# MODERN SLAVERY STATEMENT 2022



Computacenter is a people-centric company that depends on its employees to deliver real value to its customers. We have a well-established culture, developed over 40 years from the beliefs and strong direction of our founders and leaders.

### **Our Winning Together Values**

These are the values on which we built this company and they are the values on which we will continue to grow Computacenter.

#### We win by

#### **Putting customers first**

We work hard to get to know our customers, understand their needs and put them at the heart of everything we do. This lets us use our skills and experience to help them in the right way at the right time.

#### **Keeping promises**

We're straightforward, open and honest in all of our dealings. We're pragmatic and do our very best to keep our promises. When that's difficult, we help our customers find other ways to solve their problems.



#### We do it together by

#### **Understanding people matter**

We're committed to being diverse and inclusive. We build supportive, rewarding relationships and celebrate success. We're proud of the people we work with and we treat people as we expect them to treat us.

#### Considering the long term

We're building a sustainable and efficient business for the long term. This leads our decisions and actions and helps people trust us

Our Winning Together Values are at the heart of our business. Conducting ourselves in accordance with our values means that we always strive to observe high ethical standards in the execution of our business activities and we require the same high standards of our supply chain.

We are dedicated to ethical, responsible, and sustainable corporate management and continue in our commitment to upholding the internationally proclaimed human rights of all people in all our business interactions and relationships.

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.



# OUR ORGANISATION, ITS BUSINESS AND ITS SUPPLY CHAINS

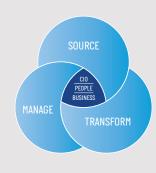
We are a leading independent technology partner trusted by large corporate and public sector organisations around the world. We Source, Transform and Manage our customers technology infrastructure to deliver digital transformation, enabling their users and their businesses.



#### **Our Ambitions**

- Our customers will strongly recommend us.
- We'll be the preferred route to market for technology vendors.
- · People will want to join us, stay with us and grow with us.
- We'll be a trusted, agile and innovative provider of technology and services across the world.

#### Who we are and what we do



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.

We help our customers to source, transform and manage their technology infrastructure to deliver digital transformation, enabling people and their business.

### **Strategic Priorities**



#### **CUSTOMER RELATIONSHIPS**

Retain and maximise the relationships with our target market of large corporate and public sector customers over the long term.



#### **CUSTOMER VALUE**

Build unrivalled value for our target market customers by combining our service and product capabilities.



#### SERVICES GROWTH

Lead with and grow our Services.



#### **PRODUCTIVITY**

Improve our productivity and enhance our competitiveness by leveraging our scale and building efficiencies.

Our business is diversified across our main territories and our three business areas. These businesses are distinct, but synergistic, as customers increasingly look to buy end-to-end services and solutions, ranging from consulting to integration over the product's supply life cycle, to contracting a managed service.



Our global coverage has been developed to mirror our worldwide customer service requirements. 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.

### Market leading international coverage

We have the best international capability of any VAR in the world. This allows us to help customers to deploy and support IT standards consistently worldwide.

# We SOURCE, TRANSFORM and MANAGE technology for our customers in over 70 countries worldwide

## We sell to customers in eight countries

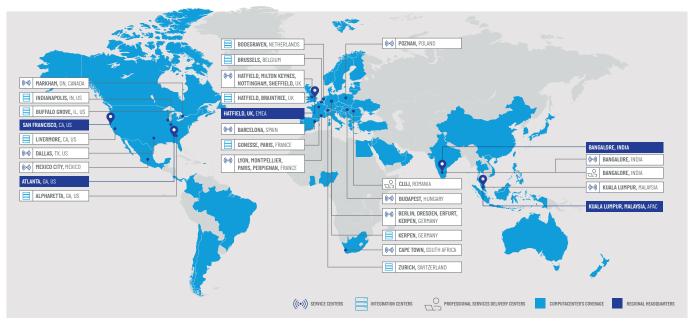
Belgium | Canada | France Germany | Netherlands Switzerland | United Kingdom United States

# We have near-shore and off-shore operations in another eight countries

Hungary | India | Malaysia Mexico | Poland | Romania South Africa | Spain

# We have support operations in another seven countries/territories

Australia | Brazil | China Hong Kong (SAR) | Ireland Japan | Singapore



Our extensive partner network covers field services and onsite support and globally 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 and contractors; partner organisations who we work with; and IT equipment which we supply to our customers.

For Computacenter, human rights falls 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 can continue to operate in alignment with our 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.

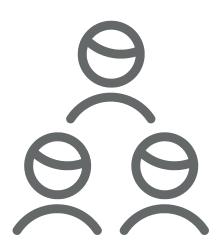
The human rights of our employees are covered by our people policies and compliance with local labour laws wherever we do business. This includes our Health and Safety, Respect and Equality at work policies, and our disciplinary and grievances processes.

Our Group Ethics policy sets out our commitment to observing the highest ethical standards in our business conduct.

Our Group Speak Up (whistleblowing) policy explains how our people can report any concerns they may have through our externally provided, independent hotline. This is also published on our Company website and is included in our Supplier Code of Conduct, to enable the reporting of any suspected modern slavery, or other human rights issues within our supply chains. Any concerns raised are fully investigated, with oversight from the Director of Group Legal and Compliance and Chief People Officer.

As part of our wider processes around managing reports at a high level, an annonymous summary of each report is reviewed by our Audit Committee, and if necessary by the Computacenter Board of Directors.

In 2022, there were no issues raised that related to modern slavery or human trafficking amongst our people or in our supply chain.



As part of our supplier onboarding, all potential suppliers are required to adhere to 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.

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.



### **OUR DUE DILIGENCE PROCESS**

During 2022 we progressed with the implementation of a market leading third-party due dilligence tool within our core countries. This will enhance our risk assessment and management processes by allowing us to more accurately and efficiently assess our commercial counter parties and the level of risk that they pose in this area.

In our North American business, all suppliers and partners are assessed through an equivalent system. The next stages in advancing our due diligence is to have one Group tool fully operational across all of our territories in the Computacenter Group. Our approach will be further strengthened by accompanying this due diligence at contract award with enhanced in-life checks and re-attestation of our Supplier Code of Conduct on a regular basis through the Group tool. Progress commenced in this area in 2022 with a focus on our largest vendor partners.



Our due dilligence system will enable us to carry out appropriate due diligence on vendors in our supply chain through our Group Technology Supplier Contract Management 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 due diligence is reviewed annually to ensure that it is still appropriate. The outcome of the due diligence directly correlates to the risk profile associated with a supplier and the resulting actions that we put in place to safeguard against modern slavery occurring within our supply chain.

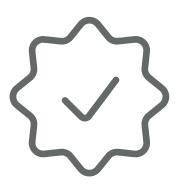
# OUR RISK ASSESSMENT AND MANAGEMENT

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.

Following our partnership in 2021 with an external organisation where we conducted a risk analysis within our supply chain to establish a process for better identifying risk within certain sectors and countries, we have been focusing on how we are able to develop this further and have built in appropriate processes for identifying and integrating higher risk areas based upon agreed criteria within the Group tool.

This risk assessment was based on the purchasing category of goods and services that the supplier was categorised in and an overall country risk analysis, based on a comprehensive Human Rights Country Risk Database. During 2023 we plan to review our risk assessment to ensure that it remains appropriate.

Most of our suppliers are categorised as being at low risk of modern slavery. The suppliers that we would consider as higher risk are those where the country they operate in and industry that those services are purchased from are overall deemed to be at a higher risk of modern slavery based on internationally understood risks and reliable sources.



Overall, the highest risk of modern slavery within our supply chain exists from the organisations that supply labour in these higher risk countries. However, this remains an overall low risk as most people engaged with us are skilled professionals, rather than low skilled, low paid migrant roles where the risk of modern slavery would be significantly higher.

Where we believe we operate in countries or industries 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.



STATEMENT

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.

## **KEY PERFORMANCE INDICATORS**

- Review of Group Ethics Policy, Supplier Code of Conduct and Speak Up (whistleblowing policy) completed as a minimum
  once every two years: 100%.
- 67% of employees (over 13,500) have completed the new 'Combatting Modern Slavery' e-learning in 2022.
   Our target for 2023 is for all eligible employees to have completed the training.
- We have had no reports or investigations into allegations of modern slavery within our supply chain in 2022.

### **INCREASING AWARENESS AND TRAINING**

As committed in our 2021 statement, we successfully went live across the Computacenter Group with our new e-learning on 'Combatting Modern Slavery'. Shortly after the release of this training we launched additional e-learning to all of our employees on 'Ethical Workplace Conduct'.

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. This has been achieved in several ways, including self-teaching, participation in round-table networking events, conferences and learning events.

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 fulfils the requirements of Section 54 (Transparency in supply chains) of the Modern Slavery Act 2015 and covers the period of 1 January 2022 to 31 December 2022.

Approved by and signed on behalf of the Computacenter PLC Board of Directors.



Chief Executive Officer 16 March 2023

