

COMPUTACENTER plc

Anti-Bribery and Corruption Code of Conduct

Computacenter is committed to compliance with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act, promulgated in April 2010. Additionally, in 2007, the Group visibly committed to adhere to the 10 core principles of the United Nations Global Compact, where the tenth principle specifically commits us to impeding all forms of corruption, including extortion and bribery. However, it has always been Computacenter's policy not to tolerate any dishonest behaviour, since it is part of our culture that Computacenter wants to carry out its business fairly, honestly and transparently. This is the primary reason for this Code of Conduct and accordingly, **we:-**

- **will not** make bribes, nor will we condone the offering of bribes on our behalf, in an attempt to try and gain business or personal benefit, or in an attempt to motivate another to act improperly;
- **will not** accept bribes, nor will we agree to them being accepted on our behalf;
- **will** avoid doing business with others who may harm our reputation by not respecting these values;
- **will** set out our processes for avoiding bribery, directly or indirectly; (*see the Anti-Bribery and Corruption Policy*)
- **will** recognise that certain donations, hospitality and gifts, either given or received, may be considered inappropriate in certain instances and we will all apply our minds to ensure that our motives remain to carry out our business, fairly, honestly and transparently; (*see the Hospitality, Gifts, Entertainment Policy and the Charity Donations Policy*)
- **will** make sure that everyone in our business, including our business partners and major suppliers know about our principles and we will require all relevant staff to commit to this Code of Conduct and the related Policies;
- **will** regularly review this Code of Conduct and related Policies, followed by further communication to all relevant staff, major suppliers and partners;
- **will** ensure that there are communication channels for all employees, partners and major suppliers through which they will be able to report instances of suspected dishonest behaviour; and (*see the Anti-Bribery and Corruption Policy and the Whistle Blowing Policy contained within the Business Ethics Policy*)
- **will** maintain clear and accurate records of all reports and investigations regarding suspected dishonest behaviour.



Mike Norris

Group CEO – December 2010