Westcoast Limited

Anti-Slavery and Human Trafficking Statement

We are committed to improving our practices to combat slavery and human trafficking. The Modern Slavery Act 2015 (the 'Act') requires manufacturers and retailers doing business in the UK with a significant annual turnover to disclose information regarding their efforts to assist with the eradication of slavery and human trafficking from their supply chain and within their own business.

Our Structure

We are a distributor of goods and services in the IT sector. We are a part of the Westcoast Group ('Group') and our ultimate parent company is Westcoast (Holdings) Ltd ('Holdings'). Holdings has its head office in Theale, UK. We have over 650 employees in the UK and operate principally in the UK (with some minor trading in Ireland and France).

Our policies 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 Limited 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 Limited expects suppliers and other business partners to uphold high standards in their business practices.

Due Diligence

As part of our initiative to identify and mitigate risk, we have reviewed the anti-slavery statements (where applicable) of our major partners and we are reassured that they, in the main, independently audit their own compliance with their policies and procedures to help eradicate slavery and trafficking. In addition, many of our high value partners confirm adherence to the Electronic Industry Citizenship Coalition (EICC) code of conduct which ensures strict compliance with sound environmental and ethical principles (which are subject to independent audit).

Compliance

We have appropriate controls in place to ensure our employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

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.

Our product vendors and carriers are required, by contract, to operate in full compliance with laws and regulations, including those regarding human trafficking and anti-slavery. In selecting and retaining our product suppliers, we show preference to those who meet and exceed our expectations in abiding by the EICC code of conduct.

Responsibility

Westcoast's Operations Director has overall responsibility for ensuring this statement complies with Westcoast's legal and ethical obligations, and that all those under our control, comply with it. The Operations Director also has responsibility for updating the policy to reflect future changes in legislation. Employees are encouraged to raise concerns about suspicions of modern slavery or human trafficking in any parts of the business or supply chains at the earliest possible stage.

This statement is made pursuant to section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.

Approved by the Board of Directors on 3 July 2017

Signed:

Andy Newberry, Operations Director Westcoast Ltd

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