

Norwegian Transparency Act Statement

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 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.

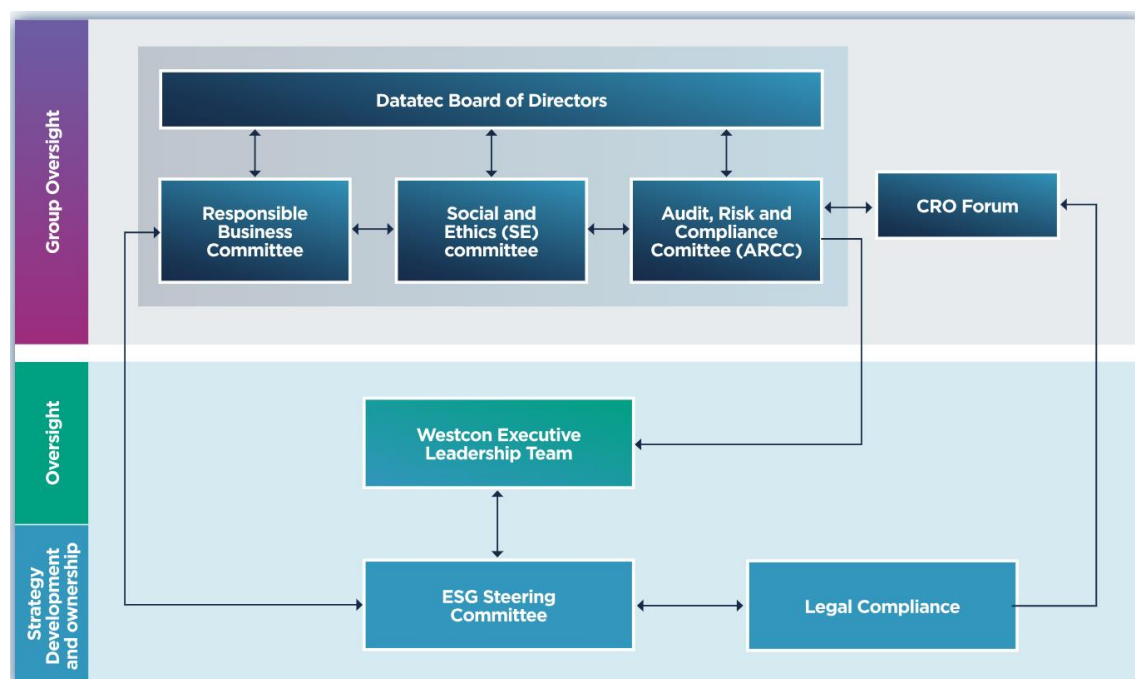
About Westcon Group Norway AS

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.

Risk assessments

We consider that the risk of human rights abuses occurring in our first-tier supply chain is low because most of our major vendors are large, market-leading organisations. However, we recognise that there is a relatively high risk of impacts occurring past tier 1, given the convoluted nature of information technology equipment supply chains and the geographies involved.

In financial year 2023/24, we designed and deployed a detailed sustainability questionnaire via a third party cloud-based platform, with the intention of surveying our largest vendors across a number of topics including labour and human rights.

From a labour and human rights standpoint, we asked 28 questions across the following sub-sections:

- Supply Chain Mapping - The structure and geographical spread of our core vendor base, with a view to gaining insight into key entities and flows within our upstream supply network.
- Labour and Human Rights Governance – Governance structures, policies, and reporting practices our vendors have in place with regards to labour and human rights issues within their own operations and direct suppliers
- External Due Diligence – The level of due diligence conducted by our vendors in recognition that actual and potential adverse social and environmental impacts are likely to be larger upstream in the supply chain
- Conflict Minerals – information relating to 3TG mineral content within our vendors hardware products

Each response was scored against defined criteria which allowed us to systemically analyse the results within the platform, benchmark our vendors performance, as well as highlighting any areas considered to be particularly high risk for immediate attention.

We then held follow up meetings with our vendors to share the results, provide feedback on both strengths and improvement areas, and obtain clarification on future plans to address any shortcomings.

Risks and adverse impacts

At the end of the financial year, we had received 8 responses from 12 suppliers surveyed representing 57% of our total supplier spend. Suppliers were placed into high, medium and low risk categories based on their responses and our scoring criteria:

High Risk – 6 suppliers

Medium Risk – 2 suppliers

Low Risk – 0 suppliers

A number of risks were identified as follows:

1. Visibility of the upstream supply chains (above tier 1) remains low with most surveyed suppliers not having completed a supply chain mapping exercise. This makes assessing relative risk challenging due to a lack of transparency.
2. Although most suppliers conduct due diligence on direct suppliers, this does not, in most cases, extend to sub-suppliers making it difficult to assess adherence to labour and human rights standards above tier 1.
3. It's likely that actual rates of material labour and human rights abuses are higher than the 11% reported by our suppliers on the basis that not all suppliers are conducting on-site audits.

The overall results are summarised in this table:

Policy	
Have a written human rights policy	78%
Expect first tier suppliers to adhere to vendor's human rights policy	71%
Part of initiative or standard relating to combating human rights abuses and unacceptable labour conditions	56%
Assessments, Mapping & Screening	
Mapped out supply chain of direct suppliers above tier 1	22%
Carried out audits on direct suppliers in relation to human rights and labour conditions within the last 12 months	44%
Carried out due diligence on human rights and labour conditions when onboarding suppliers	78%
Monitoring	
Carried out periodical monitoring on direct suppliers in relation to human rights and labour conditions	78%
Oversight	
Have somebody at board level who has ownership of human rights, modern slavery, and labour standards	56%
Breaches	
Require direct suppliers have to provide a root cause analysis and formal remediation plan in cases where slavery is discovered	78%
Uncovered any material breaches of human rights or working conditions occurred in the past year within last 12 months	11%

We highlighted the breach identified as part of our survey with the supplier in question and they have assured us that it has been addressed appropriately. We consider their policies and measures to reduce potential/actual impacts to be robust which include the following:

- Requiring suppliers to comply with the Responsible Business Alliance Code of Conduct
- Conducting an annual risk assessment to include both new and existing suppliers
- Using the Responsible Business Alliance's Validated Assessment Program to conduct 3rd party supplier audits
- A documented corrective action procedure to deal with non-compliance, with the possibility of termination for those failing to comply
- Supporting training and capacity building for high risk suppliers to share best practices

Remediation

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

The group has a whistle-blowing [hotline](#) which allows violations of our policies, including our Code of Conduct to be reported. Our hotline allows anonymous reporting and is regularly monitored by our parent company, Datatec with cases reviewed during the Audit, Risk and Compliance Committee meetings. No colleague will suffer any retaliation by the Company due to a report being made.

Results and future plans

A key outcome from FY23/24 was improving our understanding of the level of risk represented by our key vendors, to help us direct priority for on-going engagement and efforts to further improve transparency.

Over the coming months we plan to expand the scope of our sustainability questionnaire by:

- Increasing the number of vendors we are assessing to cover a higher percentage of our total supplier spend
- The creation of a second questionnaire to target strategic non-stocking suppliers and other suppliers deemed to be high risk driven by industry and geography.

We will continue to engage with existing vendor participants, with plans to meet on a 6 monthly basis to maintain a dialogue on matters arising from the previous assessment. All participants will be requested to undergo a survey re-assessment on an annual basis to allow us to monitor progress and assess changes to the risk landscape over time.