

Modern Slavery Statement

Year ending 28 February 2022



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About Logicalis Australia

The Logicalis Australia Group of entities (collectively referred to as 'Logicalis Australia') includes Australian entities Logicalis Australia Logicalis Holdings Pty Ltd, Logicalis Australia Pty Ltd, Corporate Network Integration Pty Ltd and Logicalis Asia Pacific MSC Sdn Bhd, domiciled in Malaysia.

Logicalis Australia Holdings Pty Ltd is a proprietary company limited by shares, incorporated and domiciled in Australia. The immediate parent entity is Logicalis International Limited (an entity incorporated in the UK) and the ultimate parent entity is Datatec Limited (an entity incorporated in South Africa).

Logicalis Australia is part of the Logicalis Group, a global company operating in 31 countries, employing more than 7,000 staff with global revenues of USD\$1.66bn for the year ending 28 February 2022.

Logicalis Group ("**Logicalis**") is part of the Datatec Group ("**Datatec**"). Datatec is an international ICT solutions and services group operating in more than 50 countries across North America, Latin America, Europe, Africa, Middle East and Asia-Pacific. Datatec's offerings span the technology distribution, integration and consulting sectors of the ICT market. Datatec's shares are listed on the Johannesburg Stock Exchange (JSE). The largest shareholders are South African investment managers which are among more than approximately 3,500 shareholders spread across the world.

Datatec's operating divisions includes Logicalis, Westcon International, Analysys Mason and Datatec Financial Services. In addition, Datatec's Corporate function provides business support and consulting services to the respective divisional management functions. The Logicalis Division (of which Logicalis Australia is a member) is headquartered in the United Kingdom.

All Datatec entities operate on a financial year which commences 1 March each year.



Our Statement

This joint statement, pursuant to the Australian *Modern Slavery Act 2018* (Cth), sets out the actions taken by Logicalis Australia to address modern slavery and human trafficking risks in our business and supply chain during the financial year ending 28 February 2022 and through the year to date commencing 1 March 2022 until the date of this statement.

Logicalis Australia defines Modern Slavery as including (but not being limited to) trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

The worst forms of child labour are namely when children are subjected to slavery, or similar practices, or engaged in hazardous work.

Logicalis Australia, the Logicalis Group and its ultimate parent, Datatec Limited, recognises that Modern Slavery practices can have severe, wide-ranging and long-lasting impacts on individuals and communities, as well as stakeholders who may be involved in the direct operations of our business, including our customers.

Logicalis Australia take a proactive and zero-tolerance approach to Modern Slavery across its operations, and within the separated jurisdictions in which it operates. This is communicated and regularly reinforced to our employees and contractors in our policies and training regimen.

Logicalis Australia is headquartered in Melbourne, has offices in both Melbourne, Sydney and Cyberjaya (Malaysia), and has 306 employees and contractors located in Australia and Malaysia.

Logicalis Australia earns annual revenues of approximately \$110m AUD. More than 95% of its income is generated through business transactions with Australian companies and organisations.

To meet the needs of its corporate and public sector customers, Logicalis partners with leading multinational technology vendors typically headquartered in the United States of America or the United Kingdom, and has specialised solutions for enterprise and medium-sized companies in vertical markets covering financial services, telecommunications, media and technology, education, healthcare, retail, government, manufacturing and professional services, as well as other sectors, helping customers achieve the required business outcomes from IT investments.

Logicalis companies purchase from both distributors and technology vendors, as well as purchasing through its related party distributor, Westcon International.

Logicalis' operating companies, such as Logicalis Australia, are typically established in a jurisdiction to sell into the local market. They purchase IT products predominantly from third party technology vendors and distributors and sell to third party customers. The majority of Logicalis Australia's purchases are therefore procured from entities based within Australia (including key vendors listed above), though a portion (less than 5% in both number of suppliers and value of supplies purchased) are procured from entities domiciled outside of Australia.

Most of these companies employ staff with the relevant skill sets to be able to sell professional services in addition to product sales. Almost all professional and Managed services are sourced in-house or from local IT contractors (in the case of Logicalis Australia, this is within Australia and Malaysia), though a small portion may be provided by a 'centre of excellence' (CoE) in another operating company within the Group. In such circumstances the CoE charges the Logicalis sales entity on a cost-plus basis for the services provided. These transactions are low in volume.



All Logicalis employees are required to annually complete an interactive on-line training course about our Code of Conduct, and to pass a test to show that they have understood it. The training course encourages employees to identify and report any potential breaches of our Code of Conduct, and gives details of our independent whistleblowing hotline. The training and Code of Conduct are regularly reviewed and updated.

Any breach of the Code of Conduct is reported by Logicalis Australia to Logicalis Group, including any non-compliance with modern slavery legislative requirements. Any breaches reported will also be advised to the Datatec ARCC (Audit Risk Compliance Committee) along with the remedial actions undertaken.

Following a review of Logicalis Australia's business operations and relationships with our supply chain it was concluded that we do not cause or contribute to modern slavery risk. Further, we consider that the risk of modern slavery occurring in our first-tier supply chain is low because most of our major suppliers are large, industry leading organisations who have adopted their own modern slavery policies and procedures. The processes followed with regard to assessing such risks are outlined below.

As part of our efforts to monitor and reduce the risk of modern slavery occurring within our supply chains we require all new suppliers to comply with our Code of Conduct, Anti-Bribery policy and Supplier Onboarding Policies. This includes completion of the Logicalis Australia *Modern Slavery in Supply Chains Survey* which includes 15 questions covering the following areas:

- Whether the supplier entity complies with modern slavery laws within their jurisdiction
- Compliance with key elements of the Australian modern slavery laws
- Questions relating to Supplier Management, Employment Practices and Other Processes

Each survey response is evaluated by Logicalis Australia prior to the entity being setup as an authorised supplier to Logicalis Australia and commencing transacting. Should a prospective supplier indicate an area of concern with regard to modern slavery, Logicalis Australia will not conduct business with them until the concern is resolved.

Existing suppliers are also required, annually, to complete a supplier update form to ensure all supplier details remain correct and up-to-date and must complete the Logicalis Australia Modern Slavery in Supply Chains Survey every 3 years.

If the reply from an existing supplier indicates an area of concern, the company intends to recommend the immediate ceasing of purchasing from the supplier until the issue has been adequately remediated by the supplier. If the concern cannot be remediated by the supplier within 30 days, a recommendation will be made to the Logicalis Australia Chief Executive Officer to cease all future transactions with the supplier. Any reinstatement of the entity as a supplier to Logicalis Australia will require the onboarding process to be completed, with evidence that the issues identified as requiring remediation have been effectively addressed.

The questionnaire process was completed for the year ending 28 February 2022 and the requisite responses were received from suppliers representing more than 80% of Logicalis' supplier spend (which excludes labour and related on-costs).

Whilst there is no direct evidence that we are directly linked to modern slavery through our supply chain, the potential of modern slavery in our extended supply chain exists and these risks should be continually and regularly reviewed. The company's Modern Slavery Risk Committee meets regularly to oversee the company's compliance with modern slavery requirements and can convene on short notice at other times should a material non-compliance be detected.

Logicalis Group Limited has issued a statement pursuant to Section 54 of the Modern Slavery Act 2015 which remains current as of the date of lodgement of this Modern Slavery statement by Logicalis Australia. Logicalis International Limited (Logicalis Australia Holdings Pty Ltd's parent) is also subject to this statement, issued by its parent. This is provided in full further below.

This joint statement was prepared by Logicalis Australia Holdings Pty Ltd with the intention that it apply to Logicalis Australia Holdings Pty Ltd and all entities within Australia that it owns and controls. It was approved by the Board on 30 August 2022. The entities that are owned and controlled by Logicalis Australia Holdings Pty Ltd have endorsed and adopted this Statement and are following it.

Should you have any queries or feedback in relation to this statement, please contact the Company Secretary via email: tim.reddoch@au.logicalis.com.

COVID19

In recent times, the world has experienced the COVID19 pandemic, which has caused significant disruption to economies worldwide, with impacts on the ability to work within office environments, ability to travel, product availability and lead times amongst the business areas impacted broadly across commercial enterprises. We recognise that these conditions may have increased pressure on vulnerable people to experience or be exposed to the risk of exploitative practices. Logicalis Australia acknowledges that it must remain vigilant in assessing the impacts and potential impacts of the pandemic, investigate any potential modern slavery conditions that may be created and take action where required.

Logicalis Group Policy

Logicalis Group Limited, domiciled in the United Kingdom and the parent of the Logicalis Australia Group of entities, has issued the following statement pursuant to Section 54 of the Modern Slavery Act 2015. As a member of the Logicalis Group, Logicalis Australia actively endorses the statement and the ongoing enforcement of the principles and activities prescribed within the below Statement at all times.



LOGICALIS GROUP LIMITED

STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

Introduction

Logicalis Group Limited recognises that modern slavery practices can have severe, wide-ranging and long-lasting impacts on stakeholders and is therefore committed to preventing acts of modern slavery and human trafficking from occurring within its own business and within its supply chain and expects its suppliers to adhere to the same standards.

Structure of the organisation

Logicalis Group Limited is a subsidiary of Datatec plc and its ultimate parent company is Datatec Limited, a company incorporated in South Africa and listed on the JSE Limited, Johannesburg, South Africa.

Logicalis Group Limited and its subsidiaries (the "Group") work with a range of suppliers from major manufacturers and distributors of IT equipment and services to smaller organisations providing services or products.

Policies

As part of Group's commitment to combating modern slavery, we have adopted The Ten Principles of the UN Global Compact, and in particular the sustainable supply chains: resources and practices detailed in the Responsible Business Alliance (formerly Electronic Industry Citizenship Coalition) Code of Conduct ("The UN Principles"). ([Code of Conduct 7.0 \(responsiblebusiness.org\)](#))

The UN Principles include obligations relating to the rights of individuals to freely chose employment, restrictions on the employment of young workers, prohibitions on excessive working hours, compliance with relevant laws relating to pay and benefits, humane treatment of workers and the prohibition of discrimination on grounds of race, colour, age, gender, sexual orientation, ethnicity or national origin, disability, pregnancy, religious belief or union membership. The UN Principles expect us to require our next tier supply chain to comply with it too.

We also comply with Datatec Code of Conduct which applies across the Logicalis Group. This requires us, among other things, to only do business with partners who share our ethical principles; to treat our employees with respect and fairness at all times; not tolerate any form of harassment or discrimination and to source all products without unlawful discrimination and in a manner supportive of mutually beneficial, long-term relationships. The Logicalis Code of Conduct includes whistleblowing procedures.

Regular reporting of any breaches of the Code of Conduct is completed by Logicalis Group, including any non-compliance with modern slavery legislative requirements. Any breaches reported will be advised to the Datatec ARCC (Audit Risk Compliance Committee) along with the remedial actions undertaken.

In addition, this year the Logicalis Group Board approved the constitution of a Social and Ethics Committee required to monitor the activities of the company in areas such as social and economic development, good corporate citizenship, labour and employment, and the environment, health and public safety.

Suppliers

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains our Group is required to ensure that supplier contracts with all new suppliers comply with our Code of Conduct. In addition, guidance has been issued to all our affiliates in relation to the on-boarding of new suppliers and accordingly, our affiliates are to consider compliance with international laws (including modern slavery) in their appraisal of suppliers.

Risk and compliance

The Group regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain. We consider that the risk of modern slavery occurring in our first-tier supply chain is low because most of our major suppliers are large, industry leading organisations who have adopted their own anti-slavery policies and procedures.

Training

All of our employees are required to complete annually an interactive on-line training course about our Code of Conduct, and to pass a test to show that they have understood the Code. The training course encourages employees to identify and report any potential breaches of our anti-slavery policies and gives details of our independent whistleblowing hotline.

COVID-19

The COVID-19 pandemic continued to cause significant disruption to economies worldwide, with impacts on the ability to work within office environments, ability to travel, product availability and lead times amongst the business areas impacted broadly across commercial enterprises. We recognise that these conditions are evolving as the world adjusts and there may continue to be increased pressures on vulnerable people to experience or be exposed to the risk of exploitative practises. Logicalis acknowledges that it must remain vigilant in assessing the impacts and potential impacts of the pandemic, investigate any potential modern slavery conditions that may be created and take action where required.

Further actions

The Group continually takes steps to minimise the risk of incidents of modern slavery and/or human trafficking occurring by ensuring suppliers confirm that they have complied with our Code of Conduct, and where necessary conduct audits on smaller suppliers in the first-tier supply chain.

Signature

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Logicalis Group's Limited's slavery and human trafficking statement for the financial year commencing 1st March 2021 and ending 28th February 2022. The statement also relates to its following subsidiaries:

1. Promon-Logicalis Latin America Limited
2. Logicalis Limited
3. Logicalis Group Finance Limited



Leopoldo Dal Bianco
Company Secretary
Logicalis Group Limited

Date: May 2022