PLE Computers
Modern Slavery Statement FY2023

Introduction

PLE Computers is pleased to submit here our third annual Modern Slavery Statement which demonstrates our continued commitment to countering modern slavery and complying with the Australian *Modern Slavery Act (Cth)* 2018.

PLE Computers is a leading retailer of custom-built computers and computer components. Established in 1991, PLE Computers is proudly Australian-owned and family-operated, and we aim to provide exceptional products at affordable prices. At PLE Computers, we pride ourselves on delivering best-in-class customer service for all stages of each sale. We aim for each of our customers to be completely satisfied with our products and services, and we focus on providing value to the communities in which we operate. These priorities are reflected in our eight core values which guide decisions and make PLE Computers unique:

Figure 1: PLE Computers' mission statement and core values

PLE Computers acknowledges and welcomes the recent review of the Australian Modern Slavery Act, including the recommendations tabled in Parliament in May 2023. We understand the recommendations for government consideration include requirements for entities to implement stronger counter-slavery initiatives through amendments to the reporting threshold and possible penalties for specific non-compliance. While too soon to know which of these recommendations the government will enact, PLE Computers is monitoring closely and supports a maturation of Australia's efforts to combat modern slavery here and abroad.

PLE Computers: Our Corporate Structure, Operations and Supply Chain

The Reporting Entity and Our Corporate Structure

This Modern Slavery Statement is submitted by PLE Computers Pty Ltd (ABN 48 051 046 596) as the only reporting entity under the Australian *Modern Slavery Act 2018* (Cth) (MSA). PLE Computers is a privately-owned technology company operating in Western Australia (WA) and Victoria (VIC).

PLE Computers' internal governance structure comprises of the Board of Directors who are responsible for formulating our strategic direction, approving capital expenditure, establishing our management framework, and ensuring risk management and legal compliance. The Board sets the appropriate ethical standards and is responsible for implementing them throughout the business. The Board formally meets every quarter, while managers meet monthly.

Our Operations and Supply Chain

Our operations include five retail stores across WA and VIC, one distribution centre in each of the two states, as well as an online store. Our products are shipped Australia-wide, and customers can also purchase and pick up in-store.

PLE Computers has analysed our supply chains for modern slavery risk two years in a row now. This current slavery statement demonstrates the slight changes in the composition of our supply chain from FY2021-22 to FY2022-23.

PLE Computers currently has approximately 470 tier-1 (direct) suppliers spread across 13 countries and four continents: Oceania, Asia, North America and Europe. The breakdown of suppliers by country is depicted in Figure 2.
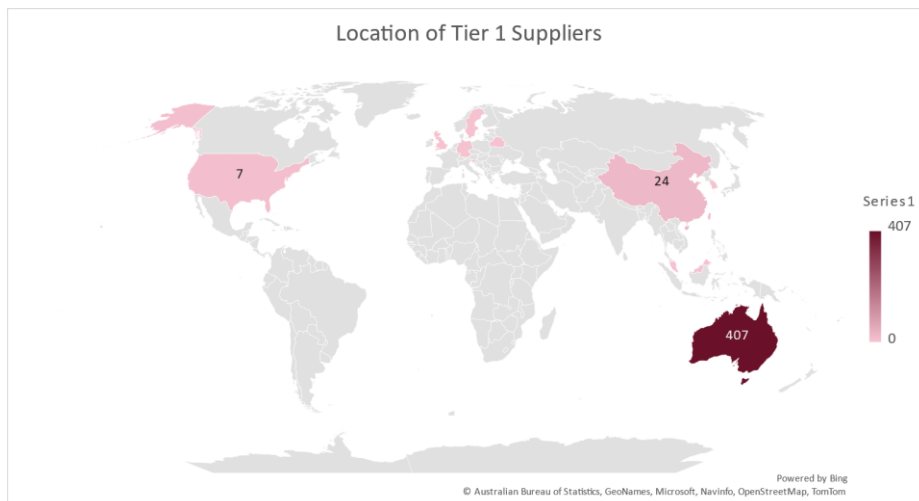

Figure 2: Geographic distribution of tier-1 product supplier FY23

Our products continue to predominately originate from a group of key strategic suppliers which include manufacturers, factories, and distributors from around the world. These tier-1 product suppliers are mostly in Taiwan and Australia, but also include Hong Kong, the United States, and parts of Europe, as depicted in Table 1 below.

Table 1: Geographic distribution of tier-1 product suppliers*

Country of Tier-1 Supplier	Manufacturer	Factory	Distributor
Belarus	-	1	-
China	1	7	-
Germany	-	1	-
Hong Kong	4	1	1
Singapore	1	-	-
Slovenia	1	-	-
Taiwan	7	1	-
United Kingdom	2	-	-
United States	4	-	1

*This data remains the same as the last two reporting periods (FY2020-21 and FY2021-22)

To maintain our transparency processes across our supply chain, we continue to collect data such as the supplier's number of years in business, shelf-readiness of products, freight arrangements, trademark certification, and electrical and product safety from our suppliers at onboarding.

Modern Slavery Risks

Similar to last year, PLE Computers has undergone another review of inherent slavery risks in our operations, supply chain, and the industry we work in. This is based on the potential to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains, as defined in the MSA's Guidance for Reporting Entities.

In general, modern slavery risk remains present in the technology industry, especially for products with complex supply chains that include rare earth materials, some of which are sourced from high-risk geographies. PLE Computers is exposed to some of this upstream risk by retailing a wide selection of electronic products and accessories. This risk predominates beyond our tier-1 (direct) suppliers and is concentrated further upstream at several points along the electronics supply chain, namely at raw material mining, material processing, and componentry manufacturer and assembly.

The newly released Walk Free Foundation's Global Slavery Index (GSI) 2023 identifies electronics among Australia's at-risk imported products, showing China and Malaysia as primary high-risk source countries (page 154 of GSI). These risks were also detailed in GSI's previous 2018 report.

Due to our business model and industry, not all our slavery exposure risk is offshore. PLE Computers, like all Australian organisations, also has some risk in our onshore operations. While this risk remains relatively small, PLE Computers acknowledges the increase in overall slavery risk within Australia, based on the updated

GSI 2023. From 2018 to 2023, the estimated prevalence ratio of modern slavery (per 1,000 people) in Australia increased from 0.8 to 1.6; from some 15,000 people to 41,000 people. This increase is mostly concentrated in transportation, subcontracting, domestic work, agricultural work, outsourced cleaning, and branded clothing, among others. We continue to mitigate these operational risks in several ways, including our policy suite, our strong company culture, and our focus on the eight core values which emphasise respect and inclusiveness for all staff. We also draw upon external human rights and country slavery advisory from Ndevr Human Rights to guide our processes and controls. PLE Computers is proud of our long, trusting, and transparent relationships with our staff.

To further understand PLE Computers' inherent risks within our supply chain, we conducted our second detailed supplier risk assessment. This assessed all 469 of our tier-1 suppliers in financial-year 2023 by three main factors: geographic risk, industry/sector risk, and relevant risk proxies for the Australian context (e.g. estimated size of the tier-2 supply chain). This methodology of our supply chain slavery risk assessment continued to be based on work developed by Ndevr Human Rights, a third-party human rights advisory that specialises in counter-slavery support and supply chain slavery risk measurement.

This supply chain assessment gives us analytical visibility across our supply chain showing where the main risks sit and enabling comparability year on year. We found that some 87 percent (407 suppliers) of our tier-1 vendors are registered in Australia, which has a relatively low geographic risk rating for modern slavery (2.9/10). This risk rating is based upon Ndevr Human Rights methodology which aggregates six global indices and datasets, including the Global Slavery Index, US Trafficking in Victims Protection Act reports, ITUC Global Rights Index, among others. Of our remaining 62 suppliers outside of Australia, we found that ~46 percent are in relatively low-risk countries (less than 4/10), while just over half are in higher risk countries (over 4/10). This breakdown is shown in table 2 below.

Table 2 – identified risk by geographic location

Country	No. of suppliers	2023 Risk (0-10)	2022 Risk (0-10)
Australia	407	2.0	1.7
China	24	7.9	7.9
Taiwan	14	2.6	2.2
United States of America	7	3.4	2.8
Hong Kong	7	4.2	4.3
Singapore	2	3.0	3.2
United Kingdom	2	2.6	2.3
Belarus	1	6.4	6.2
Malaysia	1	5.3	5.7
Germany	1	1.2	2.1
Slovenia	1	3.0	2.5
South Korea	1	4.1	3.7
Sweden	1	0.8	1.1

Since our previous statement, Ndevr Human Rights has updated their risk rating, based on newly available data sets. This has shown changes in overall country risks scores, as seen above in table 2. Of the top 5 countries with most suppliers for PLE Computers, the following changes should be noted:

Increased in Country Risk Rating
- Australia
- Taiwan
- United States of America

No Changes in Country Risk Rating
- China

Decrease in Country Risk Rating
- Hong Kong

Overall, most of PLE Computers' tier-1 supply chain remains located in relatively low-risk countries. However, our second tier and beyond holds a higher degree of risk. For this reason, we aim to increase our visibility further down the supply chain towards source, over time, likely beginning with a selection of key suppliers and building from there.

Considering 87 percent of our suppliers are in Australia, it was important for the supply chain assessment to go beyond a geographic assessment to also evaluate the industry and sector risk of our suppliers. The largest industry risk grouping we identified includes 195 suppliers providing commercial and professional services across our operations. The second largest risk grouping provides technology hardware and equipment. We also identified several other smaller industry groupings worth noting, including transportation, telecommunication services, and others, as depicted in Table 3 below.

Table 3 – identified risk by industry grouping

Industry grouping	No. of suppliers
Commercial & Professional Services	195
Technology Hardware & Equipment	134
Media & Entertainment	30
Transportation	21
Consumer Services	20
Capital Goods	12
Software & Services	10
Consumer Durables & Apparel	9
Telecommunication Services	8
Materials	7
Utilities	6
Health Care Equipment & Services	5
Retailing	5
Banks	2
Diversified Financials	2
Automobiles & Components	1
Insurance	1
Real Estate	1

We will use these industry and sector risk results to guide the future engagement process and mitigation steps. PLE Computers has developed a supplier assessment questionnaire (SAQ) which will be rolled out to a subset of our high-risk and strategic suppliers to increase our understanding of their risk profiles and mitigation measures, in FY2023-24.

Addressing the Risks of Modern Slavery

Governance & Culture

The culture at PLE Computers is strongly driven by the Directors' core values and respect for every individual. We cultivate an environment of openness and inclusivity to ensure all our staff feel a sense of belonging. Our Board of Directors has ultimate responsibility for PLE Computers' governance, formulating strategic direction, and ensuring the integrity of risk management. The Board establishes the company's management framework and priorities.

Our Board is committed to engaging emerging issues and is responsive to developments that call for action, including modern slavery risks. In line with this commitment, we have taken steps to further embed modern slavery within our governance and procedures. This includes setting the issue as an agenda item for briefing to the entire Board before the end of every reporting year, with an update on actions taken to date and priorities for the next year. Our internal Modern Slavery Working Group established in FY2021-22 meets bi-monthly and is staffed by our General Manager and Compliance Manager who is responsible for driving our counter-slavery response. Our commitment and counter-slavery actions will continue to be communicated to managers and staff to ensure awareness of the issue and the required responses across the company.

Policies & Contracts

PLE Computers has a suite of policies and supporting procedures in place which govern relationships and articulate our values and culture. New employees are required to learn and acknowledge these policies through an online portal at onboarding. The following table lists the ones most relevant for countering human rights risks, including modern slavery, amongst our operations and team members.

Table 4: PLE Computers' human rights relevant policies and practices

Policy & Procedure	Purpose
Code of Conduct	Establishes proper conduct and practices, including ethical, moral, and honour codes, essentially laying out our expectations for how team members will behave towards each other and our stakeholders.
Equal Employment Opportunity & Anti-Discrimination Policy	Promotes a safe, equitable, flexible, and respectful workplace free of discrimination, bullying, and sexual harassment.
Workplace Anti-Bullying & Anti-Harassment Policy	Promotes a work environment that is safe and enjoyable for all by outlining inappropriate behaviour that may be considered bullying or harassment.
Workplace Health & Safety Policy	Promotes a safe workplace and ensures that for any identified hazards, appropriate control measures are in place for the health and safety of our staff.
Modern Slavery Policy	Promotes eight core values that support our stance on the issue and lays out our response plan. These core values include: 1. No forced or bonded labour 2. No unlawful or dangerous child labour 3. Health and safety 4. Wages and benefits

Policy & Procedure	Purpose
	5. Lawful working hours 6. Freedom of association and collective bargaining 7. No discrimination 8. No harassment
Whistleblower Policy	Ensures any concerns raised regarding any misconduct or an improper state of affairs or circumstances in relation to PLE Computer's business are dealt with effectively, securely, and appropriately.
Grievance Handling Policy	Establishes and ensures awareness of reporting channels that would allow employees to report and escalate concerns, including issues related to discrimination and anything our team members believe to be unjust or unfair.

In addition to these, we have in place a Complaints Handling Policy and a Casual Employment Information Statement to ensure the protection of our employees. At present, our staff bring up any concerns to managers in monthly meetings; managers then escalate concerns to the appropriate senior management. Over time, we see the importance of expanding access to our grievance mechanisms beyond our direct employees. Using the Complaints Handling Policy as a foundation, we intend to improve our complaints and grievances systems by expanding accessibility to stakeholders such as suppliers and their workers. This will likely need to be done in phases and we hope the supply chain risk assessment and subsequent supplier engagement process will reveal meaningful ways to improve and expand our grievance systems.

Additionally, as a result of FY2021-22's successful integration of Waybook software for onboarding and induction processes, PLE Computers continues to ensure the effective introduction of new team members to our company, culture, and commitments.

Supplier Engagement & Management

PLE Computers maintains relationships with our suppliers, both large and small. Many of our suppliers are long-term partners with a high degree of mutual trust and transparent communication. This sets us up well to engage and manage risks within our supply chain, including around modern slavery.

As PLE Computers has now undertaken two annual modern slavery supply chain risk assessments, we are well placed to begin some select supplier engagement in a targeted way. We plan to target engagement on areas of our supply chain with the most risk and where we have the most influence through spend or strategic partnerships. Risk-based engagement methods will include issuing our newly developed targeted questionnaires to continue increasing transparency. From the results of these questionnaires, we can determine what future engagements may be beneficial or required in FY2024-25.

PLE Computers views supplier engagement and management as a collaborative process and we will strive to engage our suppliers as partners to help increase transparency and mitigate potential slavery risks within our supply chain or reduce the vulnerability of workers therein.

Training

In this reporting year, PLE Computers ensured the roll out of our modern slavery training to all current staff as well as new staff as part of their induction process. The trainings focus on a general understanding of the issue globally and in Australia and help to identify modern slavery risks and issues within our operations and supply chain. The training guides staff to respond if an issue arises or they identify a possible risk. We drew upon external standards and resources when developing our training, such as the United Nations Global Compact and the Walk Free Foundation.

PLE Computers is also considering the longer-term design and development of more specific modern slavery training for key functions within the business, such as our procurement staff, as we recognise those functions as essential to a successful counter-slavery response.

Collaboration and Engagement

PLE Computers acknowledges the importance of collaboration for combatting modern slavery. This is an area in which we are keen to make progress over the next reporting cycle. PLE Computers has several strategic suppliers that account for a large portion of our revenue and with whom we already collaborate, including via weekly communications. PLE Computers continues to explore ways to deepen discussion on counter-slavery actions and progression against modern slavery targets with those suppliers, and others we have identified through our supply chain risk assessment.

At PLE Computers are aware that one of the ways in which we can contribute towards progress in combating slavery is by supporting organisations dedicated to protecting vulnerable people and campaigning governments for effective protections. Recognising this, we continue to have a strong track record of supporting charities. During FY22-23 we supported 29 charities, of which 5 actively seek to protect individuals living in modern slavery, including:

- Save the Children
- Catholic Mission
- Red cross
- Caritas
- Salvation Army

We will continue to support charities either domestically, or in overseas locations where our suppliers are based.
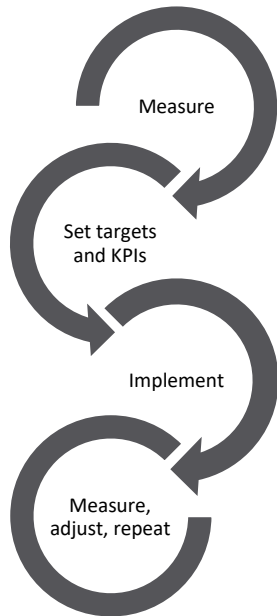
Assessing Effectiveness of Our Actions

PLE Computers acknowledges that Australia's slavery Act calls for responding entities to demonstrate year-on-year improvement in their counter-slavery response. The key to showing this improvement for PLE Computers is assessing the effectiveness of our counter-slavery actions and activities.

We continue using an iterative approach to assess the effectiveness of our actions that will mature and progress over time. In summation, our method is to measure where we are, target where we want to be, implement actions to get there, and then evaluate how well we met our targets before repeating this process. This iterative cycle is depicted in Figure 2 to the left.

It is important to note that PLE Computers will not measure the effectiveness of our actions by the absence of detected slavery or slavery risk, as this could unintentionally engender a culture of avoidance. Instead, our assessments of effectiveness will focus on quantifiable actions and progression beyond a baseline.

Figure 3: Approach to assessing effectiveness of actions

We set out below the targets we set for our organisation in our second statement for FY22-23 and how we performed against those targets. Our targets for the FY23-24 reporting year and longer-term aspirations are also set out below. PLE will continue to report on our progress and effectiveness in future statements.

Modern Slavery Roadmap: Targets & Progression

PLE Computers is committed to progressing our counter-slavery response. This section outlines our progress on FY21-22 targets, our identifies FY22-23 targets and our planned actions and activities to achieve each. Many of these actions correspond to longer-term targets that we will be progressing towards, while others are near-term priorities that have our current focus.

Table 5: PLE Computers' FY22-23 counter-modern slavery targets and progress

Previous Target	Action	Targeted Deadline	Status
Supplier engagement	Sending supplier questionnaires on modern slavery Collecting more specific supplier data at onboarding	**FY23**	In progress
Supplier Code of Conduct	Supplier alignment with Code of Conduct	**FY23**	To be completed in FY24
Other Policies	Implement Grievance, Complaints and Remediation	**FY23 and beyond**	Partially Complete
Industry engagement	Participation in modern slavery or human rights-related industry initiatives	**Ongoing**	Ongoing

Staff training	Training developed and implemented in induction processes	FY23	Complete
Staff training	Specialised functional training	FY23	Not started
Formalise Board oversight	Annual agenda item for Board of Directors meetings	FY21	Complete in FY23 and Ongoing
Review of effectiveness of actions	Annual tracking of KPIs to measure the effectiveness of counter-modern slavery action	Ongoing	Complete in FY23 and Ongoing
Support for NFP organisations working on protecting vulnerable persons	Support NFP organisations focused on counter-slavery work.	FY23	Complete in FY23 and Ongoing

Table 6: PLE Computers' FY24+ counter-modern slavery targets, actions and commitments

FY24 Target	Action	Commitment	Targeted Deadline
Due Diligence	Conduct human rights due diligence on any unsatisfactory responses to our questionnaire	We will conduct more detailed due diligence on a selection of suppliers that remain high risk after completing our questionnaire (SAQ) or failing to answer the SAQ.	FY24-25
Tier 2 Assessments	Collect at least 5% of tier 2 information	Identify best parts of supply chain (likely by risk + leverage) where PLE Computers can collect tier 2 supplier information. This may be through SAQ's, further supplier engagement, due diligence, or via publicly available information.	FY24
Supplier engagement	Sending supplier questionnaires on modern slavery Collecting more specific supplier data at onboarding	We will send out recently developed questionnaires to select existing suppliers in FY24 and update our onboarding process for new suppliers to ensure modern slavery-related data and information is captured.	New Deadline FY24
Supplier Code of	Supplier alignment with Code of Conduct	We will begin onboarding suppliers to our Code of	New Deadline

FY24 Target	Action	Commitment	Targeted Deadline
Conduct and other Policies	and Contracts	Conduct and updating Contract terms.	**FY24**
	Grievance, Complaints and Remediation	Broaden our accessibility for complaints by our customers, and suppliers' workers and ensure our policies expressly stipulate human rights and modern slavery as types of grievances covered by our Policies	**New Deadline FY24 and beyond**
Industry engagement and collaboration	Participation in modern slavery or human rights-related industry initiatives	We will investigate industry engagement opportunities with a view to participate in regional, national, and global initiatives where we can add value.	**Ongoing**

PLE Computers will be reporting on these targeted actions and our progress against each in subsequent Statements. We consider them our early steps and initial contribution to the identification and eradication of the global issue of modern slavery.
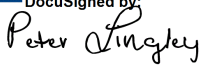
Consultation

PLE Computers does not own or control any other entities. This reporting criteria is, therefore, not applicable.

Approval and Signature

This statement was approved by the Board of Directors of PLE Computers in their capacity as the principal governing body of the reporting entity on 18th December 2023.

This statement is signed by Peter Lingley in his role as the Managing Director of PLE Computers.

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Peter Lingley

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Peter Lingley

Managing Director and Chairman of the Board of PLE Computers

18 December 2023

Annexure: Mandatory criteria

The mandatory reporting criteria in the Modern Slavery Act are addressed in our Modern Slavery Statement as indicated in the table below.

Mandatory criteria	Page number(s)
a) Identity of the reporting entity	2
b) Description of entity structure, operations and supply chain	2
c) Description of risks of modern slavery practices in the operations and supply chain of the reporting entity	3 - 5
d) Description of actions taken to assess and address these risks, including due diligence and remediation processes	6 - 8
e) Description of how the reporting entity assesses the effectiveness of these actions	9 - 11
f) Description of the process of consultation on the development of the statement with owned or controlled entities	Do not own or control any other entities
g) Any other information the reporting entity considers relevant	Not relevant