

**Westcoast Group's**

# **MODERN SLAVERY STATEMENT**

**For the period 1st January 2024  
to 31st December 2024**

**Westcoast Group Holdings Limited** are providing the  
statement on behalf of the relevant group companies





## **The Westcoast Group: Anti-Slavery Statement for the period 1<sup>st</sup> January 2024 to 31st December 2024**

### **1: Introduction**

Modern Slavery and Human Trafficking are illegal, iniquitous practices, a violation of human rights and have no place in the world. Westcoast Group Holdings Limited ("**WGHL**") is committed to both preventing acts of modern slavery and human trafficking from occurring within its group's business and supply chain. WGHL provides this public statement on behalf of the Westcoast Group (as defined below) in accordance with section 54 of the Modern Slavery Act 2015 ("**MSA**").

### **2: Structure of the organisation**

The Westcoast group as it was formally known and as reported in previous annual modern slavery statements underwent a restructure in July 2024. As a result, that group has in effect been divided into two separate groups: (i) WGHL and its subsidiaries and (ii) Westcoast Holdco Limited ("**WHoldco**") and its subsidiaries. This restructure was as a result of an intended sale of WHoldco and its subsidiaries to Also Holding AG but which sale had not completed before this financial year end. It has been considered and agreed by the boards of the relevant companies that the prudent way to report comprehensively on anti-slavery measures whilst avoiding significant duplication is for WHoldco to provide a separate statement for the financial year 1 January 2024 to 31 December 2024 in relation to its current subsidiaries and for this statement to cover WGHL and its current subsidiaries following the restructure in July 2024.

WGHL is a parent company of the Westcoast group of companies (the "**Westcoast Group**"). WGHL was incorporated at Companies House on 28 January 2021 and became part of the Westcoast Group on 1 May 2021. WGHL does not trade and has no employees. Sitting just below WGHL in the Westcoast Group is Westcoast (Holdings) Limited ("**WHL**"), previously the parent management company of the Westcoast Group. WHL is 100% owned by WGHL. WHL owns all the other Westcoast Group companies. As such, WGHL and WHL do not have their own company websites.

The only subsidiaries the Westcoast Group has had since the end of July 2024 and as at 31 December 2024 with an annual turnover in excess of £36 million is (i) Komsa AG ("**Komsa**") and (ii) Centresoft Limited ("**Centresoft**"). During 2023, WHL commenced a programme of share purchase in the German-based subsidiary Komsa. As of 9 January 2025, WHL owns 99.98% in Komsa.

Centresoft was acquired by the Westcoast Group on 31 July 2024. As at 31 December 2024, Centresoft had 168 employees and a turnover of £403,762,000. Prior to WHL's acquisition of Centresoft, its parent, Combined Distribution (Holdings) Limited was part of Activision Blizzard Inc, for which that entity's UK subsidiary published a modern slavery statement.

Between 1 January 2024 and 31 July 2024, Westcoast Limited ("**WL**"), Clarity Computer (Distribution) Limited trading as Westcoast Ireland ("**Clarity**") and Westcoast France SAS ("**Westcoast France**") were subsidiaries of the Westcoast Group with a turnover in excess of £36 million (and Art Systems Limited until 30 June 2024 when it was hived up into WL and Spire Technology Limited ("**Spire**") which came into the group following its acquisition on 12 April 2024). From 31 July 2024, these entities ceased being subsidiaries of WGHL and moved outside of the Westcoast Group to subsidiaries of WHoldco Limited.

On 13 October 2023, WHL acquired a group of companies registered in Ireland. Binnian Ltd ("**Binnian**") is the non-trading holding company. Binnian's subsidiary is Datapac Ltd ("**Datapac**")

based in the Republic of Ireland. Datapac Limited is the main trading company and in FY22 had a turnover of 56 million Euros and as at 31 Dec 2023 had 83 employees. Datapac Business Solutions Ltd based in the Republic of Ireland and Datapac (N.I.) are trading subsidiaries of Datapac, with no employees. On 31 July 2024, Binnian Limited and its subsidiaries were sold to XMA Limited, a former Westcoast group company and as such, are no longer part of the Westcoast Group.

As well as the Westcoast Group having some non-trading entities with no employees, WHL also has a 50% shareholding in WAM Europe Limited ("**WAM**"). WAM has a turnover below the £36 million threshold legally required to report on.

As at 31 December 2024, the Westcoast Group's annual turnover was £1.263bn. All companies currently within the Westcoast Group have a financial year end of 31st December.

The Westcoast Group is British owned. WGHL and WHL are registered at the group's head office in Theale, UK.

### 3: Business of the Westcoast Group subsidiaries and it's supply chains

The heart of the business of the Westcoast Group focused on distribution of technology across operations in UK and Mainland Europe.

### 4: Westcoast Group's Policy on slavery and human trafficking

Slavery and human trafficking are illegal and a violation of human rights. There are many forms of modern slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain. Westcoast Group has a zero tolerance approach to modern slavery and human trafficking; we are committed to acting ethically, and with integrity in all our business dealings. Westcoast Group expects suppliers and other business partners to uphold high standards in their business practices.

### 5: Practices of Westcoast Group

As part of Westcoast Group's commitment to combating modern slavery, the Westcoast Group implemented the following practices:

- A Third Party Code of Conduct (the "**Code**") which includes provisions on slavery and human trafficking and ensures any third party Westcoast Group deals with adheres to the principles of this Code as a minimum standard
- precedent agreements referring to compliance with our Code and contractually requiring third parties the Westcoast Group deal with to adhere to standards no less than those in our Code.
- Our standard distribution agreement (which we ask new vendors to sign) contains specific anti-slavery provisions and confirms adherence to our Code.
- If suppliers insist on us trading on their terms, we ensure we insert a clause stating they must adhere to the principles of our Code and specific provisions relating to MSA compliance.
- We ensure our suppliers are aware of our practices and policies and adhere to the same high standards.

- On 1 January 2023, Germany implemented its equivalent of the MSA, the German Act on Corporate Due Diligence Obligations in Supply Chains ("**LKSG**"). For this financial year, Komsa does not have over 1000 employees and it was not therefore legally required to adhere to the provisions outlined in the LKSG from 1 January 2024. Notwithstanding this, Komsa has adhered to the provisions in the LKSG. Komsa regularly evaluates its suppliers using a systematic approach based on their location and industry and conducts specific reviews when indicators suggest that standards may not be met. LKSG compliance falls under the responsibility of Komsa's Legal, Compliance, and Risk Department.

Given the significant structural changes within the Westcoast Group throughout 2024 and the movement of the largest trading entities outside the group (with the exception of Komsa and acquisition of Centresoft) which often took the lead on the group's anti-slavery practises, there is an awareness that it would be prudent for the Westcoast Group to re-consider the adoption of and uniformity of best practises in relation to modern slavery across the remaining trading operations.

## 6: Due diligence processes

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains.
- reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- provide adequate protection for whistle-blowers.

We have policies and procedures in place to enable our employees to whistle blow and have safeguards in place should the need arise for them to do so. We have recently updated and improved our internal whistleblowing policy.

Our internal recruitment policy is based on procedures that focus on compliance with all applicable legislation and ensuring the right to work, validity of documents and work permits for foreign workers. We do not employ those that would be considered to be child workers and whilst we may employ young and inexperienced workers or give work experience, they are subject to the rights and protections that we afford all workers. Passport checks are undertaken for all employees, temporary workers and contract staff.

## 7: Risk assessment and measuring effectiveness

For a number of years, monthly compliance meetings with senior stakeholders to discuss any new legislation, concerns and best practice have been held. Our Modern Slavery Statements and best practice remain on the agenda. Attendance at these meetings require a senior representative from each group company to ensure a unified approach across the group and to learn from the wider experience of the Westcoast Group.

We evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by monitoring any anti-slavery policy changes to high value suppliers to ensure any changes are assessed for potential risk or compliance failure.

Where we have identified a potential risk, these can be investigated, remediated and mitigated through activities such as due diligence, improved procurement practices or industry collaboration.

## 8: Training and Further Actions

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

- All new employees undergo an Anti-slavery awareness course as part of their induction process (including adherence to our Code).

In 2025, Westcoast Group should re-assess the position of its current group entities and consider if it can improve on existing measures or take any additional steps to combat slavery.

## 9: Sign-off

This statement is made in accordance with section 54(1) of the MSA and constitutes Westcoast Group's Anti-slavery and human trafficking statement for the financial year ending 31 December 2024.

The Board of WGHL approved this statement for the Westcoast Group on 20 February 2025.

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Sunil Madhani,  
Director for and on behalf of WGHL WHL, and Centresoft  
Date: 20 February 2025