



## CDM Australia Group of Companies Anti-modern slavery statement - 30 June 2025

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by CDM Australia (“CDM”) and its wholly owned subsidiaries to address modern slavery and human trafficking risks in our business and supply chain over the financial year ending 30 June 2025.

### **Identification of the Reporting Entity**

**CDM Australia Pty Ltd** (ABN 68 009 592 965) is reporting on behalf of itself and its wholly owned subsidiaries, **Aria Communications Pty Ltd** (ABN 22 090 723 925) and **Pacific Paper Industries Pty Ltd trading** as Winthrop Australia (ABN 74 043 852 709), in relation to how we are addressing the issue of modern slavery within our operations and supply chains.

We oppose all forms of modern slavery practices and are committed to eradicating these practices from our own operations and supply chains. Modern slavery can take many forms, even in Australia, and some of its forms include forced or compulsory labour, servitude, trafficking in persons, debt bondage, forced marriage, forced prison labour and child labour. We are committed to identifying, preventing, mitigating and remediating modern slavery impacts connected to our business.

We recognise that as a large purchaser and supplier of a diverse range of products and services, we must embed appropriate practices in our business and seek to work with suppliers who are aligned to our values.

In this statement, we set out the actions CDM has taken to recognise and minimise the risk of modern slavery in our business operations and supply chain in the reporting year ending on 30 June 2024.

### **Structure, operations and supply chains of the reporting entity**

CDM has a wide range of services and products including professional and technology management services, security offerings and management, hardware and software reselling. CDM employs around 200 people located around Australia.

CDM’s businesses operate in Australia and New Zealand. Our suppliers range from large global providers to small businesses, mainly based in Australia, New Zealand, Asia, the United States of America, and the European Union.

Our relationships include suppliers from the following sectors: technology, hardware and equipment, facilities management, waste management, office supplies, catering, cleaning, labour hire, professional services and marketing. We utilise these products and services in our businesses, and we also operate as a reseller of products and services such as software, technology infrastructure and associated hardware.

## **Risks of modern slavery practices in the operations and supply chains of the reporting entity**

Our risk assessment and prioritisation of work focuses on the aspects we consider to be a higher risk and coincide with a broader programme of work to improve and consolidate our procurement practices generally within CDM. We also pay greater attention to the modern slavery risks that would cause the greatest harm to individuals.

We have assessed our internal operations and identified that our operations present a lower risk of modern slavery. As a part of this assessment, we paid particular attention to areas that could be considered to be higher risk such as operations outside Australia undertaken by businesses within the wider CDM group, recruitment practices and temporary workforce arrangements.

Our employees are employed on contracts with standard terms allowing the employee to terminate their employment on notice and all employees are paid at or above the relevant minimum wage or other award or entitlement bands. We have a small number of casual and contracted employees and these individuals go through a standardised recruitment process to ensure they are valid employees and are engaged in accordance with at the least, minimum standards of employment. Furthermore casual labour is routinely identified for permanent positions with the group.

We also recognise that some of CDM's operations, namely its activity in New Zealand, operates outside Australia. CDM does not employ staff in this region and engages suppliers and distributors to fulfill customer requirements. While these operations are not controlled by CDM, we ensure they are operated by reputable globally responsible employers. This includes considering and reviewing processes and systems and conducting interviews and discussions with key representatives. We will continue to work with these businesses to assess in more detail.

We have also assessed the suppliers to our operations within our broader supplier assessment categorisation and will prioritise working with these suppliers further according to the higher risk categories we identified as a part of the general supply chain review and procurement consolidation process we are undertaking at CDM, as part of our ISO 9001 certification.

For our supply chain, as a result of our supplier risk assessment outlined above, we identified very low-risk suppliers through to those within a potentially high-risk category. In the higher risk category, we identified suppliers of technology products and services (for both internal use and on-supply or resale to customers), cleaning, maintenance services, field services, application development services, construction and building works, freight, catering, office supplies, waste management and marketing products.

We also understand that our suppliers have their own suppliers, which may also connect us to modern slavery risk. We do not currently have a detailed understanding of this risk beyond our first-tier suppliers. We are aware, however, of some industry risks that will be in the lower tiers of our supply chain.

Our Whistleblower policy is designed to provide individuals within CDM team the opportunity to raise and address risks of modern slavery and encourage our employees, contractors and suppliers to report and act on any modern slavery concerns. Where concerns are investigated and substantiated, we are committed to taking appropriate action.

## **Actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes**

Our activities in the current reporting year to 30 June 2025 focused on undertaking a scoping exercise of our potential risks, the update of policies, creation of supplier assessment documentation, and contractual provisions. This has allowed us to better understand our principal areas of risk and will enable us to embed the programme in the next reporting year.

We continued to undertake annual review, consisting of a number of activities to recognise, map and address modern slavery risk in our operations and supply chain. These activities included:

- Undertaking an initial, high-level modern slavery risk assessment to identify and assess the risk of modern slavery according to industries, products and services, geographic locations and business models. This was conducted on a line of business level and involved the business leadership and key stakeholders;
- Review of Modern Slavery Statements for our top 10 suppliers and customers to ensure their processes and review are adequate to ensure they are compliant and acting in a responsible way, and to ensure services received and performed with these parties are not contributing to the problems of modern slavery.
- Maintaining and updating a whistleblower policy to provide an avenue for a variety of stakeholders to raise concerns and reassurance these concerns will be addressed in a timely and confidential manner – without the fear of any reprisals or victimisation;
- Maintaining a supplier on-boarding procedure as part of ISO 9001 certified procedures, including supplier due diligence involving the business, finance, sales enablement and procurement stakeholders;
- Engaging with all lines of business and communicating awareness of modern slavery risks to CDM employees.

During the risk assessment process, we considered potential risks that may possibly cause, contribute and be directly linked to modern slavery practices, in accordance with the Australian Government's Department of Home Affairs draft guidance document (2018).

Over the next year (ending 30 June 2026), our key focus areas will be:

- Continuing with internal stakeholder engagement and ongoing review of business practices, including delivering appropriate awareness training on modern slavery principles to relevant lines of business;
- Embedding our existing policies, including this statement into CDM's quality assurance processes, and Governance Board reporting and review;
- Developing expertise in risk in the IT products we resell so that we can educate our customers in relation to that risk, given that they are often the decision-maker in relation to the IT products that we supply to them.

## **How the reporting entity assesses the effectiveness of such actions**

We intend to continue with our actions listed above, and importantly, continue to educate and train our business lines so they are alert to the risks. We plan in time to develop a program of monitoring and auditing of our anti-modern slavery programme, including reviewing selected suppliers.

This statement will be incorporated as part of the ISO 9001:2015 quality assurance program and accreditation, namely CDM processes, audit and continuous improvement practices to ensure that the policy and its requirements are measured, reported and acted upon.

Most importantly, we recognise this is not a static programme. We will seek to adopt a process of continuous improvement, assessing if processes are up-to-date and effective, and will endeavour to focus on the areas with the highest potential impact on people.

### **Process of consultation with entities that the reporting entity owns or controls**

CDM Australia Pty Ltd owns 100 per cent of Aria Communications Pty Ltd, and controls Pacific Paper Industries Pty Ltd which operates Winthrop Australia. These entities operate as part a fully integrated business in Australia, with a central CDM board, leadership team and shared administration and logistical corporate support function that supports all lines of business (including HR, risk, property, procurement, finance and legal).

The consultation process included working with representatives of all lines of business dealing with procurement, human resources, business operations, sales and finance, risk and legal. This included interviews, sharing and completion of risk review documentation, analysis and agreement on prioritisation, review of underlying data and documents including contracts, supplier information and the procurement analysis of suppliers.

Individual Reporting Entities directors, and the Group leadership team as a whole, were made aware of the anti-modern slavery programme proposed, consulted on the programme's planned content and application. They have fully supported the Group-wide adoption of our programme.

### **Approval**

CDM approve this statement on behalf of the Governance Board of the Reporting Entities and the wider CDM Group.



Camillo Della Maddalena  
Managing Director  
CDM Australia Pty Ltd