



Partner Success. It's what we do.

MODERN SLAVERY STATEMENT UNDER SECTION 13 OF AUSTRALIA'S MODERN SLAVERY ACT 2018

Introduction

Westcon-Comstor is a leading global distributor of business technology.

Operating in more than 70 countries, we deliver business value and opportunity by connecting the world's leading IT vendors with technology resellers, systems integrators and service providers.

Our group specialises in the distribution, integration of hardware and software solutions used within enterprise networks and cyber security infrastructure, the build out of data centres and Hyperscaler solutions.

Westcon Group Pty Limited is committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain and expect all suppliers to adhere to the same standards.

Structure of the organisation

Westcon Group Pty Limited is a subsidiary of Westcon International Limited whose ultimate parent company is Datatec Limited, a company incorporated in South Africa.

Westcon Group Pty Limited is Westcon Group's trading company for sales made in Australia. Westcon Group Pty Limited has one subsidiary, Westcon Group NZ Limited, a company which is responsible for Westcon Group's sales in New Zealand.

Westcon Group's headquarters are based in the United Kingdom with sales offices and distribution centres across EMEA and APAC.

Measures

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, as well as to implementing controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our commitment to combating modern slavery, child labour and human trafficking, we have a number of measures in place to ensure that we are conducting business in an ethical and transparent manner. These include:

- We have a Code of Conduct which requires ethical dealing with suppliers and customers, adherence to our Anti-slavery Policy, as well as a zero-tolerance approach to slavery, child labour and human trafficking;
- The group operates a [hotline](#) which allows any violations of our Anti-slavery policy or Code of Conduct to be reported anonymously; no colleague will suffer any retaliation by the Company due to a report being made; our hotline is regularly monitored by our parent company, Datatec;



Partner Success. It's what we do.

- As part of our vendor onboarding process, we ensure that new vendors with which we do business are operating legally and ethically – this includes adherence to our Code of Conduct which incorporates commitments related to modern slavery and child labour;
- As part of our contracting process for vendors, we require them to confirm compliance with the Responsible Business Alliance Code of Conduct, as well as agreeing to specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children;
- We also require sub-contractors to comply with our Code of Conduct;
- We require vendors to disclose whether there are any Conflict Minerals in products we source from them; and
- We conduct annual online training and certification for employees to ensure awareness and adherence to our Code of Conduct.

Environmental, Social & Governance (ESG)

Our ESG programme is run in co-ordination with our parent company, Datatec's social and environmental function and oversees the Company's performance on a range of Ethics and Sustainability issues, including human rights.

Sustainability ratings

Westcon is registered with EcoVadis, a global provider of business sustainability ratings. Westcon's performance is assessed annually by EcoVadis across a range of areas, including Ethics, Sustainable Procurement and Labour & Human Rights (the latter includes Child Labour, Forced Labour and Human Trafficking).

We continue to use the EcoVadis platform as a mechanism to identify areas for improvement. During FY25, we had our first global level assessment and achieved a bronze rating.

Audit of vendors

We conduct supplier due diligence as part of our ongoing commitment to responsible sourcing. In 2023, we undertook a formal due diligence exercise across our supply chain, engaging directly with suppliers to assess labour practices and identify areas of risk.

In FY26, we conducted a further due diligence exercise, introducing a risk-based methodology for stock supplier selection. Using a combination of AI-assisted analysis via a platform called Datamaran, alongside external risk intelligence tools, we assessed stock suppliers against two key criteria: the extent to which they already address relevant topics in their own ESG and financial disclosures and human rights exposure associated with their industry.

Following this desktop risk assessment, we engaged directly with the identified higher-risk suppliers. We intend to expand the breadth and quality of supplier engagement during the current financial year.



Partner Success. It's what we do.

Supply Chains

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains all new vendors are required to undergo an onboarding and due diligence process to ensure that vendors with which we do business are operating legally and ethically.

Risk and compliance

We consider that the risk of modern slavery occurring in our first-tier supply chain is low because most of our major suppliers are large, industry leading organisations who have adopted their own anti-slavery policies and procedures.

As all Westcon entities have a common supply chain, it was not necessary to consult separately with the entities listed above in assessing our risk profile.

Remediation

In the event slavery, human trafficking or child labour is suspected or discovered in any part of our supply chain, the relevant vendor manager, Head of ESG and if required, our Compliance Officer and / or our General Counsel will open discussions with the affected vendor so that a remediation plan can be created.

Training

All our employees are required to complete annually an interactive online training course which includes awareness of our Code of Conduct. As part of this, we encourage colleagues to use our whistleblowing hotline if they have concerns which they would like to raise.

Our ESG team has also rolled-out "ESG Fundamentals" training which covers a variety of areas, including human rights and ethics.

Further actions

In FY27, the ESG team intends to review and enhance our supplier due diligence process. This statement was approved by written resolution of the board of directors of Westcon International Limited for and on behalf of itself, as well as Westcon Group Pty Limited. The board of directors of Westcon International Limited is the principal governing body of Westcon Group Pty Limited.

Signed

DocuSigned by:

DAVID CORCORAN

068695E23BD6407...

Dave Corcoran
Chief Finance Officer, APAC

For and on behalf of Westcon Group Pty Limited