

Modern Slavery Statement

Year ending 29 February 2024



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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, 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 Logicalis International, a global company operating in 21 countries, employing more than 4,000 staff with global revenues of USD\$1.25bn for the year ending 29 February 2024.

Logicalis International ("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, insurance companies, and Founder, CEO, and Director Mr Montanana which are among the 5,285 shareholders spread across the world.

Datatec's operating divisions includes Logicalis International, Logicalis LATAM, Westcon International, and Mason Advisory. In addition, Datatec's Corporate function provides business support and consulting services to the respective divisional management functions. The Logicalis International 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 29 February 2024 and through the year to date commencing 1 March 2024 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 335 employees and contractors located in Australia and Malaysia.

Logicalis Australia earns annual revenues of approximately \$114m AUD. More than 99% of its Gross Revenue is generated through business transactions in Australia.

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 (10% of suppliers and 2% of the 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, Conflict of Interest, Trade Sanctions, and Supplier Onboarding Policies. This includes completion of the Logicalis Australia Modern Slavery in Supply Chains Survey which includes 9 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.

A selection of existing suppliers are surveyed, 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 questionnaire.

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 29 February 2024 and the requisite responses were received from suppliers representing 60% of Logicalis' supplier spend (which excludes labour and related on-costs). Where responses were not received, 2 further follow-up requests were completed to ensure requisite responses were received, before being escalated to management to ensure a response was received. For the year ending 29 February 2024, all responses were received, except 1, with no risks identified by Logicalis in relation to the responses received. Logicalis continues to work to close out the last response.

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.

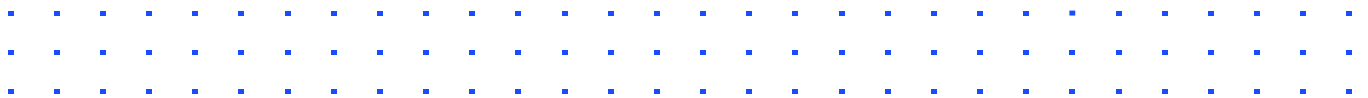
Logicalis is strongly of the opinion that its processes are effective and robust in addressing the issues of modern slavery with regard to its incumbent and prospective stakeholders, and ensures the processes followed are adhered to without exception, with regular reviews and guardrails in place to ensure compliance per the policies are applied. The robust nature of the approach in which Logicalis applies to Modern Slavery includes training (including regular mandatory updates to training), communication and enforcement of key policies, regular structured reviews of incumbent and prospective stakeholders, regular meetings of the Modern Slavery Committee to address processes and risks, as well as a separate review as part of the regular risk review process (conducted by the Logicalis Australia Risk Officer) form a multi-faceted and comprehensive approach to review of Modern Slavery risks.

The Logicalis Australia Modern Slavery Committee represents all entities within the Logicalis Australia Group. The policies applied, including Modern Slavery reviews and onboarding processes, training regimen and communications regarding Modern Slavery are communicated and equally applied to all entities within the Logicalis Australia group, and all stakeholders within these entities.

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 27 August 2024. 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 Co-Company Secretary via email: david.bentley@au.logicalis.com.



Logicalis Group Policy

Logicalis Group Limited, domiciled in the United Kingdom and the parent entity 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") ([RBACodeofConduct8.0 English.pdf \(responsiblebusiness.org\)](#)).

The UN Principles include obligations relating to the rights of individuals to freely choose 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, gender identity or expression, 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. We expect our suppliers to cascade these standards down their own supply chains. The Logicalis Code of Conduct includes whistleblowing procedures for reporting potential breaches, including modern slavery concerns.

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 Logicalis and Datatec ARCCs (Audit, Risk and Compliance Committee) along with the remedial actions undertaken.

In addition, the Logicalis Group Social and Ethics Committee, continues to monitor the activities of the Group 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, we integrate modern slavery considerations into our supplier onboarding process and all affiliates are required to ensure that supplier contracts with new suppliers comply with our Code of Conduct. Furthermore, our affiliates are instructed to consider compliance with international laws, including those related to modern slavery, when evaluating potential suppliers.

Risk and compliance

The Group proactively evaluates 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 that have adopted their own anti-slavery policies and procedures.

Remediation and transparency

We take all reported breaches of our Code of Conduct seriously. Depending on the severity, corrective actions may include corrective action plans, additional training for suppliers, or termination of the business relationship. We are committed to transparency and will report on our performance in future statements.

Training

All Logicalis employees are required to complete an interactive online training course annually on 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.

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. We are committed to continuous improvement in our efforts to eradicate modern slavery from our supply chains. We will regularly review and update our policies, procedures, and risk assessment methodologies to ensure their effectiveness.

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 2023 and ending 29th February 2024. The statement also relates to its following subsidiaries:

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



Leopoldo Dal Bianco
Company Secretary
Logicalis Group Limited

Date: April 2024

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