CDW Modern Slavery Statement 2025

CDW Activities

CDW is a leading multi-brand technology solutions provider in the UK, the U.S. and Canada, servicing customers' needs in over 170 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 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 operate in a more ethical world.

We are committed to a work environment that is free from human trafficking, slavery and unlawful child labour in both our own operations and our supply chains. Our commitment is reflected in the values and high standards of ethics expressed in the CDW Way Code (our code of business conduct and ethics), as well as in other policies and employment practices throughout the Company. These business cultural standards remain at the core of every decision we make, including our supply chain. We are committed to continuous improvement in all our approaches. Our approaches are subject to regular review and validation.

CDW Operational Measures and Controls

Internally within CDW, across all of our regions, we have policies and structures related to the recruitment and allocation of activities that fosters the high ethical standards which are underpinned by the CDW Way Code. We conduct 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.

We also maintain 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 co-workers and other third parties, including suppliers.

CDW Supply Chain Measures & Controls

We operate a rigorous process of supplier selection and subsequent review. Our framework approach is outlined below, but as a reseller rather than a manufacturer, we also expect our suppliers to self-audit and monitor their supply chains:

- **Supply chain policies, procedures, review methodology**
  - Onboarding
  - Supplier code of conduct
  - Validation of suppliers' own policies and statements

- **Risk assessment criteria** (identifying higher risk territories and utilising information from external sources such as the Global Slavery Index (published by Minderoo Foundation's Walk Free initiative)

- **Annual review of Tier 1 and any higher risk suppliers**

- **Audit regime** (spot audit and detailed assessment of a sample range of suppliers)

We do not require written certifications from suppliers expressly confirming and verifying their compliance with slavery and human trafficking laws outside of general contractual obligations to provide products and services in compliance with all applicable laws, but 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 Partner Code 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, disability, age, veteran status 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, including CDW's Ethics Helpline. 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.

Continual Improvement regime and future growth

We operate a Continual Improvement regime (as required by and defined within ISO 9001:2015, to which CDW is accredited) 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.

Actions for 2025/26

In this financial year we will build upon what we already have in place by:

- Refreshing our Modern Slavery Risk Assessment
- Creating tailored training for our business on Modern Slavery Risk and rolling it out in our highest risk territories

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 2024 to 31 December 2024.

Penny Williams (Jun 26, 2025 22:02 GMT+2)

Date: 30/06/2025

Signed by Penny Williams on behalf of the CDW Limited Board of Directors