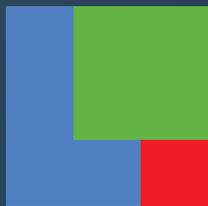


Legend Corporate Modern Slavery Statement FY20

DECEMBER 2020



LEGEND

THE POWER TO TRANSFORM

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

Statement from CEO and Chairman

“Every day, all of us at Legend Corporation work hard on our strategic initiatives to grow our business into something we should all be proud to be associated with.

While what we achieve is important – so is how we achieve it.

How we work is guided by our core values. They are Accountability, Teamwork, Integrity, Respect and Excellence. We are relentless in our pursuit of these values and they guide our decision making.

At Legend Corporation we are all about winning, but we care how we win. We strive for superior results through setting clear goals, defining responsibilities and being accountable for our actions. We are proud to have created a trusting, respectful and inclusive environment, where both personal and team growth, creativity and reinvention flourishes. It strengthens our relationships, builds trust in the communities we participate in and protects our business.

Our code sets a standard of behaviour and keeps us accountable. We may be tested at times, but we will not compromise on our values.

Our code has and will continue to guide us.”

Gary Uren, CEO



Respecting Human Rights

We must respect, and work to, uphold and advance human rights in everything that we do. We acknowledge that our activities have the potential to impact human rights and we manage this through our core business practices.

Preventing and addressing our own involvement in modern slavery is central to our sustainability approach including our commitment to running a safe, responsible and profitable business.

We set clear expectations that our employees and suppliers (including contractors and agents) should be alert to possible involvement in modern slavery and should work to prevent and address it.

We know that adopting high standards is not enough. Knowledge sharing, such as targeted training programmes for employees, and action, including mitigation measures where we see a risk of involvement, are vital to ensure our work stays effective.

A handwritten signature in black ink, appearing to read 'Gary Uren'.

Gary Uren, CEO

A handwritten signature in black ink, appearing to read 'Andrew Bullock'.

Andrew Bullock, Chairman of the Board

Executive Summary

Modern slavery is an insidious issue which permeates commerce around the globe. It is rightly an offence to human dignity and a social evil which must be contained, reversed and eradicated. Up to this point in time it has remained largely hidden from the eyes of the average person in the street and has not made the management agendas of businesses and institutions.

But not anymore.

With the advent of the Commonwealth Modern Slavery Act 2018 here in Australia, the issue is now front and centre and has the close attention of business and the wider community.

“Legend Corporation welcomes the opportunity to take part in the larger movement, now in its early stages, which will see modern slavery’s demise and erasure from history.”

Being in the early stages of this movement, we acknowledge that we have yet to make significant inroads into the identification, confirmation and eradication of its presence in our supply chain. This is our first foray into these uncharted waters.

But with thousands of suppliers across multiple countries, we have developed an action plan to adopt the best risk management tools and practices, powered by the talents of our highly knowledgeable and professional team to move forward on the road to success. This will not be a quick or easy win but we will be persistent and committed in our endeavours.

In 2020 Legend Corporation established a dedicated team to workshop and mobilise the business to address the issue of modern slavery. This group is now under the leadership of the Risk and Compliance Manager who has the full support of the CEO, Gary Uren.

It is comprised of senior and experienced members from Supply Chain, Finance, Operations and Human Resources departments. It continues to have Board level review and access to dedicated professional advice.

We have prepared an action plan to guide us into 2021. This is shown on pages 19-21 of this Statement. This is an ambitious plan which is intended to propel us beyond compliance to the realms of best practice. We intend to position ourselves for a robust, proactive management which will effectively manage modern slavery risk in our supply chain, with the aim of excising it completely.

This year has not been without its challenges and Covid-19 has had a significant impact upon our supply chain and operations. Each of our divisions has felt its effects but we have become more resilient as a result of it. The pandemic’s effects on the supply chain may still be present in the new year but we are well-positioned to handle any vagaries which may eventuate from it.

Legend Corporation will continue to listen and learn from the businesses, organisations and communities which are directly tackling the issue of modern slavery. We will monitor, evaluate and where promising, emulate developments which occur in this field. We will be open to sharing with others our own experience and our challenges if these will help.

We trust that this Statement will be an invitation and a beginning to that pressing dialogue.

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 350 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.



LEGEND

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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 reporting period the entity MH Legend Power was added to the group by acquisition.

Legend Corporation Pty Ltd
ACN 102631087

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 consult with the members 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.

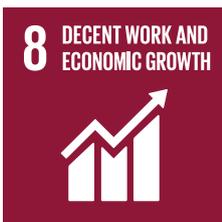


“Achieving a better and more sustainable future for all”

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.

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

Description of Operations

CABAC has 196 employees. Its head office is in Sydney with sites in Melbourne, Brisbane, Adelaide and Perth .

CABAC designs, manufactures and distributes an extensive range of over 28,000 product lines to the electrical industry which are engineered and tested to Australian 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 \$27M spread over 242 suppliers from 22 countries. The principal countries of supply were the People's Republic of China, Thailand, The United Kingdom, The Czech Republic and Taiwan. The main products supplied were cabling accessories. Its supplier arrangements were mainly stable and based on long-term relationships.

In 2020 COVID-19 affected its supply chain through container availability and this is still an ongoing issue.

Our Operations and Supply Chain



SYSTEM CONTROL ENGINEERING

Description of Operations

SCE has 62 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 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 continue 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 \$24M spread over 220 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



LEGEND POWER SYSTEMS

Description of Operations

Legend Power Systems has 7 employees. Its head office is in Sydney with sites in Melbourne, Adelaide, Brisbane and Perth.

Legend Power Systems serves Power Generation; transmission; distribution, Rail and Primary Resource Engineering markets.

Legend Power Systems supplies a wide range of proven power electrical connectivity, special tools, jointing systems and electrical safety products to meet the diverse requirements of overhead and underground power transmission and distribution.

In house NATA laboratories undertake continuous product testing to ensure product compliance with Australian standards.

Supply Chain Summary

During the reporting period Legend Power Systems had a total spend of \$1.3M spread over 71 suppliers from 12 countries. The principal country of supply was Australia. The main products supplied were power system components. Its supplier arrangements were mainly stable and based on long-term relationships. COVID-19 affected its supply chain through disruptions to shipment and container availability.

Our Operations and Supply Chain



M+H POWER SYSTEMS

Description of Operations

M+H Power has 18 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 \$10.8M spread over 59 suppliers from 6 countries. The principal countries of supply were the People's Republic of China, Germany and Italy. 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 disruptions to shipment and container availability.

Our Operations and Supply Chain



MSS DATA SOLUTIONS

Description of Operations

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

MSS Data Solutions is a technology product & services provider that specialises in developing leading edge solutions for the IT, specialist data, audio visual, security, POS, education, corporate computing, telecommunications and broadcast industries.

Supply Chain Summary

During the reporting period MSS Data Solutions had a total spend of approximately \$4M spread over 50 suppliers from Australia, Canada, China, Taiwan and the USA. 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 delays in shipment.

Our Operations and Supply Chain



HENDON SEMICONDUCTORS

Description of Operations

Hendon Semiconductor has 26 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 \$4.3 million spend across its top 10 suppliers. These suppliers are located 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



CELEMETRIX

Description of Operations

Celemetrix has 36 employees. Its head office is in Melbourne with sites in Sydney, Brisbane, Adelaide and Auckland.

Offering an extensive support model to customers throughout Australia and New Zealand for calibration, repair and functional testing services across a range of test & measurement devices, safety equipment and mobile plant used in mission critical applications.

Second tier support includes total asset/ fleet management and compliance & quality audit reporting systems for customer owned equipment ensuring availability and operational integrity and providing product life-cycle services from commissioning through to disposal.

Supply Chain Summary

Celemetrix provide labour services in Australia (NSW, VIC & QLD) and in New Zealand to perform calibration and repairs to test & measurement devices in addition to the functional testing of insulating safety equipment and mobile plant. Its suppliers provide the same services where the technology is out of its scope. In terms of goods supply, its suppliers provide replacement equipment and/or spare parts for repairs. Its suppliers are located in Australia, New Zealand, USA, Singapore, Canada, Germany and the UK. Its supplier arrangements were mainly stable and long-term relationships.

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 2 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

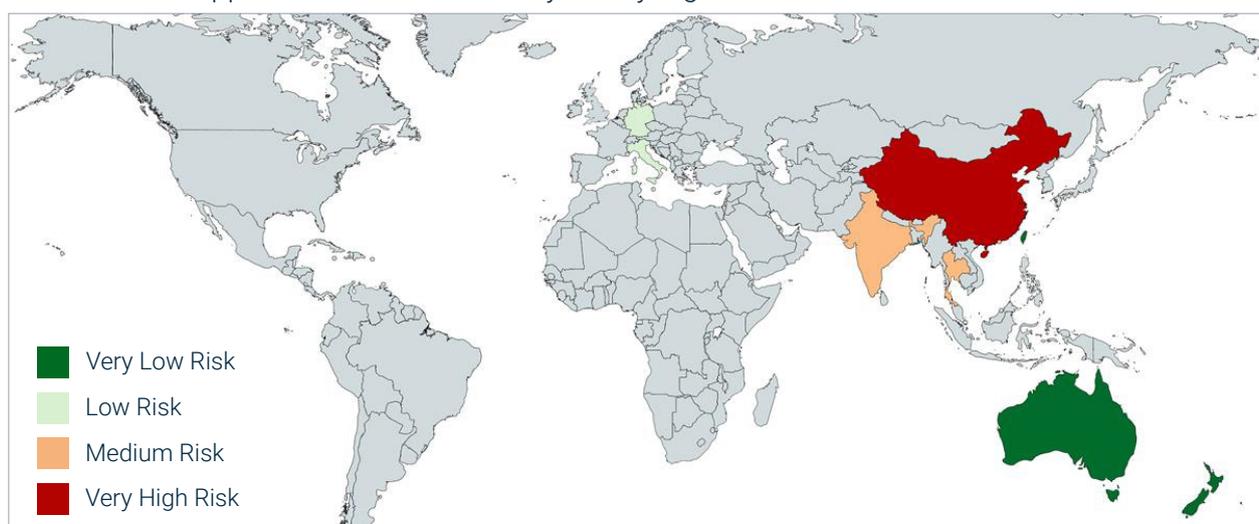
Modern Slavery Risks in Our Supply Chain

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 preliminary overseas travel to investigate potential modern slavery risks in our supply chain. Other COVID-19 effects have been included in relevant sections throughout the description of our Sales Divisions.

“People Focused Processes and Policies”

Actions Taken to Assess and Address Modern Slavery Risks in Reporting Period

Current practices and actions addressing modern slavery

A significant risk area for Modern Slavery is the supply chain. Legend assigned responsibility for modern slavery risk management to the National Quality Manager in February 2020. Following that, a Modern Slavery Risk Assessment and Gap Analysis was conducted to provide Legend with a deep understanding of risk areas in operations and supply chains, and a detailed multi-year action plan.

During the reporting period Legend had in place other policies and processes not specifically aimed at addressing modern slavery risk but that contribute to reducing the risk of Legend contributing to modern slavery in its operations and supply chains.

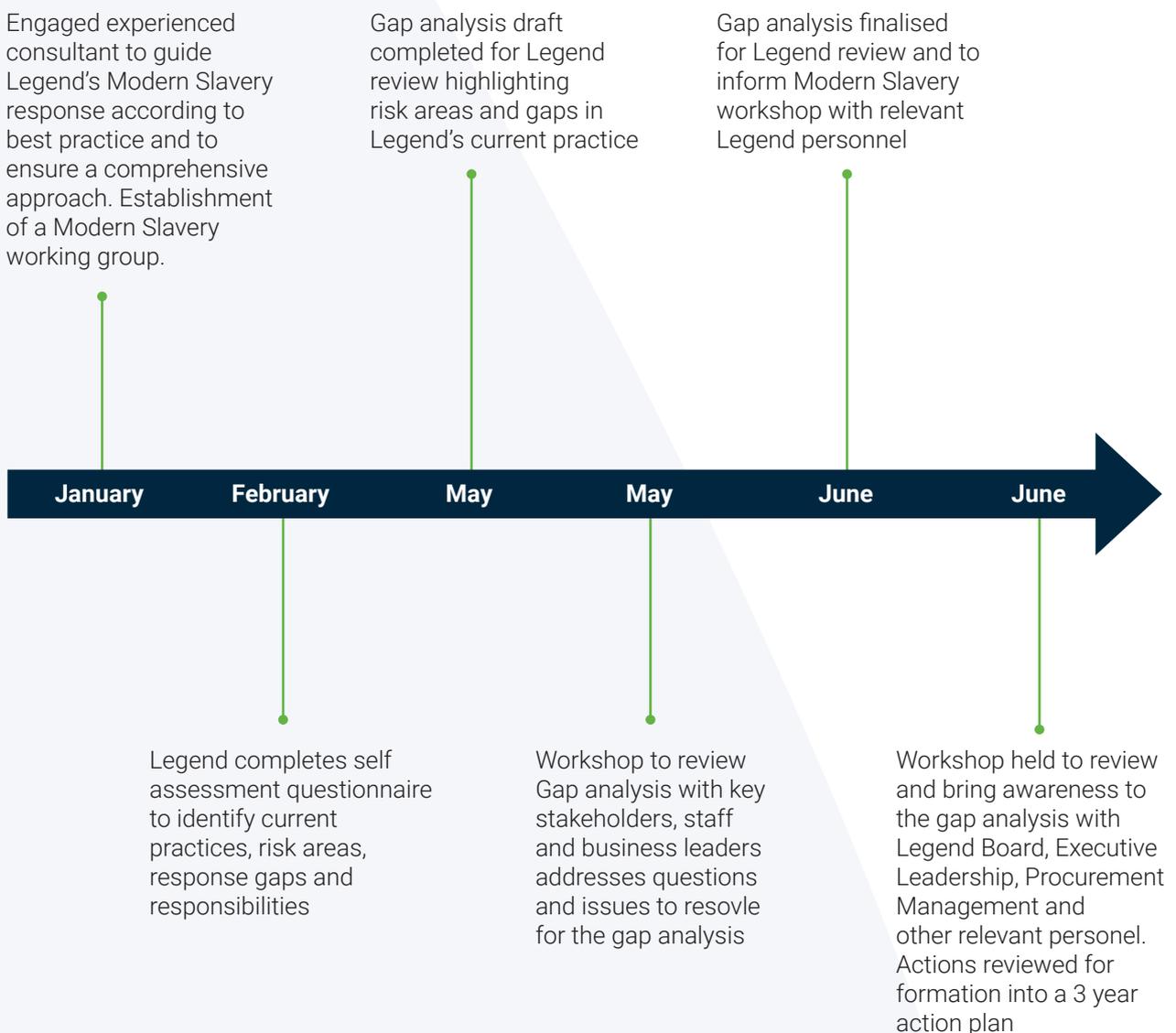
Processes and Practices in place during the reporting period included:

Regular Supplier Audits	Legend, through its procurement team, conducts regular supplier audits of current and potential suppliers. There is a formal supplier audit questionnaire and process for documenting and recording results. In this reporting period a footprint in China has been established to enable more regular audits COVID-19 Impact: During FY20 international travel was restricted which prohibited Legend personnel being able to visit our international suppliers. However, our China office, once allowed to travel, was able to continue our supplier audit program
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 in the process of approval at the end of FY20
Recruiting Policies	Legend has a set of recruitment policies and practices that comply with relevant federal and state regulations

Modern Slavery Risk-Specific Actions During the Reporting Period

In FY20 Legend identified its obligation to report on modern slavery and its need to improve its practices to develop an effective response to modern slavery risks. Legend engaged an experienced consultant to guide a detailed program of work during the reporting period to develop our understanding of modern slavery risks in our operations and supply chains and our response to ensure a best practice and comprehensive approach.

Legend FY20 Modern Slavery Timeline



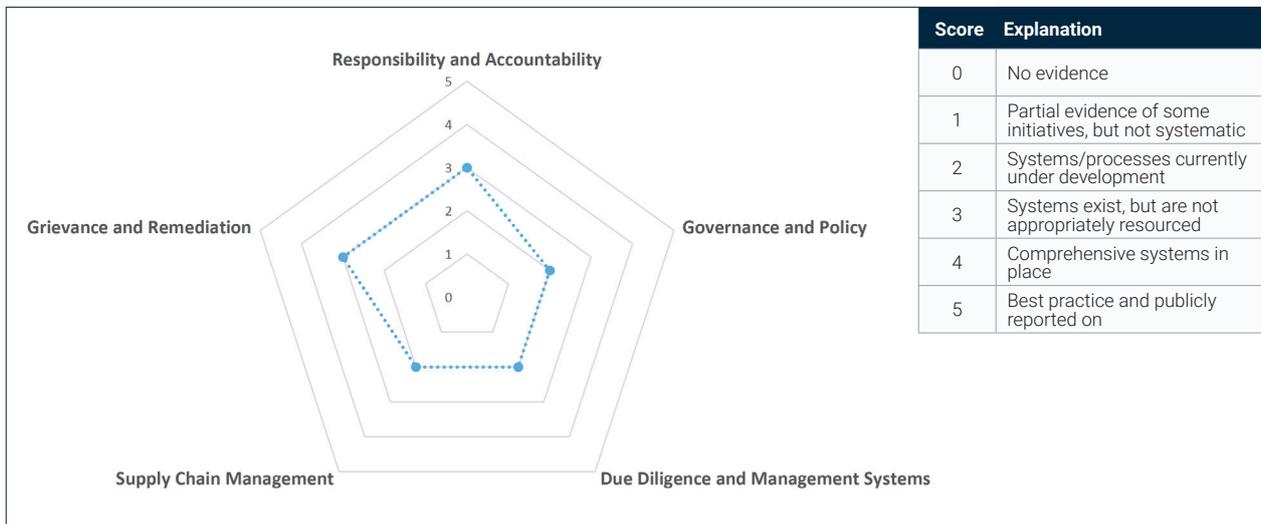
Describe how the reporting entity assesses the effectiveness of these actions

In this period Legend focused on the education and discovery phase of its modern slavery risk response. This phase of the response concluded in June 2020 and resulted in a set of actions being identified to minimise the risk that Legend causes, contributes or is directly linked to Modern Slavery.

As part of the work carried out during the reporting period, a readiness assessment in relation to Legend’s own modern slavery-related systems and processes was conducted and the findings are shown in the spider chart below. This will serve as a baseline for measuring effectiveness of our actions in the 2021 reporting period.

Legend provides a monthly report on Modern Slavery risk to it’s board by the National Safety/Health/Environment/Quality Manager. This role includes performance measures for modern slavery risk management, mitigation and reporting.

Modern Slavery Readiness Assessment



One of the key action items for the next reporting period is to develop an approach to measuring the effectiveness of our actions, including KPIs – see Other Relevant Information below, ‘Our plans for 2021’.

The Process of Consultation

Within the Legend business, Legend owns or controls a number of entities for the purposes of the Modern Slavery Act. A number of these entities can be described as “dormant entities” and do not engage in any trading or business activities. This means that many of these entities do not have any operations or supply chains.

Set out in the table below are descriptions and information required by the Modern Slavery Act in respect of the entities that Legend owns or controls.

Entity that Legend owns or controls	Risks of modern slavery practices in the operations and supply chains of the entity	Actions taken to assess and address modern slavery risks in the operations or supply chains of the entity	Process of consultation between Legend and the entity
Legend Corporate Services Pty Ltd (ACN 006 722 292) System Control Engineering Pty Ltd (ACN 082 835 292) Celemetrix Australia Pty Ltd (ACN 117 603 835) Hendon Semiconductors Pty Ltd (ACN 080 879 616) Commsforce Pty Ltd (ACN 103 510 498) MH Legend Power Pty Ltd (ACN 051 792 833) System Control Engineering NZ Limited Co#112889 Ecco Pacific Limited Co# 895659 M+H Power Pacific Limited Co#1062493	See “Modern Slavery Risks in Legend Operations” and “Modern Slavery Risks in Legend Supply Chains” sections above	See “Actions taken to assess and address modern slavery risks in reporting period” section above	Legend owns all the shares of these entities and the directors of these entities are also directors of Legend. It was therefore not necessary for Legend to consult with these entities to obtain the information set out in this Modern Slavery Statement.
Legend (Pacific) Pty Ltd (ACN 058 198 075) IES Investments Pty Ltd (ACN 105 001 189) Cable Accessories Holdings Pty Ltd (ACN 003 213 358) Cable Accessories (Australia) Pty Ltd (ACN 002 184 616) CABAC Projects Pty Ltd (ACN 117 215 415) Celemetrix SRC Pty Ltd (ACN 133 000 745) Circle Power Electrical Data Pty Ltd (ACN 113 923 078) MSS Fibre Systems Pty Ltd (ACN 102 221 698)	No risk of modern slavery practices occur in any of these entities’ operations or supply chains on the basis they are dormant entities	N/A	N/A

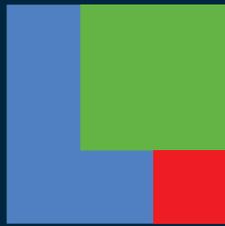
Our Plans for 2021

Legend recognises that it is only beginning its response and that there is much to do to integrate a comprehensive approach to minimising the risk of Modern Slavery. From the workshop with the Board, Executive and Senior leaders in June an action plan was developed and brief summary of the actions in progress or planned for the FY21 period are included below.

Area for Development	Level of Commitment	Time Frame
Policies and commitments		
Review update and formalize modern slavery related responsibilities and accountabilities	Compliance	Q1
Create 3-year Modern Slavery Action Plan	Beyond Compliance	Q3
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	Q3
Board		
Conduct Board Level awareness training to increase awareness of Modern Slavery risks and obligations	Beyond Compliance	Q2
Responsibilities: Board		
The Board reviews Modern Slavery Risks regularly during Board Meetings.	Beyond Compliance	Q3
Ensure commitment to Board oversight of Modern Slavery risk (own ops) is documented within position descriptions and Board Charter. Related to the overarching Risk management framework	Beyond Compliance	Q3
Management		
Have Management personnel involved in government and multi-stakeholder dialogues and keep records of involvement.	Best Practice	Q4
Responsibilities: Management		
Introduce Modern Slavery KPIs for Management Personnel (based on 3-year Modern Slavery Action Plan)	Best practice	Q2
Ensure specific function for overseeing Modern Slavery within Quality/ Purchasing is documented in position description and official responsibilities	Beyond Compliance	Q3

Our Plans for 2021

Area for Development	Level of Commitment	Time Frame
Due Diligence: Supply Chain		
Perform supplier risk analysis with high spend suppliers	Compliance	Q1
Build out Supplier Mapping Table	Beyond Compliance	Q2
Incorporate Modern Slavery / Human Rights Criteria into audit frameworks across the business	Beyond Compliance	Q4
Follow up high risk and high priority suppliers with SAQs to further develop supplier risk profiles	Beyond Compliance	Q3
Create guideline material for suppliers regarding modern slavery. Incorporate into onboarding process	Beyond Compliance	Q3
Explore supplier platforms that currently exist (e.g. SEDEX, Amfori, Verite)	Beyond Compliance	Q4
Supply chain transparency exercises (and asking suppliers about their suppliers)	Best Practice	Q4
Due Diligence: Operations		
Assess own operations exposures to modern slavery risk	Compliance	Q1
Confirm that workers ages are verified and ensure casual workers under 18 are not engaged in dangerous or hazardous work	Compliance	Q1
Embed Modern Slavery risk into existing Risk Assessment framework / in alignment with Corporate -Wide Risk Assessment Management Framework	Beyond Compliance	Q2



LEGEND

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