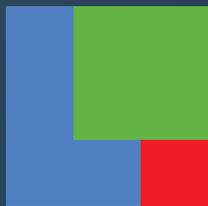


# Legend Corporate Modern Slavery Statement FY23

DECEMBER 2023



**LEGEND**

THE POWER TO TRANSFORM

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

# Statement from Bryan Tisher, CEO and Andrew Bullock, Chairman

Legend Corporation Pty Ltd's progress in addressing the risks of Modern Slavery during the 2023 reporting period from July 1, 2022, to June 30, 2023 is outlined in this statement.

As a company, we are dedicated to ethically sourcing and protecting human rights in the procurement of goods and services for our customers. We recognise our role in the supply chain and have incorporated in our Responsible Procurement Policy and Supplier Code of Conduct in ensuring that our suppliers do not use forced or child labour, that they provide safe and healthy working conditions, that they do not discriminate in their hiring practices, and do not take part in any form of Modern Slavery practices.

To assess our progress in reducing the risk of Modern Slavery in our supply chain, we have established measurable goals and conduct regular risk assessments. We acknowledge the complexity and ongoing nature of this challenge and remain committed to addressing these issues with our suppliers, promoting education and eliminating Modern Slavery from our operations and supply chain.

## Process of Consultation

The development of this statement was led by the Procurement Team, which consulted directly with key functions across the Group discussing details of the Modern Slavery Act 2018's reporting requirements, risk analysis, and future action plans. For the preparation of this statement in assessing and addressing the risks of modern slavery practices in the operation and supply chains, the Legend Group entities were actively engaged and consulted. All the Legend Group entities have a common management structure and common management personnel within the Legend Corporation Pty Limited group.

This statement has been reviewed and approved by the Chief Executive Officer and the Board of Directors of Legend in their capacity as principal governing body of Legend Corporation Pty Limited on the 13th December 2023.



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**

# Executive Summary

This Statement has been prepared in compliance with the Modern Slavery Act 2018 (Cth) ('Modern Slavery Act'). It presents the risks associated with Modern Slavery in the operations and supply chains of Legend, as well as the measures taken to mitigate these risks during the period spanning from July 1, 2022, to June 30, 2023 (**FY23 reporting period**).

This report encompasses:

- **Company Overview:** A comprehensive overview of the Legend Corporation's business, encompassing its structure, seven sales business units, operations, and supply chains.
- **Policy Framework:** Our policy framework that eliminates the tolerance of modern slavery in all its forms.
- **Risk Assessment:** We conduct thorough due diligence processes to assess and manage modern slavery risks within our supply chains. This includes evaluating our suppliers, conducting risk assessments, and monitoring compliance with our policies.
- **Management Systems:** Systems to identify, assess, address, and proactively manage modern slavery risks in our organisation and supply chain.
- **Action Plan:** We are committed to continuous improvement in our practices and processes related to modern slavery. We regularly review and update our policies and procedures to align with emerging best practices and evolving legal requirements. Through ongoing monitoring, evaluation, and feedback mechanisms, we strive to enhance our effectiveness in combating modern slavery.

Over the past year, we have made significant progress in reducing Modern Slavery risks within our supply chain and operations. This statement highlights the specific initiatives that have been

integrated into our daily business activities.

Through our supplier auditing program, we have engaged using a supplier auditing questionnaire ('**SAQ**') with 90% of our suppliers based on annual spend and the results show no signs of Modern Slavery practices.

At Legend, we are dedicated to exclusively engaging with suppliers who are known to refrain from any form of Modern Slavery or human rights violations. Legend's day-to-day management of Modern Slavery resides within the Group Procurement Team and our risk management processes and responsible procurement policy act as safeguards against the entry of suppliers involved in or exhibiting signs of Modern Slavery. Additionally, we have established a remediation process to address any instances of Modern Slavery or human rights abuses that may arise with our current suppliers.

During our current financial year 2023 and upcoming financial year 2024 we have engaged the services of an external consultant to conduct an updated risk assessment and gap analysis. This work will evaluate suppliers based on risk commodities and countries, as well as review product risk ratings using 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. It will also enable us to identify actions for enhancing performance and processes moving forward to eliminate modern slavery in our operations and supply chains.

We are fully committed to identifying and eradicating Modern Slavery and we will continue to take decisive action to achieve this goal.

**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. For completeness and compliance with the Modern Slavery Act, where our structure, operations and supply chain (and those of our subsidiary companies) have remained the same since the last reporting period, we have re-stated the same information in this statement.

All of the subsidiary companies described in our structure 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.

We are 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, 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 270 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.



# 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

**Legend Corporation Pty Ltd**  
ACN 102631087

In the FY23 reporting period there was a demerger of the entities **System Control Engineering Pty Ltd ACN 082 835 292** and **System Control Engineering NZ Limited Co #112889**.

## (D) Dormant Entities

Legend owns or controls a number of 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



## **CABAC**

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

### **DESCRIPTION OF OPERATIONS**

CABAC has 159 employees. Its head office is in Sydney with sites in Melbourne, Brisbane, Adelaide, Perth and New Zealand.

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 \$22M spread over 157 suppliers from 21 countries. The principal countries of supply were the People's Republic of China, Belgium, India, Thailand, Taiwan, and Australia. The main products supplied were cabling accessories. Its supplier arrangements were mainly stable and based on long-term relationships.

# 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 41 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.

On the 30th March 2023 there was a demerger of the entities System Control Engineering Pty Ltd ACN 082 835 292 and System Control Engineering NZ Limited Co #112889 and are no longer part of the Legend Group for the upcoming reporting period.

### SUPPLY CHAIN SUMMARY

During the reporting period SCE had a total spend of \$20M spread across 248 suppliers from a diverse supplier base in Italy, Australia, People's Republic of China, Thailand, 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 2 employees, 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 3 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 5 employees. Its head office is in Sydney with a site also in New Zealand.

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 \$5.8M spread across 68 suppliers from 7 countries. The principal countries of supply were the People's Republic of China, Australia, Spain, and Singapore. The main products supplied were batteries, solar products, and emergency lighting. Its supplier arrangements were mainly stable and based on long-term relationships.

# Our Operations and Supply Chain



## **MSS Data Solutions** We make unique solutions happen.

### **DESCRIPTION OF OPERATIONS**

MSS Data Solutions has 17 employees. Its head office is in Melbourne with further sites in Sydney and Perth.

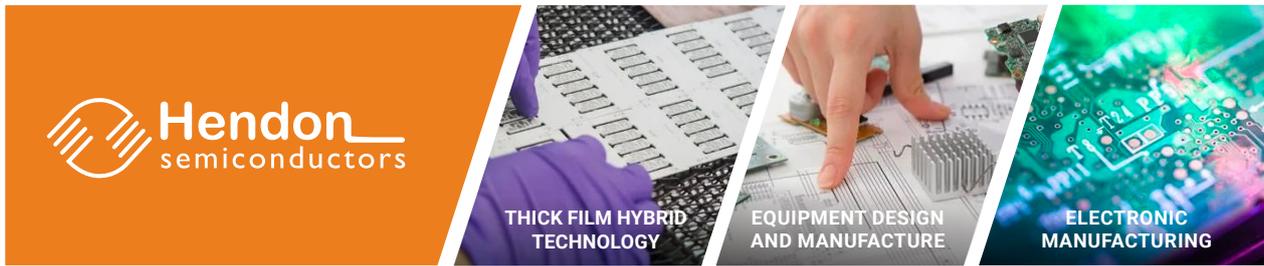
MSS Data Solutions is the established market leader in fibre optic and innovation for communications cabling, providing end-to-end solutions for the needs of any project. With 20 years of experience, we guarantee a faster, more efficient service for the enterprise, industrial and telecommunications industries 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 \$8.2M spread across 66 suppliers from 8 countries including Australia, Canada, Hong Kong, and Italy. The main products supplied were telecommunications infrastructure hardware and software. Its supplier arrangements were mainly stable and based on long-term relationships.

# Our Operations and Supply Chain



## Hendon Semiconductors

Specialised Engineering and manufacturing PCB services since 1962.

### DESCRIPTION OF OPERATIONS

Hendon Semiconductor has 28 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 \$1.6M spread across 192 suppliers across 10 countries. These suppliers are in Singapore, the People's Republic of China, Hong Kong, the USA, and Australia. The main products supplied were electronic components. Its supplier arrangements were mainly stable and based on long-term relationships.

# 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 18 employees. It has offices and operations in Sydney, 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 Power had a total spend of approximately \$14M spread over 185 suppliers across 15 countries, principally from the USA, the People's Republic of China, and Australia. 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 Power's operations were reviewed soon after acquisition for modern slavery risk and there were no adverse findings.

# Policy Framework

Policies and processes have been implemented to reduce the risk of Legend contributing to modern slavery in its operations and supply chains. Current policies and processes include:

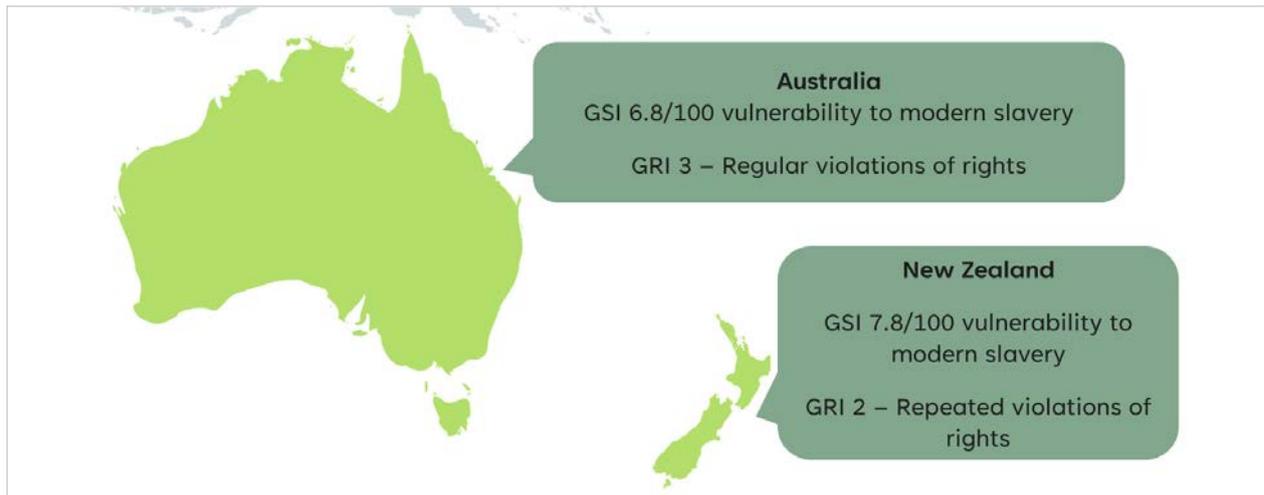
<p><b>Whistle Blower Policy</b></p>	<p>Legend has a whistle blower policy and process that allows reporting of grievances to Legend or a 3rd party. This policy was updated and approved in 2021. There was a comprehensive training program given to all Legend people managers. The Whistleblower policy was also disseminated to all employees.</p>
<p><b>Recruiting Policies</b></p>	<p>Legend has a set of recruitment policies and practices that comply with relevant federal and state regulations. This policy was reviewed in 2021.</p>
<p><b>Legend Code of Conduct</b></p>	<p>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. This policy was reviewed in 2023.</p>
<p><b>Remediation Process</b></p>	<p>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. This policy was introduced in 2022.</p>
<p><b>Responsible Procurement Policy</b></p>	<p>This policy sets out key considerations when making purchasing decisions and supplier engagement, in line with Legend's ethical approach to sourcing. It describes our commitment to ensuring that our procurement practices respect human rights, support positive impacts on the environment and the communities where we work. This policy was introduced in the current report period July 1, 2022, to June 30, 2023.</p>
<p><b>Supplier Code of Conduct</b></p>	<p>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 also covers the consequences of a breach in the Code of Conduct. This policy was introduced in the current report period July 1, 2022, to June 30, 2023.</p>

# Modern Slavery Risk Assessment

In the FY23 period Legend engaged an external third-party consultant to conduct a Modern Slavery Risk Assessment to provide a snapshot of Legend's risks of modern slavery in their own operations and supply chain. It was determined that Legend's modern slavery risk exposure is higher through the supply chain than through its own operations.

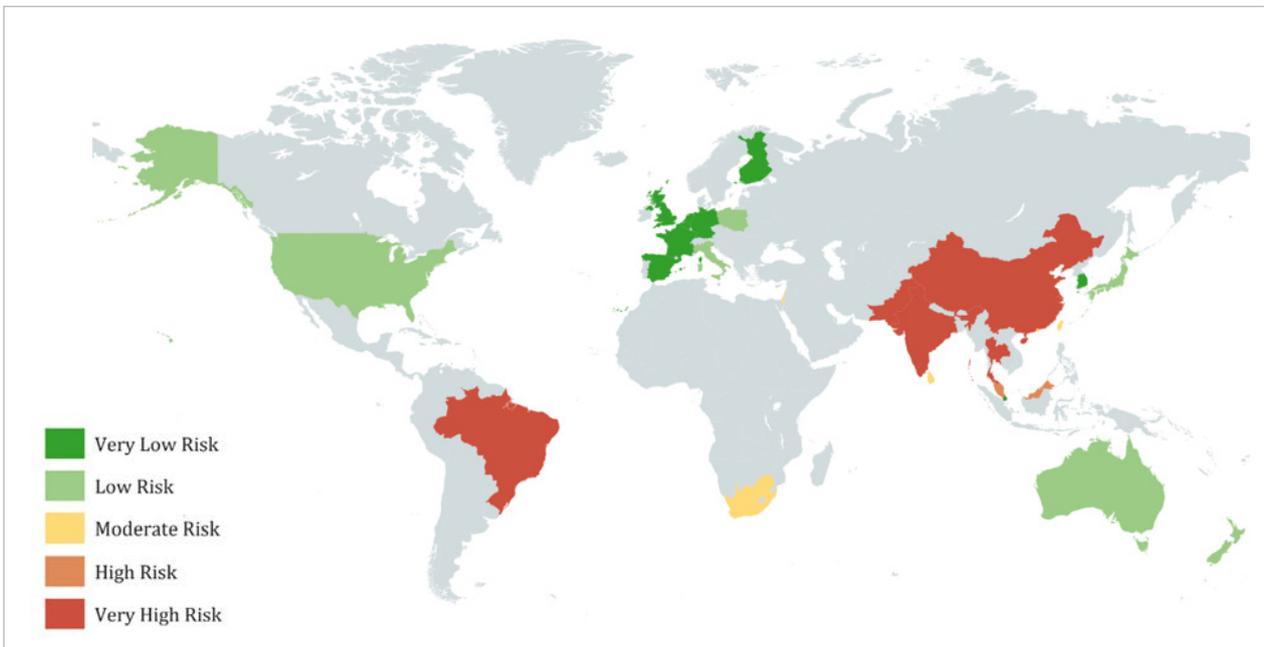
**Figure A.**

Operations Modern Slavery risk by Country



**Figure B.**

International Suppliers and Modern Slavery risk by region



The key findings in the Risk Assessment were the risks of modern slavery within Legend's supply chain. Legend has a diverse supply chain across its group entities and divisions, with over 900 suppliers including countries with high or very high-risk including China, Pakistan, India, Brazil, Thailand and Malaysia

# Modern Slavery Risk Assessment

Legend sources and produces a large range of products including lugs and links, nylon cable ties and glands, conduits, battery crimpers, heat shrink, hand tools, solar batteries, semi-conductors, and high voltage equipment.

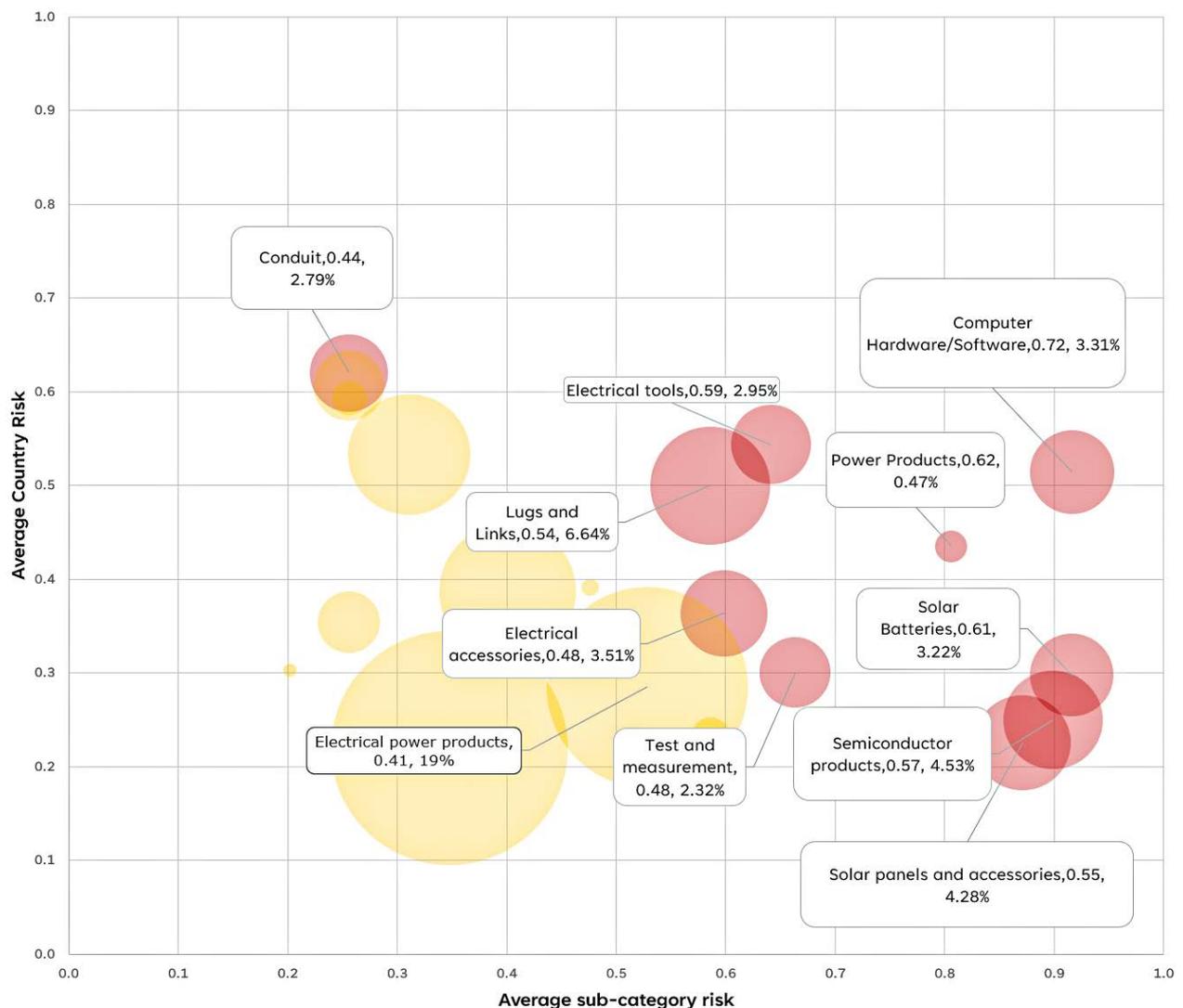
Services procured by Legend include recruitment, legal, cleaning services, construction, property maintenance, waste disposal and equipment maintenance.

Legend sources electrical equipment, infrastructure materials, finished goods and related materials such as Protective Equipment & Textiles for selling and manufacture of other products.

Electrical components may partially or wholly include Copper, Tin, Tungsten, Coltan (Tantalum) and Gold (3TG minerals), Semiconductors, Silica-based products, Steel, Solar PV and Zinc. Each of these carries inherent modern slavery risks demonstrated in Figure B.

**Figure C.**

Product Categories and Modern Slavery risk by product category and region.



# 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 and supply chain.

We assess the effectiveness of our actions, by considering the following areas:

- Understanding the risks within our Operations and Supply Chain;
- The risk results identified in the Supplier Audit Questionnaire;
- Stakeholder feedback, including from suppliers, internal stakeholders, and external stakeholders;
- The effectiveness of our key indicators for the FY 2023 reporting period.

**Table 1. Key Indicators**

Elements	Assessment	Status
<b>Policies and governance</b>		
Policy framework	Reviewing current policies relating to modern slavery and other human rights violations regularly to ensure they are fit for purpose and are being implemented across the organisation.	Regularly reviewed ✓
Reporting	There have been no reports of modern slavery or any other human rights violation via the whistle blower program or any other sources from suppliers, internal stakeholders, or external stakeholders.	No signs of Modern Slavery ✓
<b>Risk Assessment</b>		
Risk Assessment Process	Monitoring risk through a combination of supplier audit questionnaires and third-party risk assessments.	Regular supplier audits and risk assessment complete ✓
Risk Mitigation	Mitigating risk by following the Responsible Procurement policy and conducting third-party gap analysis	Policy launched and executed ✓
<b>Communication</b>		
Training Program	Employee training on modern slavery and human rights violations	Complete ✓
Supplier Awareness	Provide suppliers with a Supplier Code of Conduct setting expectations in relation to human rights and responsible sourcing, including modern slavery.	Complete ✓
<b>Communication</b>		
Remediation Process	Ensure the remediation process provides mechanisms to take corrective action.	Complete ✓

# Current and Future Action Plan

Since our first modern slavery statement in FY 2020, we have understood that having a structured approach to engaging with our suppliers, enhances our effectiveness. For example, introducing our Supplier Code of Conduct established a formal process to address supplier non-conformances and support fundamental labour rights.

In the upcoming reporting 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 conduct a third-party gap analysis in the financial year 2024 to further our risk mitigation processes.

Below is a summary of the actions completed, in progress, or planned for Legend's FY 2024 period.

## Completed actions

Produce a Responsible Procurement Policy which governs purchasing decisions, including thresholds, key principles, and considerations when making purchasing decisions.

Produce a Supplier Code of Conduct which sets out the key requirements and responsibilities shared between Legend and our suppliers.

Engage an external third-party consultant to conduct a Modern Slavery Risk Assessment to provide a snapshot of operations and supply chain risks within the Legend Group.

## Continued development

Creating a more targeted risk-based due diligence program for more prevalent risk commodities or regions.

Implement improved processes and actions based on the results from the FY23 third-party risk assessment.

Improving our guideline and training material for suppliers regarding modern slavery.

Monitoring and reviewing our Key Indicators for the upcoming report period.

## For development

Engage with an external consultant to conduct an updated gap analysis.

Expanding on the supplier auditing program by conducting on-site factory and worker audits.

Introducing a Risk-Management Framework to provide the structure, process, and tools that will provide a consistent approach to managing risk.

# Appendix

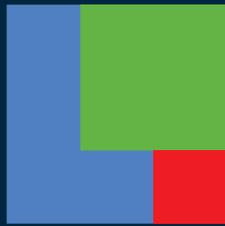
## Compliance with the Modern Slavery Act Requirement

The below table identifies where information related to each mandatory reporting criteria set out in the Australian Modern Slavery Act can be located within the report.

Mandatory Criteria for Modern Slavery Statements	Section of Information	Page Number
Identify the reporting entity	About Us	4
Describe the structure, operations and supply chains of the reporting entity	Our Structure, and Our Operations and Supply Chain	5 - 12
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 Risk Assessment	14, 15
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	Policy Framework, and Current and Future Action Plan	13, 17
Describe how the reporting entity assesses the effectiveness of such actions	How we address the effectiveness of our actions	16
Describe the process of consultation with any entities that the reporting entity owns or controls	Statement from Bryan Tisher, CEO and Andrew Bullock, Chairman	2
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Executive Summary	3

*“Legend Corporation,  
where technology &  
environment work  
in harmony for  
a sustainable  
future”*





**LEGEND**

THE POWER TO TRANSFORM

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