



## Modern Slavery Statement: December 2021

This statement covers Mwave's commitment towards eradicating Modern Slavery from our supply chain and services and the clients that we serve.

### Introduction

This is the second release of Mwave's Modern Slavery Statement to ensure we are compliant with the Modern Slavery Act 2018 (Cth). It sets out the actions taken by Mwave to address and support the avoidance of Modern Slavery and Trafficking risks posed to our company and supply chain for the calendar year ending 31 December 2021.

Mwave is committed to maintaining and enhancing our systems and processes to avoid complicity in modern slavery or human rights violation related to our operations, supply chain and services.

We understand that modern slavery can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking, workplace abuse and human trafficking.

### About Mwave

Mwave operates through its legal operating entity, Esel Pty Ltd (ABN 38 114 422 507) and is a wholly owned subsidiary of its holding company Mwave Holdings Pty Ltd (ABN 64 645 692 833). Mwave is Australia's leading online tech retailer and is well-renowned amongst PC enthusiasts and the gaming community. With over 15 years of experience, Mwave has developed a strong reputation in its technical expertise, shopping convenience, and professional customer service. Mwave does not tolerate in any capacity any forms of slavery or human trafficking in our company, supply chain or services.

Mwave is located in Lidcombe, New South Wales with a headcount of approximately 170 employees. We supply a range of customers B2B and B2C, with over 500 brands and 28,000+ products.



### Governance and policy framework

Mwave is committed to high standard of corporate governance. Our board, executive and relevant committees provide the direction and leadership to implement appropriate levels of governance for our organisation consistent with our overarching company strategy. This includes ensuring that in dealing with suppliers, our decisions and actions are based on transparency, integrity, responsibility, and performance which promotes long term sustainability and ongoing success of our company.



Mwave's Core Values and Standards are:

- We own our own space and take accountability
- We are customer and solutions focused and we continually challenge ourselves
- We are empathetic, respectful and value all people
- We are collaborators and transparent in our dealings

Every Mwave employee and associated Mwave stakeholders are expected to always exhibit the highest ethical standards and to operate within all policies and laws that apply to our company.

Mwave has implemented policies and procedures which support, along with our governance and expected moral and ethical standards, the human rights of our stakeholders (employees, suppliers and associated representatives) and provides a framework for protection against slavery and human trafficking.

These documents set out our ethical and core moral values and standards that guide the way we treat our employees and the way we work with our customers, suppliers and other stakeholders.

Our policies and procedures include:

- Code of Conduct and Ethics
- Modern Slavery Policy
- Whistle-Blower Policy
- Anti-Discrimination, Harassment & Bullying Policy

## **Our operations & supply chain**

Our supply chain consists of purchasing branded products, manufactured by vendors, through direct arrangements with intermediate distributors, suppliers, and partners and then marketed and sold to retail and business consumers through our web platform. Each partner has a trading agreement managed by our procurement team along with oversight provided by our executive management team. We provide both products and services to our customers.

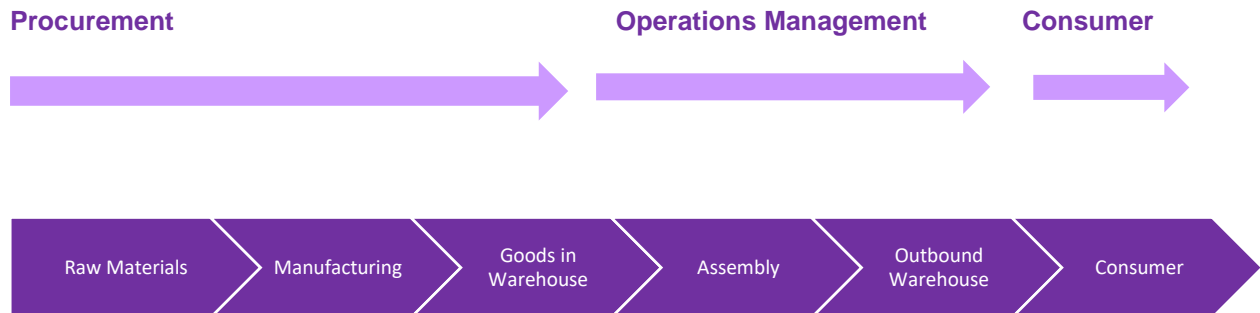
The key activities in our supply chain consist of the following broad steps:

- Manufacturer research and establish market opportunities for their products.
- Manufacturer's research and development teams plan out a design concept, factory tooling, production costing, marketing and distribution for their products.
- Raw materials are procured and sourced by the manufacturer.
- Manufacturer uses mass production capabilities including tooling, employed human resources and automated technologies to produce and package the product(s).
- Outbound shipment of product are sent to intermediate distributors, suppliers and partners.
- Intermediaries provide product lists with pricing to Mwave.
- Mwave's product and procurement teams select suitable products to be listed, stocked at Mwave's warehouse and distribution centre, and sold through our website.
- Delivery of the product is organised by Mwave to its retail and business customers.
- Mwave provide after sales customer service and support to the consumer.



- Mwave ensures compliance with the Australian Competition and Consumer Commission (ACCC) laws and regulations for all warranty matters.
- Mwave assembles custom PCs using directly sourced labour and branded products.

## Supply Chain Management



## Actions taken to assess and address risk of modern slavery practices

### Policies and procedures

All relevant policies and procedures have been updated and/or implemented to minimise any risks posed to the company associated with slavery and human trafficking.

Our Code of Conduct outlines our core values and standards and sets the expected behaviours for all employees, contractors, and suppliers.

Our Modern Slavery Policy outlines our commitment to assess and address risks associated with modern slavery in accordance with the company's Code of Conduct and sets out our reporting obligations under the Modern Slavery Act 2018 (Cth).

Our Whistle-Blower Policy encourages all employees to make good faith reports of identifying and calling out any misconduct and harm to employee, consumers, and the community within the company to an identified executive leader. The policy also describes the process that will be followed by the company in evaluating and investigating such matters. Finally, the Whistle-Blower Policy also protects whistle-blowers when they do make good faith reports under the *Corporations Act 2001* and provides the whistle-blower with legal rights and protections.

Our Anti-Discrimination, Harassment & Bullying Policy supports diversity in our company and ensures that our workplace is free and sets out our no tolerance stance on discrimination, bullying and harassment at Mwave.



## Assessment of risk in our supply chain

### Awareness & Education

All employees are participating in educational policy sessions to educate and make them aware of Modern Slavery and to ensure they are aware of Mwave's Modern Slavery Policy.

### Supplier assurance and due diligence

We have developed a vendor/supplier onboarding checklist to assist our internal product managers when acquiring and onboarding any new supplier. This checklist consists of a series of questions to ensure suppliers support our business requirements through best practice compliance and governance. This includes documentation review and signoff by an authorised executive or legal representative.

Furthermore, each of our vendors/suppliers will complete our modern slavery act questionnaire to acknowledge and affirm they are complying with or moving towards the compliance and adherence to the Modern Slavery Act 2018 (Cth).

Finally, we have undertaken reviews of our existing vendors and suppliers and created an internal register to record and monitor compliance with the Modern Slavery Act 2018 (Cth). Mwave commits to undertaking an annual review of our internal register to ensure compliance is tracked throughout our supply chain

## Assessing the effectiveness of our actions

The effectiveness of our actions will be assessed by monitoring and analysing:

- Employee completion of ongoing Modern Slavery Policy educational sessions over the next 12 months.
- Supplier/Vendor responses to the onboarding checklists to ensure compliance with the Modern Slavery Act 2018 (Cth).
- Modern Slavery Statements of vendors/suppliers including compiling and holding records of their statements within our internal supplier register to indicate adherence and compliance through our supply chain.
- Ongoing annual review of our existing vendor and supplier documentation to ensure compliance and adherence throughout our supply chain to the Modern Slavery Act 2018 (Cth).

## Future commitments

During FY 21-22 we will focus on the following key activities:

- Implementing Modern Slavery awareness and education within our company induction program.
- Purchasing and procurement team to make it mandatory that any new onboarding of vendors and suppliers affirm their compliance with the Modern Slavery Act 2018 (Cth).
- Commitment to monitoring public watchlists provided by the Australian Federal Police and cross-checking against our vendors/suppliers with appropriate review and action where non-compliance is discovered.



- Ongoing annual review of our existing vendors and suppliers to ensure compliance with and adherence to the standards set out in the Modern Slavery Act 2018 (Cth).
- Review our commitments yearly to maintain alignment and best practice in compliance with the Modern Slavery Act 2018 (Cth).