Group Policy against Bribery and Corruption

Who does this policy apply to?

This policy applies to all permanent and temporary employees, contractors and consultants working for any of the Computacenter Group of companies (referred to as Computacenter in the text).

Also, as this policy isn’t part of your contract, we’re able to change it if we need to from time to time.

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.

Why do we have this policy?

It has always been Computacenter’s policy not to tolerate any dishonest behaviour, since it is part of our culture that Computacenter wants to carry out its business fairly, honestly and transparently. This includes a zero-tolerance policy with respect to bribery and corruption.

All management of Computacenter is committed to achieve this objective by abiding by the following rules issued by the Head of Group Legal and Contracting.

Prohibition of bribery

Computacenter group with all its organisational and business units, all its members of staff and anyone acting on behalf of Computacenter (third parties) must not:

• provide, promise or offer a bribe to either public officials or to partners during business;
• demand, accept promises of or accept a bribe to either public officials or to partners during business; or
• make facilitation payments to public officials or their equivalents (foreign officials and equivalents included).

Moreover, they must refrain from threatening behaviour or retaliation against an employee or anyone else who refuses to commit a bribe, or who expresses reservations in this context.

Acceptable gifts, hospitality, donations and similar benefits

Computacenter do not prohibit reasonable and proportionate Gifts, Entertainment and Hospitality being given to and received from third parties. It is not prohibited if:

• it is not done with the intention that it will result in a specific business advantage for Computacenter in obtaining or retaining business;
• it is not done in ‘return for a favour’;
• it complies with local law in the country in which made;
• it is given in the name of Computacenter, not in the name of any individual;
• it is appropriate in the circumstances and would not cause Computacenter any embarrassment if it was reported in the newspaper;
• considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
• it is given openly and recorded as such on a Gifts, Entertainment and Hospitality register, and not secretly.
Moreover, when providing gifts, hospitality, entertainment or any other benefit directly or indirectly to a Public Official, the individual providing it must make sure that it complies with the following three ‘Public Official Expenditure Requirements’:

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

**Prior written approval by a senior manager is required**

- before giving or receiving a gift of over £ 125 / € 150 / $ 165 per head or £ 500 / € 600 / $ 660 in total, in case of a single event;
- before giving entertainment, gifts or hospitality in any 3-month period with a cumulative value of over £ 650 / € 770 / $ 850;
- always if entertainment, gifts or hospitality is also provided to friends or family members of the recipient;
- always if the recipient is a public official;
- always during an active bid (unless low value, e.g. a cup of coffee or a branded item).

A senior manager is defined as directly reporting into a Group Exec member (a Group Exec member is directly reporting into the CEO).

**Gift and Hospitality Registers**

Any giving and receiving of Gifts, Entertainment and Hospitality (except those of low value under £ 21 / € 25 / $ 28) must be recorded in the Gifts and Hospitality Registers that are maintained by every company belonging to Computacenter group.

**Communication and awareness**

Activities are implemented to

- ensure all employees are aware of and understand the policy against Bribery and Corruption and complete Anti-Bribery and Corruption training available on our online training platform;
- explain how gifts and hospitality is properly recorded on Gifts and Hospitality registers;
- make employees aware that they have to ensure incidents must be reported using the procedure described below if an act of bribery or corruption is contemplated or initiated by a person working for public authorities or business partners.

**Preventative controls**

Computacenter utilises preventative controls that are adequate to the bribery risk. They may include among others:

- Organisation based controls (as for instance instructions to third parties; filing of anti-bribery compliance commitments; segregation of duties and “four-eyes-principle”);
- Technology based controls (as for instance limitation of transactional rights and permissions of business roles; restriction to allowed posting and accounting; statistical evaluation of business transactions to detect potential anomalies).

**Raising concerns in confidence**

All individuals who work for, with or on behalf of Computacenter have a responsibility to help detect, prevent and report instances of bribery and corruption. 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

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1 The full list of legal entities belonging to Group is contained in the Computacenter plc Annual Report and Accounts, available on [https://investors.computacenter.com/results-centre](https://investors.computacenter.com/results-centre), see section “Investments in subsidiaries” there.
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.

Employees are strongly encouraged to report any violation of this or any other Computacenter policy via the Safecall whistleblowing hotline. You can use the hotline completely anonymously, partly anonymously or you can provide your details. A partly anonymous report enables follow up questions, as Safecall retain your details but these are not passed to Computacenter. The complete list of telephone numbers available to report a concern to Safecall can be found in the Group Ethics Policy.

Safecall can also be contacted by email on computacenter@safecall.co.uk or via the web at www.safecall.co.uk/report.

You can also report any violation either to a manager, the Head of Group Legal and Contracting, the Chief People Officer or the Group Compliance Manager. 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.

As a manager you have a responsibility to report whistleblowing in accordance with the whistleblowing policy. Please refer to the Whistleblowing Guidance for Managers.

The person who it was raised to will then 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 violations (or suspected violations) of this policy may be reported anonymously in writing to the appropriate person in-country (as explained above).

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.

If your concern is about your employment with Computacenter 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.

Investigation and follow-up

Where an allegation / incident of bribery or corruption is reported, Computacenter will coordinate investigation and any follow up actions required. Following an initial assessment of the allegation / incident the required response activity will be recorded and reported, and any improvement activities that need to be actioned to reduce the risk rating of the activities concerned will be actioned.

Assurance

Independent assurance on the effectiveness of this policy against bribery and corruption, and of the applied processes, is provided by the Internal Audit function, based on their audit schedules.

Implementation Guideline

Guidance for the implementation of this policy, including definition of important terms, specification of responsibilities, and detailed instructions, is given in the "Implementation Guideline – Procedures against Bribery and Corruption" document.