

Anti-Bribery and Corruption Procedure Guidance Note: External Communication and Training

Responsibility for implementation

Website (Section 1): Principal Anti-Bribery & Corruption contact in each Computacenter plc subsidiary (“Subsidiary”); and

Third Party Communication and Training (Sections 2 and 3): Business Areas (with assistance from the Human Resources Department to provide access to training for Third Parties where required).

This procedure guidance note relates to the communication by each Computacenter plc subsidiary of its Anti-Bribery and Corruption policies to anybody who provides business services to it (the “Third Party”). For the avoidance of doubt this shall include, amongst others, suppliers, partners, agents, logistics providers and vendors.

Such communication should occur in three ways:

1. The Website of the Subsidiary

- Each Subsidiary should ensure that its external website references the following parts of its compliance programme relating to Anti-Bribery and Corruption:
 - The Anti-Bribery and Corruption Policy;
 - The Dealing with Public Officials Policy;
 - An appropriate ‘zero-tolerance’ statement (the “Zero-Tolerance Statement”);
 - Top-level commitment – usually in the form of the Anti-Bribery and Corruption Code of Conduct from the Group Chief Executive Officer;
 - The Anti-Bribery and Corruption Procedure Guidance Note: Due Diligence on Third Parties; and
 - A clear summary of the Anti-Bribery and Corruption Whistle-blowing Process by which the process for reporting a suspected act of bribery or corruption must be reported (and which should be available for third parties to use).

2. Direct Communication by Computacenter

- An e-mail containing either (i) the Subsidiary’s Anti-Bribery and Corruption Policy or (ii) a direct website link to the Subsidiary’s Anti-Bribery and Corruption Policy should be sent by each Business Area to Third Parties that it engages.
- To the extent that the Third Party operates out of, or is providing Services to Computacenter in, a ‘High-Risk’ jurisdiction (i.e. it has a score that does not exceed 50 on the Transparency International Corruption Perceptions Index, which each business area should provide its members with a copy of and which should be provided on the Subsidiary’s website), then the Third Party should be asked to provide a declaration

(either written or by e-mail) that it has received, read and agrees to abide by the terms of the Subsidiary's Anti-Bribery and Corruption Policy.

- Business Areas should, once in every three year period, send out the communication attached at Appendix A to all Third Parties that it engages to provide business Services for it.
- Appropriate written or e-mail records should be kept by each Business Area of communications made by it, and all declarations received as a result of the terms of this procedure guidance note. These should be made available and provided to the Subsidiary's Anti-Bribery and Corruption contact, or the Group Head of Legal and Contracting or Group Company Secretary, upon request.

3. Training

- Additionally, the Subsidiary's Anti-Bribery and Corruption training must be provided to, and undertaken by:
 - any third party which sells for, or on behalf of, the Subsidiary (a "**Sales Agent**"); and
 - any third party which acts for, or on behalf of, the Subsidiary in assisting it to acquire any licence, visa, permit or other authorisation necessary for it to carry out business in any jurisdiction.

Access to this training for third parties will be provided by the Human Resources Department upon request from Business Areas.

- A record of all Anti-Bribery and Corruption training undertaken by Third Parties should be kept on record by the relevant principal business contact at Computacenter. This should be provided to the Subsidiary's Anti-Bribery and Corruption contact, the Group Head of Legal and Contracting or the Group Company Secretary, upon request.

Appendix 1 – Draft Communication to External Parties

[ON COMPUTACENTER HEADED PAPER]

[Contact]
[Supplier Name]
[Supplier Address]

[Date]

Dear []

As a company listed on the main market of the London Stock Exchange and headquartered in the United Kingdom, Computacenter plc (“Computacenter” or the “Company”) continues to be subject to the application of the UK Bribery Act 2010 (the “Bribery Act”).

Computacenter is committed to ensuring that third party organisations that do business with us or provide services on our behalf shall not conduct any form of bribery or corruption (whether acting as agent for Computacenter or otherwise) and in particular, that they shall not contravene or commit an offence under the Bribery Act.

The Bribery Act prohibits all forms of bribery in a business context, whether in the UK or outside it. Bribery involves the offer or giving of a payment or any benefit which is designed to procure an improper advantage. This includes payments commonly described as facilitation payments, kick-backs, sweeteners and ‘grease payments.’

Computacenter takes its responsibilities under the Bribery Act seriously and we trust that in doing business with us or performing services on our behalf, you take your responsibilities in the same way. As part of our procedures to ensure compliance with the Bribery Act, we are required from time to time to notify third party organisations that do business with us or perform services on our behalf of our zero-tolerance approach to bribery and corruption.

As such, we are notifying you that we continue to expect our business partners to conduct their business ethically and honestly and, in particular, not to pay or receive bribes. If we discover or suspect that any of our business partners has committed bribery, we will take appropriate steps which may include terminating our business relationship with that business partner.

If you require any further information in respect of this letter, please do not hesitate to contact either the Group Head of Legal and Contracting or the Group Company Secretary at Computacenter plc, Hatfield Avenue, Hatfield, Hertfordshire, AL10 9TW.

Yours faithfully

[Computacenter Principal Business Contact]