

## DATATEC PLC

### STATEMENT UNDER SECTION 54 OF THE UNITED KINGDOM'S MODERN SLAVERY ACT 2015

#### Introduction

Datatec Plc 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. Through three core divisions, the Group offers Integration and Managed Services (Logicalis International and Logicalis Latin America) and Technology Distribution and Financial Services (Westcon International).

Datatec Plc 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

Datatec Plc is a subsidiary of Datatec Limited, a company incorporated in South Africa and listed on the JSE Limited, Johannesburg, South Africa.

Datatec 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") ([www.eiccoalition.org/standards/code-of-conduct/](http://www.eiccoalition.org/standards/code-of-conduct/)).

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 the Datatec Code of Conduct which applies across the Datatec 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 Datatec Code of Conduct includes whistleblowing procedures.

Regular reporting of any breaches of the Code of Conduct is completed by the Group, including any non-compliance with modern slavery legislative requirements. Any breaches reported will be advised to the Datatec Audit, Risk Compliance Committee and the Social & Ethics Committee, along with the remedial actions undertaken.

The Datatec Social & Ethics Committee monitors the activities of the Group in areas such as social and economic development. Good corporate citizenship, labour and employment, and the environment, healthy and public safety.

### **Measures**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships, as well as to implementing controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our commitment to combating modern slavery, child labour and human trafficking, we have a number of measures in place to ensure that we are conducting business in an ethical and transparent manner. These include:

- A Group Code of Conduct which requires ethical dealing with suppliers and customers, as well as a zero-tolerance approach to slavery, child labour and human trafficking;
- The Group operates an independent hotline which allows any violations of this statement or Code of Conduct to be reported anonymously; no colleague will suffer any retaliation by the company due to a report being made; our hotline is regularly monitored;
- As part of our vendor onboarding process, we ensure that new vendors with which we do business are operating legally and ethically – this includes adherence to our Code of Conduct which incorporates commitments related to modern slavery and child labour;
- As part of our contracting process for vendors, we require them to confirm compliance with the Code of Conduct, as well as agreeing to specific prohibitions against the use of
- forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

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

The Group has a dedicated ESG function to oversee the Group's performance on a range of ethics & sustainability issues, including human rights. Our programme is run in co-ordination with our three core divisions. 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**

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 onboarding of new suppliers, accordingly, our affiliates are to consider compliance with international laws (including modern slavery) in their appraisal of suppliers.

### **Risk and compliance**

The Group regularly 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 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.

**Remediation**

In the event slavery, human trafficking or child labour is suspected or discovered in any part of our supply chain, the relevant vendor manager, Head of ESG and if required, our Compliance and Legal will open discussions with the affected vendor so that a remediation plan can be created.

**Training**

All of our employees are required to complete annually a training course based on our Code of Conduct, and to show that they have understood the Code of Conduct. In addition, there is training on “ESG Fundamentals”, which covers a variety of areas including human rights and ethics. The training courses encourage employees to identify and report any potential breaches of our policies and gives details of our independent whistleblowing hotline.

**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 the Group’s slavery and human trafficking statement. The statement will be reviewed annually and has been approved by the Datatec Group Board of Directors and signed by the Group CEO.

**JP Montanana**  
**Chief Executive Officer**  
**August 2023**