Who does this policy apply to?

Everyone working with Computacenter (CC); 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 as needed. You can find all our up to date policies our intranet site.

Why do we have this policy?

CC are 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 CC within individual countries, across Europe and the world.

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 the organisation itself are at risk (or anything else that you reasonably believe would be in the public interest).

This is known as Whistleblowing and we want to make sure you know how you can raise concerns and be reassured that it is safe to do so without any fear of retaliation.

What’s meant by ‘Public Interest’?

This is where the interests of others or of the organisation 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 this 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 something, we can’t act upon it.
Raising Concerns

You should speak up if you have any suspicions of inappropriate conduct, so it 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 to be worried about a situation, and if you have any thoughts on how we can resolve it.

Whatever way you raise a concern, whether it’s by telling your line manager, informing another appropriate contact in the Group, or through our 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 CC, 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 this 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 this or any other CC policy to our independent confidential hotline, supplied by Safecall.

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

You can contact Safecall 24hours a day, seven days a week. The number to call is dependent on the country you are calling from.

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<tr>
<th>Country</th>
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<tr>
<td>Belgium</td>
<td>Y</td>
<td>00 800 72332255</td>
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<td>China Unicom/Netcom 10800 7440605</td>
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What happens if I raise a concern?

Once a concern has been reported the person approached has an obligation to treat any information received, and the identity of the whistle-blower, in a confidential manner.

The person who it was raised to will need to pass the information received onto the Group Head of Legal and Contracting or the Group HR Director. This 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 possible because the confidentiality we need to apply around matters of this nature.