



**BRENNAN**  
People first – secure always

# MODERN SLAVERY STATEMENT

*20 December 2023*

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

This is a joint Modern Slavery statement for the 2022-2023 reporting period by Brennan VDI Pty Ltd ACN 125 976 007 and its subsidiaries, listed below (collectively Brennan).

## COMMITMENT

Brennan is committed to a human-centric philosophy of “People First – Secure Always”. This is reflected in Brennan’s culture and its value proposition for customers and also aligns to Brennan’s continuous improvement to meet its responsibilities under the Act.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Structure

Brennan VDI Pty Limited is an Australian privately owned company founded in 1997, which is the parent company of the Brennan Group. Brennan VDI Pty Ltd has the following Australian wholly owned subsidiaries:

- Brennan IT Pty Ltd ACN 082 699 367
- 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
- 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
- Simient Pty Ltd ACN 112 302 100
- Superfluid Solutions Pty Ltd ACN 086 427 330
- Dienst Consulting Pty Ltd ACN 158 396 813 (acquired in November 2022)
- MOQdigital Pty Ltd ACN 112 930 515 (acquired in November 2022)
- MOQ Pty Limited ACN 050 240 330 (acquired in November 2022)
- TETRAN Pty Ltd ACN 118 203 857 (acquired in November 2022)
- Wardy IT Solutions Pty Ltd ACN 634 547 023 (acquired in November 2022)

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

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 (acquired in November 2022)

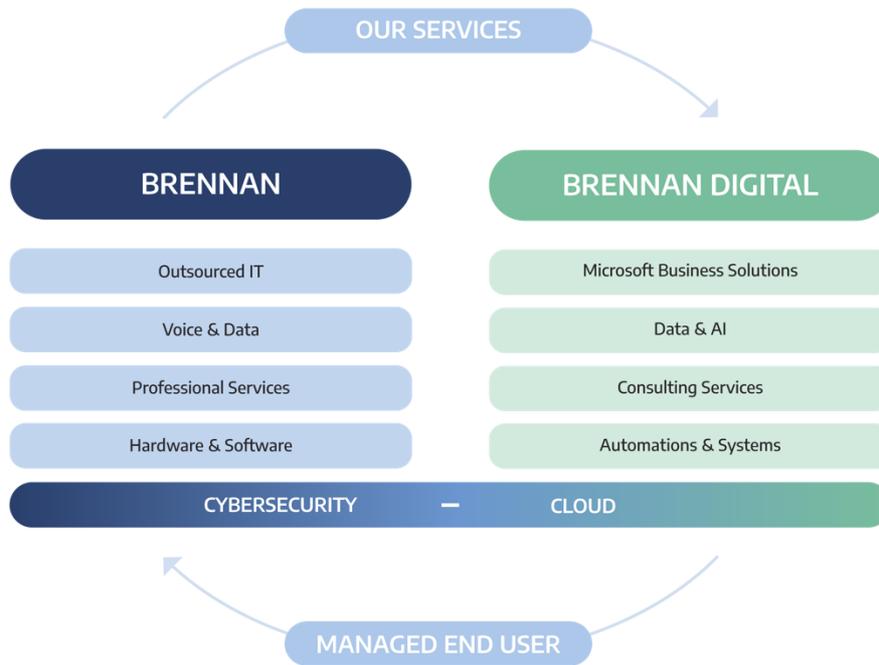
Singapore	Brennan IT (Singapore) Pte Ltd UEN: 201114581R (non-operating holding company of Brennan IT (India) Pte Ltd)
Sri Lanka	Brennan SL (Private) Ltd NTIN 114 716 928-0000 (formerly MOQdigital Asia Pacific (Private) Ltd, acquired in November 2022)

## Operations

Brennan’s operations are located in Australia, New Zealand, India and Sri Lanka.



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, Data and AI, automation, IT staff placements and augmentation services, project services, and cyber security requirements. These functions are arranged in two primary service categories, namely the long-standing managed services offering of Brennan and the newer division of Brennan Digital, which brings together transformative digital capabilities.



Brennan’s clients are spread across a broad range of industries including healthcare, education, infrastructure, manufacturing, superannuation, insurance and retail within the government, private, and not-for-profit sectors.

Approximately 950 staff are employed by Brennan, with the majority based in Australia. In the reporting period 2022-2023, Brennan completed the acquisition of MOQ Limited (now MOQ Pty Limited) and its subsidiaries, enhancing Brennan’s core strengths in its traditional disciplines and industries, while developing its digital capabilities.

### Supply Chains

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

Brennan’s supply chain includes over 600 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

### 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 employee policies and procedures. These policies require compliance with local law and adherence to:

- Brennan’s culture reflected in its by-line “People First – Secure Always” and
- Brennan’s core values, two of which are “show you care” and “make it better”.



**ONE TEAM**  
Always aligned to deliver brilliant outcomes



**SHOW YOU CARE**  
Care for each other and the customer, always



**OWN IT**  
Take it on, don't pass it on – you've got this



**MAKE IT BETTER**  
Confront complexity, inside and out

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 whistle-blowing 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. Specifically in Sri Lanka, mechanisms are in place to mitigate the impacts of hyperinflation on Brennan employees and their salaries.

### 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, risk is highest in respect of procurement of IT hardware, specifically hardware manufactured in Asia. Sourcing of 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 but manage this primarily through 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 AND ADDRESS RISKS OF MODERN SLAVERY

Brennan’s culture, core values and employment practices outlined above keep the risk of modern slavery within its workforce negligible.

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

Consistently with that policy and with the supplier onboarding processes set out in our Procurement Policy, after classifying suppliers into higher, medium and lower risk for modern slavery based on geographical location, sector and other known variables, supplier due diligence focusses on higher risk suppliers and includes:

- Online search of higher risk suppliers for relevant modern slavery statements and disclosures.
- Sending modern slavery questionnaires to new suppliers and to existing suppliers assessed as higher risk, requesting information on their compliance with the requirements of the Act.
- Following up and reviewing responses to questionnaires.
- Introducing during the reporting period, a software package which facilitates generation and tracking of questionnaires and responses, to increase the efficiency of information gathering for modern slavery risk assessment.

During the reporting period Brennan has also created a Vendor Management department and introduced a Procurement Policy to provide the overall framework and direction for the sustainable and systematic management and governance of procurement at Brennan. The Procurement Policy embraces the concept of Responsible and Sustainable Purchasing, which specifically addresses modern slavery principles and promotes ethical and social outcomes.

A new procurement process, supported by flowchart decision-making, was also introduced during the reporting period and is now the first point of reference for managing new supplier engagements.

Shortly after the reporting period, Brennan appointed a Head of Vendor Management, who is responsible for monitoring and mitigation of modern slavery risks across our supply chains.

Brennan has other policies and guidance for employees and statements of commitment, as listed below.

- Code of Conduct
- Anti-bribery and anti-corruption policy
- Leadership training
- Public commitments to:
  - People First – Secure Always
  - Corporate social responsibility <https://www.brennanit.com.au/about-us/corporate-social-responsibility/>

In combination with our corporate values (noted on page 5) and our Modern Slavery and Procurement Policies, these statements of commitment and guidance for staff reinforce our drive to proactive, responsible, caring ownership of our environments and stakeholders – including those in our supply chains.

## 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 Whistle-blower Policy.

The escalation process is expected to bring any potential issues relating to modern slavery in Brennan’s supply chains to the attention of sufficiently 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 will be an ongoing and evolving process.

To date our effectiveness assessment focuses on changed supplier conduct, including responses to questionnaires and the content of those responses and our cataloguing of suppliers against their modern slavery risks.

Qualitative analysis of supplier responses to questionnaire are 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.

## CONSULTATION & APPROVAL

This statement is made pursuant to sections 14 and 16 of the Act for the reporting period 1 July 2022 to 30 June 2023. 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 the Executive Leadership Team and the operational staff with responsibility for preparing this joint 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 by Dave Stevens, the Sole Director (the ‘Principal Governing Body’) of Brennan VDI Pty Limited, the parent company of the Brennan Group and of each Australian subsidiary on 14 December 2023.



David Stevens  
Managing Director  
Brennan Group

20 December 2023