



Frequently Asked Questions

ABOUT NAVEX

What is NAVEX?

NAVEX is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like NAVEX?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximise productivity.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

REPORTING - GENERAL

May I report using either the Internet or the telephone?

Yes. With NAVEX, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The NAVEX system is designed for employees to report any violation of our stated Code of Conduct or another concern you may have, such as concerns about bribery, fraud, modern slavery or staff conduct. This can also include concerns you have about partners and other companies in the supply chain.

When would I file a report using the Westcon-Comstor Hotline?

Under most circumstances, the most effective means of reporting a concern is to contact your immediate manager or local human resources (HR) representative. Calling the Westcon-Comstor Ethics and Compliance Hotline is the next best alternative to reporting a concern. This hotline is hosted by NAVEX, a global third-party hotline provider. Using this hotline will ensure confidentiality of your concern. Please note that NAVEX provides the option for any report you file to be done so on an anonymous basis. There may also be situations where you believe it is necessary to call the Westcon-Comstor hotline. In those cases, the contact number is +27 31 308 0680.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behaviour you believe violates our Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or another member of our management team. We recognise, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances we have partnered with NAVEX. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment. With that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in Westcon-Comstorboth good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise the potential negative impact on Westcon-Comstor and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly to a NAVEX secure server to prevent any possible breach in security. NAVEX makes these reports available only to specific individuals within the Westcon-Comstor who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Isn't this system just an example of someone watching over me?

The NAVEX system concentrates on being a positive aspect of our overall philosophy and allows us to ensure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication. We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

REPORTING SECURITY & CONFIDENTIALITY

It is my understanding that any report I send from a Westcon-Comstor computer generates a server log that shows every website my PC connects with; won't this log identify me as a report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to NAVEX is available. In fact, NAVEX is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, the library, at a friend's house, etc.) through the NAVEX secure website. Many people choose this option, as NAVEX's data shows that fewer than 12% of reports generated during business hours.

Can I file a report from home and remain anonymous?

A report from home, a neighbour's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the NAVEX system strips away identifying information, such as an IP address, so that anonymity is maintained. Plus, NAVEX is contractually committed not to pursue a reporter's identity.

I am concerned the information I provide NAVEX will ultimately reveal my identity. How can you assure me that will not happen?

The NAVEX system is designed to protect your anonymity. In fact, we are contractually committed not to pursue a reporter's identity. To further ensure your anonymity, you - as a reporting party - need to be careful not reveal any identifying details as part of your report. For example, "from my cube next to Jan Smith ... " or "in my 33 years ... "

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information you would provide in an Internet-based report; the interviewer will type your responses directly into NAVEX's secure environment. Hotline-based reports have the same security and confidentiality measures applied to them during delivery as Internet-based reports.

What if I want to be identified with my report?

There is a section in the report where you may identify yourself if you wish.

TIPS & BEST PRACTICES

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company chooses to promote ethical behaviour. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. One only has to consider what happened in recent corporate scandals to see the disastrous effects a seemingly harmless lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your co-workers to report it.

I am not sure if what I have observed or heard is a violation of Westcon-Comstor policy or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because you were unsure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The NAVEX system and report distribution protocols are designed so implicated parties are not notified about or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report?

When you file a report, either using the Internet or through NAVEX's Contact Centre, you receive a unique report key and are asked to select a password. With the report key and your password, you can return to the NAVEX system again, either by Internet or telephone, and access the original report. At that point, you can add more details.

What if you have questions for me concerning my report?

NAVEX provides functionality that enables Westcon-Comstor representatives to post questions for you, even if you report anonymously. When you receive your report key, you will be provided with the amount of time we expect for the report to be processed. When that time has passed, we strongly suggest you check to see if any questions have been posted. Providing the opportunity for such anonymous dialogue means situations may not only be identified but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All NAVEX correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity, if you so choose.

Can I still file a report if I don't have access to the Internet?

You can file a NAVEX report from any computer that can access the Internet. You can file from home. Many public locations, including most public libraries, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the Westcon-Comstor hotline by visiting this <u>link</u>.