Interactive®

Modern Slavery Statement June 2024

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1. Introduction

Interactive Pty Ltd (Interactive) is dedicated to upholding human rights and actively works to eliminate modern slavery from our business practices and Supply Chain. We recognize modern slavery as a serious crime and strictly prohibit any form of discrimination, bullying, harassment, involuntary labour, child labour, or underage labour. We hold our suppliers and partners to high standards, expecting them to adhere to both local and international laws, respect workers' rights to association, provide fair and timely compensation that meets basic needs, and refrain from using wage deductions as a disciplinary measure.

This Modern Slavery Statement is issued in accordance with the Commonwealth Modern Slavery Act 2018 and covers the reporting period ending 30 June 2024. Within this document, we outline the structure of our business and Supply Chain, our operational procedures, and our approach to identifying and managing the risk of modern slavery.

This policy is applicable to all individuals and entities involved in Interactive's Supply Chain, including directors, employees, officers, contractors, and any other representatives of Interactive.

2. Our Company

For over three decades, Interactive has been at the forefront of empowering businesses to focus on growth by minimising their Information Technology (IT) concerns. As Australia's largest privately–owned IT enterprise, we stand as the leading independent provider of comprehensive Cloud, Cyber, and Systems solutions.

Our Cloud division offers an array of services including Data Centre Services, Business Continuity Services, and a suite of Cloud and Managed Services. In the realm of Cyber Security, our offerings extend beyond Cyber Risk Consulting and Technical Assurance to encompass round–the–clock Active Defence, Digital Forensics, and Incident Response.

The Systems segment encompasses hardware and systems maintenance, with specialised support for Cisco and NetApp, alongside product sales, professional services, monitoring. Our services are available throughout Australia and New Zealand. Interactive also provides secure disposal and destruction services via EraseIT.

At Interactive, we are driven by our company purpose of 'keeping technology human'. We acknowledge the influence our operations have on our employees and those within our Supply Chain. Our unwavering commitment to fostering a sustainable and diverse environment reflects our dedication to reducing our social and environmental footprint.

3.   Our structure, operations, and Supply Chain

3.1.   Structure & operations

Interactive is an Australian Private Company with reported annual revenue of c.$238 (AUD) million for financial year ending 30 June 2024. With a robust workforce of approximately 630 employees, Interactive operates across 10 sites in Australia, 1 site in New Zealand and teams based in the Philippines. The majority of our workforce are employed full-time, with 6% engaged on a part-time or casual basis. Interactive takes pride in directly recruiting employees and contractors through reputable employment agencies.

The Interactive Group incorporates the two below subsidiaries:

EraseIT: A wholly owned subsidiary of Interactive for over 15 years. EraseIT specialises in secure, certified data erasure of IT assets and the recycling of equipment to minimise electronic waste (e-Waste). EraseIT's team consists of approximately 30 individuals.

QuadIQ Group Pty Ltd and its subsidiaries ("Slipstream Cyber"): A wholly owned subsidiary of Interactive since July 2023. Slipstream Cyber services encompass a 24x7 Security Operations Centre and provides top-tier cyber threat detection and response services. The team consists of approximately 60 individuals.

Both subsidiaries benefit from Interactive's extensive policies, training courses, and onboarding processes, including those related to modern slavery and Supply Chain.

3.2.   Supply Chain

Interactive's Supply Chain is integral to its business operations, encompassing the management of corporate offices, procurement of computer equipment and components, product transportation, and the construction and outfitting of company premises.

The Procurement process at Interactive is categorised into 13 distinct Procurement Categories, engaging over 1,200 active suppliers. A significant majority, 95%, of these suppliers are based in Australia, with the remainder distributed across Denmark, Israel, Singapore, the UK, and the USA. In the Systems and Cloud division, electronic components are sourced either directly from manufacturers or through Distributors or alternatively Brokers connected to a global network. Distributors are typically Vendor Channel Partners, whereas the Brokers are licensed, ensuring the authenticity of the electronic equipment and hardware procured from reputable suppliers such as Cisco, IBM, Dell, and HP.

The construction and maintenance of Business Continuity suites and Data Centres necessitate a Supply Chain that also taps into the property and construction sector. Here, the goal is to cultivate long-term partnerships with established, preferred suppliers all of which are managed on-shore.

Regarding Interactive's subsidiaries:
- EraseIT relies on three principal suppliers: two freight companies and one e-Waste supplier, to support its operations.

- Slipstream Cyber's suppliers are predominantly reputable global Software as a Service providers.

4.   Risks of modern slavery practices in our operations and Supply Chain

Interactive undertook a comprehensive risk assessment to ascertain the extent and specific areas of risk within our Supply Chain and operational framework. Consequently, the modern slavery risk rating for our procurement not only reflects the baseline risk associated with first-tier suppliers but also provides insights to the modern slavery risks posed by second and third-tier suppliers upstream. Our analysis of the 13 Procurement Categories scrutinised potential risks associated with child labour, forced labour, wage fairness, excessive working hours, exploitation of migrant Labor, freedom of association, gender equality, legal frameworks, and corruption. The risk level for each category may escalate with increased spending and is influenced by the inherent risks associated with the industries of our suppliers.

Interactive's Supply Chain complexity, length, and nature inherently present the potential for modern slavery risks. The most significant risks are associated with the procurement of products or services involving manufacturing, high-risk materials, or low-skilled labour. The Procurement Categories with the highest risk include computer equipment, electrical machinery, merchandise, and office furniture. Additionally, service Procurement Categories such as construction work, cleaning, catering, and business services, particularly those that are offshored or employ visa holders and short-term staff, also present a heightened risk.

Interactive incorporates a Modern Slavery Questionnaire within our onboarding process for new suppliers. The Risk and Compliance team reviews the responses to ensure compliance with the Commonwealth Modern Slavery Act 2018 and to identify any potential modern slavery risks. Each supplier is assigned a risk rating based on this evaluation, which dictates the frequency of Interactive's subsequent engagements with the supplier for ongoing modern slavery risk assessments.

Review of Interactive's business operations and Supply Chain has determined that Interactive does not actively contribute to or cause modern slavery risks. Although there is no direct evidence linking Interactive to modern slavery through our Supply Chain, the possibility of such practices within the

broader Supply Chain may exist. Interactive is committed to ensure the elimination of modern slavery practices within our Supply Chain.

4.1.   Prioritising areas of risk for future focus

Interactive's risk assessment and mapping of operations and supply chains have enhanced our comprehension of first tier suppliers and areas at risk of modern slavery. We conduct an annual review of this risk assessment and the ratings assigned to suppliers. Utilising a defined set of criteria, we prioritize the monitoring of risks within our Supply Chain, ensuring consistency and replicability in subsequent years.

Our criteria for prioritising Procurement Categories and suppliers are as follows:

- Risk Level: Assessing the probability of Interactive's involvement with modern slavery through its operations or Supply Chain.
- Expenditure: Evaluating the annual financial commitment Interactive makes towards a supplier or procurement category.
- Control**:** Gauging the extent of direct influence, typically over categories or directly with suppliers, through contractual agreements and proportion of business expenditure.
- Influence: Determining the capacity to incentivise suppliers or foster close collaboration, considering long–term or future business prospects, reputational benefits, and capacity building initiatives

Interactive identified the following priority areas:

- Sourcing of furniture for fit outs
- Outsourced financial and other business services by third parties
- Australian labour use for construction
- Onsite labour from contracted services such as cleaning and security
- Merchandise Supply Chain

The areas found to be of elevated risk and spend level, but with relatively low levels of influence are:

- Supply Chain risk in electronics hardware or parts
- Supply Chain risk in construction materials and products

5. How we address our risks

5.1. Actions taken to address our risks

5.1.1 Modern Slavery Action Plan

Interactive has established an Action Plan for preventing, mitigating, and detecting modern slavery. The roadmap sets out actions that spans governance, risk management and due diligence, training and education, supplier engagement, partnerships, evaluation, and reporting.

5.1.2 Code of Conduct and Policies

Interactive's Environmental and Sustainability Policy, aligned with our overarching Sustainability Strategy, is informed by the United Nations Sustainable Development Goals and our commitment to 'keep technology human'. It emphasises Supply Chain management as a focal area over the next three to five years, complementing our efforts towards gender equality and reducing inequalities. Interactive upholds an internal Code of Conduct Policy for employees and a Supplier and Partner Code of Conduct for our business partners. These codes establish the fundamental expectations for our staff, suppliers, and partners to honour and advocate for the human rights of all individuals within the Supply Chain. The provisions encompass a range of human rights issues, including child and forced labour, health and safety, environmental stewardship, and ethical conduct, which extends to responsible sourcing practices.

All new employees at Interactive and its subsidiaries are mandated to review and acknowledge the Interactive Code of Conduct and relevant policies pertaining to their roles. All staff members have continuous access to Interactive's complete suite of policies via our Intranet, which undergoes an annual review process to ensure currency and relevance.

5.1.3   Supplier screening and approval process

Interactive has established a comprehensive onboarding process for new suppliers, designed to mitigate various risks, including those associated with modern slavery. The onboarding process encompasses the following steps:

- New supplier questionnaire – including Modern Slavery Questionnaire
- Governing approvals for engagement
- Non–Disclosure Agreement (NDA)
- Master Procurement Agreement (MPA)
- Statement of Work
- Supplier and Partner Code of Conduct

Interactive employs a rigorous evaluation process to ascertain the risk rating for new suppliers concerning Modern Slavery. The supplier questionnaire meticulously examines the principal factors contributing to risk, including geographical locations, subcontracting practices, utilisation of overseas labour, reliance on labour hire, and external recruitment strategies. Suppliers deemed to be at elevated risk are queried about their measures to evaluate and mitigate human rights issues and modern slavery risks, as well as their depth of knowledge regarding their own supply chains. The responses garnered from the questionnaire are instrumental in identifying suppliers that warrant additional scrutiny and thorough due diligence.

5.1.4   FairCall Whistle–blower

Interactive subscribes to an independent Whistle–blower service which provides a hotline by toll–free telephone number, web–based access, post, and fax, for employees and third parties to make confidential reports. We understand the importance of having a Whistle–blower service that is accessible, trusted, and anonymous so that modern slavery or human rights abuses can be uncovered and remediated. We promote this to suppliers during the onboarding process and during regular supplier engagement, encouraging open communication. We remind staff of the

Whistle–blower process in our annual Code of Conduct training and provide the details on both our internal intranet and external compliance website.

5.1.5 Remediation Framework

Interactive is committed to taking responsibility for incidents and remediating the impacts of modern slavery that arise as a consequence of its business operations. We have implemented a Remediation Framework, aligning to The United Nations Guiding Principles on Business and Human Rights, to ensure our personnel are equipped to address modern slavery incidents effectively and knowledgeably.

The Remediation Framework outlines a sequence of actions aimed at protecting the victim, which includes collecting information, implementing corrective measures, making decisions regarding referrals to national authorities or specialist organisations, facilitating rehabilitation, providing restitution, and conducting evaluations.

5.1.6 Training

Interactive is dedicated to ensuring that all relevant staff, including those of subsidiaries, are well-informed and trained annually on Modern Slavery. This training encompasses an understanding of what Modern Slavery entails and how to identify its risks both internally and within the Supply Chain. All staff have to review and sign off on policies relevant to their role and undergo Code of Conduct training annually. We also provide annual health and safety training which includes raising awareness and how to use our Whistle–blower Service.

6. Assessing effectiveness

6.1. Risk Management

Interactive's risk management and reporting process, led by the Risk & Compliance Department, is a robust framework that addresses business risks, including potential modern slavery and human rights

risks. All identified risks are documented in an online risk management application, which not only tracks risks but also monitors the progress of risk treatment plans. The Risk and Compliance Team oversees these risks, providing comprehensive reports to the Executive Leadership Team and the Interactive Board. The efficacy of this risk process and risk management practices is independently verified during ISO 9001 Quality and Service Organisation Controls (SOC) audits, ensuring the highest standards of compliance and governance.

The evaluation of the effectiveness of actions will include an annual review of:

- The risk register and modern slavery risk assessment to identify any changes over time, such as risks relating to new products or suppliers.
- The responses to our Modern Slavery Supplier Questionnaire and steps taken to scrutinise elevated risk suppliers.
- The number and nature of reports submitted using the FairCall Whistle-blower service.

Any corrective actions or remediation that has taken place as per the Remediation Framework to ensure the learnings can be used in the prevention of future cases. If no cases of modern slavery are found, we acknowledge that this does not mean that we do not have modern slavery in our operations or Supply Chain and continued diligence is required.

7.   Interactive Subsidiaries

7.1.   How we have consulted with EraseIT and Slipstream Cyber

- EraseIT, has a simple Supply Chain with three tier one suppliers.
- Slipstream Cyber's tier one Supply Chain mainly consists of reputable Software as a Service (SaaS) providers.

During the reporting period, we have ensured EraseIT and Slipstream Cyber were consulted, informed, and understand modern slavery and the risks in their Supply Chain by:

- Discussing the Commonwealth Modern Slavery Act 2018 and its relevance to both EraseIT and Slipstream Cyber
- Discussing why we are required to publish a Modern Slavery Statement
- Consulting with the operations team and management teams' modern slavery risks currently present or which may present at a later date and what these risks mean to both Interactive and to Erase IT
- What to do if a modern slavery risk is identified
- Providing an overview of the Whistle-blower Process and how to access the service
- Providing training on what is modern slavery, how to identify risks and reporting potential cases of modern slavery
- Annual process review and continuous improvement

8.   Additional information

For more information contact:

Risk and Compliance Team – compliance@interactive.com.au

https://www.interactive.com.au/compliance/.

This statement is approved by the Board of Interactive Pty. Ltd.

Signed,

Signed by:

Brendan Fleiter

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Brendan Fleiter

Executive Chairman