

# Group Speak Up Policy

Raising concerns at work; Computacenter's Speak Up (Whistleblowing) Policy

## Who does this policy apply to?

Everyone working with Computacenter or any subsidiary company of this Group; this includes all employees and temporary workers employed through a third party and its strategic partners ("Computacenter"). The reporting process within this policy is also open to anyone working with Computacenter as part of our supply chain.

This policy will be updated from time to time, so please ensure that if you are an employee you refer to the [OneCC Compliance pages\\*](#), or for non-employees, refer to [Computacenter's corporate website](#) to make sure you are accessing the current versions of this policy.

If you are a manager or hold a senior position, you have an obligation to understand what the risks could be within your area of operation and to take immediate action if you believe there is a risk to Computacenter. This means it's essential that you know what your reporting obligations are if you are approached with a report directly.

This means all managers and those in a senior position need to familiarise themselves with this policy and the "Guidance for Managers" document that provides helpful advice and supports you in meeting your obligations when a concern is raised with you directly.

## Why do we have this policy?

Our customers and our people trust in us to be an ethical, compliant, and sustainable organisation. Computacenter is committed to observing high ethical standards in the conduct of its business activities and complying with the laws that apply across our countries of operation.

We believe it's important for you to speak up about any concerns you have at work. This is known as whistleblowing. This policy explains what to do if you have a concern or you suspect something you've seen or heard about is unsafe, unethical, unlawful, or not in line with our company policies and/or the interests of others or of Computacenter itself (or anything else that you reasonably believe would be in the public interest).

We understand that you may feel worried about raising a concern, but rest assured, it's safe for you to speak up without the fear of retaliation. We will ensure that any reporting details are kept in strictest confidence and that you are able to report any concerns anonymously.

## What's meant by 'Public Interest'?

This is where the interests of others or of Computacenter itself are at risk, such as:

- Criminal offences
- Bribery and corruption
- Breaking the law

- Miscarriage of justice
- Danger to health and safety
- Damage to the environment
- Deliberately hiding information about any of the above.

## Raising Concerns

You have an obligation to speak up if you have any suspicions of inappropriate conduct so that it can be investigated as soon as possible. Don't wait until something goes wrong before acting. There will be no negative consequences for any concerns raised with reasonable belief and made in good faith even if they turn out to be unfounded.

The earlier you raise a concern, the easier it is for us to act. 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 have a concern about a situation, and if you have any thoughts on how we can resolve the issue.

Whichever way you raise a concern, whether it's by telling your line manager, informing another appropriate contact in the Computacenter Group, or through Safecall's external and confidential whistleblowing hotline you can be sure that your concerns will be taken seriously.

Any person who raises a concern will not be subject to any detriment, retaliation, discrimination, or other adverse consequences. Retaliation against any individual for raising a legitimate concern is not tolerated by Computacenter. Such retaliation is an extremely serious breach of both company policy and law and may lead to action under local disciplinary policies or / and labour laws up to and including dismissal.

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 a concern.

## Third-Party Reporting line: Safecall

Our people are strongly encouraged to report any concerns around potential violation of any Computacenter policy to the independent, confidential hotline supplied by Safecall.

Safecall provides an independent, confidential reporting line where you can raise your concerns. Calls are handled by skilled staff and treated in complete confidence.

Once a report has been raised, this is passed to the Director of Group Legal and Compliance and the Chief People Officer to establish the right course of investigation. If the report relates to either of these, then the report is instead passed to the Company Secretary.

The regional leads of compliance may be included in an investigation, providing the report does not relate to their area of responsibility. All reports are treated on a strictly confidential, need to know basis.

You can contact Safecall 24 hours a day, seven days a week. The phone number to call is dependent on the country you're calling from.

Safecall can also be contacted by email on [computacenter@safecall.co.uk](mailto:computacenter@safecall.co.uk) or via the web at [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

Country	Telephone Number (all free of charge)
Australia	1 800 312 928
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
Hong Kong	3077 5524
Hungary	00 800 72332255
India	000 800 4401256
Ireland	1800 812 740
Japan	0120 921 067
Malaysia	1800 220 054
Mexico	800 1231758
Netherlands	00 800 72332255
Poland	00 800 72332255
Romania	0372 741 942
Singapore	800 448 1773
South Africa	0800 990243
Spain	00 800 72332255
Switzerland	00 800 72332255
UK	0800 9151571
USA	1866 901 3295

If you are contacting Safecall from a country not listed above, you can find a full list of the phone numbers by country on the following link: [Telephone Numbers \(safecall.co.uk\)](http://www.safecall.co.uk/TelephoneNumbers)

## What happens if I raise a concern?

Once a concern has been raised (whether via Safecall or another means) the individual receiving the report or made aware of the allegations (in cases where it is not directly raised to Safecall) has an obligation to treat any information received and the identity of the reporting person in complete confidence.

If the report is not received in the first instance via Safecall, the person who is made aware of the allegations should log it with Safecall or report it directly to the Group Legal and Compliance Director or the Chief People Officer. The concern should not be discussed with anybody outside of this to ensure that confidentiality is maintained.

In receipt of a report, the Director of Group Legal and Compliance or Chief People Officer will 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.

In the event that a report relates to suspected criminal activity information will be reported to the local authorities, as appropriate.

## Will I find out what happens if I raise a concern?

We'll let you know where possible the progress of any investigation, but this may not always be possible because of the confidentiality required for each concern reported.

\*For our people based in China or Hong Kong this Policy and supporting documents will be provided to you via an email communication. You can also request a copy from your Line Manager