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Computers Now

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ABN 48 592 886 118

## **MODERN SLAVERY STATEMENT 2021**

### **The Trustee for COMPUTERS NOW UNIT TRUST (CompNow)**

**ABN: 48 592 886 118**

#### **1. 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 refers 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.

## 2. Our Structure, Operations and Supply Chain

### 2.1. Our structure

CompNow is a privately owned company with no parent companies or subsidiaries, regulated by ASIC and is incorporated in Victoria. CompNow is 100% privately owned IT organisation and provides customised procurement, deployment and support plans and services for education, health, government and business enterprises. Founded in Melbourne in 1990, CompNow now has established offices and warehouses in VIC, NSW, QLD, SA & WA and trades Australia wide.

Since 1990, we have grown from a small IT reseller to one of Australia's largest privately-owned IT Service providers and are recognised as having "best of breed" practices and personnel across many specialist IT areas.

CompNow delivers cost effective, customised procurement, deployment and support services for education, government, and business supported by a locally based client engagement and service delivery structure. Our technology delivery encompasses a broad range of ICT solutions from desktop, mobile and server infrastructure through to networks, storage, and security and data management services.

Core competencies include;

- Provisioning of desktop and mobile devices (Windows and Apple) with customised and flexible service options,
- backup and disaster recovery strategies,
- data security,
- mobile device/ end-point deployment and management,
- business process analysis and application automation relating to supply chain and procurement processes

CompNow has delivered successful engagements within the public and private sectors, and currently maintains key strategic relationships with many Tier 1 vendors.

#### 2.1.1. Our corporate values

At CompNow, our corporate values are the behaviours we value most in our team. The Company's commitment to its ethical practices and values fosters a culture to attract the highest calibre employees and shapes and enriches our relationships with each other and our customers.

Our Directors drive culture and accountability and ensure our values are reflected in our day to day operations and activities within the community we work in, our supply chain, partners or our employees.

CompNow's corporate philosophy is articulated as the "CompNow Way," comprised of our Corporate Values and supported by our Code of Conduct.

#### 2.1.2. 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.

## 2.2. 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 on our clients' sites. Once implemented, CompNow also supports and manages the technology that we supply to our clients, both remotely and on-site.

As part of our operations, CompNow facilitates finance for our clients that ranges 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. It takes time to gain certification and qualifications in the various technologies that our vendors provide and being able to add value through our people from an engineering, support or services perspective is critical to our success as a business.

From time-to-time CompNow also engages subcontractors to enhance our capability, particularly for clients who are located in remote places or who require support outside of our standard operating hours.

CompNow's operations also include inhouse software development, supply chain management, marketing, sales, customer support and administrative operations. Our operations are supported by non-manufacturing suppliers that provide services and facility management.

CompNow respects ethical labour practices and will not permit any human slavery or similar abuse, and values staff inclusion and diversity. All employees, directors and contractors and suppliers and volunteers when providing products or services are expected to comply with the obligations of the CompNow Code of Conduct (Code).

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 articulated in these documents.

- CompNow Code of Conduct
- Supplier Code of Conduct
- Human Rights Policy
- Whistle blower policy
- Anti-bribery and Corruption policy

## 2.3. Supply Chain

We partner with market-leading suppliers and vendors who provide the latest technologies, products and services for our customers. CompNow's suppliers and vendors are located both within Australia and offshore, with the majority of their manufacturers operating in Asia. CompNow suppliers include distribution channels and manufacturers of technology who supply us with finished products. Many of the goods we procure have complex supply chains containing multiple suppliers and manufacturers (including from overseas) providing components to produce the end product. CompNow does not manufacture its own goods.

CompNow works with a vast network of suppliers and vendors to maximise our ability to provide the best solutions to our customers. 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 manufacturing suppliers based in Asia Pacific.

CompNow's vendors and suppliers are well-established and provide a level of transparency of their business operations and supply chains towards Modern Slavery. CompNow evaluates its supply

chain to identify any partners and suppliers that pose risks for 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/>

### **2.3.1. Supplier expectations**

If CompNow were to become aware of any form of slavery or human trafficking concerns within our supply chains, we would seek to work with the relevant suppliers to mitigate any risks or issues found. Where a supplier fails to make the required improvements within an agreed timeframe, CompNow reserves its right to deselect the supplier from its supply chains.

## **3. Risks of modern slavery practices in our operations and supply chains**

Understanding where products are sourced and made, the risks inherent across the supply chain operations is an essential part of due diligence under-taken. CompNow's largest suppliers are well-established and provide a level of transparency around efforts to eradicate Modern Slavery from their operations and supply chain. CompNow has initially identified certain risks at indirect levels of its supply chains. These include:

- *Being a reseller of laptops, computers, mobile device technology* – CompNow recognises that these goods are at risk of having been produced through Modern Slavery.
- *Small supply chains* – CompNow recognises many smaller suppliers are not required to account for their practices and therefore not required under legislation to perform due diligence over their own supply chains. Although risks have not yet been identified there is potential for significant risk to be found in smaller suppliers.

## **4. Actions to control and actively manage our risks**

CompNow is focused on increasing transparency across its supply chain and overall business. We are open and transparent about our processes and aim to provide consistent and clear information across our communication channels. CompNow believes that to manage modern slavery, we need to do so in multiple ways to increase awareness and have meaningful safeguards in place to support the management of the risks associated with modern slavery.

### **4.1. Policies and procedures**

CompNow's frameworks, policies and procedures across the organisation communicates our intent, expectations and assists in the management of modern slavery risks. These policies and procedures continue to evolve and capture our progression and inform our stance on modern slavery and human trafficking.

### **4.2. Supplier code of conduct and expectations**

CompNow fosters mutually beneficial parentships with its suppliers and vendors who are aligned with our values and meet our expectations. CompNow has developed a Supplier Code of Conduct to give our suppliers a clear view of our expectations of ethical conduct and our approach to corrective action.

#### 4.3. Due diligence

Regular risk-based assessments to help identify our risk areas and inform our approach to mitigation and improvement. A supplier questionnaire has been developed to obtain information from our top tier suppliers and vendors on how they approach modern slavery in their operations and supply chains which will allow CompNow to better address high risk areas in our supply chains and identify those suppliers who are yet to recognise the importance of mitigating the risk of modern slavery in their operations.

#### 4.4. Whistle blower policy

CompNow's whistle blower policy allows whistle blowers to raise concerns in a confidential manner, and also extends to individuals who wish to report Modern Slavery concerns. These are investigated and addressed as appropriate and accordance with applicable CompNow policies.

#### 4.5. Employee Awareness

A detailed learning module is currently being developed to increase awareness about Modern Slavery risks and how to recognise and report specific concerns.

### 5. Measuring effectiveness and continuous improvement

CompNow are committed to continuous improvement and measuring the effectiveness of our risk mitigation strategies. Actions CompNow are putting in place to measure effectiveness and ensure our actions to reduce the risk of modern slavery in our operations and supply chains include:

- 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
- Continuous audits of our first and second tier suppliers and vendors to ensure compliance to modern slavery laws
- Ongoing review of higher risk suppliers to ascertain if circumstances have changed
- Continue engagement with our employees, external partners and modern slavery and our expectations and zero-tolerance to modern slavery
- Implementation of company-wide training program to ensure employees are aligned and supported in addressing modern slavery risks

The CompNow Modern Slavery Statement is made pursuant to The Modern Slavery Act 2018 (Cth) for the year ending on 31 March 2021.

This statement was approved by the board of trustees for The Trustee for COMPUTERS NOW UNIT TRUST on 30 March 2021.

Robert Ruigrok  
Director and Chief Financial Officer



Signature

Date: 30 March, 2021