

Dealing with Public Officials Policy

Computacenter (UK) Limited

Dealing with Public Officials Policy (the “Policy”)

Associated Policies

This policy should be read in conjunction with the Company’s Anti-Bribery and Corruption Policy and Anti-Bribery and Corruption Code of Conduct.

Why do we have this Policy?

Computacenter (the “Company”) has a ‘Dealing with Public Officials’ Policy to demonstrate its commitment to conducting its business with Public Officials in accordance with applicable laws and regulations in jurisdictions within which it operates and in a way which will maintain and enhance its reputation.

Computacenter strictly prohibits any activity that seeks to bribe, corrupt or otherwise influence a Public Official (as defined in this Policy) in any country (i) to gain a business advantage, or (ii) for that Public Official to act (or omit to act) in a way that differs from that official’s proper duties, obligations and standards of conduct.

Who is a Public Official?

This is an 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 that country or territory; or
- Acts as an official or agent of a public international organisation

Whilst the list set out below is non-exhaustive, the definition of a Public Official will include the following:

- An employee, official or contractor of a government body or state-owned enterprise (e.g. a state-owned bank, state-owned transport company or state-owned hospital etc)
- A person performing the duties of an officer or position created under a law of a country or by the custom or convention of a country
- A person in the service of a government body including a member of the military or the police force
- A politician, judge or member of the legislature of a country
- An employee, contractor or person otherwise in the service of a public international organisation (such as the United Nations)
- An individual who is or who holds himself or herself out to be an authorised intermediary of a Public Official (as defined against the points above)

Who does this Policy apply to?

This Policy applies to all directors, employees (whether permanent, temporary, casual, part time or on fixed term contracts), agency staff, consultants, contractors, trainees, seconded staff, interns, sponsors and agents (third party representatives) who work at or on behalf of the Company, as well as Computacenter's partners, suppliers and vendors, and any other person associated with us, wherever located.

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 entertainment, gifts, travel, job offers and advantages for family or friends.

Prohibited Behaviour

Under this Policy, you (and anyone acting on your behalf) must not:

Bribe a Public Official

We should be particularly aware when dealing with Public Officials (as defined directly above) and ensure that our interactions with such Public Officials do not provide any advantage, incentive or reward for their past, present or future willingness to recommend, purchase, pay for, authorise, approve or supply any product or service or provided by the Company, or to make any other decision which is favourable to the Company.

Make a 'Facilitation Payment'

Computacenter also prohibits facilitation payments being made to Public Officials on its behalf. These will include payments made to any Public Official in any country to expedite or secure the performance of routine governmental action (e.g. to facilitate the expedition of applications for visas, minor licences or permits etc.).

A 'Facilitation payment' includes any payment or advantage (no matter how small) given to a Public Official to encourage the performance of, or to speed up the performance of, an existing duty. For example, this could include 'grease payments' to customs officials to speed up standard import processes or to a Public Official to arrange connection to local utilities such as water, electricity or telephone.

The Company will not tolerate or condone the making of such payments by any employee or any third party acting on its behalf, regardless of its amount. However, the Company will also not jeopardise the safety of its employees and if you consider your personal safety to be threatened as a result of not complying with a request for a Facilitation Payment, the Company will not consider such a payment to be a breach of this Policy. In any such instance, such payments must be recorded and reported to the Group Company Secretary or Group Head of Legal and Contracting within 7 working days of them taking place. If relevant, these may then be reported to local authorities.

How do we apply this Policy?

Computacenter has developed this Policy and its associated procedures in line with applicable laws which specifically prohibit bribery of Public Officials. Computacenter seeks to engage third parties and agents who may act on its behalf only if they are willing to commit to the same principles as set out in this Policy.

Lobbying, Political Donations and Secondments

Any form of Lobbying (the act of attempting to influence decisions made by officials in the government) may only be carried out with the e-mail approval of the Public Sector Director.

Any form of political donation made on behalf of the Company is prohibited, and further detail on this can be found in the Company's Anti-Bribery and Corruption Policy. Attendance at party political conferences may not be made by any employee in any capacity where they are, or may be deemed to be, representing the Company, without the prior approval of the Computacenter plc Board of Directors.

The secondment of any individual from or to the Public Sector should receive prior approval from the Group Company Secretary or the Group Head of Legal and Contracting, prior to that secondment being agreed.

The implementation of appropriate procedures to comply with this Policy will include, amongst other things:

- Increased monitoring of the Gifts and Hospitality registers for those teams who include any individual likely to interact with a Public Official as part of their role with Computacenter; and
- Every third party or intermediary who is authorised to engage with a Public Official on behalf of Computacenter being required to read and acknowledge their understanding of the Company's Anti-Bribery and Corruption Policy, Anti-Bribery and Corruption Code of Conduct and Dealing with Public Officials Policy;

Other Considerations

Public Officials often have their own Code of Conduct relating to acceptance of gifts, entertainment and hospitality. These guidelines generally provide that acceptance of gifts or hospitality will be inappropriate in a range of circumstances, including where the provider of the gift or hospitality is involved in a tender process or is the subject of a decision within the discretionary power or substantial influence of the government employee concerned. However, outside such circumstances, most guidelines do permit some acceptance of hospitality in circumstances where that hospitality may genuinely assist the public organisation in developing and maintaining constructive relationships with its third party providers.

All individuals must comply with the terms of the Company's Anti-Bribery and Corruption Policy in any event. Where the giving or receipt of Gifts, Hospitality or Entertainment is to or from a Public Official, then regardless of its value, it must be approved by e-mail by your line manager, and a Senior Manager who must be a direct or indirect line manager of the person giving or receiving the hospitality. Additionally when providing gifts, hospitality, entertainment or any other benefit directly or indirectly to a Public Official, the individual providing the benefit must make sure that it:

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

(together, the 'Public Official Expenditure Requirements').

If you are providing the gift or entertainment to a Public Official, it is your responsibility to ensure that it satisfies the requirements of the Public Official Expenditure Requirements.