

Group Policy against Bribery and Corruption

Who does this policy apply to?

This policy applies to all permanent and temporary (internal) employees and to (external) staff like contractors and consultants working for any company of the Computacenter Group (referred to as “Computacenter” in the text).

Also, as this policy isn't part of your contract, we're able to change it if we need to from time to time. New employees shall receive this policy as part of the onboarding process.

What is a Bribe?

A 'bribe' can be any inducement or reward offered, promised or provided in order to make a person act improperly, or to reward them for having done so. It is important to recognise that a bribe can be anything of value, and therefore is not only related to the payment of money. For example, it could include offering gifts, hospitality, entertainment, travel, job offers and advantages for family or friends.

Why do we have this policy?

It has always been Computacenter's policy not to tolerate any dishonest or illegal behaviour, since it is part of our culture that Computacenter wants to carry out its business fairly, honestly, legally and transparently. This includes a zero-tolerance policy with respect to bribery and corruption.

The management and all employees of Computacenter are committed to achieving this objective by abiding by the following rules issued by the Group Legal and Compliance Director.

Prohibition of bribery

Computacenter has a zero-tolerance policy towards bribery and corruption and as such all forms of bribery and corruption are unacceptable and prohibited.

Computacenter group with all its organisational and business units, all its members of staff and anyone acting on behalf of Computacenter (third parties) must not:

- give, promise or offer something as a bribe to public officials¹, customers or partners in the private and public sectors in the course of business;
- solicit or accept bribes (or promises of bribes) from public officials, customers or partners in the private and public sectors in the course of business; or
- make facilitation payments to public officials, customers or partners in the private or public sector or their equivalents (including foreign officials and equivalents).

¹ A Public Official is any individual who:

- holds a legislative, administrative or judicial position of any kind whether appointed or elected; or
- exercises a public function for a country or territory, or any public agency or public enterprise of a country or territory; or
- acts as an official or agent of a public international organisation.

Moreover, they must refrain from threatening behaviour or retaliation against an employee or anyone else who refuses to commit a bribe, or who expresses reservations in this context.

Computacenter will deal with all occurrences in accordance with the U.K. Anti-Bribery Act, the Conventions of the Council of Europe and of the UN Against Corruption, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and other relevant international and national legislation.

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

Gifts, hospitality, donations and similar benefits

Computacenter do not prohibit reasonable and proportionate Gifts, Hospitality and Entertainment being given to and received from third parties. It is not prohibited if:

- it is not done with the intention that it will result in a specific business advantage for Computacenter in obtaining or retaining business;
- it is not done in 'return for a favour';
- it complies with local law in the country in which made;
- it is given in the name of Computacenter, not in the name of any individual;
- it is appropriate in the circumstances and would not cause Computacenter any embarrassment if it was reported in the newspaper;
- considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly and recorded as such on a Gifts, Hospitality and Entertainment register, and not secretly; and
- it complies with the rules of the other company, from where we get or to where we offer a gift or an invitation.

Moreover, when providing gifts, hospitality, entertainment or any other benefit directly or indirectly to a Public Official, the individual providing it must make sure that it complies with the following three 'Public Official Expenditure Requirements':

- it is aimed at nothing more than general relationship building;
- it could not be perceived as an attempt to gain influence in respect of any matter; and
- it complies with all relevant governmental codes.

The following types of Gifts, Hospitality and Entertainment are never acceptable:

- Gifts in the form of cash or cash equivalent vouchers unless vouchers are given directly to the Company (and not an individual), pursuant to a vendor / supplier incentive scheme of Computacenter, approved by a Senior Manager;
- accepting an invitation to a sporting, theatre or concert event where the host or a nominated deputy is not in attendance;
- hospitality or entertainment that is disproportionate compared to the value of the business relationship, and any entertainment of a sexual or similarly inappropriate nature;
- regular provision or receipt of gifts and invitations to or from the same parties i. e. suppliers, customers, and other third parties;
- any donations not approved by the Charity Committee;
- quid-pro-quo barter (in which something other than the agreed remuneration is offered in exchange for a performance).

Prior written approval by a senior manager is required

- before giving or receiving a gift of over £ 125 / € 150 / \$ 165² per head or £ 500 / € 600 / \$ 660 in total, in case of a single event;
- before giving to or receiving from individuals from the same third-party gifts, hospitality or entertainment in any 3-month period with a cumulative value of over £ 650 / € 770 / \$ 850;
- always if gifts, hospitality or entertainment are also provided to friends or family members of the recipient;
- always if the recipient is a public official;
- always during an active bid or supplier due diligence (unless low value, e. g. a cup of coffee or a branded item).

A senior manager is defined as directly reporting into a Group Exec member (a Group Exec member is directly reporting into the CEO).

Gifts and Hospitality Registers

Any giving and receiving of Gifts, Hospitality and Entertainment (except those of low value under £ 35 / € 40 / \$ 45) must be recorded in the Gifts and Hospitality Registers that are maintained by every company belonging to Computacenter group³.

Communication and awareness

Activities are implemented to

- ensure all employees are aware of and understand the Group policy against Bribery and Corruption and are invited to complete the Anti-Bribery and Corruption training available on our online training platform;
- explain how gifts and hospitality is properly recorded on Gifts and Hospitality registers;
- make employees aware that they have to ensure incidents must be reported using the procedure described below if an act of bribery or corruption is contemplated or initiated by a person working for public authorities or business partners.

Preventative controls

Computacenter utilises preventative controls that are adequate to the bribery risk. They may include among others:

- Organisation based controls (as for instance instructions to third parties; filing of anti-bribery compliance commitments; segregation of duties and “four-eyes-principle”; due diligence of suppliers);
- Technology based controls (as for instance limitation of transactional rights and permissions of business roles; restriction to allowed posting and accounting; statistical evaluation of business transactions to detect potential anomalies).

Raising concerns in confidence

All individuals who work for, with or on behalf of Computacenter have a responsibility to help prevent, detect and report instances of bribery and corruption. 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 reporting hotline provided by Safecall. You can use the hotline anonymously, semi-anonymously, or you can provide your details. A semi-anonymous report enables follow up questions, as Safecall retain your details but these are not passed to Computacenter.

² here and in the further: or equivalent in other currencies

³ The full list of legal entities belonging to Group is contained in the **Computacenter plc Annual Report and Accounts**, available on <https://investors.computacenter.com/results-centre>, see section “Investment in subsidiaries” there.

The complete list of telephone numbers available to report a concern to Safecall can be found in the Group Ethics Policy.

Safecall can also be contacted by email on computacenter@safecall.co.uk or via the web at www.safecall.co.uk/report.

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.

If you are a manager you have a responsibility to report any concerns in accordance with the Group Speak Up (Whistleblowing) Policy. Please refer to the Speak Up Guidance for Managers document.

The person who it was raised to 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 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.

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.

Treatment of incidents

Computacenter will ensure that any suspected or committed criminal act or omission of which we become aware is investigated, reported and prosecuted to the requirements of law.

Employees of Computacenter or other persons who act or have acted on behalf of Computacenter should be aware that breaches of the Anti-Bribery and Corruption laws may lead to sanctions, including termination of employment or contract and / or criminal prosecution.

When an allegation or incident of bribery or corruption is reported, Computacenter will coordinate investigation. Following an initial assessment of the allegation or incident the required response activity will be recorded and reported, and any improvement activities that need to be actioned to reduce the risk rating of the activities concerned will be actioned.

Assurance

Independent assurance on the effectiveness of this Group policy against bribery and corruption, and of the applied processes, is provided by the Internal Audit function, based on their audit schedules.

Implementation Guideline

Guidance for the implementation of this policy, including definition of important terms, specification of responsibilities, and detailed instructions, is given in the “Implementation Guideline – Procedures against Bribery and Corruption” document.