

# Modern Slavery Statement

Computacenter plc



Computacenter

## Computacenter plc Modern Slavery Statement 2024

We are committed to ethical, responsible, and sustainable corporate management and continue our commitment to upholding the internationally proclaimed human rights of all people in all our business interactions. This means we expect all our suppliers to take actions to ensure that their practices support and protect individual human rights.

We are against all forms of modern slavery, human trafficking, bonded and forced or compulsory labour and believe these practices have no place in society.

We are committed to making certain that we are not complicit in any human rights violations and require our suppliers and partners to adhere to this same high standard.

This statement fulfils the requirements of Section 54 [Transparency in supply chains] of the Modern Slavery Act 2015 and covers the period of 1 January 2024 to 31 December 2024. This statement outlines the steps taken by Computacenter PLC and all its subsidiaries to prevent modern slavery and human trafficking in its supply chain.

## Building long-term value based on trust

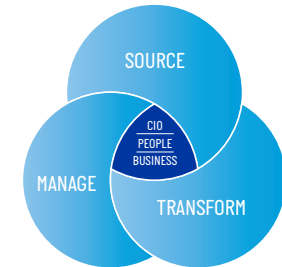
### Who we are

We are a leading independent technology and services provider, trusted by large corporate and public sector organisations. We are a responsible business that believes in winning together for our people and our planet.

Computacenter is one of the world's six largest value-added resellers (VAR) of information technology (IT). We are also a major international IT services company.

### What we do

We help our customers to Source, Transform and Manage their technology infrastructure to deliver digital transformation, enabling people and their business.



### Our Purpose

Helping our customers change the world

Our customers are some of the world's greatest organisations, in both the corporate and public sectors. They make world-changing decisions and investments and while we do not change the world ourselves, we enable success for our customers so that they can realise the transformative benefits of IT for their organisations, people, and the world. We work hard to get to know our customers, understand their needs and put them at the heart of everything we do.

## MODERN SLAVERY STATEMENT

Our business is diversified across our main territories and our three business areas. These business areas are distinct, but synergistic, as customers increasingly look to buy end-to-end services and solutions, including consulting, product supply life cycle services, integration and managed services. Computacenter is headquartered in the UK, within the Computacenter group, we have over 20,000 people based across Europe, North America, Mexico, South Africa, and Asia Pacific. We have developed a global coverage to mirror our customer's requirements.

### We Source, Transform and Manage technology for our customers in over 70 countries worldwide

#### We sell to customers in eight countries

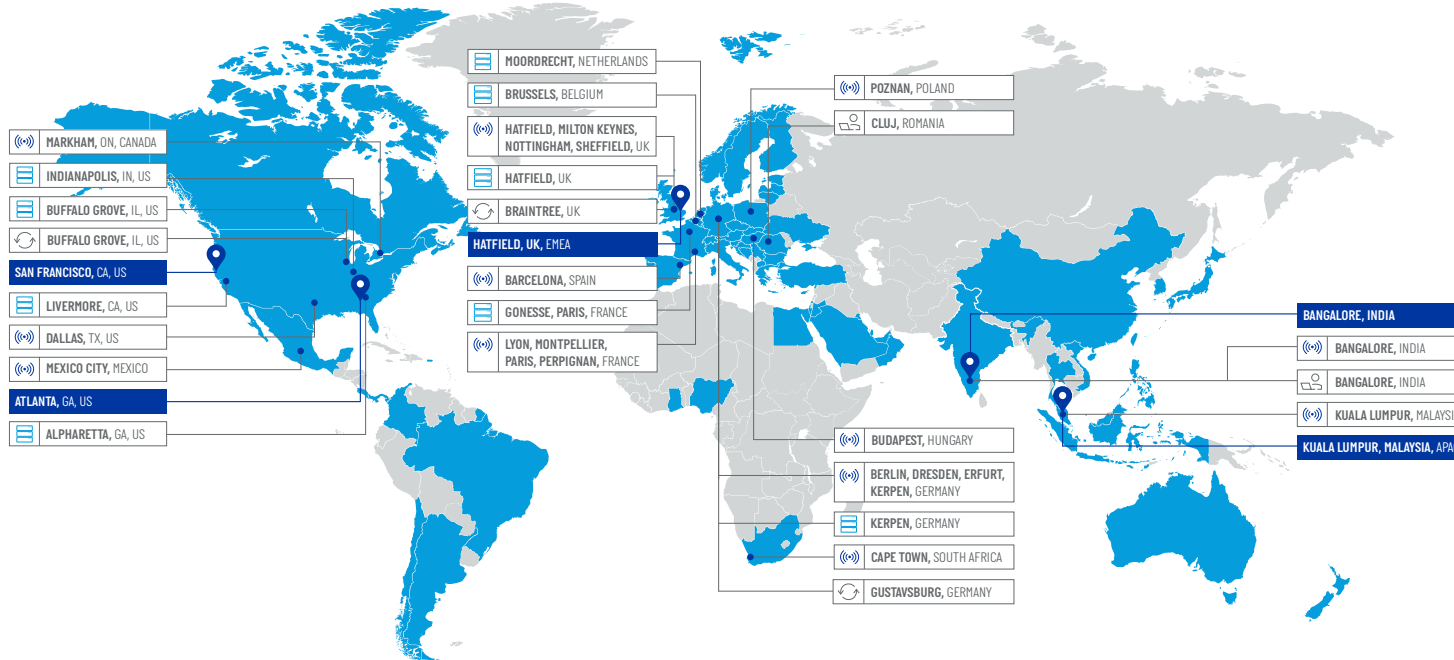
Belgium	Netherlands
Canada	Switzerland
France	United Kingdom
Germany	United States

#### We have nearshore and offshore operations in another eight countries

Hungary	Poland
India	Romania
Malaysia	South Africa
Mexico	Spain

#### We have support operations in another seven countries/territories

Australia	Ireland
Brazil	Japan
China	Singapore
Hong Kong [SAR]	



Our extensive partner network covers field services and onsite support globally and services Computacenter's European and US headquartered customers.

Our supply chain is made up of products and services that we use in our business; our employees and contractors; partner organisations who we work with; and IT equipment which we supply to our customers.

For Computacenter, human rights fall into two areas: protecting the rights of our employees and ensuring we are not complicit in human rights abuses in our supply chain.

To ensure that we continue to operate in alignment with our company values and sustainability goals we believe it is necessary to ensure that our supply chain is similarly aligned and is operating in a lawful and responsible manner.

### Our policies in relation to slavery and human trafficking

Our commitment to human rights means we have adopted the principles of the leading international standards and conventions across our business dealings, in particular the UN Global Compact (signatories since 2007), the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Conventions on Rights of the Child, and fundamental conventions of the International Labour Organization (ILO) and understand our responsibility to respect and support human rights.

The human rights of our employees are covered by our people policies and compliance with local labour laws and fair labour practices wherever we do business. This includes our Health and Safety, Respect and Equality at work policies, our disciplinary and grievance processes and terms and conditions of employment.

Our [Group Ethics policy and Code of Business Conduct](#) sets out our commitment to observing the highest ethical standards in our business conduct, including the protection of human rights and has been endorsed by the Board of Directors.

Our [Group Speak Up \(whistleblowing\)](#) policy explains how our people and anyone in our supply chain can report any concerns they may have through the external, independent reporting service, provided by Safecall. The details of Safecall are publicised internally on our compliance portal, in our Group Ethics policy and Code of Business Conduct, through an annual multi-channel communications campaign and are included in all our compliance training. Those within our supply chain are informed of Safecall and the requirement to report any concerns they may have via our Supplier Code of Conduct. Our Group Speak Up (whistleblowing) policy is also published on our company website to ensure that it is easily accessible to anyone within our supply chain.

Any concerns raised are fully investigated, with oversight from the Group Legal and Compliance Director and Chief People Officer. As part of our wider processes around managing reports; risks and issues are reported to the Group Risk Committee and to the Audit Committee of the Board of Directors.

In 2024, there were no issues raised within the Company that related to modern slavery or human trafficking amongst our people or in our supply chain.

We also have a comprehensive [Anti-Bribery and Corruption policy](#), and [Supplier Code of Conduct](#).

As part of our supplier onboarding, all potential suppliers in our core countries are provided with our Supplier Code of Conduct which clearly lays out our requirements within both the modern slavery and wider compliance environment and sets out related standards of how they are expected to conduct themselves within their business operations. As part of the Code of Conduct, suppliers are required to notify Computacenter of any breach of these standards and to take appropriate steps to remedy them.

Any breaches of the requirements of our Code of Conduct are considered by us to be very serious and could lead to us terminating relationships with a supplier where we feel this is appropriate in order to protect ourselves and our customers.

We also have a policy statement published on our company website that outlines our approach to our responsibilities under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz [LkSG]).

### Our due diligence processes

Our due diligence in this area includes leveraging industry recognised platforms to maintain transparency in our supply chain. These systems enable the collection of comprehensive vendor information prior to their inclusion within our supply chain, alongside a requirement to adhere to our Supplier Code of Conduct. Our chosen third party due diligence tool is One Trust.

The tool enables us to carry out appropriate due diligence on vendors in our supply chain through our Group Technology Supplier Advisory and Monitoring Team and our Services Partnering team in core countries. One of the areas covered in the due diligence conducted focuses on human rights and modern slavery-related risk. This information is reviewed annually to ensure that it remains acceptable. The due diligence takes account of the risk profile associated with each supplier. We put in place the necessary actions to safeguard against modern slavery occurring within our supply chain.

Our due diligence extends beyond initial contracting with in-life checks and continuous adverse media screening taking place, as well as re-attestation of our Supplier Code of Conduct with current suppliers.

We plan to implement the tool in several locations in our smaller countries in 2025 and have undertaken significant preparation ahead of this during 2024.

Any issues relating to suppliers arising either prior to inclusion, or within life of a contract are referred to Group Compliance.

As we grow our business in India and Asia-pacific region we ensure that the above processes are adhered to with regards to protecting against modern slavery and other human rights violations in our supply chain.

### Our risk assessment and management

Due to the nature of our business, operations, and practices, we consider ourselves to be a low-risk enterprise as regards the potential for modern slavery or trafficking.

We have implemented a supplier risk assessment, which includes modern slavery, as part of our supplier onboarding process. Our risk assessment is based on the purchasing category of goods and services that the supplier is categorised in and an overall country risk analysis, based on a comprehensive Human Rights Country Risk Database that was created for us by external advisors.

## MODERN SLAVERY STATEMENT

In 2024 we undertook a Group Double Materiality Assessment which identified Impacts, Risks and Opportunities relating to Sustainability, this included workers in the value chain. This work also formed part of our preparation for compliance with existing and emerging disclosure obligations including the Corporate Sustainability Reporting Directive (CSRD) and adoption of the International Sustainability Standards Board (ISSB) International Financial Reporting Standards (IFRS) disclosure requirements in the UK.

Having undertaken a thorough internal review and audit of our global HR practices and policies we are satisfied that we are operating in compliance with all labour law and fair labour practices across our global employing entities. We therefore believe that there is an extremely low risk of modern slavery amongst our own employees.

Most of our suppliers are categorised as low risk in terms of exposure to modern slavery. Certain suppliers are deemed higher risk, based on internationally understood risks associated with the specific countries and industries they operate in.

Although certain parts of the electronics and manufacturing industry can be higher risk sectors for modern slavery, when we purchase hardware from original equipment manufacturers (OEMs), we work to establish that the companies we partner with have a comprehensive approach to the prevention of modern slavery and other human rights violations. Through our Partner Management relationships, we are satisfied that there is appropriate governance and oversight of these suppliers to reduce the risk within our supply chain.

Where we identify through risk assessment that we may have a higher risk supplier, the supplier appointment is escalated to Group Compliance for review and action.

### Key performance indicators

We continue to review our policies, practices and how we identify any risks of modern slavery and other human rights on a rolling basis as part of our continued commitment to ethical and responsible business practices. Group Internal Audit tests compliance with our policies.

We will continue with our commitment to ethical and responsible business practices, ensuring that if modern slavery is identified anywhere within our supply chain, we will not tolerate it.

<b>Group Ethics Policy, Supplier Code of Conduct and Speak Up (whistleblowing) policy review completed a minimum of once every two years</b>	100%
<b>% of employees that have completed 'Combatting Modern Slavery' e-learning in 2024</b>	93.7%
<b>% of employees completing 'Ethical Workplace Conduct' e-learning in 2024</b>	95.5%
<b>% of employees completing 'Anti-Bribery and Corruption' e-learning in 2024</b>	93.3%
<b>Number of reports or investigations into allegations of Modern Slavery or Human Rights concerns in 2024</b>	0
<b>Number of suppliers terminated due to Modern Slavery or Human Rights concerns in 2024</b>	0

As we grow our business in India and Asia-pacific region we ensure that the above processes are adhered to with regards to protecting against modern slavery and other human rights violations in our supply chain.

### Increasing awareness and training on modern slavery

We continue to provide our people with e-learning on 'Combatting Modern Slavery,' 'Ethical Business Conduct' and 'Anti-bribery and Corruption'. This supports our people in developing their understanding of these critical areas and provides guidance to them on ethical behaviours and subject specific "red flags" to look for. All our compliance e-learning contain a dedicated module on whistleblowing, ensuring that our people know where and when to report any concerns that they may have as well as the details of the independent external hotline being publicised internally through an annual multi-channel communications campaign. Our compliance trainings are reviewed annually and are updated, where required, to ensure they remain relevant, engaging and in line with any obligations that we have.

Making an effective contribution in this area is entirely the right thing to do for wider society and for our business and we will continue with our commitment to ethical and responsible business practices, ensuring that we do not tolerate modern slavery anywhere within our supply chain.

This statement was approved by the Board of Directors of Computacenter PLC on 14 March 2025 and has been published on our company website in accordance with the requirements of the Modern Slavery Act 2015.

**Mike Norris**  
Chief Executive Officer  
14 March 2025

Computacenter is a leading independent technology and services provider, trusted by large corporate and public sector organisations. We are a responsible business that believes in winning together for our people and our planet. We help our customers to Source, Transform and Manage their technology infrastructure to deliver digital transformation, enabling people and their business. Computacenter plc is a public company quoted on the London Stock Exchange (CCC.L) and a member of the FTSE 250. Computacenter employs over 20,000 people worldwide.



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