



Synnex Australia Pty Ltd

ABN 40 052 285 882

Modern Slavery Statement

Introduction

This Modern Slavery Statement (“Statement”) is submitted in accordance to the Australian Modern Slavery Act 2018 (Cth), and covers Synnex Australia Pty Ltd ABN 40 052 285 882 (“Synnex”), for the period from 1 July 2023 to 30 June 2024.

At Synnex, we understand that modern slavery constitutes serious violations of human rights, including forced labour, child labour, debt bondage, servitude, forced marriage, deceptive recruitment, and human trafficking. We are committed to maintaining the highest ethical standards of ethical conduct and fostering a business environment that prioritises human rights across all aspects of our operations and supply chains.

Through robust policies, due diligence processes, and partnerships with stakeholders, we strive to identify, mitigate, and address risks of modern slavery. Our commitment to ethical sourcing practices reflects our dedication to promoting fairness, dignity, and respect for all individuals – both within our internal workforce and across our broader supply chain.

This Statement addresses seven mandatory reporting criteria outlined in section 16 of the Modern Slavery Act, highlighting our continued efforts to prevent modern slavery and human trafficking within our sphere of influence.

Our Structure, Operations, and Supply Chain

Synnex Australia, a private company incorporated in Australia in 1997 has grown to become a leading ICT services provider and a trusted partner of choice for the Australian technology industry. With over 479 employees, Synnex operates nationwide, with headquarters in Melbourne and offices in Sydney and Perth. As Synnex has no subsidiaries, this Statement pertains solely to our activities.

For over 27 years, Synnex has provided value to the IT channel, enabling businesses to enhance profitability. Our extensive experience and strong channel heritage differentiate us as a reliable partner in the local technology sector. We work with international and local vendors to deliver comprehensive end-to-end solutions, including hardware, software, cloud services, and integrated lifecycle management. These offerings support SMBs, system integrators, VARs, enterprise resellers, and managed and cloud service providers. As the local landscape continues to evolve, we adapt by refining our value proposition and expanding our business solutions to drive long-term channel growth and engagement.

We firmly believe that respecting human rights is a core value, shared by our customers, business partners, and the broader community. To prevent potential human rights abuses, we monitor, manage, and report progress using a range of indicators to assess the effectiveness of our modern slavery initiatives.

During this reporting period, our principal activities remained focused on the distribution of electronic technology products and software, with no significant changes to their nature. We

have conducted a comprehensive review of our key business operations and supply chains as detailed below:

Main business activities	Supply chains
<p>Distribution of ICT products and services: This includes but not limited to, the supply of hardware, software, cloud-based solutions, and lifecycle management services, to businesses and end customers.</p>	<p>International and Local ICT Vendors: Suppliers of ICT products, software, cloud - based solutions and services to Synnex for resale. Our primary vendors include globally recognised technology brands, such as Microsoft, HP, Apple, Lenovo, Samsung, and others.</p>
<p>Operational Support Services: These are business operations that support the daily operations of Synnex excluding the supply of inventory and services for resale purposes.</p>	<p>Contractors and sub-contractors: Providers of services directly to Synnex, such as courier services.</p>
	<p>Office Rentals</p>
	<p>Energy and Utility Providers</p>
	<p>Professional Services Consultants: Experts providing various consulting and advisory services directly to Synnex</p>
	<p>Office Consumables and Promotional Merchandise</p>
<p>Uniforms and Work Attire</p>	

Risk identification and assessment in our operations and supply chains

In this reporting period, we focused on identifying and assessing risks related to modern slavery within both our operations and supply chain. This process involved reviewing three key areas:

1. Internal Risk Assessment - Human Resources Practices
2. External Supply Chain - Trade Supplier in the Distribution Business Segment
3. External Supply Chain – Non-Trade Suppliers and Service Providers

Internal risk assessment – HR practice

During the reporting period, our workforce averaged 479 employees, with 70% in permanent roles and 30% employed on a casual basis. All employees, regardless of employment type, are based in Australia and work under formal employment contracts directly with Synnex.

Our internal human resources policies are designed to ensure fair treatment, protect employee rights, and foster a safe and inclusive work environment. These policies, along with ongoing reviews and monitoring of our procedures, reflect our commitment to minimising the risk of modern slavery within our internal operations. By cultivating a transparent and ethical workplace culture, we strive to uphold the highest standards of human rights and labour protections for all our employees.

Pre-Employment Screening and Onboarding Process

Our internal Human Resources (HR) department conducts individual assessments for all employees in accordance with our established recruitment policy. As part of the pre-employment screening process, HR verifies that applicants meet legal and role-specific requirements, including visa eligibility, police checks, and employment and reference checks.

Once all mandatory verifications are successfully completed, new employees are issued a formal employment contract and a detailed position description. Upon joining, employees participate in a structured formal induction program. During onboarding, employees receive essential resources, such as the Employee Manual, which details company policies, the Code of Conduct, and the Fair Work Statement.

For employees with non-Australian passport holders, HR follows comprehensive procedures and documentation to monitor and manage visa statuses, ensuring ongoing compliance with legal requirements. This process reflects our commitment to fair and transparent employment practices while fostering a supportive workplace culture.

Ongoing compliance training

All employees participate in regular training programs and information sessions to reinforce our policies and Code of Conduct. These initiatives ensure a respectful, ethical, and compliant workplace culture.

In addition, team leaders and managers receive specialised training tailored to their roles. This includes sessions on **Equal Employment Opportunity (EEO)**, and the prevention of bullying and harassment. These programs provide our leaders with the knowledge and tools to promote a safe, inclusive, and fair work environment.

Employee Wellbeing

Our **Employee Assistance Program (EAP)** supports the mental health and wellbeing of our workforce by offering access to qualified psychologists for private counselling. Fully funded by the company, this program helps employees address personal or work-related mental health concerns.

We also organise well-being focused events throughout the year, fostering a supportive and inclusive workplace environment. These initiatives underscore our commitment to employee welfare and play a role in mitigating risks associated with modern slavery, such as exploitation or unfair treatment.

Given these measures, we have determined that the risk of modern slavery within our internal operations is low to minimal, particularly in activities directly carried out by Synnex employees. Any potential risks are thoroughly addressed through our established internal processes.

External suppliers risk assessment

Synnex is committed to upholding the highest ethical and professional standards, and we expect our suppliers and partners to share this commitment to fair and legitimate business practices.

External supply chain – distribution of IT products and services

Synnex's primary supply chain consists of ICT products and services suppliers. According to the **Global Slavery Index 2023** published in May 2023, electronics remain the highest-value-at risk import for many G20 countries. As a distributor of laptops, computers, and other electronic products, Synnex recognises the potential risks of modern slavery within our supply chain. In the recent reporting period, we maintained our emphasis on assessing modern slavery risks with our trade suppliers.

In the reporting period, we continued to focus on assessing and addressing modern slavery within our trade suppliers. We expanded our analysis to cover our top 40 trade suppliers, who collectively account for over 99.5% of our total procurement spend. This comprehensive review was designed to identify and evaluate any potential risks of modern slavery within their operations and supply chains. Through this initiative, we reaffirmed our commitment to ethical sourcing practices, supplier accountability, and compliance with legal and industry standards.

Our analysis revealed the following:

- **16 suppliers** have submitted their Modern Slavery Statements in accordance with Australian legislation.
- **29 suppliers** have published Modern Slavery Statements and confirmed their compliance with the **Australian Modern Slavery Act 2018 (Cth)** or equivalent regulations in other jurisdictions.
- **34 suppliers** have published Corporate Social Responsibility (CSR) Statements, demonstrating their commitment to responsible business practices, human rights, and environmental protection.
- **21 suppliers** are members of the **Responsible Business Alliance (RBA)**, the world's largest coalition dedicated to corporate social responsibility in global supply chains. The RBA regularly updates best practices for identifying and mitigating modern slavery risks.
- A few suppliers, though not official RBA members, have voluntarily undergone RBA audits and adhered to the **UN Guiding Principles on Business and Human Rights**.

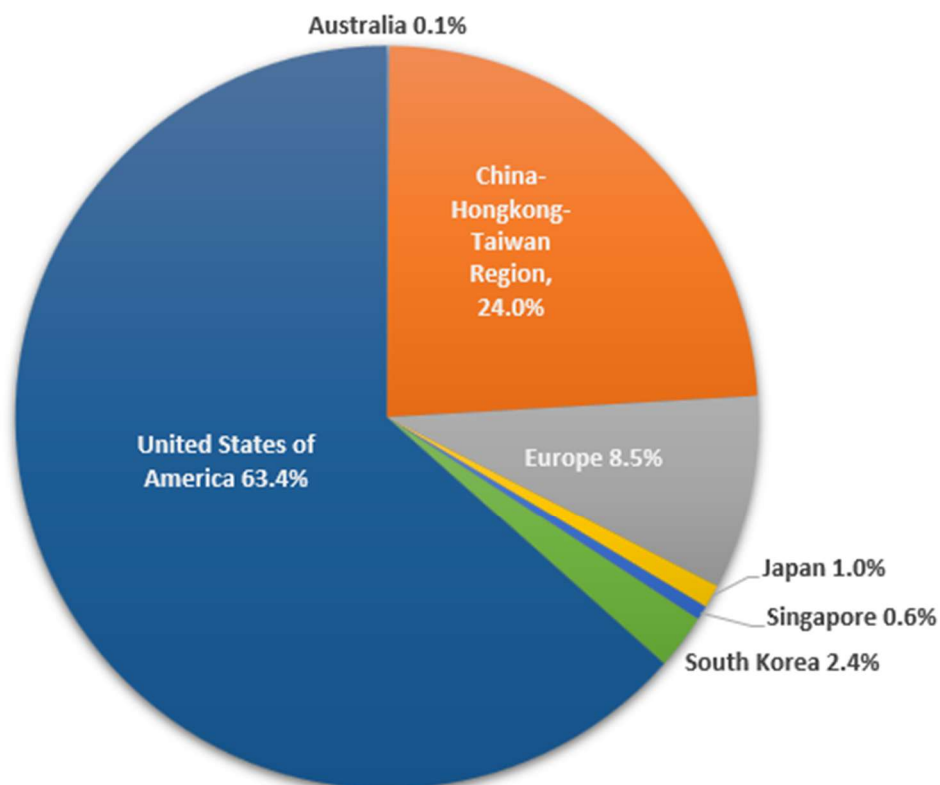
While our larger suppliers have made significant progress in addressing modern slavery, we note that our smaller trade suppliers are less active in implementing modern slavery and social responsibility policies. We are committed to engaging more closely with these suppliers in the future to encourage greater compliance and adherence to ethical standards.

Measurement Criteria	% of Top 10 Suppliers	% of Top 11-20 Suppliers	% of Top 21-30 Suppliers	% of Top 31-40 Suppliers	Overall %
Publish of Modern Slavery Statement in Australia	60%	40%	40%	20%	40%
Modern Slavery statement in compliance to Australian Modern Slavery Act 2018 (Cth), or equivalent act in other jurisdiction	100%	70%	80%	40%	73%
Publish of Corporate Social Responsibility statement	100%	100%	90%	50%	85%
Responsible Business Alliance(RBA) Membership	90%	50%	50%	20%	53%

From Geographic risks perspective, we recognise that suppliers in certain countries may face higher risks of modern slavery due to comparatively weaker governance frameworks around labour laws and practices. Of our top 40 suppliers, 23 are headquartered regions with robust regulatory frameworks, including **United States, European Union, and Australia**. These regions are subject to strong governance and legal responses, which generally indicate a lower level of geographic risk. In contrast, 17 suppliers are based in Asia, with 2 in Japan, 1 in Singapore, 2 in South Korea, 12 in the **China-Hongkong-Taiwan** Region.

The geographic distribution of our supply chain based on trade spend is summarised in the chart below. It is noteworthy 63.4% of our purchases come from the United States followed by 24% from the China-Hong Kong-Taiwan region.

Top 40 Trade Suppliers- Trade Spent by Region



Despite the inherent risks associated with sourcing electronic products, we are encouraged to see that a significant portion of our major suppliers have proactively implemented policies to identify and address modern slavery risks. These efforts demonstrate their commitment to responsible business practices and alignment with international standards, including the

Modern Slavery Act 2018 (Cth) and the United Nations Guiding Principles on Business and Human Rights. We continue to engage with our smaller trade suppliers to improve their compliance and further mitigate modern slavery risks across the supply chain.

External Supply Chain – Non-trade suppliers and service providers

In addition to the vendors supporting our core distribution business, we rely on various non-trade suppliers and service providers to support our daily operations. These include professional services, courier services, utilities, rental services, cleaning, and office supplies. Combined with inventory and IT service purchases, these operational expenditures accounted for approximately 1.53% of total purchases in 2023/24.

Geographically, the majority of our non-trade suppliers and service providers are based in Australia, a country with a strong regulatory framework that reduces the risks of modern slavery. However, we recognise that risks may still exist. To mitigate this, we have implemented internal policies to guide supplier selection and ensure ethical standards are consistently upheld.

Our Actions, Policies and Procedures

We have established formal policies to promote ethical, lawful business conduct, and foster positive relationships. These policies are integral to our core value of “making a positive difference”. We are committed to sustainable development and strive to conduct our business with the highest standards of integrity and professionalism, including a firm dedication to preventing human rights violations. Our approach is guided by international standards and best practices, reflecting our commitment to corporate responsibility and accountability.

Supplier Onboarding Process

We have implemented a supplier onboarding process through our **Qualifying Supplier Program**. This ensures that all our suppliers understand our commitment to ethical business practices and zero tolerance policy regarding modern slavery. As part of this process, we provide suppliers with our **Supplier Code of Conduct (SCC)** and require their formal acknowledgment, typically through written confirmation. The SCC outlines Synnex’s expectations for contracted suppliers and is a critical tool in preventing modern slavery within our supply chain. It explicitly prohibits all forms of forced labour, including physical confinement at the workplace, child labour, involuntary overtime, and the withholding of personal documents or deposits as conditions for employment.

Throughout this year, we have maintained and strengthened this onboarding process, ensuring its effectiveness in upholding ethical standards and promoting compliance across our supply chain.

Whistleblower Policy

Synnex is committed to maintaining the highest standards of conduct in all our business operations, fostering a culture of integrity, ethical behaviour, corporate compliance, and strong corporate governance. To support this commitment, we have established clear reporting procedures to encourage the reporting of any wrongdoing. This may include unethical, illegal, fraudulent, or undesirable conduct involving Synnex's operations. We ensure that individuals who report concerns can do so safely, without fear of intimidation, retaliation, or any form of retribution. Employees are encouraged to report concerns to their managers, CEO, CFO, or HR. For those wishing to report anonymously, we provide an accessible whistleblower scheme through e-mail, phone, or an online portal, ensuring confidential and protected channels for raising issues.

Employee Professional Code of Conduct

Synnex expects our business to be conducted with the highest standards of integrity and professionalism. Our Code of Conduct sets out four basic principles that governs our ethical practices and underscores the expectations that all Synnex employees, as well as third parties acting on our behalf maintain the highest standards of ethics, honesty, and integrity. As part of our onboarding process, all employees must sign and acknowledge their agreement to adhere to this professional Code of Conduct.

Assessing the effectiveness of our actions

Synnex recognises the importance of continually improving our approach to managing risks relating to modern slavery. This includes taking proactive measures to evaluate the effectiveness of our actions and adapting our strategies as needed. During the current reporting period, we did not identify any instances of modern slavery breach within our own operations. Based on our assessment of the supply chain, there was no significant incident reported.

We are pleased to note that many of our major vendors are recognised leaders in the IT industry, and most have proactively implemented robust policies to address and mitigate the risks of modern slavery. Through an analysis of our top 40 suppliers, we found a few do not currently have published Modern Slavery Policies. We are committed to engaging with these suppliers to encourage the development of such policies and to ensure continued monitoring of potential risks.

Synnex acknowledges that evaluating the effectiveness of efforts to combat modern slavery is an ongoing process. We are committed to continually refining our assessment practices to stay in line with evolving standards, best practices, and regulatory requirements. This will ensure that our strategies remain effective in addressing modern slavery risks across our supply chain.

Consultation process

Synnex Australia does not own or control any other entities, and as such, we are not required to consult with any external parties in the preparation of this statement.

Our FY24/25 commitment

In the next reporting period, our key priorities will include:

- Continuing to build stronger relationships with all suppliers, including conducting comprehensive risk analysis of our supply chain that extends to our smaller trade suppliers.
- Ongoing review and enhancement of our risk-related policies and governance measures.

We recognise that addressing modern slavery is a collective responsibility and cannot be achieved by one organisation alone. To this end, Synnex is committed to working more closely with our suppliers and continuously improving our systems to better identify, assess, and mitigate the risks of modern slavery within our operations and supply chain.

Approval

Preventing modern slavery and human rights abuse aligns with Synnex's core values.

This statement was approved by the Board of Directors of Synnex Australia Pty Ltd on 13 Dec 2024.



Bob Sui Chung Tang

Director - Synnex Australia