

GROUP ETHICS POLICY AND CODE OF BUSINESS CONDUCT



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A Message from Leadership

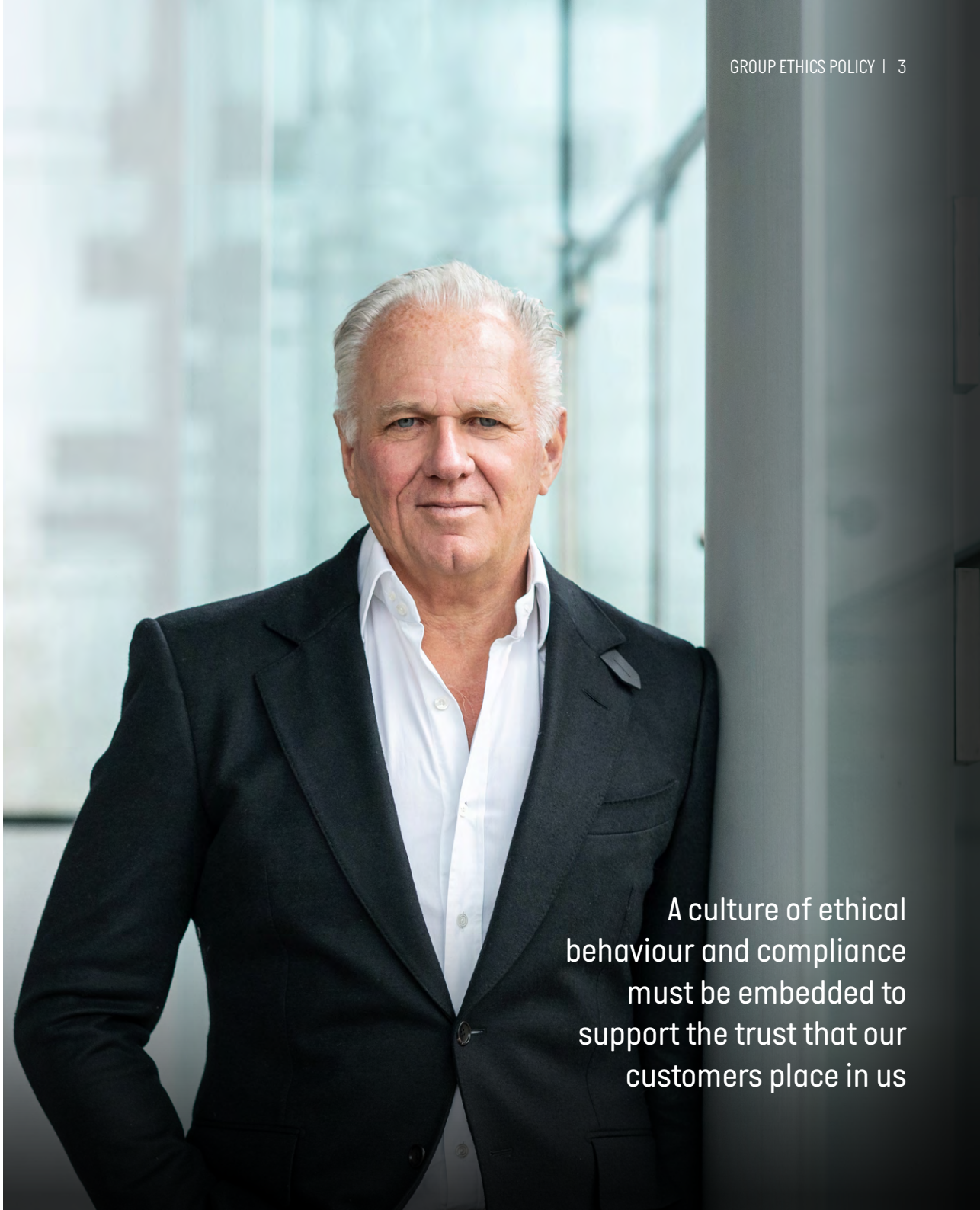
At Computacenter, we aspire to always win the right way, so how we conduct business matters. Our Group Ethics Policy and Code of Business Conduct (the "Code") is our commitment to the high standards of integrity, respect, trust, honesty, and fairness that we expect from ourselves and our business partners. It governs our business and provides clear guidance on how to act in an ethical and responsible manner. It reflects the values upon which this company was built and upon which we will continue to grow Computacenter, together.

Computacenter is a leading independent technology and services provider, and we are trusted by our large corporate and public sector customers to be a responsible and reliable business. Trust is one of our most valuable assets and ensuring that our customers' trust remains well-placed is fundamental to our continued success. Given the importance of our people in everything we do, that trust starts with you.

We believe that a culture of ethical behaviour and compliance must be embedded at every level within the organisation to support the trust that our customers place in us. It relies on each of us to follow the rules, act with integrity and speak out about misconduct or unfairness. No one person, department or leader can or should be responsible for maintaining a culture of ethics and compliance alone. As a Computacenter employee, you are bound by these ethical standards.

You have a responsibility and duty to uphold these ethical standards by following our Code. We encourage you to read our Code and use it to guide your actions and decisions. If you suspect a possible violation, speak up and report your concerns.

This policy is fully supported by Computacenter's Group Executive Committee.



A culture of ethical behaviour and compliance must be embedded to support the trust that our customers place in us

Our Commitment and Responsibility

At Computacenter, ethics and integrity are embedded into our culture through this Group Ethics Policy and Code of Business Conduct (the “Code”), and through our Winning Together Values (our “Values”). We know the importance of balancing our ethical obligations alongside growth and profitability to ensure that we carry out business in the right way.


We are also dedicated to conducting ourselves in accordance with applicable law in the jurisdictions in which we operate. Our uncompromising commitment to these principles is reflected in our industry longevity and, more importantly, our relationships with our people, customers, and partners. By committing to these ethical and legal standards as well as our Values, we not only strengthen our existing relationships, but also continue to build new relationships with those who share similar values and commitments.

We all have an obligation to act in accordance with our Code and our Winning Together Values in a way that is unwavering and consistent across the globe. Regardless of where you are located, or your role, it is your responsibility to ensure that your decisions and actions are aligned to this Code, our company policies, the law, and our Values.

This is our shared commitment and our expectation of you as an employee of Computacenter.

We expect you to adhere to these legal requirements without exception. More importantly, Computacenter holds you to a higher standard, in that we expect you to always act with integrity. This means your actions and behaviours should not only be guided by our legal obligations but should also be guided by your strong sense of moral principles. This includes being honest and making decisions with integrity, even when no one is watching.

If you engage in actions or behaviours that violate this Code and/or applicable law, you may be subject to fines, disciplinary action (up to and including dismissal) and potentially criminal liability.



This is our shared
commitment and our
expectation of you
as an employee of
Computacenter

Ethics and Our Winning Together Values

Computacenter is a people-centric company that depends on its people to deliver real value to its customers. We have a well-established culture, developed from the beliefs and strong direction of our founders and leaders.

Our Code is our ethical framework of standards, and it is aligned to our Winning Together Values. These are the values upon which we built this company and upon which we will continue to grow Computacenter. Together with the Code, our Values guide our decisions and our actions.

We win by:

Putting customers first

We work hard to get to know our customers, understand their needs and put them at the heart of everything we do. This lets us use our skills and experience to help them in the right way at the right time.

Keeping promises

We're straightforward, open, and honest in all of our dealings. We're pragmatic and do our very best to keep our promises. When that's difficult, we help our customers find other ways to solve their problems.

We do it together by:

Understanding people matter

We're committed to being diverse and inclusive. We build supportive, rewarding relationships and celebrate success. We're proud of the people we work with, and we treat people as we expect them to treat us.

Considering the long term

We're building a sustainable and efficient business for the long term. This leads our decisions and actions and helps people trust us.





Purpose, Scope, and Your Obligations

The purpose of this Code is to set out our expectations for our people and to guide you in performing your day-to-day responsibilities. Our goal is to ensure that your actions and decisions align with this Code, our Values, and the law. Our Code reflects who we are, what we stand for and what is important to us. While it is not an exhaustive list, it provides an overview of what we must do to act in an ethical manner while also complying with the laws and regulations that apply to us.

All employees, including permanent, full-time, part-time, temporary, and fixed-term employees, as well as Board members, Officers, and Directors (“Our People”) must follow the Code in spirit and letter when engaging in business activities.

The Code is a valuable resource for you. You must review all of this information carefully so that you will understand your obligations as well as how you can do your part to protect the company and its reputation, put our customers first, promote a healthy corporate culture, and act with integrity.

You should raise a concern as soon as possible if you believe or suspect that a violation/conflict with this Code has occurred or is likely to occur in the future. Also, “turning a blind eye” deliberately is not acceptable and may be tantamount to a violation.

Upon reviewing this Code, if you have questions or need to report a violation of this Code, company policies, or the law, you can contact your manager, HR business partner, the Group Legal and Compliance team or via our Speak Up process, as soon as possible.

In accordance with Computacenter’s Speak Up policy, all concerns will be treated in confidence. We seek to encourage openness and will support all concerns raised genuinely and in good faith under this policy, without fear of retaliation.

[> view our Speak Up policy](#)

PUTTING CUSTOMERS FIRST

Anti-Trust and Competition Law

We act fairly in our business dealings

It is against our policy and the laws of many countries for you to engage in anti-competitive practices and activities. Illegal anti-competitive activities include agreeing with competitors to divide territories, customers, suppliers, or markets. This also includes (but is not limited to) bid rigging, collusion, and price fixing.

Anti-competition stifles competition in the free market, it fragments business, and it affects growth in innovation. Lesser competition typically results in higher prices for lower quality products and services. This may also lead to larger companies dominating the market, resulting in smaller companies being pushed out of the market or being unable to compete fairly against larger companies. Competing fairly ensures that we meet our business objectives with our integrity intact. Further, healthy competition and fair business practices enables us to put our customers first by giving them access to a variety of "best in quality" resources at fair competitive prices.

At Computacenter, we are committed to the rules of fair competition. You are not permitted to engage in anti-competitive behaviour, and you must not allow any member of the Computacenter Group or any third-party organisation working for us to engage in them.

Anti-Bribery and Corruption

We do not tolerate any form of bribery or criminal activity in our business

Computacenter is committed to complying with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act of 2010, the Foreign Corrupt Practices Act (FCPA), and all other applicable anti-bribery and corruption legislation wherever we do business. As such, we have a singular global approach to anti-bribery and corruption: we do not offer bribes, we do not accept bribes and we will not be solicited for bribes, even in jurisdictions where these activities may be permissible by law. Computacenter has a zero-tolerance policy towards bribery and corruption and all forms of bribery and corruption are unacceptable and prohibited as per our Group Anti-Bribery and Corruption policy.

It is imperative that you read and comply with the Group Anti-Bribery and Corruption policy which states, in part, that in conducting your daily activities you are prohibited from offering or receiving bribes. A bribe is the offering, giving, or receiving "anything of value" which improperly influences a decision or action. "Anything of value" is much broader than monetary gain; it can include tangible items such as gifts, entertainment, accommodations, or job opportunities. It is irrespective of its financial value or whether it is of any value to the recipient.

In accordance with the Group Anti-Bribery and Corruption policy, prior written approval by a senior manager is required when providing or receiving gifts, hospitality and entertainment over a certain value and recording this in the appropriate Gifts & Hospitality Register. In addition, you must maintain accurate books and records in compliance with Company policy and applicable laws, which prohibit concealing or knowingly falsifying business records. Failure to comply compromises the integrity and validity of our recordkeeping and could subject both you and the company to serious penalties or even criminal liability.

We have strict policies regarding third party gifts or benefits as it relates to government officials, charitable or political contributions and prohibited activities. For detailed information and guidance, you must read the Group Anti-Bribery and Corruption policy, and The Golden Rules to Anti-Bribery and Corruption.

> [Anti-Bribery and Corruption policy](#)

> [Golden Rules to Anti-Bribery and Corruption](#)

> [Gifts & Hospitality Register](#)



Trade Compliance

We respect and follow the applicable laws of each country when we export and import

As a global organisation, we comply with all legislation governing transactions with certain countries, products, and individuals. Such transactions may be restricted or subject to embargoes, blocked lists, terrorist lists, dual-use merchandise, and end use or resale to third parties is subject to approval. It is a violation of trade regulations to engage with partners who are subject to these restrictions.

If your role requires you to be engaged in trade activities, you must adhere to all relevant legislation and our trade compliance policies.

Anti-Money Laundering and Anti-Fraud

We do not tolerate criminal activity of any kind in our business, including money laundering and fraud

Money laundering occurs when money is obtained through illegal activities or converted to a legitimate source in an attempt to disguise the illegal origin of the funds. It is illegal to facilitate activities involving money laundering and other criminal activities.

Fraud is the deliberate and dishonest use of deception to obtain an unjust illegal gain, or cause loss or risk of loss to another [usually financial]. Fraudulent acts include forgery of documents, misappropriation of funds, suppliers or assets and improperly reporting of money or financial transactions.

You are required to comply with our Anti-Fraud policy. If you are engaged and/or responsible for payment activities, you must be diligent to ensure that Computacenter does not become involved in money laundering or fraudulent activities, and provide accurate descriptions in your recordkeeping.

[> Anti-Fraud policy](#)

KEEPING PROMISES

Ethical Conduct

We conduct ourselves with honesty and integrity

As a global organisation, wherever we are located, we are united in acting with honesty, integrity, and in alignment with our Values. We are committed to high ethical standards in the conduct of our business activities, and we are dedicated to responsible and sustainable corporate management. As a representative of our company, we expect you to abide by this Code, our company policies, and the law. Integrity in business is non-negotiable.

When conducting business activities, you should follow this Code, and particularly:

- Treat everyone with respect and dignity.
- Be open, honest, and ethical in your business relationships.
- Act with integrity and professionalism.
- Comply with the law.
- Avoid actions which could damage our reputation.
- Refrain from bullying, harassment, or discrimination.

Conflicts of Interest

We avoid conflicts between private and professional interests

An actual or potential conflict of interest occurs when there is activity or a relationship outside of work that is competing with your loyalty or commitment to Computacenter. Recognise when these conflicts of interest arise and understand the actionable steps you need to take to avoid or manage them.

When making decisions related to or that affect Computacenter, you have an obligation to act in the best interest of the company. You must also avoid even the appearance of a conflict. If you engage in personal activities, investments, interests, associations or even a second job, which could compromise or appear to compromise your objectivity or commitment to Computacenter you must disclose this.

Disclosure and transparency are key. We expect you to be proactive and disclose actual or even potential conflicts of interest to your manager for approval. Many conflicts of interest can be managed, but only if you are forthright in disclosing them.





Third Party Partners and Suppliers

We hold our partners to high standards and work responsibly with them

We ensure that our working relationships are professional, open, honest and adhere to the principles of fair business practices. This includes our people, customers, partners, suppliers, and anyone with whom our suppliers have business dealings. How our supply chain behaves is important to us and to our customers. To ensure that we are working with suppliers whose values and business practices align with ours, we conduct appropriate screening and require them to comply with our Supplier Code of Conduct.

When you engage with our suppliers, you are expected to do your part by holding them accountable and report those who engage in unethical or illegal behaviour or violate Computacenter policies.

Confidential Information and Intellectual Property

We protect our confidential information and intellectual property and respect the intellectual property rights of others

Protecting our company's confidential information is a serious matter. You have an obligation to keep confidential the data that you come across in your job, and to dispose of it properly. Confidential data should only be used for purposes of fulfilling your role and must not be shared inappropriately with third parties or colleagues. This commitment extends to trade and business secrets as well.

Computacenter's intellectual property is a valuable asset of the company. We protect and defend our rights in order to maintain our competitive advantage. Intellectual

property rights include, but is not limited to; copyrights, trademarks, trade secrets, service marks, patent rights, utility model rights and design rights. Unauthorised use of our intellectual property is a violation of company policy.

We also respect the intellectual property rights of others, and further do not condone product piracy or plagiarism.

If you believe that someone is using the Company's or a third party's intellectual property in an unauthorised manner or engaging in product piracy, plagiarism or believe that you have created any intellectual property in the course of your job, contact Group Legal and Compliance so that we can consider registering it.

[Supplier Code of Conduct](#)

Data Protection

We are committed to protecting personal data that has been entrusted to us

Computacenter recognises the importance of protecting personal data in compliance with global privacy requirements, including the General Data Protection Regulation (GDPR). We understand the trust placed in us by individuals and customers who provide us with their personal data and are committed to ensuring that all personal data is processed lawfully, fairly, and transparently. This includes ensuring that individuals are informed about the purposes for which their data is being processed and that their rights are respected throughout the entire data processing lifecycle.

You are required to comply with our comprehensive Data Protection policy, which is designed to comply with GDPR regulations and all applicable data protection laws, and which sets out the standards that all employees, contractors, and third-party processors must adhere to when handling personal data on behalf of our company. This includes our obligations with respect to data subject rights, data breach notification and data protection impact assessments.

We believe that data privacy is a fundamental human right, therefore you must ensure that all personal data is treated with the utmost respect and care and that our data processing activities are conducted in a manner that is ethical, responsible, and compliant.

Social Media

We communicate responsibly and protect our reputation

Computacenter respects and understands its obligation to protect the company's confidential information and that of its customers, partners, contractors, and our people.

Unless you have been granted authority in your role or Computacenter has authorised sharing company-related information, you are strictly prohibited from speaking on behalf of the Company using social media. If you post on social media, be responsible and understand the impact of what you share. If you are not officially authorised to represent the Company's view, you must be clear that you are speaking strictly on behalf of yourself and that your opinion does not reflect the opinion or position of Computacenter.

Social media includes, but is not limited to, social networking sites, blogs, vlogs, online forums, communicating via email, written form or even conversations.



Insider Trading

We do not trade on insider information

Insider trading is when you buy or sell Computacenter plc shares when in possession of non-public information, which if released publicly is likely to cause the price of Computacenter plc shares to go up or down.

Computacenter has a zero-tolerance policy towards insider trading, which is illegal. You are prohibited from engaging in or supporting insider activities. Insider trading adversely affects the market by making it more costly for investors, it creates the perceptions of an unfair market advantage and affects public confidence and our reputation. You must not trade when in possession of inside information and you must not assist, facilitate, or encourage anyone else (either inside or outside of the organisation) to do so.

You may have access to information (which may include, but is not limited to, significant contract awards or losses; profit performances or forecasts which are stronger or weaker than external market expectations; or mergers and acquisitions; or significant corporate activity, such as share buybacks).

If it is considered likely that you will have access to inside information as and when it arises as a result of your role, you will be designated as an 'insider' and will be subject to additional restrictions concerning when you may trade in the Company's shares. You will be notified by the Company Secretarial Department if this is the case and will be asked to confirm that you are aware of and understand the Company's Rules on Share Dealing.

Tax Evasion

We have a zero-tolerance approach to all forms of tax evasion

Computacenter commits to paying all taxes due in jurisdictions where it operates and takes a zero-tolerance approach to any activities that would cause Computacenter to evade tax or facilitate tax evasion by third parties. Causing or facilitating tax evasion is a violation of company policy and tax evasion is also illegal. You are not permitted to take any actions, nor enter into any transactions which cause you or Computacenter to evade tax or facilitate tax evasion by any third party.

You are required to report any activities that may lead to a violation of this policy requirement and should do so by either notifying Group Legal and Compliance or by using Computacenter's confidential whistleblowing provider, Safecall.

In addition to the above, Computacenter commits that it shall not conduct its business activities nor structure itself in a way that is designed solely to avoid paying tax that would otherwise be due.

UNDERSTANDING PEOPLE MATTER

Diversity and Inclusion

We strive for a culture of belonging

We strive to create a culture where everyone feels that they belong and can be themselves. We are an organisation where people are valued, respected, and supported to reach their full potential.

We will continue to foster an environment which enables our people to speak openly and ensure they have the knowledge they need to promote a positive and inclusive environment for all.

For us, diversity means making sure that all our systems and processes, and our organisational culture, allow us to attract, retain and promote diverse talent. We recognise the differences, strengths, gaps and experiences our people have and then work to support them to develop their skills and careers to be the best they can be.

As a global based organisation, we have our footprint in many parts of the world, serving an equally diverse customer base. We know that having diverse teams working together gives us a competitive advantage and helps us to better reflect and understand our colleagues, customers, and partners.



Human Rights and Labour Standards

We support and respect the internationally recognised human rights of all people

At Computacenter, we stand by our Values when we say, "People Matter." We will not tolerate, or be complicit in, human rights violations or abuses, and we hold our suppliers and partners to the same high standard. This includes modern slavery, or violating fair labour, child labour and wage practices.

Engaging, supporting, or promoting human trafficking is illegal, against our policy and immoral.

Our approach to human rights and labour standards means that we have adopted the principles of the UN Global Compact, the Universal Declaration of Human Rights, the UN Conventions on Rights of the Child, and the International Labour Organization.



UN Global Compact Principles

Accordingly, we have adopted the following and believe that our suppliers should do the same.

- Adhere to local and national laws.
- Provide wages, benefits and conditions of work that are just and fair with transparent payment terms, and which are sufficient to satisfy the basic needs of workers and their families.
- Prohibit violence, harassment, and intimidation.
- Prohibit the use of worker-paid recruitment fees or bonded labour.
- Prohibit compulsory overtime.
- Prohibit all forms of child labour.
- Prohibit discrimination.
- Prohibit confiscation of workers original identification documents.
- Provide access to remedy, compensation, and justice for victims of modern slavery.
- Ensure that workers are free to terminate their employment.
- Ensure workers have freedom of movement.
- Ensure that working hours comply with national legislation and applicable international guidelines.
- Ensure workers have freedom of association and the right to collective bargaining.
- Have in place speaking-up/whistleblowing and grievance procedures so that workers can communicate regarding working conditions without fear of reprisals.
- Comply with any applicable "hidden worker" or similar legislation.

These are examples of non-acceptable practices but our approach to human rights and labour standards is not limited to this list.

It is important for you to understand this policy and act in a way that supports this, particularly when working with our suppliers. We expect our suppliers to share this commitment to combat human trafficking practices where they source goods, materials, and services. Furthermore, we expect you to report when you suspect a violation of human rights in connection with our business (see 'Reporting Concerns and Speaking up' on page 19 of this policy).

Non-Discrimination

We promote an ethical workplace and will not accept discrimination

We have a zero-tolerance approach to discrimination that extends to all aspects of the employment relationship, including, but not limited to, hiring, promotions, working conditions, compensation, and benefits. We strongly believe in and work to create an environment of equal opportunity for all and build equity by recognising the differences, strengths, gaps and experiences our people have and then work to support them to develop their skills and careers to be the best they can be. All such decisions are made by using objective standards based on the individual's qualifications and experience as they relate to the particular job.

All our people should be free to be themselves and not fear differential treatment in the workplace because of their personal characteristics including (but not limited to) race, colour, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, pregnancy, citizenship, genetic information, socio-economic status, union membership, caste or any other personal characteristic, or any trait or status that is protected by law (which may vary from country to country).

We will actively work to reinforce this and will not tolerate discrimination or other unacceptable behaviour that contradicts this, regardless of whether this is real or perceived. You must respect and protect the rights of others by not engaging in discriminatory or unfair treatment of others and have an obligation to speak up and report others who engage in discriminatory, unfair, or abusive practices.

Anti-Harassment

We maintain a positive work atmosphere where all are treated with mutual respect

We have zero-tolerance policy when it comes to harassment and believe that no one should be a target of harassment, either by a manager, colleagues or even third parties or customers.

Harassment (in some countries referred to as mobbing) includes, for example:

- Giving nicknames to people that are unwanted and/or capable of being connected to a perception of someone, slurs, or negative stereotyping
- Threatening, intimidating or hostile acts
- Degrading jokes and/or 'banter'
- Producing and/or sharing written or graphic material that degrades, affects someone's dignity, or shows hostility or aversion toward an individual or group

Workplace bullying can include:

- Verbal, written or electronic bullying: slandering, ridiculing, or belittling a person or their family; persistent name calling that is hurtful, insulting, or humiliating; using a person as butt of jokes; and abusive remarks
- Gesture bullying: non-verbal threatening gestures, or glances which can convey threatening messages
- Exclusion: socially or physically excluding or disregarding a person in work-related activities

If you believe that you are a victim of harassment either physical or verbal, or you witness it, we want you to report the incident immediately to your manager or via our Speak Up process.

Workplace Violence

We have zero-tolerance policy when it comes to acts of threats of violence

Violence in the workplace includes verbal and physical threats of harm. You are prohibited from bringing weapons on the Company site or customer sites.

If you witness or are a victim of workplace violence, report the situation immediately to your manager or via our Speak Up process. For threat of violence that puts you or others at serious risk, contact the local authorities immediately and then inform Computacenter as soon as practically possible.

Safety in your Workplace

We take steps to create a safe secure workplace for everyone

At Computacenter, people matter, and we prioritise a safety-first work culture. We are committed to providing a safe working environment that supports accident prevention and minimises exposure of our people to health risks and hazards. These health risks exposure include maintaining a smoke and vape free work environment for our people which means that both smoking and vaping is only permitted in set areas of our premises.

Complying with applicable industrial, health, safety, and environmental standards is critical to our business. You must take all necessary measures to comply with our health and safety policies and procedures. Report all workplace safety concerns or incidents to your designated health and safety officer, including anything that could lead to a violation of the law, regulations, or our policies.

Substance Abuse

We care about your health and safety

You are responsible to ensure that your performance is not impaired due to alcohol, drugs, or medication. This is irrespective of whether the taking of the substance is legal or not.

Moderate consumption of alcohol on Computacenter premises or those of a customer or business partner is only allowed in exceptional circumstances. For example, this could include team celebrations, project completion, organised Computacenter staff events, or when a customer or business partner invites you to an event involving moderate consumption of alcohol on special occasions. If you are unclear when this may be, please speak to your manager. Be aware that you remain responsible for your actions after consuming alcohol.

You are strictly prohibited from consuming or possessing illegal drugs on Computacenter premises or on those of a client or business partner.

If you are concerned about drug, alcohol, or medication dependency, we encourage you to seek professional medical advice or contact HR for information and resources available to you.

CONSIDERING THE LONG TERM

Sustainability

We are committed to environmentally sustainable practices

In order to deliver against our Winning Together Values, we must adopt sustainable practices, and have organised our sustainability strategy into three areas: People, Planet, and Solutions.

Across all the countries and territories where Computacenter operates, we have a commitment to minimising our ecological footprint for our people, planet, and global communities. We are taking tangible steps to measure and mitigate our environmental impact and secure sustainable business practices for the long-term. Our commitment to sustainable operations puts longevity in the driving seat with policies and practices aimed at safeguarding our business, people, and environment against risks, known and emerging. This includes recognising and understanding our environmental impact within our operations and practices as well as understanding how we can further our efforts in this area.

We expect you to do your part to support our sustainability strategy by adopting environmentally sustainable practices in your daily business activities including recycling, conserving power, and water, reducing waste, and actively reporting violations of our policy or the law. We also encourage you to seek out partners and customers who are environmentally responsible and who align with our sustainability strategy.



Sustainability strategy





Land, Forest, Water Rights and Forced Eviction

We are committed to the protection of human rights

Computacenter supports the protection of human rights especially when it comes to unlawful eviction and the prohibition of unlawful taking of land, forests and water in the acquisition, development or other use of land, forests, and waters.

Computacenter believes in supporting the rights of others to have access to water and sanitation. You must do your part to abide by this and ensure that we are working with suppliers, business partners and customers that seek to avoid any impacts to land, forests, or water in areas where they operate and, if not feasible, they should adopt mitigation measures that remedy the impact. This includes avoiding forced evictions or resettlement of any acquired land for their operating activities.

Reporting Concerns and Speaking Up (Whistleblowing)

We encourage and promote a 'speak up' culture. If you see something, say something.

We want you to speak up if you have a concern, as soon as possible, over any activity by Computacenter, our people, or our representatives that you believe in good faith is in breach of this Code or relates to wrongdoing by Computacenter. Reportable offences also include suspected criminal activity or misconduct that may damage our business, reputation, or brand. No one person is responsible, collectively we each have an obligation to report. Also, "turning a blind eye" deliberately is not acceptable and may be tantamount to a violation.

You can report your concerns to the following:

- A manager
- A member of the HR Team
- The Group Chief People Officer
- The Group Legal and Compliance Director
- Any member of the Group Legal and Compliance management team
- Via Safecall (available 24/7, 365 days a year)

Each of the parties listed above has an obligation to keep the information reported and the identity of the whistleblower confidential. Once a report is received, we will conduct a prompt, independent and impartial review of the matter, and if necessary, take appropriate measures to resolve or correct it. Managers have an obligation to report concerns.

Note that you also have the right to communicate or report your concern to the appropriate regulatory agencies directly.

Non-Retaliation

Computacenter does not tolerate retaliation against anyone who in good faith raises concerns or questions regarding a potential violation of the law or Computacenter policies. You are strictly prohibited from retaliating against anyone who makes a good faith complaint or assists Computacenter in an investigation of misconduct, a legal violation or any potential violation.



Safecall

Safecall is our independent whistleblower hotline, which you can call 24 hours a day, 365 days a year. Any reports submitted will be treated with confidentiality and anonymously if you choose.

Contact Safecall using the phone numbers listed [here](#), via email at computacenter@safecall.co.uk, or by submitting a report at www.safecall.co.uk/report

For more information, including details about using Safecall and how to report specific types of concerns, see our Speak Up policy.

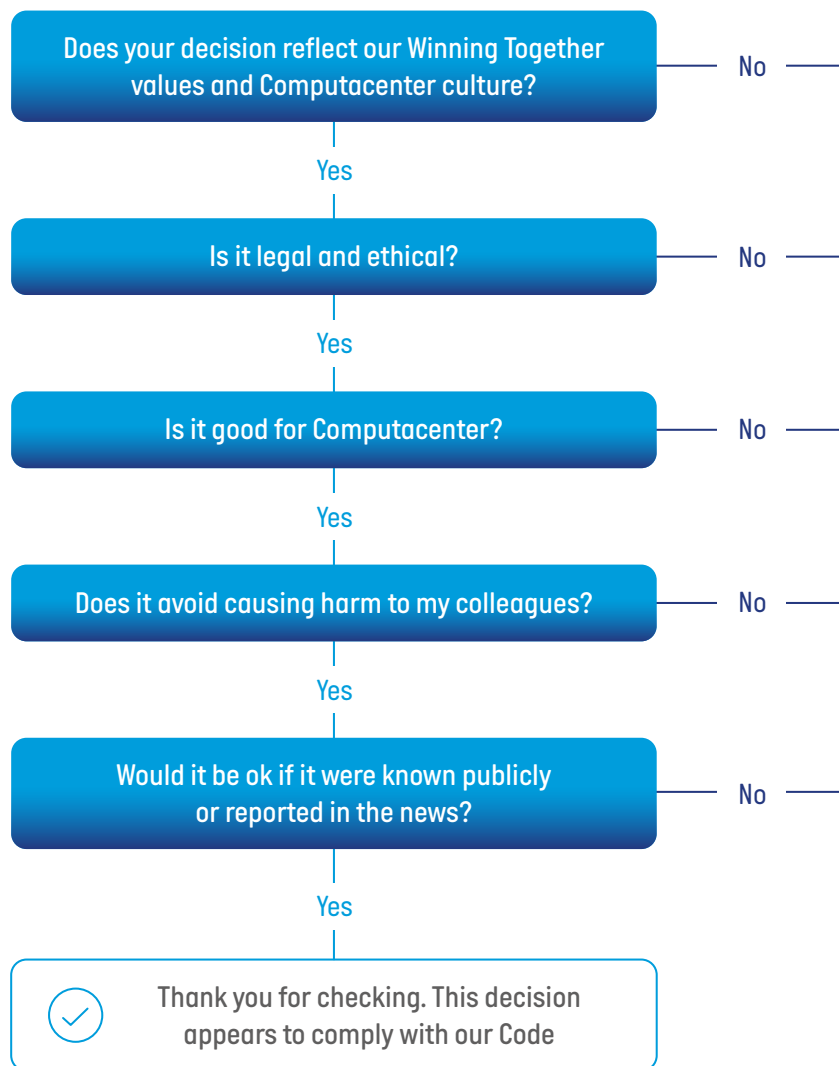
 [Speak Up policy](#)

Ethical Decision Tree

If you have a question about whether a particular business activity aligns with this policy, use the Ethical Decision Tree Logic to guide you on the right path here.

For further assistance, contact Group Legal and Compliance at mb.compliance@computacenter.com

> ONE CC - Group Legal and Compliance



If you cannot answer with a resounding **"Yes"** to all of **these questions**, it's time to talk with your manager, or consult with the Group Legal and Compliance team for guidance.



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Computacenter is a leading independent technology and services provider, trusted by large corporate and public sector organisations. We help our customers to Source, Transform, and Manage their IT infrastructure to deliver digital transformation, enabling people and their business. Computacenter is a public company quoted on the London FTSE 250 [CCC.L] and employs over 20,000 people worldwide.