



Westcoast Ltd: Anti-Slavery Statement 2017

1: Introduction

Westcoast Ltd is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

“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 Operations Director.

2: Structure of the organisation

Westcoast Ltd is a global partner in the technology products, services and solutions markets. It is a major part of the Westcoast Group which in the whole employs circa 1500 people across business operations in UK and Mainland Europe.

The Westcoast Group has an annual turnover of £2.2bn, with Westcoast Ltd contributing £1.8bn to this sum. To find out more about the nature of our business, please visit our website <https://www.westcoast.co.uk/>

To provide services and distribution, we work with a range of suppliers, almost all of which are global manufacturers of Electronic Office Equipment (EOE) and within the UK, Westcoast are consistently their primary route to market.

3: Practices

As part of our commitment to combating modern slavery, we have implemented the following practices:

- Ensure as many of our suppliers as possible are members of the “Responsible Business Alliance” (formerly the Electronic Industry Citizenship Alliance.)
- Our standard distribution agreement (which we ask new vendors to sign) contains specific anti-slavery provisions and confirms adherence to our supplier code of conduct.
- Our cloud vendor agreement (which we ask new cloud vendors to sign) contains anti-slavery provisions.
- Our standard terms of purchase (https://www.westcoast.co.uk/about-us/Standard_Terms_of_Purchase.html) refers to suppliers adhering to the modern slavery act and our supplier code of conduct.
- If suppliers insist on us trading on their terms, we ensure we insert a clause noting they have to adhere to our supplier code of conduct (<https://www.westcoast.co.uk/Admin/Downloads/Westcoast%20Group%20Supplier%20Code%20of%20Conduct%20Nov%202017%20-%20FINAL%20PDF.pdf>) and we insert specific provisions relating to Modern Slavery Act 2015 (“MSA 2015”) compliance.

We ensure our suppliers are aware of our practices and policies and adhere to the same high standards.

4: 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.

5: Risk and compliance

Westcoast Ltd regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its 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 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 our Supplier Code of Conduct. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier.

6: 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 will now undergo an Anti-slavery awareness course as part of their induction process (including notification of adherence to our Employee ethical code of conduct).
- During 2018, all current employees will complete a new Anti-slavery awareness course based on Westcoast's "Supplier Code of Conduct"

7: Sign-off

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Westcoast Ltd's Anti-slavery and human trafficking statement for the financial year commencing ending 31 December 2017.

The Westcoast Board approved this statement on 11 June 2018.

Signature:



Andy Newberry
Operations Director, Westcoast Ltd

Date