

Modern Slavery Statement 2020



**Anabelle Bits Pty Ltd
T/A ASI Solutions
ABN 40 068 649 972
Revised: 01 December 2020**

Section One: ASI's Modern Slavery Statement

1. ASI Businesses

Anabelle Bits Pty Ltd t/as ASI Solutions (ABN 40 068 649 972) is a business technology and IT solutions provider offering hardware, software, and managed services.

ASI has approximately 150 staff across all business operations across Australia, New Zealand, Croatia and Philippines. ASI Solutions Businesses include the following Companies:

- Anabelle Bits Pty Ltd – T/A ASI Solutions (ASI) and has the following entities trading under it
- BEarena (BEarena Pty Ltd, ABN 53 125 400 062) who provide IT Services to customers in Auckland/Wellington, NZ, ad
- Forward IT (Forward IT Pty Ltd, ABN: 42 597 085 374), who also provide IT Services to customers in Canberra.

This is a joint modern slavery statement prepared by ASI Solutions as the Reporting Entity on behalf of covers BEarena and Forward IT as wholly controlled entities under ASI Solutions. This is in accordance with Section 16 of the Modern Slavery Act of 2020 which outlines the mandatory criteria for reporting in modern slavery statements.

For the purposes of this statement, the terms “ASI Solutions” and “ASI” shall refer to Anabelle Bits Pty Ltd and its group of companies.

2. ASI Commitment

As a family-owned business, ASI prides itself on the reputation it has built within the IT Industry over the last 35 years. With core values that reflect family, integrity and honesty, we support an open and inclusive workplace, where people can speak up freely and with confidence, disclose information in a confidential manner and feel supported without fear of recrimination for genuine disclosures.

As a Leadership group, we endeavour to continually assess and review our operations as it relates to human rights, and will amend or eliminate processes, actions and behaviours that are contradictory to these core values.

We believe that our customers and our people, should be treated with respect and dignity, and we expect our staff to behave ethically and responsibly in accordance with our company policies and to cultivate appropriate business behaviour across the organisation.

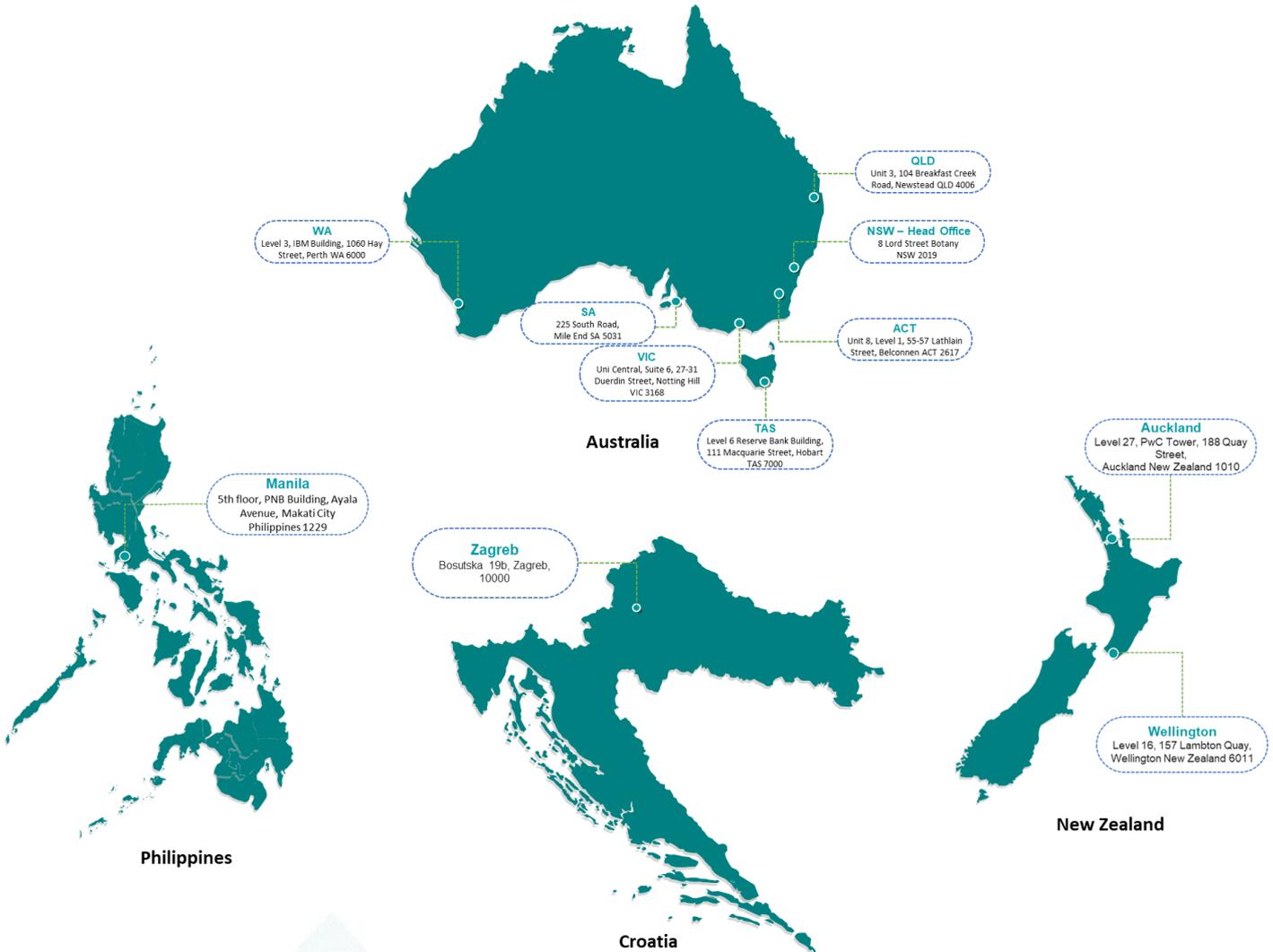
Our Leadership group encourages its staff to undertake annual compliance training, including harassment, discrimination, Equal Employment Opportunity and Modern Slavery are mandatory for all ASI employees.

ASI's Modern Slavery Statement outlines the steps being taken to reflect a commitment to acting ethically and with integrity in all our business dealings and implementing processes to ensure that slavery and human trafficking does not occur within our internal processes and supply chain.

Section Two: Operational Guidelines

1. ASI Locations

ASI offices are based across Australia and New Zealand, as well as in the Philippines and Croatia are indicated below.



ASI warehouses are located at the Head Office in Sydney with secondary storage spaces within each state branch offices.

ASI has outsourced operations based in Zagreb, Croatia, as well as in Manila, Philippines via Business Processing Operators (BPOs). There are approximately 5 staff in Croatia under the Forward IT Service Delivery Team, while 16 staff members in Manila perform roles within the ASI Services, Operations, and HR Departments.

The guidelines below apply to all persons and entities affiliated with ASI Solutions in any capacity, including all suppliers, employees, Directors, agency workers, contractors, consultants, and any other third-party representatives.

2. ASI's Supply Chain and Internal Processes

ASI Solutions regularly purchases goods and services that are required for its business operations. We work with around 30 suppliers in Australia, some of which are from the United Kingdom, China and Germany which provide us with IT Hardware and AV Equipment. These suppliers are engaged on a long-term basis, with most relationships spanning between 5 to 25+ years. Our top suppliers shown below.



ASI regularly engages with and reviews arrangements with its external partners to ensure they have appropriate policies and programs in place to mitigate the risk of modern slavery being present in their supply chains.

By way of formally recognising these arrangements, ASI will engage its external suppliers to survey their operations and record outcomes to ensure compliance across the board. [Supplier Self-assessment Questionnaire \(Annexure A\)](#).

3. ASI People & Culture

Internally, our People & Culture Team ensure all business unit continually self-monitor to minimise the risk of modern slavery practices occurring within our own business operations. Heads of Department consult with the P&C team and as necessary, provide updates on their respective anti-modern slavery efforts to the Executive Team during Executive Meetings. ASI's internal company policies are updated regularly to reflect efforts being taken toward responsible actions in the supply chain and business operations management.

Equally, through best practice HR Operations, ASI ensures fair treatment of its employees by providing a workplace that is inclusive, diverse and provides an environment where its people feel safe and supported in daily business operations, regardless of ethnic origin or background.

At ASI, we pride ourselves on attracting and retaining a talented workforce of people whose personal brands align with the ASI Values, holding each person accountable for their actions and achievements.

This extends to ensuring operational plans executed on behalf of ASI are done so to ensure Modern Slavery does not form part of our daily operations.

Geographical Location	Business operations or raw materials originating from <ul style="list-style-type: none"> • countries that are afflicted by war or conflict • countries with a high incidence of corruption and weak regulation around labour standards
Vulnerable Populations	Employing the following worker categories: <ul style="list-style-type: none"> • migrant workers (individuals working across borders who have temporary or unofficial citizenship in their current location) • base skill workers
Supplier Business Models	Employing third-party labour hire companies resulting to diminished visibility and control over recruitment procedures
Reputational Risk	If penalties or sanctions regarding modern slavery risk have been previously meted out to them.

A supplier will be deemed as high risk if they fall into any one of the risk factors mentioned above. These four factors are reflected on ASI's [Supplier Self-assessment Questionnaire \(Annexure A\)](#).

1. Due Diligence: Suppliers that are deemed as high risk will be asked to provide more comprehensive information on their operations and supply chain for us to understand whether they adhere to ASI policies as well as current relevant legislation against modern slavery.
2. Action Planning: Take the necessary steps to address and/or any potential risks uncovered. These steps may involve further checks on the supplier's legitimacy, level of compliance ability to manage labour rights.
3. Evaluation: Measure the effectiveness of the actions taken.

3.1 Non-Conformance

Any breach of this policy will be taken seriously and will be dealt with in accordance with ASI's grievance and disciplinary policy. As for the ASI supplier network, the Directors have adopted a zero-tolerance stance towards the supplier's behaviour and explore options of preventing further engagement with the supplier or may decide to work with the supplier towards compliance with this policy.

4. Measuring Success

ASI will continue to manage and report on progress against action plans based on a set of indicators to assess the effectiveness of our performance. We will report against the following metrics within the respective timelines as follows:

Action Item	KPI	Completion Date
Policies <ul style="list-style-type: none"> • Annual Review and Update of All ASI Policies incorporating industry best practice and compliance to federal and local regulation 	% policies reviewed	YOY

<p>Workplace Assessment</p> <ul style="list-style-type: none"> • Conduct an initial assessment on working conditions internally as well as those of existing suppliers • Action plans from initial assessment • Follow through on action plans • Yearly workplace assessment + follow through 	<p># internal processes audited # suppliers audited Based on action items identified</p>	<p>31 Mar 2020 30 April 2021 30 Jun 2021 YOY</p>
<p>Modern Slavery Statement</p> <ul style="list-style-type: none"> • Annual review and update ASI's Modern Slavery Statement 	<p>Date of publication</p>	<p>01 Dec 2020 YOY</p>
<p>Procurement Policy</p> <ul style="list-style-type: none"> • Develop and implement a robust Procurement Policy • Cascade to existing suppliers to target compliance within six (6) months of publishing • Annual Review and Update of ASI Procurement Policy 	<p>Date of publication # of suppliers signed off</p>	<p>28 February 2021 01 Mar 2021 YOY</p>
<p>Capability & Awareness Training</p> <ul style="list-style-type: none"> • Regularly deliver compliance training to all staff on Modern Slavery, incorporating feedback from reporting mechanisms and employment surveys • Solicit input from relevant regulatory bodies regarding best practice approach to managing regulatory requirements for Modern Slavery • Embed the behaviours which embrace inclusiveness, fairness and equity for all staff 	<p># of staff trained Quality of feedback from regulatory bodies engaged</p>	<p>Annually 30 pril 2021</p>

5. Reporting Concerns

If an ASI staff member becomes aware of or suspects behaviour that constitutes modern slavery in connection with our business operations or supply chain, they are encouraged to report it immediately to a Director or to a member of the People & Culture Team. All matters will be investigated and dealt with in accordance with the ASI Grievance policy.

6. Approval

This statement was crafted in consultation with key stakeholders of each reporting entity in Anabelle Bits Pty Ltd and its group of companies, and is approved and endorsed by the ASI Executive Committee as its principal governing body on behalf of ASI Solutions as the parent entity, and on behalf of BEarena Pty Ltd and Forward IT Pty Ltd, on 1 December 2020 and covers the financial year 2019 / 2020.

Signed by



Nathan Lowe
Managing Director

Annexure A - Supplier Self-Assessment Questionnaire

This questionnaire is [available online](#).

The following questionnaire asks for a summary of your organisation's approach to various policies that ASI Solutions considers paramount to their operations. You are required to answer "Yes" or "No" and provide further information whenever required. Please ensure that relevant documentation / attachments are sent back with the accomplished questionnaire.

Company Details	Response
Company Information This section asks for basic company information.	
Company Name	<i>Please provide details</i>
Company Address	<i>Please provide details</i>
Company Telephone Number	<i>Please provide details</i>
Company Status (Foreign, Private, Public, Subsidiary, Partnership, Sole Trader)	<i>Please provide details</i>
Date of Formation	<i>Please provide details</i>
Contact Name & Telephone Number	<i>Please provide details</i>
Contact	<i>Please provide details</i>

Vendor Policy & Practice	Response and further details
Diversity & Inclusion ASI expects its suppliers to have in place a policy / procedure relating to diversity and inclusion, ideally focusing on flexible work arrangements, cultural diversity, gender inclusion, and reconciliation of Aboriginal and Torres Strait Islander peoples.	
Does your organisation have policies or similar strategies to create positive changes in the lives of Aboriginal and Torres Strait Islander people? If so, please provide a copy.	<i>yes/no</i>
Do you have policies or similar strategies that focus on gender & cultural diversity, LGBTI inclusion, and those with disabilities or experiencing disadvantage? If so, please provide a copy.	<i>yes/no</i>
Do you have policies (or similar strategies) that allows for flexible work arrangements? If so, please provide a copy.	<i>yes/no</i>

Modern Slavery The 2018 Modern Slavery Act requires ASI Solutions to disclose the steps it has taken to identify and address modern slavery risks in its supply chain. Please confirm what steps you have taken to identify and address modern slavery risks within your own organisation and supply chain by answering the questions below.	
Does your organisation outsource any part of its operations? If so, please state:	<i>yes/no</i>
The nature of the operations outsourced;	<i>Please provide details</i>
The country to which they are outsourced (if outside Australia)	<i>Please provide details</i>
Does your organisation use labour hire companies as part of its operations? If so, please confirm:	<i>yes/no</i>
Do you enforce controls to ensure workers' human rights are protected?	<i>yes/no</i>
Do you ensure that labour hire workers (if applicable) receive the same pay and conditions as direct employees?	<i>yes/no</i>
How many suppliers do you have, what do they do, and where are they based?	<i>yes/no; if Yes, please provide details</i>

Supplier Standards ASI expects its suppliers to abide by the minimum standards set out below. Please advise your compliance on each.	
Relevant business laws Does your organisation comply with all relevant legislation in carrying out your business operations?	<i>yes/no</i>
Third parties/sub-contracting Will you be using third parties or sub-contractors in supplying products and services to ASI? Please provide details if so.	<i>yes/no; Please provide details</i>

<p>Equal Employment Opportunity Do you agree to adhere to the principles of equal employment opportunity in hiring, remuneration and all other aspects of employment, complying with state and federal legislation against discrimination due to characteristics including but not limited to race, gender identity, ethnicity, age, disability, religious or political beliefs, and potential or existing family responsibilities?</p>	yes/no
<p>Wages and Benefits Do you agree to pay employees at least the minimum legal wage of the applicable local jurisdiction, ensuring that all legally mandated benefits, entitlements, entitlements and protections prescribed by local and international laws, are afforded to employees?</p>	yes/no
<p>Working Hours Do you agree to comply with relevant state and federal legislation, Awards and industrial instruments regarding working hours?</p>	yes/no
<p>Forced Labour Do you agree to ensure that there is no forced labour within your business whether within your internal organisation and throughout your wider supply chain?</p>	yes/no
<p>Child Labour Do you agree to refrain from using child labour (defined as any full-time work performed by children less than 5 years of age and comply with the rules in hiring children under 18?</p>	yes/no
<p>Work Health and Safety Do you agree to provide at all times a safe and healthy work environment for all employees, in compliance with health and safety regulations, in order to prevent accidents, injuries, and work-related incidents, including precautions in keeping a COVID-Safe workplace? Please provide details if so.</p>	yes/no; if Yes, please provide details

<p>Workplace Conditions Checklist ASI continuous commitment against modern slavery includes engaging our suppliers and external partners in terms of specific labour management practices that enable modern slavery in the workplace. Please advise whether the conditions below exist in your internal supply chain or in those of your secondary suppliers/vendors.</p>	
<p>Background Check Is a background check part of your organisation's tendering process for new suppliers/contractors?</p>	
<p>Employment of Vulnerable Populations Does your and of your suppliers/vendors employ either directly or via third parties or subcontractors any of the following types of workers: Migrant Workers (those who have temporary or unofficial working rights in Australia), Minority populations, Unskilled workers providing manual labour</p>	yes/no
<p>Location Do you and your suppliers/vendors have operations in locations with non-existent or poor implementation of labour laws as defined by the UN Guiding Principles on Business and Human Rights?</p>	yes/no
<p>Recruitment Fees Are there any hiring fees charged to your and your suppliers' /vendors' workers either up front or via a lending institution?</p>	yes/no
<p>Document Custody Do you and your suppliers/vendors keep custody your staff's personal documents (such as passports) as part of the employment agreement?</p>	yes/no
<p>Informal labour engagements Do you and your suppliers/vendors engage with workers informally, contracting them for work without employment agreements?</p>	yes/no
<p>Pay Do you and your suppliers/vendors keep a record of workers' pay rates, work hours, and actual salary amounts paid?</p>	yes/no
<p>Overtime Is regular overtime required of your and your suppliers'/vendors' workers? Is it within reasonable limits based on the Fair Work Act or other relevant local/federal regulation?</p>	yes/no