

# 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.

### **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-two individuals working in mainly Sales, Marketing and Customer Service roles.

## Measures

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.

As part of our commitment to combating human rights abuses, 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;
- 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 incorporates commitments related to modern slavery and child labour;
- 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;
- 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 are run in co-ordination with our parent company, Datatec's own ESG resources to ensure a consistent approach.

In financial year 2022/23, we carried out a modern slavery audit of our top ten stocking vendors which represent the vast majority of our revenue. This involved asking them to complete a questionnaire with thirty-six questions designed to assess the effectiveness of their modern slavery programmes, as well as to develop insight into the risks in Westcon's supply chain.

As part of this, we asked for information on which countries the vendors' products are manufactured in. At the date of this statement, we have received nine responses back. The key results 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%

## 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. No colleague will suffer any retaliation by the Company due to a report being made.

## Future plans

Over the past twelve months, we have been placing an increasing amount of emphasis on engagement and collaboration with our largest stock vendors on ESG topics. This has involved conducting a risk analysis across a range of key criteria, including conflict minerals.

We are currently developing an enhanced suite of questions to expand our existing ESG vendor assessment with human rights topics. We anticipate this will be sent out to our top seven stocking vendors by September 2023.

As part of this exercise, we will be conducting a supply chain mapping exercise to better understand our vendors' risk profiles based on the geographies in which they and their sub-suppliers operate.

We are also looking at shifting to a digital platform for future iterations of our vendor assessments. We anticipate this will allow us to collect data from a broader group of our vendors.