

Modern Slavery Statement 2021

Modern slavery is a serious crime and violation of fundamental human rights, with no place in modern society. At Sterling, we believe modern slavery is a global challenge that requires a global response and are committed to leading by example. **The Sterling Way**. . . Consistent. Transparent. Predictable. Ethical.

This Statement covers the period from January 1, 2021 to December 31, 2021 and is made pursuant to the requirements of the United Kingdom Modern Slavery Act, the California Transparency in Supply Chains Act, and FAR 52.222-50 (Combating Trafficking in Persons).

Organizational Structure

Sterling is an information-technology company and Value-Added Reseller Plus (VAR+) with over two decades of experience fulfilling procurement requirements for customers in the government, education, and commercial sectors. Our global corporate headquarters is located in North Sioux City, South Dakota, making Sterling the largest tech company in the State of South Dakota (USA).

Sterling Computers Corporation is a private company incorporated in the State of California (Entity No. C1976745) with principal address at 303 Centennial Drive, North Sioux City, SD 57049. This statement also applies to Sterling's wholly owned subsidiary, Sterling Computers Corporation (UK) LTD, a limited liability company registered in England and Wales with registered number 13862089 and with registered office at 2nd Floor, 55 Ludgate Hill, London, EC4M 7JW. The terms "Sterling", "Sterling Group", "we", "us" and "our" as used in this Statement refers to Sterling and its wholly owned subsidiary.

Organizational Policies

Sterling has adopted a zero-tolerance approach to modern slavery. All Sterling employees, contractors and agents are required to comply with Sterling's modern slavery standards and are prohibited from engaging in any activity inconsistent with these standards. Additionally, all Sterling suppliers are expected to implement a zero-tolerance approach to modern slavery pursuant to FAR-52.222-50, as required.

Supply Chain Due Diligence and Risk Management

Verification and risk assessment: Currently, we do not engage in verification of our product supply chains to evaluate and address risks of modern slavery.

Audits: Currently, we do not conduct audits of suppliers to evaluate supplier compliance with standards for modern slavery.

Certification: A clause is included in Sterling's standard commercial agreements governing our contractual relationship with our contractors, which requires the contractor, and the contractor's employees, subcontractors, representatives and agents, to comply with applicable law relating to human rights, labor rights, child labor, and human trafficking, and with Sterling's and its customer's standards of business ethics and conduct. The contractor is also required to represent and warrant that it will at all times comply with the provisions of the agreement and with applicable law. Additionally, we

include the substance of FAR 52.222-50 in contracts governing our contractual relationship with our contractors, as required.

Training and Internal Accountability

Internal Accountability: Non-compliance with Sterling's modern slavery standards will result in action being taken against the employee up to, and including, termination of employment. Additionally, Sterling has a process for employees to report activity inconsistent Sterling's modern slavery standards, and we provide employees with processes for reporting both internally and externally to the Global Human Trafficking Hotline.

Training: We currently do not provide employees with training on modern slavery. We are currently reviewing our procurement process, risk management, and supplier due diligence measures to ensure training and guidance is provided to those who have responsibility for supply chain management are provided training and guidance to mitigate risks of modern slavery within the supply chain.

Effectiveness

Over the next 12 months we will review our effectiveness in ensuring that modern slavery is not taking place in our business or supply chain by:

- Raising awareness across Sterling of the ethical requirements that we expect them to comply with, and the actions that will be taken for violations.
- Developing a Supplier Code of Conduct to inform our suppliers of the ethical requirements that we expect them to comply with, and the actions that will be taken for violations.
- Strengthening our supplier due diligence processes to prevent our suppliers at all tiers and at any dollar value from engaging in modern slavery, and to ensure the products we purchase are of good sustainable quality and ethically sourced.
- Strengthening our procedures to ensure we remain alert to any potential risks of modern slavery within our business and our supply chain.
- Implementing appropriate performance indicators to assess the effectiveness of our measures in ensuring that modern slavery is not taking place in our business or supply chain.

Approval and Signature

This Statement has been approved by Sterling's Board of Directors.

Jean M. Moore signs this Statement as Executive Chairman and Director on behalf of the Sterling Group, and in her capacity as Director of Sterling Computers Corporation (UK) LTD.



Jean M. Moore

Executive Chairman & Director