



**CDW LIMITED
MODERN SLAVERY STATEMENT
2023**



CDW LIMITED MODERN SLAVERY STATEMENT FY23

CDW is a leading multi-brand technology solutions provider in the UK, the U.S. and Canada, servicing customers' needs in over 160 countries across the world. We undertake a wide range of IT engagements, including the purchase of products for resale to our customers, either directly from suppliers or from wholesale distributors. We vet and carefully select the organisations we work with in the creation of supply chains to deliver optimal outcomes to our customers.



**CDW International
logistics successful for
30 years**

**Shipping to over 160
countries**

**Stock holdings &
logistics management**

**Customized supply chain
management**

**Standard & fully-
managed DDP Service**

CDW Commitment

At CDW, **we make technology work so people can do great things**. Those great things include collaborating with our coworkers, customers, technology partners and communities to improve the environment, create positive social impact and live and operate in a more sustainable and ethical world.

CDW is committed to a work environment that is free from human trafficking, slavery and unlawful child labour in its supply chains. Our commitment to environmental and social responsibility and our respect for human rights is reflected in the values and high standards of ethics expressed in the [CDW Way Code](#)¹ (our code of business conduct and ethics) and our Partner Code of Conduct, as well as in other policies and employment practices throughout the Company. These standards remain at the core of every decision CDW makes, including decisions about its supply chain. Through our partnerships with suppliers and distributors that share our values, CDW encourages socially responsible citizenship.

CDW Operational Measures and Controls

CDW purchases products for resale to our customers either directly from suppliers or from wholesale distributors. CDW partners with suppliers and distributors who share our commitment for ensuring that supply chains reflect CDW's high standards for business ethics, integrity and respect for human rights. CDW identifies and utilizes suppliers who share CDW's commitment to ensuring the absence of slavery and human trafficking.

CDW expects its suppliers to operate their businesses in compliance with all applicable laws, including those related to employment and labour, and to maintain lawful environmental, health, and safety practices that meet or exceed all applicable laws and standards. CDW relies on its suppliers to self-audit or monitor their supply chains. CDW does not require written certifications from all suppliers expressly confirming and verifying their compliance with slavery and human trafficking laws, but retains the right to discontinue its relationship with any CDW supplier or business partner who does not comply with any law or labour standard.

To further ensure that CDW's supply chain reflects its standards for business ethics, integrity and respect for human rights reflected in the CDW Way Code, CDW has internal accountability standards and procedures for coworkers and contractors who fail to meet these standards, up to and including termination of employment and of the supplier's contract with CDW.

CDW also conducts ongoing training for our coworkers on the CDW Way Code, which includes training on respect for coworkers and practices for ensuring a workplace free of harassment and unlawful discrimination. CDW also maintains an Ethics Helpline, available 24 hours a day, 365 days a year, for anyone to report possible violations of law, the CDW Way Code, or other policies by coworkers and other third parties, including suppliers.

¹<https://www.cdw.com/content/cdw/en/about/overview/code-of-conduct.html>

Risks of Modern Slavery

Due to the nature of our business, internal controls, policies, training and people, we consider our business to be at a low risk of modern slavery and trafficking.

CDW UK & International Supply Chain Measures & Controls

We operate a stringent process for selecting and continuously reviewing our suppliers. As a reseller, we also require our suppliers to conduct self-audits and monitor their supply chains. Our framework approach encompasses the following key components:

- ❖ **Supply chain policies, procedures and review methodology**
 - **Comprehensive onboarding process:** ensuring that new suppliers are appropriately vetted before engagement, including assessments of their modern slavery policies and evaluations of risk, based on geography and products
 - **Adherence to our Partner Code of Conduct:** standard requirement for suppliers to align with our Supplier Code of Conduct, which outlines our expectations regarding labour practices and ethical behaviours
 - **Validation of suppliers' own policies and declarations:** regularly verifying that Tier 1 suppliers have robust policies in place that align with our standards and taking reasonable steps to ensure they provide accurate statements regarding their practices

- ❖ **Risk assessment criteria** (identifying higher risk territories): leveraging reputable external sources, such as the Global Slavery Index, as published by Minderoo Foundation's Walk Free initiative, to evaluate risks related to geographical labour practices, vulnerable populations, high-risk business models and high-risk categories

- ❖ **Annual review of Tier 1 and any higher risk suppliers:**
 - **Tier 1 Annual Review:** conducting detailed annual reviews of our primary suppliers to ensure ongoing compliance with our standards and to identify any emerging risks or issues
 - **Evaluation of Higher-Risk Suppliers:** performing additional annual reviews on suppliers operating with higher-risk indices, ensuring they meet our stringent requirements and taking reasonable steps to address any areas of non-compliance

We retain the right to discontinue our relationship with any of our suppliers or business partners who do not comply with any law or labour standard. We expect our suppliers to operate their businesses in compliance with all applicable laws, including those related to employment and labour, and to maintain lawful environmental, health and safety practices that meet or exceed all applicable laws and standards.

CDW's Supplier Code of Conduct

[CDW's Partner Code](#)² addresses four critical areas of conduct:

- (1) **Integrity and Ethics:** which includes anti-corruption, fair competition, protection of information, conflicts of interest, trade laws compliance, insider trading and truthful advertising and marketing practices
- (2) **Human Rights, Labour Laws and Fair Labour Practices:** which covers maintaining a work environment and supply chain that are free from human trafficking, slavery and unlawful child labour, and that do not discriminate on the basis of race, colour, religion, national origin, gender, sexual orientation, gender identity, disability, age, marital status, pregnancy or any other characteristic protected by law
- (3) **Environment:** which affirms our commitment to operate in a manner that is protective of the environment by identifying impacts and proactively minimizing adverse effects on the community and natural resources and complying with all applicable laws, regulations and standards
- (4) **Professional Conduct:** which states that CDW will not tolerate any form of harassment, and expects partners to treat CDW coworkers with the same dignity and respect that they would show to their own employees

Compliance with our CDW Partner Code is achieved primarily through frequent communication with our partners. Anyone who has concerns or observes questionable behaviour is encouraged to use one of the feedback channels outlined in the Partner Code. Any minor infractions may be remedied through direct intervention and coaching. We reserve the right to terminate any agreements with partners that incur multiple violations or elect not to comply with our expectations for good conduct.

² <https://www.cdw.com/content/cdw/en/about/overview/code-of-conduct/conduct-business-ethically/business-partners.html>

Continual Improvement Regime and Future Growth

We operate a Continual Improvement regime (as required by and defined within ISO 9001:2015, to which CDW was accredited during the reporting year and at the date of signature of this statement) to ensure that the audit activities challenge the existing measures and approaches so that we continuously enhance our position to combat modern slavery and are aware of any developing trends.

We are constantly striving to improve our contributions through our environmental, social and governance (ESG) sustainability programmes which are embedded in our day-to-day activities and business culture. Further information is available in our [2023 ESG Report](#)³. We focus on our social impact, supporting a wider range of initiatives for both ourselves and our supplier community.

This is exemplified by our commitment: ***We make technology work, so people can do great things.***

This statement fulfils the requirements of Section 54 (Transparency in supply chains) of the Modern Slavery Act 2015 and covers the financial year from 1 January to 31 December 2023.



Signed by J.D. Hupp on behalf of the CDW Limited Board of Directors
Date: 27-Jun-2024

³ <https://webobjects2.cdw.com/is/content/CDW/cdw/on-domain-cdw/cdw-branded/esg/cdw-2023-esg-report-final.pdf>