

## MODERN SLAVERY STATEMENT

Modern slavery is a serious crime and violation of fundamental human rights, with no place in modern society. At Sterling Computers Corporation (“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.

Each year within six months following Sterling’s financial year-end, we prepare our modern slavery statement describing the extent of our efforts to deal with modern slavery risks during the preceding financial year. This Statement constitutes our modern slavery statement covering the financial year ending December 31, 2023, and is made pursuant to the United Kingdom Modern Slavery Act, the California Transparency in Supply Chains Act, and FAR 52.222-50 (Combating Trafficking in Persons).

### ORGANIZATIONAL POLICIES

Sterling has adopted a zero-tolerance approach to modern slavery. All Sterling employees, suppliers and agents are expected to comply with Sterling’s modern slavery standards and are prohibited from engaging in any activity inconsistent with these standards. Additionally, our suppliers are expected to uphold and protect human rights and vulnerable workers, and prohibit modern slavery, and implement a responsible sourcing and compliance program, as required by applicable law.

### SUPPLY CHAIN DUE DILIGENCE AND RISK MANAGEMENT

**Verification and risk assessment:** We internally evaluate potential and current suppliers. Sterling reserves the right to engage verification measures to evaluate and address supplier compliance with Sterling’s standards.

**Audits:** We have an internal team responsible for annually evaluating particular suppliers’ compliance with Sterling’s standards including having particular suppliers complete required assessments and compliance plans, such as annual representations and certifications and conflicts minerals reports.

**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, including to Sterling’s anonymous ethics reporting hotline and to the Global Human Trafficking Hotline.

**Training:** Sterling conducts internal trainings relating to our risk management policies, procedures, and activities.

## **MOVING FORWARD**

Over this next financial year we will continue to review and strengthen our risk management policies, procedures, and activities, and our overall effectiveness in ensuring that modern slavery is not taking place in our business or supply chain. We currently envision our key focuses will be:

- Raising awareness across Sterling of the expectations relating to a range of compliance and ethical requirements, including those related to modern slavery, and the actions that will be taken for failure to meet such expectations.
- Strengthening our enterprise risk management and supplier due diligence policies and procedures, including developing our documentation memorializing such policies and procedures and our expectations relating thereto.

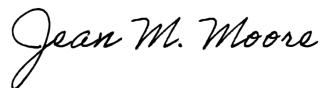
## **ORGANIZATIONAL STRUCTURE**

Sterling is an information-technology (IT) 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, South Dakota 57049. This statement also applies to Sterling's wholly owned subsidiary, Sterling Computers Corporation (UK) Ltd, a private limited company organized in England and Wales (Company No. 13862089) with registered office at 5 The Green, Richmond, England TW91PL. The terms "Sterling", "Sterling Group", "we", "us" and "our" as used in this Statement refers to Sterling and its wholly owned subsidiary.

## **Approval and Signature**

I sign this Statement as commitment to the principles of protecting human rights and vulnerable workers, prohibiting modern slavery, and ensuring responsible sourcing and transparency in supply chains. This Statement has been approved by Sterling's Board of Directors. I sign this Statement as Executive Chairman of Sterling Computers Corporation and as Director of Sterling Computers Corporation (UK) Ltd.



Jean M. Moore  
Executive Chairman & Director

May 1, 2024