

Datacom Anti Modern Slavery Statement RYE 2022

*This statement is made in accordance with the Modern Slavery Act 2018 (Cth) for the year ending on 31 March 2022 ('**RYE 2022**') by **Datacom Australia Holdings Pty Limited** (ABN 45 094 235 373) and its '**Reporting Entities**¹' (jointly '**Datacom**').*

Summary

Datacom takes the issue of modern slavery very seriously. So much so, 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 2022, 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.

The COVID-19 disruptions we experienced did impact on our plans to develop a verification programme with our suppliers, so we will need to focus on that next year, together with commencing the review of existing suppliers.

Actions have we taken in RYE 2022
Embedded our Datacom Code of Conduct and Human Rights Policy
Continued with our modern slavery risk assessment for both existing and new suppliers
For all new suppliers in Australia and New Zealand, implemented our Supplier Code of Conduct and new supplier on-boarding procedures, including a detailed anti-modern slavery questionnaire
Developed and implemented a risk assessment process for all new suppliers
Developed and implement a process for escalating "unsatisfactory" or "high risk" new suppliers to the business for a decision whether to engage with them
Continued implementing anti-modern slavery commitments into our supplier contracts
Implemented a training and compliance programme for the business, including compulsory annual training for all employees

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) and **Datacom Systems Limited** (a New Zealand incorporate company, ABN 84 189 277 546).

Our planned actions for next reporting year (ending 31 March 2023)
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
Continuing to remind people about our policies, including through ongoing compliance training
Continuing our new supplier on-boarding procedures and supplier due diligence, as well as implementing our revised supplier contract terms
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
Designing a programme to monitor and assess compliance within our entire supplier community and address any areas of remediation
Design an ongoing verification programme for our entire supplier community

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. With almost 7,000 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.

Datacom employs over 6,300 people, with around 2,500 in Australia, over 3,600 people in New Zealand, and around 200 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 (Quezon City), 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 approximately 7,000 suppliers 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. We do have blocks of temporary workers from time to time which we use 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. We maintain HR support for the workers and through our network of supervisors and support staff, have reasonable visibility into the well-being and situation of most of these individuals. Our managers within this line of business are aware of the modern slavery risk and are focused on ensuring there is no exploitation.

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 off-shore 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. Whilst progress on this aspect of our business was delayed due to COVID-19 and the inability of senior management to travel to Asia, we will continue to work with these teams to assess these businesses in more detail.

To embed ongoing monitoring and vigilance, Datacom's anti-modern slavery programme will be further rolled out to our business units with additional training to ensure widespread implementation by those businesses as well. This is very much an ongoing "work in progress" for us.

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

We have not seen increased risk of modern slavery in our supply chain due to the COVID-19 disruptions in this reporting year.

The biggest impact to us has been the use of “surge” resourcing in our Australia contact centres (supporting the Australian governments COVID-19 relief efforts) – which was similar to the previous reporting year- where we have had to engage temporary workers through our recruitment and workforce providers. This has meant more temporary workers in our workforce. We are confident that these providers are reputable and have put particular focus around the support and care for our workers during these stressful times.

Another impact of COVID has been the delay in implementing several of our planned initiatives – particularly around our Asian operations, and also the introduction of a verification programme for our supplier base. While this has been disappointing, we have ensured we are looking after our employees in Malaysia, the Philippines and Singapore during these difficult times.

Assessment of our effectiveness

To date, 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.

But we appreciate that our progress has not been as swift as we initially hoped. There is a lot more still to be done, and in the next reporting period we will develop processes for assessing existing supplier risk and measuring and assessing the effectiveness of our modern slavery programme.

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 in time to develop a programme of monitoring and auditing our anti-modern slavery programme, including reviewing selected suppliers.

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.

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.

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 30 June 2022.



Alex Coates – **Director**

DATACOM AUSTRALIA HOLDINGS PTY LIMITED

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



Tony Carter – **Chair**

DATACOM GROUP LIMITED