

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.

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

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.

9. 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.

10. 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 Bailkoski

Director

Logicalis International Group Holding Limited

Date: 12 May 2026


2026-03-01 Modern Slavery Statement - FINAL

Final Audit Report

2026-05-12

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