LOGICALIS GROUP LIMITED

STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

Introduction
Logicalis Group Limited recognises that modern slavery practices can have severe, wide-ranging and long-lasting impacts on stakeholders and is therefore 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 Responsible Business Alliance (formerly Electronic Industry Citizenship Coalition) Code of Conduct (“The UN Principles”). (Code of Conduct 7.0 (responsiblebusiness.org))

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.

Regular reporting of any breaches of the Code of Conduct is completed by Logicalis Group, 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.
In addition, this year the Logicalis Group Board approved the constitution of a Social and Ethics Committee required to monitor the activities of the company in areas such as social and economic development, good corporate citizenship, labour and employment, and the environment, health and public safety.

**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, guidance has been issued to all our affiliates in relation to the on-boarding of new suppliers and 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.

**COVID-19**

The COVID-19 pandemic continued to cause 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 are evolving as the world adjusts and there may continue to be increased pressures on vulnerable people to experience or be exposed to the risk of exploitative practises. Logicalis 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.

**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 2021 and ending 28th February 2022. The statement also relates to its following subsidiaries:

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

Leopoldo Dal Bianco
Company Secretary
Logicalis Group Limited
Date: May 2022