, which ensures ongoing awareness and understanding of modern slavery risks. This annual training allows us to update employees on any changes to legislation, emerging risks, and organisational policies or procedures, while also reinforcing the critical role they play in identifying and preventing modern slavery. By embedding both induction and ongoing training into our practices, we foster a culture of vigilance, accountability, and responsibility, ensuring that every staff member is equipped to actively contribute to the prevention and elimination of modern slavery.

## Measuring Effectiveness & Continuous Improvement

Since March 2025, Compnow has appointed a dedicated Social Responsibility Manager charged with measuring the effectiveness our risk mitigation strategies and, developing and implementing a range of continuous improvement initiatives:

- Proactively seek to increase the level of visibility on the origin of goods and services before delivered to Compnow,
- Continuous development of our supplier due diligence and assessment,
- Assessment of the effectiveness of modern slavery strategies within the reporting period,
- Audits of our first and second tier suppliers and vendors to ensure compliance to modern slavery laws,
- Review of higher risk suppliers to ascertain if circumstances have changed,
- Continue to engage and promote awareness by our employees, suppliers and external partners of modern slavery issues and reiterate our expectations of zero-tolerance to modern slavery,
- Continue company-wide training programs ensure all employees are equipped to address modern slavery risks.

The Compnow Modern Slavery Statement is made pursuant to The Modern Slavery Act 2018 (Cth) for the year ending on 30 June 2026.

This statement was approved by the board of trustees for The Trustee for COMPUTERS NOW UNIT TRUST on 9<sup>th</sup> September 2025.

Robert Ruigrok  
Director and Chief Financial Officer



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Signature

Date: 09/09/2025