

Modern Slavery Statement

Year ending 28 February 2026



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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, 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. Logicalis Australia Holdings Pty Ltd owns and controls Logicalis Australia Pty Ltd and Logicalis Asia Pacific MSC Sdn. Bhd.

The immediate parent entity is Logicalis International Limited 'Logicalis International' (incorporated in the UK) and the ultimate parent entity is Datatec Limited (incorporated in South Africa).

Logicalis Australia is part of Logicalis International, a global company operating in over 20 countries, employing 4 254 staff with global net revenues of USD\$1.25bn for the year ending 28 February 2026.

Logicalis International 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 and employs 11,049 people. 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 Government Employees Pension Fund (PIC), and Founder, CEO, and Director Mr Montanana which are among the 7,124 shareholders.

Datatec's operating divisions include 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 28 February 2026 and through the year to date commencing 1 March 2026 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, Logicalis International and its ultimate parent, Datatec, 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 takes 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 Melbourne, Sydney and Cyberjaya (Malaysia), and has 267 employees located in Australia and Malaysia.

In 2026 Logicalis Australia earned revenues of approximately \$105m AUD. More than 99% of Logicalis Australia's gross revenue is generated through business transactions in Australia.

To meet the needs of its corporate and public sector customers, Logicalis Australia partners with leading multinational technology vendors typically headquartered in the United States of America or the United Kingdom. These partners have 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 Australia purchases IT hardware, software, and services predominantly from third party technology vendors and distributors. The majority of Logicalis Australia's purchases are procured from entities based within Australia, though a portion (14% of suppliers and 4% of the value of supplies purchased) are procured from entities domiciled outside of Australia. These figures do not include Logicalis International owned entities, who are required to adhere to the Modern Slavery Act 2015 UK, or to statutory payments made by Logicalis Australia.

Logicalis Australia reviews each of these suppliers who are based outside of Australia and the region they are from to assess the likelihood of Modern Slavery. Of the 10 foreign countries that Logicalis Australia procured from during FY2026, all are considered to have a low risk. This was determined based on the goods and services the supplier sold, their business model, and the country in which they operated in, along with external research on those countries from Walk Free, an international human rights group.

Logicalis Australia employs staff with the relevant skill sets to be able to deliver and sell professional services and managed services, as well as providing corporate support services. In Australia almost all staff are employees of the business with only minor use of contractors. When contractors are used these are sourced locally. Logicalis Australia has a strong presence in Malaysia. The majority of workers in its Malaysian subsidiary are employees of the business, with only a minor number of casual staff.

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 within our immediate supply chain it was concluded that we do not cause or contribute to modern slavery risks. Furthermore, we consider that the risk of modern slavery occurring in our first tier and second tier supply chain is low as most of Logicalis Australia's 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 General Manager 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 28 February 2026 and the requisite responses were received from suppliers representing 82% of Logicalis' supplier spend. 80% of suppliers reviewed have completed the questionnaire.

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, and meetings of the Modern Slavery Committee to address processes.

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 International Group Holding 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 statement is signed by Lisa Fortey in her role as Director of Logicalis Australia Holdings Pty Ltd, a responsible member of its board, being the principal governing body of Logicalis Australia Holdings Pty Ltd.


Lisa Fortey (Sep 3, 2026 09:24:57 GMT+10)

Lisa Fortey
Director of Logicalis Australia Holdings Pty Ltd

This joint statement was prepared by Logicalis Australia Holdings Pty Ltd and it applies to Logicalis Australia Holdings Pty Ltd and the entities it owns and controls, Logicalis Australia Pty Ltd, and Logicalis Asia Pacific MSC Sdn. Bhd. It was approved by the Board of Logicalis Australia Holdings Pty Ltd on 31 August 2026. 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 Company Secretary via email: david.bentley@au.logicalis.com.

Logicalis International Limited, domiciled in the United Kingdom and the parent entity of the Logicalis Australia Holdings Pty Ltd, 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 INTERNATIONAL

Financial year: 1 March 2025 to 28 February 2026

STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

1. Introduction

Logicalis International recognises that modern slavery and human trafficking can occur in many sectors and geographies and can have severe and long-lasting impacts on individuals and communities. We are committed to preventing modern slavery and human trafficking in our operations and across our supply chains, and to acting with transparency and continuous improvement. We expect our suppliers, contractors and business partners to uphold equivalent standards.

2. Organisational structure, business and supply chains

Logicalis International Group Holding Limited and its subsidiaries (together, the "Group") deliver digital infrastructure and related services in more than 20 countries to customers and work with a broad range of suppliers, from major manufacturers and distributors of IT equipment and software to service providers and other indirect suppliers. The ultimate parent company of Logicalis International Group Holding Limited is Datatec Limited, incorporated in South Africa and listed on the Johannesburg Stock Exchange.

Our supply chain is extensive and global. It includes (i) Tier 1 suppliers (manufacturers and distributors of IT hardware and software), (ii) subcontractors and partners providing specialist delivery, logistics and professional services, and (iii) business services suppliers such as facilities management and professional advisers. We recognise that modern slavery risks may sit beyond Tier 1, including in electronics manufacturing and raw material extraction, and we therefore seek to improve visibility over time in higher-risk categories.

3. Policies and governance

Our approach is supported by policies and standards that set expectations for ethical conduct, respect for human rights and responsible business practices. We align our approach with recognised international frameworks, including the Ten Principles of the UN Global Compact and the Responsible Business Alliance (RBA) Code of Conduct.

The Code of Conduct (which applies across the Group) sets expectations on integrity, fair treatment, non-discrimination and responsible sourcing. It includes independent channels for raising concerns, including suspected modern slavery, and supports a culture where concerns can be raised without retaliation.

We expect suppliers and business partners to operate in compliance with applicable laws and to maintain standards that are consistent with our values, including prohibitions on forced labour and human trafficking. Where appropriate, these expectations are reflected in supplier onboarding and contractual terms, together with the ability to require remediation if concerns are identified.

Governance and oversight are supported through established group forums. Material compliance concerns, including those relating to modern slavery or any breaches of the Code of Conduct may be escalated for reporting to relevant governance committees (including the Logicalis and Datatec Audit, Risk and Compliance Committees as appropriate), together with remediation actions undertaken.

In addition, the Logicalis Social and Ethics Committee, continues to monitor the activities of the Group in areas including, social and economic development, good corporate citizenship, labour and employment, and the environment, health and public safety, supporting our wider approach to responsible business.

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4. Due diligence

We integrate modern slavery considerations into relevant procurement and supplier management activities. Our due diligence approach is risk-based and proportionate, and may include:

- supplier onboarding checks (including confirmation of alignment with our Code of Conduct and, where appropriate, review of a supplier's own modern slavery statement and related policies);
- contractual expectations, including compliance with applicable laws and standards and the ability to require remediation where concerns are identified;
- risk-based engagement with suppliers (for example, targeted questionnaires and periodic reviews) focusing on labour practices, recruitment fees, worker welfare, and subcontracting controls;
- escalation processes where potential issues are identified, including working with suppliers on corrective action plans; and
- leveraging industry initiatives and supplier programmes (including those of key technology manufacturers and distributors) where relevant to improve supply chain visibility beyond Tier 1.

5. Assessing and managing risk

The Group proactively evaluates the nature and extent of our exposure to the risk of modern slavery occurring in our operations and supply chain. Our risk assessment considers (among other factors) supplier type and sector, geography, reliance on subcontracted labour, use of temporary or agency workers, and the nature of goods (including electronics manufacturing and raw material extraction). We recognise that our highest risks for modern slavery are not in our direct operations but deeper within our supply chain, particularly in the manufacturing of electronic components and the extraction of raw materials (such as conflict minerals) used in the products we procure. Accordingly, we seek to embed risk-based checks into our supplier onboarding processes and to improve visibility over time.

6. Monitoring and evaluation

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 Tier 1 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.

We seek to monitor and evaluate the effectiveness of our approach and to improve it year-on-year. Depending on the maturity of local processes, measures we use may include:

- completion rates for Code of Conduct training and targeted modern slavery awareness training for relevant roles (e.g., procurement, HR, contract management);
- number of suppliers asked to confirm alignment with our Code of Conduct and/or provide evidence of their modern slavery controls;
- number and nature of issues raised through whistleblowing channels or other grievance mechanisms, and time to triage and close-out;
- outcomes of any risk-based supplier engagements, reviews or audits (including corrective actions agreed and completed); and
- internal reporting to appropriate governance forums on material risks, incidents and remediation actions.

7. Remediation and speaking up

We take all reported concerns seriously and where slavery risks or indicators are identified, our approach is to prioritise the safety and rights of impacted individuals and to work with relevant parties

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to achieve appropriate remediation. Depending on the circumstances, actions may include investigation and escalation, corrective action plans and follow-up, additional training, or (where the issue is severe and remediation is not achievable) suspension or termination of the business relationship.

8. Continuous improvement

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 conducting audits on smaller suppliers in the Tier 1 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.

Over the next reporting cycle, we will focus on: (i) improving visibility beyond Tier 1 where feasible; (ii) further embedding risk-based modern slavery checks into supplier onboarding and contract management; (iii) enhancing the capture and reporting of effectiveness measures (including agreed KPIs); and (iv) continuing to review and update relevant policies, procedures and risk assessment methodologies to ensure they remain effective and aligned to evolving guidance and best practice.

9. Approval and signature

This statement has been approved by the board of directors of Logicalis International Group Holding Limited and is signed by a director on its behalf. This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Logicalis International Group Holding Limited's slavery and human trafficking statement for the financial year commencing 1st March 2025 and ending 28th February 2026.

This statement also relates to the following subsidiaries and their operations:

1. Logicalis International Limited
2. Logicalis Group Finance Limited

A copy of this statement will be published on our website and, where applicable, submitted to the UK modern slavery statement registry.

Robert Bailksoki

Director

Logicalis International Group Holding Limited

Date: 12 May 2026

Modern Slavery Statement 28 February 2026 Draft

Final Audit Report

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