

# GROUP ETHICS POLICY

## Who does this policy apply to?

This policy applies to all permanent and temporary employees and to external staff like contractors and consultants working for any of the Computacenter group of companies (referred to as Computacenter in the text).

It is your responsibility to ensure you have read and understand this policy and those related to it. As the policy will be updated from time to time, please ensure that you review it on a regular basis as the latest published version will supersede any previous versions.

This policy should be read in conjunction with the following policies and guidance:

- Group Anti-Bribery and Corruption Policy
- Group Anti-Fraud Policy
- Group Speak Up Policy
- Guidance Document for Managers: Speak Up (Whistleblowing)
- Group Policy on Foreign Trade Control (Export & Import)
- Money Laundering Policy
- Competition Law Policy
- Intellectual Property Policy
- Data Classification and Handling Policy
- Group Data Protection Policy
- Social Media Policy
- Business & IT-Change Policy

As a user with access to Computacenter intranet, please consult [One CC Compliance here](#) when you are looking for current versions of compliance related policies. Otherwise request up-to-date copies from your manager or key contact within Computacenter.

This policy is without prejudice to procedures that may be required by local law. If this policy conflicts with any applicable local legislation, the applicable legislation shall prevail.

## Why do we have this policy?

Computacenter are committed to observing high ethical standards in the conduct of its business activities and are dedicated to responsible and sustainable corporate management (see Appendix 1: 'The 10 principles of the United Nations Global Compact'). These ethical standards mean we will comply with all laws that apply to the business activities of Computacenter within individual countries, across Europe and the world.

Reputational rating of a business by their partners, customers and public authorities relates increasingly to trustworthiness and sustainability, based upon regulatory compliance and responsible and ethical business practices. Consequently, compliance and business ethics are key enablers as we strive to grow our business in our chosen markets helping us to gain and sustain business.

This policy explains what we expect from employees and others we do business with and the way we conduct our business and act and behave as individuals. It also explains how you can speak-up about



any concerns you may have so that these can be addressed in a way that helps us all achieve our policy goals.

## What happens if I don't follow the policy?

Breaching this policy could lead to disciplinary action<sup>1</sup> (up to and including dismissal). In severe cases it can also lead to significant business losses, both financially and reputationally, to Computacenter Group and if the breach constitutes a criminal act, in the very worst cases, criminal prosecution leading to imprisonment or a fine.

## What we expect from you

### Individual behaviour and conduct:

- Our Values
- Protecting our Corporate Information and Data
- Our Rules about Drugs, Alcohol and Medication
- Our Rules about Smoking

### Speaking Up:

- Public Interest
- Raising concerns

### Working with others:

- Choosing the Companies we work with
- Our Customers, Suppliers, Contractors and Third Parties
- Working with the Government
- Our Wider Community and the Environment

### Protecting our Company:

- Avoiding Conflicts of Interest
- Insider Trading
- Intellectual Property
- Company Property
- Crisis Management
- Political Activities
- Preventing Money Laundering
- Preventing Tax Evasion
- Preventing Bribery and Corruption
- Compliance with Competition Laws
- International and local Trade Laws

### Implementation and compliance with this policy:

- Actively participate

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<sup>1</sup> Possible sanctions as permitted under current employment legislation and applicable employment related regulations.



# WHAT WE EXPECT FROM YOU

## INDIVIDUAL BEHAVIOUR AND CONDUCT

### Our values

How we run our business is important. As well as our 'winning together' values we also need you to make sure that you:

- Treat everyone with respect and dignity
- Recruit people and select suppliers and partners on merit only
- Are open and honest in all business relationships
- Act with integrity and professionalism
- Meet Computacenter's legal obligations
- Work in Computacenter's best interest
- Act in an environmentally responsible way

This means that we won't accept:

- Bullying, harassment, or discrimination
- Risking damage to our reputation (please also read our Social Media Policy)
- Unlawful behaviour
- Dishonesty
- Working with anyone (suppliers, contractors, third parties) who carries out unethical practices

With this policy, Computacenter has established rules of its own relating to ethical behaviour that are binding upon all its employees, agents, contractors, and consultants with regard to the tasks and activities carried out. Our efforts are guided by the following principles:

- We are honest, forthright, fair, and trustworthy in all of our activities and contacts.
- We avoid conflict between private and professional interests.
- We maintain a positive work atmosphere in which all employees treat one another with mutual respect and dignity.
- The leadership and role-model functions required of Computacenter's management is set-out in the 'Group Management Charter' (see Appendix 2).
- We comply with industrial, health and safety and environmental standards in accordance with the relevant laws and regulations that apply to our business.
- At all levels, we seek to ensure that excellent standards are promoted, recognised, appreciated, and practised by all employees.
- As an inclusive employer, we are equally respectful of all employees, customers, and business partners, regardless of race or ethnic origin, gender, gender reassignment, religion or belief, disability, age, sexual orientation, marital status, or caste.

### Protecting our Corporate Information and Data

Computacenter is committed to protecting personal and other business-relevant data. It is important that you make sure the information you come across in your job is kept safe and private and that you know how to dispose of it properly. This commitment extends to trade and business secrets as well.



All employees have an obligation to maintain data confidentiality at an appropriate level. They must make sure that any processing or usage of corporate information and of personal data is done in accordance with applicable data protection and privacy policies including the Data Classification and Handling Policy, which sets out how certain categories of data should be used and protected.

Employees must take particular care to protect information that can be used to identify individuals, as well as all other sensitive data, from inappropriate disclosure and unauthorised access by third parties. In case of doubt, you can contact your Data Protection Officer, or the Data Champion appointed to your department. If there is no Data Protection Officer available, you can contact your in-country HR department or Legal department.

If you are responsible for applications, systems or other activities that involve the processing of any personal data, you are responsible for carrying out such processing in accordance with Computacenter's Group Data Protection Policy. In the case of any new processing, you must give notice to and seek authorisation from the in-country Data Protection Officer for in-country processing and the Group Data Protection Officer for Groupwide processing before the processing commences. If you are in any doubt you should contact the in-country Data Protection Officer.

## **Our rules about drugs, alcohol, and medication**

Computacenter has a responsibility to provide safe working conditions for its employees and takes all steps necessary to make sure that employees' activities are not adversely affected under the influence of alcohol, drugs, or medication.

Each manager must take appropriate measures if he or she has reason to believe that an employee may have a dependency upon alcohol, drugs, or medication. All employees must make sure that their own performance is not impaired due to alcohol, drugs, or medication.

Moderate consumption of alcohol in Computacenter premises or those of a customer or business partner is only allowed in exceptional circumstances. For example, this could include a team celebration, project completion, organised Computacenter staff event or when a customer or business partner invites you to or approves moderate consumption of alcohol on special occasions. If you are unclear on when this may be, please speak to your manager. Be aware that you remain responsible for your actions after consuming alcohol.

Consumption or possession of illegal drugs on Computacenter premises or on those of a client or business partner is strictly prohibited. Computacenter would encourage anyone who is concerned they are dependent on drugs, alcohol, or medication to seek professional medical advice.<sup>2</sup>

## **Our rules about smoking**

All offices and lounges must be kept smoke and e-cigarette vape free at all times. Separately marked smoking areas are provided for employees, visitors, business partners and customers.

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<sup>2</sup> For the Netherlands: The employer has the possibility to send an employee home if there is a well-founded suspicion that he or she is under the influence or wants to have his or her use assessed because it seems to influence his or her work. Follow-up steps will then be formulated in cooperation with the company doctor.



## SPEAKING UP (WHISTLEBLOWING)

We want you to speak up and tell us if you have a concern over any activity by Computacenter or its employees or representatives that is in breach of this policy or relates to any wrongdoing by Computacenter or its employees particularly relating to the following:

- Criminal offences
- Bribery and corruption
- Breaking the law through wrong-doing, or omission to comply with legal duties
- Miscarriage of justice
- Danger to Health and Safety
- Damage to the environment
- Deliberately hiding information about any of the above.

### Raising concerns

The earlier you raise a concern, the easier it is for us to take action. You don't need to have firm evidence before you tell us, but you'll need to explain what's happened to cause you to be worried about a situation and if you have any thoughts on how we can resolve it.

Employees are strongly encouraged to report any violation of this, or any other Computacenter policy, via the independent, confidential reporting hotline provided by Safecall. You can use the hotline completely anonymously, partly anonymously or you can provide your details. A partly anonymous report enables follow up questions if required, as Safecall retain your details but these are not passed to Computacenter. The complete list of telephone numbers available to report a concern to Safecall can be found in appendix 3.

You can also report any violation either to a manager, the Group Legal and Compliance Director, the Group Chief People Officer, or the Group Compliance Manager. Once a concern has been reported the person approached has an obligation to treat any information received and the identity of the whistleblower in a confidential manner.

The person who it was raised with will then make sure that an independent and impartial review of the matter is conducted without delay, taking all measures necessary to resolve or correct the matter, making sure that all concerns are taken seriously. This assumes that the report is as specific as possible, that the persons and institutions involved are named and that the dealings in question are described as precisely as possible.

As a manager you have a responsibility to report concerns in accordance with the Group Speak Up policy. Please refer to the Speak Up Guidance for Managers document published on the Compliance Site.

Any violations, or suspected violations, of this policy may be reported anonymously in writing to the appropriate person in-country (as explained above).

Any suspected criminal activity must be reported to the appropriate person in country in writing (as explained above) or by any other suitable communication channel.

If your concern is about your employment with Computacenter, you can speak to either a manager of your choice or a member of your in-country HR team who will be able to explain how you can raise this concern. If you work for a third-party organisation you will need to contact them.

Further information can be found in the Group Speak Up Policy.



## WORKING WITH OTHERS

We need to make sure that all our working relationships are professional, open, and honest. This includes anyone (e.g., colleagues, customers, and suppliers) you have business dealings with.

On a general level, you must treat everyone with respect and dignity. Suppliers includes vendors, manufacturers, cooperation partners, service providers, consultants, joint-venture partners, and any other entity providing goods or services to Computacenter.

### Choosing the Companies we work with

Companies we work with are selected on the basis of open competition. Our Group policy on anti-bribery and corruption contains important rules that are a precondition to the award of contracts to third parties.

### Our Customers, Suppliers, Contractors and Third Parties (anyone representing Computacenter)

There are also some specific criteria that apply for how we select our business partners, and you'll need to check if any of these apply:

- The business partner has a high level of performance capability that ensures that Computacenter can meet or exceed customer expectations in terms of quality, service, cost, and delivery.
- The business partner complies with its own statutory and regulatory obligations and does not place Computacenter in breach of any of Computacenter's statutory or regulatory obligations.
- The business partner agrees to comply with the principles set out in this Group Ethics Policy on an ongoing basis.
- Remuneration and payment arrangements are agreed in such a way as not to contribute to corruption, money laundering or other illegal behaviour.
- In order to minimise risks associated with the use of business partners, the following should be reviewed:
  - The business partner should agree in writing to observe the 10 principles of the UN Global Compact (see Appendix 2), and to take appropriate measures in support of these principles.
  - The background, experience and reputation of the business partner should align with the principles of this policy and be at an appropriately high level to be associated with Computacenter (expertise, skills, references, no known violations of privacy protections, corruption or other behaviour that would be in violation of this policy).
  - Appropriate measures have been taken to monitor the business partner's activities. These regulations must be observed throughout all divisions by all employees selecting or commissioning a business partner.
- If you are working with any contractors or third parties representing Computacenter (e.g., consultants, agents, sales representatives, or contractors) it's your responsibility to make sure that they follow any relevant Computacenter policy. If we find any of our policies have been broken, we could decide to end their contract.



## Working with the Government

You need to check if there are any special rules you need to follow when working with government bodies, as there are certain laws that only apply in this situation (e.g., they often have stricter rules on hospitality). If you have any concerns or questions regarding compliance with this policy when working with the government or government representatives, please contact the Group Compliance Manager or the Head of Legal in your country.

## Our Wider Community and the Environment

We want people who work with us to be environmentally responsible.

This could mean making sure you use our recycling facilities or shut down computers at night. It also means that we make sure we meet all the environmental legislation, regulations, and requirements we have to.

Computacenter is committed to compliance with all applicable laws, regulations and other provisions relating to industrial, health and safety and environmental protection.

Employees must take all necessary measures to ensure compliance with such provisions and must report all incidents that could lead to a violation of the laws, regulations and other provisions concerning workplace safety or environmental protection to the specialist for industrial safety and or to the Health, Safety and Environment Manager / Protection Officer. These people are also available to provide clarification or to respond to further inquiries.





# PROTECTING OUR COMPANY

## Avoiding Conflicts of Interest

### What is a conflict of interest?

This is where there's a possibility that your loyalty is torn between work and personal interests.

You need to always think about how anything you do at work (and outside of work) could lead to bad publicity for Computacenter (this is known as bringing us into disrepute).

### What happens if I'm in a relationship (or related) to someone I work with or for?

If employees are in a relationship or are related to their direct manager, the next-higher manager must ensure that all decisions concerning promotions, privileges, benefits, remuneration, disciplinary matters, and complaints relating to this employee are taken by an independent manager. This prevents any possible preferential or detrimental treatment taking place or being perceived to have taken place.

If any employee is in a relationship with, or is related to, another employee in the company (whether as a direct report, at the same level or as the next-higher manager) or to a supplier or a client, this employee shall take all necessary steps to avoid or put an end to any conflict of interest arising and protect the interests of the company.

### Can I have a second job?

If you want to take a second job, you'll need to inform your manager. You will also have to commit to it not being a job or activity that might result in competing, whether entirely or partly, with the activities of Computacenter. This may be either by working for a competitor or for one of its suppliers as this might impact the interests of the Company and could impact your work within Computacenter.

### Is there anything else I need to do?

You'll need to tell us if there are any changes to your secondary employment. Also, it's up to you to deal with any tax implications as a result of your second job.

If you're going to be a Non-Executive Director (NED) in another company you'll need to be able to deal with everything this involves, as well as making sure that there's no conflict with your duties to Computacenter.

Please refer to any specific rules in your contract or local country policies regarding other rules around this (i.e., rules relating to the of working time someone can do). If you are in any doubt regarding your obligations, please ask your line manager or HR Representative.

### Is there anything else I need to tell you about?

If you drive a company car and are convicted with an offence that means you lose your driving licence, you must tell us about this.





## Insider Trading

Insider trading is when you use confidential information that you only have because of your job for your own advantage in buying and selling shares (information such as being awarded or losing contracts, profits warnings due to be released etc.).

You are responsible for making sure you understand what this means in your job and with the information you have access to. Listed companies are subject not only to stock-market requirements but also to the requirements of law in relation to insider trading with listed shares. Insider trading is prohibited and illegal.

Employees are permitted to trade in shares of Computacenter stock for personal investment purposes only. The special restrictions applicable in this case must be observed (these are available from the Company Secretarial department if required).

## Intellectual Property

Intellectual property and industrial property rights include, among other things, rights of copyright, trademarks and service marks, patent rights, utility model rights and design rights.

Computacenter justifies, protects, maintains, and defends these rights to all commercially significant intellectual property rights. Therefore, employees must inform the Group Legal Department if they discover or suspect that third parties are infringing upon these rights held by Computacenter. Employees and contractors should also contact the Group Legal Department if they believe they have created any intellectual property in the course of working for Computacenter so we may consider registering this.

Computacenter respects intellectual property and the intellectual property rights of others. Unauthorised use of intellectual property and of the industrial property rights of third parties is a violation of this policy. The Group Legal Department should be consulted in case of doubt or questions.

## Company Property

Computacenter provides its employees with the necessary equipment and facilities for the performance of their official activities. Employees must ensure that all property of the company and of the company's business partners and customers, is properly used, maintained, and secured. This means that employees must take appropriate steps to prevent damage, misuse, loss, or theft of company property.

## Crisis Management

### What happens if there's a major incident at work?

If there's a major incident, such as a terrorist attack or fire, we may need you to work from somewhere other than your normal location and outside of your normal working hours. Any additional work resulting from the incident should be shared out across the team as fairly as possible and will be recorded and paid appropriately in line with your contract of employment. Please see our Business Continuity Plan for more details.

## Political Activities and Donations

You're not allowed to make or accept any political contributions on behalf of Computacenter. This includes political parties, committees, office holders and candidates for any Government office.



## Preventing Money Laundering and Fraud

In the conduct of business, Computacenter does not tolerate any form of criminal activity whatsoever (corruption, bribery, money laundering, etc.).

All employees whose responsibilities include payment activities must ensure that Computacenter does not become involved in money-laundering or fraudulent activities. For this purpose, it is important that you pay attention to the following 'warning signals':

- Cash payments.
- Payments through a third party (except for clearing offices).
- Payments stemming from countries that are known for high-risk payment transactions.
- Transactions that do not harmonise with a customer's business or activities.
- Customers or business partners that do not adequately identify themselves and/or that fail to provide an address.

In all cases, all transactions in which an employee has reason to believe that an offence has taken place must be reported to the Group Legal and Compliance department or via the independent, confidential reporting hotline provided by Safecall.

## Preventing Tax Evasion

Computacenter has a zero-tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country. Computacenter's employees or contractors must not undertake any transactions which:

- (a) cause the Company to commit a tax evasion offence; or
- (b) facilitate a tax evasion offence by a third party.

We adopt our values in all of our third-party relationships and do not engage in activities of tax evasion. Nobody should cause the company to commit an offence of tax evasion or facilitate or collude with a third party to avoid paying tax that is properly due. At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

## Preventing Bribery and Corruption

All Computacenter employees are obliged to read and comply with the 'Code of Conduct' (Appendix 4) and the Group Anti-Bribery and Corruption policy.

The Golden Rules to Anti-Bribery and Corruption and the Group Anti-Bribery and Corruption policy provide you with clarification regarding Computacenter's strategy to combat bribery and corruption and among other things, govern the behaviour of Computacenter and its employees and representatives intended to prevent corruption including the following topics:

- Prohibited actions
- Provision of gifts, entertainment, and meals
- Cooperation with public officials and staff in the public sector
- Charitable donations
- Marketing and sponsoring
- Lobbying for, donations to and activities on behalf of political parties
- Defence of the company by suitable methods



- Use of third parties and completion of appropriate due diligence

## Compliance with competition laws

Computacenter is committed to the rules of fair competition. Employees involved in competitive activities must ensure that all relevant competition laws are complied with and employees shall not permit third party organisations to influence the prices we choose to charge to our customers, the markets we choose to compete in or customers that we wish to supply to. The Group Legal and Compliance Department must be consulted in connection with business agreements that may conflict with the laws that govern competition.

## International Trade Compliance

As an international organisation that imports and exports goods and services, Computacenter is subject to a number of strict regulations relating to the type of goods and services that may be imported and exported. This includes certain embargoed individuals and countries in respect of which export is prohibited and restrictions on certain types of goods.

Computacenter takes all organisational and personnel measures necessary in connection with transactions with certain countries, products and individuals that may be restricted due to embargoes, 'blacklists' or so-called 'terrorist lists', dual-use merchandise and end use subject to approval or resale to third parties.

Guidance from Computacenter's Trade Compliance Department or Group Legal and Compliance must be taken in advance for any matters relating to such cross-border supply of goods and services as may be covered under national, European, or other supra-national foreign-trade law. Adherence to Computacenter's Group Trade Compliance policy is compulsory in relation to any cross-border transactions falling within its remit.



## IMPLEMENTATION AND COMPLIANCE WITH THIS POLICY

We expect all our employees to be compliant with this policy, to actively participate in its implementation and to raise possible violations.

As a matter of principle any person who notifies us of a breach, with reasonable belief that it is true, must not fear reprisals even if the report should prove to be unfounded.

Every manager is obliged to ensure a workplace culture of integrity by:

- notifying employees of Computacenter policies (or guidelines) and procedures;
- acting as a role model by setting an example for others through their own behaviour;
- encouraging employees to voice any compliance or integrity issues;
- promptly raising any compliance and integrity issues themselves.

It is important that you are familiar with the main provisions of all Computacenter policies and guidelines.

To make sure that you don't put yourself in a position where you could be breaching the rules and policies the following can be used to help you self-check whether you need to tell us something.

1. If what I'm doing (or know about) was published in a newspaper, would it be bad for Computacenter?
2. Does what I'm doing (or know about) affect anyone I work with?
3. Do I think anyone else has done something that breaks national or international laws?
4. Do I feel I should let someone know?

If the answer to any of these is yes, you need to let a manager, Head of in-country Legal Department, Compliance Manager or someone on your in-country HR team know or use the Group Speak Up process above and telephone numbers set out in Appendix 3.



## APPENDIX 1: THE 10 PRINCIPLES OF THE UN GLOBAL COMPACT

The principles of the Global Compact are based on a worldwide consensus deriving from

- the Universal Declaration of Human Rights,
- the International Labour Organization's Declaration on Fundamental Principles and Rights at Work,
- the Rio Declaration on Environment and Development and
- the United Nations Convention Against Corruption.

The Global Compact calls upon companies, acting within their sphere of influence, to recognise, support and implement a catalogue of fundamental values in the areas of human rights, labour standards, environmental protection, and anti-corruption:

### Human rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights and
- Principle 2: make sure that they are not complicit in human rights abuses.

### Labour standards

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining and, furthermore, to
- Principle 4: the elimination of all forms of forced and compulsory labour,
- Principle 5: the effective abolition of child labour and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

### Environmental protection

- Principle 7: Businesses should support a precautionary approach to environmental challenges,
- Principle 8: undertake initiatives to promote greater environmental responsibility and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

The measures and the stages of progress towards implementation of these principles at Computacenter are documented and updated in our annual Communication of Progress that is published on the UNGC website.



## APPENDIX 2: GROUP MANAGEMENT CHARTER

We promote the high-performance culture of Computacenter by:

- looking after our employees and recognising what is important to them,
- strengthening our employees, empowering them to achieve the objectives that have been set,
- recognising and systematically enlisting the diverse talents in our team,
- promoting our employees in accordance with the requirements of Computacenter,
- accompanying each individual employee in his or her individual development, in order to make the most of his or her potential,
- establishing a working environment of trust in which creativity and innovation flourish,
- recognising and valuing good performance,
- helping each individual employee implement his or her personal development plans,
- involving our teams in decision-making and encouraging them to provide constructive feedback,
- incorporating the Computacenter journey into our everyday work, with our vision, our values and the overriding corporate goals,
- identifying performance gaps and promptly and effectively to deal with these.

We exercise our leadership and role-model functions by:

- acting as ambassadors for Computacenter and encouraging our employees to do the same,
- acting in accordance with the interests of the entire Computacenter Group and encouraging our employees to do the same,
- developing clear expectations of others and articulating comprehensible objectives,
- regularly providing clear and balanced feedback and encouraging others to do the same,
- being aware of our capacity as role models and always leading by example,
- earning respect through our work and not expecting it as an automatic by-product of a job title,
- creating an environment of mutual trust and esteem through open and honest communication,
- taking responsibility for our own actions and calling for responsible actions on the part of our employees,
- making the corporate strategy known and demonstrating how, working with our teams, we contribute to achieving corporate objectives.

We contribute towards consolidation of best practices by:

- availing ourselves of standard tools for use in the management of our employees,
- assessing our employees' performance in meetings held on an annual basis,
- always reviewing workflows and dedicating ourselves to improvements,
- taking guidelines, procedures and practices to heart and adapting our actions to changes,
- conducting team and individual meetings on a regular basis,
- recognising and respecting the individuality of each employee,
- asking our colleagues to provide feedback in order to constantly improve the quality of the leadership we provide.



## APPENDIX 3: TELEPHONE NUMBERS FOR CONTACT TO THE INDEPENDENT, EXTERNAL REPORTING HOTLINE “SAFECALL”

Country	Telephone number (all free of charge)
Belgium	00 800 72332255
Canada	1877 599 8073
China	China Unicom / Netcom 10 800 7440605
China	China Telecom 10 800 4400682
France	00 800 72332255
Germany	00 800 72332255
Hungary	00 800 72332255
India	000 800 4401256
Ireland	1800 812 740
Malaysia	1800 220 054
Mexico	800 1231758
Netherlands	00 800 72332255
Poland	00 800 72332255
Romania	0372 741 942
South Africa	0800 990243
Spain	00 800 72332255
Switzerland	00 800 72332255
United Kingdom	0800 9151571
USA	1866 901 3295
Australia	1 800 312 928
Singapore	800 448 1773
Japan	0120 921 067
Hong Kong	3077 5524





## APPENDIX 4: COMPUTACENTER ANTI-BRIBERY AND CORRUPTION CODE OF CONDUCT

Computacenter is committed to compliance with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act 2010 and other similar legislation across our geographical footprint. For the avoidance of doubt, this includes all such legislation applicable to our business wherever we operate. Since 2007, we have visibly committed to adhere to the 10 core principles of the United Nations Global Compact, where the tenth principle specifically commits us to preventing all forms of corruption, including extortion and bribery. It has always been Computacenter's policy not to tolerate any dishonest behaviour since it is part of our culture that Computacenter wants to carry out its business fairly, honestly, and transparently. This is the primary reason for this Code of Conduct and accordingly, we:

- will not make bribes, nor will we condone the offering of bribes on our behalf, in an attempt to try and gain business or personal benefit, or in an attempt to motivate another to act improperly;
- will not accept bribes, nor will we agree to them being accepted on our behalf;
- will avoid doing business with others who may harm our reputation by not respecting these values;
- will set out our processes for avoiding bribery, directly or indirectly (see the Group Anti-Bribery and Corruption Policy);
- will recognise that certain donations, hospitality, and gifts, either given or received, may be considered inappropriate in certain instances and we will all apply our minds to ensure that our motives remain to carry out our business fairly, honestly, and transparently (see the Group Anti-Bribery and Corruption Policy);
- will make sure that everyone in our business, including our business partners and major suppliers know about our principles and we will require all relevant staff to commit to this Code of Conduct and the related Policies (see the Group Anti-Bribery and Corruption Policy);
- will regularly review our Code of Conduct and related Policies, followed by further communication to all relevant staff, major suppliers, and partners;
- will ensure that there are communication channels for all employees, contractors, partners, and suppliers to report instances of suspected dishonest behaviour (see the Group Anti-Bribery and Corruption Policy, and the Group Speak Up Policy);
- will maintain clear and accurate records of all reports and investigations regarding suspected dishonest behaviour; and
- will deal appropriately with potential and actual conflicts of interest when they arise (see the Group Ethics Policy).

Mike Norris

Group CEO – July 2021