

# 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 (hereinafter "Computacenter"); this includes all employees and temporary workers employed through a third party.

As this policy isn't part of your contract, we are able to update it when necessary.

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.

## Why do we have this policy?

Computacenter is committed to observing high ethical standards in the conduct of its business activities. These ethical standards mean we will comply with all of the laws that apply to the business activities of Computacenter within individual countries, across Europe and the world.

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 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 wrongdoings that you have witnessed but rest assured, it's safe for you to speak up without the fear of retaliation.

Computacenter will deal with all occurrences in accordance with the U.K. Public Interest Disclosure Act or the relevant local legislation, including where based on Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, ensuring that the anonymity of the reporting person is protected, and they remain free from reprisals.

Where this policy is in conflict with any local legislation, the local legislation shall prevail.

## 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.

If you are a manager or hold a senior position, it's especially important that you understand what the risks could be. It's essential that you know what your reporting obligations are if you are made aware, see, or hear anything you're concerned about. If we're not made aware of any concerns or wrongdoings, we can't act upon it.

Managers are asked to familiarise themselves with the "Guidance for Managers" document that provides helpful advice and supports you in meeting your obligations when a concern is raised with you directly.

## Raising Concerns

You should speak up if you have any suspicions of inappropriate conduct so this can be investigated as soon as possible. Don't wait until something goes wrong before acting. There will be no negative consequences for you even if your concerns turn out to be unfounded.

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 worry 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 whistleblowing hotline you can be sure that your concerns will be taken seriously. All genuine reports will be investigated, and you will not suffer any detriment or discrimination as a result of making a report.

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. If you work for a third-party organisation you will need to contact them.

## Safecall

Employees are strongly encouraged to report any violation of any Computacenter policy to our independent, confidential hotline, supplied by Safecall.

Safecall provide an independent, confidential reporting line where you can raise your concerns and be assured, they will be fully addressed. Calls are handled by skilled staff and treated in complete confidence. A report of the call will be sent to the Group Legal and Compliance Director or the Group Chief People Officer. Safecall will not disclose your name to us if you wish to remain anonymous.

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).

<b>Country</b>	<b>Telephone Number (all free of charge)</b>
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
UK	0800 9151571
USA	1866 901 3295

### What happens if I raise a concern?

Once a concern has been logged the individual approached has an obligation to treat any information received and the identity of the reporting person in complete confidence.

The individual who received the report will pass the information onto the Group Legal and Compliance Director or the Group Chief People Officer. They 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, 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 suspected criminal activity must be reported to the appropriate person in country in writing (as explained above) or by any other suitable communication channel.

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

Not always. We'll let you know where possible the progress of any investigation, but this isn't always the case because of the confidentiality required for each concern reported.