

Modern Slavery Statement

March 2021



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About Logicalis Australia

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

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

Logicalis Australia is part of the Logicalis Group, a global company operating in 28 countries, employing more than 6,600 staff with global revenues of approximately USD\$1.7bn for the year ending 29 February 2020.

Logicalis is part of the Datatec Group. 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. The Group's offerings span the technology distribution, integration and consulting sectors of the ICT market. Datatec's shares are listed on the Johannesburg Stock Exchange (JSE). The largest shareholders are South African investment managers which are among more than approximately 3,000 shareholders spread across the world.

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

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



Our Statement

This joint statement, pursuant to s54(1) of the Modern Slavery Act 2015 (UK) and 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 2020.

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 stakeholders who may be involved in the direct operations of our business, as well as upstream and downstream from our business.

Logicalis Australia take a proactive and zero-tolerance approach to Modern Slavery across its global 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 275 employees and contractors located in Victoria, New South Wales, Queensland, Western Australia, Tasmania, Malaysia and Brunei.

Logicalis Australia earns annual revenues of approximately \$120m AUD. More than 95% of its income is generated through business transactions with Australian companies and organisations.

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

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

Logicalis' operating companies, such as Logicalis Australia, are typically established in a jurisdiction to sell into the local market. They purchase IT products predominantly from third party technology vendors and distributors and sell to third party customers. The majority of Logicalis Australia's purchases are therefore procured from entities based within Australia, though a portion (less than 5% in both number of suppliers and value of supplies purchased) are procured from entities domiciled outside of Australia. As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains our Group is required to ensure that supplier contracts with all new suppliers comply with our Code of Conduct and Supplier Onboarding Policies. Logicalis Australia is instituting a process to do this by way of requiring its key suppliers to complete modern slavery questionnaires and we intend to take appropriate actions if the reply indicates an area of concern.



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 the Code. The training course encourages employees to identify and report any potential breaches of code of conduct allegations and gives details to our independent whistleblowing hotline. The training and code of conduct policies are regularly reviewed and updated.

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

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 anti-slavery policies and procedures.

Whilst there was 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 has established a committee which meets quarterly to oversee the company's compliance with modern slavery requirements and can convene on short notice at other times should a material non-compliance be detected.

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

This joint statement was approved by the Logicalis Australia Holdings Pty Ltd Board on 15 March 2021. Should you have any queries or feedback in relation to this statement, please contact the Company Secretary via email: treddoch@au.logicalis.com.

COVID19

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

Logicalis Group Policy

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



LOGICALIS GROUP LIMITED

STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

Introduction

Logicalis Group Limited is 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 Electronic Industry Citizenship Coalition Code of Conduct (<http://www.eiccoalition.org/standards/code-of-conduct/>) ("The UN Principles").

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

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

Suppliers

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

Risk and compliance

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

Training

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

Further actions

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

Signature

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Logicalis Group's Limited's slavery and human trafficking statement for the financial year commencing 1st March 2019 and ending 29th February 2020. The statement also relates to its following subsidiaries:

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



Leopoldo Dal Bianco
Company Secretary
Logicalis Group Limited

Date: