

CDW PARTNER CODE OF CONDUCT



At CDW, we are committed to running our business with honesty, integrity and the highest level of ethical standards. Our values are the reason why CDW has been able to establish and maintain trust with our customers, coworkers, business partners, shareholders and communities. As you know, our partners play a vital role in serving our customers and our mission and, as such, we expect our partners to join us in conducting themselves with the highest standards of honesty, fairness and integrity; operate in full compliance with all applicable laws and regulations, and to adhere to the principles outlined in this Partner Code of Conduct. This Code sets the standards of behavior we expect our partners to hold while conducting business with CDW and CDW's coworkers, agents, subcontractors and customers.

As used in this Partner Code of Conduct, "We" refers collectively to CDW and our partners. Please take a few moments to review the expectations below. If you have any questions or would like to discuss any aspect of this in more detail, we welcome the conversation.



Integrity and Ethics

We will operate our business with the highest standards of integrity, in compliance with all laws and regulations, and consistent with the principles outlined below:

- **Anti-Corruption:** We will comply with all applicable anti-corruption and anti-money laundering laws. CDW does not tolerate payments of bribes, kickbacks or extortion of any kind, whether in dealings with government employees or individuals in the private sector.
- **Gifts & Entertainment:** We will not provide or accept business gifts, entertainment or anything of value to or from any person or organization that is intended to improperly influence or reward an action or decision.
- **Fair Competition:** We will compete fairly and honestly for business. CDW prohibits any type of action or agreement to fix prices, divide markets or engage in any other anti-competitive practices.
- **Protection of Information:** We will respect intellectual property rights, protect confidential information and comply with privacy rules and regulations. We will maintain the confidentiality and security of sensitive information of our customers, suppliers and business partners.
- **Government Customers:** We will live up to the additional legal and regulatory requirements related to transactions with government customers.
- **Conflicts of Interest:** We will maintain a partnership free of conflicts of interest. Should such a situation arise between our companies or any of our employees, CDW asks that you report all pertinent details to CDW. Conflicts of interest include, but are not limited to, close personal or family relationships or the giving or receiving of lavish business courtesies.
- **Trade Compliance:** We will conduct global business in strict compliance with applicable international trade laws.
- **Insider Trading:** Our interactions may result in access to material, nonpublic information about CDW or another company (including CDW's customers, suppliers and other business partners). We shall not engage in any action to take advantage of that information, including buying or selling CDW's or another company's securities or sharing that information with others.
- **Marketing Practices:** Our advertising and marketing activities will be conducted truthfully, accurately and in accordance with applicable law, rules and regulations. CDW partners must ensure that all communications to its customers will be truthful, accurate and not misleading.



Human Rights, Labor Laws and Fair Labor Practices

We will provide a safe and healthy work environment (including any company-provided living quarters), fully compliant with all employment, environmental, health and safety laws with a commitment to inclusion, diversity and equal opportunity employment.

- We will maintain a work environment and supply chain that is free from human trafficking, slavery and unlawful child labor.
- We will insure a workplace with appropriate controls, safe procedures, preventative maintenance and appropriate protective equipment in compliance with all applicable laws and regulations.
- We will not discriminate on the basis of race, color, religion, national origin, gender, sexual orientation, gender identity, disability, age, veteran status or any other characteristic protected by law.



Environment

We will operate in a manner that is protective of the environment.

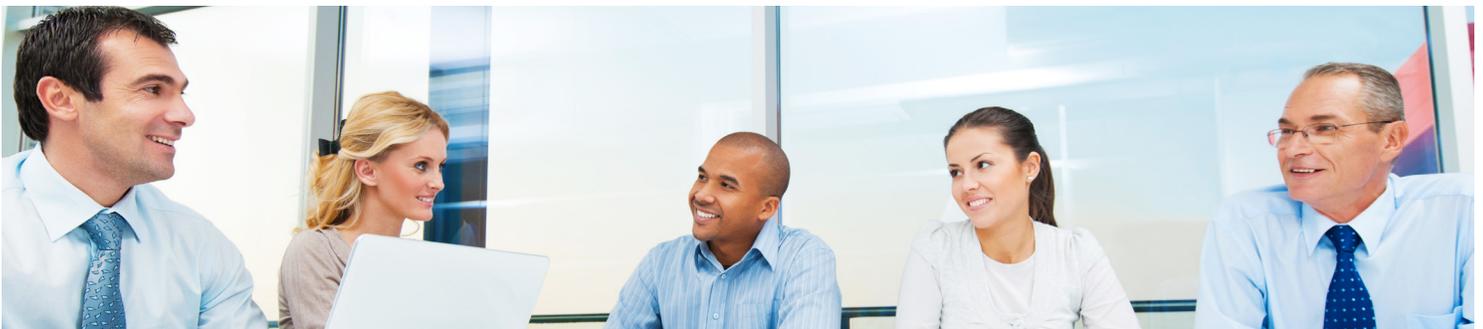
- We will identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within our operations, while safeguarding the health and safety of the public and promoting reuse and recycle programs.
- We will comply with all applicable environmental laws, regulations and standards such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.
- We will take measures to conserve energy, reduce water consumption in areas of water stress or scarcity and strive to measure and report our operational greenhouse gas emissions on a periodic basis.



Professional Conduct

We will maintain an inclusive, productive, respectful and professional environment, free from any forms of discrimination or harassment.

- We will treat CDW coworkers with the same dignity and respect that they would show to their own employees. CDW will not tolerate any form of harassment.
- We will behave in a professional manner at any event sponsored or co-sponsored by CDW and/or where CDW coworkers are in attendance including responsible alcohol use and continued adherence to this Code of Conduct.



Reporting Concerns or Questionable Behavior

CDW's reputation for honesty, integrity and fair dealing has been earned through the efforts of many coworkers over many years and is one of CDW's most valuable assets. It only takes one misguided or inappropriate action to put this reputation at risk. If a partner suspects CDW's reputation is at risk or believes there is a violation of this Code of Conduct, share the concern directly with a CDW contact or with the partner's legal department and/or ethics and compliance officer. If this approach is not possible or appropriate, contact the CDW Ethics Helpline at 877.723.9929 or online at CDW.ethicspoint.com