

# Dicker Data Limited Modern Slavery Statement

Reporting Period: 1 January 2023 - 31 December 2023

ABN 95 000 969 362

**DICKER**  
D A T A

# Table of Contents

<b>CEO Commentary</b> .....	<b>4</b>
<b>FY23 in review</b> .....	<b>5</b>
<b>Part 1 – Structure, operations and supply chains</b> .....	<b>6</b>
1.1 Reporting entity.....	<b>6</b>
1.2 Who we are.....	<b>6</b>
1.3 Divisions of Dicker Data.....	<b>7</b>
1.4 Reporting period.....	<b>7</b>
1.5 Corporate Structure .....	<b>7</b>
1.6 Locations and operations .....	<b>8</b>
1.7 Workforce.....	<b>8</b>
1.8 Supply chains.....	<b>9</b>
<b>Part 2 – Identifying risks of modern slavery practices</b> .....	<b>10</b>
2.1 Methodology.....	<b>10</b>
2.2 FY23 results – forced labour risk exposure.....	<b>12</b>
<b>Supply chain risks</b> .....	<b>13</b>
2.3 Supply chain risk by jurisdiction .....	<b>13</b>
2.4 Supply chain risks by industry .....	<b>14</b>
2.5 Large multinational suppliers .....	<b>14</b>
2.6 Complex and non-transparent supply chains .....	<b>14</b>
2.7 Suppression of freedom of association.....	<b>15</b>
2.8 Cost pressures through purchasing practices .....	<b>15</b>
<b>Part 3 – Actions to assess and address risks</b> .....	<b>16</b>
3.1 Policies and Protocols.....	<b>16</b>
3.2 Updated our Reseller Terms and Conditions .....	<b>18</b>
3.3 Quantitative risk analysis .....	<b>18</b>
3.4 Education .....	<b>18</b>
3.5 Remediation.....	<b>18</b>
<b>Part 4 – Assessing the effectiveness of our actions</b> .....	<b>20</b>
4.1 Overview .....	<b>20</b>
4.2 Quantitative modern slavery risk analysis .....	<b>20</b>
4.3 Modern slavery risks in Dicker Data’s operations .....	<b>21</b>
4.4 Annual review by our Board.....	<b>21</b>
4.5 Grievance mechanisms.....	<b>21</b>

## Table of Contents continued

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<b>Part 5 – Consultation with controlled entities</b> .....	<b>23</b>
5.1 Consultation Process .....	<b>23</b>
<b>Part 6 – Other relevant information</b> .....	<b>24</b>
6.1 Operations .....	<b>24</b>
6.2 Interest rate rises .....	<b>24</b>
6.3 Challenges in our supply chains .....	<b>24</b>
6.4 FY24 and beyond .....	<b>24</b>

# CEO Commentary

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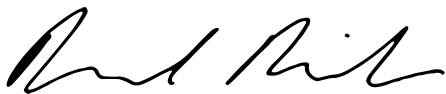
2023 has been a year of significant macroeconomic and geopolitical effects on global supply chains. These include a global shortage of microchips, ongoing conflict in Europe and the Middle East, high inflation rates and continued delays in the transport of goods. Despite these challenging market conditions, we were able to rely on the strength of our business and people to deliver outstanding results.

I am pleased to present our Modern Slavery Statement (**Statement**) for our fourth consecutive year of reporting under the *Modern Slavery Act 2018* (Cth) (**Act**), and to reaffirm our commitment to conduct business in an ethical manner.

During the year, we conducted a meaningful review of our modern slavery risk mitigation strategies and all the facets of our business in which such strategies are relevant. We have reviewed and evaluated the actions that we undertook over the last three reporting periods, and have put in place additional processes, procedures and policies to improve our performance in respect of limiting our exposure to modern slavery risk and to drive further improvements. We have also engaged FairSupply to undertake a quantitative modern slavery risk assessment based on our Tier 1 suppliers during the 2023 financial year.

This Statement covers each of the mandatory reporting criteria under the Act, and articulates:

1. how we approach modern slavery risks in our operations and supply chains;
2. the work undertaken during the reporting period to address and mitigate such modern slavery risks; and
3. our ongoing strategies to combat such modern slavery risks.



**David Dicker**  
**Chairman and Chief Executive Officer**

This statement was approved by the Board of Directors of Dicker Data Limited on 28 June 2024.

## FY23 in review

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In FY23, we achieved the following as part of our ongoing modern slavery risk management strategy:

- **(Policies and protocols)** reviewed all our policies, including the Code of Business Conduct, People and Culture Committee Charter and Corporate Governance Statement;
- **(Quantitative risks)** engaged FairSupply to:
  - » conduct a quantitative historical analysis of Dicker Data's modern slavery risk profile;
  - » categorise Dicker Data's Tier 1 suppliers on an industry and geographic basis for its risk assessment; and
  - » re-mapped and re-assessed our comprehensive supply chains using the categorised Tier 1 data;
- **(Qualitative risks)** performed year-on-year qualitative analysis of efforts by a set of Tier 1 suppliers to mitigate modern slavery;
- **(Grievances and Remediation)** received no reports of actual or suspected instances of modern slavery through any of our whistle blower channels;
- **(Training and Education)**
  - » continued to require all staff to complete the modern slavery training module on our ELMO Platform at least once per year, which empowers our staff to understand, identify and report modern slavery and its associated risks; and
  - » used internal communication initiatives to reinforce staff awareness of reporting mechanisms for modern slavery concerns;
- **(Engagement)** engaged and consulted with key personnel across our operations and controlled entities to assess, identify, address and mitigate modern slavery risks.

# Part 1 – Structure, operations and supply chains

Mandatory Criteria One and Two: Identify the reporting entity and describe its structure, operations and supply chains

## 1.1 Reporting entity

This Modern Slavery Statement is made by Dicker Data Limited ABN 95 000 969 362 (**Dicker Data, we, our or us**) which is the reporting entity under s5(1) of the Act. The Statement is presented on a consolidated basis by Dicker Data and its controlled entities.

## 1.2 Who we are

Dicker Data is an Australian-owned and operated, ASX-listed distributor of information technology (IT) hardware, software, cloud, access control, surveillance and emerging technology solutions for the corporate and commercial Australia and New Zealand markets with over 45 years of experience.

In FY23, our principal activities were the wholesale distribution of computer hardware, software and related products in Australia and New Zealand. This follows Dicker Data’s FY22 integration of the IT and Security divisions of Hills Limited (ASX:HIL), now known as Dicker Access and Surveillance (DAS).

With over 12,300 transacting partners who design, configure, deliver, and deploy the technology that we provide, we are a vital link in the value-added technology supply chain. 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 as sample of which is set out below. We have proven strategies and processes in place to efficiently on-board new brands and to begin delivering a return on investment quickly.

A sampling of the key brands in our supplier base is provided below:



Our resellers operate predominantly within Australia and New Zealand and as such benefit from the strong legislative framework in these jurisdictions in respect of their modern slavery mitigation strategies.

### 1.3 Divisions of Dicker Data

Dicker Data’s operations are structured into the following business divisions:

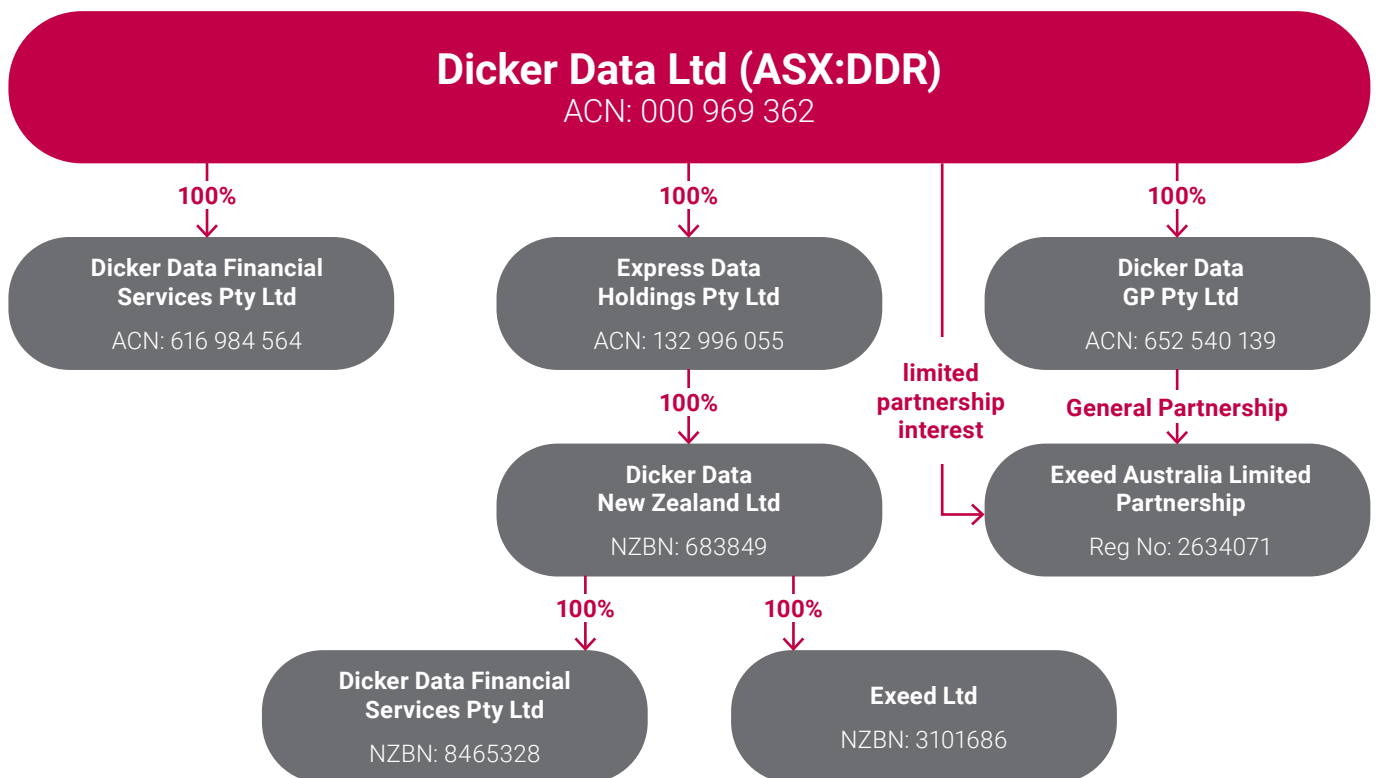
Division	Description
Dicker Data Australia	Wholesale value added distribution in Australia of IT hardware, software, cloud, access control, surveillance and emerging technologies.
Dicker Data New Zealand	Wholesale value added distribution in New Zealand of IT hardware, software, cloud, access control, surveillance and emerging technologies..
Dicker Data Financial Services	Provision of financial solutions for procurement of IT investments in Australia converting upfront capex into monthly payments.
Dicker Data Financial Services NZ	Provision of financial solutions for procurement of IT investments in New Zealand converting upfront capex into monthly payments.

### 1.4 Reporting period

This Statement is for the reporting period of 1 January 2023 to 31 December 2023, which is our financial year most recently completed. In this Statement, FY23 means the financial year ended 31 December 2023 and other financial years are referred to in a corresponding manner.

### 1.5 Corporate Structure

During FY23, the corporate structure of Dicker Data and its subsidiaries (together, the Group) was, and remains, as follows:



For reporting purposes under the Act, each subsidiary is a controlled entity of Dicker Data.

## 1.6 Locations and operations

Dicker Data operates and has physical locations in Australia and New Zealand.

We lease eighteen properties in Australia and New Zealand and primarily operate from our headquarters located at 238 Captain Cook Drive, Kurnell NSW 2231, Australia, which is owned by Dicker Data.

## 1.7 Workforce

### (a) Size of our workforce

As at the end of FY23, we had a workforce of 887 employees:

Location	Total employees	Permanent	Casual
Australia	686	651	35
New Zealand	213	195	18
<b>Total</b>	<b>899</b>	<b>846</b>	<b>53</b>

Following Dicker Data's substantial workforce increase by 110 employees after the FY22 establishment of DAS, the number of Australian employees remained relatively stable in FY23. Dicker Data's New Zealand workforce experienced organic growth in FY23 to support vendor portfolios and increasing business complexity. Our workforce continues to be comprised primarily of people with roles in sales, presales, products, IT, finance, warehouse and marketing.

### (b) Employee satisfaction survey

In FY23, Dicker Data again conducted its annual employee satisfaction and engagement survey on an anonymous basis (FY23 Survey). Some of the key outcomes of the FY23 Survey include the following:

- (i) 87% of respondents in Australia and 80% of respondents in New Zealand indicated that they believe that staff treat each other with respect; and
- (ii) 81% of respondents in Australia and 77% of respondents in New Zealand indicated that they are engaged (passionate, motivated and committed) in their role at Dicker Data.

Dicker Data remains committed to engaging our workforce, adjusting our policies to reflect their and the business' needs, and to creating a positive and ethical working environment.

### (c) Continuous workforce training

We also seek to upskill our people and provide them with tools to support their wellbeing. In FY22 Dicker Data launched, and continued to provide in FY23, access to all staff of over 400 courses covering a broad range of topics on the ELMO learning and development platform (ELMO Platform). Dicker Data's Employee Assistance Program provides our staff with access to three - confidential sessions with a counsellor to assist them with any mental health concerns and which are wholly funded by Dicker Data.

As part of the onboarding process, all new employees are required to complete and pass the ELMO Platform modules on modern slavery awareness, Work Health and Safety Awareness, Discrimination and Equal Employment Opportunity, Information Disclosures for Corporate



Whistleblowers, Workplace Bullying and Occupational Violence, Electronic Communication and Social Media, Privacy Awareness and Sexual and Sex-based Harassment Awareness. Additionally, all current employees are required to complete these modules every year.

## 1.8 Supply chains

In FY23, our supply chains consisted of 265 Material Tier 1 suppliers in Australia and New Zealand business divisions.

For the purposes of this Statement:

- (a) Tier 1 suppliers are businesses that provide goods and services directly to Dicker Data;
- (b) Tier 2 suppliers are businesses that provide goods and services directly to our Tier 1 suppliers or that contribute directly to the goods and services our Tier 1 suppliers provide to Dicker Data; and
- (c) Tier 3 suppliers are businesses that provide goods and services directly to our Tier 2 suppliers or that contribute directly to the goods and services our Tier 2 suppliers provide to our Tier 1 suppliers, which are then provided to Dicker Data,

and additional tiers of suppliers have a corresponding meaning. Further details of our suppliers and relationships with our suppliers is set out in Part 2 of this Statement.

## Part 2 – Identifying risks of modern slavery practices

Mandatory Criterion Three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.

### 2.1 Methodology

(a) **Overview**

For our fourth consecutive year, Dicker Data engaged FairSupply to undertake a review of our exposure to forced labour risks (in the context of modern slavery) in our supply chains. FairSupply then provides us with useful data that we can use to assess our exposure to forced labour risk and evaluate our progress in relation to managing that risk on a quantitative basis.

(b) **Materiality threshold**

In FY23, Dicker Data applied a materiality threshold to its analysis of Tier 1 suppliers. Only Tier 1 suppliers with whom we had spent a minimum of \$200,000 during FY23 (**Materiality Threshold**) were included in our analysis. In this Statement, a reference to **Material Tier 1 supplier** is a reference to a Tier 1 supplier that satisfied the Materiality Threshold in FY23. After applying the Materiality Threshold, the Material Tier 1 suppliers constitute 99.1% of our total procurement spend for FY23.

(c) **Limitations to the results**

- (i) **(Forced labour risks only)** FairSupply’s analysis is limited to forced labour risks (both private and state-imposed). Forced labour risk is the risk that a victim may not be free to stop working or to leave their place of work. Forced labour risk is a subset of modern slavery risk, and does not include the other types of modern slavery risk.
- (ii) **(Materiality threshold)** We provided a list of all of our Tier 1 suppliers and our FY23 total procurement spend for each of those Tier 1 suppliers to FairSupply. FairSupply’s analysis was limited to our Material Tier 1 suppliers.
- (iii) **(Comparison to FY22)** FairSupply’s analysis for FY23 is based on a different data set than in FY22:

- (A) **FY22** – the analysis is based on all of our vendors (that are Tier 1 suppliers) from whom we purchased trading stock (but excludes other Tier 1 suppliers such as freight and services); and
- (B) **FY23** – the analysis is based on all of our Tier 1 suppliers that satisfied the Materiality Threshold for this period. We consider this to be a more appropriate data set from which to analyse our forced labour risks, as it better represents our various supply chains.

Consequently, we do not make a direct comparison of our forced labour risks and performance in relation to managing that risk between FY23 and FY22. Our FY22 Modern Slavery Statement should not be directly compared to this Statement.

(d) **Explaining the metrics**

- (i) The key metric that FairSupply uses is the theoretical number of forced labourers in

our supply chains. This metric is used to assess our forced labour risk by providing a number of estimate forced labourers attributable to:

- (A) **entire procurement spend** - this is calculated by aggregating the estimated number of people in forced labour along the length of our supply chains (and accounts for tiers beyond Tier 1). This forced labour footprint is measured by the estimated people in forced labour relative to all the spend data for FY23.
- (B) **per \$ million procurement spend** – this measure provides the estimated number of people in forced labour relative to each million dollars spent on our procurement activities during FY23.

(ii) While we have provided the results for both metrics below, the per \$ million procurement spend metric is a better indicator of our overall performance, as the entire procurement spend metric is directly correlated to our total procurement spend. Overreliance on the entire procurement spend metric could result in the incorrect perception that simply reducing overall spend will reduce our forced labour risk.

(iii) FairSupply has also provided us with the overall results of:

- (A) the forced labour risk associated with each of our Material Tier 1 suppliers (which is weighted for annual spend and extends to their full supply chains); and
- (B) the key risk categories to which our supply chains extend (beyond Tier 1 up to Tier 10 and beyond).

**(e) Explaining FairSupply’s process**

FairSupply uses a proprietary algorithm to link Dicker Data’s Tier 1 supplier spend data for FY23 with global trade flow data through multi-regional input-output tables (**MRIO**). FairSupply uses comprehensive supply chain data from 208 countries, which represents more than 98% of global gross domestic product. The MRIO is regularly updated and drafts information from a number of sources including the United Nations’ System of National Accounts, the Walk Free Foundation’s Global Slavery Index, and national statistics aggregator agencies across the world (including the Australian Bureau of Statistics).

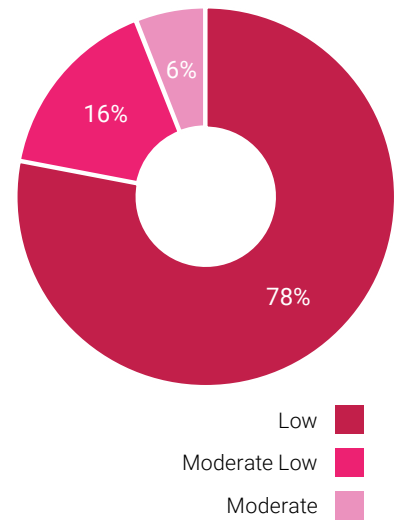
**(f) Benefits to engaging FairSupply**

Another benefit to engaging FairSupply is that their analysis provides Dicker Data with information about suppliers beyond those that we have direct contact with. This helps to identify where the risk of forced labour most greatly presents itself and the percentage of our expenditure being represented at that level. In doing so, Dicker Data can better understand if we are potentially causing, contributing to, or are directly linked to, relevant forced labour risk and determine our ability to leverage our relationships with suppliers to direct, negotiate or question purchasing decisions further up our supply chains to lessen or mitigate that risk.

## 2.2 FY23 results – forced labour risk exposure

(a) **Material Tier 1 Supplier Risk Analysis**

FairSupply’s analysis of Dicker Data’s 265 Material Tier 1 suppliers, found that 78% of our suppliers were low risk, 16% posed a moderate low risk and 6% has a moderate risk. Pleasingly, none of our Material Tier 1 suppliers were rated as posing a moderate high or high risk.



(b) **Per \$ million procurement spend<sup>1</sup>**

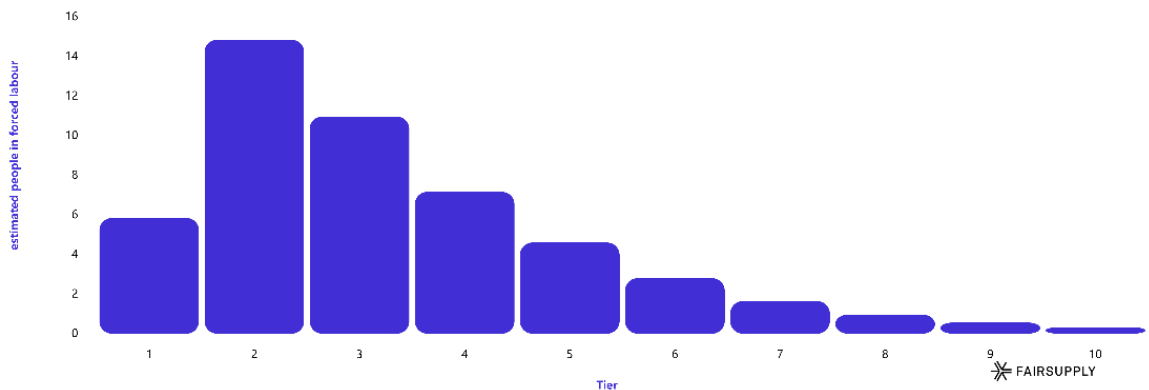
Dicker Data had exposure to approximately 0.0154 people in forced labour or forced labour-like conditions per \$ million procurement spend during FY23.

(c) **Entire procurement spend – Tiers 1 to 10<sup>2</sup>**

Based on Dicker Data’s entire FY23 procurement spend with Material Tier 1 suppliers, we had exposure to approximately 50.0192 people in forced labour across Tier 1 suppliers to Tier 10 suppliers.

As mentioned above, this metric is not a good measure of our progress to reduce our forced labour risks, as an increase in procurement spend correlates with an increase in total forced labour risk exposure.

The below graph depicts the breakdown of the probable number of people working in forced labour or forced labour-like conditions plotted across Dicker Data’s Tier 1 suppliers to Tier 10 suppliers, based on our Material Tier 1 suppliers and weighted for total procurement spend with each Material Tier 1 supplier for FY23.



This graph shows that Dicker Data’s greatest forced labour risk exposure lies in its suppliers from Tier 2 suppliers and beyond. This an expected outcome given the nature of our business and suppliers.

See further Part 4 for an evaluation and analysis on the impact and of these results.

<sup>1</sup> See paragraph 2.1(d)(i)(B) for an explanation of the per \$ million procurement spend metric.

<sup>2</sup> See paragraph 2.1(d)(i)(A) for an explanation of the entire procurement spend metric.

# Supply chain risks

## 2.3 Supply chain risk by jurisdiction

With 265 unique Material Tier 1 suppliers across our operations, Dicker Data had 150 Material Tier 1 suppliers based in Australia and 30 Material Tier 1 suppliers based in New Zealand. Australian- and New Zealand-based Material Tier 1 suppliers represented 67.92% of all of our Material Tier 1 suppliers and a significant proportion of our total procurement spend for FY23. While neither country is immune to modern slavery, their strong regulatory frameworks and focus on human rights significantly reduces the risk of modern slavery occurring in such jurisdictions.

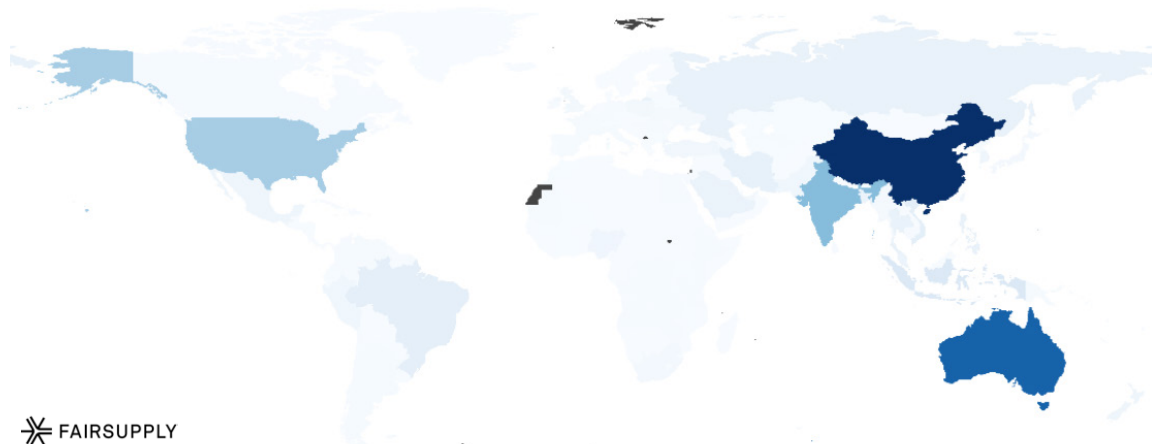
43 of our 265 Material Tier 1 suppliers were located in the United States of America (**US**), United Kingdom (**UK**) and in various countries in Europe. These countries have similar anti-slavery laws and protections in place, so suppliers operating from these jurisdictions are considered to pose a lower modern risk. According to the Global Slavery Index 2023 (2023 GSI), the UK, Australia and the US rank first, second and fifth (respectively) in terms of governmental response to modern slavery risk, indicating positive steps to combat modern slavery risks in the regions from which we largely procure from.

Similar to previous reporting periods, the concentration of our exposure to forced labour risks were most acute in China, but also prevalent in Australia and the US.

Based on the 2023 GSI:

- (a) China had a score of 46 (out of 100) for vulnerability to modern slavery, an estimated prevalence of 4 people living in modern slavery for each 1,000 people, and a government response score of 40 out of 100;
- (b) United States had a score of 25 (out of 100) for vulnerability to modern slavery, an estimated prevalence of 3.3 people living in modern slavery for each 1,000 people, and a government response score of 67 out of 100; and
- (c) Australia had a score of 7 (out of 100) for vulnerability to modern slavery, an estimated prevalence of 1.6 people living in modern slavery for each 1,000 people, and a government response score of 67 out of 100.

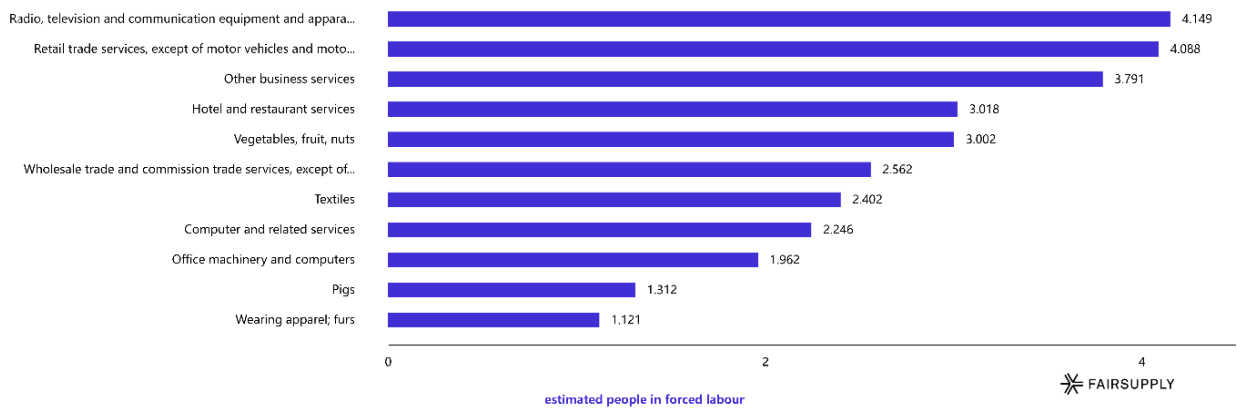
The below graphic shows the countries for which the risk of forced labour occurring in our supply chains is most greatly concentrated. This graphic indicates our forced labour risk across all tiers of suppliers, and is based on our Material Tier 1 suppliers and weighted for entire procurement spend.



## 2.4 Supply chain risks by industry

The industry in which a particular supplier operates is a significant determining factor in assessing our aggregate forced labour risk exposure. For Dicker Data, the significant sources of industry risk are derived from our procurement of computer hardware and software for distribution in Australia and New Zealand.

The top 11 industries that presented a heightened forced labour risk are as follows:



This diagram is aggregated at the industry rather than supplier level. The numbers are an estimate of the total number of people in forced labour in Dicker Data’s infinite supply chains attributable to that industry based on the amount spent by Dicker Data with Material Tier 1 suppliers in that industry. Each category name is representative of a group of companies that fall within that category.

These industries have 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. Machinery, electronic equipment and computers 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”. With global chip shortages across the world, there was a distinct downward pressure on the supply of necessary inputs, potentially leading to increased modern slavery risk.

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 consistently represent our greatest risk from year to year.

## 2.5 Large multinational suppliers

Many of our Material Tier 1 suppliers are large multinational companies. While Dicker Data is a significant customer, it is not commercially feasible to impose any specific or novel modern slavery-related requirements (such as audits and training requirements) on those suppliers or those suppliers’ supply chains. This means that we rely on their own assessment of compliance with the Act and applicable modern slavery laws, which elevates the risk that modern slavery practices are not uncovered or addressed.

## 2.6 Complex and non-transparent supply chains

We rely on inputs from a large number of suppliers across multiple tiers, many of which are located in different countries. It can be difficult to fully map our supply chains particularly where our suppliers rely on their own, often confidential, supply chains.

Where we are a reseller of IT and other products from certain businesses, we often have limited visibility of those business' supply chains and any measures we take may affect the commercial relationship with such businesses.

## 2.7 Suppression of freedom of association

Given the prevalence of unskilled or low skilled labour in the IT product manufacturing process and low barriers to entry, there is an elevated risk that some of our suppliers may engage in activities which suppress workers' rights to form associations or unionise.

## 2.8 Cost pressures through purchasing practices

There are certain purchasing practices which may increase the risk of a supplier participating or being complicit in modern slavery practices such as:

- (a) the use of employment agencies within supply chains may lead to a loss of transparency and visibility over our suppliers' engagement practices of required human resources; and
- (b) not placing orders with sufficient lead or production times, which may require a supplier to use forced labour over extended periods to fulfil such orders.

## Part 3 – Actions to assess and address risks

Mandatory Criterion Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.

### 3.1 Policies and Protocols

A fundamental part of our modern slavery strategy is our approach to corporate governance and management oversight, most readily evidenced by our policies and protocols. These policies and protocols help us embed anti-slavery principles in our company and ensure we mitigate modern slavery risk in a consistent manner in our operations and supply chains. Dicker Data’s board of directors (Board) conducts an annual review of our key policies and protocols with our management team.

Policy	Review date	Further information
Supplier Code of Conduct	28 June 2024	In FY24, Dicker Data plans to implement a Supplier Code of Conduct. The purpose of the Supplier Code of Conduct will be to provide a clear set of principles and standards to which we expect our suppliers to adhere. It will also cross-refer, and clarify the application of, any other policies to which our suppliers are required to comply with. The proposed Supplier Code of Conduct is a key part of our ongoing modern slavery risk mitigation strategy. It will set out our expectations that our suppliers act ethically by promoting high standards of integrity, behaviour in accordance with Dicker Data’s values, fair dealing practices, compliance with laws, fair employment practices and to deter wrongdoing. Our suppliers will be expected to comply with the Supplier Code of Conduct and to ensure that their suppliers also comply with the substantive provisions.
Modern Slavery Policy	28 June 2024	In FY24, Dicker Data plans to implement a Modern Slavery Policy. This policy will apply in respect of Dicker Data’s operations and our suppliers. The proposed Modern Slavery Policy will centralise and clearly state our principles in relation to modern slavery. The purpose of the Modern Slavery Policy is to promote widespread understanding of what modern slavery is, assist Dicker Data with effectively and efficiently addressing instances of actual or suspected modern slavery and streamline reporting for future modern slavery statements.
Corporate Governance Statement	27 February 2023	Dicker Data’s Corporate Governance Statement provides our principal corporate governance practices in place for each 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 FY22’s Corporate Governance Statement, Dicker Data outlined our Environmental, Social and Governance (ESG) response, including our social sustainability risks. The Statement communicated Dicker Data’s approach to salient human rights and labour risks and the



		<p>actions taken to combat them.</p> <p>In FY23, the Board approved a number of changes to our Corporate Governance Statement. The substantive changes include the following:</p> <ul style="list-style-type: none"> <li>including additional categories in the Board skills matrix such as industry and leadership experience, ESG and data security;</li> <li>providing information regarding the measures implemented across the business to foster Dicker Data's commitment to equality, safety and respect; and</li> <li>updating our core values.</li> </ul>
Audit & Risk Management Committee Charter	22 December 2023	<p>The Audit and Risk Management Committee Charter outlines the responsibilities of the Committee by the Board of Directors of Dicker Data. The Committee assists the Board to fulfil its statutory, fiduciary and regulatory responsibilities.</p> <p>The Committee is expressly given the responsibility of reporting to the Board on matters relating to ESG risks, including social sustainability risks, and formulating strategies on how to manage such risks.</p> <p>In FY23, the Board did not require any substantive changes to be made to the Audit &amp; Risk Management Committee Charter.</p>
Code of Business Conduct	22 December 2023	<p>The Dicker Data Code of Business Conduct (Code) sets out our core values, commitments, standards and policies for our business and our people. Endorsed by the Board, the Code applies to all employees of Dicker Data as well as those who act on behalf of, or are associates of Dicker Data.</p> <p>Our Code commits Dicker Data to supporting the United Nations' Universal Declaration of Human Rights and the International Labor Organisation's Fundamental Conventions. The Code requires that employees report if any actual or suspected modern slavery instances or practices are found and to participate in training on modern slavery from time-to-time.</p> <p>In FY23, the Board did not require any substantive changes to be made to the Code of Business Conduct.</p>
Whistleblower Policy	22 December 2023	<p>We believe that every employee should have the chance to speak up anonymously when they see or suspect conduct not aligned to our corporate values or not in compliance with applicable laws. Our Whistleblower Policy establishes the mechanism by which our staff can freely (and anonymously, if desired) report conduct, or suspected conduct, that goes against the values and standards of Dicker Data. This includes any concerns regarding modern slavery in our operations and supply chains.</p> <p>In FY23, the Board did not require any substantive changes to be made to the Whistleblower Policy.</p>

### 3.2 Updated our Reseller Terms and Conditions

In FY24, we are in the process of updating our reseller terms and conditions to address and include provisions relating to modern slavery, including by requiring:

- (a) compliance with the Act and the *Criminal Code Act 1995* (Cth);
- (b) timely provision of modern slavery-related information, and
- (c) warranties that each reseller has not engaged in modern slavery and there are no facts or circumstances which may result in an investigation or claim being brought against that reseller.

### 3.3 Quantitative risk analysis

As in prior financial years, we engaged FairSupply in FY24 to conduct a retrospective quantitative analysis of Dicker Data's forced labour risk exposure. The methodology and results of FairSupply's analysis are set out in full in Part 2 above.

The key themes from FairSupply analysis includes the following:

- (a) **(Increased risks in Tier 2 and beyond)** The majority of our risk arises in tiers of suppliers beyond our Material Tier 1 suppliers, limiting our ability to appropriately leverage our relationships to mitigate such risk.
- (b) **(Geographic risk)** China continues to be the key jurisdiction associated with the highest forced labour risk in our supply chains. During FY23, however, Australia has become the second largest jurisdiction associated with forced labour risk in our supply chains. This is a result of the fact that Australian Material Tier 1 suppliers constitute the largest proportion of our Material Tier 1 Suppliers (both by number and by value), and that the geographic analysis (see paragraph 2.3) uses the total procurement spend metric. Despite this concentration, we consider the risk of forced labour occurring in our Australian Material Tier 1 suppliers to be relatively low, particularly given Australia's strong government response scores in the 2023 GSI and the industries in which we operate.
- (c) **(Effect of expenditure)** The changes in our Material Tier 1 supplier spend that come with the expansion of Dicker Data over the last three years has significantly altered the forced labour risk profile of our supply chains. However, FairSupply's analysis allows Dicker Data to identify industries and geographic areas with heightened forced labour risk, which can then be addressed appropriately.

### 3.4 Education

Dicker Data rolled out and provided access to our ELMO Platform to all staff initially in FY22 and continued to do so in FY23. The ELMO Platform provides a centralised training and education resource for all of Dicker Data's staff with over 400 available courses to better equip them with skills and knowledge relating to their career, and it includes a specific module dedicated to modern slavery training.

Our modern slavery training module was formed to provide an appropriate and uniform educational guide to our staff, with the aim to equip them with the requisite knowledge to recognise, report and mitigate any risks or instances of modern slavery within our operations or supply chains. The modern slavery module is compulsory for all staff to complete, both during the onboarding process and annually.

### 3.5 Remediation

Dicker Data does not have a codified remediation action plan that it requires suppliers to undertake if modern slavery or modern slavery risk factors are identified in a supplier's operations or supply chains.

The benefit of this approach is that it allows us to work flexibly with suppliers to create favourable and practically achievable outcomes.

Dicker Data takes any identified risks or instances (actual or suspected) of modern slavery very seriously. We also recognise that simply terminating a supplier relationship may not always be in the best interests of victims, so a tailored approach is typically required.

This may mean that we may take a range of actions if a modern slavery risk or instance (actual or suspected) is identified within a supplier's operations or supply chains. Our response will generally involve the following:

- (a) **(Internal planning)** senior executives or the Board will convene a meeting to discuss, consider and decide on the following:
  - (i) in relation to that modern slavery risk or instance, its severity, the role of that supplier in our supply chains and its likely impact on our business (if any);
  - (ii) whether, under the circumstances, it is appropriate to work with the supplier to implement a performance improvement plan to remediate that risk or event, or if the supplier relationship should be terminated; and
  - (iii) any legal rights or obligations that Dicker Data may have under the circumstances, including whether to report a supplier to the appropriate authorities;
- (b) **(Supplier consultation)** we would consult the supplier to allow it to respond to the allegation that a modern slavery risk or instance exists in its operations or supply chains, and provide information on how it plans to remediate that risk or instance (if possible);
- (c) **(Decision)** the senior executives or Board will convene another meeting and make a formal decision on how Dicker Data will deal with the modern slavery risk or instance, and what actions it will take; and
- (d) **(Execute decision)** senior executives or the Board will ensure that its decision is executed in relation to that supplier and the modern slavery risk or instance, in whatever form is decided.

In FY23, no actual or suspected instances of modern slavery were found or reported in Dicker Data's supply chains.

## Part 4 – Assessing the effectiveness of our actions

Mandatory Criterion Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

### 4.1 Overview

In FY23, Dicker Data did not uncover any instances of modern slavery in its operations or in any of its supply chains.

### 4.2 Quantitative modern slavery risk analysis

Dicker Data engaged FairSupply to conduct a historical quantitative analysis of forced labour risk based on our Tier 1 suppliers and our entire procurement spend for FY23. This analysis provides objective metrics by which we can measure our success in mitigating forced labour in our supply chains.

Some of the key themes emerging from this analysis includes the following:

(a) **Materiality Threshold**

In FY23, we applied the Materiality Threshold of \$200,000 to our Tier 1 suppliers for inclusion in the FairSupply quantitative risk assessment. We consider this threshold to be appropriate, as it:

- (i) allows us to capture the forced labour risk associated with 99.1% of total procurement spend for a given period; and
- (ii) focuses our analysis on Tier 1 suppliers with whom we hold significant professional relationships and with whom we have a higher likelihood of effecting positive change (if needed).

The exact quantum will be assessed annually, but we are likely to apply a similar materiality threshold to our Tier 1 supplier analysis in future periods.

(b) **Comparison to prior years**

FairSupply's analysis was based on a different data set in FY23 (being all Material Tier 1 suppliers), compared to FY22 (being limited to all Tier 1 suppliers of trading stock only). This makes it difficult to assess our performance in FY23 against prior years, as a simple comparison between the metrics may not be a reliable indicator of our recent performance. In future periods, we will ensure that FairSupply's analysis is conducted on a similar basis, and consistent with, prior periods.

(c) **Reactive and limited risk assessment**

While FairSupply's quantitative analysis provides useful information on Dicker Data's forced labour risk exposure, its key shortcomings include:

- (i) being reactive and not allowing Dicker Data to track and proactively manage its modern slavery risk exposure in real time; and
- (ii) (i) being reactive and not allowing Dicker Data to track and proactively manage its modern slavery risk exposure in real time; and
- (ii) the analysis is limited to tracking the risk of forced labour occurring in our supply chains (and does not address other forms of modern slavery).

In FY24, Dicker Data will consider adopting and implementing new technologies which allows us to track our changing modern slavery risk profile in real time, and act appropriate in circumstances where certain suppliers, industries and geographies are identified as having heightened risk profiles.

(d) **Changing geographies of risk concentration**

The countries in which Dicker Data’s risk of forced labour occurring in its supply chains is most acute in Australia (behind China). We consider the risk of forced labour and other types of modern slavery occurring in Australia to be low due to its high government response scores and strong regulatory environment. However, the concentration of forced labour risk in this jurisdiction allows Dicker Data a degree of flexibility in its approach to addressing that risk. In FY24, we will explore more comprehensive ways in which the risk of modern slavery occurring in Australia can be identified and addressed.

### 4.3 Modern slavery risks in Dicker Data’s operations

We consider the following factors reduce the risk of modern slavery occurring in our operations:

- (a) our employees are experienced and highly skilled specialists in their respective fields;
- (b) strong regulatory and legislative labour law frameworks within Australia and New Zealand, including under the Fair Work Act 2009 (Cth);
- (c) robust screening, onboarding and continuous oversight of employees by our People and Culture Committee (as governed by the Dicker Data [People and Culture Committee Charter](#)) and the executive team;
- (d) all of Dicker Data’s staff are required to act in an ethical and professional manner, as specified in our [Code of Business Conduct](#), internal policies and employee handbook;
- (e) all of Dicker Data’s staff are required to complete the modern slavery training module every year on the ELMO Platform; and
- (f) our internal operations contain appropriate controls and oversight to ensure that employees are properly remunerated for their work.

We consider that the above measures, safeguards and systems are sufficient to manage Dicker Data’s modern slavery risks within its internal operations in Australia and New Zealand.

### 4.4 Annual review by our Board

Dicker Data’s board and senior management conduct annual reviews of its modern slavery risk mitigation strategy and implementation. These include:

- (a) an annual review of all of Dicker Data’s policies;
- (b) a holistic review of our strategy when preparing Dicker Data’s annual modern slavery statement;
- (c) a specific review of our quantitative modern slavery risk in consultation with FairSupply (when preparing our retrospective modern slavery risk analysis); and
- (d) ad hoc reviews as new risks or issues arise

## 4.5 Grievance mechanisms

In FY23, Dicker Data implemented the following grievance mechanisms available to its staff and internal operations:

- (a) **Whistleblower reporting** – in accordance with Dicker Data’s Whistleblower Policy, staff may confidentially (and without retaliation) report any actual or suspected instances, or risks, of modern slavery. A variety of reporting channels are available to staff, including by email to [whistleblower@dickerdata.com.au](mailto:whistleblower@dickerdata.com.au), a secure postbox located within Dicker Data’s premises and by speaking directly to any manager or leader within Dicker Data’s operations.
- (b) **Employee Handbook** – Dicker Data’s employee handbook contains the following information:
  - (i) it confirms that any whistleblower channel can be used to report actual or suspected instances of modern slavery;
  - (ii) our respectful behaviour policy; and
  - (iii) a grievance mechanism by which any staff member can raise complaints relating to modern slavery or any other relevant matter.

In FY23, Dicker Data did not receive any reports of actual or suspected instances of Modern Slavery in its operations or supply chains through any whistleblower channels.

Our current strategy in respect of grievance mechanisms does not account for the inherent shortcomings of having to self-report instances of actual or suspected modern slavery. While our Whistleblower Policy is published on our website and made publicly available, the grievance reporting mechanisms are not available to our suppliers or their staff. The current scope of this Policy is limited to our internal operations.

In FY24, we will seek to identify ways in which the grievance mechanisms in both our internal operations and supply chains can be improved. Our planned approach includes arranging for direct meetings with our Tier 1 suppliers to discuss and consider more appropriate grievance mechanisms in the context of modern slavery and Dicker Data’s industry. We also plan to:

- (a) make our whistleblower email address known to all of our Tier 1 suppliers and their staff;
- (b) explore ways in which we can map our Tier 2 suppliers and Tier 3 suppliers;
- (c) explore the value and feasibility of requiring any new suppliers to complete self-assessment questionnaires as part of our onboarding and renewal processes; and
- (d) continue to engage FairSupply (or similar provider) to perform a risk analysis to evaluate our changing risk profile in respect of modern slavery.

## Part 5 – Consultation with controlled entities

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Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls

### 5.1 Consultation Process

As Dicker Data continues to grow, so too does the need to ensure that we maintain a unified response to address modern slavery risks across our operations and supply chains. We recognise that each of our controlled entities have an integral role in ensuring a consistent group-wide approach to the risk of modern slavery and as such, we have implemented a number of initiatives to ensure a holistic and uniform approach to modern slavery.

While Dicker Data and its Subsidiaries are centrally managed from our headquarters at 238 Captain Cook Drive, Kurnell NSW 2231, Australia, our operations are structured into the following 4 distinct business divisions:

- Dicker Data Australia;
- Dicker Data New Zealand;
- Dicker Data Financial Services; and
- Dicker Data Financial Services NZ.

During the course of FY23, we undertook consultation with our controlled entities and business divisions as follows:

- (a) strategic meetings between the Board, key executives and key staff and stakeholders across our business divisions to ensure that our strategy and requirements are consistently applied across Dicker Data's business;
- (b) our policies and procedures apply equally to all of Dicker Data's business divisions, and ensures a consistent approach to addressing modern slavery risks; and
- (c) completing the modern slavery training module is a mandatory annual process for all of Dicker Data's staff, which helps to ensure that our staff have a sufficient minimum understanding of modern slavery risks and facilitates a uniform approach to addressing modern slavery risks.

## Part 6 – Other relevant information

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Mandatory Criterion Seven: Any other relevant information

### 6.1 Operations

Dicker Data expects that changes in the supply chains of IT-related hardware will lead to a shift in market demand and pricing of our goods. Dicker Data also had significant exposure to adverse macroeconomic factors, which include:

- (a) rising inflation and interest rates;
- (b) fluctuating foreign exchange rates; and
- (c) lingering supply challenges which started or became acute during the COVID-19 pandemic.

As a result of these conditions, Dicker Data will be required to undertake a more disciplined approach to our investments and expenditure to ensure our ongoing profitability. However, Dicker Data is also committed to maintaining our focus on identifying and mitigating modern slavery risks in our supply chains and achieving our overall sustainability goals.

### 6.2 Interest rate rises

During FY23, Australia experienced 10 official interest rate rises and many other countries experienced similar rate hikes. In general, this has the potential to increase modern slavery risk by affecting the profitability and viability of many businesses. However, Dicker Data has continued to provide work to its suppliers and worked with them to ensure that undue pressure is not applied when placing purchase orders.

### 6.3 Challenges in our supply chains

In FY23, Dicker Data continued to face certain challenges in its supply chains. These challenges included:

- (a) a global shortage on the supply of computer microchips (and increased associated costs);
- (b) lingering supply challenges which started or became acute during the COVID-19 pandemic, such as delayed deliveries and inflated transportation costs; and
- (c) increased prices of fuel, certain raw materials and disrupted supply chains due to ongoing geopolitical instabilities in Europe, Asia and the Middle East.

During the course of FY23, some of our supply delays and backlogged orders have started to subside, but the challenges remain.

### 6.4 FY24 and beyond

We will continue to comprehensively analyse our operations and supply chains with support from industry experts and technology providers to better understand our sources of modern slavery risk and formulate appropriate strategies to effectively address and mitigate such risks.

Dicker Data's board considers that our economic performance is tied to our ongoing sustainability and anti-slavery commitments, and that such goals are not mutually exclusive. As such, we continue to improve our approach to sustainability, ethical behaviour and corporate social responsibility, including with respect to modern slavery risk.



For future reporting periods, we plan to focus on the following specific issues as part of our commitment to continually improving our capacity for effective modern slavery risk identification and mitigation:

- (a) we will engage FairSupply (or other independent provider) to prepare a retrospective analysis of forced labour risk in our supply chains;
- (b) we will adopt and implement a modern slavery policy and supplier code of conduct;
- (c) we will continue to mandate that all staff complete the annual modern slavery training module on the ELMO Platform, and update that module if required;
- (d) we will investigate, develop and implement (as appropriate) grievance channels for our Tier 1 suppliers, including by providing access to those channels in other languages;
- (e) we will investigate whether, and if so, how we can map further tiers of our supply chains, with a focus on Tier 2 suppliers and Tier 3 suppliers;
- (f) we will investigate whether, and if so, how we can commence real time and responsive modern slavery due diligence in respect of our Tier 1 suppliers; and
- (g) we will investigate and consider whether such due diligence efforts should apply equally to all Tier 1 suppliers, or whether a tailored approach would be appropriate taking into account a Tier 1 supplier's modern slavery risk level, geographic location, importance to our business and other relevant facts or matters.

## Document Management

Revision Date	Nature of Amendments
28 June 2024	Approved by the Board of Dicker Data
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