



Modern Slavery Statement June 2023



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1. Introduction

At Interactive, we respect and support human rights and are committed to eradicating modern slavery from our operations and supply chain. Modern slavery is a crime.

We do not tolerate discrimination, bullying or harassment, forced or compulsory, child, or underage labour. We expect our suppliers and partners to comply with applicable local and international laws, to allow workers the right of freedom of association, to compensate workers for their work in a timely manner that is sufficient to meet the workers basic needs and not use deductions from wages as disciplinary measures.

This Modern Slavery Statement is made under the Commonwealth Modern Slavery Act 2018, reporting for the period ending June 2023. In this statement we describe our business and supply chain and how we operate them. We disclose our risk of modern slavery and explain the framework we have put in place to manage and mitigate this risk.

This policy applies to all staff (individual, corporations, and other legal entities) involved in Interactive's supply chain including directors, employees, officers, contractors, or other representatives of Interactive.

2. Our company

For over 30 years, Interactive has been helping our customers spend less time on their IT and more time on their businesses. Interactive is Australia's largest, privately held, IT company.

We are the number one independent provider of Cloud, Cyber and Systems.

Our Cloud business provides, Data Centre Services, Business Continuity Services and facilities and Cloud and Managed Services.

Our Cyber Security services include, but are not limited to, Cyber Risk Consulting, Technical Assurance, 24x7 Active Defence, Digital Forensics and Incident Response.

Systems is inclusive of hardware maintenance and systems maintenance. This includes Cisco and NetApp support, product sales, professional services, monitoring and EraseIT. Our services are available throughout Australia and New Zealand.

Our company purpose is to 'keep technology human' and we recognise that our business activities have an impact on not only our own employees but on the people in our supply chain.

We remain committed to actively promoting a sustainable and diverse operation to limit our social and environmental impact wherever possible.



3. Our structure, operations, and supply chain

3.1. Structure & operations

Interactive Pty. Limited is an Australian Private Company. The annual revenue for financial year ending June 2022 was \$219 (AUD) million.

Interactive has approximately 630 employees and operates across 9 sites in Australia and 1 site in New Zealand. We also have a small number of staff located in the Philippines. The majority of our employees are full time with 5% either part time or casual. Interactive recruits our employees and contractors directly or via reputable employment services.

The Interactive group includes two subsidiaries:

EraseIT: is a wholly owned subsidiary of Interactive Pty Ltd and has been part of the Interactive group for over 20 years. EraseIT provides secure and certified data erasure from IT assets and recycling of this equipment to minimise E waste. Erase IT currently employees approximately 35 people located in Melbourne.

Erase IT leverages many of Interactive's policies and training courses including Modern Slavery, Supply Chain Structure and Interactive's Staff and Supplier Code of Conduct and onboarding processes.

Slipstream: Interactive is proud to announce the acquisition of Slipstream effective July 2023.

Slipstream is a 24x7 Security Operations Centre with the first globally renowned CREST accreditation in Australia. Slipstream delivers world class cyber threat detection and response services to clients across Australia and internationally.

Over the coming year Interactive will work with Slipstream to consult on the Modern Slavery requirements of the Commonwealth Modern Slavery Act 2018 and to integrate Slipstream into the existing Interactive policies and procedures.



3.2. Supply Chain

Interactive's supply chain supports our business activities from the everyday operation of corporate offices, purchasing of computer equipment and parts, transportation of products and fit out and construction of our premises.

Interactive's procurement is split into 13 procurement categories with over 1,200 active suppliers. 95% of our suppliers are located within Australia. The balance is located in Denmark, Israel, Singapore, UK and the USA.

In our Systems and Cloud business, we source electronic components directly from the manufacturers or from brokers who have access to a global network. The brokers that we engage are all licensed, the electronic equipment and hardware we procure through them are genuine parts from suppliers such as Cisco, IBM, Dell, and HP. Our top ten suppliers in the Systems Business Unit account for 90% of our Systems business spend.

Construction and operation of our business continuity suites and data centres, means that our supply chain is also sourced from the property and construction sector. In this sector our aim is to have long-term relationships with well-established, preferred suppliers.

EraseIT has three key suppliers being two freight companies, and one e-waste supplier.

4. Risks of modern slavery practices in our operations and supply chain

Interactive conducted a social risk assessment to determine the level and location of risk within our supply chain and operations.

The risk assessment method relied on market models that trace commodities and services across the supply chain. This means that the modern slavery risk rating of our procurement reflects not only the generic risk of first tier suppliers, but also second and third tier suppliers that exist upstream. The assessment analysed our 13 procurement categories for risk of child labour, forced labour, wage assessment, excessive working time, exploitation of migrant labour, freedom of association, gender equality, legal systems, and corruption. The level of risk per category potentially increases with spend and includes the inherent risk of transacting in the industries that the suppliers belong to.



Due to the complexity, length, and nature of our supply chain, potential risk exists of modern slavery within it. The highest risk of modern slavery is within our procurement of products or services that involve manufacturing, high-risk materials, or low skilled labour. The categories of procurement of goods with the highest risk includes computer equipment, electrical machinery, merchandise, and office furniture. The categories of procurement of services include construction work, cleaning, catering, and business services that are potentially offshored or employing visa holders and short-term staff.

A Modern Slavery questionnaire is completed as part of the onboarding process for each new supplier. Interactive's Procurement team review the information provided and determine if the supplier is meeting modern slavery requirements under the Commonwealth Modern Slavery Act 2018 and identify potential risks of modern slavery. As part of this process the supplier is allocated a risk rating. This rating determines the frequency in which Interactive engages with the supplier in further assessing modern slavery risk.

On review of Interactive's business operations and supply chain, it was concluded that Interactive does not cause or contribute to modern slavery risk. Whilst there was no evidence that Interactive is directly linked to modern slavery through our supply chain, the potential of modern slavery in our extended supply chain exists.

4.1. Prioritising areas of risk for future focus

Interactive's risk assessment and mapping of our operations and supply chain has improved our understanding of first tier suppliers and modern slavery risk areas. We review this risk assessment and the risk rating allocated to suppliers annually. We then use a set of criteria to prioritise monitoring for risks in our supply chain which can be replicated in future years.

Our criteria for prioritising product categories and suppliers include:

- Risk level: the likelihood that Interactive is involved with modern slavery through its operations or supply chain
- Spend: the annual dollar figure that Interactive spends on a supplier or procurement category



- Control: the degree of direct control generally with categories or directly with suppliers (contracts, proportion of business spend etc.)
- Influence: the ability to incentivise a supplier or work closely together (long term or future business, reputational advantage, capacity building etc.)

Interactive identified the following priority areas:

- Sourcing of furniture for fit outs
- Outsourced financial and other business services by third parties
- Australian labour use for construction
- Onsite labour from contracted services such as cleaning and security
- Merchandise supply chain

The areas found to be of elevated risk and spend level, but with relatively low levels of influence are:

- Supply chain risk in electronics hardware or parts
- Supply chain risk in construction materials and products

5. How we address our risks

5.1. Actions taken to address our risks

5.1.1. Modern Slavery Action Plan

Interactive has established an action plan for preventing, mitigating, and detecting modern slavery. The roadmap sets out actions that spans governance, risk management and due diligence, training and education, supplier engagement, partnerships, evaluation, and reporting.



5.1.2. Code of Conduct and Policies

Interactive's Sustainability Policy, in line with our Sustainability Strategy, is guided by the UN Sustainable Development Goals and our purpose to 'keep technology human'. It includes supply chain management as one of the key areas of focus for the next three to five years. This is in addition to aligning with the SDGs of gender equality and reducing inequalities.

Interactive has an internal Code of Conduct Policy for staff and a Supplier Code of Conduct for suppliers. These set the minimum expectation for our staff, suppliers, and partners to respect and support the protection of human rights of all workers in the supply chain. The codes cover human rights including child and forced labour, health and safety, environmental responsibility, ethical conduct including responsible sourcing.

All new staff to Interactive and subsidiaries are required to review and sign off on the Interactive Code of Conduct and Policies relating to their role. All Staff and have access to all Interactive policies via our Intranet. All policies are reviewed at least annually.

5.1.3. Supplier screening and approval process

We have an onboarding process for new suppliers. This is a structured process with various checks in place to minimise risk, including the risk of modern slavery.

This process requires the completion of:

- New supplier questionnaire – including Modern Slavery questionnaire
- Governing approvals for engagement
- Non-Disclosure Agreement (NDA)
- Master Procurement Agreement (MPA)
- Statement of work
- Supplier Code of Conduct

This information is used to determine the risk rating to associate to the new supplier for Modern Slavery. This process is followed for all new suppliers and issued to existing suppliers annually who are identified as high risk for modern slavery.



The supplier questionnaire covers the key drivers of risk, such as locations, subcontracting, overseas labour, use of labour hire and external recruitment. We ask elevated risk suppliers about the actions they are taking to assess and address human rights issues and modern slavery risks and how well they know their supply chain. The responses of the questionnaire indicate suppliers that require further scrutiny and due diligence.

5.1.4. FairCall Whistle-blower

Interactive subscribes to an independent Whistle-blower service which provides a hotline by toll-free telephone number, web-based access, post, and fax, for employees and third parties to make confidential reports. We understand the importance of having a whistle-blower service that is accessible, trusted, and anonymous so that modern slavery or human rights abuses can be uncovered and remediated. We promote this to suppliers during the onboarding process and during regular supplier engagement, encouraging open communication. We remind staff of the Whistle-blower process in our annual Code of Conduct training and WHS training and provide the details on both our internal intranet and external compliance website.

5.1.5. Remediation Framework

Interactive has a responsibility to take ownership of incidents and remediate the harms of modern slavery to people that are a result of Interactive's business activities. Interactive has an established Remediation Framework, based on The United Nations Guiding Principles on Business and Human Rights, so that our employees are prepared to respond in the most effective and informed manner when modern slavery is discovered.

The Remediation Framework sets out a series of steps, with the aim to safeguard the victim including the gathering of information, corrective action, decision making for referring to national authorities or expert organisations, rehabilitation, restitution and evaluation.



5.1.6 Training

Relevant Interactive staff, including relevant staff of subsidiaries, complete annual training on Modern Slavery including what is Modern Slavery and how to identify risks of Modern Slavery both internally and within the supply chain.

All staff have to review and sign off on policies relevant to their role and undergo Code of Conduct training annually. We also provide annual WHS training which includes raising awareness and how to use our Whistle-blower Service.

6. Assessing the effectiveness

Risk Management

Interactive has a mature risk management and reporting process led by the Risk & Compliance Department. This process manages business risk, including potential modern slavery and human rights risks. All risks are captured in an online risk management application that tracks both risk and risk treatment plans. The Risk and Compliance Team monitor these risks and provide reporting to the Executive Leadership Team and the Interactive Board. This risk process and the effectiveness of risk management is independently audited during ISO9001 and SOC audits.

The evaluation of the effectiveness of actions will include an annual review of:

- Risk register and modern slavery risk assessment to identify any changes over time, such as risks relating to new products or suppliers.
- The responses to our Modern Slavery Supplier Questionnaire and steps taken to scrutinise elevated risk suppliers.
- The number and nature of reports submitted using the FairCall Whistle-blower service.

Any corrective actions or remediation that has taken place as per the Remediation Framework to ensure the learnings can be used in the prevention of future cases. If no cases of modern slavery are found, we acknowledge that this does not mean that we do not have modern slavery in our operations or supply chain and continued diligence is required.



7. Interactive Subsidiaries



7.1. How we have consulted with ErasetT

ErasetT, has a simple supply chain with three tier one suppliers. We have ensured ErasetT are consulted, informed, and understand modern slavery and the risks in their supply chain by:

- Discussing the Commonwealth Modern Slavery Act 2018 and its relevance to both Interactive and ErasetT
- Discussing why we are required to publish a Modern Slavery Statement
- Consulting with the operations team and management teams' modern slavery risks currently present or which may present at a later date and what these risks mean to both Interactive and to ErasetT
- What to do if a modern slavery risk is identified
- Providing an overview of the Whistle-blower Process and how to access the service
- Providing training on what is modern slavery, how to identify risks and reporting potential cases of modern slavery
- Annual process review and continuous improvement

In addition to the above, ErasetT have implemented and maintained an annual review of modern slavery risk which includes a review of the Supplier Code of Conduct to ensure all new suppliers are completing the required questionnaires to identify any potential modern slavery risks which may have presented or changed during the year.



Interactive welcomes Slipstream effective 1st July 2023.

The acquisition of Slipstream was announced in March 2023 and will become fully effective 1st July 2023. An initial review of modern slavery risk within Slipstream and its supply chain has deemed Slipstream has low risk of modern slavery.

Post acquisition completion and during the 2024 financial year, Slipstream and Interactive procedures will be integrated. This will include modern slavery processes and procedures.

8. Additional information


For more information contact:

Risk and Compliance Team - compliance@interactive.com.au

<https://www.interactive.com.au/compliance/>.

This statement is approved by the Board of Interactive Pty. Ltd.

Signed,

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Brendan Fleiter
Executive Chairman