



## 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 (Mar 2023 – Feb 2024, FY24), to reinforce our commitment on climate and the environment, Westcon appointed its first Chief Sustainability Officer to lead on ESG issues.

Our ESG programme is run in co-ordination with our parent company, Datatec's social and environmental function and oversees the Company's performance on a range of Ethics and Sustainability issues, including human rights.

### **Sustainability ratings**

Westcon is registered with EcoVadis, a global provider of business sustainability ratings. Westcon's performance is assessed annually by EcoVadis across a range of areas, including Ethics, Sustainable Procurement and Labour & Human Rights (the latter includes Child Labour, Forced Labour and Human Trafficking).

We continue to use the EcoVadis platform as a mechanism to identify areas for improvement. During FY24, our APAC operations had their first assessment and achieved a Silver rating. EMEA maintained a Bronze rating with an overall 6-point improvement on the score from the previous year. We plan to undertake our first global level assessment in FY25.

A priority for FY25 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 twelve vendors by revenue. This involved asking them to complete an online self-assessment questionnaire.



The questions were designed to assess the effectiveness of vendors' labour and human rights programmes, including modern slavery, 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:

Policy	
Have a modern slavery policy	78%
Expect first tier suppliers of stock items to adhere to vendor's modern slavery policy	56%
Part of initiative or standard relating to combatting modern slavery	56%
Assessments, Mapping & Screening	
Mapped out supply chain and carried out human rights due diligence when onboarding suppliers	67%
Conducted audits on direct suppliers in relation to human rights and labor condition	44%
Training	
Requires own staff to undertake training on human rights, modern slavery, and labor conditions	67%
Ensures staff members of direct stock suppliers complete modern slavery training	33%
Reporting	
Operates a whistleblowing hotline	100%
Ensures staff members of first tier suppliers have access to an anonymous whistleblowing hotline	77%
Oversight	
Have somebody at board level who ensures compliance with modern slavery policies	56%
Breaches	
Have SLAs in place with stock suppliers to ensure they have to respond to reports of modern slavery within a given timeframe	56%
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 FY25, the ESG team is planning to send the modern slavery audit questionnaire to thirteen additional vendors.

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

Signed

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David Grant  
Chief Executive Officer