

Modern Slavery Policy

ABN 95 000 969 362

DICKER
DATA

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1. Overview

1.1 Policy Statement and Purpose

Slavery is a crime and a violation of fundamental human rights. In this modern slavery policy (**Policy**), modern slavery has the meaning given to it in the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**), and includes servitude, forced labour, forced marriage, debt bondage, human trafficking and the worst forms of child labour. Modern slavery ultimately results in the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Dicker Data Limited (ASX:DDR) (**Company, we, us or our**) has a zero-tolerance approach to modern slavery. We are committed to acting ethically in our business dealings by addressing, mitigating and preventing modern slavery in our operations, supply chains and business dealings.

This Policy sets out our commitment to:

- (a) respect human rights and addressing modern slavery;
- (b) responsibly source goods or services to use in our business;
- (c) ensure there is transparency in our approach to tackling modern slavery in our own business and throughout our supply chains;
- (d) take action to prevent, mitigate and where appropriate, remediate the harm caused by modern slavery occurring in our business and supply chains;
- (e) comply with any applicable laws and regulations throughout the world, including but not limited to under the Modern Slavery Act; and
- (f) establish open and effective communication channels for the reporting of actual or suspected instances or risks of modern slavery occurring in our operations and supply chains.

1.2 Supplier requirements

The Company has geographically diverse and wide-ranging supply chains, and at times may operate in regions where the risks of modern slavery are more prevalent than in others. We expect the same high standards from all of our contractors, suppliers, resellers and other business partners within our supply chains.

As part of our onboarding process for suppliers, we strive to require all prospective suppliers to:

- (a) confirm compliance with our Supplier Code of Conduct and this Policy;
- (b) familiarise themselves with all of our policies; and
- (c) comply with this Policy.

We expect our suppliers to also hold their own suppliers to the same high standards.

1.3 Application of this Policy

(a) **Our operations**

This Policy (including any updates) applies to and must be complied with and incorporated into the policies, procedures and operations of our own business and our supply chains.

(b) **Applicable Persons**

This Policy (including any updates) applies to each of the following (**Applicable Persons or you**):

- (i) all persons who work for or on behalf of the Company in any capacity (including employees (at all levels), directors, officers, seconded workers, agency workers, contractors, volunteers, consultants and any other third-party representative); and
- (ii) all of the Company's suppliers and resellers, any person who works for or on behalf of the suppliers or resellers and the suppliers' or resellers' suppliers, vendors, agents, and subcontractors who are involved in its supply chain.

This Policy does not form part of any employee's contract of employment and it does not create any enforceable contractual rights in any employee's favour.

(c) **Application to Group**

Where an Applicable Person has any dealings with any subsidiary of the Company, wherever incorporated (**Subsidiary**):

- (i) that Applicable Person must comply with this Policy in respect of those dealings and its operations (if applicable); and
- (ii) references to "the Company", "we", "us" or "our" in this Policy should be read as being a reference to the relevant Subsidiary.

1.4 Standards of compliance

- (a) In performing its obligations under any agreements or arrangements with the Company, all Applicable Persons must comply with the standards set out in this Policy and all applicable Laws where it operates or is located.
- (b) If there is a conflict or inconsistency between any applicable Laws, the agreement or arrangement, and this Policy, the Company and the Applicable Person must meet the most stringent standard.

1.5 Related documents

You should also review the Company's other relevant policies. These include (but are not limited to), the following:

- (a) Supplier Code of Conduct;
- (b) [Code of Conduct](#); and
- (c) [Whistleblower Policy](#).

2. What is modern slavery?

2.1 Types of modern slavery

Modern slavery generally extends to eight types of serious exploitation of individuals. These include:

Type of exploitation	Further information
Trafficking in persons	The recruitment, harbouring and movement of a person for exploitation through modern slavery.
Slavery	The offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Servitude	The victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
Forced labour	The victim is either not free to stop working or not free to leave their place of work.
Forced marriage	Where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Debt bondage	The victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
The worst forms of child labour	Describes situations where children are: <ul style="list-style-type: none"> exploited through slavery or similar practices, including for sexual exploitation; engaged in hazardous work which may harm their health, safety or morals; or used to produce or traffic drugs.
Deceptive recruiting for labour or services	Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

In Australia, all forms of slavery (including modern slavery) and other slavery or servitude-related practices are outlawed under the Criminal Code Act 1995 (Cth) (**Criminal Code**).

2.2 Risk indicators

The Australian Government's [Official Modern Slavery Act Guidance](#) also sets out the risk indicators which can assist in evaluating whether there is a risk of modern slavery. These include (but are not limited to) the following:

Type of risk	Indicators
Sector and industry risks	<ul style="list-style-type: none"> • Use of unskilled, temporary or seasonal labour. • Use of short-term contracts and outsourcing. • Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night time or in remote locations, such as security or cleaning. • Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours. • Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities. • The sector involves direct engagement with children, including through orphanage tourism and other forms of 'voluntourism' (including through companies' social investment and corporate social responsibility programs).
Product and services risks	<ul style="list-style-type: none"> • Cost requirements or delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size. • The development of the product or delivery of the services has been reported as involving labour exploitation by international organisations or non-governmental organisations (NGOs). • Children are often used in the development of the product or delivery of the service, such as carpet weaving. • The product or components of the product are made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. • The services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. • The product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.
Geographic risks	<ul style="list-style-type: none"> • The country has not ratified international conventions relevant to modern slavery, such as: the International Convention to Suppress the Slave Trade and Slavery (1926); ILO Convention (No. 29) concerning Forced or Compulsory Labour (1930); the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Practices similar to Slavery (1956); the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children (2000); ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999).

	<ul style="list-style-type: none"> • The country is reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations or NGOs. • The country has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards. • Law enforcement agencies are reported to be hostile to workers in at risk industries. • The country forces parts of the population to work for development purposes, for example to assist in construction or agriculture. • The country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability. • The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination.
Entity risks	<ul style="list-style-type: none"> • Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources. • Entity's procurement and sourcing processes appear poorly managed or inefficient. • Entity has complex or opaque supply chains. • Workers appear to have little information about workplace entitlements and protections and there is a general lack of information about workplace standards. • Audit results for the entity appear unreliable or conflict with other sources of information about the supplier, such as NGO reports. • Staff recruitment costs by labour hire companies or recruiters are not covered by the company, meaning that recruitment expenses such as travel may be improperly imposed on workers. • Entity provides residential care for children overseas.

2.3 Indicators of Modern Slavery

Modern slavery may not always be easy to identify. However, there are a number of indicators, and a combination of these signs may indicate that a person is in a situation of modern slavery, and that further investigation may be required.

These types of indicators include where the suspected victim or victims are:

- living at the workplace, or another place owned/controlled by their employer;
- underpaid or not paid at all;
- required to work excessive hours;
- confined or isolated in the workplace or only leave at odd times;
- guarded at work or in their accommodation;
- isolated in remote locations that are difficult to access and/or restricted from contacting or interacting with people outside the workplace (for example, their phones are confiscated, or they are supervised when in public);

- (g) managed by an intermediary or third party who 'holds' or 'invests' their money for them;
- (h) subject to different or less favourable working conditions than other workers because of their country of origin, gender or other factors;
- (i) unable to terminate their employment at any time;
- (j) appear to be servicing a debt to an employer or a third party (such as a recruitment agent);
- (k) appear to be subjected to, or threatened with, violence, emotional, sexual, verbal or physical abuse and/or degrading treatment in connection with their employment;
- (l) appear to be subjected to intimidation, such as threats to their family or close relations in connection with their employment;
- (m) appear to have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party;
- (n) appear to have been deceived about the conditions of their employment;
- (o) are not provided with contracts in a language and format that they can easily understand;
- (p) are not informed of, or do not appear able to understand the terms and conditions of their employment;
- (q) are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices, or refuse to handle known toxic materials or hazards; or
- (r) do not have permission to work because they are from another country or appear to be working in breach of visa requirements.

3. Minimum Modern Slavery Standards

The minimum modern slavery standards that we expect of our own business, employees and supply chain include the following:

- (a) **compliance with modern slavery laws** - compliance with all relevant modern slavery laws throughout the world, including but not limited to the Modern Slavery Act, and Divisions 270 and 271 of the Criminal Code;
- (b) **compliance with other relevant laws** - compliance with other relevant laws throughout the world such as, for example, laws relating to minimum working age, employment conditions and wages;
- (c) **freedom of employment and association** - all workers must have the right to freely choose employment and enjoy freedom of movement and association.
- (d) **safe working conditions** - all workers must have safe and clean working conditions that are without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards; and
- (e) **freedom from discrimination** - all workers shall be treated with dignity and respect, and must be able to work in an environment that is free from discrimination, harassment and abuse.

4. Responsibilities for the Policy

It is important to the Company that employees are aware of the risks of modern slavery and this Policy. Employees must not engage in any activity that would constitute modern slavery or could result in modern slavery practices. Any employee that suspects or is aware of modern slavery occurring in the Company's operations, in a supplier to the Company or in any upstream supplier to that supplier, should report and raise those concerns immediately in accordance with this section 4.

4.1 Board of Directors

The Company's board of directors (**Board**) has the overall responsibility for ensuring that our business, our suppliers and this Policy comply with the Company's legal and ethical obligations in respect of modern slavery.

Our parent company, Dicker Data Limited, is responsible for approving our annual modern slavery statement and ensuring that it complies with applicable laws and regulations throughout the world.

4.2 Modern Slavery Contact Officer

The modern slavery contact officer (**Contact Officer**) has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and dealing with any queries about it. The Contact Officer's responsibilities extend to:

- (a) monitoring and auditing internal controls and procedures, and consulting with relevant stakeholders to identify risks of modern slavery practices in our operations;
- (b) monitoring, auditing and consulting with our contractors and suppliers to identify risks of modern slavery practices in our supply chains;
- (c) developing measures to assess and address any risks of modern slavery, including through due diligence and contractual obligations;
- (d) monitoring the effectiveness of those measures;
- (e) accessing expertise on key issues such as child protection, country or sector specific risks and context specific sensitivities;
- (f) developing appropriate training materials for our employees and suppliers to comply with this Policy; and
- (g) preparing our annual modern slavery statement in accordance with the requirements under applicable laws and regulations, including but not limited to the Modern Slavery Act.

All material instances of actual or suspected modern slavery occurring or having occurred within the operations of the Company, our suppliers, or any other business partner of the Company should immediately be reported to the Contact Officer at the details below.

Name General Counsel

Email legal.support@dickerdata.com.au

4.3 Managers of all levels

Managers of all levels in the Company's operations are responsible for:

- (a) ensuring that all members of their team understand and comply with this Policy and are aware of the indicators of modern slavery;
- (b) identifying actual, or potential, risks of harm as part of their ongoing due diligence processes and developing effective and context appropriate ways to address such risks;
- (c) maintaining a working knowledge of what is happening in their operations and supply chains;
- (d) clearly communicating the Company's minimum standards regarding modern slavery; and
- (e) escalating any reports to the Contact Officer of actual or suspected instances of modern slavery that may be occurring, or any risks of that occurring, within the Company's operations or supply chain.

4.4 Employees

All employees, consultants and contractors (including all managers and any Directors) of the Company are responsible for:

- (a) familiarising themselves with this Policy;
- (b) participating in training in respect of modern slavery;
- (c) complying with this Policy; and
- (d) reporting, in accordance with this Policy, to either:
 - (i) their manager; or
 - (ii) the Contact Officer,

any instances of actual or suspected modern slavery that may be occurring, or there is a risk that it is occurring, within the Company's operations or supply chain.

4.5 Suppliers

Suppliers are responsible for:

- (a) ensuring that their business, employees and suppliers involved in the supply of goods or services to us understand and comply with this Policy; and
- (b) reporting to the Contact Officer of actual or suspected instances of modern slavery that may be occurring, or any risks of that occurring, within its operations or supply chain.

5. Compliance with this Policy

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us (for example, our employees and contractors), on our behalf (for example, our suppliers) or under our control (for example, our subsidiaries). You are required to avoid any activity that might lead to a potential or actual breach of this Policy or any relevant laws making modern slavery an offence throughout the world.

You must notify either your manager or the Contact Officer as soon as possible if you believe or suspect that a breach of this Policy has occurred or may occur in the future. Employees must not attempt to resolve the situation without support from other areas, such as governments or trusted partners, as this may lead to further harm to the victim or victims.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help address coercive or exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within our business or any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Contact Officer.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Contact Officer immediately. If the matter is not remedied and you are an employee of the Company, you should raise it formally either by the process set out in our Whistleblower Policy or to the Contact Officer in accordance with this Policy.

6. Breaches of this Policy

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

We may take a range of actions if we identify a breach, or suspected breach, of a material obligation or principle specified in this Policy. Our response will involve the following:

- (a) **(Internal planning)** senior executives or the Board will convene a meeting to discuss, consider and decide on the following:

- (i) **context** – the severity of the breach, the role of the person or supplier in our operations and supply chains and the likely impact of the breach on our business (if any);
- (ii) **remediation** – whether it is appropriate to work with the person or supplier to implement a performance action plan to remediate that breach; and
- (iii) **rights** – any rights or obligations that we may have, including whether we can terminate the relevant contract or arrangement and whether we are ethically or legally required to report a person or supplier to the appropriate authorities;
- (b) **(Consultation)** we will consult the person or supplier to allow them to respond to the allegation that a breach has occurred, and provide information to us on how they plan to remediate that breach (if possible);
- (c) **(Decision)** the senior executives or Board will convene another meeting and make a formal decision on how Dicker Data will address the breach and what actions to take; and
- (d) **(Execute decision)** senior executives or the Board will ensure that the decision is executed.

Some of the actions that we may take include (but are not limited to), the following:

- (a) **(no action)** if it is determined that the breach is not material, or the allegation is not in fact true, we may take no further action;
- (b) **(training and communication)** we may provide additional training and information in respect of this Policy to the relevant Applicable Person(s);
- (c) **(support remediation)** we may support the relevant Applicable Person(s) in a bespoke remediation or performance improvement action plan;
- (d) **(personnel)** if an employee, contractor or staff member breaches this Policy, that person may face disciplinary action which could ultimately result in dismissal for misconduct or gross misconduct; **(change engagement terms)** seek to amend, or revisit any renewal of, our terms of engagement with relevant Applicable Person(s), to reduce any ongoing or additional risks of instances of modern slavery;
- (e) **(terminate engagement)** we may terminate our engagement with a relevant Applicable Person(s) if they breach this Policy; and
- (f) **(report to authorities)** we may report an Applicable Person who breaches this policy to the relevant authorities.

7. Other relevant information

7.1 Review of this Policy

The Board will review this Policy annually to ensure that it achieves the Policy's purpose and complies with the Company's obligations and strategic objectives.

This Policy may be amended by resolution of the Board. A copy of this Policy will be available on the Company's website and distributed as required or on request.

7.2 Document Management

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