

## Modern Slavery Statement

Dialog Pty Ltd ACN 010 089 175

Statement Period: 1 July 2022 to 31 Mar 2023

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### Introduction

- We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains.
- This statement, which is intended to meet the requirements of the Modern Slavery Act 2018 (cth), highlights how we have applied the principles to assess and address modern slavery risks in our operations and supply chains, and the steps taken by Dialog Pty Ltd ACN 010 089 175 and all of its controlled entities (we, us, our) during the financial year ending 31 March 2023 to seek to minimise the risk of modern slavery occurring in our business and supply chains.
- As highlighted during our previous statement, Dialog Group was acquired by NCSI Holdings in April 2022. As part of integration activity, we are aiming to standardise processes and policies across Australia, including Modern Slavery regulation alignment.
- As part of integration activity, Dialog Group has aligned to NCSI Holdings financial year (1April – 31March). This statement provides coverage for the 9-month period from 1July 2022 – 31Mar 2023.

### Our business

- Established in 1979, Dialog Pty Ltd (trading as Dialog Information Technology) is Australia's largest, privately owned information technology professional services organisation. Dialog provides information technology services to corporate and government organisations in a variety of industries using multiple technologies.
- Our Group employs approximately 1,000 information technology professionals working from offices in Adelaide, Brisbane, Canberra, Darwin, Melbourne, Geelong, Sydney and Perth with the majority of employees working in the eastern states of Australia.
- The services we procure are predominantly provided in Australia and New Zealand.

### Organisational structure

- This statement is for Dialog Pty Ltd ACN 010 089 175 and its controlled entities, being:
  - (a) Access Testing Pty Ltd – ACN 069 942 552
  - (b) Catapult BI Pty Ltd – ACN 127 218 482
  - (c) Ice Media Pty Ltd – ACN 065 027 956
  - (d) Innodev Pty Ltd – ACN 127 666 031
  - (e) Scrum Australia Pty Ltd – ACN 160 811 290
- A consultation process with our wholly-owned subsidiary businesses was undertaken to draft this statement. Subsidiaries are controlled by the holding company, Dialog Pty Ltd, and administered under the Group Subsidiary Directorship Policy for the appointment of subsidiary directors.

## Our supply chains

- Our supply chains reflect the service-based nature of our operation. The supply chain relationships include suppliers from the following sectors:
  - (a) information, communications, and technology;
  - (b) professional services, consulting and contracting
  - (c) property services (including facilities management, utilities, cleaning, waste management and security);
  - (d) logistics and correspondence;
  - (e) marketing;
  - (f) print and promotional goods and services;
  - (g) office supplies; and
  - (h) events management.

## Modern Slavery risks in our supply chains

- We seek to engage suppliers with proven values, ethics and business practices, including those related to modern slavery and broader human rights issues.
- In 2022-23, almost all of our Tier One suppliers were based in Australia, with the vast majority of our spend occurring in Australia. The type and duration of our commercial relationships with our Tier One suppliers varies significantly. For example, in some cases we have long-term relationships with our contractors and landlords. In contrast, we also have a range of ad hoc relationship with other suppliers such as venue or event providers.
- We recognise that the expenditure from Tier One suppliers may not be an indicator of supply chain risk. This is because we may also be exposed to modern slavery risks through smaller or once-off procurement, or Tier One suppliers indirectly.
- From July 2022 – March 2023, we did not identify any modern slavery incidents in our operations.

## Modern Slavery risks in our operations

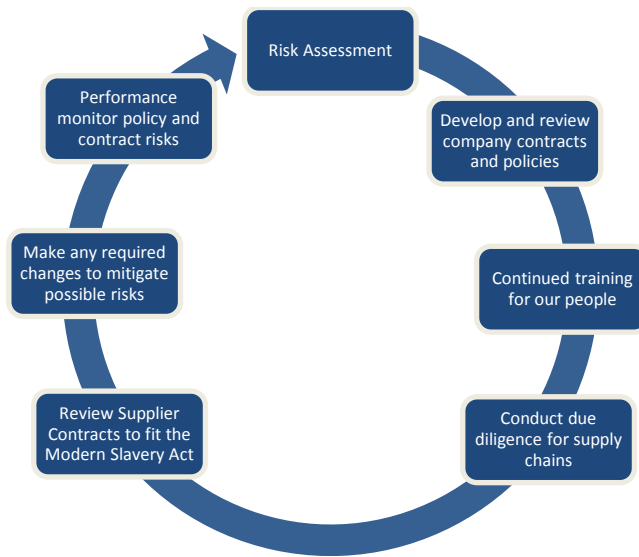
- As an IT consultancy company with a professional workforce, we consider the risk of modern slavery within our direct business operations to be low.
- In 2022, we did not identify any modern slavery incidents in our operations.

## Our policies and actions

- DialogGroup is committed to ensuring high standards of environmental, social and governance performance across its supply chain. This commitment is driven by the same principles that guide Dialog's business: Opportunity, Accountability and Integrity.
- Our effective practices and solutions including Quality Management System (complies with ISO 9001:2015), along with the ongoing due diligence of current and future contracts and in association with the Group's SAGE methodology and systems, will ensure the ongoing effectiveness of the Group's modern slavery risks management.
- In 2022, we reviewed our Supplier Principles to help Dialog uphold its core values with the aim of having supplier relationship that create long-term, sustainable value for our clients, shareholders, community and suppliers.
- As stated in our 2021 and 2022 Statements, we are continually monitoring the group policies including Code of Conduct, Safe and Fair Workplace, Corporate Social Responsibility and Whistleblowing policies. These policies are provided to all employees during their induction and also available to access from our SharePoint. As part of integration with NCSI Holdings, we have also introduced the Singtel [Whistleblower policy](#), which provides an independently managed channel for concerns to be escalated.
- As stated in our Modern Slavery policy, we are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

## Risk assessment practices and solutions

- We have in place systems to:
  - (a) identify and assess potential risk areas in our supply chains;
  - (b) mitigate the risk of slavery occurring in our supply chains;
  - (c) monitor potential risk areas in our supply chains; and
  - (d) protect whistleblowers.
- We adopt the following Risk Assessment Methodology to assess, develop and review supplier contracts to ensure a close fit with the requirement of the Modern Slavery Act.



### Our effectiveness in combating slavery

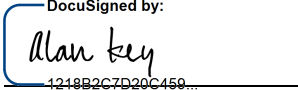
- We recognise that training is the key component of an effective response to modern slavery. That is why we have included the relevant policies in relation to modern slavery and human rights in our induction program.
- We actively engage with our customers by completing the Supplier Assessment Questionnaire and work together to identify possible risks through our supply chains.

### Future commitment

- We understand and recognise the importance of combating modern slavery and are committed to the ongoing due diligence review and assessment of any possible risks in our supply chains and operations.
- We are working to continue to strengthen our approach to assessing effectiveness. We believe the core component of an effective response is to be able to accurately identify, understand and respond to our modern slavery risks.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (Act) and outlines the initiatives implemented to assess, evaluate and address the risks of modern slavery in Dialog Group's business operations and supply chain during the reporting period ending 31 March 2023.

The Board of Directors of Dialog Group Pty Limited approved this modern slavery statement on 14 Sept 2023. This modern slavery statement, in accordance with the Act, has been approved by the Dialog Group's principal governing body and is signed by a responsible member of Dialog Group Pty Limited.

Signature:   
Name: Alan Key  
Title: Director  
Date: 25 October 2023