

# ETHAN

## MODERN SLAVERY STATEMENT

**ETHAN GLOBAL**

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# MODERN SLAVERY STATEMENT

## 1. INTRODUCTION AND ABOUT ETHAN

### 1.1. INTRODUCTION

Ethan Global Pty Ltd and its group of companies (set out in **Annexure B**) (**Ethan**) is committed to identifying and combatting Modern Slavery throughout all facets of its business activity. Each company within Ethan uses similar policies, processes and suppliers in carrying out their operations and as such, this statement contains a consolidated description of Ethan's approach to addressing Modern Slavery risks.

Ethan's approach to combatting Modern Slavery includes a commitment to the detection and eradication of coercion, threats, or deception used to force a victim to provide labour or services; human trafficking; debt bondage; and forced marriages. Ethan's efforts in combatting Modern Slavery ensures that it fulfils its responsibilities under the United Nations Guiding Principles on Business and Human Rights, the Modern Slavery Act 2018 (Cth) (**Act**) and protects the integrity of Ethan and the quality of Ethan's supply chains.

This statement communicates and discloses Ethan's structure, operations, supply chain and the policies and procedures Ethan relies upon to assess and address the risk of Modern Slavery for the financial year ending June 2024 (**FY24**). Annexure A outlines how this Statement addresses the mandatory criteria within the Act.

### 1.2. OPERATIONS

Ethan is an Australian-owned information technology and communications service provider with approximately 350 employees. Ethan offers systems integration, technology sourcing, business systems architecture, telecommunications, and information communications technology (ICT) consulting services to customers worldwide.

Ethan's primary operations are conducted within Australia to Australian based customers, and Ethan has offices in most Australian states. Ethan's customers include SMEs, large multinationals and listed entities, and government and public sector organisations.

## 2. ETHAN'S SUPPLY CHAINS

Ethan sources the goods and equipment that it sells to its customers from local distributors who operate in a global supply chain. Ethan's local distributors' suppliers are global ICT hardware vendors, which have production facilities in the United States, Europe, the United Kingdom and Asia (including China and Vietnam). Ethan does not manufacture any goods or equipment itself and functions only as a reseller in this regard.

The IT services Ethan sells is either provided directly by Ethan, or resold from the supplier of such services (e.g. software as a service is resold from the software developer). Aside from Ethan, these services are provided by international organisations, the vast majority of which have an Australian trading entity.

**For Ethan's internal functions, Ethan relies on suppliers from the following areas:**

- **Office facilities** (including, but not limited to, landlords, cleaners and utility providers)
- **Professional services** (including, but not limited to, accountants and auditors, finance, legal, insurance, marketing, and branding)
- **Events** (including, but not limited to, event organisers/providers, venue hire and venue catering)
- **Personnel** (including, but not limited to, recruitment services and independent contractors) and
- **Information Technology** (including, but not limited to, data centre providers; telecommunications and internet providers; and cloud, backup, and disaster recovery services).

## 3. RISKS OF MODERN SLAVERY PRACTICES

### 3.1 RISKS OF MODERN SLAVERY WITHIN ETHAN'S SUPPLY CHAINS

Ethan procures products and materials from supply networks across the world. As with all companies that work with international supply chains, there are risks that its suppliers may operate in jurisdictions which may not have local laws protecting vulnerable groups against forced labour, human trafficking, and other forms of Modern Slavery. This

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is an ongoing risk and Ethan acknowledges that the risk in some geographical areas has been increased in recent years due to a number of factors.

Ethan also sources electronic products through its distributors and suppliers, which may require rare minerals for the equipment to function. These supply chains may involve risk of forced or child labour in certain mining region communities. In respect of goods supplied to Ethan, the majority of its distributors or international suppliers are large entities which also are required to comply with, and report on, Modern Slavery under Australian law, and similar laws in other jurisdictions such as the United Kingdom. In turn, Ethan relies on reports and declarations provided to it by these entities in assessing and controlling any risks of Modern Slavery.

Within Australia, the risk of Modern Slavery practices occurring within Ethan and within its supply chain are remote. Ethan's employees are engaged directly under standard employment terms (which must comply with the National Employment Standards) and all employees are able to terminate their employment upon written notice. All employees are paid at, or above, minimum wage as required under relevant legislation, modern award or enterprise agreement. Ethan has also upgraded our Human Resources Information System to a new Ethan ID platform, which centralises HR functions and provides our employees with greater visibility of details relating to their employment and the company.

For services provided to Ethan from outside Australia (usually specialist programming or consulting skills) the risk of Modern Slavery occurring within Ethan's supply chain are also remote as these service providers are generally entities who are required to report on Modern Slavery practices themselves. Ethan also conducts due diligence on service providers prior to engagement and includes contractual protections for Modern Slavery risks.

Ethan requires our contractors to comply with our Supplier Code of Conduct, and our standard engagement terms, which include warranties in respect of compliance with employment laws, payment of employees and subcontractors, and other anti-Modern Slavery provisions.

## 3.2. RISKS OF MODERN SLAVERY WITHIN ETHAN'S GROUP OF COMPANIES

In FY24, Ethan has not identified any instances of Modern Slavery within its group of companies.

The risk of Modern Slavery practices occurring in our member companies is remote, as Ethan Global Pty Ltd (as the parent company) has full visibility of its owned and/or controlled entities. Ethan also serves as a facilitator of goods and services for its member companies and as such is aware of, and able to control any Modern Slavery risks for its group.

## 3.3. INSTANCES OF MODERN SLAVERY IN FY24

Ethan has not identified or received any information concerning suspected instances of Modern Slavery within its supply chains in FY24.

## 4. ACTIONS ETHAN HAS TAKEN TO ASSESS AND ADDRESS THOSE RISKS

Ethan maintains a Human Rights Policy and a Supplier Code of Conduct. These documents are provided to all suppliers and suppliers must comply with the terms over the course of their business with Ethan. These documents set out Ethan's zero tolerance towards Modern Slavery activities, and require the adoption of fair and ethical workplace practices. In the next reporting period, Ethan will be continuing to undertake a review and update of its policies, procedures and codes.

In FY24 Ethan has sought information from, and posed questions to, each of its suppliers to identify and assess any Modern Slavery risks or instances of Modern Slavery. Ethan has undertaken this process with new suppliers during onboarding, and for its supply chains, which includes monitoring for Modern Slavery (among other) risks that might occur.

Ethan also issued its annual Modern Slavery compliance questionnaire to its major suppliers for FY24. The annual questionnaire requires an authorised officer to respond to a variety of questions about the supplier's practices in relation to their workplace, sourcing of materials and Modern Slavery generally. Ethan has assessed the responses

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provided from each supplier and determined no instances or significant unmitigated risks of Modern Slavery have been disclosed in the responses received.

Ethan also conducts annual training for all its staff in relation to identifying and responding to risks or instances of Modern Slavery, including understanding Ethan's Modern Slavery policies and how to report compliance issues both formally or anonymously using Ethan's Whistleblowing Policy. Ethan ensures that this training is up to date with legislation and guidance in relation to the prevention of Modern Slavery. Staff are also trained in how Ethan responds to identified Modern Slavery issues and its staged remediation process with its suppliers.

With all new contracts, Ethan works to implement anti-Modern Slavery provisions which give Ethan information and audit rights and the right to require a supplier to take certain actions in response to a Modern Slavery incident. Where a supplier cannot, or does not, take such action, Ethan also maintains termination rights to end its relationship with a non-compliant supplier. To date, Ethan has not been required to invoke these clauses.

### 5. ASSESSING THE EFFECTIVENESS OF THOSE ACTIONS

Ethan is constantly reviewing and evaluating the actions taken above. In addition to its internal measures, including training offered to staff, policies, procedures and codes, Ethan has undertaken consultation with a number of its suppliers to educate them on Ethan's Modern Slavery requirements and to encourage the provision and sharing of supply chain information through our policies, procedures and annual questionnaire.

As a result of Ethan's measures, it is assured that the risk of Modern Slavery occurring within Ethan, its group of companies, and its supply chain is minimal.

Ethan will continue to refine its Modern Slavery management strategy over the next reporting period by obtaining relevant information from its supply chains, as well as continuously improving our internal compliance activities.

### 6. GROUP STRUCTURE & CONSULTATION

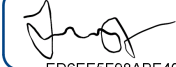
Each entity in Annexure B is a wholly owned subsidiary of Ethan Global Pty Ltd, except for Ethan Indigenous Pty Ltd which is a joint venture between Ethan Global Pty Ltd and David Liddiard Group Pty Ltd. The entities in Annexure B share the same registered company office located at 13-15 Lyonpark Road, Macquarie Park, NSW 2113.

Each of these entities in Annexure B share common directors, and with only a few unique exceptions, all staff are employed by Ethan Global Pty Ltd as the parent company with key staff having provided information in the preparation of this Statement.

### 7. APPROVAL

This Modern Slavery Statement was approved by the Board of Ethan Global Pty Ltd on behalf of each of the Ethan entities in Annexure B.

DocuSigned by:



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Tony Geagea

Chief Executive Officer

Date: 13 December 2024 | 2:00 PM AEDT

MODERN SLAVERY STATEMENT

Annexure A – Modern Slavery Act – Criteria Mapping

Modern Slavery Act Mandatory Criteria	Section reference
Identify each reporting entity covered by this statement	Section 1 and Annexure B.
Describe the structure, operations and supply chains of each reporting entity covered by this statement	Section 2 and Section 6.
Describe the risks of Modern Slavery practices in the operations and supply chains of each reporting entity covered by this statement and any entities owned or controlled by the reporting entity.	Section 3.
Describe the actions taken by the reporting entity covered by this statement to assess and address these risks, including due diligence and remediation processes	Section 4 and 5.
Describe how the reporting entity covered this statement assesses the effectiveness of actions being taken to assess and address Modern Slavery risks	Section 5.

Annexure B – List of Ethan Entities

Name	ACN	Ownership Structure
Ethan Global Pty Ltd	ACN 099 503 456	Parent entity.
Ethan Group Pty Ltd	ACN 139 681 584	Wholly owned subsidiary.
Ethan Capital Pty Ltd	ACN 634 577 067	Wholly owned subsidiary.
Ethan Print Pty Ltd	ACN 641 566 805	Wholly owned subsidiary.
Ethan Indigenous Pty Ltd	ACN 623 264 120	49% owned by Ethan Global Pty Ltd.

