

DATATEC PLC

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

Introduction

Datatec Plc recognises that modern slavery and human trafficking can occur in many sectors and geographies and can have severe, wide-ranging and long-lasting impacts on individuals and communities. We are committed to preventing acts of modern slavery and human trafficking in our operations and across our supply chains, and expect our suppliers and business partners to uphold the same standards.

Organisational structure and supply chains

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

Datatec Limited and its subsidiaries (the "Group") work with a range of suppliers which include: i) Tier 1 suppliers (manufacturers and distributors of IT hardware and software); ii) subcontractors and partners; and iii) business services suppliers 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.

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 (UN Principles) and the Responsible Business Alliance (RBA) 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, 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 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. We expect our suppliers to cascade these standards down their own supply chains. The Datatec Code of Conduct includes whistleblowing procedures for reporting potential breaches, including modern slavery concerns.

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 are reported to Datatec Audit, Risk Compliance Committee and the Datatec Social & Ethics Committee, with remediation 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.

Supply Chains

The Datatec Group is involved in 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 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.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, our Group integrates modern slavery considerations into our supplier onboarding process, and all affiliates are required to ensure that supplier contracts with 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.

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 whistleblowing hotline whereby any violations of this statement or our Code of Conduct can be reported anonymously; no colleague will suffer any retaliation by the company due to a report being made; our hotline is regularly monitored;
- 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);
- Risk-based engagement with suppliers (for example, targeted questionnaires and periodic reviews) focusing on labour practices, recruitment fees, worker welfare, and subcontracting controls;
- Leveraging industry initiatives supplier programmes (including those of key technology manufacturers and distributors) where relevant to improve supply chain visibility beyond Tier 1; and

- Escalation processes where potential issues are identified, including working with suppliers on corrective action plans.

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.

Monitoring and evaluation

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 Tier 1 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. We seek to monitor and evaluate the effectiveness of our approach and to improve it year-on-year.

Remediation and speaking up

We take all reported concerns seriously. Should slavery risks or indicators be 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 for suppliers, or (where the issue is severe and remediation is not achievable) suspension or termination of the business relationship.

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 conduct audits on smaller suppliers in the Tier 1 supply chain. The Group is 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 the Group's slavery and human trafficking statement. The statement relates to the Group and is for the financial year ending 28 February 2026.

SP Morris
Company Secretary,
For and on behalf of Datatec PLC
September 2026