



**BRENNAN**  
People first – secure always

# MODERN SLAVERY STATEMENT

*12 December 2024*

This statement is made in accordance with the Modern Slavery Act 2018 (the 'Act').

This is a Modern Slavery statement for the 2023-2024 reporting period by Brennan IT Pty Limited ACN 082 699 367, the reporting entity under the Act, and by its parent Brennan VDI Pty Ltd ACN 125 976 007 and the subsidiaries of Brennan VDI Pty Ltd, listed below (collectively Brennan).

## COMMITMENT

Brennan is committed to a human-centric philosophy of “People First – Secure Always”. This is reflected in Brennan’s culture and its value proposition for customers and also aligns to Brennan’s continuous improvement to meet its responsibilities under the Act.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Structure

Brennan VDI Pty Limited is an Australian privately owned company founded in 1997, which is the parent company of the Brennan Group. Brennan VDI Pty Ltd has (and during the whole of the reporting period, had) the following Australian wholly owned subsidiaries:

- Brennan IT Pty Ltd ACN 082 699 367
- Brennan (Qld) Pty Ltd ACN 112 302 100 (formerly Simient Pty Ltd)
- Brennan Telephony Pty Ltd ACN 059 909 894
- Brennan Voice and Data Pty Ltd ACN 089 435 530
- Clade Solutions Pty Ltd ACN 160 269 894
- Forsythes IT & Communications Pty Ltd ACN 003 412 431
- Forsythes Technology Group Pty Ltd ACN 158 875 873
- Forsythes Technology Pty Ltd ACN 002 850 884
- Superfluid Solutions Pty Ltd ACN 086 427 330
- Dienst Consulting Pty Ltd ACN 158 396 813
- MOQdigital Pty Ltd ACN 112 930 515
- MOQ Pty Limited ACN 050 240 330
- TETRAN Pty Ltd ACN 118 203 857
- Wardy IT Solutions Pty Ltd ACN 634 547 023

This Modern Slavery Statement also addresses operations and modern slavery risks of Brennan's overseas wholly owned subsidiaries, being:

India	Brennan IT (India) Pte Ltd U72300MH2014FTC255 706
New Zealand	Brennan IT NZ Pty Limited NZ Co No 1594702 MOQdigital NZ Ltd NZ Co no 3386076
Singapore	Brennan IT (Singapore) Pte Ltd UEN: 201114581R (non-operating holding company of Brennan IT (India) Pte Ltd)
Sri Lanka	Brennan SL (Private) Ltd NTIN 114 716 928-0000

While this Modern Slavery Statement is for the period ending 30 June 2024, at the time of preparing it the Brennan Group also includes:

- Brennan (SA) Pty Ltd ACN 611 856 583 (formerly Nuago Pty Ltd, acquired 1 July 2024)
- Brennan IT Lanka Private Limited PV 00311716 (incorporated 8 October 2024)

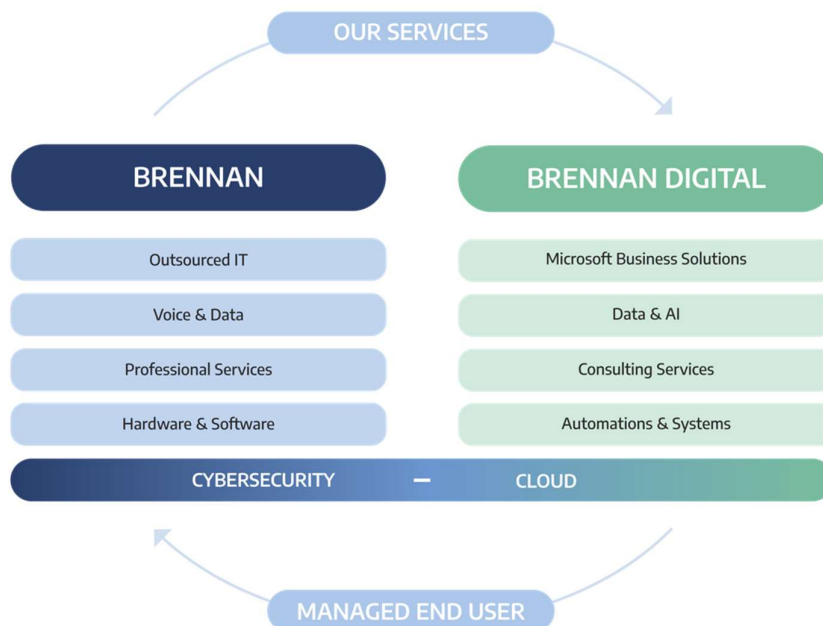
## Operations

Brennan's operations are located in Australia, New Zealand, India and Sri Lanka.



Brennan manages the end-to-end IT environments of its clients spanning hybrid infrastructure, hosting, cloud, networking, unified communications, user and device support, professional service consultants, Data and AI, automation, IT staff placements and augmentation services, project services, and cyber security requirements.

These functions are arranged in two primary service categories, namely the long-standing managed services offering of Brennan and the newer division of Brennan Digital, which brings together transformative digital capabilities.



Brennan's clients are spread across a broad range of industries including healthcare, education, infrastructure, manufacturing, superannuation, insurance and retail within the government, private, and not-for-profit sectors.

Approximately 950 staff are employed by Brennan, with the majority based in Australia. Immediately after the end of the reporting period 2023-2024, Brennan acquired Nuago Pty Limited (now Brennan (SA) Pty Limited), enhancing Brennan's core strengths in its traditional disciplines and industries, while expanding its South Australian presence.

## Supply Chains

Brennan's integrated service offerings leverage 25+ partnerships with respected global and emerging technology software and hardware providers and distributors.

Brennan's supply chain includes over 300 active suppliers of IT services, IT related products and office support such as facilities management, office amenities and office consumables. Brennan's direct suppliers are primarily located in Australia, but many source their products or services or have corporate group head offices overseas.

## MODERN SLAVERY RISKS

### Operations

Brennan’s operations in each of Australia, New Zealand, India and Sri Lanka are subject to local labour laws with which Brennan complies, supported by robust employee policies and procedures. These policies require compliance with local law and adherence to:

- Brennan’s Code of Conduct and its culture reflected in its by-line “People First – Secure Always” and
- Brennan’s core values, two of which are “show you care” and “make it better”.



**ONE TEAM**  
Always aligned to deliver brilliant outcomes



**SHOW YOU CARE**  
Care for each other and the customer, always



**OWN IT**  
Take it on, don’t pass it on – you’ve got this



**MAKE IT BETTER**  
Confront complexity, inside and out

Accordingly, risk of modern slavery within Brennan’s workforce is negligible, as it could manifest only if both:

- one or more employees in a position of trust were guilty of egregious breach of both that trust and multiple corporate policies, and
- all mechanisms for oversight of managers, escalation of concerns, raising of grievances, and whistleblowing were to fail catastrophically.

Geographically, India and Sri Lanka are assessed as relatively higher risk, but still low, given the nature of the Brennan workforce (skilled, white-collar professionals), competitive remuneration, and our stated compliance with local labour laws. Specifically in Sri Lanka, mechanisms are in place to mitigate the impacts of hyperinflation on Brennan employees and their salaries.

### Supply Chains

The Brennan supply chains include a mix of higher to lower risks for modern slavery. Based on Brennan’s analysis of modern slavery risk factors, principally geography and sector, risk is highest in respect of procurement of IT hardware, specifically hardware manufactured in Asia. Sourcing of some supplies to our overseas offices, such as cleaning services and office consumables, also involves relatively higher risks than the Brennan norm.

We acknowledge that we continue to lack visibility in overseas markets of higher tiers in our supply chains but manage this primarily through procuring IT hardware from reputable Australian and international suppliers, with published modern slavery statements and sufficient leverage to require minimum thresholds of social responsibility in their supply chains.

## ACTIONS TO ASSESS AND ADDRESS RISKS OF MODERN SLAVERY

Brennan's culture, core values and employment practices outlined above keep the risk of modern slavery within its workforce negligible.

Brennan's Modern Slavery Policy, which addresses engagement with suppliers about their modern slavery risk profiles and practices, is internally published to all staff and is required reading as part of Australian staff on-boarding. A review to update and strengthen the Modern Slavery Policy commenced in April 2024 and was ongoing at the end of the reporting period. It has since been completed.

Consistently with our Modern Slavery Policy, Procurement Policy and vendor onboarding process, due diligence for new suppliers includes:

- sending modern slavery questionnaires.
- following up and reviewing responses to questionnaires in support of modern slavery risk assessment.

During the reporting period, we introduced a software package which facilitates generation and tracking of questionnaires and responses, to increase the efficiency of information gathering for modern slavery risk assessment.

Brennan has a Vendor Management department that is primarily responsible for supply chain due diligence. The Vendor Management department operates consistently with our Procurement Policy, which provides the overall framework and direction for the sustainable and systematic management and governance of procurement at Brennan, while the Modern Slavery Policy provides more specific direction.

Brennan's vendor onboarding process, supported by flowchart decision-making, is the first point of reference for managing new supplier engagements. This process was updated during Q3 of the reporting period and the update was widely communicated within the Group by Brennan's CFO.

During Q1 of the reporting period, Brennan appointed a General Counsel responsible for promoting regulatory compliance within the Group, who has reviewed Brennan's modern slavery actions and initiated a review of Brennan's modern slavery practices. This has included a comprehensive update of our due diligence questionnaire, completed after the reporting period. Brennan now uses an Ethical Supplier Questionnaire which addresses specific modern slavery risks and other supply chain sustainability issues.

Brennan also has other policies and guidance for employees and statements of commitment, as listed below:

- Code of Conduct
- Anti-bribery and anti-corruption policy
- Sanctions Policy
- Leadership training
- Public commitments to:
  - People First – Secure Always
  - Corporate social responsibility  
<https://www.brennanit.com.au/about-us/corporate-social-responsibility/>

In combination with our corporate values (noted on page 5) and our Modern Slavery and Procurement Policies, these statements of commitment and guidance for all employees reinforce our drive to proactive, responsible, caring ownership of our environments and stakeholders – including those in our supply chains.

### Escalation of concerns for engagement / remediation as needed

Brennan continues to provide avenues for affected employees to safely raise concerns about modern slavery in Brennan's operations and supply chains, including under its Whistle-blower Policy.

The escalation process is expected to bring any potential issues relating to modern slavery in Brennan's supply chains to the attention of sufficiently senior staff within Brennan to facilitate effective engagement about and, as needed, remediation of, conduct that gives rise to or tolerates modern slavery.

## ASSESSING EFFECTIVENESS OF OUR RISK MANAGEMENT

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chains will be an ongoing and evolving process.

To date our effectiveness assessment focuses on changing supplier conduct, including responses to questionnaires and the content of those responses, and our cataloguing of suppliers against their modern slavery risks. During the reporting period we substantially upgraded our modern slavery questionnaire as mentioned above, including to make it more specific to perceived risks.

Qualitative analysis of supplier responses to questionnaires are generally positive with:

- a number of key suppliers undertaking proactive measures to mitigate their modern slavery risk, as reported in their modern slavery statements.
- many suppliers having put policies and protocols in place to address modern slavery risk.

## CONSULTATION & APPROVAL

This statement is made pursuant to sections 13 and 16 of the Act for the reporting period 1 July 2023 to 30 June 2024. It has been made available for review and comment by the Brennan Executive Leadership team and country-heads for each overseas country in which Brennan operates.

Members of the Executive Leadership Team and the operational staff with responsibility for preparing this Modern Slavery statement each have enterprise-wide functions and accountability, across all reporting entities and overseas subsidiaries. Country heads report to the relevant Executive Leadership team members. As such, consultation with all Brennan Group companies about this Modern Slavery Statement is inherent in the drafting and review processes undertaken in preparing this statement.

This statement was approved by Dave Stevens, the Sole Director (the 'Principal Governing Body') of Brennan VDI Pty Limited, the parent company of the Brennan Group and of each Australian subsidiary on 12 December 2024.



David Stevens  
Managing Director  
Brennan Group

12 December 2024

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