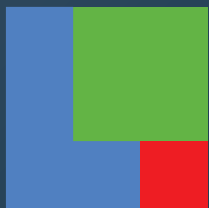


# Legend Corporate Modern Slavery Statement FY24



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[legend.com.au](https://legend.com.au)

# Statement from Bryan Tisher, CEO and Andrew Bullock, Chairman

At Legend Corporation Pty Ltd we are deeply committed to ensuring that human rights are respected and protected across our entire supply chain. As part of this commitment, we have made significant strides in addressing the risks of modern slavery in the reporting period, from July 1st 2023, to June 30th 2024.

We understand that as a business, we have an obligation to conduct our operations ethically and to act responsibly within the global community.

During the 2024 reporting period, we have conducted an external Modern Slavery Gap Analysis to identify potential risks, assess current practices, and determine areas where our policies and procedures can be strengthened to ensure compliance with modern slavery legislation and ethical labour standards. Additionally, we have introduced a Modern Slavery Policy that outlines our commitment to preventing forced labour, human trafficking, and exploitation within our operations and supply chains.

We recognise that tackling modern slavery is an ongoing responsibility and a challenge, but we remain resolute in our efforts to improve. Our commitment to the eradication of modern slavery will continue to be a key priority, and we will continue to work to ensure that our actions reflect our commitment to human rights.

## Process of Consultation

The development of this statement was led by the Procurement Team, which consulted directly with key functions across the Group discussing details of the Modern Slavery Act 2018's reporting requirements; risk analysis, and future action plans. For the preparation of this statement in assessing and addressing the risks of modern slavery practices in the operation and supply chains, the Legend Group entities were actively engaged and consulted. All the Legend Group entities have a common management structure and common management personnel within the Legend Corporation Pty Limited group.

This statement has been reviewed and approved by the Chief Executive Officer and the Board of Directors of Legend in their capacity as principal governing body of Legend Corporation Pty Limited on the 26th November 2024.



**Bryan Tisher, Legend Chief Executive Officer**



**Andrew Bullock, Legend Chairman of the Board**

# Executive Summary

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In compliance with the Modern Slavery Act 2018 (Cth), this Statement outlines Legend Corporation Pty Ltd (**'Legend'**) efforts to assess and mitigate risks related to Modern Slavery within our operations and supply chains. Covering the period from **July 1, 2023, to June 30, 2024** ("FY24 reporting period"), this document highlights our approach, policies, and recent initiatives focused on preventing Modern Slavery across our business.

This report encompasses:

- **Company Overview:** A summary of Legend Corporation's structure, sales units, operations, and supply chains.
- **Policy Framework:** Our commitment to preventing all forms of modern slavery in our operations and supply chains.
- **Risk Assessment:** An evaluation of our suppliers based on risk commodities and countries, as well as reviewing product risk ratings using global sources.
- **Gap Analysis:** A thorough review of our due diligence procedures to assess and manage modern slavery risks in our supply chain, focusing on supplier evaluations, compliance monitoring, and identifying areas for improvement.
- **Ongoing Action:** Commitment to continuous improvement through regular policy updates, alignment with best practices, and ongoing monitoring and feedback.

## Our Approach to Human Rights and Ethical Standards

Legend's approach includes a commitment to upholding human rights across its structure, which encompasses six distinct sales units and a broad range of operations and supply chains. We are committed to continuous improvement, regularly reviewing our policies, practices, and monitoring mechanisms to keep pace with evolving standards and best practices.

## Key Progress and Initiatives in FY24

Over the past year, we intensified our efforts to minimise Modern Slavery risks through a comprehensive approach, including targeted supplier audits and evaluations. The findings showed no evidence of Modern Slavery practices, underscoring the success of our diligent screening process. Additionally, our Group Procurement Team actively manages our Modern Slavery oversight, equipped with a Responsible Procurement policy, Supplier Code of Conduct, and the recently added Modern Slavery policy, to ensure ongoing compliance.

## Independent Gap Analysis by External Experts

To strengthen our approach, we engaged a third-party consultant in FY24 to perform a comprehensive gap analysis of our current Modern Slavery risk management practices. This assessment focused on supplier risk by examining risk categories such as high-risk commodities and regions. The gap analysis identified specific areas for improvement, such as implementing new processes and refining our supplier engagement processes. Based on these findings, we have already taken steps to address these gaps and continue our journey to eradicate Modern Slavery from our supply chains and operations.

## Moving Forward

Our commitment to eliminating Modern Slavery remains resolute. We will leverage insights from our independent gap analysis to implement even stronger measures, refine our risk management processes, and enhance our supplier partnerships to ensure compliance with our standards and policies.

Legend Corporation is dedicated to eradicating Modern Slavery, and we remain vigilant, proactive, and unwavering in our mission to foster a responsible and ethical supply chain for the future.

**Bryan Tisher, Legend Chief Executive Officer**

# About Us

Legend Corporation Pty Ltd (ACN: 102631087, ABN: 69102631087) ("Legend") is an electrical products and industrial solutions supplier. For completeness and compliance with the Modern Slavery Act, where our structure, operations and supply chain (and those of our subsidiary companies) have remained the same since the last reporting period, we have re-stated the same information in this statement.

All of the subsidiary companies described in our structure are operated as sales divisions of Legend and not as independent entities that Legend owns or controls. Legend operates as one business with centralised corporate functions including procurement, accounting, operations, and sales. Legend's modern slavery risk is managed at the group level for all subsidiary companies as presented in this statement.

We are a market leading designer, manufacturer and distributor of products and accessories to the electrical utility, data communications and industrial markets. The company also engineers, tests, calibrates and manufactures integrated circuits (micro-chips) and electronic systems for electrical, defence, biomedical and other high-tech industries. The six sales divisions which operate within the Legend group are renowned for their best in-class customer service and exceptional on- time delivery of up to 30,000 product lines. The group employs 264 permanent staff across Australia and New Zealand in multiple manufacturing sites, independently certified test laboratories, corporate offices and warehouse holding facilities. Legend was privatised by Australian private equity firm, Adamantem Capital, in August 2019.





# Our Structure

This Statement is made by Legend, for itself and its subsidiary companies. Legend was incorporated in South Australia and has its registered office at Hendon, South Australia.

The corporate structure of Legend is shown below. All entities shown in the corporate structure are companies and all subsidiaries of Legend are 100% owned.

**Legend Corporation Pty Ltd**  
ACN 102631087

## (D) Dormant Entities

Legend owns or controls a number of entities that can be described as "dormant" entities and do not engage in any trading or business activities and do not have any operations or supply chains.



# Our Operations and Supply Chain



## CABAC

Since 1982 we have been the benchmark for service, range & quality.

### DESCRIPTION OF OPERATIONS

CABAC is a well-established leader in the electrical industry, employing 150 dedicated staff across multiple locations, including its head office in Sydney and regional sites in Melbourne, Brisbane, Adelaide, Perth, and New Zealand. With a strong presence in the market, CABAC specialises in the design, manufacturing, supply, and distribution of a diverse portfolio comprising over 28,000 product lines. Each product is meticulously engineered to meet stringent industry standards, ensuring high performance and reliability for professional applications.

CABAC's extensive product range is promoted through a nationwide network of electrical wholesale organisations, enabling the company to reach a broad customer base effectively. This distribution network serves various sectors, including engineering construction, residential developments, commercial projects, and major infrastructure builds. CABAC's strong partnerships with wholesalers ensure efficient delivery of quality products to meet the evolving needs of professionals in these industries.

With over 40 years of experience, CABAC has developed a comprehensive lineup of industry-leading products. This includes Australia's largest range of certified compliant electrical connectors, advanced cable jointing systems, specialised tools, high-precision test and measurement instruments, cable management solutions, and structured wiring systems. CABAC also provides low- and medium-voltage power connectivity solutions, as well as copper and fibre connectivity products, ensuring its position as a one-stop provider for the electrical industry's diverse needs.

Additionally, CABAC is proud to incorporate the Bardic brand, a trusted name in emergency and exit lighting solutions. Bardic's range has evolved from early fluorescent battens to advanced LED emergency lighting systems with lithium battery technology, reinforcing CABAC's commitment to quality and safety. By integrating Bardic's expertise in emergency lighting with its extensive electrical product portfolio, CABAC offers clients a seamless, comprehensive solution for both power and safety requirements.

This deep commitment to quality, compliance, and innovation has positioned CABAC as a preferred partner for reliable, industry-standard electrical and safety solutions. With a focus on delivering products and services that professionals trust, CABAC continues to set benchmarks in supporting Australia and New Zealand's electrical industries.

### SUPPLY CHAIN SUMMARY

During the reporting period CABAC had a total spend of just over \$25M spread over 164 suppliers from 22 countries. The principal countries of supply were the People's Republic of China, Belgium, India, Thailand, Taiwan, and Australia. The main products supplied were cabling accessories. Its supplier arrangements were mainly stable and based on long-term relationships.

# Our Operations and Supply Chain



## Ecco Pacific

Providing customers with access to global brands and innovation.

### DESCRIPTION OF OPERATIONS

Ecco Pacific is a focused division within the Legend Corporation family, operating with a small, agile team of two employees, backed by comprehensive support from CABAC's established sales and operations teams. Headquartered in Sydney, Ecco Pacific was launched in November 2020 to concentrate exclusively on serving the Consumer and Trade markets, positioning itself as a specialist in this sector within the broader organisation.

As the youngest division, Ecco Pacific brings a fresh and targeted approach to the business, specialising in providing high-quality products to major "big box" retailers, specialty tool shops, and niche retailers. By securing partnerships with some of the world's leading hardware brands, Ecco Pacific delivers a selection of premium electrical and data solutions, tailored to meet the needs of the modern consumer market.

With a strong presence in both Australia and New Zealand, Ecco Pacific is well-positioned to offer a wide array of electrical and data products to a diverse range of customers. Leveraging Legend Corporation's extensive distribution network and established reputation, Ecco Pacific continues to build its brand within the hardware sector. Its commitment to quality and customer satisfaction allows Ecco Pacific to meet the demands of high-volume retailers and specialty outlets alike, ensuring a responsive and reliable supply of products to the Consumer and Trade markets across both countries.

### SUPPLY CHAIN SUMMARY

During the reporting period Ecco Pacific had a total spend of just over \$600K spread over 5 suppliers from 4 countries. The principal countries of supply were the People's Republic of China, America, and Australia. The main products supplied were hand tools, cable management, and flexible conduit systems.



# Our Operations and Supply Chain



## M+H Power

Your trusted partner for reliable hybrid & off-grid solar solutions.

### DESCRIPTION OF OPERATIONS

M+H Power is a specialised division of Legend Corporation, known for its innovative approach to off-grid power solutions across Australia and New Zealand. With a small but highly skilled team of five, based in Sydney and supported by a New Zealand site, the company provides reliable, tailored power systems for industries such as telecommunications, mining, renewable energy, and emergency services. These solutions are designed to perform consistently in remote and challenging environments where traditional grid access is limited or unavailable.

At the heart of M+H Power's expertise is its ability to design and deliver customised energy systems that meet the unique requirements of its clients. From portable power units for isolated sites to large-scale, self-sustaining infrastructure for industrial use, M+H Power's systems incorporate cutting-edge technologies such as renewable energy integration, advanced battery storage, and intelligent power management. This ensures efficiency, reliability, and sustainability across a wide range of applications.

M+H Power's commitment to local industries is evident in its focus on supporting critical infrastructure and anticipating future energy needs. By working closely with industry partners, the company develops solutions that not only address current challenges but also adapt to evolving technology and market demands. Whether powering remote mining operations, supporting telecommunications during emergencies, or delivering renewable energy solutions to off-grid communities, M+H Power offers practical, dependable systems backed by a seamless service experience.

With a strong presence in both Australia and New Zealand, M+H Power combines technical expertise with an in-depth understanding of local conditions. This allows the company to deliver energy systems that are both robust and fit-for-purpose. Through its focus on innovation, reliability, and sustainability, M+H Power has established itself as a trusted partner, helping industries maintain operations and build resilience in even the most demanding environments.

### SUPPLY CHAIN SUMMARY

During the reporting period M+H Power had a total spend of \$2.5M spread across 41 suppliers from 9 countries. The principal countries of supply were the People's Republic of China, Australia, Spain, and Singapore. The main products supplied were batteries, solar products, and emergency lighting. Its supplier arrangements were mainly stable and based on long-term relationships.



# Our Operations and Supply Chain



## **MSS Data Solutions** We make unique solutions happen.

### **DESCRIPTION OF OPERATIONS**

MSS Data Solutions, with a dedicated team of 16 employees, operates from its head office in Melbourne, with additional sites in Sydney and Perth. As the established market leader in fibre optic technology and communications cabling, MSS Data Solutions delivers comprehensive, end-to-end solutions that address the diverse needs of projects across the enterprise, industrial, and telecommunications sectors in Australia and New Zealand. With over 20 years of industry expertise, MSS Data Solutions is known for providing faster, more efficient service, supporting clients at every stage of their communications infrastructure projects.

What sets MSS Data Solutions apart is its commitment to partnering closely with clients to deliver complete, tailored data and communications solutions. Through a combination of world-class products, expert in-house support teams, and strong international partnerships, MSS Data Solutions ensures that clients receive the most advanced and reliable technology available. The company's solutions encompass everything from fibre optic cabling systems to advanced connectivity components, each engineered to optimise network performance and durability.

MSS Data Solutions' position as an industry leader is reinforced by its focus on innovation and adaptability. The company continuously invests in the latest technologies and best practices, enabling it to meet the evolving demands of high-speed data transfer and network reliability. By leveraging its extensive experience and cutting-edge technology, MSS Data Solutions is uniquely equipped to provide end-to-end communications solutions that empower businesses across Australia and New Zealand to build and maintain resilient, future-ready networks.

### **SUPPLY CHAIN SUMMARY**

During the reporting period MSS Data Solutions had a total spend of approximately \$7.4M spread across 55 suppliers from 9 countries including Australia, Canada, Hong Kong, and Italy. The main products supplied were telecommunications infrastructure, hardware and software. Its supplier arrangements were mainly stable and based on long-term relationships.

# Our Operations and Supply Chain



## Hendon Semiconductors

Specialised Engineering and manufacturing PCB services since 1962.

### DESCRIPTION OF OPERATIONS

Hendon Semiconductors, with a dedicated team of 34 employees, operates from its head office and manufacturing facility in Adelaide, South Australia. With roots tracing back to its time as part of Philips Semiconductors, Hendon Semiconductors has a rich history in integrated circuit design and wafer fabrication, positioning it as one of Australia's premier electronic design and manufacturing companies. Established under its current name in 2007, Hendon Semiconductors has built a strong reputation for technical expertise, precision manufacturing, and innovation in electronics.

The company specialises in a range of advanced services, including custom-integrated circuit (IC) design, where its team develops tailored IC solutions to meet specific customer needs. Hendon Semiconductors is also recognised for its applications design expertise, which spans critical functions such as energy management, mains switching, temperature control, lighting control, and switch mode power supplies. This capability allows Hendon to support industries requiring highly reliable, performance-optimised electronic systems.

Hendon Semiconductors is further distinguished by its work in thick film hybrid design and manufacturing, providing robust solutions for industries where durability and efficiency are paramount. With a focus on precision Surface Mount Technology (SMT) manufacturing, the company is equipped to produce high-quality PCBs (printed circuit boards) and modules. Its proprietary testing methods ensure that every product meets stringent standards, backed by comprehensive quality control measures, life testing, and Failure Mode and Effects Analysis (FMEA) processes to uphold reliability and performance.

This combination of design innovation, technical manufacturing capability, and rigorous quality assurance makes Hendon Semiconductors a trusted partner for clients across various sectors, delivering Australian-made electronic solutions that meet global standards. Hendon's expertise and long-standing industry presence allow it to address complex electronic requirements with a level of detail and precision that sets it apart in the Australian and international markets.

### SUPPLY CHAIN SUMMARY

During the reporting period Hendon Semiconductors had a \$3.7M spread across 93 suppliers across 9 countries. These suppliers are in Singapore, the People's Republic of China, Hong Kong, the USA, and Australia. The main products supplied were electronic components. Its supplier arrangements were mainly stable and based on long-term relationships.

# Our Operations and Supply Chain



## Acculec Power

Smart technology solutions for the power industry.

### DESCRIPTION OF OPERATIONS

Acculec Power, formed from the respected businesses previously known as Acculec and Legend Power, officially entered the market on 1st July 2022. By uniting the strengths of these two established companies, Acculec Power now offers a comprehensive range of Medium and High Voltage electrical connectivity solutions, addressing the varied needs of overhead and underground power transmission and distribution clients across Australia, New Zealand, and the broader Asia-Pacific region.

With a skilled team of 18 employees, Acculec Power operates from offices and facilities in Sydney, Perth, Brisbane, and Auckland. As a leading supplier, Acculec Power specialises in the manufacture and distribution of high-quality branded products, consumables, and essential services to key industries such as mining, resources, construction, infrastructure, rail, electrical power utilities, and manufacturing. The company serves an extensive customer base, including tier-one principals in the utility, resources, construction, and infrastructure sectors, showcasing its capability to meet the demanding requirements of these industries.

Acculec Power has built a reputation grounded in excellence, establishing long-term partnerships with clients who rely on its high standards for quality, dependable service, and customer support. This level of trust and loyalty is a testament to Acculec Power's unwavering commitment to maintaining impeccable service standards and delivering reliable, high-performance products.

Following its establishment, Acculec Power conducted a thorough review of Australian service suppliers within its operations, confirming alignment with its rigorous standards and uncovering no adverse findings. This proactive approach ensures that every aspect of its supply chain upholds Acculec Power's dedication to quality, further reinforcing its position as a trusted partner in the electrical power solutions industry across the region.

### SUPPLY CHAIN SUMMARY

During the reporting period Acculec Power had a total spend of approximately \$20.7M spread over 209 suppliers across 12 countries, principally from the USA, the People's Republic of China, and Australia. The main products supplied were finished goods or partially finished goods including Surge Arresters, Insulators, Line Hardware, Voltage Regulator, Anchors, Earth rods and couplers. Its supplier arrangements were mainly stable and based on long-term relationships. Australian suppliers to Acculec Power's operations were reviewed soon after acquisition for modern slavery risk and there were no adverse findings.

# Policy Framework

Legend has implemented comprehensive policies and processes to reduce the risk of contributing to modern slavery within its operations and supply chains. Through these policies and processes, Legend aims to promote ethical practices, protect human rights, and ensure compliance with modern slavery legislation. These include:

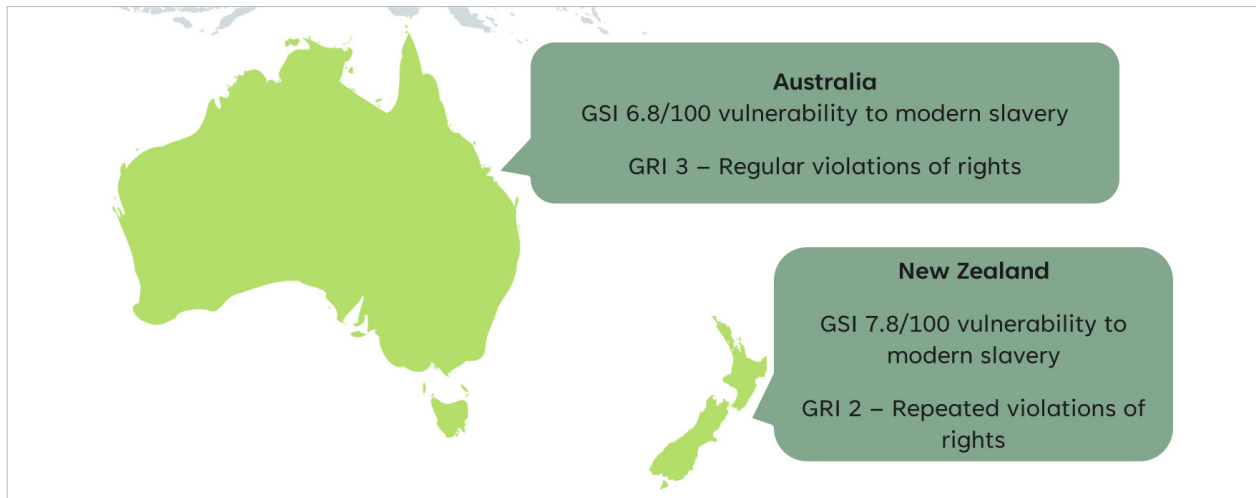
<b>Whistle Blower Policy</b>	Legend's whistleblower policy enables employees and outside parties to report grievances directly to Legend or through an independent third party. All employees received comprehensive training upon employment on this policy to ensure everyone understands how to report concerns securely and confidentially. This policy was reviewed and updated in FY 2021.
<b>Recruiting Policies</b>	Legend has a set of recruitment policies and practices that comply with relevant federal and state regulations including minimum working age and minimum wage requirements. This policy was reviewed and updated in FY 2021.
<b>Legend Code of Conduct</b>	The Legend Code of Conduct details the company's values and behavioural expectations for team members, including high standards of integrity and ethical conduct. This policy was reviewed in FY 2023.
<b>Remediation Process</b>	Legend collaborates with suppliers to address breaches of its Modern Slavery policies through remediation and monitoring plans. Ending the relationship is considered only if the supplier does not demonstrate improvement or commitment to ending the practices. This policy was introduced in FY 2022.
<b>Responsible Procurement Policy</b>	This policy sets out key considerations when making purchasing decisions and supplier engagement, in line with Legend's ethical approach to sourcing. It describes our commitment to ensuring that our procurement practices respect human rights, support positive impacts on the environment and the communities where we work. This policy was introduced in FY 2023.
<b>Supplier Code of Conduct</b>	Legend engages with suppliers who treat their workers with dignity and respect, adhere to applicable laws and regulations. The supplier code of conduct sets out the key requirements and responsibilities shared between Legend and our suppliers for meeting high ethical standards. It also covers the consequences of a breach in the Code of Conduct. This policy was introduced in FY 2023.
<b>Modern Slavery Policy</b>	Legend's Modern Slavery Policy commits to preventing modern slavery and human trafficking in its operations and supply chains. It includes measures for risk assessment, supplier standards, employee training, and reporting processes to ensure ethical practices and protect human rights across the business. This policy was recommended in the independent third-party gap analysis and was introduced in the current report period July 1, 2023, to June 30, 2024.



# Modern Slavery Risk Assessment

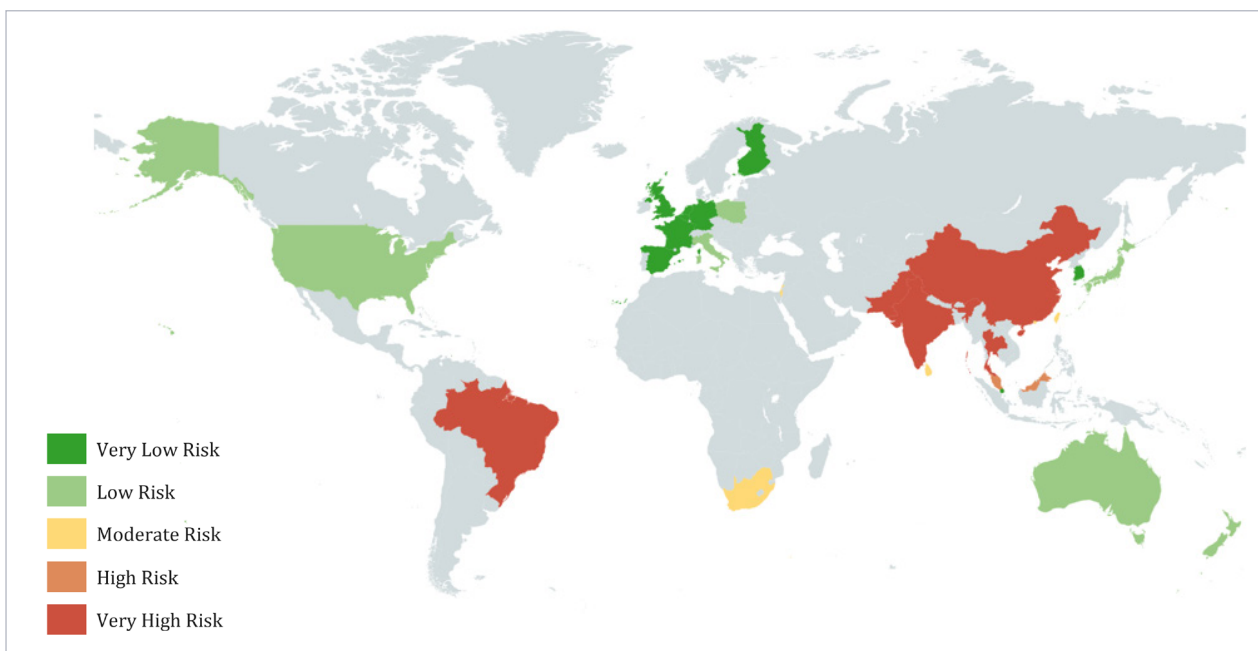
In the FY23 period, Legend engaged an external third-party consultant to conduct a Modern Slavery Risk Assessment to provide a snapshot of Legend's risks of modern slavery. This assessment remains relevant as it reflects current supply chain dynamics; the sources of supply have not changed since the assessment, ensuring that the findings still accurately represent Legend's exposure to modern slavery risks. Consequently, the insights continue to guide Legend's compliance and ethical sourcing practices, allowing for effective risk management aligned with existing supply chain realities. The key findings in the Risk Assessment were higher through the supply chain than through its own operations. See Figure A.

**Figure A.** Operations Modern Slavery risk by Country



**Country-Specific Risks:** Certain supplier countries, such as China, Pakistan, India, Brazil, and Thailand, have very high risks associated with modern slavery. Suppliers with registered Australian ABNs may still pose risks if they source products from these high-risk regions. See Figure B.

**Figure B.** International Suppliers and Modern Slavery risk by region based on the Global Slavery Index (GSI), Global Rights Index (GRI) and US Departments of Labor and State reports

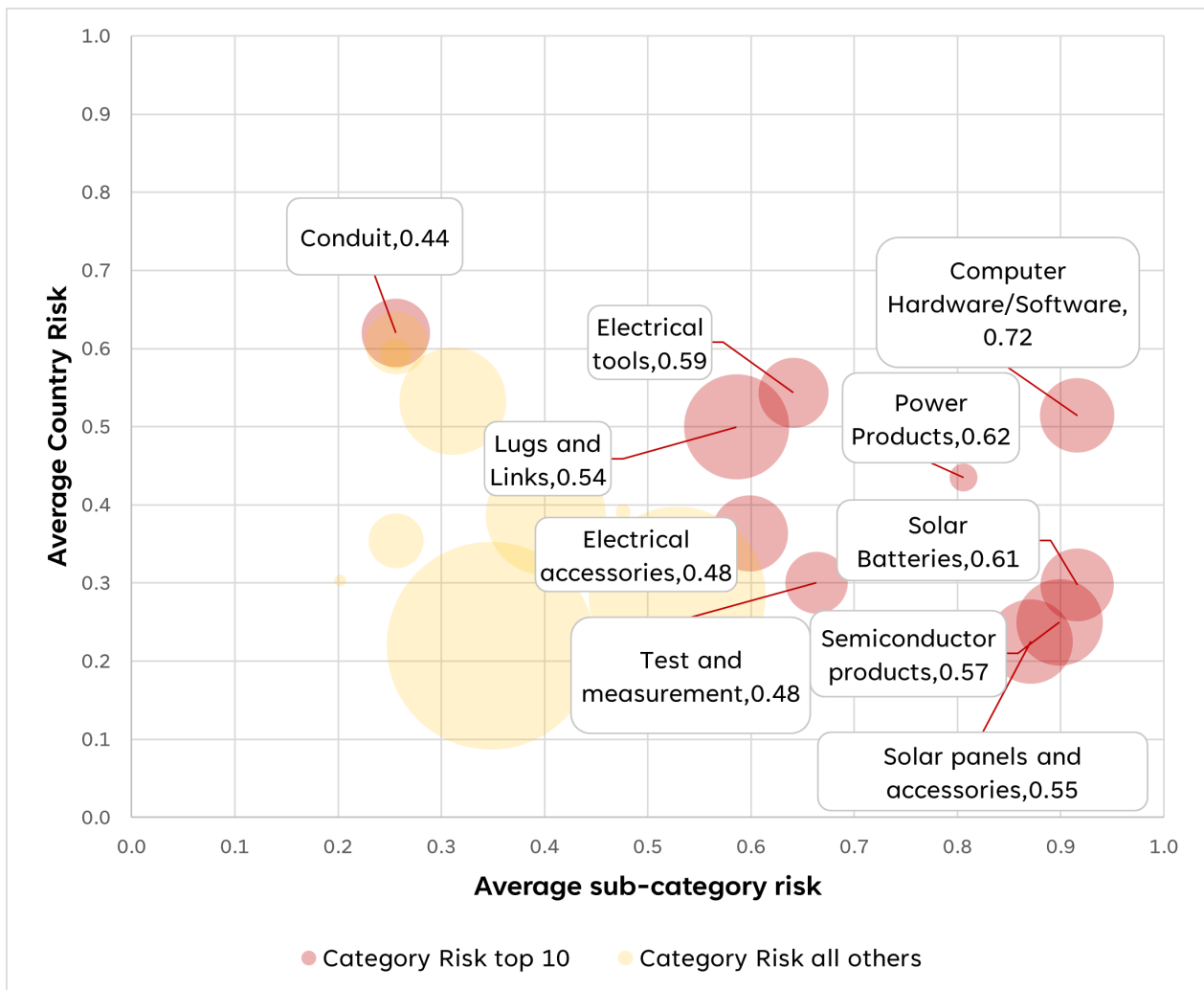


# Modern Slavery Risk Assessment (cont.)

High-risk commodities in the electrical industry supply chains can include protective equipment, solar PV components, finished electronics, semiconductors, copper, and steel. These commodities are often associated with labour-intensive production processes and complex global supply chains, which can create environments where modern slavery risks are heightened. For instance, the extraction of raw materials like copper and steel, as well as the manufacturing of electronics and semiconductors, frequently involve regions where forced labour, child labour, and inadequate labour rights protections are well-documented concerns. Consequently, these commodities require close monitoring and due diligence to mitigate the potential for exploitation and ensure ethical sourcing practices throughout Legend's operations.

**High-Risk Commodities:** High-risk commodities in Legend's supply chain include protective equipment, solar PV components, finished electronics, semiconductors, copper, steel, and specific conflict minerals. See Figure C. Given the high-risk nature of these commodities, additional rigorous monitoring, audits, and supplier assessments to ensure compliance with anti-slavery regulations and standards have been implemented.

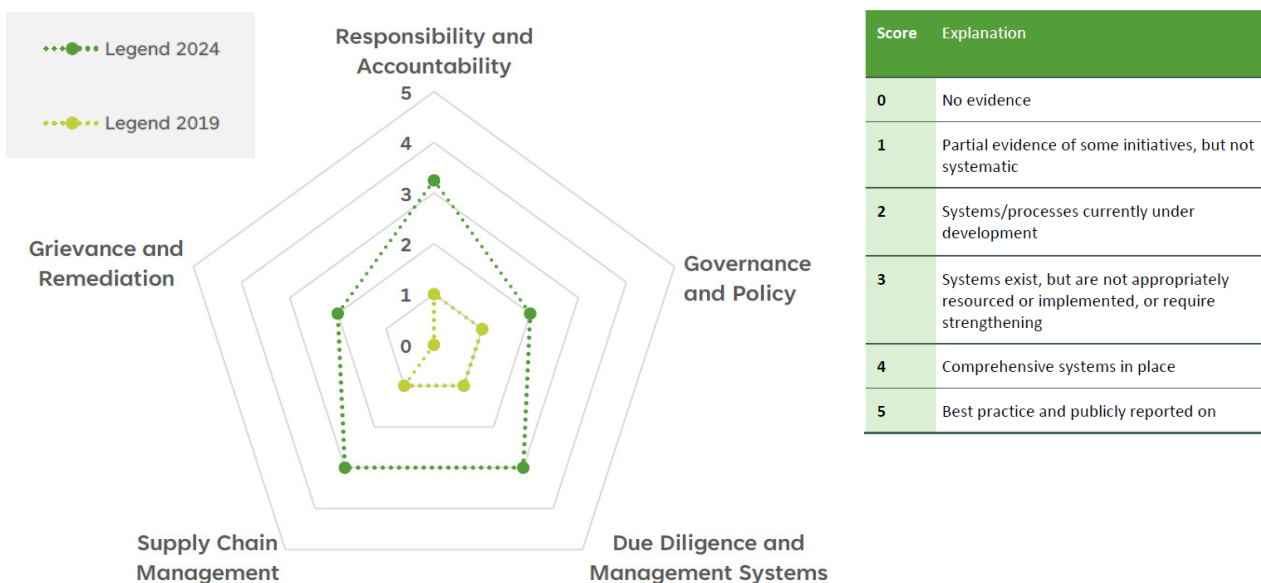
**Figure C.** Product Categories and Modern Slavery risk by product category and region.



# Gap Analysis

In FY24, Legend engaged an independent third-party consultant to conduct a Modern Slavery Gap Analysis, aimed at assessing Legend's current approach to managing modern slavery risks within its operations and supply chain. This analysis was benchmarked against a similar gap analysis conducted in 2019, providing a comparative view to identify shifts in Legend's risk profile and to measure year-on-year improvements in the maturity and effectiveness of its modern slavery management practices. The findings helped gauge Legend's progress and provided insights into enhancing its strategies to prevent modern slavery.

**Figure D.** Year-on-year Gap Analysis Results measures Legend's performance against the 5 criteria of modern slavery management systems, which correspond to the requirements of the Act.



The 2024 Modern Slavery Gap Analysis for Legend Corporation highlighted several advancements already made as well as areas for improvement. These findings offer a roadmap for Legend to further align with modern slavery regulations and industry best practices.

## Advancements

**Enhanced Due Diligence and Risk Assessment:** Conducted a comprehensive supply chain risk assessment in 2023, improving visibility into high-risk suppliers and categories.

**Supplier Code of Conduct and Policies:** Developed a Supplier Code of Conduct and a Responsible Procurement Policy, setting clearer expectations for suppliers regarding ethical practices.

**Increased Site Visits and Audits:** Began performing site visits for top-tier suppliers, and collecting data via Self-Assessment Questionnaires (SAQs) to monitor modern slavery risks.

## Areas for improvement

**Governance:** Establish a modern slavery working group reporting to the board.

**Risk Management:** A comprehensive remediation process is needed. This includes establishing clear protocols for addressing and rectifying identified issues, setting up escalation pathways, and defining structured support for suppliers to remediate risks effectively.

**Policies:** Implement a standalone Modern Slavery Policy.

**Due Diligence:** Strengthen supplier audits and implement third-party audit systems.

**Grievance Mechanisms:** Increase accessibility, engage affected workers, and develop remediation frameworks

# How We Address the Effectiveness of Our Actions

An effective response to modern slavery, actively reduces vulnerability to exploitation by fostering positive changes in behavior and practices throughout our business and supply chain. Ensuring our actions are impactful in managing modern slavery risks is essential. Since publishing our first standalone modern slavery statement in 2021, we've gained valuable insights into strengthening our approach. While we recognise that there is always room for growth, we are committed to ongoing monitoring and continual improvement to enhance the effectiveness of our efforts.

To evaluate our progress in combating modern slavery, we utilise a range of key indicators. These indicators enable us to regularly assess and fine-tune our approach, ensuring that our actions lead to sustained, positive changes throughout our operations and supply chain.

**Table 1. Key Indicators**

Elements	Assessment	Status
<b>Policy framework</b>	Policy Review and Implementation: Conduct regular reviews of all policies related to modern slavery and human rights violations to ensure they are current, aligned with best practices, and effectively implemented across the organisation.	A specific Modern Slavery Policy was introduced to encompass modern slavery and adherence to the core ILO conventions within the code of conduct.
<b>Reporting</b>	Incident Reporting: Track any reports of modern slavery or human rights violations received via the whistleblower program, other channels from suppliers such as the audit program, internal, or external stakeholders. The absence of reports may reflect policy adherence or a need to increase report awareness.	There have been no reports of modern slavery or any other human rights violation via the whistle blower program or any other sources from suppliers, internal stakeholders, or external stakeholders.
<b>Risk Assessment</b>	Supplier Audits and Risk Questionnaires: Monitor modern slavery risk by utilising supplier questionnaires and conducting regular third-party risk assessments to identify high-risk areas within the supply chain.	Supplier questionnaires and third-party assessments have identified high-risk areas within our supply chain, allowing us to prioritise targeted audits and focused mitigation strategies.
<b>Risk Mitigation</b>	Responsible Procurement Practices: Follow the Responsible Procurement policy to mitigate risks, supported by the third-party gap analysis to identify areas for improvement and align practices with industry standards	By adhering to the Responsible Procurement policy and conducting third-party risk assessment and gap analysis, we have identified key areas for improvement and aligned our practices more closely with industry standards. This process has strengthened our risk mitigation efforts and reinforced our commitment to ethical sourcing across the supply chain.
<b>Communication</b>	Training Program Participation and Retention: Track the completion and retention rates of modern slavery and human rights training among employees, with refresher courses as needed to strengthen awareness and capability.	Monitoring training completion and retention rates has shown high levels of participation and understanding among employees in modern slavery and human rights topics.



# Current and Future Action Plan

In the prior Modern Slavery Statement, Legend identified a series of planned actions aimed at strengthening its commitment to addressing modern slavery risks across its operations and supply chain. These actions were successfully implemented during the FY24 reporting period.

Action	Completion
Creating a more targeted risk-based due diligence program for more prevalent risk commodities or regions.	Based on insights from the FY23 risk assessment, Legend implemented a risk-based due diligence program targeting high-risk commodities and regions.
Implement improved processes and actions based on the results from the FY23 third-party risk assessment	Legend implemented targeted improvements based on the FY23 third-party risk assessment, including strengthened monitoring protocols, updated supplier audit processes, and refined risk management practices for high-risk suppliers.
Engage with an external consultant to conduct an updated gap analysis.	Legend engaged an external consultant to conduct the gap analysis in the FY24 period.
Expanding on the supplier auditing program by conducting on-site factory and worker audits.	On-site factory and worker audits have commenced allowing for direct assessment of working conditions and compliance with modern slavery standards at high-risk locations.

In the next reporting period, Legend plans to implement the FY23 risk assessment and FY24 gap analysis recommendations. These actions aim to strengthen transparency, accountability, and protection against modern slavery in our supply chain. Outlined below are Legend's current, ongoing, and planned action initiatives.

**Risk Management and Mitigation:** Continue to conduct audits for key suppliers, focusing on high-risk commodities (e.g. conflict minerals, solar PV) sourced from vulnerable regions. Introducing a Risk-Management Framework to provide the structure, process, and tools that will provide a consistent approach to managing risk.

**Grievance and Whistleblower Program:** Increase awareness of the whistleblower program, both internally and with suppliers, through training sessions and clear communication of rights and protections for whistleblowers.

**Remediation Process:** Expand on the remediation process by establishing corrective action plans with clear steps, timelines, and requirements for compliance. Provide resources and support to suppliers for remediation efforts, prioritising improvement plans over disengagement wherever possible. This can include training, compliance tools, or access to third-party advisory services.

**Enhance Stakeholder Engagement and Transparency:** Conduct refresher training for employees, focusing on those in procurement, to strengthen their ability to identify and address modern slavery risks.

**Internal Policies and Processes:** Continuously monitor global trends and internal findings to adjust policies, audit requirements, and supplier expectations in response to evolving risks.

# Appendix

## Compliance with the Modern Slavery Act Requirement

The below table identifies where information related to each mandatory reporting criteria set out in the Australian Modern Slavery Act can be located within the report.

Mandatory Criteria for Modern Slavery Statements	Section of Information	Page Number
Identify the reporting entity	About Us	4
Describe the structure, operations and supply chains of the reporting entity	Our Structure, and Our Operations and Supply Chain	5 - 10
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Modern Slavery Risk Assessment	13, 14
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Policy Framework, Gap Analysis, and Current and Future Action Plan	12, 15, 17
Describe how the reporting entity assesses the effectiveness of such actions	How we address the effectiveness of our actions	16
Describe the process of consultation with any entities that the reporting entity owns or controls	Statement from Bryan Tisher, CEO and Andrew Bullock, Chairman	2
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Executive Summary	3

*“Legend Corporation,  
where technology &  
environment work  
in harmony for  
a sustainable  
future”*





**LEGEND**

THE POWER TO TRANSFORM

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