

Third Party Code of Conduct

Introduction

At Westcoast, we are relentless in our pursuit of excellence when it comes to serving our customers and building strong and successful relationships of trust with all of our suppliers.

Since its establishment in 1984, the Westcoast Group has thrived to become the largest privately held business in the Thames Valley region, consistently ranked in the Sunday Times Top Track of the 100 Largest Privately-owned UK Companies. This success is thanks to the hard work and dedication of our staff and has led to Westcoast becoming the number one IT distributor for many of the World's best-known IT brands.

Inbuilt into the company ethos that drives us forward is our commitment to ensuring everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way. As part of this, it is important to us that our customers and suppliers feel the same way so that we can ensure that the relationships we build have long-term sustainability.

To help us achieve this, we are committed to adhering to the following Code of Conduct (**Code**) and expect all **Third Parties** (defined below) associated with Westcoast to take the necessary measures to ensure that they are also compliant in upholding the universal principles and standards contained within the Code. For the purposes of this code of conduct, the term Third Parties includes, but is not limited to, any customers, suppliers, agents, sub and independent contractors, consultants and others, as may be prescribed from time to time, who work with, or on behalf of, Westcoast.

Our Policies and Standards

Health and Safety

We are committed to ensuring the health, safety and welfare of all of our employees, and others who interact with Westcoast. As such, we insist on compliance by Third Parties with the following processes:

- Take all reasonable measures to comply with all relevant occupational health and safety laws and regulations
- As far as is reasonably practicable, maintain a safe and healthy work environment, with adequate facilities and arrangements for the welfare of employees and others who enter the workplaces. This should be achieved through taking action to manage and minimize the causes of workplace hazards in order to prevent accidents, injuries and work-related illnesses to staff and visitors
- Take reasonable action to reduce the risk of hazards in work that is carried out by contractors, within the workplace, to ensure the safety of employees, visitors and the contractors
- Conduct regular training with employees on all relevant aspects of health and safety to enable them to carry out their roles in a safe manner, protected from hazards and preventing them from causing harm to others during the conduct of their employment
- Prohibit the use or possession of alcohol or recreational drugs in the workplace

Employment and Human Rights

Westcoast support and respect the protection of internationally proclaimed human rights and strongly advocate the principle of all workers being treated with dignity and respect. As part of these beliefs,

Westcoast firmly objects to (i) the use of child labour and (ii) any behaviour amounting to sexual harassment, in any circumstances. To help ensure we build relationships that are ethically and morally sustainable, we insist that Third Parties join us in adhering to the following:

- Take all reasonable measures to comply with all relevant human rights laws, regulations and guidelines to ensure that neither the company nor its employees are complicit in any abuse of human rights
- Not employ any child under the age of 16, even if applicable national laws or regulations allow children between the ages of 13-15 to perform light work
- Respect the rights of employees to freely and voluntarily establish and join groups for the promotion and defence of occupational interests, and engage in good faith with such groups, or designated representatives in consideration and agreement of employment matters
- Not discriminate in hiring and employing workers on the basis of race, caste, birth, social or ethnic origin, religion, nationality, age, gender, gender identity or expression, material status, sexual origination, disability, maternity, union membership or political affiliation
- Train employees to consider the effect of their actions and behaviour on others, and the reputation of the business, and encourage them to embrace the principles of respectfulness, equality and diversity
- Comply with the respective national laws and regulations regarding working hours, wages and benefits and ensure that employees are able to give their informed, freely given consent to any lawful deductions
- Provide a safe and supportive environment for employees to report any incidents of concern, including but not limited to acts of discrimination or sexual harassment that they have experienced or witnessed.
- Conduct a thorough investigation of any reported incidents of concern and implement a zero-tolerance approach to any discriminatory or harassing behaviour identified. All reasonable measures must be taken to prevent a reoccurrence of any employee, of the company or their group, being exposed to any discriminatory or harassing behaviour.

Environment

As part of our commitment to being a good corporate citizen, Westcoast are supporting the UN Global Goals which include several targets relevant to our business, such as:

- Sustainable use of natural resources
- Responsible management of waste
- Substantially reduce waste generation
- Adopt sustainability practices and reporting

Westcoast aim to achieve net zero across our supply chain, which includes Scope 3, by 2050 through working with external advisers to implement procedures to ensure this is achievable. We are also committed to working with Third Parties to help reduce their own carbon (scope 3) emissions and to promote their most environmentally friendly products and initiatives.

To help us achieve our goal to become the most environmentally sustainable business we can be, we request that Third Parties join us in taking all reasonable measures to comply with all relevant environmental laws, regulations, guidance and standards. In addition to this, we ask that Third Parties ensure that their own environmental and sustainability policies and initiatives comply with ours, as detailed below:

- **Responsible use and recycling of packaging** – All of our warehouse and office locations have dedicated waste recycling programs that cover a wide range of products, packaging, and waste products, with every effort being made to reuse existing packaging in the implementation of the services that we offer.
- **Energy consumption and use at Westcoast facilities** – Through active negotiation with our energy suppliers Westcoast is striving to achieve carbon neutral supplies across all of our sites. We have also invested in PV (photo-voltaic) panels at one of our sites to supplement the purchase of offsite 'green energy'.
- **Fuel use in the delivery of Westcoast products** – We are working with courier partners regarding their green energy policies and having measurable targets in place, with the use of electric delivery vehicles being encouraged wherever possible. Westcoast are also working hard to reduce delivery frequency through order consolidation and our offering of direct shipment to end users minimises the double handling of shipments.
- **Recycling and secure disposal of used products** – In compliance with the WEEE Regulations, Westcoast utilises the services of a Westcoast group company, WAM Europe Limited, to facilitate the disposal and recycling of waste electronic goods used within our own business and we are engaging with third party suppliers to initiate an offering of full IT Asset Disposal services for customers.
- **Employee Initiatives** – Westcoast actively promotes the effective and efficient use of communication software as an alternative to in-person visits to Third Party sites as a result of the environmental benefit of reduced travel. The provision of a cycle to work scheme encourages greener means of travel by our employees.

Throughout all aspects of our business, we implement effective systems to identify and eliminate potential hazards to the environment and expect the same from Third Parties.

Export Control

The products, software and/or services sold by Westcoast (**Goods**):

- Are presumed subject to U.S. export control requirements, in addition to any other applicable countries' requirements; and
- Must not be provided to any sanctioned or restricted persons, countries, or uses unless authorized by the U.S. government.

Third Parties purchasing Goods from or selling Goods to Westcoast must:

- Understand and comply with the U.S. export control laws and regulations applicable to the Goods (where applicable) including any special restrictions;
- Obtain any required licenses or other government authorizations as needed to the use, transfer, import, export, or re-export of Goods;
- Not cooperate with any restrictive trade practice or boycott that is prohibited or penalized under U.S. or applicable local laws; and
- Understand and comply with applicable import and export control laws and regulations of other countries.

What is prohibited under the U.S. Export laws?

Goods cannot be sold to Prohibited Countries, Prohibited People and Entities or used for Prohibited End-Uses (each as defined below).

Prohibited Countries: Goods cannot be sold directly or indirectly through a third party to prohibited countries or to a prohibited country's Embassy or Consulate (wherever located) without a US government license or other official authorization. The current list includes North Korea, Cuba, Iran, Sudan, Syria, Crimea, Russia, Belarus, Donetsk & Luhansk regions in Ukraine.

Prohibited People and Entities: Specially Designated Nationals and Blocked Persons ("SDN List"), Other individuals and entities on other U.S. government screening lists (such as the Entity List), Terrorists, Drug Traffickers, Proliferators of Weapons of Mass Destruction, Criminal Organizations.

Prohibited End-Uses: Nuclear Technology, Missile Technology – includes space exploration activities and unmanned aerial vehicle (UAV or drone) activities, Chemical or Biological Weapons, Maritime Nuclear Propulsion, Military End Uses, Weapons of Mass Destruction, Certain activities related to oil and gas exploration and production (Russian transaction related).

Anti-Bribery and Corruption

At Westcoast, we value our reputation for ethical behaviour and reliability and, as such, recognise that any involvement in bribery, corruption, extortion, money laundering or embezzlement is unconscionable and strictly prohibited. We strongly believe that good ethics are of the utmost importance to ensure that our organisation meets not only its objectives in a fair and equitable manner but also our wider social responsibilities. As a result of this, we are committed to ensuring high ethical standards within the workplace and expect the same from Third Parties. This is achieved through our compliance with the following principles and, to ensure that we are forming working relationships with ethical and reliable partners, we insist that Thirds Parties commit to doing the same:

- Take all reasonable measures to ensure compliance of the business and its representatives with all applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations. This includes the provision of ongoing training to ensure that all employees have a sufficient understanding of the policies to which they are expected to adhere
- Implement, maintain and communicate sufficiently clear policies which prohibit any and all forms of bribery, corruption, extortion, money laundering, tax evasion and embezzlement by employees or any persons associated with its business
- Conduct transparent business dealings, and accurate record keeping of these, to ensure that relevant compliance standards are met
- Never, directly or indirectly, offer, authorize, give or receive bribes or improper payments to any third parties to improperly influence the obtaining of new business, retention of existing business, or to secure any improper advantage over others
- Report any signs or concerns of unethical behaviour, or engagement in any acts of bribery or corruption, in relation to any personnel, representatives or a partner through the appropriate channels and ensure that all employees are aware of the correct procedure to follow for doing the same

Tax Compliance

Westcoast takes its duties and responsibilities under the Criminal Finances Act 2017 (CFA 2017) seriously, including the obligation to prevent tax evasion. Fundamental to this is our commitment to not commit, cause, facilitate or contribute to any deliberate underpayment of taxes that are due, a

commitment which we expect to be echoed by Third Parties in relation to their own business and any third parties with whom they deal by:

- Ensuring that through no act or omission does the business, or anyone associated to it, commit, cause, facilitate or contribute to the commission by any person (including those associated to the business' customers as well as itself), of a (i) corporate failure to prevent offence, (ii) UK tax evasion offence or (iii) foreign tax evasion offence (all as defined under the CFA 2017) in connection with the provision of the goods and/or services provided.
- Paying in full and a timely manner, all taxes due and payable relating to all monies, remuneration, profit and value received or payable in connection with the provision of relevant goods or services
- Advocating transparency with tax authorities about the business's transactions and correctly declaring to them all income in line with the requirements under the applicable tax laws and regulations
- Immediately notifying any potentially affected parties where there are concerns regarding any action taken by employees, contractors or agents in relation to dealings with that party, or where it is suspected that another party in the relevant supply chain may have engaged in tax evasion

Data Protection & Privacy

Westcoast is committed to high standards of information security, privacy and transparency in compliance with all applicable data protection legislation and we expect the same from Third Parties. We believe that we can achieve this together via adherence to the following:

- Take all reasonable steps for the business and its employees to comply with all relevant data protection laws, regulations and guidelines
- Take all appropriate technical, organisational and security measures to prevent unauthorised or unlawful processing, accidental loss, destruction of or damage to any personal data transferred to them
- Implement, maintain and communicate sufficiently clear data protection policies and, if necessary, provide training to ensure that employees have sufficient understanding of the policies and expectations of them under these policies
- Conduct due diligence checks in relation to any third party who may be processing personal data on behalf of the business
- Promptly notify the relevant other party of any data protection incidents that arise in relation to the personal data that is being processed on their behalf
- Data controllers must ensure that any data collected is only done so for specific, legitimate and explicit purposes with sufficient checks then being conducted to ensure the accuracy of the data prior to it being passed on for processing. The data processors must then ensure that all data is processed lawfully, fairly and in a transparent manner.

Product Safety and Quality

A fundamental part of the excellent customer service that Westcoast strives to achieve is our ability to deliver the highest quality goods and services possible to meet our customers' needs. To help us maintain these high standards, we ask that Third Parties support the quality checks that Westcoast already conduct by complying with those measures below which are relevant to them:

- Every product sold to Westcoast must be safe for use in its intended purpose and have been tested for compliance with all the relevant standards and regulations associated to it.

- All products delivered to Westcoast should be marked with the CE and UKCA markings to evidence that the products have passed the relevant compliance testing for sale on the EU and UK markets.
- Upon request, relevant legally required product safety documentation is to be made available to Westcoast.
- If there are any concerns or evidence as to a product being unsafe or not complying with the applicable standards for that product, these should be reported immediately to Westcoast who will in turn report this to the supplier so that further investigation, and any rectification action deemed necessary, can be actioned.

Compliance with this Code

Third Parties should communicate the principles in this Code to its subcontractors, employees and other business partners who are involved in the supply and receipt of any products and services relating to Westcoast. These business partners and associates should also be motivated to adhere to these same standards and take action to monitor performance.

We expect openness and transparency in our relationships with Third Parties. Transparency includes maintaining documentation necessary to demonstrate compliance with these principles. Westcoast may exercise its relevant contractual rights to access this documentation and raise reasonable enquires.

Unethical business practices will be reported. Whatever criminal violations of laws are suspected, these should be reported to the appropriate authorities for possible prosecution, with any other violations being reported, investigated and dealt with suitably.

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