

A photograph of three business professionals sitting in a modern office lounge. A woman in a light grey suit is on the left, a man in a light purple shirt and glasses is in the center, and a man in a maroon polo shirt is on the right. They are seated in dark wicker chairs around a round black table. Large windows in the background show a lush green landscape with trees and a building. The text 'Group Anti-bribery and Corruption Policy' is overlaid in white on the left side of the image.

# Group Anti-bribery and Corruption Policy



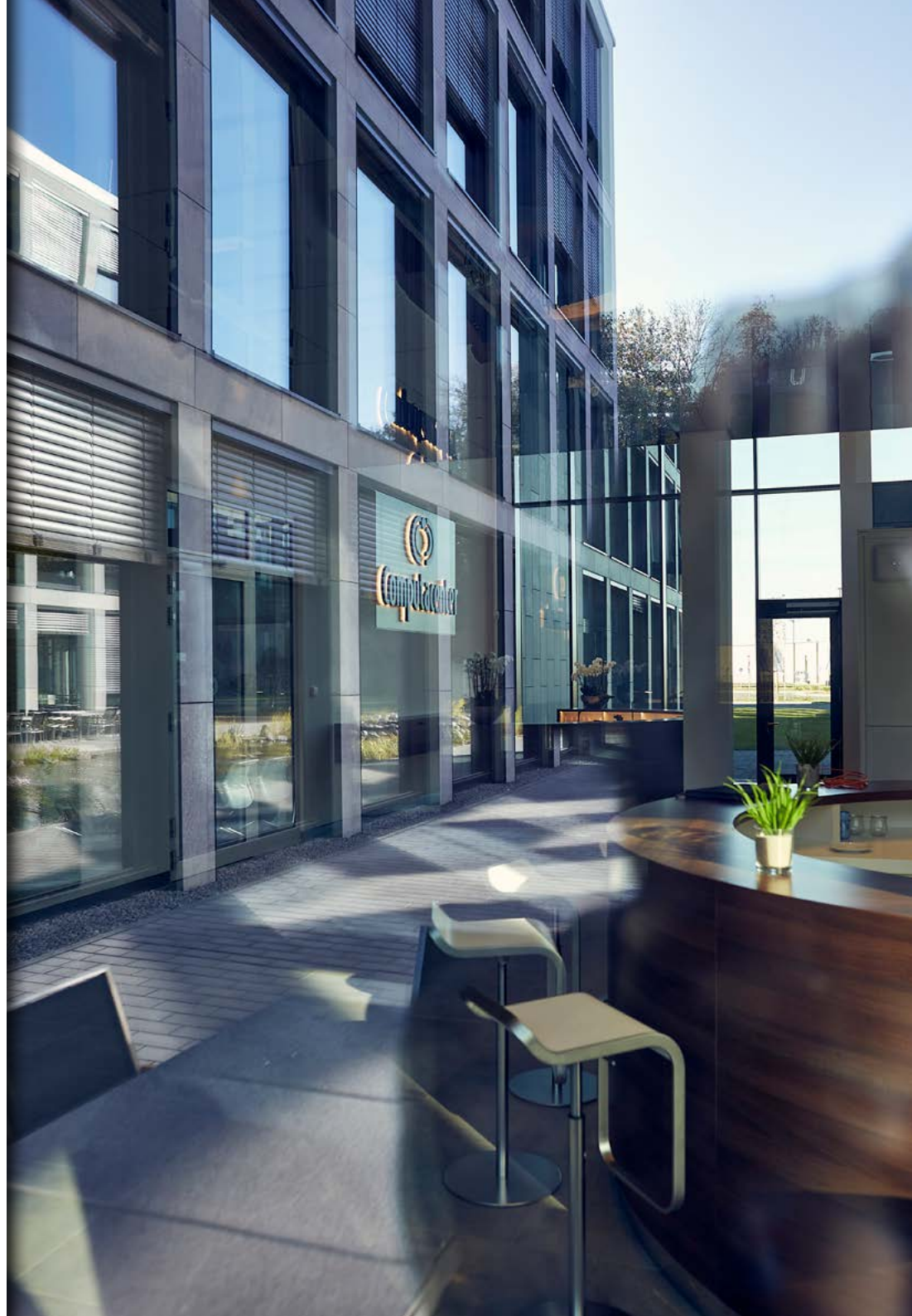


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## Document Control

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## Our Commitment and Responsibility

At Computacenter, we are committed to conducting business the right way. Our people and our customers trust in us to operate in a way that is fair, ethical, and in line with our Winning Together Values (our “Values”). Computacenter does not tolerate any form of bribery or corruption and is dedicated to operating transparently and honestly. We have adopted a singular global approach: 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.

Our expectations of you are included in our complete Group Compliance policy set, including this Anti-Bribery and Corruption Policy, and our Group Ethics Policy and Code of Business Conduct.

The trust that our customers place in us is paramount, and preserving that trust is vital to our continued success. Our people are at the heart of fostering this trust, and we rely upon each of you to uphold our Values and legal obligations. As a company, we would not breach the trust we have developed simply to gain an unfair business advantage over our competitors by engaging in improper and illegal activities, such as bribery and corruption.

Non-compliance with anti-bribery and corruption laws can lead to severe civil and criminal penalties for both individuals and Computacenter. It can also damage our reputation. Therefore, we actively uphold this policy through a consistent tone from the top, vigilant oversight, training, and a culture of open reporting without fear of retaliation.

As a Computacenter employee, it is your responsibility to ensure that your actions reflect our company policies, our Values, and the law. If you are aware of, or suspect a policy violation, you are expected to report this through the appropriate channels, including Safecall, our independent and confidential whistleblowing service.



Our people and our customers trust in us to operate in a way that is fair, ethical, and in line with our Winning Together Values





## Purpose and Scope

The purpose of this policy is to set out Computacenter's position on bribery and approach to complying with anti-bribery and corruption law. This policy also provides guidance that will assist you in the prevention, detection, and reporting of behaviours which do not comply with the law and our policy. Our goal is to ensure that your actions and decisions align with this policy, our Values, and the law. You should use this policy, along with our Group Ethics Policy and Code of Business Conduct and other related policies, as a reference.

All Computacenter employees, including permanent, full-time, part-time, temporary, and fixed-term employees, board members, officers, and directors ("our people") must adhere to this policy in both spirit and letter when engaging in business activities.

This policy is the foundation of Computacenter's anti-bribery and corruption programme. It provides you with practical advice, resources, and contacts for your support. It is imperative that you familiarise yourself with this information so that you fully understand your obligations, to protect the company and its reputation, put our customers first, foster a positive corporate culture, and act with integrity at all times.

If you suspect or are aware of any policy breaches or even potential conflicts, it is your duty to report

them immediately. Ignoring such issues or "turning a blind eye" is not acceptable and may result in disciplinary action, including dismissal, suspension, warning and possible legal repercussions.

For more information or to report concerns regarding this policy or violations of the law, contact your manager, the Group Legal and Compliance team, or utilise the Speak Up reporting routes available as detailed in our Speak Up [Whistleblowing] Policy as soon as possible. Reports are handled in strictest confidence, and reporters are free from retaliation. If you have any questions about this policy, please contact Group Legal and Compliance.

Please note: nothing in this policy limits any rights afforded to you under local law which may permit reporting to external government agencies in accordance with local whistleblower legislation.

> [Speak Up policy](#)

> [Group Ethics policy and Code of Business Conduct](#)

## Your Obligations

### Employee obligations

A culture of compliance is key to ensuring we are preventing, detecting, and deterring bribery and corruption. You must exercise caution in relation to potential bribery and compliance issues, and in particular, you have an obligation to:

- Abide by this policy and other related policies.
- Complete mandatory anti-bribery training.
- Cooperate with investigations.
- Accurately report expenses - see accurate books and records section below.
- Register gifts or anything of value given or received by third parties or customers to the Company Gifts and Hospitality Register.
- Speak up if you suspect bribery or corruption has occurred or may occur.

### Obligations to maintain accurate books and records

You must maintain accurate books and records in compliance with Computacenter policy and applicable laws. As an employee, you are prohibited from concealing or knowingly falsifying business records. Maintaining accurate books and records

is required and is critical, as most bribes involve missing, inaccurate, or false information in company documents. This means you must accurately report expenses, log gifts in the appropriate Gifts and Hospitality Register, and obtain appropriate manager level approval.

Failure to comply compromises the integrity and validity of our recordkeeping and could subject both you and Computacenter to serious penalties or even criminal liability.

### Manager obligations

If you are a manager, you have an obligation to ensure that all of your employees properly log any gifts, hospitality, or entertainment in the appropriate Gift and Hospitality Register. You are also responsible for regularly reviewing and supervising these activities to ensure adherence to our policy.

You may also be required to assist various compliance activities such as providing information for investigations into non-compliance, participating in audits, or engaging in activities that support our commitment to compliance in this area.

> Gifts and Hospitality Register







## Policy and Applicable Law

At Computacenter, we are firmly committed to adhering to the requirements of applicable anti-bribery and corruption laws in all jurisdictions in which we operate, and in particular the UK Bribery Act of 2010, that applies to Computacenter in all jurisdictions. We uphold a strict zero-tolerance stance against any form of bribery or corruption, and therefore you must remain vigilant to ensure that such conduct never filters through to our practices.

You are prohibited from offering, accepting, or soliciting bribes, and you must conduct business transparently and honestly. No employee or associate is permitted to engage in activity that is or could be construed as bribery or corruption, irrespective of citizenship, domicile, or location.

### What is bribery?

Bribery is the offering, giving, or receiving anything of value – whether monetary or otherwise in order to improperly influence someone’s decisions or actions. The term “anything of value” can include tangible items such as gifts, hospitality, entertainment, accommodation, job offers, internships, charitable donations, or other favours including discounts, or the use of materials, facilities or equipment or any favour that is offered or given to improperly sway or influence a decision, regardless of its cost to the giver.

Broadly, a bribe is any item that has value to the recipient and is offered to improperly influence the recipient. Note that this policy does not concern exchanges between Computacenter employees, such as tokens of appreciation from managers to employees.

# Gifts, Entertainment and Hospitality

## General guidance

The giving and receiving of reasonable and proportionate gifts, entertainment, and hospitality to and from third parties is a common practice in our industry. You may give or receive gifts and hospitality as a gesture of goodwill or to maintain ethical business relationships so long as it is done in compliance with this policy.

## What is defined as a gift or hospitality?

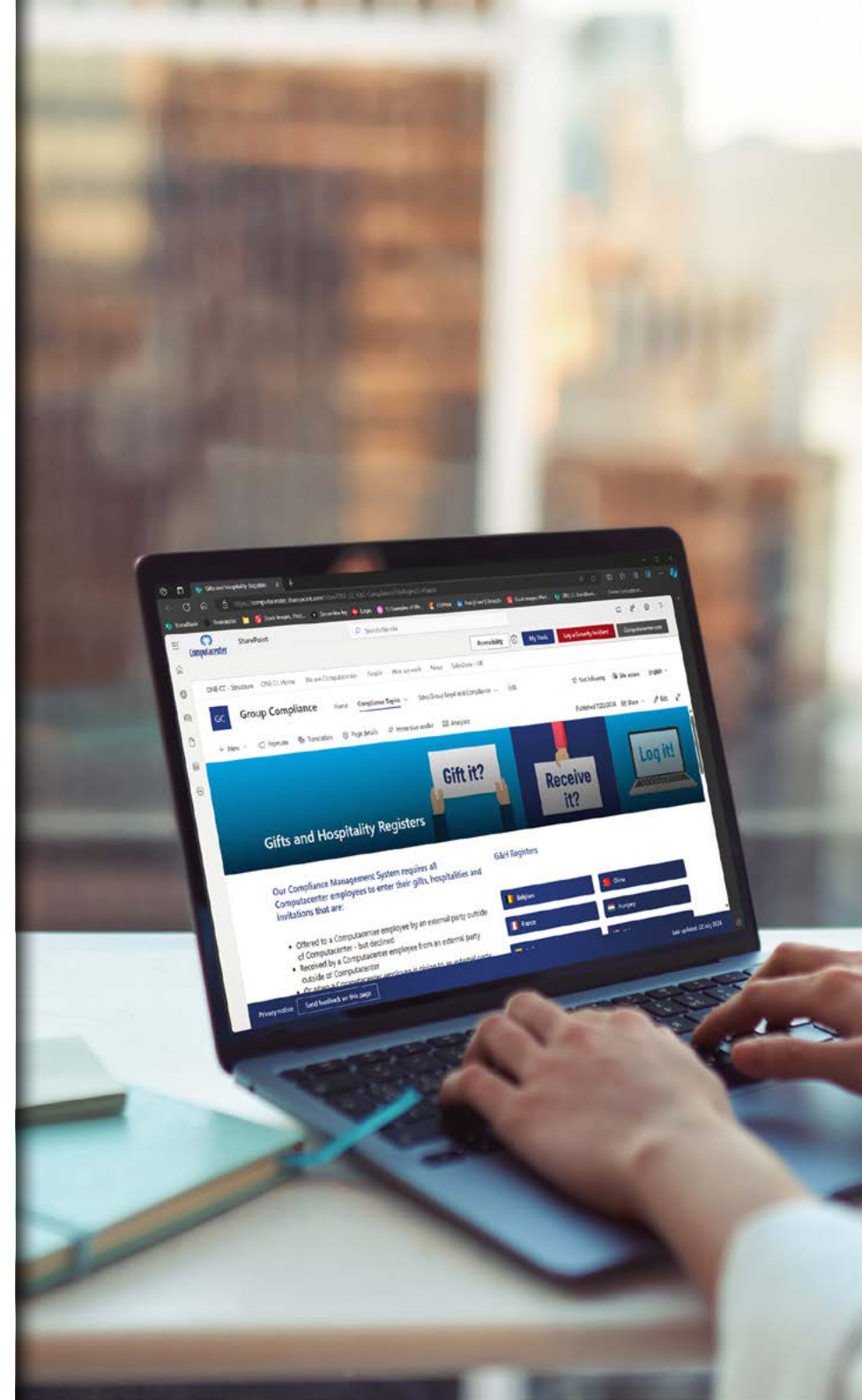
Gifts and hospitality can include tangible items such as physical gifts, hospitality including meals or entertainment, accommodation or tickets to events or entertainment. Broadly it includes anything of value to the recipient.

In order for a gift and/or hospitality to be compliant with this policy:

- It must be logged in the appropriate Computacenter Gifts and Hospitality register if it is more than a nominal value;
- It must not be given to a public or government official without prior approval from Group Legal and Compliance regardless of value.
- It must comply with policy thresholds;
- It must have proper manager approval which considers the factors below.

As a manager, when determining whether to approve a gift and/or hospitality, you must consider the following factors:

- There must be a legitimate business purpose.
- Gifts and hospitality should not be continuously given to the same party.
- It must be reasonable and proportionate.
- It must have been given in a transparent and truthful manner.
- It must not violate the giver or receiver's company policy.
- It must not have been given or received with the intent to improperly influence a business decision or gain an unfair business advantage.





### Attendance required for entertaining

Entertaining and hosting customers at business-related and even social events must be intended to further business relationships. Therefore, a Computacenter representative must be in attendance at any event where a third party or customer is hosted; you are not permitted to give entertainment or give tickets to a third party or customer where no Computacenter representative will be present.

### Gift cards, cash, or cash equivalents

You are strictly prohibited from offering or receiving cash or cash equivalents, such as credit cards. This is due to the lack of trackability.

**Exception:** gift cards of nominal value limited to food and drink associated with business meetings are acceptable and must be reported if the equivalent value falls within the reporting thresholds.

> Gifts and Hospitality Register

> Gifts and Hospitality Policy Thresholds





## Prohibited Activities

### Government officials

Unless you have specifically received prior written authorisation from Group Legal and Compliance, Computacenter prohibits the giving of gifts, entertainment, hospitality, or anything of value to government officials. This includes even gifts of nominal value to avoid the appearance of impropriety. It is also never permissible to provide a donation to improperly influence a government official. A government official may include:

- An officer or employee of any local, provincial, or national government, including government agencies, members of parliament, police officers, firefighters, members of the military, tax authorities, customs inspectors, or regulators.
- Any person with the responsibility to allocate or influence expenditures of government funds, including persons serving in unpaid, honorary, or advisory positions.
- An officer or employee of a public international organisation, such as the United Nations, International Olympic Committee, International Red Cross, or World Bank.
- Any person acting in an official capacity or on behalf of any government or public international organisation, such as an official advisor.
- Any officer or employee of a political party.
- Any candidate for political office.
- A close relative such as a parent, sibling, spouse, or child of any of the above.

In addition, gifts and hospitality to employees of government-owned or controlled businesses may be prohibited by law depending on your jurisdiction. Government-owned or controlled businesses may include telecommunication

companies, oil and gas companies, airlines, railways, hospitals, or utilities. If gifts and hospitality are legally permitted to government-owned or controlled businesses, you must also verify that the government customer's policies permit them to receive gifts. In addition, you must also obtain prior written approval from Group Legal and Compliance.

### Facilitation payments

Facilitation payments, also referred to as "grease payments" or "expediting payments", are payments to government officials to expedite the processing of routine government services in foreign countries, such as licenses, visas, customs clearance, or permits. Computacenter expressly prohibits you from making any facilitation payments regardless of the amount. While some countries or jurisdictions legally permit facilitation payments, these payments are not permitted under Computacenter policy.

**Exception:** [highly limited exceptions] where you have reasonable belief that a facilitation payment is necessary to avoid imminent threat to your life, safety, or welfare. In this instance, contact Group Legal and Compliance or HR immediately for support, as soon as reasonably practicable.

### Off-the-book records or slush funds

"Off-the-book records" or "slush funds" are unofficial accounts containing funds that are not recorded in accordance with company policy. These are strictly prohibited. These accounts often have little to no internal oversight or controls, and therefore are viewed by anti-bribery and corruption officials as a source of illegal funds which are associated with bribes.



## Third Party Activities and Incentives

### Third Parties

Computacenter is committed to working with partners who uphold transparency and integrity in their operations. You have an obligation to ensure that any third parties that you engage with comply with these stringent requirements. It is imperative that you report any instances of non-compliance.

Partnering with trusted entities is key to providing high quality services to our customers. Therefore, compliance with anti-bribery and corruption laws extends to all our third parties including suppliers, distributors, manufacturers, contractors, agents, consultants, partner organisations, and intermediaries. Prior to engagement with Computacenter, you must ensure third parties you engage undergo a due diligence assessment and demonstrate a commitment to our ethical standards, including implementation of an anti-bribery and anti-corruption compliance programme.

Third-party representatives acting for Computacenter are strictly prohibited from engaging in any form of corrupt practices, including making facilitation payments on our behalf. This prohibition extends to subcontractors hired by third parties to perform work on Computacenter's behalf. All financial transactions, whether payments, commissions, compensation, or reimbursements, must adhere to our standards: they must be reasonable, serve a legitimate business purpose, and be accurately documented in Computacenter's books and records. Cash payments are strictly prohibited.

### Marketing Development Funds

Marketing and development funds (MDF) are defined as funds that are granted to channel partners as a resource to increase sales and enable the marketing of products or services. MDF funds must originate with an Original Equipment Manager (OEM) agreement or approval document (collectively, "MDF Agreement") which defines the terms and specifications. MDF must be used only for the activities specified in the MDF Agreement. You must comply with this policy when engaging in MDF activities. This includes having appropriate level manager approval, and ensuring the activity is accurately logged in the Gifts and Hospitality Register.

### Special Performance Incentive Fund (SPIF)

Based on your role, you may be eligible to participate in Sales Performance Incentive Funds (SPIFs) which are incentive programmes offered by our partners and designed to promote sales. SPIF programmes must be approved and administered by Computacenter before you are allowed to participate. Partners must pay SPIF funds to Computacenter, funds earned will be disbursed to you as a participant subject to its approval and discretion. You are prohibited from receiving funds or other tangible benefits directly from the partner. Computacenter reserves the right to withhold disbursements where violations of this policy, other Computacenter policies, or partner participation rules have occurred.

## Sponsorship and Donations

Charitable and political contributions can pose a risk for bribery where the intent is to influence or improperly gain an improper advantage, and therefore contributions must comply with this policy.

### Charitable donations

Computacenter and its employees may engage in charitable activities. However, these activities must comply with this policy. You must never use or make donations to improperly influence a third party or customer, including government officials, in exchange for any improper favour or benefit. Charitable contributions must have appropriate manager-level approval, and must be logged in the Gifts and Hospitality Register.

### Political contributions

Computacenter does not make corporate political contributions. You are prohibited from making political contributions on behalf of Computacenter.



## 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 policy 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](mailto:computacenter@safecall.co.uk), or by submitting a report at [www.safecall.co.uk/report](http://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](#).

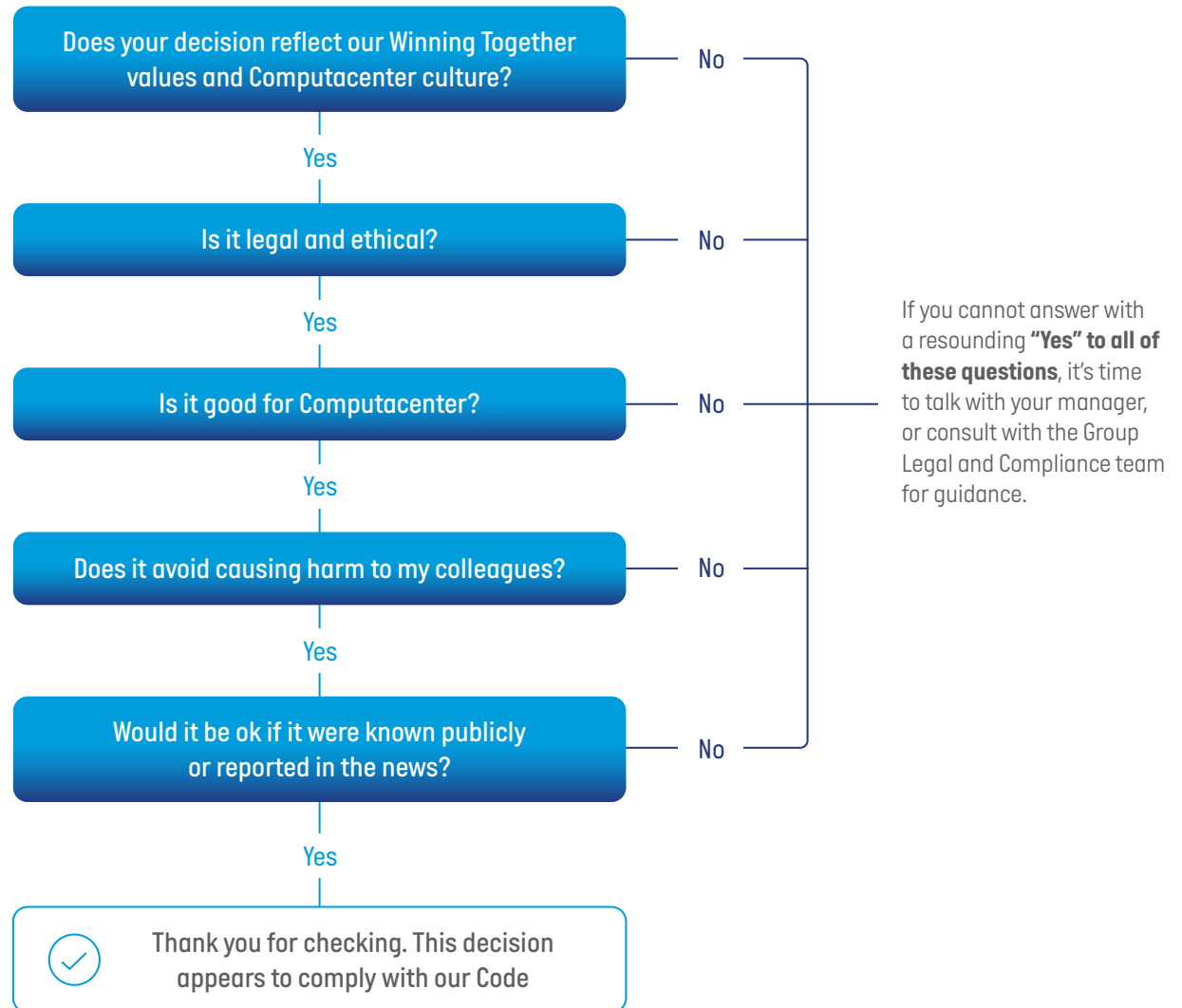
 [Speak Up policy](#)

## 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.

## Contact us

For questions about this policy, please contact the Group Legal and Compliance team at [mb.compliance@computacenter.com](mailto:mb.compliance@computacenter.com) or visit the Group Legal and Compliance site for further supporting information.







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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.