

## LOGICALIS UK LIMITED

### STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

#### Introduction

Logicalis UK 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 UK Limited is a subsidiary of Logicalis International Limited (itself a subsidiary of Logicalis Group Limited) and its ultimate parent company is Datatec Limited, a company incorporated in South Africa and listed on the JSE Limited, Johannesburg, South Africa.

We 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 our 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"). ([RBACodeofConduct8.0\\_English.pdf \(responsiblebusiness.org\)](#))

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, gender identity or expression, 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. We expect our suppliers to cascade these standards down their own supply chains. The Logicalis Code of Conduct includes whistleblowing procedures for reporting potential breaches, including modern slavery concerns.

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 Logicalis ARCC (Audit, Risk and Compliance Committee) along with the remedial actions undertaken.

In addition, the Logicalis Group Social and Ethics Committee continues to monitor the activities of the Group in areas such as social and economic development, good corporate citizenship, labour and employment, and the environment, health and public safety.

#### Environmental, Social & Governance (ESG)

Logicalis Group has a dedicated ESG function to oversee the Group's performance on a range of ethics & sustainability issues, including human rights. The ESG team, in conjunction with other business areas around the Group, participates in a number of global ethics and sustainability initiatives, which includes detailed responses to human rights-related and ethics questions.

#### Supply chains

Our business involves sourcing and implementing digital infrastructure and services for our customers. Our supply chain is extensive and global, primarily comprising:

- **Tier 1 Suppliers:** Major global manufacturers and distributors of IT hardware (e.g., servers, networking equipment, components) and software.
- **Service Providers:** Sub-contractors and partners who provide specialised technical services, logistics, and professional support.
- **Business Services:** Suppliers of indirect services such as facilities management, marketing, and professional advisory services.

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.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we integrate modern slavery considerations into our standard supplier contracts with all new suppliers to comply with our Code of Conduct.

### **Risk and compliance**

We 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 that have adopted their own anti-slavery policies and procedures.

### **Remediation and transparency**

We take all reported breaches of our Code of Conduct seriously. Depending on the severity, corrective actions may include corrective action plans, additional training for suppliers, or termination of the business relationship. We are committed to transparency and will report on our performance in future statements.

### **Training**

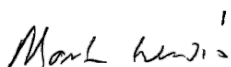
All of our employees are required to complete an interactive online training course annually on our Code of Conduct, and to pass a test to show that they have understood the Code. In addition, there is global training on “ESG Fundamentals”, which covers a variety of areas including human rights and ethics. 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**

We continually take 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. 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.

### **Signature**

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Logicalis UK Limited's slavery and human trafficking statement for the financial year commencing 1<sup>st</sup> March 2024 and ending 29<sup>th</sup> February 2025.



### **Mark Lewis**

Finance and Operations Director

Logicalis UK Limited

Date: 23<sup>rd</sup> June 2025