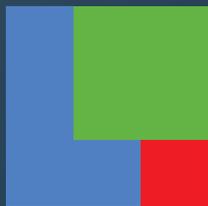


Legend Corporate Modern Slavery Statement FY22

DECEMBER 2022



LEGEND

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

Statement from Bryan Tisher, CEO and Andrew Bullock, Chairman

This Statement sets out the progress achieved by Legend Corporation Pty Limited during the 2022 reporting period in addressing the risks of Modern Slavery in our operations and supply chain.

Modern Slavery is a global problem. We are focused as a company to ethically source and protect human rights in the procurement of goods and services on behalf of our customers.

We understand our role in the supply chain of other organisations, which is why our sustainable development goals include the UN Sustainable Development Goal 8 'Decent Work and Economic Growth' and its target 8.7 'End Modern Slavery, Trafficking and Child Labour'.

We have put forward measurable goals to assess our progress in reducing the risk of Modern Slavery in our supply chain and conduct regular risk assessments to ensure we are capturing any gaps in our processes.

We understand that Modern Slavery is a complex and ongoing challenge, and we are committed to continuing to address these issues and work together with our suppliers to educate and eliminate Modern Slavery in our operations and supply chain.

This Statement has been approved by the Chief Executive Officer and the Board of Directors of Legend Corporation Pty Limited.



A handwritten signature in black ink that reads "Bryan Tisher". The signature is written in a cursive style and is positioned above a horizontal line.

Bryan Tisher, Legend Chief Executive Officer

A handwritten signature in black ink that reads "Andrew Bullock". The signature is written in a cursive style and is positioned above a horizontal line.

Andrew Bullock, Legend Chairman of the Board

19th December 2022

Executive Summary

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) ('Modern Slavery Act'). It describes the risks of Modern Slavery in Legend's operations and supply chains, as well as actions taken in minimising these risks in the period from 1st July 2021 to 30th June 2022.

This report includes:

- An overview of the Legend Corporation business, including our structure, our seven sales business units, operations, and supply Chains;
- Our current policies and procedures;
- Our goals and objectives in tackling Modern Slavery, and our approach to Ethical Sourcing;
- Risks in our operations and supply chain;
- Our progress to date and measuring the success rate of our prior commitments; and
- Actions and plans going forward.

Over the past twelve months we have continued to make progress on reducing Modern Slavery risks within our supply chain and operations, which this statement will highlight those initiatives which we have implemented into our daily business activities.

Our supplier auditing program has reached out to 90% of our supplier base based on annual spend, and in this process, we have determined that our suppliers are at low risk of Modern Slavery practices.

We are also planning for future initiatives to continue to drive progress in this space. We are currently working on a Responsible Procurement Policy and updating our current Purchasing

Terms and Conditions which will incorporate a Supplier Code of Conduct. We are also ensuring that our suppliers and staff are trained in understanding risks in the supply chain and the issues of Modern Slavery, and to identify solutions. This is a continued process and is conducted on an annual basis.

Legend is committed in ensuring we only trade with suppliers who we understand do not conduct any forms of Modern Slavery or human rights abuses.

Our risk management processes help to prevent suppliers entering our business who are or may show signs of Modern Slavery. We also have a remediation process in place if we were to discover any forms of Modern Slavery or human rights abuses with any of our existing suppliers.

We have certainly felt challenges in this reporting period with the impacts of COVID-19 that were felt globally. Our global supply chains were challenged with sources of supply, highlighting the importance of managing Modern Slavery supply chain risks.

Therefore we plan to engage in the financial year 2023 an external consultant to conduct an updated risk assessment. The risk assessment will review suppliers based on risk commodities and countries. It will also review product risk ratings against global sources such as the UN Global Human Development Indicators, the ITUC Global Rights Index, the UNICEF Child Labour Dataset and the Global Slavery Index.

We will propose to also engage with this consultant to conduct a gap analysis which will identify actions to improve performance and processes moving forward.

We are committed to the identification of Modern Slavery in our supply chain and taking action to eliminate it.

Bryan Tisher, Legend Chief Executive Officer

About Us

Legend Corporation Pty Ltd (ACN: 102631087, ABN: 69 102631087) ("Legend") is an electrical products and industrial solutions supplier.

It is a market leading designer, manufacturer and distributor of products and accessories to the electrical utility, data communications and industrial gas markets.

The company also engineers, tests, and calibrates and manufactures integrated circuits (micro-chips) and electronic systems for electrical, defence, biomedical and other high-tech industries.

The seven 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 over 281 people 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.



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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.

In the FY23 reporting period the entity Ecco Pacific Limited Co was renamed Legend Corporate Services (NZ) Limited.



The process of consultation

In assessing and addressing the risks of modern slavery practices in the operation and supply chains of the Legend Group and in the preparation of this statement, it was not necessary for Legend to individually consult with each member of the Legend Group.

This is because all the entities in the Legend Group have a common management structure and common management personnel with Legend. For example, the CEO and CFO of Legend are directors of Legend and are also directors of each of the entities in the Legend Group.



* (D) Dormant Entities

Legend owns or controls a number of these 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

Legend owns and trades through 9 entities and operates 7 sales divisions through these 9 entities throughout Australia and New Zealand. The Legend business is identified with Legend Corporation Pty Ltd. (ACN 102 631 087). All of the subsidiary companies described below 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.



CABAC

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

DESCRIPTION OF OPERATIONS

CABAC has 165 employees. Its head office is in Sydney with sites in Melbourne, Brisbane, Adelaide and Perth .

CABAC designs, manufactures, supplies and distributes an extensive range of over 28,000 product lines to the electrical industry which are engineered to industry standards.

CABAC promotes its products via a comprehensive national network of electrical wholesale organisations that service engineering construction, residential, commercial and infrastructure building industries.

Established for more than 25 years, CABAC's products range include the largest range of Australian certified compliant electrical connectors, cable jointing systems, related tools, test and measurement instruments, cable management, structured wiring systems, copper and fibre connectivity, low and medium voltage power connectivity products, and ancillaries.

SUPPLY CHAIN SUMMARY

During the reporting period CABAC had a total spend of \$28M spread over 270 suppliers from 21 countries. The principal countries of supply were the People's Republic of China, India, Taiwan, and Australia. The main products supplied were cabling accessories. Its supplier arrangements were mainly stable and based on long-term relationships.

In 2021 and 2022 Covid-19 affected container availability, freight costs, "snap" port lockdowns particularly in China and industrial disputes.

Our Operations and Supply Chain



System Control Engineering

For over 50 years we have supported the gas and appliance industries.

DESCRIPTION OF OPERATIONS

SCE has 47 employees. Its head office is in Melbourne with sites in Sydney, Brisbane, and Adelaide.

System Control Engineering has been an industry leader for 50 years, servicing the gas, electrical appliance spares, Heating Ventilation, Air Conditioning and Refrigeration industries. SCE also offers a specialized engineering & design service to customers who need a unique gas solution to meet stringent standards compliance and Australian conditions.

Over 15,000 product lines from global brands are available through Electrical & Plumbing wholesalers, supported with online training, sales representatives and marketing material.

Continually investing in new products and innovative technologies ensures that SCE continues to offer the very best quality in products, technical support and service.

SUPPLY CHAIN SUMMARY

During the reporting period SCE had a total spend of \$29M spread across 276 suppliers from a diverse supplier base in Europe, Australia, Asia (including the People's Republic of China, and the USA). The main products supplied were gas and oil parts, appliance spares, valves, HVAC and refrigeration, 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 has a sales Director with the support of the Cabac sales and operations teams. Its head office is in Sydney. Launched November 2020 to provide a dedicated focus to the Consumer & Trade markets.

As our youngest division ECCO PACIFIC specialises in servicing the major “Big box” retailers, specialty tool shops and specialist retailers with access to some of the world’s leading hardware brands.

Ecco Pacific are well placed to offer a wide range of electrical and data products to its customers across the Australian and New Zealand markets.

SUPPLY CHAIN SUMMARY

During the reporting period Ecco Pacific had a total spend of \$500K spread over 9 suppliers from 3 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 has 7 employees. Its head office is in Sydney.

M+H Power is a technology-led company with a long history specialising in the delivery of reliable Off-Grid power solutions for a diverse range of industries and applications.

It also includes the Bardic brand which has delivered quality emergency and exit solutions to the Australian and New Zealand market for over 40 years. Since the introduction of BARDIC, the brand has maintained a strong position in the market, designing and manufacturing various emergency lighting products from the early fluorescent lighting battens to today's LED Light Saver with lithium battery technology.

SUPPLY CHAIN SUMMARY

During the reporting period M+H Power had a total spend of \$8.8M spread across 57 suppliers from 14 countries. The principal countries of supply were the People's Republic of China, Australia, USA, Spain, Germany, Canada, and Finland. The main products supplied were batteries, solar products, and emergency lighting. Its supplier arrangements were mainly stable and based on long-term relationships.

Covid-19 affected its supply chain through container availability, freight costs, "snap" lockdowns at ports (particularly China) and industrial disputes.

Our Operations and Supply Chain



MSS Data Solutions We make unique solutions happen.

DESCRIPTION OF OPERATIONS

MSS Data Solutions has 11 employees. Its head office is in Melbourne with further sites in Sydney and Perth.

MSS Data Solutions is the established market leader in fibre optic and innovation for communications cabling, providing end-to-end solutions for the needs of any project. With 20 years of experience, we guarantee a faster, more efficient service for the enterprise, industrial and telecommunications industries across Australia and New Zealand.

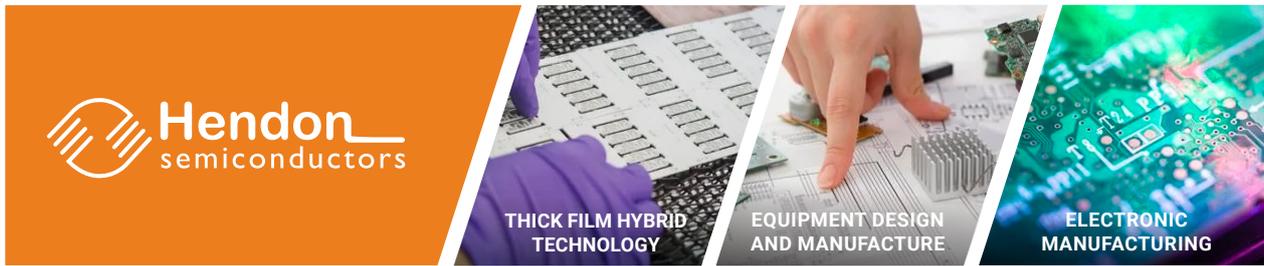
MSS Data Solutions is uniquely positioned to work with our clients to deliver complete data and communications solutions through our world class products, in-house support teams and international partnerships.

SUPPLY CHAIN SUMMARY

During the reporting period MSS Data Solutions had a total spend of approximately \$12M spread across 44 suppliers from Australia, Canada, Peoples Republic of China, and South Korea. The main products supplied were telecommunications infrastructure hardware and software. Its supplier arrangements were mainly stable and based on long-term relationships.

Covid-19 affected its supply chain through container availability, freight costs, “snap” lockdowns at ports (particularly China) and industrial disputes.

Our Operations and Supply Chain



Hendon Semiconductors

Specialised Engineering and manufacturing PCB services since 1962.

DESCRIPTION OF OPERATIONS

Hendon Semiconductor has 30 employees. Its head office and manufacturing operation is in Adelaide. It has been a long-established integrated circuit design and wafer fabrication facility in Australia, from its Philips semiconductor background up to 1997, when the business became Integrated Electronic Solutions Pty. Ltd, to its name change to Hendon Semiconductors Pty. Ltd in 2007.

Hendon Semiconductors is a specialist electronic design and manufacturing company with expertise in:

- Custom integrated circuit design
- Applications design including energy management, mains switching, temperature control, lighting control and switch mode power supplies
- Thick film hybrid design and manufacture
- Precision SMT manufacturing
- SMA of PCBs and modules
- Proprietary testing of all products
- Extensive quality control, life test, FMEA process

SUPPLY CHAIN SUMMARY

During the reporting period Hendon Semiconductors had a \$5.2M spread across 120 suppliers. These suppliers are in Singapore, the People's Republic of China, Malaysia, the USA and Australia. The main products supplied were electronic components. Its supplier arrangements were mainly stable and based on long-term relationships. Covid-19 affected its supply chain due to a 1-month shutdown of an operational facility in Asia.

Our Operations and Supply Chain



Acculec Power

Smart technology solutions for the power industry.

DESCRIPTION OF OPERATIONS

Acculec Power is comprised of the businesses previously known as Acculec and Legend Power. Acculec Power was launched into the market on the 1st July 2022.

The combined strength of two well respected power companies allows the division to supply a wide range of Medium & High Voltage electrical connectivity design solutions to meet the diverse requirements of overhead and underground power transmission and distribution customers across Australian, New Zealand and Asia Pacific markets.

Acculec Power has 17 employees. It has offices and operations in Perth and Brisbane and an office in Auckland. Acculec Power is a leading supplier specialising in the manufacture and distribution of quality branded products, consumables, and services to the mining, resources, construction, infrastructure, rail, electrical power utilities and manufacturing sectors. Our extensive customer base includes tier-one principals in the utility, resources, construction, and infrastructure sectors. Our long-term partnerships are a testament to our impeccable customer service, focus on quality and proven dependability.

Australian service suppliers to Acculec Power's operations were reviewed soon after acquisition and there were no adverse findings noted.

SUPPLY CHAIN SUMMARY

During the reporting period Acculec had a total spend of approximately \$2.3M spread over 22 suppliers principally from the USA, the People's Republic of China and India. 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's operations were reviewed soon after acquisition for modern slavery risk and there were no adverse findings.

Covid-19 affected its supply chain through changes in forecasting, bringing future orders forward, pre-booking sea-freight containers / shipments, changes to shipment out of alternative ports, consolidation of orders for sea-freight shipments and the additional use of airfreight.

The Way We Work

OUR VISION

To build a company that demonstrates repeatable process, clear strategy, sustained profitable growth and employee purpose.

OUR MISSION

Empower customer success by delivering value, innovation and service through superior strategy, people and process.

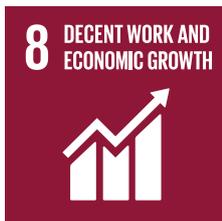
OUR VALUES

Accountability, Teamwork, Integrity, Respect, Excellence.

Sustainable Development Goals

Putting People First

Legend's work in the area of Modern Slavery supports UN Sustainable Development Goal 8 "Decent Work and Economic Growth" and its target 8.7.



Goal 8

Decent Work and Economic Growth

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



Target 8.7

End Modern Slavery, Trafficking and Child Labour

Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Legend's Policies and Procedures

Current policies

Legend has policies and processes that contribute to reducing the risk of Legend contributing to modern slavery in its operations and supply chains. Current policies and processes include:

Whistle Blower Policy	Legend has a whistle blower policy and process that allows reporting of grievances to Legend or a 3rd party. This policy was updated and approved in 2021. There was a comprehensive training program given to all Legend people managers. The Whistleblower policy was also disseminated to all employees.
Recruiting Policies	Legend has a set of recruitment policies and practices that comply with relevant federal and state regulations.
Legend Code of Conduct	Legend employees are required to comply with the Code of Conduct. The Legend Code of Conduct details the company's values and behavioural expectations for team members, including high standards of integrity and ethical conduct.
Remediation Process	For any breaches of Legend's Modern Slavery policies, Legend works with suppliers to develop an appropriate remediation and monitoring plan. Disengaging the relationship with the supplier is not an effective outcome and only used if the supplier does not show improvement or a willingness to eliminate the practices

New policies

During the FY23 reporting period Legend plans on expanding the current policies and procedures to include the below additional and will be included in Legend's FY2023 Action Plan.

Responsible Procurement Policy	This policy sets out key considerations when making purchasing decisions and supplier engagement, in line with Legend's ethical approach to sourcing.
Supplier Code of Conduct	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 will also cover the consequences of a breach in the Code of Conduct.

Modern Slavery Risks in Our Operations

Legend understands there is a risk that its own operations could inadvertently cause, contribute to or be directly linked to modern slavery. As part of its efforts to address Modern Slavery, risk areas have been identified and are described in the table below

Risk	Description	Finding	Our Risk Exposure
1	Casual or Contract workers engaged directly by Legend	Legend's workforce is almost all permanent, with only 4% casual and 2% contractors	Low
2	Casual workers under the age of 18	Legend has no casual employees under the age of 18	Low
3	Migrant workers	Legend has no employees on a temporary visa	Low
4	Seasonal workforce fluctuation	Legend operations are not seasonal, with consistent workforce turnover during the reporting period	Low
5	Freedom of association	Employees of Legend's Hendon Semiconductors division operate under an Enterprise Bargaining Agreement	Low
6	External auditing	Legend is audited to quality, environmental and safety management standards ISO9001, ISO14001 and AS4801 but is not currently audited by a third party for responsible sourcing	Medium
7	Sector Risk	Legend operates in high-risk sectors including: <ul style="list-style-type: none"> • Manufacturing • Wholesale and Trade 	Medium
8	Services engaged by Legend	Legend relies on services including recruitment, legal, cleaning services, construction, property maintenance waste disposal and equipment maintenance. Recruitment, construction, and cleaning services are considered particularly high risk. Legend generally has long term relationships with small family businesses or recognised service providers with strong human rights policies.	Low

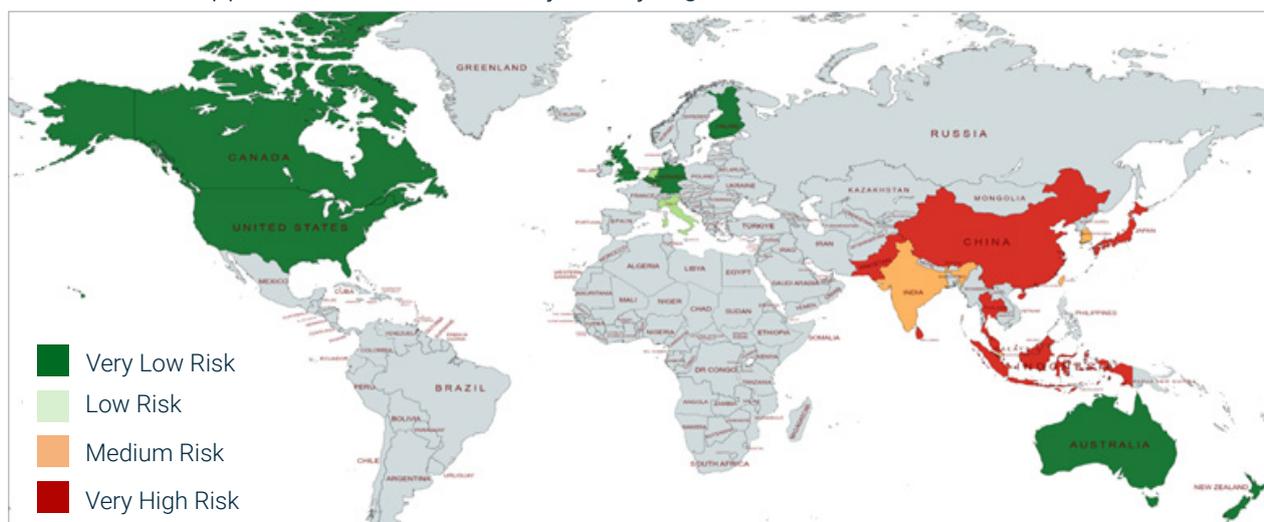
Modern Slavery Risks in Our Supply Chain

A significant risk area for Modern Slavery is supply chains. Legend has a diverse supply chain across its group entities and divisions, with approximately twenty main product suppliers that provide lugs and links, nylon cable ties and glands, conduits, battery crimpers, heatshrink and hand tools. Services procured by Legend include recruitment, legal, cleaning services, construction, property maintenance, waste disposal and equipment maintenance.

Due to location, sector and product/service type, Legend has identified the following modern slavery risks in its supply chain.

Risk	Description	Finding	Our Risk Exposure
1	Legend suppliers located Internationally	Legend has suppliers in India, China, Malaysia. See Figure A below.	Medium
2	Sourcing of raw materials	Legend sources processed material stock including: <ul style="list-style-type: none"> • Electronics • Copper • Tin Plated Copper • Aluminium • Nylon • Protective Equipment Copper is classed as a medium risk commodity. Tin, Tungsten, Tantalum and Gold are classed as high to very high-risk commodities. Legend is linked to these raw materials through its business operations and products.	Medium

Figure A.
International Suppliers and Modern Slavery risk by region



Effects of COVID-19

Due to travel restrictions, we could not conduct any travel to investigate potential modern slavery risks in our supply chain in medium risk countries such as Malaysia or India. Other COVID-19 effects have been included in relevant sections throughout the description of our Sales Divisions.

How We Address the Effectiveness of Our Actions

We are committed to managing effective systems to identify, assess, address, and proactively manage modern slavery risks in our organisation.

To assess the effectiveness of key aspects of our actions, we take into consideration a range of metrics, including:

- The number of supplier risk profiles completed;
- The number of events detected by the Modern Slavery Action Team;
- The risk results identified in the Supplier Audit Questionnaire;
- Stakeholder feedback, including from suppliers, internal stakeholders, and external stakeholders;
- Internal awareness of the companies Modern Slavery risks and obligations.

Below are our action plan items completed in the FY22 period.

Development	Level of Commitment	Assessment
Policies and commitments		
Review update and formalize modern slavery related responsibilities and accountabilities	Compliance	✓
Create 3-year Modern Slavery Action Plan	Beyond Compliance	✓
Create a specific Modern slavery or Human Rights Policy covering own operations or update Code of Conduct to include Human Rights related criteria.	Beyond Compliance	✓
Incorporate Modern Slavery / Human Rights Criteria into audit frameworks across the business	Beyond Compliance	✓
Board		
Conduct Board Level awareness training to increase awareness of Modern Slavery risks and obligations.	Beyond Compliance	✓
Responsibilities: Board		
The Board reviews Modern Slavery Risks regularly during Board Meetings.	Beyond Compliance	✓
Management		
Responsibilities: Management		
Introduce Modern Slavery KPIs for Management Personnel (based on 3-year Modern Slavery Action Plan)	Best Practice	✓
Explore supplier platforms that currently exist (e.g., SEDEX, Amfori, Verite)	Beyond Compliance	✓

Modern Slavery Risk-Specific Actions

In this period Legend will be having a continued focus on the Supplier auditing program and deep diving not only into our supply chain, but that of our suppliers multi-tiered supply chains. We also intend to introduce additional policies such as a Supplier Code of Conduct (SCoC) which sets out the standards and requirements to continue the business relationship with Legend, and the consequences for a breach in the policy.

Below is a summary of the actions in progress or planned for Legend's FY23 period.

Continued Development	Level of Commitment	Time Frame
Due Diligence: Supply Chain		
Follow up remaining suppliers with SAQs to further develop supplier risk profiles	Beyond Compliance	Q3
Supply chain transparency exercises (and asking suppliers about their suppliers)	Best Practice	Q3
Create guideline material for suppliers regarding modern slavery. Incorporate into onboarding process	Beyond Compliance	Q1

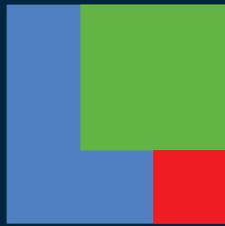
For Development	Level of Commitment	Time Frame
Due Diligence: Supply Chain		
Engage with an external consultant to conduct an updated risk assessment and gap analysis.	Best Practice	Q3
Produce a Responsible Procurement Policy (RP Policy) which governs purchasing decisions, including thresholds, key principles, and considerations when making purchasing decisions.	Best Practice	Q4
Produce a Supplier Code of Conduct (SCoC) – which sets the standards and expectations for suppliers.	Best Practice	Q4

Appendix

Compliance with the Modern Slavery Act Requirement

The below table identifies where information related to each mandatory reporting criteria can be located within the report.

Mandatory Criteria for Modern Slavery Statements	Section of Information
Identify the reporting entity	Executive Summary, and About Us
Describe the structure, operations and supply chains of the reporting entity	Our Structure, and Our Operations and Supply Chain
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 Risks in Our Operations, and Modern Slavery Risks in Our Supply Chain
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	Legend's Policies and Procedures, and Modern Slavery Risk-Specific Actions
Describe how the reporting entity assesses the effectiveness of such actions	How we address the effectiveness of our actions
Describe the process of consultation with any entities that the reporting entity owns or controls	Our Structure
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	The way we work



LEGEND

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Legend Corporation Pty Ltd

ACN 102631087

ABN 69 102631087

Sydney Head Office

8 Distribution Place
Seven Hills NSW 2147

T: (61) 2 9678 5000