

# Computacenter PLC Modern slavery statement 2023

We are committed to ethical, responsible, and sustainable corporate management and continue our commitment to upholding the internationally proclaimed human rights of all people in all our business interactions. This means we expect all our suppliers to take actions to ensure that their practices support and protect individual human rights.

We are against all forms of modern slavery, human trafficking, bonded and forced or compulsory labour and believe these practices have no place in society.

We are committed to making certain that we are not complicit in any human rights violations and require our suppliers and partners to adhere to this same high standard.

This statement fulfils the requirements of Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and covers the period of 1 January 2023 to 31 December 2023. This statement outlines the steps taken by Computacenter PLC and all its subsidiaries to prevent modern slavery and human trafficking in its supply chain.



# OUR ORGANISATION, ITS BUSINESS AND ITS SUPPLY CHAINS

## Building long-term value based on trust

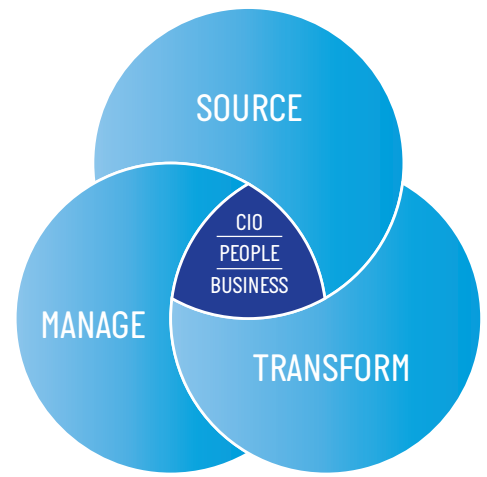
### Who we are

We are a leading independent technology and services provider, trusted by large corporate and public sector organisations. We are a responsible business that believes in winning together for our people and our planet.

Computacenter is one of the world’s six largest Value-Added Resellers (VAR) of Information Technology. We are also a major international IT services company.

### What we do

We help our customers to Source, Transform and Manage their technology infrastructure to deliver digital transformation, enabling people and their business.



### Our Purpose

Helping our customers change the world

Our customers are some of the world’s greatest organisations, in both the corporate and public sectors. They make world-changing decisions and investments and, while we do not change the world ourselves, we enable success for our customers so that they can realise the transformative benefits of information technology for their organisations, people, and the world. We work hard to get to know our customers, understand their needs and put them at the heart of everything we do.

Our business is diversified across our main territories and our three business areas. These business areas are distinct, but synergistic, as customers increasingly look to buy end-to-end services and solutions, including consulting, product supply, life cycle services, integration and managed services.



Computacenter is headquartered in the UK, within the Computacenter group, we have over 20,000 people based across Europe, North America, Mexico, South Africa, and Asia Pacific.  
We have developed a global coverage to mirror our customer's requirements.

**We Source, Transform and Manage technology for our customers in over 70 countries worldwide**

**We sell to customers in eight countries**

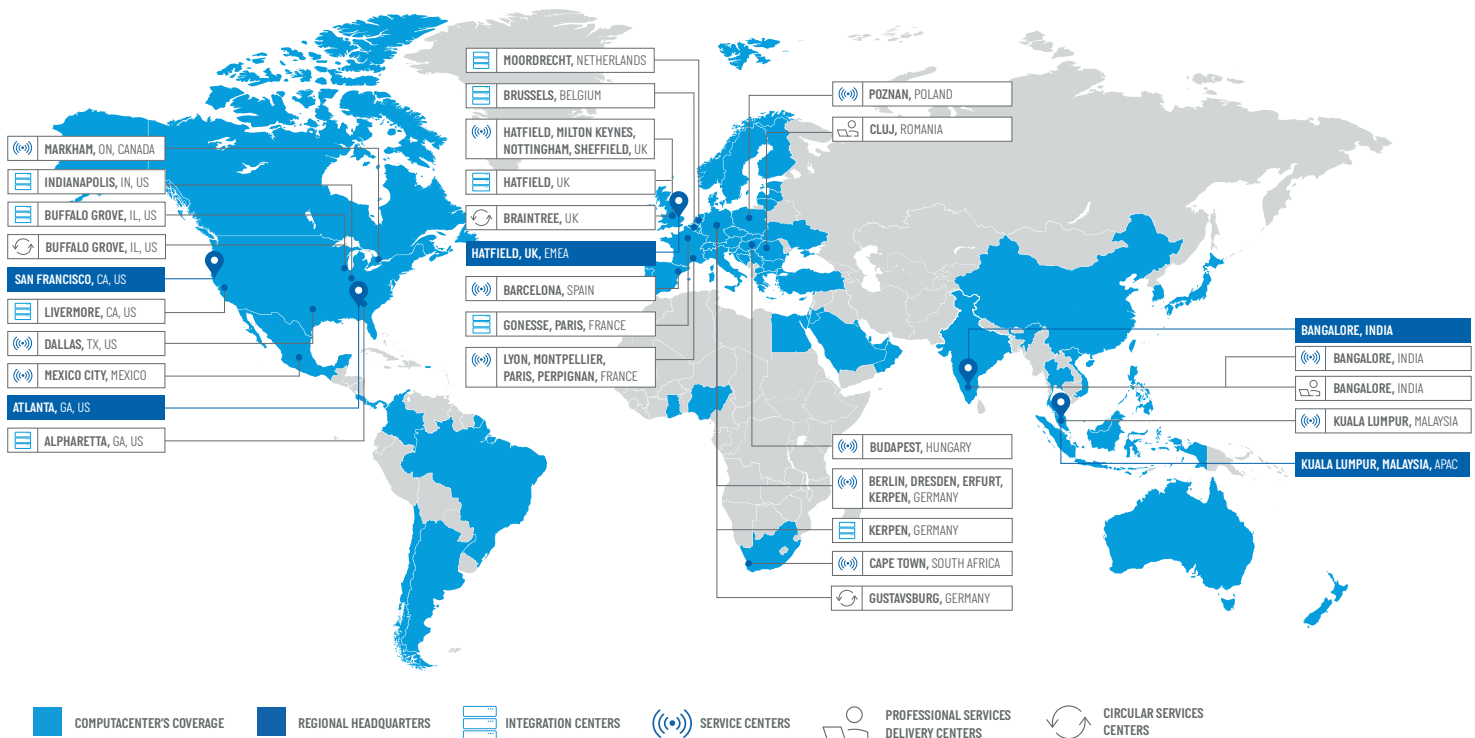
Belgium	Netherlands
Canada	Switzerland
France	United Kingdom
Germany	United States

**We have nearshore and offshore operations in another eight countries**

Hungary	Poland
India	Romania
Malaysia	South Africa
Mexico	Spain

**We have support operations in another seven countries/territories**

Australia	Ireland
Brazil	Japan
China	Singapore
Hong Kong [SAR]	



Our extensive partner network covers field services and onsite support globally and services Computacenter's European and US headquartered customers.

Our supply chain is made up of products and services that we use in our business; our employees; contractors; partner organisations who we work with; and IT equipment which we supply to our customers.

For Computacenter, human rights fall into two areas: protecting the rights of our employees and ensuring we are not complicit in human rights abuses in our supply chain.

To ensure that we continue to operate in alignment with our company values and sustainability goals; we believe it is necessary to ensure that our supply chain is similarly aligned and is operating in a lawful and responsible manner.



## OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Our commitment to human rights means we have adopted the principles of the leading international standards and conventions across our business dealings, in particular the UN Global Compact (signatories since 2007), the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Conventions on Rights of the Child, and fundamental conventions of the International Labour Organization (ILO) and understand our responsibility to respect and support human rights.

The human rights of our employees are covered by our people policies and compliance with local labour laws and fair labour practices wherever we do business. This includes our Health and Safety, Equality and Respect at work policies, our disciplinary and grievance processes and terms and conditions of employment.

Our Group Ethics policy sets out our commitment to observing the highest ethical standards in our business conduct, including the protection of human rights.

Our Group Speak Up (whistleblowing) policy explains how our people and anyone in our supply chain can report any concerns they may have through the external, independent reporting service, provided by Safecall.

An overview and the details of Safecall are publicised internally on our compliance portal, in our Group Ethics policy, through an annual multi-channel communications campaign and are included in all our compliance training. Those within our supply chain are informed of Safecall and the requirement to report any concerns they may have via our Supplier Code of Conduct. Our Group Speak Up (whistleblowing) policy is also published on our company website to ensure that it is easily accessible to anyone within our supply chain.

Any concerns raised are fully investigated, with oversight from the Group Legal and Compliance Director and Chief People Officer. As part of our wider processes around managing reports at a high level, an anonymous summary of each report is reviewed by our Audit Committee, and if necessary, by the Computacenter Board of Directors.

In 2023, there were no issues raised within the company that related to modern slavery or human trafficking amongst our people or in our supply chain.

We also have a comprehensive Anti-Bribery and Corruption policy, and Supplier Code of Conduct.

As part of our supplier onboarding, all potential suppliers in our core countries are provided with our Supplier Code of Conduct which clearly lays out our requirements within both the modern slavery and wider compliance environment and sets out related standards of how they are expected to conduct themselves within their business operations. As part of the Code of Conduct, suppliers are required to notify Computacenter of any breach of these standards and to take appropriate steps to remedy them.

Any breaches of the requirements of our Code of Conduct are considered by us to be very serious and could lead to us terminating relationships with a supplier, where we feel this is appropriate in order to protect ourselves and our customers.

We also have a policy statement published on our company website that outlines our approach to our responsibilities under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz [LkSG]).

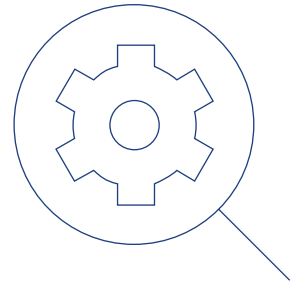


## OUR DUE DILIGENCE PROCESSES

We have continued to evolve our third-party due diligence system since its implementation in 2022. The system enables us to collate comprehensive vendor information prior to their inclusion within our supply chain, alongside a requirement to adhere to our Supplier Code of Conduct. Issues arising are referred to Group Compliance.

A key focus in 2023 was adapting these processes to incorporate the requirements of the LkSG. We also continued to strengthen our due diligence through in-life checks and re-attestation of our Supplier Code of Conduct with current suppliers, and the planned implementation of the tool to our remaining countries in 2024.

The system enables us to carry out appropriate due diligence on vendors in our supply chain through our Group Technology Supplier Advisory and Monitoring Team and our Services Partnering team in core countries. One of the areas covered in the due diligence conducted focuses on human rights and modern slavery-related risk. This information is reviewed annually to ensure that it remains acceptable. The outcome of the due diligence directly correlates to the risk profile associated with a supplier and the resulting actions that we put into place to safeguard against modern slavery occurring within our supply chain.



## OUR RISK ASSESSMENT AND MANAGEMENT

Due to the nature of our business, operations, and practices, we consider ourselves to be a low-risk enterprise as regards the potential for modern slavery or trafficking.

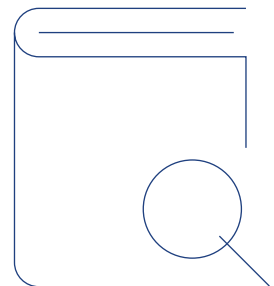
Our risk assessment is based on the purchasing category of goods and services that the supplier is categorised in and an overall country risk analysis, based on a comprehensive Human Rights Country Risk Database.

Having undertaken a thorough internal review and audit of our global HR practices and policies we are satisfied that we are operating in compliance with all labour law and fair labour practices across our global employing entities. We therefore believe that there is an extremely low risk of modern slavery amongst our own employees.

Most of our suppliers are categorised as low risk in terms of exposure to modern slavery. Certain suppliers due to the country and industry they operate in are deemed higher risk, based on internationally understood risks and reliable sources.

Although the electronics and manufacturing industry are high risk sectors for modern slavery, we do not manufacture hardware, and therefore believe this to be a moderate area of risk for us. When we purchase hardware from original equipment manufacturers (OEM's), we work with companies that have a comprehensive approach to the prevention of modern slavery and other human rights violations. Through our Partner Management relationships, we are satisfied that there is appropriate governance and oversight of these suppliers to reduce the risk within our supply chain.

Where we believe we interact with higher risk suppliers or operate in countries that are at a higher risk of modern slavery occurring, we have proportionate actions and governance in place to mitigate the risk of this occurring within our supply chain. This includes our corporate standard terms of contract and supply, including the right to audit and attestation to our Supplier Code of Conduct as previously mentioned.



## KEY PERFORMANCE INDICATORS

We continue to review our policies, practices and how we identify any risks of modern slavery and other human rights on a rolling basis as part of our continued commitment to ethical and responsible business practices. Group Internal Audit regularly tests compliance with our policies.

We will continue with our commitment to ethical and responsible business practices, ensuring that if modern slavery is identified anywhere within our supply chain, we will not tolerate it.

Group Ethics Policy, Supplier Code of Conduct and Speak Up (whistleblowing) policy review completed a minimum of once every two years	<b>100%</b>
% of employees that have completed 'Combatting Modern Slavery' e-learning in 2023	<b>91%</b>
% of employees that have completed 'Ethical Workplace Conduct' e-learning in 2023	<b>89%</b>
% of employees that have completed 'Anti-Bribery and Corruption' e-learning in 2023	<b>86%</b>
Number of reports or investigations into allegations of Modern Slavery or Human Rights concerns in 2023	<b>0%</b>
Number of Suppliers terminated due to Modern Slavery or Human Rights concerns in 2023	<b>0</b>

## INCREASING AWARENESS AND TRAINING ON MODERN SLAVERY

We continue to provide our people with e-learning on 'Combatting Modern Slavery,' 'Ethical Business Conduct' and 'Anti-bribery and Corruption'. These programmes support our people in developing their understanding of these critical areas and provides guidance to them on ethical behaviours and subject specific red flags to look for. All our compliance e-learning contain a dedicated module on whistleblowing, ensuring that our people know where and when to report any concerns that they may have as well as the details of the independent external hotline being publicised internally through an annual multi-channel communications campaign.

As in previous years, key members of our Compliance, Group Legal, Group HR, Group Technology Sourcing and In Country Sales teams have developed further awareness and understanding of modern slavery.

Making an effective contribution in this area is entirely the right thing to do for wider society and for our business and we will continue with our commitment to ethical and responsible business practices, ensuring that we do not tolerate modern slavery anywhere within our supply chain.

This statement was approved by the Board of Directors of Computacenter PLC on 18 March 2024 and has been published on our company website in accordance with the requirements of the Modern Slavery Act 2015.



Mike Norris  
Chief Executive Officer