



# MODERN SLAVERY STATEMENT

*15 December 2021*

## INTRODUCTION

The Modern Slavery Act 2018 ('Act') commenced operation on 1 January 2019. The Act aims to combat modern slavery in global supply chains. The United Nations and Walk Free Foundation estimate there are approximately 40 million victims of modern slavery around the world. The Act creates reporting obligations for Brennan (defined in Structure below) including producing an annual Modern Slavery Statement ('Statement') and examining modern slavery risks within Brennan's supply chain.

## COMMITMENT

This statement is made pursuant to sections 14 and 16 of the Act and outlines the steps Brennan is taking to ensure modern slavery and human trafficking does not form part of its organisation or supply chain. Brennan is committed to continuous improvement to meet its responsibilities under the Act.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Brennan adheres to high ethical standards which are at the centre of its operations. Decisions and processes in its supply chain are made with careful consideration of these ethical standards. As such, Brennan aims to partner with people and companies that align with these standards.

### Structure

This statement covers the activities of Brennan VDI Pty Ltd (the 'Reporting Entity') and its subsidiaries ('Brennan') as listed below:

- Brennan IT Pty Ltd
- Brennan Voice and Data Pty Ltd
- Brennan Telephony Pty Ltd
- Superfluid Solutions Pty Ltd
- Brennan IT (Singapore) Pte Ltd



- Brennan IT (India) Pte Ltd
- Brennan IT NZ Pty Limited
- Forsythes Technology Group Pty Limited
- Forsythes Technology Pty Ltd
- Forsythes IT & Communications Pty Limited

### Direct Operations

Brennan is an Australian private owned company founded in 1997 with operations located in Australia, New Zealand and India. Brennan manages the end-to-end IT environments of its clients spanning hybrid infrastructure, hosting, cloud, networking, unified communications, user and device support, professional service consultants, project services, and cyber security requirements. Brennan's clients are spread across a broad range of industries including healthcare, manufacturing, superannuation, and retail. Brennan's direct workforce comprises over 550 employees with the majority based in Australia.

### Supply Chain

Brennan's supply chain consists of engaging IT service providers, procurement of IT related products and office related costs such as facilities management, office amenities and office consumables. Brennan has over 500 active suppliers. These suppliers are primarily located in Australia.

## RISK MANAGEMENT

### Direct Operations

Brennan operates in a regulated environment and has robust employee policies and procedures in place. As part of Brennan's ISO 27001 certification, employment controls including right-to-work, are tested and confirmed by third party auditors. Brennan's employees are primarily skilled white-collar professionals and are considered lower risk for modern slavery. Brennan's employees are based in Australia, New Zealand and India. Geographically India is considered higher risk, however, given the nature of the work (white-collar professionals), and compliance with recent Indian labour law changes including Labour Law Bill 2020, modern slavery is not considered to be a high risk.

### Supply Chain

Brennan has assessed its supply chain and overall considers there to be minor areas of risk. Based on Brennan's analysis of modern slavery risk factors, principally geography and sector, risk is limited to Brennan's procurement of IT hardware, specifically hardware manufactured in Asia. We acknowledge that we lack visibility in overseas markets of secondary levels of our chain of suppliers and source materials used in our group's goods and services. This risk is mitigated by Brennan's procurement of IT hardware primarily from large regulated international suppliers such as Hewlett-Packard.



## DUE DILIGENCE

Brennan is committed to ensuring that its operation and supply chain is free of any human rights violation and where potential risks are identified, that these are quickly addressed.

The appropriate action will depend on whether Brennan has caused the impact, contributed to the impact, or is linked to the impact through its business relationships. In instances where Brennan has caused the impact, actions will be taken to cease or prevent the risk. In instances where Brennan has contributed to the impact or is linked to the impact through our business relationships, Brennan will act and leverage our position to mitigate the remaining risk as much as possible.

### Direct Operations

Brennan has policies and guidance for employees including, but not limited to:

- Modern slavery policy
- Whistle-blower policy
- Employee code of conduct
- Leadership Training
- Corporate social responsibility policy
- Anti-bribery and anti-corruption policy

### Supply Chain

The due diligence included an audit of all active suppliers. The audit involved the following steps:

1. Classification of all suppliers into three risk categories – higher risk, medium and lower risk. Factors considered in risk classification included geographical location, sector and probability of continued use or re-engagement
2. Online search of all suppliers for relevant modern slavery statements and disclosures
3. As part of Brennan’s commitment to raising awareness of modern slavery across its supply chain, higher and medium risk category suppliers were sent a Brennan questionnaire requesting information on their compliance within the requirements of the Act,

To date Brennan has received a 46% response rate for higher risk suppliers, and 27% for medium risk suppliers. Brennan continues to follow up for responses. Brennan revised its supplier code of conduct in the previous reporting period to include an expectation of assistance from suppliers to enable Brennan to assess if the supplier is compliant with the Act, and therefore suitable for Brennan to engage with.



## GRIEVANCE & REMEDIATION

Brennan continues to provide avenues for affected employees to safely raise concerns about modern slavery in Brennan's operations and supply chain. As Brennan's approach to modern slavery develops there is an increasing probability that it will encounter modern slavery in its supply chain. Brennan continues to monitor and respond to potential modern slavery incidents. No grievances were raised in the reporting period.

## ASSESSING EFFECTIVENESS OF OUR RISK MANAGEMENT

The effectiveness of the modern slavery process is measured by a few key metrics.

### Direct Operations

Brennan conducts annual benchmarking of staff salary packages to ensure staff are fairly and appropriately remunerated. Numerous additional employee benefits are provided to all employees and regularly assessed by management.

### Supply Chain

As part of the due diligence process Brennan conducted an audit of all active suppliers. Brennan continues to engage with suppliers directly to ensure their supply chains are free of modern slavery risks. Brennan monitors the active supplier listing, and correspondence / results of questionnaires, ensuring an increasing number of suppliers are deemed low risk for modern slavery.

In the current reporting period, a process was put in place for all new suppliers to complete the questionnaire prior to engagement with Brennan, combined with the supplier code of conduct revised in the previous reporting period.

## FUTURE COMMITMENTS & NEXT STEPS

Brennan will work to increase collaboration with internal and external stakeholders to prevent and address any contribution that Brennan may have to the global issue of modern slavery. Brennan will achieve this by focusing on raising awareness of the forms of modern slavery among its employees and suppliers, continuing to evolve its due diligence processes to aid in the identification of risks, expanding the scope of its supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout its supply chain. Further initiatives planned include:

- Further review of and engagement with potential high-risk suppliers who did not respond to Brennan's questionnaire
- Continually review and assess low and medium risk rated suppliers
- Continue to engage with the employees and suppliers of Brennan IT (India) Pte Ltd
- Provide further training to employees on modern slavery



## CONSULTATION & APPROVAL

This statement is made pursuant to sections 14 and 16 of the Act. It has been made available for comment and review by the Brennan Senior Leadership team and constitutes the statement for the year ended 30 June 2021. The statement was approved by Dave Stevens as the Sole Director (the 'Principal Governing Body') and Belinda Giles as the Chief Financial Officer of Brennan VDI Pty Limited on 15 December 2021. We consulted the relevant companies we own or control in the development of this statement. The statement will be updated annually.

Dave Stevens  
Sole & Managing Director  
Brennan VDI Pty Limited  
15 December 2021

Belinda Giles  
Chief Financial Officer  
Brennan VDI Pty Limited  
15 December 2021