



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;



- 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 parent company’s Code of Conduct which incorporates the UN Global Compact, with Principles 4 and 5 on forced and child labour being of particular relevance;
- As part of our contracting processes, we 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 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.

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 that slavery, human trafficking or child labour is suspected or discovered in any part of our supply chain, the relevant vendor manager and 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 of 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.

Further actions

During this financial year we will be engaging with Tier 1 vendors to obtain more insight into the existence, identification and management of modern slavery risk in their supply



Delivering Results Together
powered by WestconGroup

chains. As part of this exercise, we will be carrying out a risk assessment to identify higher risk vendors and product categories, as well as developing measures to assess the effectiveness of the actions we are currently taking.

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

Signed

DocuSigned by:

A handwritten signature in black ink, appearing to read "David Grant".

765D49D35444EE
David Grant

Chief Operating Officer