

SUPPLIER CODE OF CONDUCT



Summary statement

Softcat is committed to high standards of, amongst others, environmental sustainability, human rights, anti-bribery and corruption, integrity and business security. We anticipate that all of our suppliers will abide by similar standards and conduct their business in an ethical manner. As a supplier, you must comply with all applicable local, national and international legislation and must also agree to observe the following code.

Human rights, equality and diversity

Softcat believes in fairness, equality and, above all, values diversity, both as an IT Reseller and as an employer. We require our suppliers to:

- comply with all relevant legislation including the Human Rights Act 1998 and the Equality Act 2010;
- respect the personal dignity, privacy and rights of all individuals, including your employees and those in your supply chain;
- not tolerate discrimination on the basis of gender, age, disability, race, religion, sexuality, social class or in any other way;
- ensure equal opportunities are available to all; and
- understand diversity through inclusion of all people, regardless of age, disability, gender, racial origin, religion, belief, sexual orientation, language, union activity etc.

Fair employment practices & conditions, slavery, human trafficking and child labour

Softcat is committed to ensuring that employment is freely chosen, child labour shall not be used, and no harsh or inhumane treatment will occur. Our suppliers are required to (and must ensure that their supply chain shall):

- respect the rights of employees to freely associate and bargain collectively;
- not use any forced labour or involuntary prison labour and allow all employees the choice to leave their employment freely upon reasonable notice;
- not force the relocation or movement of any workers;
- not use or promote forced or child labour in any way; and
- understand that all staff are entitled to work in an environment which respects their personal dignity and take steps to ensure that the working environment is free from harassment, bullying or any other type of intimidation.

Health and safety

Softcat aims to provide each employee with a safe working environment. We require our suppliers to:

- ensure that all operational locations meet, as a minimum, all local health and safety regulations;
- ensure all employees are appropriately trained and aware of all health and safety risks and procedures within their working environment; and
- record all accidents and/ or near misses and investigate these to determine if preventative action is

required to prevent further accidents.

Environmental sustainability

Softcat believes that it has a responsibility to identify and manage activities which affect the environment and we are committed to continually improving the environmental impact and sustainability of our business. We require our suppliers to:

- minimise the environmental impacts of existing operations and ensure that the environmental impacts of new operations are assessed;
- minimise waste and maximise recycling through the reuse and reconditioning of devices and other materials;
- make a responsible effort to minimise the use of packaging, reuse where practicable and avoid, where possible, the use of packaging which consumes a disproportionate amount of energy or resources during the manufacturing process;
- introduce programmes which aim to minimise waste;
- promote the ownership and control of environmental issues at business level;
- conserve energy and minimise carbon emissions, where practicable; and
- reduce your energy expenditure and increase energy efficiency as much as reasonably practicable especially in relation to lighting, heating, air conditioning and kitchen appliances (including water conservation).

Anti-Bribery, corruption and anti-competitive practices

Softcat adopts a zero tolerance approach towards bribery, fraud and corruption and is committed to the highest levels of ethical conduct and integrity in business activities. We require our suppliers to:

- refrain from and prevent any and all forms of corruption, extortion and bribery in accordance with the Bribery Act 2010;
- ensure that appropriate prevention procedures are in place to mitigate the risk of tax evasion and to comply with the provisions of the Criminal Finance Act 2017;
- apply this policy to all employees and directors and to temporary workers, consultants, contractors, agents and subsidiaries acting for and on behalf of our suppliers;
- understand that it is the responsibility of all employees and associated persons to assist in the prevention, detection and reporting of bribery, corruption and/or fraud;
- ensure all employees are aware of who to report and any concerns they may have, and encourage them to do so;
- ensure new business is procured in a responsible manner;
- ensure employees make the relevant person aware of any conflict of interest they may or suspect they may have; and
- not partake in any anti-competitive practices, including colluding with peers, suppliers or any other parties with the aim of influencing pricing, bid rigging, participating in or being involved with a cartel, or any other practice which is intended to or which has the effect of reducing free competition in any market place.

Secure business

Softcat is committed to maintaining the highest levels of security. We require our suppliers to:

- implement reasonable measures for minimising exposure to physical security threats such as terrorism, crime, pandemics and natural disasters;
- implement reasonable measures for minimising exposure to cyber security threats such as terrorism, crime, viruses (and other malicious code) and hacking;
- comply with the Data Protection Act 2018, the UK GDPR and the EU GDPR (as applicable), including ensuring that appropriate technological and organizational security procedures are in place and that any security concerns are reported promptly to the appropriate person; and
- protect all confidential information and intellectual property of others.

Blacklisting

Softcat is an equal opportunities employer and does not condone any unfair exclusion of any nature. Our suppliers are required to:

- abide by the Employment Relations 1999 Act (Blacklists) Regulations 2010, section 137 of the Trade Union and Labour Relations (Consolidation) Act 1992 and any similar legislation;
- not commit any breach of the Data Protection Act 2018, for example by the unlawful processing of personal data which is in connection with the use or creation of a prohibited list of employees.

In the context of your relationship with Softcat, if it is suspected that at any point the terms of this code of conduct have not been adhered to, or that you have reason to believe Softcat (or any of its other trading partners) have not complied with this code in any way, please raise these concerns with Softcat at your earliest opportunity. The relevant persons to contact are:

- Debra Coady, Legal Director & General Counsel: debraco@softcat.com
- Mark Overton, Head of Information Security: markov@softcat.com