

Synnex Australia Pty Ltd ABN 40 052 285 882

Modern Slavery Statement

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Introduction

This Modern Slavery Statement ("Statement") is made pursuant to the Australia Modern Slavery Act 2018(Cth), for Synnex Australia Pty Ltd ABN 40 052 285 882 ("Synnex"), covering the period from 1 July 2022 to 30 June 2023. The purpose of this Statement is to outline our actions and approaches to ensure Synnex has sound and robust processes in place to detect and minimise the risk of modern slavery in our business operations and supply chain. Synnex acknowledges that slavery and human trafficking occurs in many forms, such as slavery, human trafficking, forced labour, child labour, servitude, forced marriage, debt bondage, and deceptive recruiting for labour or services. Synnex is committed to conducting our business ethically and responsibly through the implementation of policies that align with modern slavery laws. We take ethical sourcing seriously. We embrace the commitment for fair and legitimate business interaction and respect the rights and dignity of all people, including internal employees and people impacted within our supply chain.

Our structure, Operations, and Supply Chain

Synnex is a private company incorporated in Australia in 1997. Since our incorporation, Synnex has grown to become a leading ICT services provider and a trusted partner of choice in Australia. We work with more than 80 vendors to provide an extensive suite of end-to-end hardware, software, cloud solutions and integrated life cycle management services that support SMBs, system integrators, VARs, enterprise resellers, managed and cloud service providers. Synnex has over 484 employees with operations across Australia. Our headquarter is located in Melbourne, with offices in Sydney and Perth. As Synnex does not have any subsidiary, this statement covers the activities of Synnex only.

We believe respect for human rights is a fundamental value to our customers, our business partners and the broader community. To prevent any possible human rights abuse, we monitor, manage and report progress on a range of indicators used to assess the effectiveness of our responsibility towards modern slavery.

For this reporting period, our principal activities were the distribution of electronic technology products and software with no significant changes in nature. We have assessed our key business activities and supply chain as follows:

Main business activities	Supply chains		
Distribution of ICT products and services,	Over 80 international and local vendors		
including but not limited to hardware,	supplying ICT products, software, cloud -		
software, cloud-based solutions, and	based solutions and services to Synnex for		
lifecycle management services, to	reselling purpose. Our main vendors		
businesses or end customers.	include world known technology brands,		
	such as Microsoft, HP, Apple, Lenovo,		
	Samsung, etc.		
Business operations to support the daily	Contractors and sub-contractors who		
operations of Synnex other than the supply	deliver services directly to Synnex (i.e.		
of inventories and services for reselling	courier service)		
purposes.	Rental of offices		
	Utilities		
	Professional services consultants who		
	provide services directly to Synnex		
	Office consumables and promotional		
	merchandise		
	Uniforms and work attire (i.e. safety vests)		

Risk identification and assessment in our operations and supply chains

To identify and assess risks that are causing, contributing or directly linked to modern slavery, in this reporting period, we had continued to undertake reviews of potential risks across our operations and supply chain, by reviewing three main aspects:

- 1) Internal human resources
- 2) External supply chain related to distribution business segment
- 3) Other external supply chain related to daily operation

Internal risk assessment – HR practice

During this reporting period, Synnex has an average of 484 employees - 72% permanent and 28% casual. All employees, permanent or casual are employed in Australia. Our internal human resources policies protect them, and formal employment contracts are signed between Synnex and employees. Internally, we are committed to continually review and monitor our procedures and operations to minimize the risk of modern slavery practices within our internal operations.

Pre-employment screening and onboarding process

All employees recruited are individually assessed by our internal Human Resources (HR) department, according to our established recruitment policy. During our pre-employment screening, our HR department verifies and ensure applicants meet legal requirements such as visa requirements. HR completes all verifications connected with their role, such as Police checks, employment checks, etc. After completing the mandatory verifications, all employees sign an employment contract and receive their position description. Once they commence

employment at Synnex, all employees receive their role formal induction training. All new starters will be provided with Employee Manual, starting our policies, Code of Conduct, and Fair Work Statement. HR department has documentation for ongoing review and procedures for visa status management of non-Australian passport holders.

Ongoing compliance training

All employees receive regular training courses and information sessions pertaining to our policies and code of conduct. Additionally, team leaders and managers are extended invitations to participate in training sessions that specifically address their responsibilities, guidelines, and policies related to Equal Employment Opportunity, as well as Bullying and Harassment.

In light of this, Synnex has determined that there is a low to minimal risk of modern slavery within our internal operations, particularly in activities directly carried out by Synnex's employees. Any identified risks are comprehensively addressed through our established internal processes.

External suppliers risk assessment

Synnex is committed to maintaining the utmost ethical and professional standards, and we expect our suppliers and partners to embrace this commitment for fair and legitimate business interaction.

External supply chain – distribution of IT products and services

Synnex's major supply chain consists of over 80 ICT products and services suppliers. According to Global Slavery Index 2023 published in May 2023, electronics remained the highest value at risk import for the majority of G20 countries. As a distributor of laptops, computers, and other electronic products, Synnex recognizes the potential risks within our supply chain. In the recent reporting period, we maintained our emphasis on assessing modern slavery risks with our suppliers.

During this reporting period, we conducted in-depth analysis of our top 30 trade suppliers, which accounted for more than 90% of total procurement.

Through our deep analysis, it is noted that out of the 30 top suppliers, half have lodged their Modern Slavery Statement in Australia, and 26 have published Modern Slavery Statement and acknowledged their compliance with Australian Slavery Act 2018(Cth) or equivalent act in other jurisdictions. All 30 suppliers have published Corporate Social Responsibility Statement, outlining their commitment for responsible business practices, upholding human rights, and protecting the environments. Moreover, 18 suppliers are members of Responsible Business Alliance (RBA), which is the world's largest industry coalition dedicated to corporate social responsibility in the global supply chain. RBA also updates and shares the best practices in identifying and mitigating modern slavery risk. While not official members of RBA, a few suppliers have voluntarily complied with RBA audit, and the United Nations Guiding principles on Business and Human Rights.

Measurement Criteria	% of Top 10 Suppliers	% of Top 11-20 Suppliers	% of Top 21-30 Suppliers	Overall %
Publish of Modern Slavery Statement in Australia	70%	20%	60%	50%
Modern Slavery statement in compliance to Australian Modern Slavery Act 2018 (Cth), or equivalent act in other jurisdiction	100%	60%	100%	93%
Publish of Corporate Social Responsibility statement	100%	100%	100%	100%
Responsible Business Alliance(RBA) Membership	90%	40%	50%	60%

From Geographic risks perspective, we are aware that suppliers in some countries may be under higher risks of modern slavery. Out of our top 30 suppliers, 19 are headquartered in US and EU, which are subject to strong regulatory frameworks and government response, therefore indicates a lower level of geographic risks. 11 suppliers are based in Asia, including 2 in Japan, 1 in Singapore, 2 in South Korea, 2 in China and 4 in Taiwan. These suppliers have either published their own Modern Slavery Statements or have documented policies regarding human practices.

Despite the inherent risks associated with electronic products, overall, we are pleased to observe that a great portion of our major suppliers have taken proactive measures by implementing policies to identify and mitigate the risks of modern slavery.

External Supply Chain – Daily operation

In addition to vendors for our principal distribution business, other divisions of the supply chain that support our daily operation include professional services, courier services, utilities, rental services, and office supplies. When combining with the purchases of inventories and IT services, the daily operation purchase accounted for approximately 1.81% of the total purchase during 2022/23. From Geographic perspective, most of the services obtained were sourced domestically within Australia. This segment is considered to have a relatively low risk of modern slavery, attributed to the robust regulatory framework in Australia as well as our clearly defined internal policies regarding suppliers selection.

Our Actions, Policies and Procedures

We have formal policies in place to promote ethical and legally compliant business conduct and relationships. These policies contribute to our core value of "making a positive difference". We believe in sustainable development and strive to conduct our business with uncompromising integrity and professionalism, including our commitment to preventing violation of human rights.

Supplier Onboarding Process

We have established a supplier onboarding process, and through our Qualifying Supplier Program, we ensure all our suppliers are fully aware of our position over ethical business behaviour and zero tolerance over modern slavery practices. We achieve this by ensuring our Supplier Code of Conduct (SCC) has been delivered to our suppliers, and request their acknowledgment by obtaining their confirmation in writing. The SCC outlines Synnex's expectations for contracted suppliers, and servers as a key tool for preventing modern slavery in our supply chain. All forms of forced labour are banned in our SCC, including physical confinement in the work location, child labour, forced overtime and withholding of deposits or personal documents for employment.

Whistleblower Policy

We have established reporting procedures and mechanisms for employees and external parties to report any concerns regarding unethical or illegal conduct. Employees can report to their managers/CEO/CFO/HR, or if they wish to do so anonymously, can notify us through our whistleblower scheme by e-mail, phone, or online portal.

Employee Professional Code of Conduct

Synnex expects our business to be conducted with uncompromising integrity and professionalism. Our Code of Conduct sets out 4 basic principles and affirms that Synnex employees and third parties conducting business on behalf of Synnex are expected to observe the highest standards of ethics, honesty, and integrity. Each employee must sign and agree with our professional code of conduct during the staff on boarding process.

Assessing the effectiveness of our actions

Synnex is committed to continuously improving our processes to effectively assess modern slavery risk. During this reporting period, we didn't detect any modern slavery breach in our own operations, and based on our assessment of our supply chain, there was no significant incident reported.

We are pleased to highlight that our major vendors are prominent leaders in the IT industry, and the majority of them have proactively implemented policies to address and mitigate modern slavery risks. Through the analysis of our top 30 suppliers, it came to our attention that a few of them do not currently have published Modern Slavery Policies. We are committed to ongoing engagement with these suppliers to ensure continuous monitoring and address any potential modern slavery risks.

Synnex recognizes that evaluating the effectiveness of our policies and actions in addressing modern slavery risk is an ongoing and dynamic process. We remain committed to continually refining our assessment processes as part of our ongoing commitment to combating modern slavery.

Consultation process

Synnex Australia do not own or control any other entities and are not making a joint statement. Therefore, we are not required to consult with any other entities in giving this statement.

Moving forward

Over the next reporting period, our key focus will be to:

- Continue comprehensive risk analysis for our supply chain.
- Continue to review and update our suite of risk-related policies and governance control measures.

Our commitment to prevent modern slavery practices in our supply chain and internal operations are ongoing. We will continually review and improve on the measures we have established.

Approval

Preventing modern slavery and human rights abuse is consistent with the core values of Synnex.

This statement was approved by the Board of Directors of Synnex Australia Pty Ltd on 12th Dec 2023.

Kee Ong Director - Synnex Australia