

## STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

### Introduction

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 chain 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 whose ultimate parent company is Datatec Limited, a company incorporated in South Africa. We work with a range of suppliers from major manufacturers and distributors of IT equipment and services to smaller organisations providing services or products.

### Policies

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 and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains:

<https://secure.ethicspoint.com/domain/media/en/gui/39261/index.html>

As part of our commitment to combating modern slavery, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Westcon operates a hotline so that any violations of the policy can be reported anonymously; no employee will suffer any retaliation by the Company (directly or indirectly) due to a report made in good faith.
- Westcon has an internal vendor onboarding process to ensure that new suppliers with which we do business are operating legally and ethically including Conflict Minerals and Environmental compliance
- Westcon requires its sub-contractors to also comply with its code of conduct
- Westcon conducts yearly online training and certification for its employees to ensure adherence to the Code of Conduct.

### Supply Chains

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains our supplier contracts now require all new suppliers to

undergo a vendor on boarding process to ensure that new suppliers with which we do business are operating legally and ethically.

**Risk and compliance**

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain. 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.

**Training**

All of our employees are required to complete annually an interactive on-line training course about our Code of Conduct, and to pass a test to show that they have understood the Code. The training course encourages employees to identify and report any potential breaches of our anti-slavery policies and gives details of our independent whistleblowing hotline.

**Further actions**

During this financial year we will be also taking steps to register with and adopt the Electronic Industry Citizenship Coalition Code of Conduct where we will require our next tier suppliers to acknowledge and implement the Code.

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

Signed



David Grant  
Chief Operating Officer