# Modern Slavery Statement

APPROVED BY THE BOARD ON 30 JUNE 2026

ABN 95 000 969 362
Ph: 1800 688 586
238 Captain Cook Drive, Kurnell NSW 2231
www.dickerdata.com.au

# Table of Contents

# FY25 Modern Slavery Statement

## Letter from Executive Chair

Macroeconomic and geopolitical effects on global supply chains persisted throughout 2025, however business confidence began to stabilise across Australia and New Zealand. These included a global shortage of microchips, ongoing conflict in Europe and the Middle East, high inflation rates and various supply chain disruptions. Despite these challenging market conditions, we were able to rely on the strength of our business and people to deliver outstanding results.

I am pleased to present our Modern Slavery Statement (Statement) for our sixth consecutive year of reporting under the Modern Slavery Act 2018 (Cth) (Act), and to reaffirm our commitment to conduct business in an ethical manner.

During the year, we assessed our modern slavery risk within all the facets of our business. As in prior years we engaged FairSupply to undertake a quantitative modern slavery risk assessment based on our suppliers during the 2025 financial year, extending the scope of the review to include potential higher risk suppliers although they represent a materially lower overall spend.

This Statement covers each of the mandatory reporting criteria under the Act, and articulates:

1. how we approach modern slavery risks in our operations and supply chains;
2. the work undertaken during the reporting period to address and mitigate such modern slavery risks; and
3. our ongoing strategies to combat such modern slavery risks.

Fiona Brown

**Fiona Brown**

**Executive Chair & Managing Director**

This statement was approved by the Board of Directors of Dicker Data Limited on 30th June 2026.

# FY25 in review

In FY25, we achieved the following as part of our ongoing modern slavery risk management strategy:

- (**Quantitative risks**) engaged FairSupply to:
    - conduct a quantitative historical analysis of Dicker Data's modern slavery risk profile;
    - categorise Dicker Data's suppliers on an industry and geographic basis for its risk assessment; and
    - re-map and re-assess our comprehensive supply chains using the categorised data;
- (**Grievances and Remediation**) received no reports of actual or suspected instances of modern slavery through any of our whistle blower channels;
- (**Training and Education**)
    - continued to require all staff to complete the modern slavery training module on our ELMO Platform at least once per year, which empowers our staff to understand, identify and report modern slavery and its associated risks; and
    - used internal communication initiatives to reinforce staff awareness of reporting mechanisms for modern slavery concerns; and
- (**Engagement**) engaged and consulted with key personnel across our operations and controlled entities to assess, identify, address and mitigate modern slavery risks.

# Part 1: Structure, operations and supply chains

**Mandatory Criteria One and Two: Identify the reporting entity and describe its structure, operations and supply chains**

## 1.1 Reporting entity

This Modern Slavery Statement is made by Dicker Data Limited ABN 95 000 969 362 (Dicker Data, we, our or us) which is the reporting entity under s5(1) of the Act. The Statement is presented on a consolidated basis by Dicker Data and its controlled entities.

## 1.2 Who we are

Dicker Data is an Australian-owned and operated, ASX-listed distributor of information technology (IT) hardware, software, cloud, access control, surveillance and emerging technology solutions for the corporate and commercial Australia and New Zealand markets with over 46 years of experience.

In FY24, our principal activities were the wholesale distribution of computer hardware, software and related products in Australia and New Zealand. There were no significant changes in the nature of the activities carried out during the year.

With over 12,300 transacting partners who design, configure, deliver, and deploy the technology that we provide, we are a vital link in the value-added technology supply chain. We distribute a wide portfolio of products from world-leading technology vendors including Apple, Cisco, Citrix, Dell, Hewlett Packard Enterprise, HP, Lenovo, Microsoft and other widely known technology brands as sample of which is set out below. We have proven strategies and processes in place to efficiently on-board new brands and to begin delivering a return on investment quickly.

A sampling of the key brands in our supplier base is provided below:

Our resellers operate predominantly within Australia and New Zealand and as such benefit from the strong legislative framework in these jurisdictions in respect of their modern slavery mitigation strategies.

## 1.3 Divisions of Dicker Data

Dicker Data's operations are structured into the following business divisions:

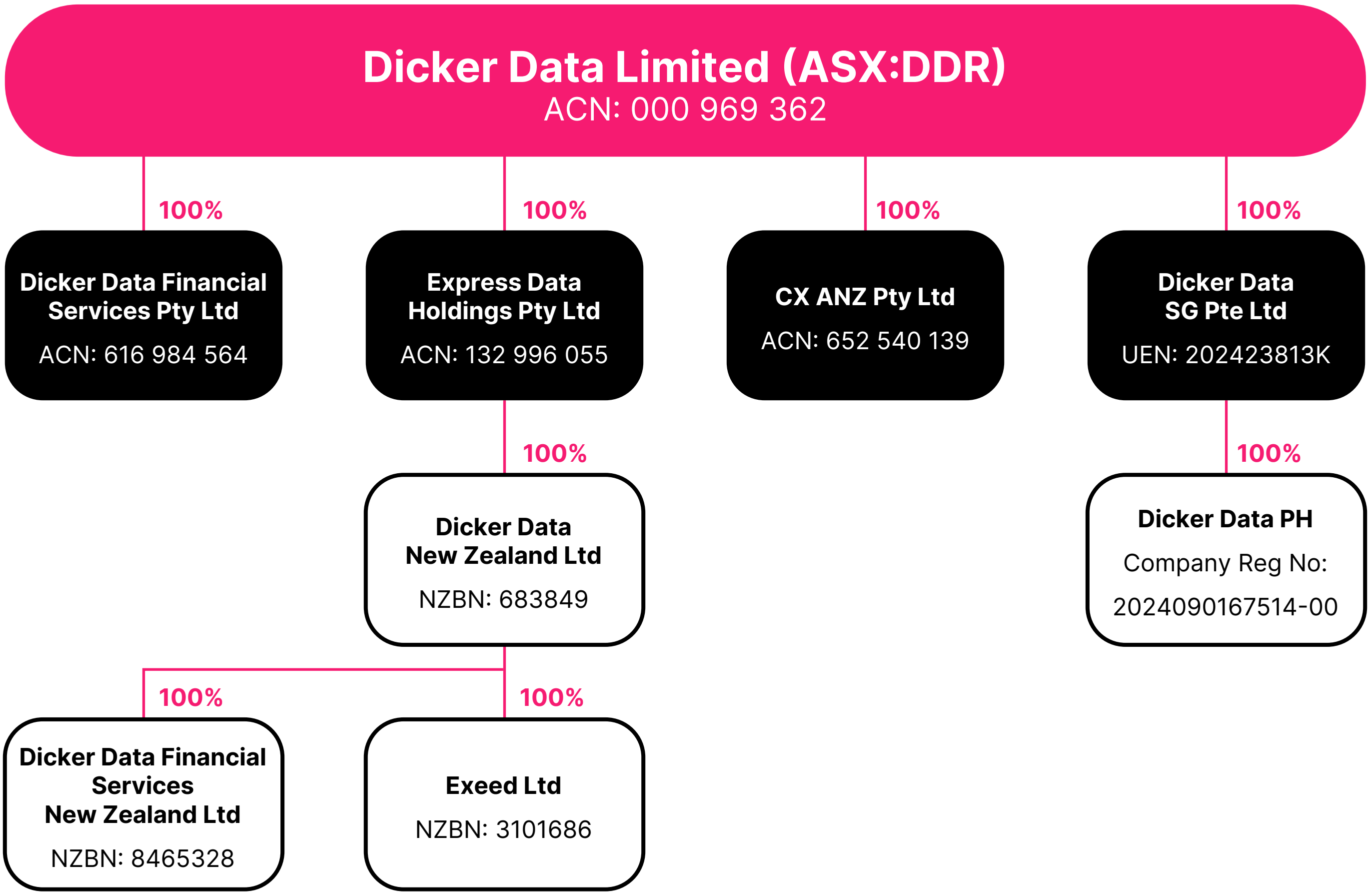
| Division | Description |
|---|---|
| Dicker Data Australia | Wholesale value added distribution in Australia of IT hardware, software, cloud, access control, surveillance and emerging technologies. |
| Dicker Data New Zealand | Wholesale value added distribution in New Zealand of IT hardware, software, cloud, access control, surveillance and emerging technologies. |
| Dicker Data Financial Services | Provision of financial solutions for procurement of IT investments in Australia converting upfront capex into monthly payments. |
| Dicker Data Financial Services NZ | Provision of financial solutions for procurement of IT investments in New Zealand converting upfront capex into monthly payments. |
| Dicker Data Singapore | Holding entity established in Singapore in FY24, that did not trade in FY25. |
| Dicker Data Philippines | Entity established in Philippines in FY24 as wholly owned subsidiary of Dicker Data Singapore, that did not trade in FY25. |

## 1.4 Reporting period

This Statement is for the reporting period of 1 January 2025 to 31 December 2025, which is our financial year most recently completed. In this Statement, FY25 means the financial year ended 31 December 2025 and other financial years are referred to in a corresponding manner.

## 1.5 Corporate Structure

During FY25, the corporate structure of Dicker Data and its subsidiaries (together, the Group) changed slightly, with the deregistration of Exeed Australian Limited Partnership in July 2025. The Group's structure as at the end of FY25 was as follows:




This follows the incorporation of new entities in Singapore and the Philippines in FY24. These entities did not trade during FY25, however staff have been employed in these regions.

For reporting purposes under the Act, each subsidiary is a controlled entity of Dicker Data.

## 1.6 Locations and operations

Dicker Data operates and has physical locations in Australia, New Zealand, Singapore and the Philippines.

We lease eighteen properties in Australia and New Zealand and primarily operate from our headquarters located at 238 Captain Cook Drive, Kurnell NSW 2231, Australia, which is owned by Dicker Data.

## 1.7 Workforce

a. **Size of our workforce**

As at the end of FY25, we had a workforce of 942 persons comprised of 936 employees and 6 contractors in the jurisdictions as noted below:

| Location | Total staff | Permanent employee | Casual employee | Contractors |
|---|---|---|---|---|
| Australia | 721 | 674 | 47 | 0 |
| New Zealand | 210 | 200 | 10 | 0 |
| Philippines | 6 | 1 | 0 | 5 |
| Singapore | 4 | 4 | 0 | 0 |
| China | 1 | 0 | 0 | 1 |
| **Total** | **942** | **879** | **57** | **6** |

The number of Australian and New Zealand employees remained relatively stable in FY25. Our workforce continues to be comprised primarily of people with roles in sales, presales, products, IT, finance, warehouse and marketing. As indicated in the table above, Dicker Data also engaged employees and a number of contractors across Philippines, Singapore and China. Such staff are paid at full market rates, as benchmarked by a recruitment agency.

b. **Employee satisfaction survey**

In FY25, Dicker Data again conducted its annual employee satisfaction and engagement survey on an anonymous basis (FY25 Survey). Some of the key outcomes of the FY25 Survey include the following:

i. 88% of respondents in Australia and 89% of respondents in New Zealand indicated that they believe that staff treat each other with respect; and

ii. 81% of respondents in Australia and 83% of respondents in New Zealand indicated that they are engaged (passionate, motivated and committed) in their role at Dicker Data.

Dicker Data remains committed to engaging our workforce, adjusting our policies to reflect their and the business' needs, and to creating a positive and ethical working environment.

c. **Continuous workforce training**

We also seek to upskill our people and provide them with tools to support their wellbeing. In FY25, Dicker Data continued to provide access to all staff of over 400 courses covering a broad range of topics on the ELMO learning and development platform (ELMO Platform). Dicker Data's Employee Assistance Program provides our staff with access to three confidential sessions with a counsellor to assist them with any mental health concerns and which are wholly funded by Dicker Data.

As part of the onboarding process, all new employees are required to complete and pass the ELMO Platform modules on modern slavery awareness, Work Health and Safety Awareness, Discrimination and Equal Employment Opportunity, Information Disclosures for Corporate Whistleblowers, Workplace Bullying and Occupational Violence, Electronic Communication and Social Media, Privacy Awareness and Sexual and Sex-based Harassment Awareness. Additionally, all current employees are required to complete these modules every year.

## 1.8 Supply chains

In FY25, our supply chains consisted of approximately 1,697 Tier 1 suppliers across Australia and New Zealand business divisions (1,148 in Australia and 549 in New Zealand).

For the purposes of this Statement:

a. **Tier 1 suppliers** are businesses that provide goods and services directly to Dicker Data;

b. **Tier 2 suppliers** are businesses that provide goods and services directly to our Tier 1 suppliers or that contribute directly to the goods and services our Tier 1 suppliers provide to Dicker Data; and

c. **Tier 3 suppliers** are businesses that provide goods and services directly to our Tier 2 suppliers or that contribute directly to the goods and services our Tier 2 suppliers provide to our Tier 1 suppliers, which are then provided to Dicker Data,

   and additional tiers of suppliers have a corresponding meaning. Further details of our suppliers and relationships with our suppliers is set out in Part 2 of this Statement.

# Part 2: Identifying risks of modern slavery practices

**Mandatory Criterion Three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls**

## 2.1 Methodology

a. **Overview**

   For our sixth consecutive year, Dicker Data engaged FairSupply to undertake a review of our exposure to forced labour risks (in the context of modern slavery) in our supply chains. FairSupply then provides us with datapoints that we can utilise to assess our exposure to forced labour risk on a longitudinal study basis, and evaluate our progress in relation to managing that risk on a quantitative basis.

b. **Supply chain mapping**

   In FY25, Dicker Data engaged FairSupply to conduct a whole of supply chain mapping exercise (as conducted in FY24), going beyond our Tier 1 suppliers and providing insight into the probable risk of modern slavery occurring in our comprehensive supply chain through to Tier 10, usually being the source of our supplier's raw inputs. In FY25, FairSupply also undertook separate analyses of supplier data across Dicker Data's Australian and New Zealand operations, in anticipation of likely modern slavery reporting laws coming into effect in New Zealand.

c. **Limitations to the results**

   FairSupply's analysis is limited to forced labour risks (both private and state-imposed). Forced labour risk is the risk that a victim may not be free to stop working or to leave their place of work. Forced labour risk is a subset of modern slavery risk, and does not include the other types of modern slavery risk.

d. **Explaining the metrics**

i. The key metric that FairSupply uses is the estimated number of people in forced labour in our supply chains. This metric is used to assess our forced labour risk by providing a number of estimated forced labourers attributable to:

A. **per $ million procurement spend –** this measure provides the estimated number of people in forced labour relative to each million dollars spent on our procurement activities during FY25.

B. **entire procurement spend** - this is calculated by applying the per $ million procurement spend metric to Dicker Data's total spend data for FY25, and aggregating the estimated number of people in forced labour along the length of our supply chains.

ii. While we have provided the results for both metrics below, the per $ million procurement spend metric is a better indicator of our overall performance, as the entire procurement spend metric is directly correlated to our total procurement spend. Overreliance on the entire procurement spend metric could result in the incorrect perception that simply reducing overall spend will reduce our forced labour risk.

iii. FairSupply has also provided us with the overall results of:

A. the forced labour risk associated with each of our Tier 1 suppliers (which is weighted for annual spend and extends to their full supply chains). FairSupply employs both a numerical risk score and a five-point rating scale (from low to high); and

B. the key risk categories to which our supply chains extend (from Tier 1 through Tier 10).

e. **Explaining FairSupply's process**

FairSupply uses a proprietary algorithm to link Dicker Data's Tier 1 supplier spend data for FY25 with global trade flow data through multi-regional input-output tables (MRIO). FairSupply uses comprehensive supply chain data from over 200 countries, which represents more than 98% of global gross domestic product. The MRIO is regularly updated and drafts information from a number of sources including the Walk Free Foundation's Global Slavery Index, International Labour Organisation's Global Estimates, US government sources and national statistics aggregator agencies across the world (including the Australian Bureau of Statistics).

The MRIO records the different financial transactions between different economic sectors and economic agents (such as households and government) FairSupply then overlays forced labour data to connect spend amount to information about industry, country and sector, and to then generate its forced labour risk metric (across suppliers from Tier 1 to Tier 10).

FairSupply also has proactive supplier due diligence tools, including supplier media report screening and supplier self-assessment questionnaires.

f. **Benefits to engaging FairSupply**

Another benefit to engaging FairSupply is that their analysis provides Dicker Data with information about suppliers beyond those that we have direct contact with. This helps to identify where the risk of forced labour most greatly presents itself and the percentage of our expenditure being represented at that level. In doing so, Dicker Data can better understand if we are potentially causing, contributing to, or are directly linked to, relevant forced labour risk and determine our ability to leverage our relationships with suppliers to direct, negotiate or question purchasing decisions further up our supply chains to lessen or mitigate that risk.

## 2.2 FY25 results – forced labour risk exposure

a. **Supplier risk analysis**

   i. For Dicker Data Australia's suppliers:

      A. FairSupply's analysis of Dicker Data's Tier 1 suppliers, found that 86% of our suppliers were low risk and 14% posed a moderate low risk. 6 of our Tier 1 suppliers were identified as presenting a moderate risk and 2 were identified as presenting a moderate high risk. Upon review, Dicker Data was satisfied that one of these was a once-off customer (rather than a supplier) for a less than $500 transaction and hence can be disregarded for the purposes of the supplier risk analysis. The other supplier had also been identified by Dicker Data last year. Our spend with this other supplier was approximately $260,000. Dicker Data does not consider this supplier to present an ongoing risk exposure, noting that engagement has been discontinued following performance issues unrelated to modern slavery. Pleasingly, none of our Tier 1 suppliers were rated as posing a high risk (as was also the case in FY24); and

      B. across our entire supply chain (i.e. 10+ tiers), these risk ratings were: 69% low, 27% moderate low, 2% moderate, 5 moderate high and 1 high risk supplier. Again, Dicker Data was satisfied that the high-risk supplier identified could be disregarded from this supplier risk analysis as they were a customer. Dicker Data's spend with the suppliers identified as presenting a moderate high risk was less than $10,000 for all except one supplier.

   ii. For Dicker Data New Zealand's suppliers:

      A. FairSupply's analysis of Dicker Data's Tier 1 suppliers, found that 88% of our suppliers were low risk and 12% posed a moderate low risk. None of our tier 1 suppliers were identified as presenting a moderate risk or higher; and

      B. across our entire supply chain, these risk ratings were: 72% low, 27% moderate low and 8 moderate risk suppliers. Again, pleasingly no suppliers were identified as being moderate high or high risk.

b. **Per $ million procurement spend[1]**

During FY25, Dicker Data had exposure to approximately 0.002 people in forced labour per $ million procurement spend across Dicker Data Australia's Tier 1 suppliers, and 0.0169 people in forced labour per $m procurement spend across its entire supply chain (Tier 1 through Tier 10 suppliers). Dicker Data New Zealand had exposure to approximately 0.0023 people in forced labour per $ million procurement spend and across its Tier 1 suppliers, and 0.0167 people in forced labour per $ million procurement spend across its entire supply chain. Whilst year-on-year comparisons with the risk profile of forced labour in Dicker Data's supply chains are difficult, we note that Dicker Data's exposure across its supply chains was 0.0165 in FY24, representing a marginal increase. Dicker Data will continue to monitor its supply chain and notes that this increased risk profile is likely due to the addition of new suppliers. Notwithstanding, Dicker Data notes that this overall exposure risk remains relatively low.

[1] See paragraph 2.1(d)(i)(A) for an explanation of the per $ million procurement spend metric.

c. **Entire procurement spend – Tiers 1 to 10[2]**

Based on Dicker Data's entire FY25 procurement spend, Dicker Data Australia had exposure to approximately 55.6694 people in forced labour across Tier 1 suppliers to Tier 10 suppliers, with this number being 6.6620 when only considering Tier 1 suppliers. For Dicker Data New Zealand's suppliers, Dicker Data had exposure to approximately 9.6542 people in forced labour in Tier

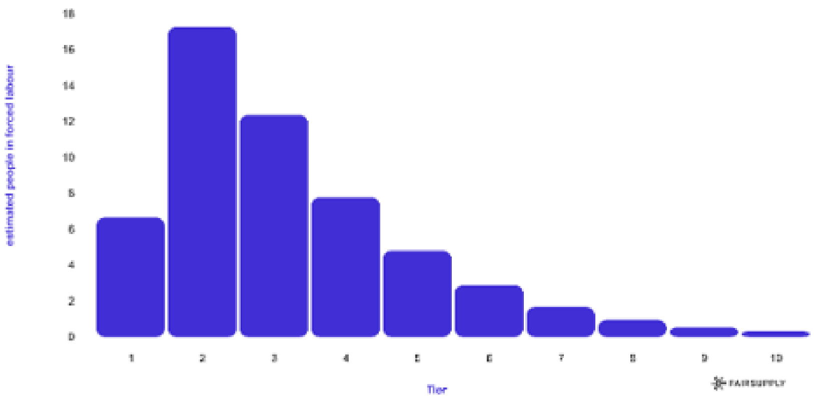
1 suppliers to Tier 10 suppliers, with this number being 1.3237 when only considering Tier 1 suppliers. Subject to the above qualification, when aggregated across Australia and New Zealand, this is up from the result in FY24, at 57.6698 people across all suppliers and 7.085 people across Tier 1 suppliers.

As noted above, this metric is an imperfect measure of our progress to reduce our forced labour risks, as an increase in procurement spend correlates with an increase in total forced labour risk exposure. Dicker Data's total supplier spend increased approximately 11% year on year. Dicker Data will closely monitor the data to understand whether this increased risk profile emanates from industry conditions or particular suppliers.

In FY25, 14 of the 20 highest-risk suppliers identified in FY24 retained their position in the 20 highest-risk suppliers.

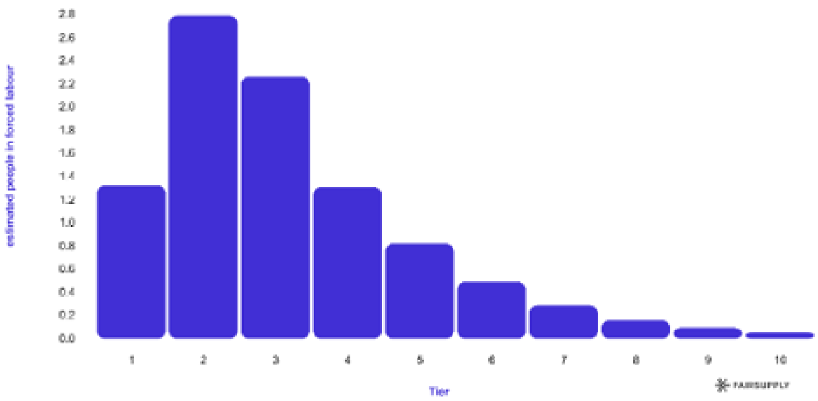
The below graphs depict the FY25 breakdown of the probable number of people working in forced labour or forced labour-like conditions plotted across Dicker Data's Tier 1 suppliers to Tier 10 suppliers.

### Dicker Data Australia




2 See paragraph 2.1(d)(i)(B) for an explanation of the entire procurement spend metric.

### Dicker Data New Zealand




These graphs show that Dicker Data's greatest forced labour risk exposure lies in its suppliers from Tier 2 suppliers and beyond, as was also the case in FY24. This is an expected outcome given the nature of our business and suppliers.

See further Part 4 for an evaluation and analysis on the impact and of these results.

# Supply chain risks

## 2.3 Supply chain risk by jurisdiction

The significant majority of Tier 1 suppliers across our operations are based in Australia and New Zealand. While neither country is immune to modern slavery, their strong regulatory frameworks and focus on human rights significantly reduces the risk of modern slavery occurring in such jurisdictions.

Many other of our Tier 1 suppliers were located in the United States of America (US), United Kingdom (UK) and in various countries in Europe. These countries have similar anti-slavery laws and protections in place, so suppliers operating from these jurisdictions are considered to pose a lower modern slavery risk. According to the Global Slavery Index 2023 (2023 GSI), the UK, Australia and the US rank first, second and fifth (respectively) in terms of governmental response to modern slavery risk, indicating positive steps to combat modern slavery risks in the regions from which we largely procure.

Similar to previous reporting periods, the concentration of our exposure to forced labour risks across our supply chains was most acute in China, representing approximately 21% of risk for Dicker Data Australia and 22% for Dicker Data New Zealand, but also prevalent in Australia and the US. This is notwithstanding that Dicker Data Australia's direct spend in China represented only around ~1.5% of its total procurement spend (however is understandable given that China is a significant global electronics manufacturer). India was again identified as a higher risk jurisdiction. This is notwithstanding that Dicker Data Australia only engaged three (Tier 1) suppliers classified by FairSupply's data as being based in India and Dicker Data New Zealand did not engage any. Indian suppliers again represented about 12% of the total estimate of people in forced labour in Dicker Data Australia's supply chains, and 9% in respect of Dicker Data New Zealand's supply chains.

Notably, approximately 39% of Dicker Data Australia's forced labour risk emanated from jurisdictions in which it has no direct procurement relationships. Across Dicker Data Australia and Dicker Data New Zealand, commonly identified jurisdictions included Vietnam, Indonesia and Brazil. This is likely due to the role these countries play in Tier 2 and further Tiers in respect of raw material extraction, component manufacturing and logistics.

Based on the 2023 GSI:

a. India had a score of 56 (out of 100) for vulnerability for modern slavery, an estimated prevalence of 8 people living in modern slavery for each 1,000 people, and a government response score of 46 out of 100;

b. China had a score of 46 (out of 100) for vulnerability to modern slavery, an estimated prevalence of 4 people living in modern slavey for each 1,000 people, and a government response score of 40 out of 100;

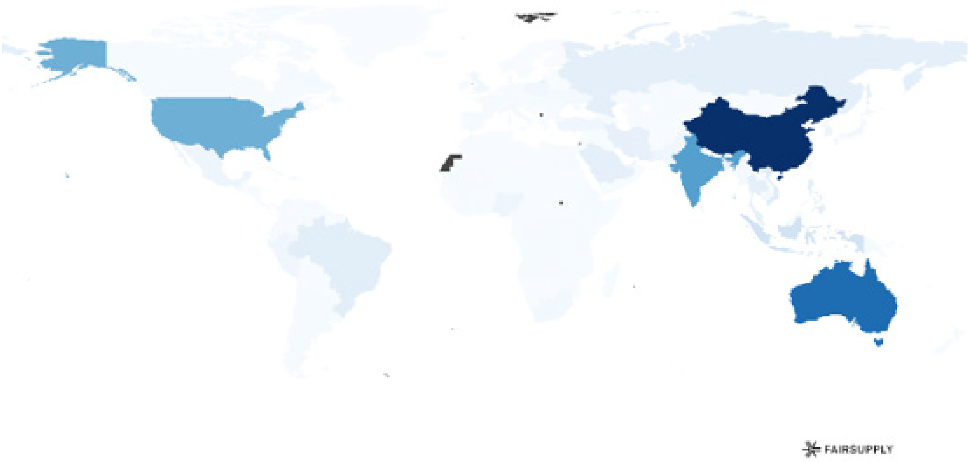
c. US had a score of 25 (out of 100) for vulnerability to modern slavery, an estimated prevalence of 3.3 people living in modern slavery for each 1,000 people, and a government response score of 67 out of 100;

d. New Zealand had a score of 8 (out of 100) for vulnerability to modern slavery, an estimated prevalence of 1.6 people living in modern slavery for each 1,000 people, and a government response score of 54 out of 100; and

e. Australia had a score of 7 (out of 100) for vulnerability to modern slavery, an estimated prevalence of 1.6 people living in modern slavery for each 1,000 people, and a government response score of 67 out of 100.

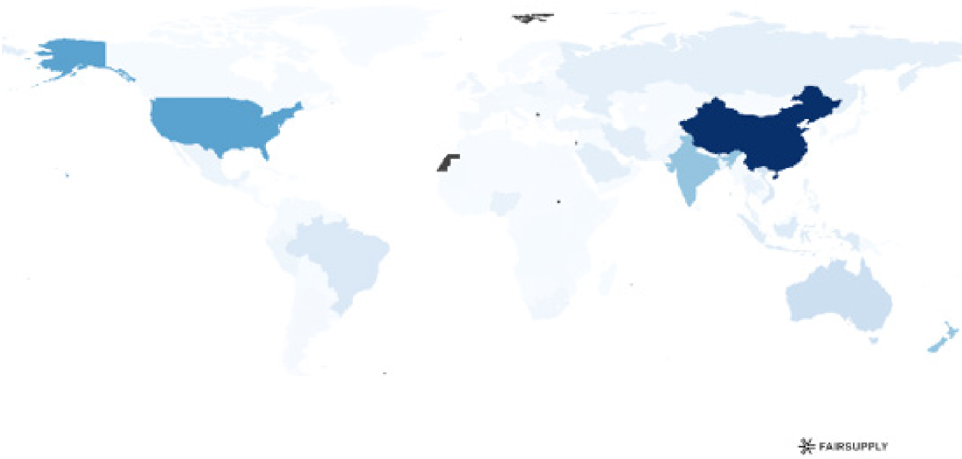
The below graphic shows the countries for which the risk of forced labour occurring in our supply chains is most greatly concentrated. This graphic indicates our forced labour risk across all tiers of suppliers.

### Dicker Data Australia




Note: darker shades of blue represent higher forced labour risk. Dark grey indicates jurisdiction for which there is no data.

### Dicker Data New Zealand

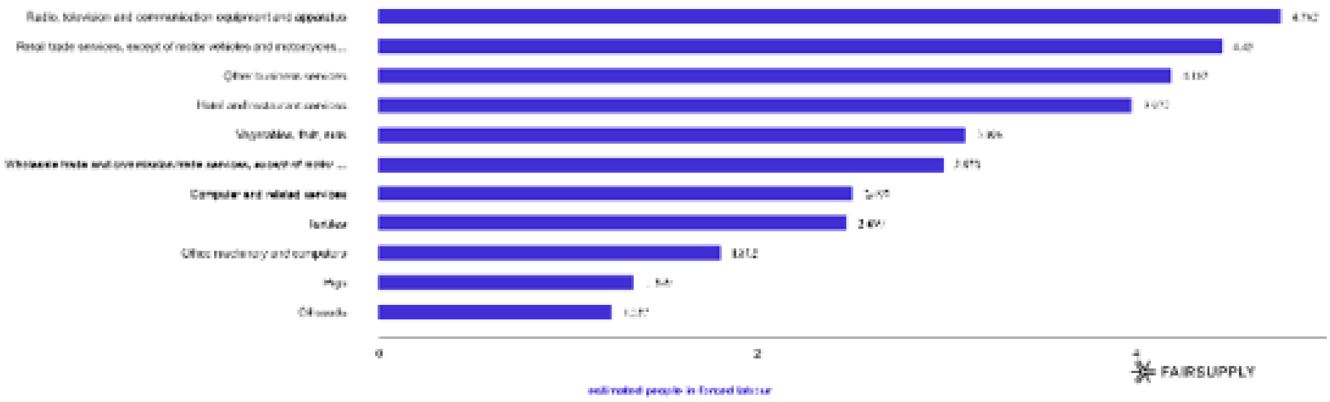



Note: darker shades of blue represent higher forced labour risk. Dark grey indicates jurisdiction for which there is no data.

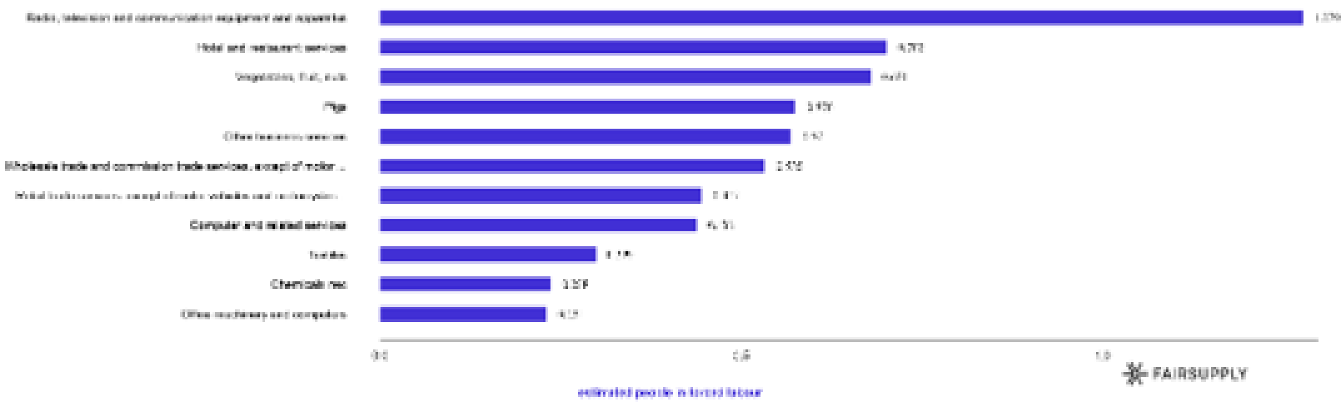
# 2.4 Supply chain risks by industry

The industry in which a particular supplier operates is a significant determining factor in assessing our aggregate forced labour risk exposure. For Dicker Data, the significant sources of industry risk are derived from our procurement of computer hardware and software for distribution in Australia and New Zealand.

For Dicker Data Australia, the top 11 industries that presented a heightened forced labour risk were as follows:




For Dicker Data New Zealand, the top 11 industries identified were similar, with a slight weighting toward agricultural and primary industry risks:




These diagrams are aggregated at the industry rather than supplier level. The numbers are an estimate of the total number of people in forced labour in Dicker Data's infinite supply chains attributable to that industry based on the amount spent by Dicker Data with Tier 1 suppliers in that industry. Each category name is representative of a group of companies that fall within that category.

Dicker Data Australia's top 11 industries were the same industries identified in the top 11 for FY24, with the only change being that "Other business services" was higher than "Hotel and restaurant services" for FY25. "Other business services" is broadly defined and includes any company that supports businesses to deliver their output – e.g. matters varying from accounting, legal and advertising, to provision of outsourced labour, cleaning and waste management. Cleaning and waste management services were specifically flagged by FairSupply as presenting elevated modern slavery risk characteristics due to their typical labour sourcing arrangements.

These industries have modern slavery risk through the manufacturing of components and the sourcing of inputs for their fabrication. Forced labour, debt bondage and child labour are some of the forms of modern slavery that can arise when engaging with these industries due to poor oversight in manufacturing plants and the sourcing of certain minerals for the production of key components. Machinery, electronic equipment and computers require inputs that carry a heightened risk of modern slavery due to the sourcing of key minerals and materials such as cobalt, tungsten, tin, gold, steel, and other resources that are commonly referred to as "conflict resources". With global chip shortages across the world, there was a distinct downward pressure on the supply of necessary inputs, potentially leading to increased modern slavery risk.

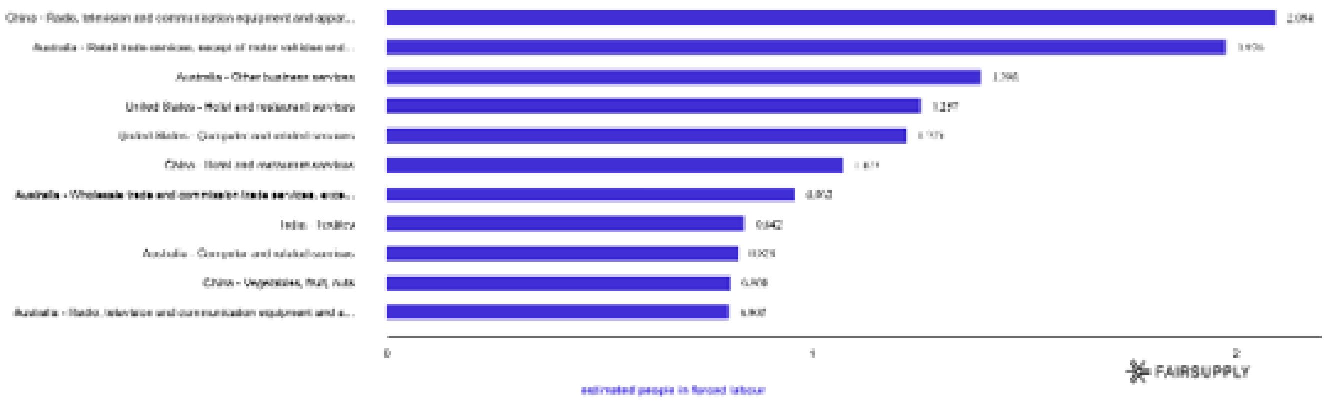
The results of the above analysis demonstrate that a large proportion of our modern slavery risk is characteristic of the industries in which we operate and consistently represent our greatest risk from year to year.

## 2.5 Supply chain risk by sector

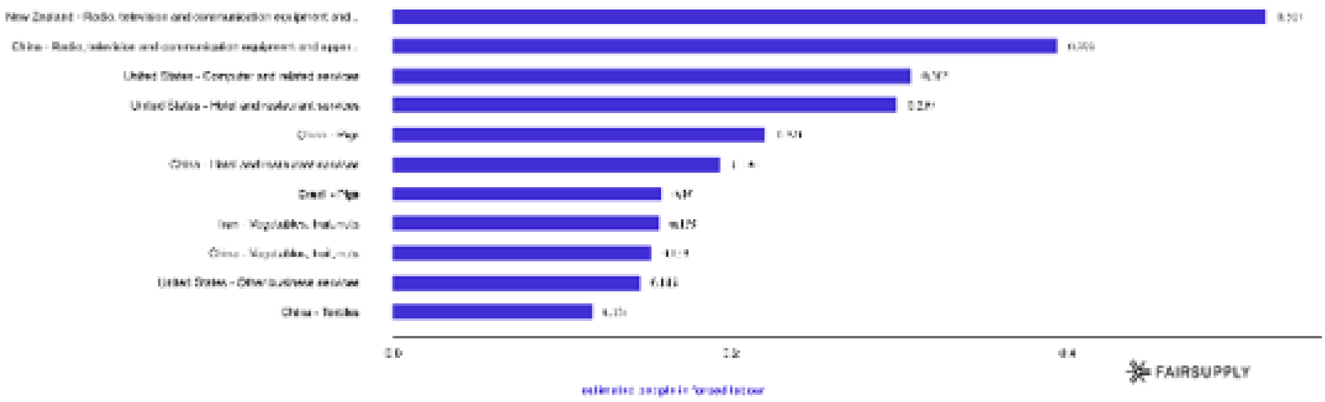
The sector metric utilised by FairSupply, which is an aggregation of the jurisdiction and industry fields, also assists us to assess our aggregate forced labour risk exposure. For Dicker Data, the significant sources of sector risk are primarily derived from our procurement of computer and communication hardware and software for distribution from China, Australia and the US. For Dicker Data Australia, "Other business services" in Australia, and hotel and restaurant services in the US and China, were also noted. For Dicker Data New Zealand, communication hardware in New Zealand was noted rather than in Australia. We expect that this is due to the majority of Dicker Data New Zealand's Tier 1 suppliers being based in New Zealand.

The top 11 sectors that presented a heightened forced labour risk are as follows:

**Dicker Data Australia**




**Dicker Data New Zealand**




These numbers are an estimate of the total number of people in forced labour in Dicker Data's infinite supply chains attributable to that sector based on the amount spent by Dicker Data with Tier 1 suppliers in that industry. Each category name is representative of a group of companies that fall within that category.

## 2.6 Large multinational suppliers

Many of our Tier 1 suppliers are large multinational companies. While Dicker Data is a significant customer, it is not commercially feasible to impose any specific or novel modern slavery-related requirements (such as audits and training requirements) on those suppliers or those suppliers' supply chains. This means that we rely on their own assessment of compliance with the Act and applicable modern slavery laws, which elevates the risk that modern slavery practices are not uncovered or addressed.

## 2.7 Complex and non-transparent supply chains

We rely on inputs from a large number of suppliers across multiple tiers, many of which are located in different countries. It can be difficult to fully map our supply chains particularly where our suppliers rely on their own, often confidential, supply chains.

Where we are a reseller of IT and other products from certain businesses, we often have limited visibility of those business' supply chains and any measures we take may affect the commercial relationship with such businesses.

## 2.8 Suppression of freedom of association

Given the prevalence of unskilled or low skilled labour in the IT product manufacturing process and low barriers to entry, there is an elevated risk that some of our suppliers may engage in activities which suppress workers' rights to form associations or unionise.

## 2.9 Cost pressures through purchasing practices

There are certain purchasing practices which may increase the risk of a supplier participating or being complicit in modern slavery practices such as:

a. the use of employment agencies within supply chains may lead to a loss of transparency and visibility over our suppliers' engagement practices of required human resources; and

b. not placing orders with sufficient lead or production times, which may require a supplier to use forced labour over extended periods to fulfil such orders.

# Part 3: Actions to assess and address risks

**Mandatory Criterion Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes**

## 3.1 Policies and Protocols

A fundamental part of our modern slavery strategy is our approach to corporate governance and management oversight, most readily evidenced by our policies and protocols. These policies and protocols help us embed anti-slavery principles in our company and ensure we mitigate modern slavery risk in a consistent manner in our operations and supply chains. Dicker Data's board of directors (Board) conducts an annual review of our key policies and protocols with our management team.

| Policy | Review date | Further information |
|---|---|---|
| Supplier Code of Conduct | 28 June 2024 | In FY24, Dicker Data implemented a new Supplier Code of Conduct. The purpose of the Supplier Code of Conduct is to provide a clear set of principles and standards to which we expect our suppliers to adhere. It also cross-refers, and clarifies the application of, any other policies with which our suppliers are required to comply.<br><br>The Supplier Code of Conduct is a key part of our ongoing modern slavery risk mitigation strategy. It sets out our expectations that our suppliers act ethically by promoting high standards of integrity, behaviour in accordance with Dicker Data's values, fair dealing practices, compliance with laws, fair employment practices and to deter wrongdoing. Our suppliers will be expected to comply with the Supplier Code of Conduct and to ensure that their suppliers also comply with the substantive provisions.<br><br>Dicker Data has yet to fully implement forwarding of its Supplier Code of Conduct to suppliers on a regular basis in FY25. One reason for this is a perceived lack of negotiating power by Dicker Data in negotiating agreements with suppliers. Dicker Data will consider how it may effectively require suppliers to comply with the Supplier Code of Conduct. |
| Modern Slavery Policy | 28 June 2024 | In FY25, Dicker Data continued to implement its Modern Slavery Policy. This policy applies in respect of Dicker Data's operations and our suppliers.<br><br>The Modern Slavery Policy centralises and clearly states our principles in relation to modern slavery. This includes setting out expectations of staff and suppliers.<br><br>The purpose of the Modern Slavery Policy is to promote widespread understanding of what modern slavery is, assist Dicker Data with effectively and efficiently addressing instances of actual or suspected modern slavery and streamline reporting for future modern slavery statements. |
| Corporate Governance Statement | 27 February 2025 | Dicker Data's Corporate Governance Statement provides our principal corporate governance practices in place for each financial year. We seek to maintain high standards of corporate governance to maximise shareholder value through strategic planning, risk management, transparency, and corporate responsibility.<br><br>In FY25, the Board did not require any substantive changes to be made to the Corporate Governance Statement. |

| Policy | Review date | Further information |
|---|---|---|
| Audit & Risk Management Committee Charter | 26 November 2025 | The Audit and Risk Management Committee Charter outlines the responsibilities of the Committee by the Board of Directors of Dicker Data. The Committee assists the Board to fulfil its statutory, fiduciary and regulatory responsibilities.<br>The Committee is expressly given the responsibility of reporting to the Board on matters relating to ESG risks, including social sustainability risks, and formulating strategies on how to manage such risks.<br>In FY25, the Board did not require any substantive changes to be made to the Audit & Risk Management Committee Charter. |
| Code of Business Conduct | 27 November 2025 | The Dicker Data Code of Business Conduct (Code) sets out our core values, commitments, standards and policies for our business and our people. Endorsed by the Board, the Code applies to all employees of Dicker Data as well as those who act on behalf of, or are associates of Dicker Data.<br>Our Code commits Dicker Data to supporting the United Nations' Universal Declaration of Human Rights and the International Labor Organisation's Fundamental Conventions. The Code requires that employees report if any actual or suspected modern slavery instances or practices are found and to participate in training on modern slavery from time-to-time.<br>In FY25, the Board did not require any substantive changes to be made to the Code of Business Conduct. |
| Whistleblower Policy | 26 November 2025 | We believe that every employee should have the chance to speak up anonymously when they see or suspect conduct not aligned to our corporate values or not in compliance with applicable laws. Our Whistleblower Policy establishes the mechanism by which our staff can freely (and anonymously, if desired) report conduct, or suspected conduct, that goes against the values and standards of Dicker Data. This includes any concerns regarding modern slavery in our operations and supply chains.<br>In FY25, the Board did not require any substantive changes to be made to the Whistleblower Policy. |

## 3.3 Quantitative risk analysis

As in prior financial years, we engaged FairSupply in FY25 to conduct a retrospective quantitative analysis of Dicker Data's forced labour risk exposure. The methodology and results of FairSupply's analysis are described in Part 2 above.

The key themes from FairSupply analysis includes the following:

a. (**Increased risks in Tier 2 and beyond**) The majority of our risk arises in tiers of suppliers beyond our Tier 1 suppliers, limiting our ability to appropriately leverage our relationships to mitigate such risk.

b. (**Geographic risk**) China continues to be the key jurisdiction associated with the highest forced labour risk in our supply chains. India is also a higher risk jurisdiction again in FY25, with one Indian supplier again being categorised as high risk by FairSupply's analysis. Dicker Data will continue to monitor new suppliers from these jurisdictions.

   Consistent with what was observed in FY24, Australia remained the second largest jurisdiction associated with forced labour risk in our supply chains. This is a result of the fact that Australian suppliers constitute the largest proportion of our suppliers (both by number and by value), and that the geographic analysis (see paragraph 2.3) uses the total procurement spend metric. Despite this concentration, we consider the risk of forced labour occurring in our Australian suppliers to be relatively low, particularly given Australia's strong government response scores in the 2023 GSI and the industries in which we operate.

The United States is also one of the highest risk jurisdictions identified, however this again can be explained by the fact that it receives Dicker Data's second largest expenditure, and it is worth noting the strong government response score in the 2023 GSI.

c. (**Effect of expenditure**) The changes in our supplier spend that come with the expansion of Dicker Data over the last five years have significantly altered the forced labour risk profile of our supply chains. However, FairSupply's analysis allows Dicker Data to identify industries and geographic areas with heightened forced labour risk, which can then be addressed appropriately.

## 3.3 Supplier due diligence

Dicker Data again considered exploring implementing new supplier self-assessment questionnaires in FY25, as part of its onboarding and renewal processes, however did not implement this measure.

## 3.5 Education

Dicker Data continued to provide access to our ELMO Platform to all staff in FY25, having first implemented such in FY22. The ELMO Platform provides a centralised training and education resource for all of Dicker Data's staff with over 400 available courses to better equip them with skills and knowledge relating to their career, and it includes a specific module dedicated to modern slavery training.

Our modern slavery training module was formed to provide an appropriate and uniform educational guide to our staff, with the aim to equip them with the requisite knowledge to recognise, report and mitigate any risks or instances of modern slavery within our operations or supply chains. The modern slavery module is compulsory for all staff to complete, both during the onboarding process and annually.

## 3.6 Remediation

Dicker Data does not have a codified remediation action plan that it requires suppliers to undertake if modern slavery or modern slavery risk factors are identified in a supplier's operations or supply chains. The benefit of this approach is that it allows us to work flexibly with suppliers to create favourable and practically achievable outcomes.

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

This may mean that we may take a range of actions if a modern slavery risk or instance (actual or suspected) is identified within a supplier's operations or supply chains. Dicker Data has set out in its Modern Slavery Policy the kind of actions that its response will generally involve, as follows:

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

   i. in relation to that modern slavery risk or instance, its severity, the role of that supplier in our supply chains and its likely impact on our business (if any);

   ii. whether, under the circumstances, it is appropriate to work with the supplier to implement a performance improvement plan to remediate that risk or event, or if the supplier relationship should be terminated; and

   iii. any legal rights or obligations that Dicker Data may have under the circumstances, including whether to report a supplier to the appropriate authorities;

b. (**Supplier consultation**) we would consult the supplier to allow it to respond to the allegation that a modern slavery risk or instance exists in its operations or supply chains, and provide information on how it plans to remediate that risk or instance (if possible);

c. (**Decision**) the senior executives or Board will convene another meeting and make a formal decision on how Dicker Data will deal with the modern slavery risk or instance, and what actions it will take; and

d. (**Execute decision**) senior executives or the Board will ensure that its decision is executed in relation to that supplier and the modern slavery risk or instance, in whatever form is decided.

In FY25, no actual or suspected instances of modern slavery were found or reported in Dicker Data's supply chains.

# Part 4: Assessing the effectiveness of our actions

**Mandatory Criterion Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks**

## 4.1 Overview

In FY25, Dicker Data did not uncover any instances of modern slavery in its operations or in any of its supply chains.

## 4.2 Quantitative modern slavery risk analysis

Dicker Data engaged FairSupply to conduct a historical quantitative analysis of forced labour risk based on our suppliers and our entire procurement spend for FY25. This analysis provides objective metrics by which we can measure our success in mitigating forced labour in our supply chains.

Some of the key themes emerging from this analysis includes the following:

a. **Reactive and limited risk assessment**

While FairSupply's quantitative analysis provides useful information on Dicker Data's forced labour risk exposure, its key shortcomings include:

i. being reactive and not allowing Dicker Data to track and proactively manage its modern slavery risk exposure in real time; and

ii. the analysis is limited to tracking the risk of forced labour occurring in our supply chains (and does not address other forms of modern slavery).

b. **Geographic risk concentration**

In FY25, China and India continued to be prominent jurisdictions in which Dicker Data had a higher risk of forced labour occurring in its supply chains. This is notwithstanding that Dicker Data's direct expenditure in these jurisdictions collectively represented less than 2% of our total procurement expenditure.

Again, Australia and the United States were also flagged as jurisdictions presenting a higher risk of forced labour occurring in Dicker Data's supply chains. Considering the high government response scores and strong regulatory environments in both of these jurisdictions, we consider the risk of forced labour and other types of modern slavery occurring to be low. In FY26, we will explore more comprehensive ways in which the risk of modern slavery occurring in Australia can be identified and addressed. The estimated percentage of people in forced labour in Dicker Data's supply chain across these four jurisdictions was fairly stable between FY24 and FY25.

c. **Common suppliers / industries**

In FY25, 14 of the 20 highest-risk suppliers identified in FY24 retained their position in the 20 highest-risk suppliers. Dicker Data had aggregate procurement expenditure of less than $5,000 for approximately half of these suppliers, noting some of these are likely to be one-off transactions. Dicker Data also notes that a number of suppliers flagged as higher risk are large organisations with products and services that are critical to Dicker Data's business. As a result, Dicker Data has limited power to replace them with alternative suppliers or request that they change their practices or their own supply chains.

Similarly, the top 11 industries that presented a heightened forced labour risk for Dicker Data Australia were the same as in FY24, and were largely expected as they related to procurement of computer hardware and software. Dicker Data flagged to FairSupply prior to its analysis that it was particularly interested in the results for the "Other business services" industry. While the risk for this industry did increase slightly in FY25, it could largely be correlated to the increase in overall supplier spend.

## 4.3 Modern slavery risks in Dicker Data's operations

We consider the following factors reduce the risk of modern slavery occurring in our operations:

a. our employees are experienced and highly skilled specialists in their respective fields;

b. strong regulatory and legislative labour law frameworks within Australia and New Zealand, including under the Fair Work Act 2009 (Cth);

c. robust screening, onboarding and continuous oversight of employees by our People and Culture Committee (as governed by the Dicker Data People and Culture Committee Charter) and the executive team;

d. all of Dicker Data's staff are required to act in an ethical and professional manner, as specified in our Code of Business Conduct, internal policies and employee handbook;

e. Dicker Data has implemented a Modern Slavery Policy to set out expectations of staff and suppliers, and promote widespread understanding of what modern slavery is among them;

f. all of Dicker Data's staff are required to complete the modern slavery training module every year on the ELMO Platform; and

g. our internal operations contain appropriate controls and oversight to ensure that employees are properly remunerated for their work.

We consider that the above measures, safeguards and systems are sufficient to manage Dicker Data's modern slavery risks within its internal operations in Australia and New Zealand.

## 4.4 Annual review by our Board

Dicker Data's board and senior management conduct annual reviews of its modern slavery risk mitigation strategy and implementation. These include:

a. an annual review of all of Dicker Data's policies;

b. a holistic review of our strategy when preparing Dicker Data's annual modern slavery statement;

c. a specific review of our quantitative modern slavery risk in consultation with FairSupply (when preparing our retrospective modern slavery risk analysis); and

d. ad hoc reviews as new risks or issues arise.

## 4.5 Grievance mechanisms

In FY25, Dicker Data continued to make the following grievance mechanisms available to its staff and internal operations:

a. **Whistleblower reporting** – in accordance with Dicker Data's Whistleblower Policy, staff may confidentially (and without retaliation) report any actual or suspected instances, or risks, of modern slavery. A variety of reporting channels are available to staff, including by email to whistleblower@dickerdata.com.au, a secure postbox located within Dicker Data's premises and by speaking directly to any manager or leader within Dicker Data's operations.

b. **Employee Handbook** – Dicker Data's employee handbook contains the following information:

i. it confirms that any whistleblower channel can be used to report actual or suspected instances of modern slavery;

ii. our respectful behaviour policy; and

iii. a grievance mechanism by which any staff member can raise complaints relating to modern slavery or any other relevant matter.

In FY25, Dicker Data did not receive any reports of actual or suspected instances of Modern Slavery in its operations or supply chains through any whistleblower channels.

Our current strategy in respect of grievance mechanisms does not account for the inherent shortcomings of having to self-report instances of actual or suspected modern slavery. While our Whistleblower Policy is published on our website and made publicly available, the grievance reporting mechanisms are not available to our suppliers or their staff.  The current scope of this Policy is limited to our internal operations.

## 4.6 Other measures

Dicker Data continues to consider its broader ESG goals, and how its current modern slavery strategy assists in the achievement of these goals. In FY24, Dicker Data introduced sustainability reporting as part of its annual report, in preparation for climate reporting in accordance with the AASB requirements, and continued to report on this in FY25. Dicker Data is a Group 1 reporting entity, and prepared an audited sustainability report in accordance with Australian Sustainability Reporting Standards.

Dicker Data will consider implementing new supplier self-assessment questionnaires in FY26, as part of its onboarding and renewal processes. Dicker Data will also explore the potential to use automated supplier due diligence tools, including modern slavery questionnaires. Dicker Data's priority would be to focus on due diligence of its higher risk and spend suppliers based on FairSupply's prior risk assessments. This data could feed into additional key performance indicators that Dicker Data may consider introducing, to measure the effectiveness of its actions in identifying and addressing modern slavery practices.

# Part 5: Consultation with controlled entities

**Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls**

## 5.1 Consultation Process

As Dicker Data continues to grow, so too does the need to ensure that we maintain a unified response to address modern slavery risks across our operations and supply chains. We recognise that each of our controlled entities have an integral role in ensuring a consistent group-wide approach to the risk of modern slavery and as such, we have implemented a number of initiatives to ensure a holistic and uniform approach to modern slavery.

While Dicker Data and its Subsidiaries are centrally managed from our headquarters at 238 Captain Cook Drive, Kurnell NSW 2231, Australia, our operations are structured into the following 4 distinct business divisions:

- Dicker Data Australia;
- Dicker Data New Zealand;
- Dicker Data Financial Services; and
- Dicker Data Financial Services NZ.

Whilst these divisions are run as separate businesses, the strategy and direction for all companies are set by Dicker Data's Board, and these entities largely share the same directors.

As mentioned at section 1.3 above, Dicker Data Singapore and Dicker Data Philippines were established in FY24, however did not trade during FY25 (although staff are now employed in those regions).

During the course of FY25, we undertook consultation with our controlled entities and business divisions as follows:

a. strategic meetings between the Board, key executives and key staff and stakeholders across our business divisions to ensure that our strategy and requirements are consistently applied across Dicker Data's business;

b. our policies and procedures apply equally to all of Dicker Data's business divisions, and ensures a consistent approach to addressing modern slavery risks; and

c. completing the modern slavery training module is a mandatory annual process for all of Dicker Data's staff, which helps to ensure that our staff have a sufficient minimum understanding of modern slavery risks and facilitates a uniform approach to addressing modern slavery risks.

# Part 6: Other relevant information

**Mandatory Criterion Seven: Any other relevant information**

## 6.1 Operations

Dicker Data expects that changes in the supply chains of IT-related hardware will lead to a shift in market demand and pricing of our goods. Dicker Data also had significant exposure to adverse macroeconomic factors, which include:

a. high inflation and interest rates;

b. depressed levels of business and consumer confidence, although business confidence began to stabilise in Australia and New Zealand in FY25;

c. fluctuating foreign exchange rates; and

d. lingering supply challenges which started or became acute during the COVID-19 pandemic.

As a result of these conditions, Dicker Data will be required to undertake a more disciplined approach to our investments and expenditure to ensure our ongoing profitability. However, Dicker Data is also committed to maintaining our focus on identifying and mitigating modern slavery risks in our supply chains and achieving our overall sustainability goals.

## 6.2 Challenges in our supply chains

In FY25, Dicker Data continued to face certain challenges in its supply chains. These challenges included:

In FY24, Dicker Data continued to face certain challenges in its supply chains. These challenges included:

a. a global shortage on the supply of computer microchips (and increased associated costs);

b. lingering supply challenges which started or became acute during the COVID-19 pandemic, such as delayed deliveries and inflated transportation costs; and

c. increased prices of fuel, certain raw materials and disrupted supply chains due to ongoing geopolitical instabilities in Europe, Asia and the Middle East.

During the course of FY25, some of our supply delays and backlogged orders again continued to subside (having started to do so in FY23), but the challenges remain, particularly in respect of supply chain shortages for microchips (due to factors such as increased investments in AI).

## 6.3 FY26 and beyond

We will continue to comprehensively analyse our operations and supply chains with support from industry experts and technology providers to better understand our sources of modern slavery risk and formulate appropriate strategies to effectively address and mitigate such risks.

Dicker Data's board considers that our economic performance is tied to our ongoing sustainability and anti-slavery commitments, and that such goals are not mutually exclusive. As such, we continue to improve our approach to sustainability, ethical behaviour and corporate social responsibility, including with respect to modern slavery risk.

For future reporting periods, we plan to focus on the following specific issues as part of our commitment to continually improving our capacity for effective modern slavery risk identification and mitigation:

a. we will engage FairSupply (or other independent provider) to prepare a retrospective analysis of forced labour risk in our supply chains;

b. we will continue to improve the implementation of our supplier code of conduct;

c. we will continue to mandate that all staff complete the annual modern slavery training module on the ELMO Platform, and update that module if required;

d. we will investigate, develop and implement (as appropriate) grievance channels for our Tier 1 suppliers, including by providing access to those channels in other languages; and

e. we will investigate whether, and if so, how we can map further tiers of our supply chains, with a focus on Tier 2 suppliers and Tier 3 suppliers.

## Document Management

| Revision Date | Nature of Amendments |
|---|---|
| 30 June 2026 | FY24 Modern Slavery Statement approved by the Board |
| 09 July 2025 | FY24 Modern Slavery Statement approved by the Board |
| 28 June 2024 | FY23 Modern Slavery Statement approved by the Board |
| 28 June 2023 | FY22 Modern Slavery Statement approved by the Board |
| 29 June 2022 | FY21 Modern Slavery Statement approved by the Board |
| 01 June 2021 | FY20 Modern Slavery Statement approved by the Board |