



The Westcoast Group: Anti-Slavery Statement for year ended 31 December 2018

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 £2.2bn. It has a number of subsidiaries including the following which all have a turnover in excess £36 million: Westcoast Limited (“WL”), XMA Limited (“XMA”), Art Systems Limited (“Art Systems”), Clarity Computer (Distribution) Limited trading as Westcoast Ireland (“Clarity”), and Westcoast France SAS (“Westcoast France”).

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

As at 31 December 2018, the Westcoast Group employed 1358 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 2018, Clarity had 32 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 80 people in France. Westcoast France’s key suppliers are based exclusively in continental Europe. <http://www.westcoastfrance.fr/>

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:

- Ensure as many of our suppliers as possible are 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.
- 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.

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. In addition, WL is considering 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. Both reporting methods would need to be available 24 hours a day, 7 days a week. Reports submitted to both methods would 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.

XMA has developed its 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

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 will 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 will be accessible by all employees for training going forward.

In 2019,:

- 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 2019 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 – we are currently putting new OEM contracts in place with two new Far East based manufacturers. These OEMs will be vetted and reviewed to the same criteria as our Tier 1 UK suppliers and we will be looking to visit/audit them in 2019 as the manufacturing commences.
- Westcoast France will write to it's supplier base, seeking their commitment in relation to anti-slavery.

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 2018.

WL, XMA, Art Systems, Clarity and Westcoast France's Boards have all approved this statement for the Westcoast Group with the final approval from the WHL Board on 27 February 2019.

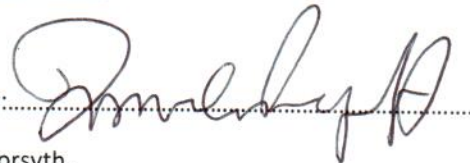


Signed by:.....

Sunil Madhani,

Director for and on behalf of WHL, WL, XMA, Clarity, and Westcoast France

Date: 5 March 2019



Signed by:.....

Duncan Forsyth,

Director for and on behalf of Art Systems

Date: 5 March 2019