

# **WESTCOAST MODERN SLAVERY STATEMENT**

**For the period 1st January 2025  
to 31st December 2025**

## **Westcoast Anti-Slavery Statement for the period 1<sup>st</sup> January 2025 to 31st December 2025**

### **1: Introduction**

Modern Slavery and Human Trafficking are illegal, iniquitous practices, a violation of human rights and have no place in the world. Westcoast Holdco Limited (“**WHL**”) is committed to both preventing acts of modern slavery and human trafficking from occurring within the businesses that it is responsible for and their associated supply chains. WHL provides this public statement on behalf of the Westcoast Division (as defined below) in accordance with section 54 of the Modern Slavery Act 2015 (“**MSA**”).

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

*“Westcoast Division 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 Division has a moral responsibility to ensure all its suppliers are equally committed”, Sunil Madhani, Westcoast Division, Chief Country Officer.*

### **2: Structure of the organisation**

On 28 February 2025, WHL and its subsidiaries became part of the ALSO group, whose ultimate parent is ALSO Holding AG (the “**ALSO Group**”) which is registered in Switzerland and listed on the SIX Swiss Exchange. This statement covers WHL (a non-trading holding company) and its subsidiaries as detailed below (the “**Westcoast Division**”) along with ALSO Cloud UK Limited (collectively referred to as “**Westcoast**”).

During 2025, WHL had the following subsidiaries within the UK and Republic of Ireland with a turnover in excess of £36 million: Westcoast Limited (“**WL**”) Clarity Computer (Distribution) Limited trading as Westcoast Ireland (“**Clarity**”) and Spire Technology Limited (“**Spire**”). As at 31 December 2025, the Westcoast Division had an annual turnover of £3.523bn.

### **3: Business of the Westcoast and it’s supply chains**

As at 31 December 2025, Westcoast employed 1051 people across business operations in the UK, Republic of Ireland and Mainland Europe. Westcoast provides 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 and its registered office is in Theale (UK). WL also has an office in Nottingham and warehouses in Theale, Andover, Milton Keynes, Germany and Spain. As at 31 December 2025, WL employed 937 people: [www.westcoast.co.uk](http://www.westcoast.co.uk).



Clarity is a distributor of goods and services in the IT sector. Clarity was incorporated in 1990 and its registered office is in Dublin (Republic of Ireland). As at 31 December 2025, Clarity had 32 employees in Dublin and operated principally in Ireland (with some minor trading in the UK):

<https://www.westcoastireland.ie/>.

During 2025, Spire was one of the UK's leading distributors of computer components, peripherals and consumer electronics products: [www.spire.co.uk](http://www.spire.co.uk). At the time of publishing this statement, Spire's business and assets had transferred to WL.

ALSO Cloud UK Limited (“**ALSO Cloud**”) is a distributor of cloud computing software. ALSO Cloud's registered office is in Theale (UK).

## 4: Westcoast'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 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 expects suppliers and other business partners to uphold high standards in their business practices.

## 5: Practices of Westcoast Division

As part of Westcoast Division'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 Division deals with adheres to the principles of this Code as a minimum standard [Third Party Code of Conduct](#).
- Our precedent agreements refer to compliance with our Code and contractually require all third parties the Westcoast Division 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. This allows us to contractually terminate our relationship with a distribution partner should they breach any modern slavery obligations, however we have not had to utilize this provision to date.
- WL's standard terms of purchase ([Westcoast - Standard Terms of Purchase](#)) and standard terms of sale ([Westcoast - Standard Terms of Sale](#)) refer to suppliers and customers respectively adhering to the MSA and our Code.
- If suppliers or customers 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 and customers 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.

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 Division 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 company in the Westcoast Division to ensure a unified approach and to learn from the wider experience of the Westcoast Division.

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).
- Westcoast Division has 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 to complete 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 February 2024.

- During 2025, Westcoast created and implemented a training module on whistleblowing within our annual compliance curriculum which all employees are required to complete. This module has been designed to emphasise the importance of our culture of ‘doing the right thing’ and encouraging employees to report any concerns via our whistleblowing procedure.
- Westcoast Division will work with ALSO Cloud to ensure they implement the Westcoast Division standards and that where necessary they adopt the policies and procedures Westcoast Division has put in place in relation to anti-slavery and human trafficking.

In 2026, we will continue to review whether Westcoast Division can improve on existing measures or take any additional steps to combat slavery considering the Home Office’s Transparency In Supply Chains statutory guidance and assess how best the suggested measures can be implemented.

## 9: Sign-off

This statement is made in accordance with section 54(1) of the MSA and constitutes Westcoast Division’s Anti-slavery and human trafficking statement for the financial year ending 31 December 2025.

The WHL Board approved this statement for the Westcoast Division on 16 April 2026.

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*Sunil Madhani*  
Signed by: .....22E0FE1C883C4A3.....

Sunil Madhani, Date: 16 April 2026

Director for and on behalf of WHL, WL, Clarity, Spire and ALSO Cloud