

Datacom Anti Modern Slavery Statement RYE 2024

*This statement is made in accordance with the Modern Slavery Act 2018 (Cth) for the year ending on 31 March 2024 ('**RYE 2024**') by **Datacom Australia Holdings Pty Limited** (ABN 45 094 235 373) and its '**Reporting Entities**¹' (jointly '**Datacom**').*

Summary

This is now our fifth AMS Statement, and in light of the *Report of the Statutory Review of the Modern Slavery Act 2018* released by the Federal Attorney General in Australia in May 2023, we thought it was time to update our AMS Statement to include some of the recommendations from the report which may help the reader better assess our response to modern slavery issues.

Datacom continues to take the issue of modern slavery seriously. We have voluntarily extended our reporting to include all the companies owned and controlled by Datacom Group Limited (our parent company in New Zealand). This also includes our companies that we own in Asia (Malaysia, the Philippines and a non-trading holding company in Singapore).

In this reporting year to 31 March 2024, we have made some good progress, and we believe we now have a solid foundation for addressing the risk of modern slavery within our operations and supply chain going forward.

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), **Datacom Systems Limited** (a New Zealand incorporate company, ABN 84 189 277 546), and **Datacom Solutions Limited** (a New Zealand incorporate company, ABN 81 050 207 455). The New Zealand companies are assessed on an annual basis to determine if they are carrying on business in Australia according to ATO guidelines and are considered a Reporting Entity should they qualify.

Actions taken

Actions we have taken in RYE 2024
<p>Implementing our planned Verification Programme, using our initial Verification List to contact and follow up with our identified suppliers</p> <ul style="list-style-type: none"> • We followed up with our suppliers in relation to modern slavery issues, collated the information and reviewed the perceived underlying risks • We are satisfied that our suppliers on the initial Verification List understand the issue and have committed to programmes to assess and manage the anti-modern slavery risk in their businesses and supply chains.
<p>Conducting due diligence on our large multinational suppliers using publicly available information</p> <ul style="list-style-type: none"> • We undertook a programme for our top 50 suppliers by spend who we had not received any modern slavery information from after several attempts to engage on the topic, and researched public statements including AMS statement filings in Australia • We were satisfied with the results in virtually all cases; one supplier who refused to participate and where we could not find any modern slavery commitments, we have discontinued using.
<p>Continuing compulsory, annual mandatory training for all staff in AMS matters and general compliance initiatives</p> <ul style="list-style-type: none"> • We have had 99.9% completion of the training as at 31 March 2024 • We have established an informative intranet site with all human rights and anti-modern slavery information, presentations and AMS Statements linked to it.
<p>Continuing our supplier on-boarding procedure and supplier due diligence; supplier risk assessments and use of supplier template contracts</p> <ul style="list-style-type: none"> • This has been well-embedded and functions smoothly • It is managed by the Procurement Team, which is a centralised procurement function supporting our business operations for the Datacom Group.
<p>As part of our reassessment of our Asian businesses (Malaysia and the Philippines), reinforcing the importance of AMS compliance and vigilance in our supply chains – this includes training business leaders and making them aware of the potential issues</p> <ul style="list-style-type: none"> • On-site presentation to management in Malaysia and the Philippines on modern slavery issues held in September 2023 • Review with the local teams their internal processes which included annual certifications from key suppliers around human rights and modern slavery issues • Meeting in person with all key suppliers to our Asian businesses and an open discussion on modern slavery risks and issues in September 2023 • Meeting in person with our two key suppliers in Singapore in September 2023 • We are comfortable we are managing the risk of AMS in Asia, and raised awareness of the issue.

Continuing to have visibility of AMS risks and remind Datacom staff of our ongoing programme of work in this area

- In June 2023, we presented to the entire business our AMS Statement for the last Reporting Year and emphasised the importance of continuing to be vigilant about modern slavery risks

In relation to next reporting year, the following are our planned areas of focus:

Our planned actions for next reporting year RYE 2025 (ending 31 March 2024)
Developing a process for assurance around our top 20 suppliers by spend to confirm the statements made around anti-modern slavery are being put into practice
Conducting due diligence on our next 50 top suppliers where they have not responded to AMS questions using publicly available information to assess risk
Continuing compulsory, annual mandatory training for all staff in anti-modern slavery matters and general compliance initiatives
Continuing our supplier on-boarding procedure and supplier due diligence; supplier risk assessments and use of supplier template contracts
Sharing the non-confidential material and our analysis on large multinational vendors with our shareholders for them to use in relation to other companies and investments they are involved in
Continuing to have visibility of anti-modern slavery risks and remind Datacom staff of our ongoing programme of work in this area

Our due diligence system

We adopt a pragmatic due diligence system to help assess and manage modern slavery risks within our business. We focus on:

- **Processes.** We have a robust on-boarding process for all of our suppliers. This gives us the ability to raise not only modern slavery issues, but also other Human Rights issues, ethical approaches to business and security / privacy policies. A register is maintained of all supplier responses. Suppliers on-boarded before the process was in place have now been followed up for information on their anti-modern slavery policies and practices. We are working through any suppliers we have not received a response from.
- **Policies.** All suppliers are subject to our Partner Code of Conduct – available on our website (www.datacom.com). We also consider and review our supplier’s equivalent codes where they have these in place. We also have internal policies

and a Code of Conduct for our staff as discussed below in our “ESG approach” section.

- **Management.** Our People & Culture Team (which includes recruitment) maintain policies, procedures and practices to ensure our internal workforce remains at a low risk of modern slavery. Our Procurement Team manages our and evaluates modern slavery risks with our suppliers. They also hold the register of our suppliers with the information that they have provided.
- **Education.** We continue to include Human Rights and anti-modern slavery issues within our compulsory annual training for all staff. We have a dedicated intranet page with all information and resources in one place for our staff.

To date, we have not identified an actual modern slavery event in our internal operations or supply chain.

The role of anti-modern slavery in our ESG approach

As a private, registered company we do not yet formally report on ESG matters as listed companies do, however on our website are various sustainability, social and community initiatives we have been involved with. These are also well summarised in our Annual Review which we publish each year on our website (see <https://datacom.com/nz/en/about-us/year-in-review/2023>).

Our approach to ESG is very much linked to our core values and purpose to make a difference in people’s lives by turning the imaginable into reality:

The infographic consists of six circular icons arranged in a 2x3 grid, each with a corresponding title and description. The icons are: 1. Two hands holding a globe (Exceed customer expectations), 2. A hand reaching towards a starry sky (Look beyond today), 3. Two people shaking hands (Thrive together), 4. A sailboat on the water (Everyone has a part), 5. A group of people walking (It's the people), 6. A swan (Courage to act).

- Exceed customer expectations**
Our customers' success drives what we do. We walk in their shoes, deliver on our promise and find ways to go above and beyond to help achieve their goals.
- Look beyond today**
Our curiosity drives our continuous evolution. We will encourage freedom to explore, discover and learn. Together, we can create an exciting future.
- Thrive together**
We actively collaborate and think long-term for our customers, our partners and our people.
- Everyone has a part**
We commit to respectfully see the world through other peoples' eyes and encourage their contribution to a better place.
- It's the people**
We are caring and humble and foster an environment where we can bring our best selves to work. Our people make the difference.
- Courage to act**
We are bold with our customers, partners and each other. We show strength and have confidence to speak up and take action.

And this is also reflected in our commitment in respect of anti-modern slavery in our Code of Conduct - which all staff must follow:

Supplier

We will seek mutually beneficial relationships with suppliers and recognise our position as a significant player in the IT sector. As such, we will aim to settle accounts promptly and efficiently. Contracts agreed with suppliers must be honoured.

We are opposed to and will oppose all forms of modern slavery (this includes things like forced or compulsory labour, servitude, prison, trafficking in persons, debt bondage, forced marriage, prison labour and child labour) - both within our operations and our supply chain. We require our suppliers to agree to respect human rights and to take reasonable steps to ensure that they are not complicit in human rights impacts, including modern slavery. We will put in place adequate procedures to manage the risk of modern slavery within our supply chain.

This commitment is also enshrined in our *Datacom Human Rights Policy*, where we commit that we will:

- recognise our responsibility to respect human rights, as described by the UN Guiding Principles on Business and Human Rights
- respect internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (the ILO Declaration)
- oppose all forms of modern slavery practices both within our operations our supply chain
- commit to preventing, detecting and reporting adverse human rights impacts, including modern slavery practices; and
- commit to co-operating with other organisations to reduce the risk of adverse human rights impacts and modern slavery practices.

We also have a public grievance and complaint system, where any employee, contractor, supplier or even a member of the public, may raise an issue or suspected issue in confidence using the *Datacom Group Protected Disclosure ('Whistleblowing') Policy*. 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>).

To date, no complaints concerning modern slavery issues have been received.

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. We have 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. These suppliers are still subject to the same on-boarding procedures and risk assessment.

As of 31 March 2024, Datacom employs around 6,100 people, with around 2,500 in Australia, over 3,300 people in New Zealand, and around 300 in Asia.

Most of Datacom's businesses operate throughout Australia and New Zealand, with some technical and support operations in Malaysia (Kuala Lumpur) and the Philippines (Manila). We have a non-trading holding company for our Asian companies 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 have on-boarded around 3,900 suppliers and partners globally, with around 1,800 active suppliers currently. Our suppliers range from large vertically integrated global providers to small businesses, mainly based in Australia, New Zealand, Asia, the United States of America, the United Kingdom 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 (business and technical consulting, legal and accounting) 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 continue to look at our internal operations and identified that our operations present the same risks we identified in our Anti-Modern Slavery Statement for previous years. We believe we have a low risk of modern slavery within our own workforce.

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 again most are in the higher skilled / wage bracket. 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.

For any international recruited staff, we are an accredited employer in New Zealand, and follow the strict VISA and immigration requirements in each country in which we operate. We have our own internal team looking at immigration issues, recruitment from international markets and security clearances / on-boarding.

We do use some contracted workers for certain customer engagements or staff augmentation assignments for customers. These contracted workers are employed by reputable third-party resource providers who then make their staff members available to us. These individuals tend to be highly skilled and there is a competitive market for their services in the technology sector.

We also have independent contractors in our regular workforce. These are largely individuals with specialised skills or experience and are engaged as professional contractors at market rates.

We also recognise that some of Datacom's operations are in countries outside New Zealand and Australia which may be seen as higher risk geographies (particularly in Asia).

We have over this Reporting Year consolidated reporting lines for our Asian businesses into our Australia and New Zealand operations, so teams are formed across geographies and management has oversight of the whole workforce. As part of that process, roles were looked at and the lines of business reorganised. Significant executive management time was spent with the teams in both Malaysia and the Philippines to set up the new operating model for Asia, and wrap-around People & Culture support was provided.

We are confident that our teams in Asia over which we have much more visibility and are now fully integrated into our operations in Australia and New Zealand, have a low risk of modern slavery.

We continue with our company-wide mandatory training in human rights and anti-modern slavery to all staff in our business (along with other ethical, security, privacy and business practice compliance).

This Reporting Year we included on-ground training and presentations on modern slavery for senior staff in Malaysia and the Philippines.

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, security services, office supplies, waste management, temporary workforce augmentation and marketing products.

We also understand that our suppliers have their own suppliers, which may also connect us to modern slavery risk.

This Reporting Year we focused on trying to better understand this risk beyond our first-tier suppliers, by reviewing our top 50 suppliers' anti-modern slavery statements and policies where we did not have a response to previous requests for information from them.

We were able to identify and source public statements on anti-modern slavery, supply chain compliance and/or workplace policies from virtually all of this supplier group.

We are aware that some of our suppliers that provide IT hardware, for example with rechargeable batteries or use rare-earth materials, will have significant modern slavery risk in their supply chains. This is an area to continue to focus on.

How we deal with risks

We have had in place for over 5 years a robust 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.

As previously mentioned, our *Human Rights Policy and Protected Disclosure Policy* ("Whistleblower Policy") specifically recognise the risk of modern slavery and encourages our employees, contractors, suppliers or any member of the communities in which we work to report and act on any modern slavery concerns. Where concerns are investigated and substantiated, we are committed to taking appropriate action.

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.

To date, we have not had any complaints of modern slavery or identified any actual issues in our supply chain partners.

Assessment of our effectiveness

We believe that we have effectively put in place the foundation to assess and mitigate the risks of modern slavery in our internal operations and supply chain.

We have raised awareness on this important topic and have added modern slavery risks into our annual compulsory training for all staff. We have a well embedded process to assess and work with all new suppliers which has now been in place for over 5 years. We have filled in the previous information gaps with all of our top suppliers (by spend) in relation to how they are dealing with the risk of modern slavery in their operations.

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. Our centralised Procurement Team plays a key role in this, and they are an important part of our anti-modern slavery approach.

We understand this is not a static task but a programme of activity to continue over time. We will seek to continue 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 People & Culture, Risk, Property & Facilities, 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, 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 26 June 2024.



Stacey Tomasoni – Director
DATAKOM AUSTRALIA HOLDINGS PTY LIMITED

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



Tony Carter – **Chair**
DATAKOM GROUP LIMITED