



## STATEMENT UNDER SECTION 54 OF THE UK'S MODERN SLAVERY ACT 2015

### Introduction

Westcon-Comstor is a leading global distributor of business technology.

Operating in more than 70 countries, we deliver business value and opportunity by connecting the world's leading IT vendors with technology resellers, systems integrators and service providers.

Our group specialises in the distribution and integration of technology used within network and telecoms infrastructure, the build out of data centres, as well as hardware and software required for collaboration and security.

Westcon Group European Operations Ltd and Westcon Group Africa Operations Ltd are committed to preventing acts of modern slavery and human trafficking from occurring within their businesses and supply chains and expect all suppliers to adhere to the same standards.

### Structure of the organisation

Westcon Group European Operations Ltd and Westcon Group Africa Operations Ltd are subsidiaries of Westcon International Limited whose ultimate parent company is Datatec Limited, a company incorporated in South Africa.

Westcon group's headquarters are based in the United Kingdom with sales offices and distribution centres across EMEA and APAC.

### Measures

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, as well as to implementing controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our commitment to combating modern slavery, child labour and human trafficking, we have a number of measures in place to ensure that we are conducting business in an ethical and transparent manner. These include:

- We have a Code of Conduct which requires ethical dealing with suppliers and customers, adherence to our Anti-slavery Policy, as well as a zero-tolerance approach to slavery, child labour and human trafficking;
- The group operates a [hotline](#) which allows any violations of our Anti-slavery policy or Code of Conduct to be reported anonymously; no colleague will suffer any retaliation by the Company due to a report being made; our hotline is regularly monitored by our parent company, Datatec;



- As part of our vendor onboarding process, we ensure that new vendors with which we do business are operating legally and ethically – this includes adherence to our Code of Conduct which incorporates commitments related to modern slavery and child labour;
- As part of our contracting process for vendors, we require them to confirm compliance with the Responsible Business Alliance Code of Conduct, as well as agreeing to specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children;
- We also require sub-contractors to comply with our Code of Conduct;
- We require vendors to disclose whether there are any Conflict Minerals in products we source from them; and
- We conduct annual online training and certification for employees to ensure awareness and adherence to our Code of Conduct.

### **Environmental, Social & Governance (ESG)**

In the previous financial year (2022-23), Westcon appointed an ESG function to oversee the Company's performance on a range of Ethics & Sustainability issues, including human rights.

Our programme is run in co-ordination with our parent company, Datatec's own social and environmental function.

In relation to modern slavery, ESG has drafted a detailed list of human rights-related questions that will be sent out to major vendors by the end of 2023. ESG has also created a Conflict Minerals policy for the acquisition of stock items from the Company's vendors.

### **Sustainability ratings**

Westcon is registered with EcoVadis, a global provider of business sustainability ratings. Westcon's performance is assessed annually by EcoVadis across a variety of areas, including Ethics, Sustainable Procurement and Labour & Human Rights (the latter includes Child Labour, Forced Labour and Human Trafficking). During our 2023 assessment, we achieved a nine-point improvement in our overall score from the previous year.

We continue to use the EcoVadis platform as a mechanism to identify areas for improvement. A priority for the coming year is to incorporate additional quantitative metrics within our annual sustainability report to support increased transparency and accountability across ESG topics.



## Audit of vendors

In the previous financial year, we completed a modern slavery audit of our top ten vendors by revenue. This involved asking them to complete a questionnaire with thirty-six questions.

The questions were designed to assess the effectiveness of vendors' modern slavery programmes, as well as to develop insight into the risks in Westcon's supply chain. As part of this, we asked for detailed information on which countries the vendors' products are manufactured in.

We received nine responses back. The results from these are summarised in this table:

<b>Policy</b>	
Have a modern slavery policy	78%
Expect first tier suppliers of stock items to adhere to vendor's modern slavery policy	89%
Part of initiative or standard relating to combatting modern slavery	60%
<b>Assessments, Mapping &amp; Screening</b>	
Mapped out supply chain and carried out modern slavery risk assessment	33%
Inspected premises of direct suppliers	33%
Screens new suppliers against modern slavery risks	33%
Carried out assessment of how purchasing practices could increase risk of modern slavery	33%
<b>Training</b>	
Requires own staff to undertake modern slavery training	22%
Ensures staff members of direct stock suppliers complete modern slavery training	11%
<b>Monitoring</b>	
Have KPIs in place to measure mitigation of modern slavery risks in the vendor and its supply chains	33%
<b>Reporting</b>	
Operates a whistleblowing hotline	78%
Ensures staff members of first tier suppliers have access to an anonymous whistleblowing hotline	44%
<b>Oversight</b>	
Have somebody at board level who ensures compliance with modern slavery policies	67%
<b>Breaches</b>	
Have SLAs in place with stock suppliers to ensure they have to respond to reports of modern slavery within a given timeframe	11%
Uncovered incidence of modern slavery in supply chain within last 12 months	11%

## Supply Chains

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains all new vendors are required to undergo an onboarding and due diligence process to ensure that vendors with which we do business are operating legally and ethically.

## Risk and compliance

We consider that the risk of modern slavery occurring in our first-tier supply chain is low because most of our major suppliers are large, industry leading organisations who have adopted their own anti-slavery policies and procedures.



As all Westcon entities have a common supply chain, it was not necessary to consult separately with the entities listed above in assessing our risk profile.

**Remediation**

In the event slavery, human trafficking or child labour is suspected or discovered in any part of our supply chain, the relevant vendor manager, Head of ESG and if required, our Compliance Officer and / or our General Counsel will open discussions with the affected vendor so that a remediation plan can be created.

**Training**

All our employees are required to complete annually an interactive online training course which includes awareness of our Code of Conduct. As part of this, we encourage colleagues to use our whistleblowing hotline if they have concerns which they would like to raise.

Our ESG team has also rolled-out “ESG Fundamentals” training which covers a variety of areas, including human rights and ethics.

**Further actions**

In the current financial year (2023-24), our ESG team is intending to send out a detailed survey to our top seven vendors by revenue. This will build upon the modern slavery audit that was initiated in the 2021-22 financial year. When the results have been received, they will be analysed to develop further insight into the risks in Westcon’s supply chain. We will then be able to determine what further steps need to be taken to mitigate the risk of human rights issues, including modern slavery.

This statement was approved by the boards of Westcon Group European Operations Ltd, Westcon Group Africa Operations Ltd and Westcon International Ltd

Signed

DocuSigned by:

765D49D35444FE...

David Grant  
Chief Executive Officer