

Datacom Anti Modern Slavery Statement RYE 2023

*This statement is made in accordance with the Modern Slavery Act 2018 (Cth) for the year ending on 31 March 2023 ('**RYE 2023**') by **Datacom Australia Holdings Pty Limited** (ABN 45 094 235 373) and its '**Reporting Entities**' (jointly '**Datacom**').*

Summary

This is now our fourth AMS Statement. Datacom continues to take the issue of modern slavery seriously. We have voluntarily extended our reporting to include all the companies owned and controlled by Datacom Group Limited (our parent company in New Zealand).

In this reporting year to 31 March 2023, we continued to make steady progress, and we believe we have put in place a good foundation for addressing the issue of modern slavery within our operations and supply chain going forward.

Actions have we taken in RYE 2023
<p>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</p> <ul style="list-style-type: none">• On 30 June 2022 we shared with our staff through our Intranet our AMS Statement including a summary of why this programme is important and how it is relevant to Datacom and its supply chain. It was well received.• Earlier in June 2022 we launched a toolkit for managers within Datacom, with a presentation designed to train and explain the key AMS issues, how they can arise in a Datacom setting and how AMS risks can be managed. This included presenting to our Asian business leaders by the Head of our Asian Operations.
<p>Continuing to remind people about our policies, including through ongoing compliance training</p> <ul style="list-style-type: none">• The compulsory training modules for all staff within Datacom contain updated AMS information and test questions. All staff are required to complete these modules by 31 March 2023.

¹ Our Reporting Entities are companies owned or controlled by Datacom Australia Holdings Pty Limited or companies in the Datacom Group carrying on business in Australia, being **Datacom Data Centres Pty Limited** (ABN 58 110 978 179), **Datacom Systems (AU) Pty Limited** (ABN 39 135 427 075), **Datacom Connect Pty Limited** (ABN 16 103 112 303), **Datacom Solutions (AU) Pty Limited** (ABN 16 168 988 636), **Datacom New Zealand Limited** (a New Zealand incorporate company, ABN 95 875 120 116), **Datacom Systems Limited** (a New Zealand incorporate company, ABN 84 189 277 546), and **Datacom Solutions Limited** (a New Zealand incorporate company, ABN 61 011 044 349).

<p>Continuing our new supplier on-boarding procedures and supplier due diligence, as well as implementing our revised supplier contract terms</p> <ul style="list-style-type: none"> • All our new suppliers go through a thorough on-boarding process and risk assessment – including for AMS issues • Our new supplier contract templates have been rolled out and are in use. These include clauses designed to ensure AMS awareness and compliance
<p>Extending the new supplier due diligence and risk assessment process to our key existing suppliers. We will prioritise the existing suppliers by spend, and work through the remainder of the supplier community systematically</p> <ul style="list-style-type: none"> • Our top 502 suppliers were surveyed for overall compliance and risk • A smaller list of our top 50 suppliers by value was created together with identified contact points matched to areas of our business who manage the relationships. These top suppliers were then separately contacted to assess AMS risk and other compliance areas
<p>Designing a programme to monitor and assess compliance within our entire supplier community and address any areas of remediation</p> <ul style="list-style-type: none"> • In addition to our top 50 suppliers, the Procurement Team then assessed responses from the onboarding process, the initial survey, and categories of spend, to add to that top 50 list any perceived high or medium risk suppliers. This created our planned Verification List
<p>Design an ongoing verification programme for our entire supplier community</p> <ul style="list-style-type: none"> • One of the main findings from our initial survey and follow up with our top 50 suppliers, was large multinationals simply did not respond. We will continue to perform due diligence on them using publicly available information (website policies, media statements, industry forums) • Our Verification List now it is created, and can be worked through by our Procurement Team with support from the relationship managers for those suppliers in the next reporting year

In relation to next reporting year, the following are our planned areas of focus:

<p>Our planned actions for next reporting year RYE 2024 (ending 31 March 2024)</p>
<p>Implementing our planned Verification Programme, using our initial Verification List to contact and follow up with our identified suppliers</p>
<p>Conducting due diligence on our large multinational suppliers using publicly available information</p>
<p>Continuing compulsory, annual mandatory training for all staff in AMS matters and general compliance initiatives</p>

Continuing our supplier on-boarding procedure and supplier due diligence; supplier risk assessments and use of supplier template contracts
As part of our reassessment of our Asian businesses, reinforcing the importance of AMS compliance and vigilance in our supply chains – this includes training business leaders and making them aware of the potential issues
Continuing to have visibility of AMS risks and remind Datacom staff of our ongoing programme of work in this area

Background

Modern slavery is often the unseen global social evil for Australian and New Zealand companies. Modern slavery can take many forms, and even in Australia, New Zealand and the other countries in which we operate, modern slavery still exists. Some of its forms include forced or compulsory labour, servitude, trafficking in persons, debt bondage, forced marriage, forced prison labour and child labour.

We oppose all forms of modern slavery practices and are committed to identifying, preventing, mitigating and remediating modern slavery impacts connected to our business and our supply chains.

In New Zealand we have continued to support the actions of World Vision who has been leading the vocal support from many large New Zealand businesses to encourage the New Zealand Government introduce similar legislation to that of the *Modern Slavery Act*.

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.

Our structure, operations and supply chains

Datacom works with organisations and communities around the world to solve their biggest challenges, imagine new possibilities, and help move them to a better place by connecting people and technology.

Built on strong local values, world-class technology, and experienced people who genuinely care, Datacom sets a new standard in IT services. Datacom supports customers through a broad range of services and solutions that span technology, operations, digital and products, all underpinned by robust industry experience and insight. We have people working across Australia, New Zealand and Asia, Datacom is truly world-class in capability, and proudly local at heart.

Datacom has a wide range of services and products including professional and technology management services, data centres, cloud services, integrated SaaS solutions, security offerings and management, hardware and software reselling, and contact centres. Often our customer selects the IT technology that we procure for on-supply. That means that although these suppliers are within our supply chain, we do not make the procurement decision. These suppliers are still subject to the same on-boarding procedures and risk assessment.

As at 31 March 2023, Datacom employs around 6,500 people, with around 2,600 in Australia, over 3,600 people in New Zealand, and around 300 in Asia.

The majority of Datacom Group's businesses operate throughout Australia and New Zealand, with some technical and support operations in Malaysia (Kuala Lumpur) and the Philippines (Manila), and a very small satellite function in Singapore.

Datacom Australia Holdings Pty Limited is a wholly owned subsidiary of Datacom Group Limited and operates the Australian business. All controlled entities within the Australian business are wholly owned by Datacom Australia Holdings Pty Limited.

You can find further information about Datacom in our latest Annual Review on our website: www.datacom.com.

We work with over 3,500 suppliers and partners globally. Our suppliers range from large vertically integrated 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 use these products and services in our business, and we also operate as a reseller of products and services such as software, technology infrastructure and associated hardware.

Potential modern slavery risks

Our risk assessment and prioritisation of work focussed on the aspects we considered to be higher risk and then ensuring we could embed them into our procurement practices generally within Datacom. We have also paid greater attention to the modern slavery risks that would cause the greatest harm to individuals.

Internal operations

We re-assessed our internal operations and identified that our operations present the same risks we identified in our Anti-Modern Slavery Statement for previous years. That is, overall we have a lower risk of modern slavery.

As a part of this assessment, we paid particular attention to areas that could be higher risk such as operations outside New Zealand and Australia undertaken by businesses within the wider Datacom Group, recruitment practices and temporary workforce arrangements.

Most of our workforce are permanent employees and would be considered to be in the higher skill and lower risk brackets. 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.

Previously to this year, we did use a large number of temporary workers from time to time for “surge” resourcing in Australia for use in contact centres - supplied directly through our recruitment and temporary workforce providers. These providers are at the “high-end” of reputability and employ these workers, who we then induct, train and manage.

However, we have pivoted away from this type of business and moved into higher value-chain work in our contact centres – enabling us to pay more and provide a better career path for permanent employees without the need for large numbers of casual or temporary staff. We still do employ some independent contractors and agency provided staff.

Finally, in our supplier chain we have only a few individual contracted workers. These are largely individuals with specialised skills or experience and are engaged as professional contractors at market rates.

We also recognise that some of the Datacom Group’s operations in countries outside New Zealand and Australia are in higher risk geographies (particularly in Asia).

While these operations are not controlled entities of Datacom Australia Holdings Pty Limited, the services they provide are used by the wider Datacom Group. To address the geographic risk, we have performed a high-level review of the operational practices of our offshore businesses and consulted with them to explain and help identify any potential modern slavery risks. This included considering and reviewing processes and systems and conducting interviews and discussions with key representatives. We are currently reassessing our business models in our Asian businesses and will be further working to align the businesses to reinforce the “One Datacom” approach.

We have rolled out our company-wide mandatory training in human rights and anti-modern slavery to all employees in our Asian businesses (along with other security, privacy and business practice compliance).

We will be looking to do more on-ground training and discussions with staff in Asia in the future – now regional travel is becoming more normalised after Covid-19.

Supply chain

For our supply chain, because 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, temporary workforce augmentation and marketing products.

There is still more work for us to do to dive deeper into our major suppliers to look at specific geographies and actual practices of the specific suppliers.

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. Some of our suppliers that provide IT hardware, for example with rechargeable batteries, will have significant modern slavery risk in their supply chains. This is an area for further work in the next reporting years.

We have implemented an on-boarding process which applies to all new suppliers in Australia and New Zealand. This has worked well and produces a risk-based result depending on their responses. High-risk or non-compliant suppliers are then escalated to business for follow up, and if still unacceptable, not on-boarding that supplier.

We need to focus in future years on rolling this into our existing supplier base, and our associated business partners we may work alongside.

Our *Human Rights Policy and Protected Disclosure Policy* (“Whistleblower Policy”) specifically recognise the risk of modern slavery and encourages 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. Further information regarding the investigation process is publicly available in the Whistleblower Policy on our website (<https://datacom.com/au/en/legal/protected-disclosure-policy>).

The action that our senior management team has committed to, led by our Head of Legal & Commercial, is to promptly respond to any complaint or identified modern slavery issue or risk, working with the relevant supplier to manage that risk, try to remediate any harm caused, and agree processes to prevent from happening again. If cooperation is not forthcoming in a satisfactory manner, termination of the supplier

contract may be warranted. Our preference, however, is to work with suppliers so that they can improve the conditions and rights of workers and require that those suppliers remediate any harm caused.

COVID-19 impact

With the severe impacts of Covid-19 now behind us, we do not see any increased risk of modern slavery in our supply chain due to the COVID-19 disruptions in this reporting year.

Assessment of our effectiveness

We believe that we have effectively put in place the initial foundation to assess and mitigate the risks of modern slavery in our internal operations and supply chain and have started the process of raising awareness on this important topic. We are pleased that we have embedded a process to assess and work with all new suppliers.

While we have good processes in place to assess suppliers, we still have information gaps and need to follow-up on some of the larger multinational suppliers to confirm their compliance with acceptable standards.

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

We understand this is not a static task but a programme of activity to continue over time. We will seek to continue to focus on the areas with the highest potential impact on people.

Consultation with the Reporting Entities

Datacom Australia Holdings Pty Limited owns 100% of our Reporting Entities, and Datacom Group Limited owns 100% of any Datacom Group company carrying on business in Australia. These entities operate as part a fully integrated business in Australia and part of the wider Datacom Group, with a central Datacom Group Board, centralised leadership team from all lines of business and a Datacom Group 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, to update this Statement.

DATAKOM

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

This Statement has been approved by the Board of Directors of Datacom Australia Holdings Pty Limited for itself and each of the Reporting Entities on 27 June 2023.



Alex Coates – **Director**

DATAKOM AUSTRALIA HOLDINGS PTY LIMITED

Datacom Group Limited also approve this statement on behalf of the Board of Datacom Group Limited.



Tony Carter – **Chair**

DATAKOM GROUP LIMITED