



Business Partner Code of Conduct Policy

Note to Partner

Dear Valued Partner,

We welcome this opportunity to forge a long-term business relationship with you. Computacenter affiliates and subsidiaries within Computacenter North America and Pivot Shared Services Limited ("Company") is committed to conducting business with fairness, honesty, and integrity, and as such, we strive to build relationships with partners who share those values and reflect them in their business practices.

Our Business Partner Code of Conduct (the "Code") details the expectations that we have of our partners. This Code applies to all of our business partners including but not limited to our manufacturers, distributors, solution and consulting partners, suppliers, vendors, subcontractors, and service providers.

We appreciate your commitment to conducting business in a responsible and ethical manner. If you have questions about the Code, you may contact ComplianceCCNA@computacenter.com.

Sincerely,

Computacenter North America

1 Purpose and Scope

This Business Partner Code of Conduct outlines the expectations that we have of our partners as it relates to their business practices, including their ethics and integrity program, health and safety, human rights policies, among other things.

1.1 Anti-Corruption and Anti-Bribery

We are committed to conducting business free from bribery, extortion, and all unlawful, unethical, or fraudulent activity. Business partners must not offer, give, promise, authorize, or receive any bribe, loan, or inappropriate gift, reward, or advantage to any person, including any government official, customer, Company employee, or supplier to improperly obtain business or improperly influence any action or decision. Business partners must comply with all applicable domestic and international anti-bribery and anti-corruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act of 2010.

1.2 Conflicts of Interest

Business partners must avoid any situation that may involve a conflict or the appearance of a conflict between their personal interests and the interests of the Company. Business partners must not offer or provide inappropriate gifts or excessive hospitality or entertainment to any Company employee, client, or their families to improperly obtain or retain business or to influence a decision. Business partners are required to avoid relationships with Company employees where such employee holds a significant economic interest in the business partner. If a conflict cannot be avoided, the business partner must disclose this to the Company.

1.3 Insider Trading

Business partners must ensure that any non-public information obtained as a result of a relationship with the Company is not used for the personal benefit of the business partner, their employees or other persons.

1.4 Intellectual Property

Business partners may only use the Company's intellectual property, such as trade secret information, copyrights, patents and trademarks, in a manner permitted under their contract with the Company. Business partners may not misappropriate or infringe the intellectual property rights of others and must notify us if they become aware of any unauthorized use of our brands, trademarks or logos by a third party.

1.5 Confidentiality

Business partners must not misuse any trade secrets, proprietary or confidential information of the Company or of others for their own purposes or disclose such information to unauthorized third parties. Such information must only be used for the business of the Company. Business partners must report all data breaches or suspected data breaches affecting the Company's confidential

information immediately. Business partners must comply with applicable privacy and data protection laws, including implementing appropriate safeguards and technical controls.

1.6 Trade Controls and Antitrust

Business partners must strictly comply with all applicable trade laws, including laws that control the import and export of products and information. Business partners must adhere to the laws that restrict dealings with entities and individuals located in countries subject to trade embargoes or economic sanctions. In addition, all business partners must comply with antitrust laws, and compete fairly in every jurisdiction in which they conduct business. Business partners must not propose or enter into any agreement with a competitor to fix prices, margins, terms and conditions or agree to divide up any markets or customers. Business partners are prohibited from proposing or entering into any agreement or understanding which restricts resale pricing.

1.7 Honest and Accurate Dealings

Business partners must not make any false representations in connection with any Company transaction including oral misrepresentations of fact or the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, forged letters of destruction or any other false or inaccurate records.

2 Labor Standards

Business partners are expected to treat their employees fairly in accordance with applicable laws and regulations regarding labor and employment and to pursue the following principles:

2.1 Child Labor, Human Trafficking, and Modern Slavery

Business partners are prohibited from engaging in or supporting the use of slavery, compulsory labor, or child labor including human trafficking; Employment with business partners should be an expression of free choice. Business partners should adopt procedures to verify and maintain documentation that no workers are younger than the local legal age for employment. Business partners must follow all applicable local laws, regulations and standards concerning working hours and conditions for all workers.

2.2 Lawful Employment

Business partners must, prior to employing any worker, validate and review all relevant documentation to ensure that such worker has the legal right to work in that jurisdiction.

2.3 Equal Opportunity, Discrimination, and Harassment

Business partners must not discriminate on the basis of race, color, gender, transgender, gender identity or expression, sexual orientation, age, religion, physical or mental , ancestry, disability, marital status, status as a parent, veteran status, national origin, citizenship, genetic information, political affiliation, religion, or cultural, religious or personal beliefs, or any other basis that has the effect of interfering with an individual's work performance or creating an intimidating, harassing, hostile or offensive working environment.

2.4 Fair Labor and Freedom of Association

Business partners must support freedom of association and respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions.

2.5 Safe Conditions and Working Hours

Business partners must provide a safe and hygienic working environment for workers and fully comply with applicable safety and health laws, including providing appropriate personal protective equipment ("PPE"), regular safety training, and policies and procedures. Also, working hours must comply with applicable laws.

2.6 Wage and Benefits

Business partners must provide wages, benefits and overtime pay that comply with all local wage and hour laws and regulations including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

2.7 Substance Abuse

Business partners are prohibited from being impaired by alcohol or illegal or illicit substances while on Company premises or conducting Company business.

3 Environmental Standards

The Company is committed to respecting the environment and conserving resources. Business partners must comply with applicable laws and regulations relating to the impact of their business on the environment, which includes applicable international or local laws affecting the sourcing of materials and manufacturing processes.

3.1 Waste Management

Business partners should take steps to ensure that waste is minimized and items recycled whenever practicable and to avoid undue and unnecessary use of materials whenever appropriate.

3.2 Conservation and Energy Use

Where applicable, processes and activities should be monitored and modified as necessary to ensure conservation of scarce resources. Business partners should strive to adapt production and delivery processes as well as heating, ventilation, lighting, IT systems and transportation to maximize energy efficiency and minimize harmful emissions.

4 Procedures

4.1 Monitoring and Compliance

We may audit compliance with this policy or appoint a third party to conduct an audit. Any violations will be reported to the business partner's management for their attention and, if appropriate, corrective action, including termination. It is the intention of the Company to terminate its relationship with any business partner who does not comply with this Code or does not commit to a specific plan to achieve compliance.

4.2 Certification

Business partners must have an authorized representative certify that he or she has read and understood the Code and is in compliance.

5 Validity and Document Management

This document is valid as of the last revision date as documented in the footer of this document.

The owner of this document is identified on page 1 and is responsible to review for accuracy at least once a year, and if necessary, update the content and submit for review and approval to the SVP Head of Compliance North America. If no updates are required, it must still be submitted for review and approval.

6 Contacts and Additional Information

For information or questions about this policy contact the Compliance Department at ComplianceCCNA@computacenter.com