

# Norwegian Transparency Act Statement FY26

Westcon-Comstor is a leading global distributor specialising in cybersecurity, networking and hybrid cloud solutions, connecting the world's leading IT vendors with a global ecosystem of channel partners, operating across a multi-tier value chain spanning upstream vendor manufacturing and logistics, its own global operations, and downstream delivery to end customers.

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 Norway AS (Westcon-Comstor Norway) is committed to ensuring there are no human rights abuses occurring in our supply chains or in any part of our business. Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships.

This commitment is underpinned by our parent company, Datatec's, membership of the UN Global Compact and the incorporation of its ten principals within the group's policies. This includes supporting and respecting the protection of internationally proclaimed human rights and making sure there is no complicity in human rights abuses.

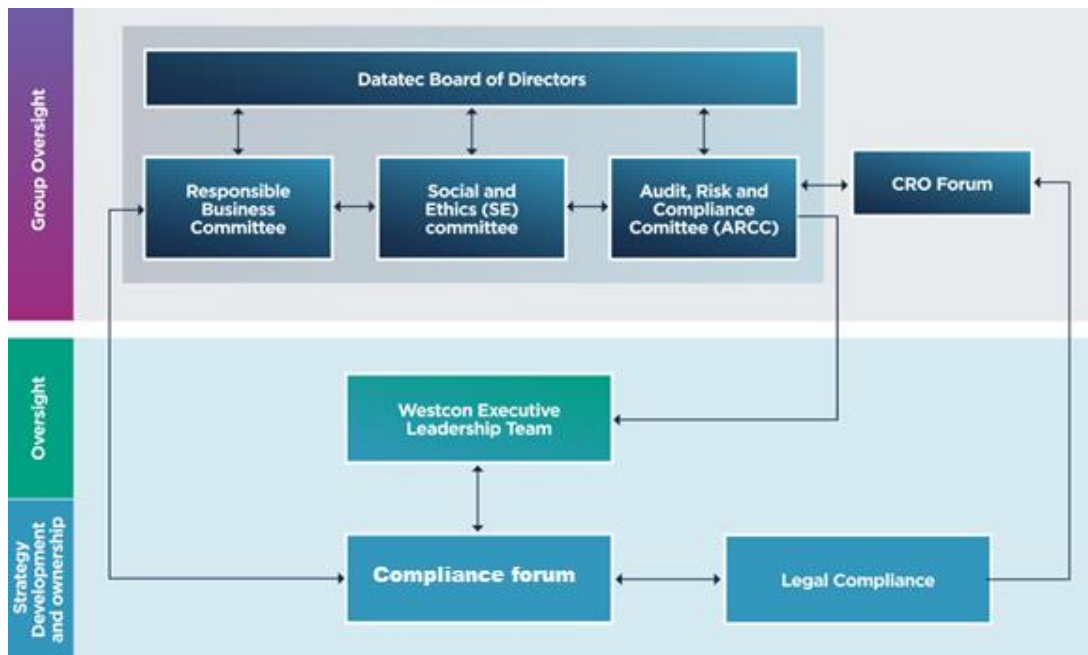
## About Westcon Group Norway AS

### Company structure

Westcon-Comstor Norway is a wholly owned subsidiary of Westcon Group European Operations Limited whose ultimate parent company is Datatec Limited, a company incorporated in South Africa. Westcon-Comstor Norway does not own or control any subsidiaries.

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

A governance structure has been established to define roles and responsibilities for ESG matters, including labour and human rights issues, as outlined below:



## Our Norwegian business

As a specialist IT distributor, Westcon-Comstor Norway works with industry leading manufacturers who specialise in networking, datacentre, security and collaboration products to deliver a range of physical hardware & virtual products and services to our customers in Norway.

Our customers are a combination of service providers, system integrators and information technology resellers.

The domestic distribution of these products is managed via a third-party logistics partner in Norway.

Westcon-Comstor Norway's sales office is located in Oslo with a team of twenty individuals working in mainly Sales, Marketing and Customer Service roles.

## Measures

As part of our commitment to combating human rights abuses, we have a several Company-wide 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;
- All new stock vendors and non-stock vendors undergo an onboarding process to ensure that they are operating legally and ethically – this includes adherence to our Code of Conduct which has been updated to include additional provisions linked to labour and human rights
- As part of our contracts for stocking vendors, we require adherence to the Responsible Business Alliance (RBA) Code of Conduct and include 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 stocking vendors to disclose whether there are any Conflict Minerals in products we source from them;
- We conduct annual online training and certification for employees to ensure awareness and adherence to our Code of Conduct;
- The group has a whistle-blowing [hotline](#) which allows violations of our policies, including our Code of Conduct to be reported;
- We utilise the EcoVadis sustainability ratings platform to provide an independent view on our performance across labour, human rights and ethics and drive continuous improvement in our policies, actions and reporting of results;
- We have appointed an ESG team to oversee a range of sustainability issues, including human rights; and
- Our ESG program is run in co-ordination with our parent company to ensure a consistent approach. The Audit, Risk and Compliance Committee provide Group level oversight for labour and human rights risks and impacts.

These measures are designed to support a risk-based approach to identifying, preventing and addressing potential adverse human rights impacts in line with the requirements of the Norway Transparency Act.

## Risk assessments

We recognise that risks of adverse human rights impacts may arise across our value chain, particularly in complex global supply chains associated with the distribution of information technology equipment.

While many of our direct suppliers are large, established organisations, we acknowledge that risks may exist beyond tier 1 suppliers, particularly in upstream manufacturing and raw material extraction.

### Supplier Due Diligence Approach

We conduct supplier due diligence as part of our ongoing commitment to responsible sourcing.

In 2023, we undertook a formal due diligence exercise across our supply chain, engaging directly with suppliers to assess labour practices and identify areas of potential risk.

In FY26, we further enhanced our approach by introducing a risk-based methodology for supplier prioritisation. Using a combination of AI-assisted analysis via Datamaran and external risk intelligence tools, we assessed suppliers against two key criteria:

- The extent to which suppliers address labour and human rights topics within their ESG and financial disclosures
- The level of inherent human rights risk associated with their industry

This approach enabled us to prioritise engagement with suppliers where the potential for unidentified or unmanaged risk was greatest.

Following this desktop assessment, we conducted targeted engagement with higher-risk suppliers to better understand their practices, governance structures and due diligence processes.

Based on the outcomes of this cycle, we identified opportunities to further strengthen our approach and intend to expand both the breadth and depth of supplier engagement during FY27.

## Risks and adverse impacts

Our assessments indicate that the most significant risks of adverse human rights impacts are concentrated in upstream supply chains beyond our direct suppliers, where visibility remains limited.

Key risk areas identified include:

1. Limited supply chain transparency beyond tier 1  
Many suppliers have not yet fully mapped their upstream supply chains, limiting visibility of potential risks.
2. Inconsistent due diligence beyond direct suppliers  
While due diligence is commonly conducted at tier 1, this is less frequently extended to sub-suppliers.
3. Potential underreporting of labour and human rights issues  
The absence of widespread on-site audits and independent verification increases the likelihood that actual rates of adverse impacts may be higher than reported.

### Assessment Outcomes

Our supplier assessments include evaluation across key pillars such as governance, due diligence, monitoring and remediation. Based on our scoring methodology, suppliers are categorised according

to risk level to support prioritised engagement.

Where risks are identified, we engage directly with suppliers to:

- Provide feedback on identified gaps
- Understand root causes
- Encourage the development of corrective action plans

In cases where potential breaches are identified, we seek assurance that appropriate remediation actions have been taken and assess the robustness of supplier controls, including:

- Alignment with the Responsible Business Alliance Code of Conduct
- Use of third-party audit programmes
- Existence of corrective action and escalation procedures
- Training and capacity-building initiatives

#### **FY26 indicators:**

- Percentage of hardware stock vendors (by spend) that went through desktop ESG assessment: 86%
- Percentage of hardware stock vendors (by spend) that received additional due diligence assessment: 22%

## Remediation

Where we identify actual or potential adverse human rights impacts, we are committed to taking appropriate and proportionate action.

This includes:

- Engaging directly with suppliers to investigate and understand the issue
- Requiring the development and implementation of corrective action plans
- Monitoring progress and providing follow-up where necessary
- Escalating issues where appropriate, including reconsideration of the business relationship

We aim to ensure that remediation efforts are focused on addressing root causes and improving outcomes for affected individuals.

We also maintain a [whistleblowing mechanism](#) that enables concerns to be raised confidentially or anonymously. Reports are reviewed and managed through established governance processes, with oversight from senior leadership. Retaliation against individuals who raise concerns is strictly prohibited.

## Results and future plans

A key outcome of our recent due diligence activities has been an improved understanding of the nature and distribution of human rights risks within our supply chain, enabling a more targeted and risk-based approach to supplier engagement.

Looking ahead, we will continue to strengthen our approach by:

- Expanding the scope of supplier assessments to cover a greater proportion of total supplier spend
- Enhancing our risk-based methodology, including the use of data and analytics to identify emerging risks
- Increasing engagement with higher-risk suppliers, including more in-depth dialogue and follow-up
- Extending due diligence to additional supplier segments, including strategic non-stock suppliers
- Continuing regular reassessment cycles to monitor progress and changes in risk exposure over time

We remain committed to continuous improvement in our approach to human rights due diligence, in line with evolving regulatory expectations and best practice.