

COMPUTACENTER GROUP

# SUPPLIER CODE OF CONDUCT



# 1. Introduction to our Supplier Code of Conduct

## 1.1 Who we are

Computacenter is a leading independent technology partner trusted by large corporate and public sector organisations around the world. As a reseller of IT products and provider of IT solutions and services around the globe we source, transform, and manage our customers' technology infrastructure to deliver digital transformation, enabling their users and their businesses worldwide. In this Code of Conduct ["Code"], when we refer to "Computacenter" or "Computacenter Group" or "us/we", we mean Computacenter plc and any of its subsidiary organisations.

## 1.2 Our Values - Winning Together

Computacenter is a people-centric company that depends on its employees to deliver real value to its customers. Our Winning Together Values are at the heart of how we operate as a business and our approach to sustainability and business activities is driven by them and comprise the following. 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.

## 1.3 Sustainability

In order to deliver against our values, we must adopt sustainable practices and have organised our sustainability strategy into three areas:

### PEOPLE

Supporting our people and communities through positive social impact.

### PLANET

Taking a responsible approach to ensuring sustainable operations, from supply chain to our environment, direct and indirect.

### SOLUTIONS

Helping our customers meet their sustainability goals through creative and efficient service operations.

## 1.4 Our Partners/Suppliers

We work with suppliers and partners to our business across all major markets and are aware that there can be challenges with setting global ethical standards across multiple countries. 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 Supplier Code of Conduct sets out a number of minimum standards that we require of our supply chain that are founded mainly in law and underpinned, amongst other things by:

- the UN Declaration of Human Rights and other global treaties and the legislation of a number of key territories including the US, UK, and EU; and
- a general desire to behave responsibly and decently towards stakeholders – whether customers, suppliers, employees, or the world at large.

Taken together, these set minimum standards that we would always expect our suppliers to meet in addition to compliance with all of the laws that apply to their business activities internationally within the individual countries across the world where they operate.

### 1.5 Who does this policy apply to?

This policy applies to any business, company, organisation, partner, person, or other entity that contracts with any Computacenter company to supply goods or services (“Supplier”). By signing any such contract, the Supplier automatically confirms its acceptance of the content in this policy.

A Supplier’s contract with Computacenter may contain provisions addressing one or more of the subject areas of this policy. Nothing in this policy is meant to supersede more stringent provisions in any particular contract. Having reviewed our activities globally, we do not consider that we operate in particularly high-risk activities or market sectors however we may in certain circumstances require higher standards than set out in this Code of Conduct and we may discuss this with Suppliers as appropriate.

### 1.6 Consequences of breach

Our requirements as set out in this Code are the minimum that we would ask of our suppliers. Suppliers are expected to notify Computacenter of any breach of these standards in writing as soon as is reasonably possible and in any event within no longer than 2 working days and to promptly take appropriate steps to remedy them. Breaches of the requirements of this Code 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.

### 1.7 “Speaking Up”

Suppliers, their employees, workers or subcontractors should report any concerns or a possible violation of this Code to us at Computacenter.

Supplier’s employees and workers/contractors may contact our external ‘Speak Up’ (whistleblowing) service available 365 days a week 24/7 to report an incident or violation, which you may do anonymously here . We take these reports seriously and will investigate any report received in a timely manner. We will not tolerate any retribution or retaliation taken against any individual who has reported a concern in good faith.

## 2. What we require from our suppliers:

<b>Working with suppliers:</b>	Choosing the suppliers we work with Conflicts of Interest Supplier Due Diligence Supply Chain Control
<b>Compliance with law and regulation:</b>	Human Rights Employment practices and Labour Rights Product Safety, Workplace Health and Safety Environmental Responsibility and Stewardship Data Protection, Confidential Information, and Intellectual Property incl. Product Piracy and Plagiarism Prevention of Corruption, Money Laundering, Fraud and Tax Evasion Gifts and Hospitality Compliance with Competition Laws Conflict Minerals International Trade Controls Land, Forest, and Water Rights, Forced Evictions Use of Private or Public Security Forces
<b>Reporting concerns:</b>	Reporting Concerns

## 3. Working with suppliers

### 3.1 General Requirements

We need to ensure that all our working relationships are professional, open, and honest and adhere to the principles of fair business practices. This includes anyone [e.g., colleagues, customers, and suppliers] that we or any supplier working for us have business dealings with.

How our supply chain behaves is important to us and to our customers. As our Supplier you must:

- Conduct business with Computacenter and other customers in a responsible manner.
- Treat everyone, including your own employees with respect and dignity.
- Be open and honest in all business relationships.
- Act with integrity and always be professional.
- Comply with all laws and regulations that apply to you, and any products or services provided by you.
- Act in good faith and in Computacenter's interests.
- Act in an environmentally responsible way.

In particular, Computacenter will not accept:

- Bullying, harassment, or discrimination.
- Risking damage to our reputation.
- Unlawful behaviour.
- Dishonesty.
- Working with anyone [suppliers, contractors, third parties] who carries out unethical practices.

We apply and require our suppliers to adopt the following principles which are guided by our company values:

- 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 where all are treated with mutual respect.
- We ensure industrial, health and environmental protection in accordance with the relevant regulations and standards.
- We are equally respectful of all employees, customers, and business partners, regardless of race or ethnic origins, gender, gender reassignment, religion or belief, disability, age, sexual orientation, marital status, or caste.

### 3.2 Choosing the companies we work with

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

We expect our own suppliers to behave in a similar manner and require them in particular to comply with all applicable laws, rules, and regulations in the countries in which they operate. We require them to maintain suitable measures to ensure compliance within their own business and in their supply chain with such laws, rules, and legal regulations, including among others all applicable human rights, competition and anti-corruption legislation and good industry practice.

### 3.3 Conflicts of interest

Suppliers must be honest, direct, and truthful when answering questions from Computacenter about the relationship of the supplier or its employees to Computacenter employees. Supplier must avoid any conflict of interest as well as the appearance of any conflict. In particular, a supplier must not deal directly with any Computacenter employee whose spouse, partner, or other family member or relative is employed by or holds a financial interest in such supplier unless this has been first disclosed and approved in writing.

### 3.4 Supplier Due Diligence, Compliance Audits

Based on applicable legislation for supply chain control, Computacenter will conduct due diligence of suppliers both in the initial phase of establishing a contractual relationship, and during the operational supply relationship.

Suppliers are required to accept and cooperate with related activities of Computacenter, including the right to audit the Supplier's compliance with this Policy in an appropriate manner which may include requiring a Supplier to confirm compliance in writing. We expect all our Suppliers to cooperate with any audit, including provision of an appropriate level of documentation which substantiates in a clear and transparent manner the adherence to this Policy.

The Supplier and Computacenter will discuss any questions in relation to this policy in good faith and in a truthful and respectful manner.

### 3.5 Supply Chain Control

Suppliers are required to use best efforts to be familiar with the business practices of their suppliers, sub-contractors, and other business partners and to require all such suppliers, sub-contractors, and business partners to comply with this policy or the values and principles laid down in this policy where this relates to any product or service to be supplied to or on behalf of Computacenter. This requirement should be in writing where the law requires this.

## 4. Compliance with Law and Regulation

### 4.1 Human Rights; including Combating Slavery and Human Trafficking

Computacenter supports and respects internationally recognised human rights of people in all our business interactions and relationships. We are committed to making certain that we are not complicit in any human rights violations and hold our suppliers and partners to this same high standard. This means we expect all our suppliers to take actions to ensure that their practices support and protect individual human rights.

Our commitment to human rights means we have adopted the principles of internationally proclaimed human rights as informed by international standards and conventions across our business dealings, in particular the UN Global Compact, 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 Organisation (ILO), and understand our responsibility to respect and support human rights.

It is therefore a requirement that, as a minimum, all our suppliers:

- Adhere to local and national laws.
- Provide wages, benefits and conditions of work that are just and fair with transparent payment terms and which are sufficient to satisfy the basic needs of workers and their families.
- Prohibit any threat of violence, harassment, and intimidation.
- Prohibit the use of worker-paid recruitment fees or bonded labour.
- Prohibit compulsory overtime.
- Prohibit child labour.
- Prohibit discrimination.
- Prohibit confiscation of workers original identification documents.
- Provide access to remedy, compensation, and justice for victims of modern slavery.
- Ensure that workers are free to terminate their employment.
- Ensure workers have freedom of movement.
- Ensure that working hours comply with national legislation and applicable international guidelines.
- Ensure workers have freedom of association and that the right to collective bargaining is respected.
- Have in place appropriate speaking-up/whistleblowing and grievance procedures and enable employees to communicate openly with management regarding working conditions without fear of reprisals.
- Comply with any applicable "hidden worker" or similar legislation.
- Prohibit the hiring or use of private or public security forces for the protection of the Supplier's activities.

### 4.2 Employment Practices and labour rights

All suppliers must conduct their employment practices in full compliance with all applicable laws and industry good practice that apply to them and should strive to provide decent work for their workers.

### 4.3 Product Safety, Workplace Health and Safety, Environment

We require our suppliers to comply with all applicable product safety, workplace health and safety and environmental legislation and good industry practice and in particular to develop and implement adequate health and safety management practices in all aspects of their business. Suppliers must in particular:

- Be committed to manufacturing and delivering safe products to Computacenter and providing a safe working environment that supports accident prevention and minimises the exposure to health risks of their workers.
- Implement processes to ensure that their workers comply with all applicable occupational health and safety laws and regulations and mandatory standards.
- Provide a safe and healthy work environment for all workers, taking action to minimise the causes of hazards inherent in the working environment.
- Establish and implement business continuity plans that address topics including but not limited to natural disasters, pandemics, workplace incidents, emergencies, and other potential business interruptions.
- Prohibit the use, possession, distribution, or sale of illegal drugs.

### 4.4 Environment Responsibility and Stewardship

Across all the countries and territories where the Computacenter Group operates, we have a commitment to minimising our ecological footprint for our people, planet, and global communities. We are taking tangible steps to measure and mitigate our environmental impact and secure sustainable business practices for the long-term. Our commitment to sustainable operations puts longevity in the driving seat with policies and practices aimed at safeguarding our business, people, and environment against risks, known and emerging.

As such, we require our suppliers to be environmentally responsible and to comply with all applicable environmental legislation and good industry practice. This includes suppliers recognising and understanding their environmental impact within their operations and practices as well as understanding how they can further their efforts in the following:

- Using more recycled products, or products with a high recycled content,
- Improving efficiency in the use of finite or scarce resources [such as energy, water, raw materials].
- Reducing greenhouse gas / climate gas emissions.
- Reducing energy consumption and ensuring energy efficiency.
- Fostering and use of renewable energies.
- Minimising transportation and logistics activity, particularly wasted journeys.
- Reducing travel.
- Reducing waste and ensuring its proper disposal.
- Reducing carbon footprint.
- Protecting biodiversity.
- Minimising other environmental impacts such as noise, water, and ground pollution
- Prohibiting exports of hazardous waste in contravention of law and the Basel Convention.

We further require that suppliers do not engage in or support the unlawful eviction or unlawful taking of land, forests and waters in the acquisition, development, or other use of land. We require our suppliers to report all incidents that could lead to a violation of the laws, regulations and other provisions concerning environmental protection.

#### **4.5 Data Protection, Confidential Information and Intellectual Property**

Computacenter prioritises data protection, safeguarding confidential information and respecting intellectual property rights. As a global technology services company, we recognise the critical role our suppliers play in maintaining the highest standards and this Supplier Code of Conduct sets out our expectations of our suppliers and any subcontractors or third-party entities appointed by our suppliers to data, protection, confidential information and adherence to intellectual property rights including the prohibition of product piracy and plagiarism.

Suppliers will comply with all applicable laws concerning data protection and it is the supplier's responsibility to implement appropriate policies and procedures to ensure personal data is protected and that any confidential business information or trade secrets gained by virtue of the business activities with Computacenter ["Confidential Information"] is held in strict confidence and not improperly used or disclosed to third parties. Computacenter suppliers are responsible for implementing and maintaining appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, or destruction.

Suppliers must respect and uphold the intellectual property rights of Computacenter, including not using, copying, reproducing, or distributing intellectual property without the necessary rights and permissions, respecting software licensing agreements and not engaging in piracy or unauthorised use of software and promptly notifying us of any suspected infringement or misuse of our intellectual property.

#### **4.6. Records Management**

Suppliers must ensure that records are managed in accordance with established records management principles, legal requirements and good industry practice.

- Any information and data processed, transmitted, and processed on behalf of Computacenter or our customers adheres to relevant records management policies and standards.
- Information is anonymised where required.
- Information and data are used only for the purpose intended and are accessible and usable for as long as they are required for Computacenter's business purposes.
- Appropriate processes and policies are in place for the disposal of records.

#### **4.7. Prevention of Corruption, Money Laundering, Fraud and Tax Evasion**

In the conduct of business, Computacenter does not tolerate any form of criminal activity whatsoever (including, but not limited to corruption, bribery, money laundering, fraud, tax evasion, etc.).

All suppliers must ensure that they do not engage in or involve Computacenter in money-laundering activities. Suppliers must conduct business in full compliance with the requirements of all anti-bribery and corruption and anti-money laundering and anti-tax-evasion legislation applicable to the jurisdictions in which suppliers conduct business, together with laws governing lobbying, gifts, and payments to public officials including facilitation payments political campaign contribution laws, and other similar or related regulations.

Suppliers must not, directly or indirectly, promise, authorise, offer, or pay anything of value (including but not limited to gifts, travel, hospitality, charitable donations, or employment) to any employee or representative of Computacenter, government or public official (as defined in applicable legislation) or other party to improperly influence any act or decision of such person for the purpose of promoting the business interests of supplier

or Computacenter in any respect, or to otherwise improperly promote the business interests of supplier or Computacenter in any respect, irrespective of such value, local custom, the tolerance of such payments by local authorities, or the alleged necessity of the payment in order to obtain or retain business or any other advantage. To avoid any doubt, Computacenter does not tolerate the payment of any "facilitation payments" regardless of whether these are permitted in any particular jurisdiction.

We also require Suppliers to report signs of any personnel, representatives, or partners performing unethically or being engaged or suspected of being engaged in bribery or kickbacks.

#### **4.8. Prevention of Money Laundering and Fraud**

Each Supplier must ensure that Computacenter does not become involved in money-laundering or fraudulent activities as a result of or in its interactions with Supplier. 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.
- suppliers or business partners that do not adequately identify themselves and/or that fail to provide an address.

In all cases, Suppliers must report all transactions where there is reason to believe that an offence has taken place to Computacenter's Group Legal and Compliance department and Supplier's employees and workers/contractors may equally report such transactions via the independent, confidential reporting hotline provided by Safecall.

#### **4.9. Anti-Facilitation of Tax Evasion**

Computacenter has a zero-tolerance approach to all forms of tax evasion, whether under UK law or under the applicable laws of any country that Supplier is based or and transacts in. This means that our Suppliers must not undertake any transactions which:

- (a) cause Supplier or Computacenter 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. At all times, business should be conducted in a manner that is open and transparent and prevents any opportunity for tax evasion.

#### **4.10. Gifts and Hospitality**

We require our suppliers to use good judgment when exchanging business courtesies. Gifts, meals, entertainment, hospitality, and trips that are excessive or lack transparency or an obvious legitimate purpose may be seen as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making. Giving business courtesies to Computacenter personnel, if permitted at all, should be modest and infrequent. Suppliers must never give anything to gain an improper business advantage. In particular:

- Suppliers must not offer anything of value to obtain or retain a benefit or advantage for the giver, and do not offer anything that might appear to influence, compromise judgment, or obligate the Computacenter employee.
- Entertainment and meals should be modest, infrequent, and occur in the normal course of business.

#### **4.11. Compliance with competition laws**

Computacenter is committed to the rules of fair competition.

Suppliers will strictly comply with all applicable antitrust and competition laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition and restraints of trade, and relationships with competitors and customers.

Suppliers will not enter into agreements or arrangements with competitors or engage in other acts that may harm competition, including, but not limited to, price fixing or market allocations.

#### **4.12. Conflict Minerals**

Suppliers will ensure they are aware of applicable legal requirements in relation to "conflict minerals" including tin, tantalum, tungsten, their ores, and gold originating from conflict areas and shall ensure compliance with such laws. Additionally, suppliers will take best efforts to avoid the use of raw materials in its products that directly or indirectly finance armed groups violating human rights.

#### 4.13. International Trade Controls

Suppliers will comply with all legislation governing:

- transactions with countries, products and individuals that may be restricted due to embargoes.
- 'blacklists' or so-called 'terrorist lists'.
- dual use merchandise.
- any products or services where end use is subject to approval; and resale to third parties.

Suppliers must ensure that they have adequate and effective measures to ensure that their actions do not put them or Computacenter into a position of non-compliance with such legislation and will proactively highlight to Computacenter any risk or concerns in respect of such legislation and compliance for resolution prior to execution.

#### 4.14. Land, Forest, and Water Rights, Forced Evictions

Computacenter supports the protection of human rights especially when it comes to unlawful eviction and the prohibition of unlawful taking of land, forests and water in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person.

#### 4.15. Use of Private or Public Security Forces

Any Supplier that utilises private or public security forces to protect a project must provide those security forces with human rights training that is deemed acceptable to Computacenter. Suppliers must maintain strict control over their security forces at all times, and must ensure that such forces do not engage in torture, cruel, inhumane or degrading treatment, cause any damage to life or limb, or impair the right of anyone to organise or exercise their rights to freedom of association.

### Document Control

<b>Policy Version</b>	V2.1	<b>Classification</b>	Unrestricted
<b>Approval date</b>	November 2023	<b>Next Review date</b>	November 2024
<b>Owner</b>	Fraser Phillips - Group Legal and Compliance Director		