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# **CEO Commentary**

We had another year with difficult market conditions in 2021. Despite this, with our preparation and lessons learnt from 2020, we were still able to achieve outstanding results. With strong financial performance and the acquisition of Exeed, we have significantly bolstered our operations.

In the midst of this activity and difficulty, we remain committed to the ongoing improvement of our modern slavery action plan to address and diminish modern slavery risk in our business particularly as we were encouraged by positive feedback on our efforts in the prior reporting year. We believe continued improvement and a commitment to be the best at what we do is critical to our success and the ongoing confidence of our investors and stakeholders.

I am pleased to present our Modern Slavery Statement which represents the efforts put forth by our management team and our people as a whole to identify, analyse and mitigate modern slavery risk within our operations and our supply chains.

With the acquisition and integration of Exeed, we felt a distinct need to revaluate our operations and supply chains. We again engaged with specialists and technology providers in the space to comprehensively evaluate our current risk profile in the wake of our recent acquisitions and undertake the necessary actions to put measures in place to mitigate and remediate such risks. We undertook an evaluation of the steps we have put in place, outlined new initiatives to further improve our performance and will continue to drive our strategy forward for a sustainable and ethical future for our business.

The continued impact of COVID-19 cannot be dismissed but our COVID response plan has been embedded into our operations and we have managed to excel in this period by maintaining our actions to minimise the pandemic's effect on our business.

This statement will go over the impressive work undertaken by our tremendous group of people over the reporting period to advance our action plan as we continue to combat the risk of modern slavery to our company.

**David Dicker** 

**Chairman and Chief Executive Officer** 

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This statement was approved by the Board of Directors of Dicker Data Limited



## 2021 in review

#### **Entities and Structure**

Responsive to Mandatory Criteria 1 and 2

- Identified reporting entities
- Described Dicker Data's structure, operations and supply chains post-acquisition of Exeed, as reflected on pages 6-8 of this Modern Slavery Statement

#### **Policies and Protocols**

Responsive to Mandatory Criteria 3 and 4

- Reviewed the Code of Business Conduct and Corporate Governance Statement in terms of modern slavery risks and ongoing compliance with modern slavery laws
- · Extended policies and protocols to newly acquired Exeed entities

### **Due Diligence**

Responsive to Mandatory Criteria 3 and 4

- Categorised Dicker Data's first tier suppliers on an industry and geographic basis to drive risk assessment
- Re-mapped and re-assessed our comprehensive supply chain using the categorised first tier data, with the assistance of FairSupply, a third-party technology provider
- Performed an in-depth individual supplier analysis of 20 suppliers that were identified as having the highest number of probable slaves in their supply chain and the top five industries that pose the greatest risk of modern slavery

#### **Grievances and Remediation**

Responsive to Mandatory Criteria 3 and 4

- Extended existing mechanisms for reporting business misconduct including modern slavery to newly acquired Exeed entities
- Used internal communication initiatives to reinforce staff awareness of reporting mechanisms for modern slavery concerns

## **Training and Education**

Responsive to Mandatory Criteria 3 and 4

- Conducted internal training on modern slavery for our executive team in a session tailored to Dicker Data, its industry and its modern slavery risk assessment
- Developed online education modules for suppliers and staff, particularly for later procurement employee onboarding



#### COVID-19

Responsive to Mandatory Criteria 3, 4 and 7

- Maintained protocols and practices to protect the health and wellbeing of our workforce during the COVID-19 pandemic
- Maintained the continuity of first tier supplier relationships to mitigate the impact of COVID-19 on lower tiers of the supply chain and related risks of modern slavery
- Increased inventory holdings to ensure ongoing operations during global supply chain issues.

### **Assessing Effectiveness**

Responsive to Mandatory Criteria 5

- Reviewed processes to be continued on an annual and ongoing basis to measure modern slavery risk in our supply chain
- Performed qualitative analysis of efforts by expanded set of first tier suppliers to mitigate modern slavery against efforts noted in the first year of reporting.
- Performed quantitative analysis of results against benchmarks established in the first year of reporting with technology partner, FairSupply Analytics.
- Generally noted improved performance by first tier suppliers in their modern slavery mitigation and reduced number of theoretical slaves within our supply chain.

#### **Collaborative Efforts**

Responsive to Mandatory Criteria 6 and 7

• Engaged with key operational personnel across corporate structure, including newly acquired entities, to assess, identify and mitigate modern slavery risk.



## Who we are

Dicker Data (ASX:DDR) is an Australian-owned and operated, ASX-listed distributor of IT hardware, software, cloud and emerging technology solutions for corporate and commercial ANZ market with over 43 years of experience. For FY21, our principal activities were the wholesale distribution of computer hardware, software and related products. In 2021, Dicker Data acquired Exeed, the second largest IT distributor in the New Zealand market. They are a leading distributor of key technology brands which has a focus on both commercial and retail sectors.

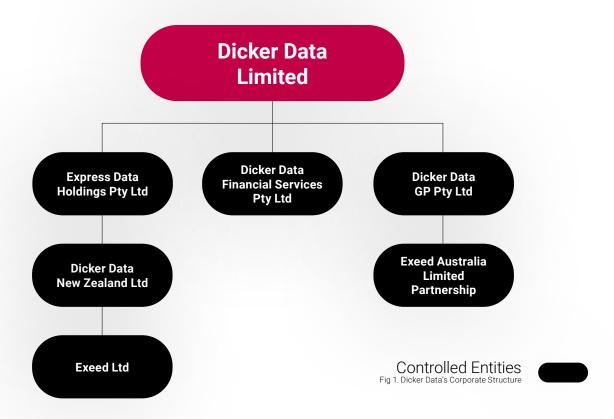
With over 8,200 active, registered resellers in our partner base, we distribute a wide portfolio of products from world-leading technology vendors including Apple, Cisco, Citrix, Dell, Hewlett Packard Enterprise, HP, Lenovo, Microsoft and other widely known technology brands. The company has proven strategies and processes in place to efficiently on-board new brands and to begin delivering a return on investment quickly. In 2021, we added nine new vendors and consolidated our relationships with existing vendors. A sampling of the key brands in our vendor base is provided below:



We are a vital link in the value-added technology supply chain that supports over 8,200 IT reseller partners to design, configure, deliver, and deploy the technology that we provide. Our resellers operate within Australia and New Zealand and as such are able to avoid the pitfalls of modern slavery in their respective operations due to the strong legislative framework of those jurisdictions.



## **Corporate Structure**



## **Operations**

Dicker Data Ltd is a reporting entity under s 5(1) of the Modern Slavery Act 2018 (Cth) (the Act). This statement is presented on a consolidated basis and Dicker Data Limited is reporting on behalf of the consolidated group.

We lease seven properties in Australia and New Zealand and have recently moved into our new headquarters located at 238 Captain Cook Drive, Kurnell 2231 which is owned by the Company.



#### **Workforce**

As at the end of FY21, we had a workforce of approximately 676 people.

Department	Number of staff	Permanent	Casual
Australia			
Sales and Product Management	367	353	14
IT & Marketing	39	30	9
Finance	49	46	3
Warehouse	46	40	6
AU TOTAL	501	469	32
New Zealand			
Sales and Product Management	122	121	1
IT & Marketing	7	7	0
Finance	11	11	0
Warehouse	35	21	14
NZ TOTAL	175	160	15

The significant increase in our workforce can mainly be attributable to the acquisition of Exeed with a workforce of approximately 119 staff, with 95 in New Zealand and 24 in Australia. Our workforce includes sales, presales, product, IT, finance, warehouse and marketing teams that are mostly comprised of experienced and highly skilled specialists which in turn lowers the risk of modern slavery risk occurring in our operations. Our team is a trained, professional workforce that is subject to the strong legislative frameworks of Australia and New Zealand. Almost 85% of our workforce indicated that they are proud to work for Dicker Data in our annual staff survey.

Our robust human resources department and the strong oversight provided by the Executive team allows us to screen, onboard and oversee employees in a manner that prevents modern slavery. Employees are required to adhere strictly to our Code of Business Conduct, with yearly training and testing on its contents, as well as our other standards of practice and procedures to ensure that they, and Dicker Data, act in an ethical and professional manner.

We provide employees with access to our grievance mechanisms where they may raise complaints or concerns (anonymously if desired) with the company's practices and access solutions for their resolution.



# Identifying risks of modern slavery practices

Dicker Data, in conjunction with FairSupply, reviewed and updated our in-depth analysis of our supply chain, going beyond our first-tier suppliers and reviewing the probable risk of modern slavery occurring in our comprehensive supply chain.

We use the term 'comprehensive supply chain' to capture the idea of addressing modern slavery risk in a holistic manner, beginning from our direct relationship with suppliers all the way to the source of their raw inputs.

## Methodology

FairSupply utilises proprietary technology to link global trade flow data with Dicker Data's supplier spend data through multi-regional input-output tables (IOTs) to map the supply chain in a comprehensive manner to the tenth tier. These IOTs help FairSupply identify the inputs required from different industries in different countries around the world to produce the demand represented by the first tier spend data and then maps out the value spent at each tier, industry, and country to the tenth tier. This provides Dicker Data with data beyond our direct suppliers to identify in which tier the risk most greatly presents itself and the percentage of our spend represented at that level. This helps us to determine if we are potentially causing, contributing to, or are directly linked to the relevant modern slavery risk and determine our leverage to direct, negotiate, or question purchasing decisions further down the supply chains to lessen that risk.

The initial step of our analysis involved us categorising our first-tier suppliers by both their industry and country to assess the industry and geographic risk posed by our suppliers. The entire set of spend items was allocated an industry or industries and a country and then aggregated at the industry and country level to perform the analysis.

A key metric derived from FairSupply's mapping exercise is the number of theoretical slaves estimated to exist within a supplier's industry and the region in which it operates.

The first tier spend data categorised by Dicker Data and provided to FairSupply did not include the spend data of the newly acquired Exeed entities. Rather, as FY22 will be the first reporting period in which the Exeed entities will be members of the consolidated group for the full year, the first tier spend data attributable to the Exeed entities will be included in the exercise when performed for the FY22 reporting period. The analysis of the first tier suppliers and the mapped comprehensive supply chain for the FY21 reporting period which follows, therefore, excludes those attributable to the newly acquired Exeed entities.

#### **Overview**

Of the 120 unique suppliers, 76 were located in Australia and New Zealand, indicating a low level of geographical risk of modern slavery occurring in the majority of our suppliers with their direct operations due to the strong regulatory framework of Australia and New Zealand. Other key regions that our suppliers are located in are the United States of America, Singapore, Taiwan and Ireland.

The largest proportion of our spend is to Australian suppliers representing 86% of our total supplier spend data with the second largest region being Singapore representing 5%. The majority of our spend were directed to computer and computer peripherals, electronic equipment, and computer & technical services.

These industries can incur modern slavery risk through the manufacturing of components and the sourcing of inputs for their fabrication. Forced labour, debt bondage and child labour are some of the forms of modern slavery that can arise when engaging with these industries due to poor oversight in manufacturing plants and the sourcing of certain minerals for the production of key components.



In terms of regional risk, the majority of our risk can be attributed to suppliers located in or sourcing from the Asia-Pacific region namely China and Indonesia in tiers beyond direct suppliers. These regions have been identified by international organisations and non-government organisations as having an elevated risk of labour exploitation. However, regional risk is limited in scope, and we undertook further analysis of risk in terms of both geography and industry below.

Dicker Data conducted two further analyses on the modern slavery risk within our supply chains as well as the actions that our suppliers are taking in regards to their respective operations and supply chains.

## In-depth Analysis - Top 20 Suppliers

Our first-tier supplier analysis yielded positive results with a low number of theoretical slaves. However, due to the nature of the products that we distribute, there is an elevated risk of modern slavery occurring deeper in our comprehensive supply chain. Whilst we appreciate the difficulty in exerting our influence throughout the entirety of our comprehensive supply chain, we endeavoured to identify and analyse the issue of modern slavery beyond our first tier.

In this regard, we conducted a more thorough analysis on certain subsets of data, the first of which was a deep dive analysis into our top 20 suppliers based on the highest number of theoretical slaves within our supply chain that were attributable to that supplier. The risks identified stemmed primarily from the potential use of forced labour, the sourcing of conflict minerals, the presence of migrant labour, the use of restricted chemicals and poor working conditions in manufacturing in their respective supply chains.

Measure Implemented	% of the top 20 suppliers (FY20)	% of the top 20 suppliers (FY21)
Code of Business Conduct	89%	100%
Supplier Code of Conduct	67%	95%
Slavery Statement	61%	90%
Human Rights Policy	67%	70%
Conflict Minerals Policy	72%	80%
Report Suppliers to Hotline	33%	80%
Responsible Business Alliance Membership	89%	70%
Signatory to UN Global Compact	44%	45%
Due Diligence Program	83%	75%
Supplier Self-Assessment	89%	75%
Audit of Direct Suppliers	94%	90%
Audit of Additional Tiers of Suppliers	17%	15%

Table 1. Measures implemented by our top 18

This in-depth review was an expansion of our original review conducted in FY20 from 18 to 20 suppliers, and allowed us to track year-on-year changes with key suppliers that remained in the top 20 despite shifts in spend amounts and attributable risk of modern slavery in their operations and supply chains.

The 20 suppliers selected represented 85% of the theoretical number of slaves in our comprehensive supply chain. The top 20 suppliers consisted of both suppliers that were captured in our analysis in the prior reporting period as well as some new entities. Collectively, the top 20 suppliers expanded and improved their response to modern slavery. Most notably, there was a dramatic increase in the number of entities that had published a modern slavery statement, outlining their actions in regard to their modern slavery risk.

The results of this analysis indicate positive signs that our suppliers are enacting measures that generally exceed



their obligations under applicable modern slavery laws noting a number of them are multinationals and are subject to modern slavery laws in other jurisdictions. In general, they are taking the appropriate steps to help stem the presence of modern slavery within their supply chains and despite our relatively minimal influence upon these large-cap suppliers, we believe they are appropriately educated and capable of enacting widespread change to their supply chain.

A comparative analysis against the prior reporting period's data for the top 20 suppliers in terms of number of theoretical slaves demonstrates an improvement. When measured by every million dollars of output in the industry to allow for year-on-year comparisons despite changes in actual spend amounts, the number of theoretical slaves has decreased by 22.2% from FY20. The quantitative results of our analysis aligns with the qualitative results we have gotten from our desktop due diligence exercise and demonstrates ongoing improvements by our suppliers.

## In-depth Analysis - Top 5 Industries

In addition to this analysis, we also undertook analysis of the top five industries that our suppliers operate in that are most at-risk of modern slavery. An intersectional analysis of our modern slavery risk was conducted by identifying both the relevant industry and the geographic location of our suppliers to identify key industries in certain regions in order to provide a comprehensive understanding of risk and specific target areas for our engagement.

The top five industries that are present a heightened risk profile are:

- 30.6% of slavery linked to our spend is attributed to the Electronic equipment industry in Australia;
- 20.34% of slavery linked to our spend is attributed to electrical equipment in Australia;
- 18.24% of slavery linked to our spend is attributed to computer and technical services in Australia;
- **6.92%** of slavery linked to our spend is attributed to computers and computing peripheral equipment in Singapore; and
- **2.4%** of slavery linked to our spend is attributed to computerised data processing and commercial research in Israel.

Our direct suppliers in the above industries are largely based in Australia which provides a strong legislative framework which diminishes the risk of modern slavery occurring in our direct supplier's operations. Despite this, modern slavery risk is incurred through the nature of the industries in which our suppliers operate in that the sourcing of raw materials and components to manufacture the products that we source are subject to risk of forced labour, debt bondage and child labour. Electrical and electronic equipment, computer equipment and data processing require inputs that carry a heightened risk of modern slavery due to the sourcing of key minerals and materials such as cobalt, tungsten, tin, gold, steel, and other resources that are commonly referred to as "conflict resources".

The figures above demonstrates that the parts of our comprehensive supply that attract the greatest risk of modern slavery occur deeper in our tier list and indicates that Dicker Data, rather than causing or contributing to modern slavery, is instead merely linked to modern slavery.

This further analysis revealed the risk of probable slaves was in greatest portion in the lowest tiers of their supply chains where very little of Dicker Data's spend was represented and therefore our power to exert influence is, in turn, limited. The greatest portion of Dicker Data's spend was reflected in the first three tiers of that supply chain and where only a small fraction of the probable modern slaves in the comprehensive supply chain have been assessed to reside.

Given these results from our in-depth analysis, we believe that our suppliers are taking the appropriate steps to reduce the risk of modern slavery in their supply chains and do not believe further remediation or action in respect of these suppliers is required at this time.



The results of the above analysis demonstrate that a large proportion of our modern slavery risk is characteristic of the industries in which we operate and remain fairly consistent from year to year. Despite this, the analysis of the industries that we procure goods and services from when read with our in-depth analysis of our top 20 suppliers indicates an increased proactivity in response to their modern slavery risk factors. The year-on-year improvement in our top 20 suppliers reported responses to modern slavery risk, combined with our lowered level of theorized slaves in our second and third tiers of our supply chain, illustrate a decreased level of modern slavery risk.

## Actions taken to address risks

#### **Policies and Protocols**

A major factor in our modern slavery strategy is our strong corporate governance and management oversight, most readily evidenced by the policies and protocols with which our employees are required to comply. These policies and protocols help us embed our anti-slavery principles in our company and ensure we carry out our mission to mitigate modern slavery in a consistent manner across our operations and supply chains.

Policy	Date of Revision/Review
Corporate Governance Statement	28 February 2022
Audit & Risk Management Committee Charter	17 December 2021
Code of Business Conduct	17 December 2021
Whistleblower Policy	17 December 2021

We conduct yearly reviews of our key policies and protocols with our management team.

## **Operations**

#### **Corporate Governance Statement**

Dicker Data's Corporate Governance Statement provides our principal corporate governance practices in place for the financial year. We seek to maintain high standards of corporate governance to maximise shareholder value through strategic planning, risk management, transparency, and corporate responsibility.

In our latest Corporate Governance Statement covering the reporting period, we discuss practices and processes we have in place to mitigate salient human rights and labour risks, particularly those with respect to modern slavery. We detail our supplier analyses and our commitment to the United Nations' Universal Declaration of Human Rights and the International Labour Organizations Fundamental Conventions.

#### **Audit & Risk Management Committee Charter**

The Audit and Risk Management Committee assists the Board with carrying out its various reporting responsibilities and provide oversight of Dicker Data's integrity, risk profile and ensuring that Dicker Data has the relevant framework to address any forms of risk.



This includes any social sustainability risks including modern slavery and set out the recommended steps to address such risk in their recommendations to the Board.

#### **Code of Business Conduct**

Dicker Data's Code of Business Conduct sets out the values, commitments and ethical standards that we expect in our business and from our people, taking into account our obligations to our stakeholders.

Our updated Code of Business Conduct was adopted in December 2020 and further reviewed in December 2021 and reinforces our commitment to mitigating modern slavery by outlining our values and requiring our employees and resellers to abide by this Statement as well as other policies and protocols that deal with the risk of modern slavery. We have also amended our Corporate Governance Statement to refer to this new Code of Business Conduct and codify the inclusion of modern slavery in director and employee expectations for ethical behaviour.

The Code of Business Conduct affirms our commitment to the UN Universal Declaration of Human Rights and the International Labour Organization's Fundamental Conventions and institutes our affirmations to reduce modern slavery by:

- 1. ensuring all work is freely chosen;
- 2. ensuring the prevention of illegal child labour;
- 3. ensuring fair remuneration;
- 4. ensuring compliance with all laws relating to wages, superannuation and benefits;
- 5. ensuring worker's rights to freedom of association, collective bargaining, peaceful assembly and the freedom of thought, religion, opinion and expression; and
- 6. ensuring the identification and addressing of modern slavery practices and the risk of modern slavery in our operations and supply chains.

Our Code of Business Conduct requires that any actual or suspected modern slavery practices within Dicker Data are to be reported in accordance with whistleblower protections outlined below. It also requires participation in any training sessions offered by Dicker Data to appropriately identify and recognize the risk of modern slavery within our operations and supply chain.

#### **Reseller Terms and Conditions**

A part of Dicker Data's operations is the engagement of IT resellers to enable, educate and inspire them to achieve their full potential. As a partner of Dicker Data, it is important that they share the same values and uphold the same standards we do. As part of our ongoing actions, our Reseller Terms and Conditions will be revised in FY22 to require our resellers to comply with our Code of Business Conduct which in turn includes our stance on modern slavery risk.

#### **Whistleblower Policy**

We believe that every employee should have the chance to speak up anonymously when they see conduct not aligned to our corporate values or not in compliance with applicable law. Our Whistleblower Policy establishes the mechanism by which our staff can freely (and anonymously, if desired) report conduct that goes against the values and standards of Dicker Data. This includes any concerns regarding modern slavery in our operations and supply chain.



## **Supply Chain**

Dicker Data's analysis of our comprehensive supply chain led us to the conclusion that the source of risk of modern slavery exists further down our supply chain inhibiting our ability to mitigate it. Despite this, our in-depth analysis provided valuable insights on how our major suppliers are addressing their risks of modern slavery.

The analysis undertaken by Dicker Data provides significant insight into the industries and geographical regions in which our suppliers conduct their business. We will use the geographical and industry risk profiles generated by the analysis to inform our engagement with suppliers. By profiling potential suppliers, Dicker Data will be able to undertake further in-depth analysis into their supply chains and make assessments on the risk of modern slavery occurring in their operations and supply. This will empower Dicker Data to make informed decisions on new suppliers based upon their modern slavery risk profile.

#### **Education**

In FY21, Dicker Data refreshed internal training on modern slavery for members of our Executive team in sessions tailored to our business, our industry, and the risk of modern slavery. We were able to educate and empower our executive team to appropriately recognise and minimise the risk of modern slavery within our operations and our supply chain.

Dicker Data has engaged a new training provider and intends to create engaging education and training materials for our staff including materials addressing modern slavery over the next reporting period.

### Assessing the effectiveness of our actions

FairSupply Analytics Pty Ltd's (FairSupply) analysis of our operations and supply chains provided a number of metrics by which we will be able to measure our success in mitigating modern slavery in the future. One such metric is the estimated number of theoretical slaves within our supply chain based on FairSupply's mapping of our comprehensive supply chain through to the tenth tier. To allow for comparison year on year despite varying amounts of spend with a supplier (which correlates with varying amounts of output within that supplier's industry), we particularly focused on the metric of theoretical slaves in the supply chain linked to every \$1 million of output. Notably and positively, the results of our supply chain data in FY21 marked a 31.15% decrease from FY20 in the number of theoretical slaves in our comprehensive supply chain.

To complement this quantitative analysis, we conducted a qualitative analysis on an expanded number of suppliers recognised as having an elevated modern slavery risk profile compared to other suppliers. The results of the qualitative analysis were overall positive with a larger proportion of key suppliers undertaking proactive measures to minimise and mitigate their modern slavery risk. An increasing number of these suppliers have put policies and protocols in place to address modern slavery risk. However, this positive development has been slightly offset by a modest decrease in the number of suppliers undertaking advanced measures such as conducting audits of suppliers, whether first tier or further down in the supply chain.

With most of our modern slavery risk being incurred further down the supply chain, Dicker Data's ability to exert influence on larger cap key suppliers such as Dell, Apple, Microsoft and the like is limited. However, analysis of the distribution of our modern slavery risk throughout our supply chain and an in-depth review of our key direct suppliers have yielded positive results with the number of theoretical slaves in tier two and three, previously the major contributor of modern slavery risk in our supply chain, effectively being halved in FY21.

The significant decrease in our modern slavery risk can largely be attributed to the engagement of our suppliers. By engaging in a proactive and productive dialogue with suppliers, Dicker Data was able to effectively educate and empower our partners to actively identify, address and mitigate any potential modern slavery risk in their respective operations and supply chains.



#### **Consultation Process**

We are committed to developing and maintaining a unified response to modern slavery across our entities and recognise that each of our controlled entities has an integral role in ensuring a consistent group-wide approach to the risk of modern slavery.

We undertook consultation with our controlled entities through meetings with our Executive team and key personnel. We have engaged our procurement, sales and vendor relations, supplier relationship managers and our financial services teams in training programs to create a holistic understanding and approach to modern slavery.

The consultation has allowed us to create a group-wide approach to the risk of modern slavery and consisted of the identification of how modern slavery risk arises in our controlled entities, the formation of a unified strategy, the undertaking of the actions outlined above and the review and approval of this Statement.

Dicker Data has disseminated our expectations and efforts to mitigate the presence of modern slavery in our operations and supply chain to our controlled entities and plans to provide group-wide education and training to educate our group on our commitment to reduce modern slavery risk.

With the acquisition of Exeed Group, Dicker Data ensured the dissemination of information relating to our actions relating to modern slavery throughout our larger corporate group through widespread consultative practices. This was to ensure the continuity and consistency of our stance with regards to modern slavery in our operations and supply chains.

# **Covid-19 Impacts**

## **Operations**

The COVID-19 pandemic has posed a significant challenge in maintaining the health and safety of our workers. Deemed as an essential service throughout the pandemic, Dicker Data served an important role in the move to remote working and the uptake of technology in Australia/New Zealand. Our COVID-19 response plan is now deeply embedded into our operations and we will continue to promote the health and safety of our staff.

We made strategic inventory investments that set us apart from the competition as demand for devices and related peripherals surged amid Government enforced lockdowns, spurring the largest work from home movement in history. Dicker Data has remained resilient throughout the pandemic by virtue of our business operations.

To limit the impact of COVID-19 on our operations and to ensure the health and safety of Dicker Data staff during the ongoing pandemic, we have continued to maintain a number of protocols and initiatives in FY21:

- remote-working arrangements for our staff,
- · rigorous safe working conditions for warehouse staff, and
- provision of staff support and moral upkeep in the form of flexible hours, social events and access to training tools and learning courses.

We will continue to review and modify workplace health and safety practices in line with government regulations and external advice.



## **Supply Chain**

Dicker Data recognises the continuing impact that the COVID-19 pandemic may have on heightening the risk of modern slavery and other forms of exploitation within its supply chain. The COVID-19 pandemic poses a difficult obstacle in maintaining strong oversight and increases the risk of modern slavery occurring as companies attempt to minimise costs.

A major effect of the COVID-19 pandemic has been the global chip shortage which has exacerbated supply issues for key components of the goods that we procure from our suppliers. In spite of this, Dicker Data has been able to adapt by forecasting and working closely with our suppliers to secure stock allocations while managing our own customer expectations. This has resulted in consistency with our key suppliers, reducing the risk of potential modern slavery risk being incurred as a result of reduced supplier spend or terminated contracts.

Despite the continuing effects of the pandemic, Dicker Data remained resilient and continued to engage our suppliers and ensure continuity in our supply chain. We responded swiftly to COVID-19 supply chain challenges and capitalised on the changing market dynamics and cemented our position as the leading technology distributor across Australia and New Zealand.

Further, some of our major suppliers were proactive during the pandemic and provided extended terms on their contracts. This has been a major factor in ensuring our supply chain's continuity and resilience during the pandemic which in turn lowers the risk of modern slavery encroaching into our supply chains.

# 2022 and beyond

Dicker Data envisions the continuation of the digital transformation of companies and the growing need for IT distribution as an essential component for businesses. The acceleration of this process in the midst of the COVID-19 pandemic and its continued effects has been a key factor in the continued success of Dicker Data.

Encouraged by this widespread change, Dicker Data intends to meet this growing demand but not at the cost of its integrity.

Dicker Data remains committed to its focus on sustainability, ethical behaviour and corporate social responsibility. As such, we will continue to evolve our modern slavery response as part of our wider initiatives to promote sustainability.

We intend to continue to comprehensively analyse our operations and supply chains with support from industry experts and technology providers to create a holistic and in-depth understanding of our modern slavery risk profile to empower us to take effective steps to mitigate such risks.



# **Document Management**

Revision Date	Nature of Amendments
29 June 2022	Approved by the Board of Dicker Data
01 June 2021	Approved by the Board of Dicker Data