



# MODERN SLAVERY STATEMENT

*21 December 2022*

## INTRODUCTION

The Modern Slavery Act 2018 ('Act') commenced operation on 1 January 2019. The Act aims to combat modern slavery in global supply chains. The United Nations and Walk Free Foundation estimate there are approximately 40 million victims of modern slavery around the world. The Act creates reporting obligations for Brennan (defined in Structure below) including producing an annual Modern Slavery Statement ('Statement') and examining modern slavery risks within Brennan's supply chain.

## COMMITMENT

This statement is made pursuant to sections 14 and 16 of the Act and outlines the steps Brennan is taking to ensure modern slavery and human trafficking does not form part of its organisation or supply chain. Brennan is committed to continuous improvement to meet its responsibilities under the Act.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Brennan adheres to high ethical standards which are at the centre of its operations. Decisions and processes in its supply chain are made with careful consideration of these ethical standards. As such, Brennan aims to partner with people and companies that align with these standards.

### Structure

This statement covers the activities of Brennan VDI Pty Ltd (the 'Reporting Entity') and its subsidiaries ('Brennan') as listed below:

- Brennan IT Pty Ltd
- Brennan Voice and Data Pty Ltd
- Brennan Telephony Pty Ltd
- Superfluid Solutions Pty Ltd
- Brennan IT (Singapore) Pte Ltd



- Brennan IT (India) Pte Ltd
- Brennan IT NZ Pty Limited
- Forsythes Technology Group Pty Ltd
- Forsythes Technology Pty Ltd
- Forsythes IT & Communications Pty Ltd
- Clade Solutions Pty Ltd (acquired in January 2022)
- Simient Pty Ltd (acquired in January 2022)
- MOQ Limited (acquired in November 2022)
- MOQdigital Pty Ltd (acquired in November 2022)
- TETRAN Pty Ltd (acquired in November 2022)
- MOQdigital NZ Ltd (acquired in November 2022)
- Brennan SL (Private) Ltd (formerly MOQdigital Asia Pacific (Private) Ltd - acquired in November 2022)
- Wardy IT Solutions Pty Ltd (acquired in November 2022)
- Dienst Consulting Pty Ltd (acquired in November 2022)

### Direct Operations

Brennan is an Australian privately owned company founded in 1997 with operations located in Australia, New Zealand, India, Sri Lanka and the Philippines. 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, project services, and cyber security requirements. Brennan's clients are spread across a broad range of industries including healthcare, manufacturing, superannuation, and retail. Brennan's direct workforce comprises over 1000 employees with the majority based in Australia. In 2022, Brennan completed the acquisitions of Clade and MOQ and their respective subsidiaries, which specialise in the same disciplines and industries as Brennan.

### Supply Chain

Brennan's supply chain consists of engaging IT service providers, procurement of IT related products and office related costs such as facilities management, office amenities and office consumables. Brennan has over 600 active suppliers. These suppliers are primarily located in Australia.

## RISK MANAGEMENT

### Direct Operations

Brennan operates in a regulated environment and has robust employee policies and procedures in place. As part of Brennan's ISO 27001 certification, employment controls including right-to-work, are tested and confirmed by third party auditors. Brennan's employees are primarily skilled white-collar professionals and are considered lower risk for modern slavery. Brennan's employees are based in Australia, New Zealand, India, Sri Lanka and the Philippines. Geographically, India, Sri Lanka and the Philippines are considered higher risk, however, given the nature of the work (white-collar professionals), remuneration packages in



excess of market rates and compliance with local labour laws, modern slavery is not considered to be a high risk. Specifically in Sri Lanka, mechanisms are in place to mitigate the impacts of hyperinflation on Brennan employees and their salaries.

### Supply Chain

Brennan has assessed its supply chain and overall considers there to be minor areas of risk. Based on Brennan’s analysis of modern slavery risk factors, principally geography and sector, risk is limited to Brennan’s procurement of IT hardware, specifically hardware manufactured in Asia. We acknowledge that we continue to lack visibility in overseas markets of secondary levels of our chain of suppliers and source materials used in our group’s goods and services. This risk is mitigated by Brennan’s procurement of IT hardware from reputable Australian and international suppliers, as well as a review of such suppliers’ publicly available modern slavery statements.

### DUE DILIGENCE

Brennan is committed to ensuring that its operation and supply chain is free of any human rights violation and where potential risks are identified, that these are quickly addressed.

The appropriate action will depend on whether Brennan has caused the impact, contributed to the impact, or is linked to the impact through its business relationships. In instances where Brennan has caused the impact, actions will be taken to cease or prevent the risk. In instances where Brennan has contributed to the impact or is linked to the impact through our business relationships, Brennan will act and leverage our position to mitigate the remaining risk as much as possible.

### Direct Operations

Brennan has policies and guidance for employees including, but not limited to:

- Modern slavery policy
- Whistle-blower policy
- Employee code of conduct
- Leadership Training
- Corporate social responsibility policy
- Anti-bribery and anti-corruption policy

### Supply Chain

The due diligence includes an ongoing review of all active suppliers. The review involved the following steps:

1. Classification of all suppliers into three risk categories – higher risk, medium and lower risk. Factors considered in risk classification included geographical location, sector and probability of continued use or re-engagement;



2. Online search of higher risk suppliers for relevant modern slavery statements and disclosures; and
3. As part of Brennan’s commitment to raising awareness of modern slavery across its supply chain, suppliers across all risk categories (weighted more heavily to higher risk suppliers) were sent a Brennan questionnaire requesting information on their compliance within the requirements of the Act

The above steps were also performed for the newly acquired entities in order to obtain an understanding of each company’s supply chain and ensure compliance with Brennan standards. No additional risks were identified, with the exception of countries that Brennan has not previously operated in, which is outlined in the Risk Management section.

Brennan continues to follow up for responses to the questionnaire and to qualitatively evaluate the level of risk associated with each supplier. Brennan has also revised and refined its supplier code of conduct to include an expectation of assistance from suppliers to enable Brennan to assess if the supplier is compliant with the Act, and therefore suitable for Brennan to engage with.

## GRIEVANCE & REMEDIATION

Brennan continues to provide avenues for affected employees to safely raise concerns about modern slavery in Brennan’s operations and supply chain. As Brennan’s approach to modern slavery develops there is an increasing probability that it will encounter modern slavery in its supply chain. Brennan continues to monitor and, where applicable, respond to potential modern slavery incidents. No grievances were raised in the reporting period.

## ASSESSING EFFECTIVENESS OF OUR RISK MANAGEMENT

The effectiveness of the modern slavery process is measured by several key metrics. 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 chain will be an ongoing and evolving process that we are committed to continue to build upon. We actively review and assess the effectiveness of our approach to inform our path forward.

### Direct Operations

Brennan conducts annual benchmarking of staff salary packages to ensure staff are fairly and appropriately remunerated. Numerous additional employee benefits are provided to all employees and regularly assessed by management.



## Supply Chain

As part of the due diligence process Brennan conducted a review of all active suppliers. Brennan continues to engage with suppliers directly to ensure their supply chains are free of modern slavery risks. Brennan monitors the active supplier listing, and correspondence / results of questionnaires, ensuring an increasing number of suppliers are deemed low risk for modern slavery. The results of the qualitative analysis were generally positive with a number of key suppliers undertaking proactive measures to minimise and mitigate their modern slavery risk. An increasing number of these suppliers have put policies and protocols in place to address modern slavery risk

In the current reporting period, a process was put in place for all new suppliers to complete the questionnaire prior to engagement with Brennan, combined with the supplier code of conduct which has been revised in the current period. Further, the questionnaire sent to higher and medium risk suppliers (including to those suppliers that have previously completed the questionnaire) was enhanced to include more granular questions to assist Brennan to further understand the maturity of its suppliers and their awareness of modern slavery risks.

## FUTURE COMMITMENTS & NEXT STEPS

Brennan will work to increase collaboration with internal and external stakeholders to prevent and address any contribution that Brennan may have to the global issue of modern slavery. Brennan will achieve this by focusing on raising awareness of the forms of modern slavery among its employees and suppliers, continuing to evolve its due diligence processes to aid in the identification of risks, expanding the scope of its supply chain risk assessment, reviewing existing processes (particularly the IT hardware procurement process) and exploring ways to improve identification and action on risks throughout its supply chain. Further initiatives planned include:

- Further review of and engagement with potential high-risk suppliers who did not respond to Brennan's questionnaire
- Continually review and assess low and medium risk rated suppliers
- Continue to engage with the employees and suppliers of Brennan IT (India) Pte Ltd and Brennan SL (Private) Ltd
- Provide further training to employees on modern slavery

## CONSULTATION & APPROVAL

This statement is made pursuant to sections 14 and 16 of the Act. It has been made available for comment and review by the Brennan Executive Leadership team and constitutes the statement for the year ended 30 June 2022. The statement was approved by Dave Stevens as the Sole Director (the 'Principal Governing Body') of Brennan VDI Pty Limited on 21 December 2022. We consulted the relevant companies we own or control in the development of this statement. The statement will be updated annually.



**BRENNAN**  
People first – secure always

Dave Stevens  
Sole & Managing Director  
Brennan VDI Pty Limited  
21 December 2022