



# WESTCOAST

## Westcoast Group's Modern Slavery Statement

for the period 1st January 2023 to 31st December 2023

*Westcoast Group Holdings Limited are providing the statement on behalf of the relevant group companies*



ART SYSTEMS



WESTCOAST CLOUD

WESTCOAST CLOUD



DATA SELECT



**WESTCOAST**  
LIMITED



**WESTCOAST**  
FRANCE



**WESTCOAST**  
CLARITY



## The Westcoast Group: Anti-Slavery Statement for the period 1<sup>st</sup> January 2023 to 31st December 2023

### 1: Introduction

Modern Slavery and Human Trafficking are illegal, iniquitous practices, a violation of human rights and have no place in the world. Westcoast Group Holdings Limited (“**WGHL**”) is committed to both preventing acts of modern slavery and human trafficking from occurring within its group’s business and supply chain. WGHL 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**”).

WGHL’s trading businesses monitor their supply chains ensuring all its key suppliers either sign up to Westcoast Group’s own third party code of conduct or have an equivalent/compatible code of ethics when dealing with customers. This reflects the business’s commitment to acting ethically and with integrity in all its business relationships. The Group has a zero tolerance approach to modern slavery and human trafficking.

*“Westcoast Group is wholly committed to eliminating Modern Slavery and Human Trafficking and ensures compliance with its legal responsibility. But beyond that as a leading technology distributor, Westcoast Group has a moral responsibility to ensure all its suppliers are equally committed”, Sunil Madhani, Westcoast Group, Chief Financial Officer.*

### 2: Structure of the organisation

WGHL is the ultimate parent company of the Westcoast group of companies (the “**Westcoast Group**”). WGHL was incorporated at Companies House on 28 January 2021 and became part of the Westcoast Group on 1 May 2021. WGHL does not trade and has no employees. Sitting just below WGHL in the Westcoast Group is Westcoast (Holdings) Limited (“**WHL**”), previously the parent management company of the Westcoast Group. WHL is 100% owned by WGHL. WHL owns all the other Westcoast Group companies.

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

The Westcoast Group has an annual turnover of £3.4 billion (and forecasted £4.3 billion with the below mentioned acquisition of Binnian and Komsa\*). All companies currently within the Westcoast Group have a financial year end of 31st December.

The Westcoast Group is British owned. WGHL, WHL and WL are all registered at the group’s head office in Theale, UK.

\*On 13 October 2023, WHL acquired a group of companies registered in Ireland. Binnian Ltd (“**Binnian**”) is the non-trading holding company. Binnian’s subsidiary is Datapac Ltd (“**Datapac**”) based in the Republic of Ireland. Datapac Limited is the main trading company and in FY22 had a turnover of 56 million Euros and as at 31 Dec 2023 had 83 employees. Datapac Business Solutions Ltd based in the Republic of Ireland and Datapac (N.I.) are trading subsidiaries of Datapac, with no employees.

WHL commenced a programme of share purchase in a German-based subsidiary KOMSA AG (“**Komsa**”). On 9 January 2025, WHL will own 99.98% in Komsa.

### 3: Business of the Westcoast Group subsidiaries and its supply chains

As at 31 December 2023, the Westcoast Group employed 1201 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 the UK's largest distributor of technology products and works with a wide range of suppliers including the best known names in technology and many smaller suppliers. These include manufacturers of personal computers, screens, accessories, printers, electronic office supplies, enterprise computing, storage and networking and software.

WL was incorporated at Companies House on 16 May 1984. It's main offices are in Theale and Nottingham with warehouses in Theale, Andover and Milton Keynes. [www.westcoast.co.uk](http://www.westcoast.co.uk)

Westcoast Cloud (<https://www.westcoastcloud.co.uk/>) is the trading division for cloud computing software and is part of WL.

Data Select (a trading division of WL) is one of the UK's leading end-to-end mobile and tech solutions providers. 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. <https://www.dataselect.com/>

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/>. As at 31 December 2023, Art had 79 employees.

Clarity is a distributor of goods and services in the IT sector. Clarity was incorporated in 1990. As at 31 December 2023, Clarity had 34 employees in Dublin, Ireland and operate principally in Ireland (with some minor trading in the UK): <https://www.westcoastireland.ie/>.

Westcoast France distributes IT products to IT Resellers and major retailers. As at 31 December 2023, Westcoast France employed 104 people in France and had 17 temporary staff. Westcoast France's key suppliers are based exclusively in continental Europe. <https://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:

- A Third Party Code of Conduct (the "Code") which includes provisions on slavery and human trafficking and ensures any third party Westcoast Group deals with adheres to the principles of this Code as a minimum standard [CodeofConduct171122new.pdf \(westcoast.co.uk\)](#).

- During 2023, we have updated all our precedent agreements to refer to compliance with our Code and contractually require all third parties the Westcoast Group deal with adhere to standards no less than those in our Code.
- Our standard distribution agreement (which we ask new vendors to sign) contains specific anti-slavery provisions and confirms adherence to our Code.
- WL's standard terms of purchase ([https://www.westcoast.co.uk/about-us/Standard\\_Terms\\_of\\_Purchase.html](https://www.westcoast.co.uk/about-us/Standard_Terms_of_Purchase.html)) 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 stating they must 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 processes

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

Our procedures are designed to:

- establish and assess areas of potential risk 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. We have recently updated and improved our internal whistleblowing policy.

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. Passport checks are undertaken for all employees, temporary workers and contract staff.

We use posters across our sites to assist with educating employees on Modern Slavery and the importance of reporting concerns.

## 7: Risk assessment and measuring effectiveness

Westcoast Group 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. Attendance at these meetings require a senior representative from each group company to ensure a unified approach across the group and to learn from the wider experience of the Westcoast Group.

We 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.

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.

## 8: Training and Further Actions

We 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.

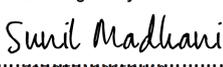
- All new employees undergo an Anti-slavery awareness course as part of their induction process (including adherence to our Code).
- WL has established a high level training program focused on the MSA which was developed for inclusion within our Learning Management System, which is compulsory for all current employees and permanently accessible by any employees for ongoing training. As part of our commitment to improve our practices, the Anti-Slavery Awareness course was last reviewed and updated in November 2023.
- Throughout 2024, Westcoast Group will work with the newly acquired Datapac to ensure they are fully integrated into the Westcoast standards and that where necessary they adopt the policies and procedures Westcoast Group has put in place in relation to anti-slavery and human trafficking.
- On 1 January 2023, Germany implemented it's equivalent of the MSA, the German Act on Corporate Due Diligence Obligations in Supply Chains ("LKSG"). As Komsa has over 1000 employees, it will be required to adhere to the provisions outlined in the LKSG from 1 January 2024. The LKSG is designed to safeguard human rights and the environment by obligating businesses to uphold social and ecological standards throughout their supply chains. Komsa shall regularly assess its suppliers using a systematic approach based on their location and industry, and conduct concrete reviews, particularly when specific indicators suggest inadequate standards. In its annual report, Komsa will provide information on the fulfilment of corporate due diligence obligations under the LKSG. LKSG compliance is falling under the responsibility of Komsa's Legal, Compliance, and Risk Department. We will aim to work collaboratively with Komsa in the fight against slavery and report on Komsa's efforts in our next annual statement, once WHL has completed its share purchase of Komsa.

In 2024, we will continue to review whether Westcoast Group can improve on existing measures or take any additional steps to combat 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 2023.

WHL, WL, Art Systems, Clarity, and Westcoast France's Boards have all approved this statement for the Westcoast Group with the final approval from the WGHL Board on 7 February 2024.

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Signed by: 22E0FE1C885C4A3.....

Sunil Madhani,

Director for and on behalf of WGHL, WHL, WL, Art Systems, Clarity, Westcoast France, Binnian and Datapac

Date: 9th February 2024