brennan_

Modern Slavery Statement

Commitment

Brennan is committed to a human-centric philosophy around our 'True Performance' standard. This is reflected in Brennan's culture and its value proposition for customers and also aligns to Brennan's continuous improvement to address modern slavery risks and meet its responsibilities under the Act.

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

This is a Modern Slavery statement for the 2024-2025 reporting period by Brennan IT Pty Limited ACN 082 699 367, the reporting entity under the Act, and by its parent Brennan VDI Pty Ltd ACN 125 976 007 and the subsidiaries of Brennan VDI Pty Ltd, listed on page page 3 (collectively Brennan).

Table of Contents

Our Structure, Operations and Supply Chains **4**

Modern Slavery Risks **7**

Actions to Assess & Address Risks of Modern Slavery **9**

Assessing Effectiveness of our Risk Management **12**

Consultation & Approval **13**



Our Structure, Operations and Supply Chains

Structure

Brennan IT Pty Limited is an Australian privately owned company founded in 1997.

Its immediate parent company, Brennan VDI Pty Ltd, is the parent company of the Brennan Group (**Brennan**).

At 30 June 2025 Brennan VDI Pty Ltd had the following Australian wholly owned subsidiaries:

Australian subsidiaries	
Owned during the whole of the reporting period	Brennan IT Pty Ltd ACN 082 699 367
	Brennan (Qld) Pty Ltd ACN 112 302 100 (formerly Simient Pty Ltd)
	Brennan (SA) Pty Ltd ACN 611 856 583 (formerly Nuago Pty Ltd)
	Brennan Telephony Pty Ltd ACN 059 909 894*
	Brennan Voice and Data Pty Ltd ACN 089 435 530
	Clade Solutions Pty Ltd ACN 160 269 894*
	Dienst Consulting Pty Ltd ACN 158 396 813*
	Forsythes IT & Communications Pty Ltd ACN 003 412 431*
	Forsythes Technology Group Pty Ltd ACN 158 875 873*
	Forsythes Technology Pty Ltd ACN 002 850 884*
	MOQdigital Pty Ltd ACN 112 930 515
	MOQ Pty Limited ACN 050 240 330*
	Superfluid Solutions Pty Ltd ACN 086 427 330*
	TETRAN Pty Ltd ACN 118 203 857*
	Wardy IT Solutions Pty Ltd ACN 634 547 023*
Acquired 1 April 2025	CBR Cyber Pty Ltd ACN 643 307 171

The companies marked * above are non-operating companies or were in run-down mode during the 2024-25 reporting period.

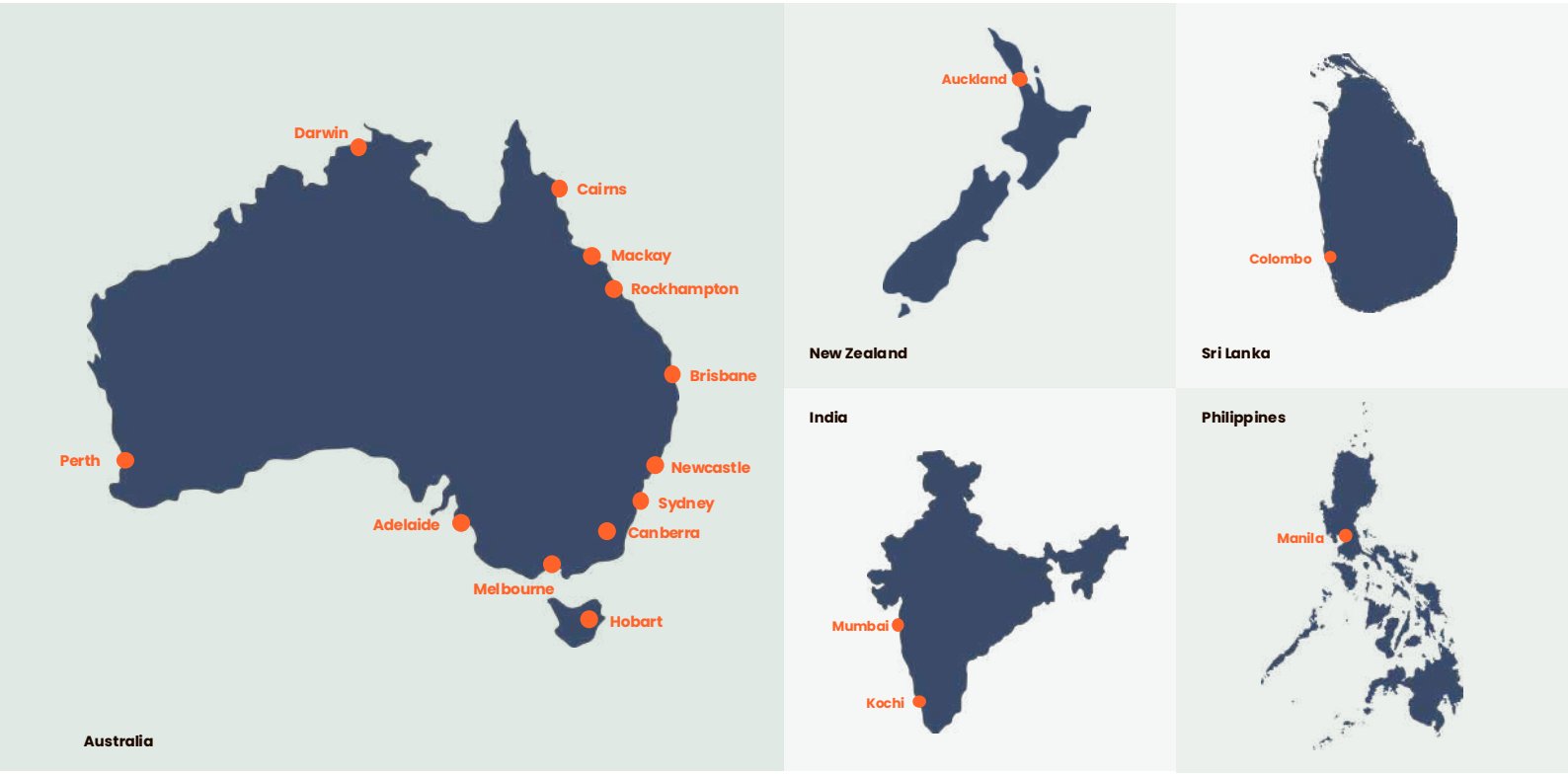
This Modern Slavery Statement also addresses operations and modern slavery risks of Brennan's overseas wholly owned subsidiaries, being:

Country	Subsidiaries
India	Brennan IT (India) Pte Ltd U72300MH2014FTC255 706
New Zealand	Brennan IT NZ Pty Limited NZ Co No 1594702
	MOQdigital NZ Ltd NZ Co no 3386076*
Singapore	Brennan IT (Singapore) Pte Ltd UEN: 201114581R*
	(holding company of Brennan IT (India) Pte Ltd)
Sri Lanka	Brennan SL (Private) Ltd NTIN 114 716 928-0000
	Brennan IT Lanka Private Limited PV 00311716*

* The companies marked * above are non-operating companies or were in run-down mode during the 2024-25 reporting period.

Operations

Brennan's operations are located in Australia, New Zealand, India and Sri Lanka, with offices in Sydney (head office), Adelaide, Brisbane, Canberra, Melbourne, Newcastle and Perth in Australia, Mumbai and Kochi in India and Colombo in Sri Lanka, and a presence in Auckland New Zealand and Manila Philippines. Brennan is establishing an Australian office in Hobart and also has a presence in Northern Australia, with staff based in northern Queensland and Northern Territory to support customer operations there as needed.



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

These functions are arranged in major service categories, broken out into eight key business divisions that encompass our full suite of IT services:

Our Services

Cybersecurity
Vulnerability, endpoint thread protection, application security, network and perimeter security. Data protection, monitoring and response, compliance and auditing.

Data & AI
Data Platform Modernisation, Modern Data Warehouse, Virtual DBA, Microsoft Power BI, Internet of Things, Microsoft Copilot.

Microsoft Dynamics
Customer experience, Microsoft Dynamics 365, Low Code Development, Custom Development & App

Modern Workplace
Collaboration tools/end-user compute.

Advanced Networking
Connectivity infrastructure, security and data services, SD-Wan telecommunications, conferencing, mobile fleet management.

Cloud & Infrastructure
Modernisation, Public & Sovereign Cloud, Hybrid IT, server storage & data centre.

Service Desk
End-user compute, Help desk, endpoint management.

Hardware & Software
Quoting, device as a service, procurement, finance, endpoint management.

Brennan has customers across government, private, and not-for-profit sectors and a broad range of industries including healthcare, education, infrastructure, mining, manufacturing, superannuation, insurance and retail.

Approximately 1000 staff are employed by Brennan, with the majority based in Australia. At the start of reporting period 2024-2025, on 1 July 2024 Brennan acquired Nuago Pty Limited (now Brennan (SA) Pty Limited) and on 1 April 2025 Brennan acquired CBR Cyber Pty Ltd. Together these acquisitions enhance Brennan's core strengths in its traditional disciplines and industries, while uplifting its government credentials, its sovereign delivery capabilities and its presence in South Australia and establishing an office in Australian Capital Territory.

Supply Chains

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

Brennan's supply chain includes over 300 active suppliers of IT services, IT related products and office support such as facilities management, office amenities and office consumables.

Brennan's direct suppliers are primarily located in Australia, but many source their products or services or have corporate group head offices overseas.



Modern Slavery Risks

Brennan's Operations

Brennan's operations in each of Australia, New Zealand, India and Sri Lanka are subject to local labour laws with which Brennan complies, supported by robust governance, employee policies and procedures.

Our policies require, in addition to compliance with local laws, our alignment to:

- Brennan's Code of Conduct
- Brennan's core values, refreshed during the reporting period to "one team" "show your commitment" "own it" and "make it better"
- Brennan's culture, which was the subject of substantial review during the reporting period, was relaunched as "True Performance" in February 2025 and is now the focus of staff performance review and self-reflection.



Real values that drive true performance

Technology never stands still. Neither do we. It's why we foster a culture of collaboration and commitment, ownership and improvement to make our lives – and those of our clients – better than they were yesterday.

These are the **values** that shape how we think and act.

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

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

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

Brennan's Supply Chains

The Brennan supply chains include a mix of higher to lower risks for modern slavery. Based on Brennan's analysis of modern slavery risk factors, principally geography and sector, this risk is highest in respect of procurement of IT hardware, specifically hardware manufactured in Asia and shipped to Australia.

Sourcing some supplies to our overseas offices, such as cleaning services and office consumables, also involves relatively higher risks than the Brennan norm.

We acknowledge that we continue to lack visibility in overseas markets of higher tiers in our supply chains and that Brennan lacks the commercial influence to force robust anti-modern slavery action into its supply chain through its own leverage. Instead, we manage this primarily by procuring IT hardware from reputable Australian and international suppliers, with published modern slavery statements and sufficient leverage to require minimum thresholds of social responsibility in their supply chains.



Actions to Assess & Address Risks of Modern Slavery

Start FY 2024-25

Staff ownership

All Brennan staff are required to be alert to risks of modern slavery in Brennan's supply chains and those engaging suppliers are required to 'own' this, be curious and report if aware of circumstances that give rise to suspicion of modern slavery.

Brennan's Vendor Management team is primarily responsible for supply chain due diligence, aided by others with relevant expertise, such as information security, legal and finance specialists as appropriate. An ethical supply chain due diligence questionnaire, updated during the previous reporting period, is used when onboarding new vendors. It addresses modern slavery risk and other regulatory requirements for good corporate citizenship.

Approach is structured under policies

Brennan's Vendor Management team and stakeholders operate consistently with Brennan's:

- Procurement Policy, which provides the overall framework and direction for the sustainable and systematic management of procurement at Brennan
- Anti-Modern Slavery Policy, which provides more specific direction to combat modern slavery.

Brennan's Anti-Modern Slavery Policy addresses engagement with suppliers about their modern slavery risk profiles and practices. The Policy is internally published to all staff and is required reading as part of Australian staff on-boarding.

Consistently with our Anti-Modern Slavery Policy and our Procurement Policy (which incorporates vendor onboarding) due diligence for new suppliers includes:

- Sending modern slavery questionnaires
- Following up and reviewing responses to questionnaires in support of modern slavery risk assessment; and
- Desktop reviews of suppliers' online materials as appropriate.

Continuous improvement FY 2024-25

Overview

During the reporting period, Brennan has uplifted its Anti-Modern Slavery practices with activity based in four areas:

- **Governance:** uplifted and formalised its AMS governance
- **Due diligence:** built on AMS due diligence of new vendors and commenced renewed due diligence of existing vendors, based on AMS risk weighting
- **Resources:** enhanced Brennan's AMS resources and commenced AMS training of staff with high exposure to supply chains
- **Remediation:** developed AMS remediation principles in the form of Commitments to combat Modern Slavery.

Governance

AMS Committee

During the reporting period, Brennan documented its AMS governance structure and established an AMS Committee, with a formal Charter.

The AMS Committee consists of:

- Chief Financial Officer, who also functions as Brennan's Chief Risk Officer (Chair and Executive Sponsor)
- General Counsel (Committee Secretary)
- Vendor Management Lead (primarily responsible for supply chain due diligence)
- General Manager, Finance
- Head of Hardware & Software Product sales and
- Such other members as the Chief Financial Officer determines.

The Committee's functions include implementing an annual modern slavery action plan and reviewing the effectiveness of actions taken under it.

Updated AMS Policy

A review to update and strengthen the Anti-Modern Slavery Policy commenced in April 2024 and was finalised in the 2024-25 reporting period.

In the course of that review the Policy was updated and aligned to the UN GCNA SME playbook. Previously called the Modern Slavery Policy, it was renamed the Anti-Modern Slavery Policy and was republished on the Brennan intranet.

Updated Supplier Code of Conduct

During the reporting period, the Supplier Code of Conduct was revised to be shorter and more focused on 4 key issues, including Human Rights and Labour Practices, as well as reporting of breaches of its requirements.



Due diligence

In addition to continuing with its due diligence of all new suppliers, Brennan commenced review of existing relationships within Brennan's supply chains based on risk, to identify Brennan's highest risk customers.

These highest risk suppliers were then the subject of renewed AMS due diligence, with this to be a rolling process going forward.

Resources

During the reporting period, Brennan improved the AMS resources available to staff, including:

- Developing staff training materials
- Commencing Brennan-specific training of staff, prioritised based on exposure to Brennan supply chains
- A dedicated Modern Slavery intranet webpage, collecting in one place: the AMS Policy, tools, training materials and useful links.

Remediation commitments

Brennan developed and adopted a set of 8 commitments to combat and remediate modern slavery, including 4 addressing how to own the risks of modern slavery and 4 about responding to any identified instances of modern slavery.

These acknowledge the challenge of Brennan's ability to leverage influence deep into our supply chains but also recognise the need to own the issue and co-operate with others in taking action to address modern slavery, rather than leaving this for others to remediate.

These commitments are communicated in training and published on the Brennan intranet. To inspire, they appear under the Sydney Smith quote:

"It is the greatest of all mistakes, to do nothing because you can only do little."

Escalation of concerns for engagement / remediation as needed

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

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

Assessing Effectiveness of our Risk Management

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

During the reporting period Brennan instigated a process for annual planning of its actions to combat modern slavery and governance meetings of its Anti-Modern Slavery Committee to assess progress against the plan.

Previously our effectiveness assessment has focused on supplier responses to Brennan's AMS due diligence questionnaires and our cataloguing of suppliers against their modern slavery risks.

Brennan keeps records of the due diligence questionnaires it sends to suppliers, response rates and responses. Otherwise, qualitative analysis of these responses is generally positive in terms of 'first stage' awareness raising and response to modern slavery laws, with:

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

Brennan views these outcomes as being a result of the combined effect of:

- The Modern Slavery Act and its reporting obligations
- The individual leverage of government or hyper-scaled enterprises as customers
- Increasingly widespread community expectations of corporations concerning their Environment, Social and Governance practices.

Brennan acknowledges that the Modern Slavery Act was designed to leverage the cumulative influence of customers up supply chains to bring commercial pressure to bear on those who may otherwise be tempted to engage in modern slavery or rewarded for doing so in the absence of transparency. It is expected this cumulative customer pressure will increase over time as each reporting entity engages in incremental year-on-year improvements in their own anti-modern slavery activity.



Consultation & Approval

This statement is made pursuant to sections 13 and 16 of the Act for the reporting period 1 July 2024 to 30 June 2025. It has been made available for review and comment by the Brennan Executive Leadership team and country-heads for each overseas country in which Brennan operates.

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

This statement was approved on 2 December 2025 by Dave Stevens, the Sole Director (the 'Principal Governing Body') of Brennan VDI Pty Limited, the parent company of the Brennan Group during the reporting period and of each Australian subsidiary.



David Stevens

Managing Director

Brennan Group

2 December 2025

brennan_

brennanit.com.au

1300 500 000

sayhello@brennanit.com.au