



Modern Slavery Statement FY2024

December 2024

Reporting period: 1st July 2023 to 30th June 2024

Background

Modern slavery is an ongoing issue worldwide. The World Economic Forum has found that slavery in supply chains amounts to \$150 billion USD of illicit profits a year and that there are 46 million victims of modern slavery. Unfortunately, two-thirds of modern slavery occurs in the Asia – Pacific region, where many Australian supply chains extend.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour and child labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- aiding, abetting, counselling or procuring any of the above offences,

All of these practices deprive individuals of their liberty in order to exploit them for personal or commercial gain. Mantel Group has a commitment to conduct its business and all its relationships based on integrity.

Mantel Group has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business or in any of its supply chains.

Modern Slavery Statement Reporting Requirements

This statement has been prepared by Mantel Group Pty Ltd ACN 622 268 240 and its subsidiaries (“**Mantel Group**”) in accordance with the Modern Slavery Act 2018.

This statement was approved by the Board of Directors of Mantel Group in their capacity as principal governing body of Mantel Group Pty Ltd on 18 December 2024.



Michael Bodle
Director & Company Secretary

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1. Identify the reporting entity

Mantel Group operates under the ultimate Australian parent company Mantel Group Pty Ltd (ACN 622 268 240) and its wholly owned Australian & New Zealand subsidiaries:

- Mantel HoldCo Pty Ltd (ACN: 656 235 808)
- Mantel MidCo Pty Ltd (ACN: 656 236 225)
- Mantel BidCo Pty Ltd (ACN: 656 236 396)
- Mantel Operations Pty Ltd (ACN: 656 235 559)
- Mantel Operations Ltd (NZBN: 9429050658558)
- Transform Properties Pty Ltd t/a CMD Solutions (ACN: 143 707 582)
- Pretzel Lab Pty Ltd (ACN: 646 457 865)
- Kasna Cloud Pty Ltd (ACN: 629 424 255)
- Itty Bitty Apps Pty Ltd (ACN: 137 547 838)
- Itty Bitty Labs Pty Ltd (ACN: 611 542 262)
- Eliiza Pty Ltd (ACN: 622 520 594)
- DigIO Pty Ltd (ACN: 622 520 558)
- Cuusoo Pty Ltd (ACN: 648 940 336)
- Azenix Pty Ltd (ACN: 647 695 323)
- Aginic Group Pty Ltd (ACN: 624 071 076)
- Aginic Holdings Pty Ltd (ACN: 618 003 419)

2. Describe the reporting entity's structure, operations and supply chains

Founded in 2017, Mantel Group is a proudly Australian and New Zealand owned Information Technology (IT) Professional Services organisation. We have over 850 team members, with the vast majority permanent employees, all employed in Australia and New Zealand.

Mantel Group operates as a House of Brands with a focus on providing technology solutions and services to Australian and New Zealand clients in:

- Digital
- Cloud
- Data
- Security
- Managed Services

We currently do not outsource or offshore any of our key business operations. Payroll, Finance, Talent Acquisition, Marketing, Sales are all delivered in house through our employees

3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

In the reporting period, Mantel Group operated exclusively in Australia and New Zealand, a region which is recognised in the Modern Slavery Index to have a low risk. Furthermore, the inherent nature of professional services means that the risk in our operations is also low.

Our major supply chains are limited to IT hardware and software companies (major vendors - AWS, Google, Microsoft, Databricks, and Apple) all of which have their own Modern Slavery policies and reporting obligations.

4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

To underpin our policy commitments, Mantel Group endeavours to;

- Ensure our employees and direct contractors are remunerated appropriately. We conduct market and award reviews of our remuneration quarterly.
- Determine which parts of our own business and which of our supply chains are at risk from modern slavery, if any, so we can focus our efforts on those areas most 'at risk'.
- Where appropriate, as informed by our risk assessment, engage directly with new suppliers in respect of our anti-slavery policy to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
- Our contractual documentation for appropriate suppliers will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy.
- We also make provision for appropriate contracted suppliers to hold their own suppliers to the same standards.
- Our smaller suppliers are our greatest risk in our supply chain for Modern Slavery. These smaller suppliers include commercial real estate services (i.e. cleaning), merchandise suppliers, and office catering. We have commenced reviewing our existing regular smaller suppliers in relation to modern slavery compliance. We are committed to acting on this review, with the intention of uplifting their compliance or changing to new suppliers.

Mantel Group is committed to ensuring adherence to its goal in preventing, detecting and reporting modern slavery in any part of the Mantel Group's supply chain. Mantel Group encourages all those working on the Company's behalf to avoid any activity that might lead to, or suggest, a breach of this commitment.

5. Describe how the reporting entity assesses the effectiveness of these actions

Our People and Culture, Finance and Operations teams monitor the effectiveness of the approach to Modern Slavery.

There were no instances of modern slavery identified in our operations or supply chain during the reporting period.

6. Describe the process of consultation with any entities the reporting entity owns or controls

This statement was prepared in consultation with each entity covered by this report and was endorsed by the Board of Mantel Group Pty Ltd as the ultimate parent entity of the group, at the board meeting held on 18 December 2024.

7. Provide any other relevant information

Mantel Group is a principle based organisation. Our decisions and behaviour are driven by our 5 principles. We believe that this approach enhances our commitment to eliminating Modern Slavery. Particularly through our principles “Make Good Choices” & “Make Things Better”

Make Good Choices

We’re common sense people, good judgement people, gut instinct people. We trust ourselves and each other to make the best decisions for the company, for our clients and the team.

We’re all adults. We honour our commitments, and prioritise our clients. We understand expectations and don’t need a whole lot of rules to tell us how to behave, or when or where to work. Because we’re adults, we’re treated that way.

We’re mature enough to ask our team for help, and we actively and enthusiastically help each other in return.

If we don’t know what to do, we’ll use that common sense and try something else. We might be right (or close enough to right to keep moving forward). We’re ok with being wrong and changing our approach – the process of learning something new helps us make better decisions. We take responsibility for our actions, and if we break things, we fix them.

Processes and plans are important, but not followed blindly – there’s always room for improvement.

Each of us makes it a priority to understand our business, obligations, challenges and clients so we can make good choices.

Make Things Better

We transform things for the better, build enduring relationships, and contribute to our community. We share the things we've learnt and always think about our legacies – on the project, with our client and in our team.

We embrace challenges and adapt our approach as new information comes to light. We learn from experience and use this knowledge to make things better. We remember our past experiences fondly, but there is no place for nostalgia – we are future focused!

We don't walk past things that are wrong or where we could make a difference – we roll up our sleeves and help in the best way we can. We're not bystanders.

We are creating something that matters; that's hard work, but we can make a positive change if we all chip in. We volunteer for the tough stuff.

Our company has been founded to change the way things get done for the better. We are technology pioneers. It's our strength and our challenge – embrace it!

In It Together

We are a people business. Our uniqueness and value come from our people and the meaningful interactions we create within the team, with our clients and theirs.

We genuinely care about our teammates and want the best for everyone. We create a space where we can have a laugh and enjoy our work and working together. We are generous with our time and support.

Supporting one another and our clients is good for people and good for business. Everybody is different, and we know that support means different things to each person and it changes over time. We're going to look after each other, even if it means some short-term pain – we take a long-term view. We've got each other's backs.

We embrace and celebrate each other's originality, uniqueness and authenticity. We value diverse thoughts, perspectives and backgrounds, while also knowing when to present as a united front to clients.

We value humility and substance, and we learn from each other's experiences, knowing that each of us has walked a different path and that will greatly influence our view of the world.

Communicate Directly

Communication is central to everything we do. It is a crucial part of each of our jobs, and we do so directly, not pushed through a hierarchy. We ensure clarity of purpose and understanding of expectations by communicating clearly; multiple times if needed.

We listen to genuinely understand. We are each responsible for our own connections – we need to tell people what is going on, through the best channel available, and seek out information ourselves – “no one told me” is never an excuse.

We speak our minds with respect, compassion and context. We talk directly to each other, using the right communication tool for our message. We have meetings only when they are needed and focus on outcomes.

We have strong opinions, loosely held. We are brave; stating our opinion or case even if it's not the existing consensus view, and we are prepared to change our minds when we learn something new. We are not afraid to disagree with or question each other, we value each other's ideas, and when the decision is made, we respect it. We're better than corporate politics.

Love What You Do & Be Awesome At It

Our people are seriously talented!

We recruit high calibre people who'll thrive in our environment and who know that important things are worth the hard work. We hire people that will enhance our team and who we can learn from – people who inspire us, people who are rare. We look for potential and the drive to be great. We recruit awesome people and then get out of their way to allow them to be their best. This is a brilliant place to work because we trust each other to perform and deliver, and continue to strive for optimum outcomes for our clients and each other. We are self-motivated and driven.

Attracting and recruiting top-notch people is a collective responsibility. Every single role is important, and every single role has the right person in it – for the business, for the team, for the client and for that person to get genuine satisfaction from excelling in their role.