

Modern Slavery Statement

Dialog Pty Ltd ACN 010 089 175

Statement Period: 1 July 2021 to 30 June 2022

Introduction

- We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains.
- This statement, which is intended to meet the requirements of the Modern Slavery Act 2018 (cth), highlights how we have applied the principles to assess and address modern slavery risks in our operations and supply chains, and the steps taken by Dialog Pty Ltd ACN 010 089 175 (trading as Dialog Information Technology) and all of its controlled entities (we, us, our) during the financial year ending 30 June 2022 to seek to minimise the risk of modern slavery occurring in our business and supply chains.

Our business

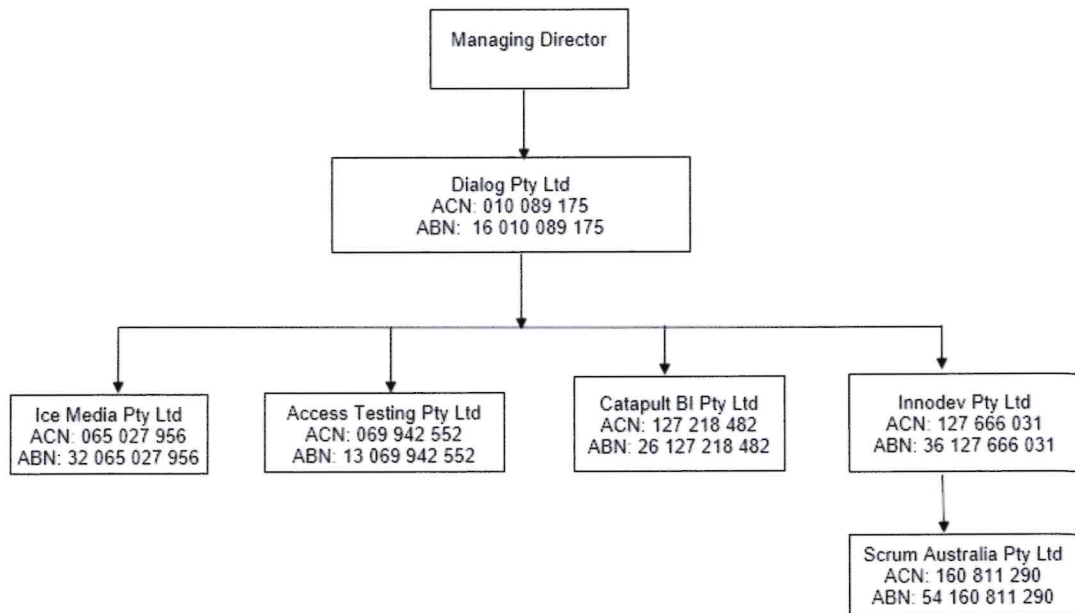
- Established in 1979, Dialog Pty Ltd (trading as Dialog Information Technology) is Australia's largest, privately owned information technology professional services organisation. Dialog provides information technology services to corporate and government organisations in a variety of industries using multiple technologies.
- Our Group employs more than 1,000 information technology professionals working from offices in Adelaide, Brisbane, Canberra, Darwin, Melbourne, Geelong, Sydney and Perth with the majority of employees working in the eastern states of Australia.
- The services we procure are predominantly provided in Australia and New Zealand.
- In April 2022, NCSI Holdings Pte. Ltd., a wholly-owned subsidiary of Singapore Telecommunications Limited acquired 100% of the share capital of Dialog Pty Ltd and its subsidiaries. In the 2022 financial year, there have been no changes to the Group's operation and its supply chains as a result of this change.

Organisational structure

- This statement is for Dialog Pty Ltd ACN 010 089 175 and its controlled entities, being:
 - (a) Access Testing Pty Ltd – ACN 069 942 552 (trading as Access HQ)
 - (b) Catapult BI Pty Ltd – ACN 127 218 482 (trading as CatapultBI)
 - (c) Ice Media Pty Ltd – ACN 065 027 956 (trading as ICEMEDIA)





- (d) Innodev Pty Ltd – ACN 127 666 031 (trading as innodev)
- (e) Scrum Australia Pty Ltd – ACN 160 811 290 (trading as Scum Australia)



- Company Structure



- Dialog Information Technology that employs professional skilled consultants to provide information technology services to corporate and government organisations in a variety of industries; AccessHQ provides professional testing specialists and services major government and corporate clients in high value, long term business relationships; CatapultBI, Australia's leading business insights and data management consultancy; ICEMEDIA, one of Australia's leading and most innovative multimedia companies; Innodev, providing a broad range of management and information technology consulting services to major corporate and government clients; and Scrum, an events company. which manages the Scrum Australia Conference for the Scrum Alliance.
- A consultation process with our wholly-owned subsidiary businesses was undertaken to draft this statement. Subsidiaries are controlled by the holding company, Dialog Pty Ltd, and administered under the Group Subsidiary Directorship Policy for the appointment of subsidiary directors.

Our supply chains

Company, trading as:	Operations	Supply Chain
<p>Dialog Information Technology</p> 	<p>Dialog provides professional information technology consulting services in connection with technical projects for our clients. Dialog has a broadly based information technology services capability, which includes consultancy, project management, business analysis, application architecture, application development, systems integration, implementation, training and support services. Dialog works with a range of project management tools, frameworks and methodologies.</p>	<ul style="list-style-type: none"> ○ Professional services consulting and contracting ○ Technology – software implementations and Cloud services ○ Software development and system integrations ○ Sales, training and support services
<p>AccessHQ</p> 	<p>Our expertise and integrated know-how is applied every day by leading companies and organisations to assist our client to gain more from their technology projects. AccessHQ is an independent Australian business and part of the Dialog Group of companies. Through our parent company we have access to a national and international network of experts to help solve your business problems.</p>	<ul style="list-style-type: none"> ○ Professional services consulting and contracting ○ Technology software implementations ○ Quality assurance ○ Testing solutions
<p>CatapultBI</p> 	<p>Catapult BI's business consultants work with our clients to gain a clear understanding of the corporate strategic direction, critical business drivers, the business systems upon which the organisation relies and the available corporate data sets. CatapultBI is part of the Dialog Group of Companies.</p>	<ul style="list-style-type: none"> ○ Professional services consulting and contracting ○ Technology – software data implementations
<p>ICEMEDIA</p> 	<p>For over 28 years, ICEMEDIA has been creating experiences for digital channels. Working with leading government and corporate clients, we design and develop solutions to</p>	<ul style="list-style-type: none"> ○ Professional services consulting and contracting ○ Technology –

	<p>enhance customer experiences and to better achieve business objectives. We work from the inception of a solution at the strategic level right down to design, implementation, training and support. The company is part of the Dialog Group of Companies.</p>	<p>software implementations</p> <ul style="list-style-type: none"> ○ Web development
<p>Innodev</p> 	<p>Innodev provides a broad range of management and information technology consulting services to major corporate and government clients. Innodev's specialist Business Agility Coaching and Consulting team uses Agile methods and practices to help organisations transform and modernise their business operations. Innodev is part of the Dialog Group of Companies.</p>	<ul style="list-style-type: none"> ○ Digital Solution ○ Consultancy Services ○ Managed Services ○ Business Analysis and Process Design Services ○ Business Intelligence
<p>Scrum Australia</p> 	<p>Formed in 2012, Scrum Australia organises conference for the Australian Scrum Community. The company is part of the Dialog Group of Companies.</p>	<ul style="list-style-type: none"> ○ Events management

- Our supply chains reflect the service-based nature of our operation. The supply chain relationships include suppliers from the following sectors:
 - (a) information, communications, and technology;
 - (b) professional services, consulting and contracting
 - (c) property services (including facilities management, utilities, cleaning, waste management and security);
 - (d) logistics and correspondence;
 - (e) marketing;
 - (f) print and promotional goods and services;
 - (g) office supplies; and
 - (h) events management.

Modern Slavery risks in our supply chains

- We seek to engage suppliers with proven values, ethics and business practices, including those related to modern slavery and broader human rights issues.
- In 2022, almost all of our Tier One suppliers were based in Australia, with the vast majority of our spend occurring in Australia. The type and duration of our commercial relationships with our Tier One suppliers varies significantly. For example, in some cases we have long-term relationships with our contractors and landlords. In contrast, we also have a range of ad hoc relationship with other suppliers such as venue or event providers.
- We recognise that the expenditure from Tier One suppliers may not be an indicator of supply chain risk. This is because we may also be exposed to modern slavery risks through smaller or once-off procurement, or Tier One suppliers indirectly.
- In 2022, we did not identify any modern slavery incidents in our operations.

Modern Slavery risks in our operations

- As an IT consultancy company with a professional workforce, we consider the risk of modern slavery within our direct business operations to be low.
- The potential risks associated with the Group's operations are considered to be low due to the following factors: 1. the continued use of our internal quality management systems and methodologies, 2. strictly operating within the parameters of Government laws and regulations and 3. work with entities required to comply with and report under similar legislation whether overseas or in Australia. In the recruitment and management of our people and their workplace the Group operates within Federal, State and Territory guidelines including FairWork, ATO, Department of Home Affairs, Workplace Gender Equality Agency (WGEA) and SafeWork Australia. Working closely with these governing bodies and our internal systems ensures we are mitigating any risks to our people and our services.
- The Group continues to recognise the possibility there may be areas of low visibility when connecting with our suppliers and, in turn, with their remote connections that may include overseas operations and supply chains.

As acknowledged in our 2021 Statement, we recognised the ongoing impact of COVID-19 is likely to heighten the skill shortage in our operation. In some circumstances, we have allowed our new-recruit to work from their overseas location temporarily as a result of the border closure. Generally, these recruitment processes are for IT professionals which tend to carry low risks. There may be modern slavery risks associated with the goods or services they procure from their own country while working for us especially if they are located in countries with weaker enforcement of labour laws.

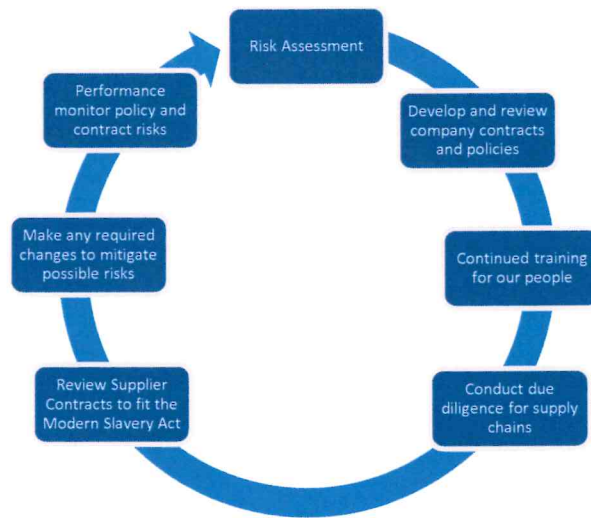
- In 2022, we did not identify any modern slavery incidents in our operations.

Our policies and actions

- DialogGroup is committed to ensuring high standards of environmental, social and governance performance across its supply chain. This commitment is driven by the same principles that guide Dialog's business: Opportunity, Accountability and Integrity.
- Our effective practices and solutions including Quality Management System (complies with ISO 9001:2015), along with the ongoing due diligence of current and future contracts and in association with the Group's SAGE methodology and systems, will ensure the ongoing effectiveness of the Group's modern slavery risks management.
- In 2022, we have reviewed our Supplier Principles to help Dialog uphold its core values with the aim of having supplier relationship that create long-term, sustainable value for our clients, shareholders, community and suppliers.
- As stated in our 2021 Statement, we are continually monitoring the group policies including Code of Conduct, Safe and Fair Workplace, Corporate Social Responsibility and Whistleblowing policies. These policies are provided to all employees during their induction and also available to access from our SharePoint.
- As stated in our Modern Slavery policy, we are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

Risk assessment practices and solutions

- We have in place systems to:
 - (a) identify and assess potential risk areas in our supply chains;
 - (b) mitigate the risk of slavery occurring in our supply chains;
 - (c) monitor potential risk areas in our supply chains; and
 - (d) protect whistleblowers.
- We adopt the following Risk Assessment Methodology to assess, develop and review supplier contracts to ensure a close fit with the requirement of the Modern Slavery Act.



Our effectiveness in combating slavery

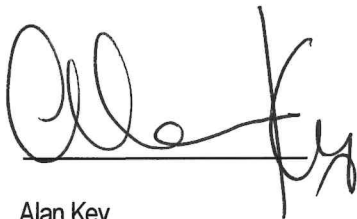
- We recognise that training is the key component of an effective response to modern slavery. That is why we have included the relevant policies in relation to modern slavery and human rights in our induction program.
- We actively engage with our customers by completing the Supplier Assessment Questionnaire and work together to identify possible risks through our supply chains.
- If a case of modern slavery is uncovered at any time during the procurement process, Dialog Group would refer to the Modern Slavery Response Protocol which includes a 3 steps process – record & refer, investigation & action, plan a remedy.
- Consultation was carried out within the Group with respect to their operations and supply chains during the process of gathering information for the 2021 Statement. Each subsidiary was contacted to assess and evaluate its separate operations and supply chains.

Future commitment

- We understand and recognise the importance of combating modern slavery and are committed to the ongoing due diligence review and assessment of any possible risks in our supply chains and operations.
- We are working to continue to strengthen our approach to assessing effectiveness. We believe the core component of an effective response is to be able to accurately identify, understand and respond to our modern slavery risks.

This statement was approved by our Board of Directors on 8 December 2022.

Signed for and on behalf of the Dialog Group of Companies:

Signature: 

Name: Alan Key

Title: Director

Date: 8 December 2022