



The Westcoast Group: Anti-Slavery Statement for year ended 31 December 2019*

1: Introduction

Westcoast (Holdings) Limited (“**WHL**”) is committed to preventing acts of modern slavery and human trafficking from occurring within its group’s business and supply chain and imposes the same high standards on its suppliers. WHL 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**”).

“Westcoast takes its Anti-slavery and Human Trafficking requirements extremely seriously and is wholly committed to eliminating such practices from our supply chain. We have made significant efforts to ensure full compliance with our legal and social responsibility” Andy Newberry - Westcoast Group’s Operations Director.

2: Structure of the organisation

WHL is the parent management company of the Westcoast group of companies (the “**Westcoast Group**”). The Westcoast Group is British owned and WHL has its head office in Theale, UK. The Westcoast Group has an annual turnover of £2.8bn. It has a number of subsidiaries including the following which all have a turnover in excess of £36 million: Westcoast Limited (“**WL**”), XMA Limited (“**XMA**”), Art Systems Limited (“**Art Systems**”), Clarity Computer (Distribution) Limited trading as Westcoast Ireland (“**Clarity**”), Westcoast France SAS (“**Westcoast France**”) and Data Select Limited (“**Data Select**”).

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

As at 31 December 2019, the Westcoast Group employed 1515 people across business operations in UK and Mainland Europe. The active subsidiaries within the Westcoast Group provide services and distribution, as further particularised below.

WL is a global partner in the technology products, services and solutions markets. WL works with a range of suppliers, almost all of which are global manufacturers of Electronic Office Supplies (EOS) and within the UK, WL are consistently their primary route to market. WL’s head office is in Theale.

<https://www.westcoast.co.uk/>

XMA originated in the 1980s from offices in Nottingham. XMA operate as a UK based IT Reseller, IT Services provider and Manufacturer of Viglen devices: <https://www.xma.co.uk/>

Founded in 1986 and operating from offices in Nottingham, Art Systems is a UK based distributor of computer peripherals and supplies and the provision of technical services: <http://www.artsystems.co.uk/>

Clarity is a distributor of goods and services in the IT sector. Clarity was incorporated in 1990. As at 31 Dec 2019, Clarity had 35 employees in Dublin, Ireland and operate principally in Ireland (with some minor trading in the UK): <https://www.westcoastireland.ie/>.

WHL purchased Westcoast France in 2016. Westcoast France distributes IT products to IT Resellers and major retailers. Westcoast France employs 105 people in France. Westcoast France’s key suppliers are based exclusively in continental Europe. <http://www.westcoastfrance.fr/>

WHL purchased Data Select in September 2019. Data Select is one of the UK’s leading end-to-end mobile and tech solutions providers. As at 31 December 2019, Data Select had 46 employees. Data Select focuses on

delivering a complete supply chain service to the UK's leading B2B, online and retail customers, as well as some of the world's leading brands. Data Select's financial year end is currently different to all of the other above named Westcoast Group companies, being 30 April 2019. Data Select last published its Modern Slavery Statement on 19 December 2019. Notwithstanding the different financial year of Data Select, as the Westcoast Group took the decision last year to have a group Modern Slavery Statement, the Board has taken the decision to incorporate Data Select into its Group Statement.* It is believed this step will assist the Westcoast Group in ensuring Data Select's stance on policy and standards on Modern Slavery are no less than the remainder of the Group. <https://www.dataselect.com/>

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, we have implemented the following practices:

- Advocate as many of our suppliers as possible being members of the "Responsible Business Alliance" (formerly the Electronic Industry Citizenship Alliance.)
- Produce a Group Supplier Code of Conduct (the "**Code**") (<https://www.westcoast.co.uk/Admin/Downloads/Westcoast%20Group%20Supplier%20Code%20of%20Conduct%20Nov%202017%20-%20FINAL%20PDF.pdf>) which includes provisions on slavery and human trafficking and ensure all of our suppliers adhere to the principles of this Code as a minimum standard. The Code is also available on XMA's website.
- Our standard distribution agreement (which we ask new vendors to sign) contains specific anti-slavery provisions and confirms adherence to our Code. We noted Data Select's standard distribution agreement did not contain any anti-slavery provisions and we have therefore amended this agreement to include such provisions.
- Our cloud vendor agreement (which we ask new cloud vendors to sign) contains anti-slavery provisions.
- WL's and XMA's standard terms of purchase (https://www.westcoast.co.uk/about-us/Standard_Terms_of_Purchase.html) (http://www.xma.co.uk/docs/company-docs/xma_purchasingterms-conditions) refer to suppliers adhering to the MSA and our Code.
- If suppliers insist on us trading on their terms, we ensure we insert a clause noting they have to 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.

We annually submit our Group Statement to the Transparency in Supply Chains ('TISC') Report, an open data modern slavery statement register to support the UK in fighting modern slavery.

6: Due diligence

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

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains.
- monitor potential risk areas 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. WL considered the efficacy of a dedicated whistle blower telephone hotline and/or web-based reporting tool which could be used to report any issues or behaviours that may be inconsistent with our Code. However, it was felt that the current mechanism contained in our Whistleblowing Policy of (i) an employee reporting in confidence to their immediate supervisor or if that is not possible to do so, to report to Emily Garvey, (the "Whistleblowing Officer"); (ii) the Whistleblowing Reporting Form available on the intranet which can be emailed directly to the Whistleblowing Officer or posted anonymously; and (iii) the ability for anybody to make an anonymous report in writing posted to the Whistleblowing Officer was sufficient. Any report submitted via whatever method will always be handled promptly and confidentially.

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.

The BBC publicised this year 'the biggest modern day slavery network' in the UK which involved tricking people from Poland into England with the promise of work and a better life, which was discussed in our monthly compliance meetings, We have a number of Polish employees which work in our warehouses and whilst the above-mentioned recruitment checks are always carried out, we have taken the additional step of creating posters which have been put in all of our warehouses to assist with educating employees on Modern Slavery and the importance of reporting concerns.

XMA has developed it's application process for third party contractors to include compliance questions regarding the MSA, with XMA reserving the right to reject any contractor who does not or will not evidence such compliance.

XMA have internally mapped and graded their existing supply chain to identify which suppliers demonstrate the highest potential risk of non-compliance with the MSA.

XMA's Manufacturing Director has carried out visits to major suppliers within China to validate their operations including compliance with the MSA.

7: Risk and compliance

Westcoast Limited has for a number of years held a monthly compliance meeting with senior stakeholders to discuss any new legislation, concerns and best practice. Our Modern Slavery Statements and best practice remain on the agenda. This year we have taken the step to formally require the attendance at these meetings of a representative from each group company to ensure a unified approach across the group and to learn from the wider experience of the Group.

We regularly 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.

We do not consider that Westcoast Group operates in high-risk sectors or locations as most slavery and trafficking occurs within clothing and fashion (ready-made garments) and agricultural products or source raw materials from countries with high modern slavery risk.

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.

We ensure all our suppliers adhere to the principles of our Code. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

8: Training and Further Actions

We are keen to 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 now undergo an Anti-slavery awareness course as part of their induction process (including adherence to our Code).
- XMA and WL have established a high level training program focused on the MSA which was developed for inclusion within our Learning Management System, which was made compulsory for all current employees and permanently accessible by any employees for ongoing training.

In 2020,:

- We will continue to improve our efforts to ensure that modern slavery and human trafficking do not occur in our supply chain.
- XMA will ensure 95% of its spend remains with Tier 1 suppliers. XMA will contact all Tier 1 suppliers to understand their plans for 2029 and how they will maintain compliance with the MSA.
- XMA will continue to visit and audit all high risk suppliers in the UK and overseas.

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 2019.

WL, XMA, Art Systems, Clarity, Data Select and Westcoast France's Boards have all approved this statement for the Westcoast Group with the final approval from the WHL Board on 11 June 2020.

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Sunil Madhani,

Director for and on behalf of WHL, WL, XMA, Art Systems, Clarity, Westcoast France and Data Select

Date: 23 June 2020