

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

Responsibility for implementation: Subsidiary Human Resources Department

Internal Communication

- Each of the Anti-Bribery and Corruption Policy, the Anti-Bribery and Corruption Code of Conduct and the Dealing with Public Officials Policy (the “Main AB&C Policies”), once drafted appropriately and translated for the relevant Computacenter plc subsidiary (the “Subsidiary”) to which they apply, must be circulated to *all employees of the Subsidiary* (including those which, for any reason, are based within any third party organisation). This should take place on an annual basis.
- An acknowledgement must be received from all directors, employees, (whether permanent, temporary, casual, part time or on fixed term contracts), agency staff, consultants, contractors, trainees, seconded staff, and interns of the Subsidiary that they have received, read and agreed to abide by the terms of the Main AB&C Policies (the “Declaration”). The Declaration should be received from all employees of the Subsidiary on an annual basis.
- Each new employee of the Subsidiary should, during their induction programme, be required to read each of the Main AB&C Policies and make the Declaration.
- A record of all Declarations made should be kept on record, and provided to the Subsidiary’s Anti-Bribery and Corruption contact, the Group Company Secretary or the Group Head of Legal and Contracting.

Anti-Bribery and Corruption Internal Training

- Anti-Bribery and Corruption training must be provided to, and completed by, any employee of the Subsidiary working in an area deemed to be at ‘High-Risk’ of exposure to any act of Bribery or Corruption. For the avoidance of doubt, this shall include all employees of the Subsidiary that work within the following:
 - (i) sales, (ii) procurement, (iii) cabling, (iv) the public sector, (v) finance, (vi) human resources (vii) international operations (again, including those employees based in third party organisations) and (ix) transport and logistics; and
 - Any employee of the Group’s Malaysian, Indian, South African or Hungarian subsidiaries
- A record of all Anti-Bribery and Corruption training provided, and carried out, should be kept on record, and provided to the Subsidiary’s Anti-Bribery and Corruption contact, the Group Head of Legal and Contracting or the Group Company Secretary, upon request.