



# Code of Business Conduct

Our Values in Action

# A Letter from John Engel



At Wesco, it's our mission to build, connect, power and protect the world. As a world leader in electrical, communications, utility distribution and supply chain services, Wesco's 18,000 employees collaborate with more than 30,000 supplier partners and 140,000 customers in more than 50 countries around the world. This global reach is a testament to the trust our customers put in us and our business every day.

Our reach and partnerships are also why our Code of Business Conduct is so important. It expresses Wesco's commitment to conducting business with the highest degree of honesty and integrity and lays the foundation for policies and procedures that provide direction on our legal and ethical responsibilities. The Code of Business Conduct is reviewed annually by our Board of Directors.

Each of us has a responsibility to follow Wesco's Code of Business Conduct and use it as our guide. This Code of Business Conduct is a promise we make not only to one another, but also to our business partners, customers, suppliers, shareholders and the communities we serve. We deliver our very best in all we do and act with integrity and excellence every step of the way.

We are all empowered to speak up and report any violations of this Code, related company policies or laws and regulations. We will not tolerate retaliation against anyone making a report in good faith or cooperating in an investigation. If you have questions or concerns about anything described in this Code of Business Conduct, I encourage you to ask for guidance by speaking with your manager or any other resource listed in the Contacts section at the end of the Code of Business Conduct.

Thank you for your commitment to our Code of Business Conduct and the high ethical standards that have shaped Wesco for the past century. People, our greatest asset, have helped build and maintain our reputation of integrity. Continuing to follow these standards will allow us to grow successfully today and in the years to come.

A handwritten signature in black ink that reads "John Engel". The signature is fluid and cursive.

**John Engel**  
*Chairman, President and  
Chief Executive Officer*



# Our Values in Action

Our values are the principles on which we base our interactions with suppliers, customers, shareholders, the communities in which we work and live, and each other. They are clear and simple, and they shape our actions every day at Wesco.



## Our Core5 Values

### **Our people are our greatest asset**

We support each other to reach our full potential, and we keep each other safe. We are empowered to speak up, knowing our voice will be heard, and we report any known or suspected behavior that could compromise the well-being of our co-workers or undermine our integrity, reputation or success.

### **Winning with customers and suppliers**

We build strong and mutually beneficial alliances with our customers and suppliers, establishing our partnerships firmly on good and ethical service. We follow through on our commitments and are trusted by all with whom we do business.

### **One team**

We foster effective teamwork and honest communication, and we listen to each other to build mutual understanding. We value diversity and work intentionally to maintain and strengthen our inclusive culture.

### **Always strive to be the best**

We deliver our very best in all we do. We always get the job done, acting with integrity and excellence at every step of the process.

### **Innovation**

We see change as an opportunity to improve and grow. We look for ways to continually innovate, execute, and transform how we do business through digitization.

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**Ask questions and raise concerns**

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)



## Code Approval, Updates and Waivers

The Wesco Board of Directors is responsible for approving and issuing the Code of Business Conduct. This Code was approved by the Wesco Board on December 8, 2022. The Board reviews the Code of Business Conduct annually to determine whether revisions may be appropriate. Any waiver of the Code of Business Conduct for the Chief Executive Officer, Chief Financial Officer, Controller, other senior financial or executive officers, or members of the Board of Directors must be approved by the Audit Committee.

## The Purpose of this Code

This Wesco Code of Business Conduct (the “Code”) is a guide for putting our values into action by helping each of us comply with the laws and ethical principles that govern our business. The Code applies to all directors, officers and employees of Wesco and its subsidiaries. It is not a comprehensive document and does not address every situation; we are expected to exercise good judgment and ask questions if we need guidance or clarification.

In many cases, the Code requires higher standards of ethical conduct than what is required by law. Employees and directors will, at a minimum, abide by both applicable laws and the standards of conduct in this Code.

Additional resources, such as policies, procedures, and guidelines supplement the Code and are listed throughout this Code. In addition, advice and guidance on how to implement the Code in our daily work are available from managers, the Wesco ethics and compliance office, human resources, legal department and the Business Integrity Line.

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## Your Responsibilities

**We are all role models when it comes to operating in an ethical way and with integrity, and we must:**

- Know and follow the guidance in this Code
- Foster a positive, inclusive work environment and a strong culture of ethics
- Complete assigned training and certifications on time
- Report suspected violations of law, the Code or company policies, unless prohibited by local law
- Avoid retaliation, and report suspected retaliation against anyone
- Cooperate with investigations

### Special role of managers

We pride ourselves on our open, caring and collaborative workplace where two-way communication between managers and employees is encouraged. Open communication helps ensure that we are alert for, and feel comfortable reporting, any potentially illegal or unethical conduct or situation.

**Every Wesco employee plays a role in maintaining our culture of integrity. Our managers have some additional responsibilities:**

- Lead by example in modeling our Code and guidelines in everything you do
- Demonstrate that integrity is a priority by driving and maintaining a work environment with the highest standards of ethical business conduct
- Create an environment where employees feel comfortable coming to you with questions and concerns
- Listen and promptly address or escalate reported concerns by following Wesco’s Escalation Guidelines
- Watch for and prevent retaliation against those who speak up
- Ensure a fair and respectful workplace

## Integrity in Action

**Q** I was raised in a culture where it is not common to report a concern about someone that is in a leadership position. I know my manager is violating policy, but I don’t want to be a snitch. What should I do?

**A** It’s important to say something about your concerns. Wesco respects and considers diverse cultural standards when looking into concerns, and we take appropriate steps to protect the identity of the person who is sharing the information, as well as the information that’s being shared.



## More to Explore

- [Business Conduct and Duty to Report Policy](#)
- [Escalation Guidelines](#)
- [Ethics and Compliance Office](#)

## Speak Up

All of us are required to adhere to this Code and to promptly report any violation of its provisions, other company policies or the law. Wesco takes all reports of possible misconduct seriously, and we will promptly investigate them. We will also take appropriate corrective action, which may include discipline, dismissal or other penalties. All of us are required to cooperate fully with any investigation into a report.

### Speak up in numerous ways

Wesco provides multiple resources for advice and help when you need it. Anyone who feels pressured to do anything that conflicts with our Code, believes a colleague is violating this Code, or finds themselves in a situation where the right course of action is not clear, can contact:

- The person's manager or any member of management with whom they feel comfortable
- The [ethics and compliance office](#)
- Regional compliance officers
- The [Business Integrity Line](#)
- A human resources manager
- Wesco's [legal department](#)
- [Internal audit](#)

There is no requirement to follow any particular chain of command to report a concern. Anyone who suspects their report has not been addressed may submit a report to others on this list.

Managers are expected to report suspected violations of law or the Code to the Wesco ethics and compliance office, regional compliance officers, human resources or the Business Integrity Line.

### Speak up free from retaliation

We do not tolerate any form of harassment or retaliation against anyone who in good faith reports or discloses violations of our Code, policies or the law or who cooperates with an investigation.

If you feel you, or someone else, has been the target of retaliation, you should immediately contact one of the resources listed in this Code. Anyone who retaliates against someone who speaks up or participates in an internal investigation will be subject to discipline, up to and including termination. For more information, including how to recognize and report retaliation, see Wesco's Anti-Retaliation Policy.

### Speak up anonymously

Anyone can submit an anonymous report, unless prohibited by local law, by contacting the Wesco Business Integrity Line. Calls and reports are handled 24 hours a day, seven days a week, by an independent third-party provider with translation services available. The reporter's identity will not be provided to anyone at Wesco unless the person reporting chooses to disclose their identity.

## How to Contact the Business Integrity Line

### Online:

<https://wescodist.ethicspoint.com>

### Telephone (toll-free):

U.S. and Canada at 1 866.873.2376

### List of numbers outside U.S. at:

<https://wescodist.ethicspoint.com>

### Mobile App:



## The Business Integrity Line

When anyone contacts the Business Integrity Line by telephone, a trained specialist will guide them through a series of questions necessary to complete the report. Calls to the Business Integrity Line are not recorded. If a report is submitted online, the person reporting will be asked to provide information on a web-based form. Both methods allow anonymity unless prohibited by local law. The reporter will also receive a 10-digit Report Key and will be asked to create a unique password that allows them to follow up on a report by phone or online.

In certain countries, local law may permit only certain types of reports, such as those involving bribery or matters that relate to financial, accounting or auditing violations, to be submitted through the Business Integrity Line, and may require them to be handled locally. If a reported matter is one that should be handled locally, the Business Integrity Line specialists will direct the reporter back to local management or human resources.

### Investigation Process

All reports are referred to the ethics and compliance office for initial assessment, investigation and resolution. The ethics and compliance office assesses every report to determine whether they allege illegal activities, violations of the Code of Business Conduct or policies, or other unethical conduct.

Each report is assigned to a qualified investigator who is responsible for investigating the matter as thoroughly and confidentially as possible. Reports concerning theft or misuse of company assets are assigned to investigators with expertise in such matters. Employment relations allegations, such as those involving harassment or discrimination, are investigated by experienced human resources employees.

During the investigation process, if the reporter provides their name with the initial report, the investigator may follow up by interviewing the reporter, along with others.

Information regarding reports and investigations will be shared with those who need to know it in order to ensure a thorough investigation or determine the best steps for discipline and remediation. When appropriate and consistent with privacy considerations, or when required by law, the person who reported the matter will be informed of an investigation's outcome and conclusions.

### After the Investigation

If an investigation determines there has been a violation of the Code or company policies, management and human resources will determine and carry out disciplinary action in accordance with Wesco policies and applicable law. Other remedial changes may be implemented, such as changes to business practices to prevent future violations.

On at least a quarterly basis, Wesco's Chief Ethics and Compliance Officer informs the Executive Compliance Committee, consisting of Wesco's Chief Executive Officer, Chief Financial Officer, Chief Human Resources Officer, General Counsel and Vice President of Internal Audit, of reports received and investigations conducted under the guidance of the ethics and compliance office. The Chief Ethics and Compliance Officer also provides investigation reports to the Audit Committee of Wesco's Board of Directors during its regular meetings.

The Board of Directors, as a whole or through one of its committees, may, in its discretion, also retain third party advisors to advise or investigate reports.

### Integrity in Action

**Q** I suspect – but am not certain – that someone is violating our Code. Should I keep my concerns to myself until I know something concrete?

**A** No. If you suspect a violation, speak up. It's better to raise a potential problem than to wait and risk harm to others or to the company. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out you were mistaken.

**Q** What if the concern I raise is about my manager – couldn't I lose my job?

**A** The best place to raise your concerns would typically be with your manager, but if it's your manager's behavior that concerns you, calling your human resources business partner or the Business Integrity Line are good alternative options. Regardless of who is involved, you should report your concerns promptly. It's your responsibility to do so, and it's critical that we hear about any activity that may be in violation of our Code.

### More to Explore

- [Business Conduct and Duty to Report Policy](#)
- [Business Integrity Line](#)
- [Anti-Retaliation Policy](#)

### Ask questions and raise concerns

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# Integrity in Our Workplace

We are committed to the safety, health and well-being of our employees, business partners and neighbors. We believe valuing every individual and appreciating the differences that make us unique is essential for building a successful business and strong communities where we operate. We do not tolerate the oppression or dishonor of any person, and we uphold human rights and dignity in our workplaces and supply chain.

## Discrimination

We provide a workplace where employees can reach their full potential and contribute to our overall success. We are deeply committed to the fair and equitable treatment of our employees and applicants for employment. We treat each person fairly, courteously, respectfully and with dignity. Our workplaces have an atmosphere of open communication and mutual respect, where we value each unique individual.

We comply with applicable employment laws and regulations where we operate and will not tolerate unlawful discrimination. Matters relating to recruiting, hiring, training, compensation, benefits, promotion, transfer, termination, working conditions and other aspects of employment and employee relations will be free of discrimination. We judge applicants and employees by their unique qualifications and skills. If we see or experience any form of discrimination, we report it. We do not tolerate retaliation against anyone making a report in good faith.

### Integrity in Action

**Q** I believe my manager is discriminating against me and I don't feel comfortable talking about the matter with them. What other resources are available to discuss this concern?

**A** If you do not feel comfortable talking to your manager, you should contact human resources, internal audit, the ethics and compliance office or a regional compliance officer. You can also anonymously raise a concern or question by calling the Wesco Business Integrity Line.

## Harassment and Bullying

We are committed to having a workplace that promotes the well-being and productivity of our employees and does not tolerate harassment in the workplace. We do not allow conduct that creates an intimidating, hostile or offensive working environment. We speak up when someone's conduct in the workplace (including a supplier's or customer's conduct) or at a company event makes us, or those around us, uncomfortable. If we experience or observe workplace harassment, we report it. Wesco prohibits retaliation against anyone who makes a report in good faith or who cooperates with an investigation.

### Integrity in Action

**Q** Can I raise a concern about harassment of a coworker even if it's a customer who is doing the harassing?

**A** Yes. We do not tolerate harassment, regardless of whether it comes from a manager, employee, customer, supplier or other business partner.

**Q** My coworker sometimes tells me jokes that I find offensive. What should I do?

**A** You should tell your coworker that you believe such jokes are inappropriate for the workplace. You can also discuss the situation with your manager or human resources.

### More to Explore

- Equal Opportunity Employer and Affirmative Action Policy
- Nondiscrimination Policy
- Nonharassment Policy
- Anti-Retaliation Policy

## Inclusion and Diversity

At Wesco, people are our greatest asset. We strive to create an environment where each member of our team is valued for their unique experiences and contributions. Inclusion and diversity are the foundations of our high-performing culture and we are committed to fostering an inclusive and diverse workplace that recognizes and values our differences.

We respect and appreciate differences in age, ethnicity, Indigenous origin or heritage, gender, physical attributes, beliefs, language, sexual orientation, education, nationality, social background, culture and other personal characteristics.

We know that making the most of the wealth of ideas, talents, skills, backgrounds, and perspectives all around us helps us do more and be more—together.

Our commitment to inclusion and diversity extends to our global supplier network. We support numerous initiatives and organizations that work to advance business opportunities for minority and women-owned business enterprises. We are dedicated to promoting and fostering an inclusive and diverse supplier network that will:

- Contribute to innovation and make better decisions through exposure to broader perspectives and ideas
- Promote engagement of small and diverse business enterprises in our distribution business
- Contribute to economic growth and expansion in the communities we serve

### More to Explore

- Inclusion and Diversity [intranet site \(Compass\)](#)

### A Closer Look: Fostering an Inclusive and Diverse Workplace

- Set an example of respecting differences among colleagues
- Demonstrate that all viewpoints matter, and everyone has an opportunity to contribute
- Let employees know that their contributions make a difference, and recognize their achievements
- Be objective – don't let decisions be influenced by personal feelings, unconscious biases or personal preferences

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## Safe and Healthy Work Environment

We provide safe and healthy work environments where we operate. We comply with all applicable health and safety laws and regulations, and we insist on working safely and responsibly. Every one of us is responsible for following Wesco's health and safety policies and procedures and for promptly reporting accidents, injuries or potential safety hazards.

We provide drug-free workplaces for all our employees. We encourage anyone with a drug- or alcohol-related problem to ask for help from Wesco's Employee Assistance Program or other qualified professionals. Wesco reserves the right to request drug testing whenever there is a safety concern and to terminate the employment of anyone who refuses.

We do not tolerate violence or threatening behavior, and we prohibit weapons on Wesco premises. We each have an obligation to report threats of violence or intimidation. Wesco will take appropriate disciplinary action against an employee who violates its policy of maintaining non-threatening work environments, up to and including termination. Any questions or concerns about workplace safety should be directed to Wesco's safety team.

### More to Explore

- Environmental, Health, Safety and Sustainability [intranet site \(Compass\)](#)
- Environmental, Health, Safety and Sustainability Statement
- Workplace Violence and Workplace Conduct Policy

# Integrity in How We Do Business

**We conduct business fairly and honestly. Our relationships with our suppliers, customers and other business partners are fair, positive and productive and based on mutual trust and respect. Building these relationships is an ongoing process and requires a commitment to high standards of ethical business conduct. In our interactions with these third parties, we demonstrate honesty and a commitment to our values.**

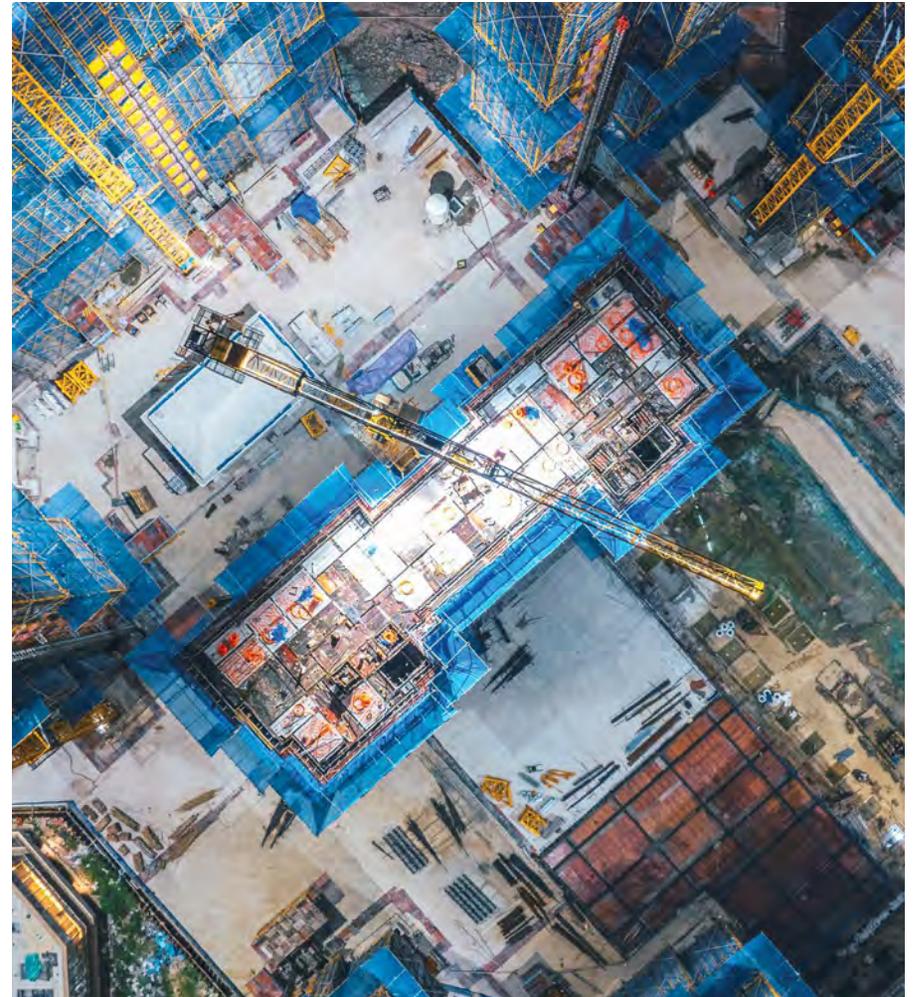
## Anti-Money Laundering

Money laundering is any process by which individuals or groups attempt to hide funds they have obtained illegally, or make them appear legitimate, by passing the funds through lawful financial or commercial transactions. We comply with all laws that prohibit money laundering, and we avoid transactions that may give the appearance of participating in such activities. We follow procedures designed to detect and prevent payment irregularities, and we promptly report suspicious activity.

### A Closer Look: “Red Flag” Requests

Contact the ethics and compliance office or a regional compliance officer if requested to:

- Make payments in currencies other than those that are typical or to which we previously agreed
- Make or receive payments in cash rather than by check or electronic funds transfer
- Make or receive payments to or from someone who is not a party to the transaction, or
- Make or receive overpayments



## Bribery and Corruption

We have a zero-tolerance policy against giving, soliciting, offering or accepting bribes or engaging in other corrupt business practices. We never authorize, offer, promise, give, request or accept a bribe, kickback or other unethical offer or payment in the course of doing business. Even in locations where such practices may be commonplace or culturally acceptable, we operate with integrity. We do not tolerate or condone participation in bribery or corruption.

We do not attempt, directly or indirectly, to improperly influence the decisions or actions of public officials, whether with bribes, by promising gifts, charitable or political donations, loans or future employment, personal favors, or by other unlawful inducement. We do not do anything indirectly that we are prohibited from doing directly.

Necessary steps are taken to ensure business partners who may deal with public officials on our behalf do not offer, promise or authorize any form of prohibited payments or inducements.

### Know your terms: What is a bribe?

A bribe is an offer or promise to pay, or to authorize payment of money or anything of value, directly or indirectly with the intent to gain an improper advantage or improperly influence a decision. Bribes can come in many forms, including cash, favors, gifts, entertainment, travel expenses, meals, charitable or political contributions, personal favors, offers to hire a government official's relative, or even discounts that are not available to others.

### A Closer Look: Public Officials

Who is a public official? This is a broad term that includes an employee, officer, official of, or consultant to:

- A government or its departments, agencies or divisions, whether at the national, state, regional, provincial or local level
- Institutions owned or controlled by a government, such as universities, hospitals, utilities, airlines or shipping companies
- Indigenous groups with sovereign status, such as tribes or nations within the U.S., Canada or other countries
- Political candidates and political party officials at any level of government, and anyone working for them
- International organizations, such as the United Nations or the European Union, and their agencies and other related bodies
- Members of royal or other ruling families

### Integrity in Action

- Q** I want to hire a consultant who will help us get operating permits in a foreign country. The consultant is requiring a large sum of money up front, and they refuse to sign any paperwork. What should I do?
- A** We must take active steps to ensure the consultant will not use our payments to bribe a government official. Contact the ethics and compliance office or a regional compliance officer for advice in advance.
- Q** A customer asked me to give their sister-in-law a job in exchange for placing an order. I declined the request, and we received the order anyway. Do I still need to tell anyone about this?
- A** Yes, it's always a good idea to let your manager know when something like this happens, to avoid further problems with the customer.

### More to Explore

- [Antibribery and Anticorruption Policy](#)
- [Doing Business with Government Entities Policy](#)
- [Gifts and Business Entertainment Policy](#)
- [Business Partner Anticorruption Policy](#)
- [Business Partner Selection Guidelines](#)

### Ask questions and raise concerns

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## Fair Competition

We believe in free and open competition. Our goal is to outperform our competitors fairly and honestly, and we do not tolerate conduct that unlawfully diminishes competition in the marketplace.

**We compete vigorously, and we will not enter into anticompetitive agreements such as:**

- Price fixing – making an agreement with a competitor to raise, lower or stabilize prices or other competitive terms
- Bid rigging – coordinating bidding activity with competitors
- Group boycotts – agreeing with a competitor to not do business with targeted individuals or businesses
- Dividing markets or allocating customers – dividing customers, sales territories or markets among competitors
- “No-poach” hiring – mutual agreement among employers, even in different industries, to not recruit or hire each other’s employees

Because an agreement can be inferred from a simple discussion with a competitor about competitively sensitive information, we do not discuss or exchange information with competitors about matters such as pricing, costs, margins, terms or conditions of sale or purchase, market segments, clients or bidding or marketing strategies.

### A Closer Look: Competitively Sensitive Information

Competitively sensitive information includes information such as:

- Pricing and profitability, including discounts, surcharges, rebates and margins
- Sales, including volume and value
- Costs of production or services
- Customers
- Strategic and marketing plans
- Criteria for supplier selection and sales territories

**Some agreements with suppliers or customers may adversely impact competition and therefore require prior approval by the legal department, such as:**

- Setting prices at which customers may resell the products we sell to them
- Suppliers setting prices at which Wesco may sell the products we buy from them
- Exclusive dealing or “requirements” contracts
- Reciprocal dealing – that is, requiring a customer to buy from Wesco before we will purchase from them
- Tying, which requires a customer to buy a product from Wesco as a precondition of buying a second product from us
- Selling products below our cost

### Lawfully gathering competitive information

Obtaining market intelligence is a normal business practice, but we will not use illegal or unethical means to obtain information about our competitors, their prices, products, services, or bidding strategies or decisions. We respect the nonpublic confidential information of other companies, just as we expect them to respect ours. We use public or other permitted sources and do not gather, or ask someone else to gather, information using any illegal or illicit activity. We follow the steps in the Collecting Competitive Information Guidelines. We promptly report any information improperly offered or obtained to the legal department.

#### More to Explore

- [Competition Law Policy](#)
- [Information Sharing Guidelines](#)
- [Trade Association Guidelines](#)
- [Collecting Competitive Information Guidelines](#)

## Fair Competition (Continued)

### Integrity in Action

**Q** I'll be attending an industry trade group meeting next month. One of the topics on the agenda is a discussion of supply chain disruptions, such as higher fuel costs and tariffs. Am I OK to participate?

**A** Trade shows and other industry meetings where competitors are in attendance require extra caution. Direct discussions of pricing or other competitively sensitive information must be avoided. The same rule applies to discussions around fuel costs, labor costs, transportation costs or any other input cost that may impact pricing. The legal department can work with you to make sure you carry out your activities with this trade group in a way that complies with the Code.

**Q** I have a new sales rep on my team that came to Wesco from a competitor. They mentioned to me that they have some old product pricing files from their previous employer and asked me if I wanted to see them. Can I review them since they are probably no longer current prices?

**A** No, you should not review them. You should treat price lists, even old ones, from competitors as confidential information of that competitor. As such, do not ask for or accept such information from a former employee of that competitor. You should tell your new employee of Wesco's policy and instruct them to destroy the information or to contact the legal department for assistance.

## Forced Labor and Human Trafficking

We are committed to upholding and protecting fundamental human rights, and we believe in treating all human beings with dignity and respect in compliance with the United Nation's Universal Declaration of Human Rights, along with the labor and human rights principles set out in the United Nations Global Compact and the laws and regulations of the countries in which we conduct business.

As stated in our Global Human Rights Policy Statement, we prohibit the use of forced or otherwise illegal labor and human trafficking. We do not use child or forced labor in our own operations, and do not condone the exploitation, physical punishment, abuse, trafficking or involuntary servitude of children or others throughout our supply chain. We also recognize lawful employee rights of free association and collective bargaining. We comply with applicable employment laws where we conduct business.

We seek to do business with suppliers and other business partners who demonstrate high standards of ethical business conduct and comply with local law. We take steps to make those third parties we do business with aware of the standards we apply to ourselves and expect from them. Our Supplier Code of Conduct plainly describes our expectations of our suppliers and other third-party business partners. We train our employees on the policies, procedures and behavior standards that determine how we do business. We periodically evaluate and address human rights issues in our business operations and the communities in which we conduct business. These standards apply regardless of local customs.

### More to Explore

- [Wesco Global Human Rights Policy Statement](#)
- [Supplier Code of Conduct](#)

### Ask questions and raise concerns

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## Gifts, Entertainment and Business Courtesies

Giving and accepting gifts, entertainment or other business courtesies can help strengthen our business relationships with our customers, suppliers and other business partners, if it's done properly. However, we do not give or accept gifts, entertainment or business courtesies if doing so might improperly pressure, or appear to pressure, the recipient to return the favor or feel indebted to the giver.

We can provide gifts or entertainment when doing so supports a legitimate business purpose and is reasonable and appropriate under the circumstances. We do not inappropriately solicit, or request gifts, favors or entertainment from suppliers, customers or business partners. We decline gifts or entertainment if accepting them would create the appearance of a conflict of interest. We never accept or provide gifts of cash.

When providing gifts, entertainment or business courtesies, we consider not only what Wesco policies permit, but also what is appropriate for the situation. We do not provide or receive lavish or extravagant items that may create the appearance of impropriety. If we are unsure whether a gift or event we want to host or to attend to is excessive or too extravagant, we will discuss the matter with our manager to make sure there is a legitimate business reason to host or attend the event.

It may be illegal to offer anything – even a modest meal or a promotional item – to a public official or government employee or contractor. Accordingly, we have even stricter rules when it comes to these recipients. All gifts, favors, entertainment, travel or accommodations provided to government officials, employees or contractors on government projects, regardless of value, must be approved in advance by the ethics and compliance office or a regional compliance officer as well as the relevant Wesco vice president.

# Gifts, Entertainment and Business Courtesies

## (Continued)

### Know Your Terms: Business Courtesies

Gifts, hospitality, gratuities, entertainment, travel-related expenses, loans, cash, prizes or other favors are all considered “business courtesies.”

### Stop and think

What if...

- A procurement employee is offered an all-expenses-paid weekend at a local resort by a supplier seeking to do business with Wesco?
- You are renovating your home and a Wesco supplier offers to provide building materials for free or below cost.

### Stop and ask yourself:

“Will accepting this gift influence or appear to influence my decision-making concerning this vendor? Could it embarrass the company if the situation is made public?” If so, don’t accept the gift. If in doubt about whether it’s okay to accept the gift, talk to your manager first.

### A Closer Look: Gifts and Entertainment

We give and accept only those gifts and entertainment that are

- Reasonable in its purpose and value
- Infrequent
- Not in the form of cash or cash equivalents
- In good taste, appropriate to the situation and not likely to embarrass Wesco
- Given openly and transparently
- Properly and accurately recorded
- Allowed by other Wesco policies and applicable law
- Given for the proper purpose of strengthening business relationships or demonstrating products or services

### Integrity in Action

**Q** What should I do if I receive a gift that violates Wesco policy?

**A** Return the gift and politely explain to the giver that our company policy prohibits you from accepting it. If the gift is something perishable, like flowers or a food basket, where return is not really an option, place it in a break room where it can be shared with everyone. If you are concerned that you might offend the giver by returning the gift, report it to the ethics and compliance office or a regional compliance officer so we may consider how to handle the situation.

**Q** After getting my manager’s approval, I offered to take a customer to a baseball game. But something has come up, and now I can’t attend the game. Can I just give the tickets to the customer?

**A** Even if the value of the tickets is reasonable, the event doesn’t offer an opportunity to enhance Wesco’s relationship with the vendor or their company if you don’t attend. If you can’t attend, ask one of your co-workers to attend in your place.

### More to Explore

- [Antibribery and Anticorruption Policy](#)
- [Doing Business with Government Entities Policy](#)
- [Gifts and Business Entertainment Policy](#)

### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)

## Interacting with Business Partners

We work with thousands of business partners, including suppliers, consultants, custom brokers, freight forwarders, contractors and other agents and representatives, around the world. We choose the right partners and make decisions objectively, based on factors such as quality, service, price, availability, reliability and integrity. We hold our business partners to high standards and expect them to operate ethically, in compliance with applicable laws and in a way that's consistent with our values.

We expect our business partners to maintain a culture of equality, diversity and inclusion, with a workplace that is free of harassment, unlawful discrimination and retaliation. We will not do business with a party that engages in child labor, forced labor, prison labor or human trafficking. We will also not do business with a party that is on a government created prohibited party list, or engages in bribery, corruption or other form of unethical business practices.

We do not enter into relationships with business partners until we have vetted them according to the Wesco Business Partner Selection Guidelines. Our business partners also agree to adhere to our Supplier Code of Conduct, Business Partner Anticorruption Policy and related policies, and applicable law.

If we believe a business partner or anyone acting on our behalf may be making improper payments or engaging in any form of unethical business practices, we will promptly report it to a regional compliance officer or the ethics and compliance office. We have a zero tolerance for unethical business practices and will not continue working with a party that engages in illegal or improper activity, or who repeatedly fails to meet our policies or ethical expectations.

### A Closer Look: Business Partner “Red Flags”

Most business partners are reputable, but when “red flags” such as the ones below are present, additional vetting of the business partner may be required:

- The business partner works in countries with a reputation for corruption
- Work for us will involve direct or indirect interaction with government officials, such as Customs officers or government procurement officials
- The business partner cannot substantiate their capability to do the work for us or refuses to answer our due diligence questions
- The business partner requests that payments be made to a bank located in a foreign country unrelated to the transaction

### Integrity in Action

**Q** Someone told me confidentially that an overseas supplier for one of our owned brand products is under investigation for employing children under the age of 14. The supplier hasn't told me any of this. Can I ignore these rumors?

**A** No. You should start by asking the supplier for information. If you are in any doubt, contact the supply chain organization, ethics and compliance office or a regional compliance officer so that they may ask our outside independent social audit company to verify the facts around the supplier's employment practices, working conditions and other issues, and take appropriate action depending on the outcome.

### More to Explore

- [Business Partner Anticorruption Policy](#)
- [Business Partner Selection Guidelines](#)
- [Supplier Code of Conduct](#)

## International Trade

As a global company, Wesco imports and exports products around the world. We understand there are multiple laws that restrict the trade of certain products and with certain sanctioned or otherwise restricted countries, persons and entities. We comply with all applicable export and import laws. We will not participate in any trade activity that violates these laws, and we will not ask a third party to do so on our behalf. To ensure the integrity of our supply chain, we will communicate our trade compliance policies to others who conduct business on our behalf. If there is a conflict between Wesco's policies and local trade laws, we consult the trade compliance department or legal department for guidance.

We know certain products may be subject to special trade controls and require appropriate authorization prior to exporting. We understand that trade restrictions and sanctions may restrict us from doing business with certain countries, entities and persons, and we take steps to properly screen parties against applicable restricted party lists. We also follow export control laws that limit the exchange of certain technical information, including exchanges by email or web access. We comply with applicable laws and make sure we have the required licenses or other government authorizations needed to import, export or re-export goods, services or technology.

We also comply with U.S. anti-boycott laws that prohibit us from participating in or cooperating with any foreign boycott or other restrictive trade practices that are not approved or sanctioned by the U.S. government.

### A Closer Look: Recognizing Boycotts

Language requesting us to participate in a boycott may not be readily apparent. Look for any contract, bid, purchase order, questionnaire or letter of credit that:

- Contains the word boycott or blacklist
- Prohibits the import or export of goods from or to certain countries
- Requires us to not ship goods via ports of particular countries

### Integrity in Action

**Q** What should I do if I suspect a customer is shipping products bought from Wesco to a country that is sanctioned or embargoed under applicable export laws?

**A** Shipping product to sanctioned or embargoed countries, even by a third party, may be unlawful. The rules that govern these shipments are very complex, and determining whether the shipment is lawful requires a careful review of the facts by the trade compliance department or the legal department.

**Q** I work at one of Wesco's non-U.S. based facilities, and I have been asked to purchase cable from a supplier that appears on the U.S. government's Specially Designated Nationals list. Since the facility where I work is outside the U.S. and I am not a U.S. national, is it okay for me to purchase this product from the supplier? If not, can I have an independent third-party source this item on our behalf?

**A** No. Our International Trade Policy makes it clear that Wesco employees, no matter where they are located, must comply with applicable trade sanctions laws and regulations, including any restrictions on entities and persons. This includes authorizing a third party to make this purchase on our behalf. You should consult the trade compliance department or the legal department for advice.

### More to Explore

- [International Trade Policy](#)
- [Trade Compliance Department](#)
- [Export Compliance and Procedures Manual](#)
- [Export Compliance Summary Quick Guides](#)

### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)

## Political Activities and Contributions

Wesco does not make corporate contributions of money or other things of value to any candidate for political office or political party. Wesco does respect the rights of its employees to participate in the political process and encourages them to participate in their choice of political activities at their own expense. However, employees must be careful to make clear that those activities do not represent Wesco when they participate in the political process.

Employees cannot use Wesco resources, property, time or funds for their own political activities, nor may they seek reimbursement to support political parties or candidates. If an employee makes a personal political contribution, the employee will not work on a government opportunity where that political contribution may create a conflict of interest, create the appearance of conflict of interest or violate “pay-to-play” rules. If an employee plans on running for or accepting a public office, the employee must first notify their manager in advance to discuss whether the official duties might affect the employee’s work, so as to minimize any adverse job impact and avoid a conflict of interest.

### A Closer Look: Rules and Restrictions

“Pay-to-play” rules in the U.S. may restrict directors, officers and employees working with public sector customers from making personal political contributions to a state or local candidate, officeholder or political action committee. Contact the government contracts group of the Wesco legal department for additional guidance.



### Integrity in Action

- Q** My manager has asked me to donate money to a particular candidate. They assure me I’m not obligated to contribute, but I feel pressured to comply. How should I handle this?
- A** Employees may not pressure other employees to support a political party or candidate. If you aren’t comfortable speaking with your manager or another manager about this, contact human resources or the ethics and compliance office.
- Q** I am running as a candidate for political office in the city where I live. I would like to mention in my campaign literature the fact that I work for Wesco. Am I allowed to do this?
- A** No. This would not be appropriate since it could be seen as Wesco implicitly supporting your candidacy.

## Product Quality and Integrity

Consistent with our core value of “Winning with Customers and Suppliers,” Wesco provides a portfolio of products, technologies and services that provide value to our customers. We comply with internal quality control processes and follow product and customer specifications. We follow applicable laws and regulations relating to the manufacture, design, sourcing, testing, packaging, storing, handling, labeling and shipping of products. We follow guidelines designed to ensure only authentic products obtained through authorized suppliers are sold and delivered to our customers. We will not knowingly purchase or sell counterfeit products to customers. We direct questions about the authenticity or authorized status of products to the Wesco [category management department](#).

### Integrity in Action

**Q** We have received a report from a supplier stating that manufacturing defects may have occurred in a recent shipment of electrical equipment. The products have already been shipped to our customer but we have not received any reports from them regarding defects causing performance or safety problems in the products. Do we have an obligation to recall the entire production run?

**A** We respond promptly to any concern about possible product safety. You should discuss the issue with supplier relations immediately.

### More to Explore

- [Authorized Product and Anticounterfeiting Policy](#)
- [Supplier Code of Conduct](#)

### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)

## Working with the Government

We comply with all laws and regulations that apply to government contracting, procurement, and interactions with government officials and employees when supplying products or services, either directly to a government agency or indirectly through a government contractor or subcontractor.

We are honest, accurate and forthright in our dealings with government officials, agencies, contractors and subcontractors, complying with applicable laws, regulations and Wesco policies. We follow the requirements in government contracts.

We carefully follow Wesco policies and guidelines on providing gifts, lodging, meals, entertainment or anything else of value to government employees. We do not discuss future employment opportunities with current government employees without first consulting the Wesco legal department, the ethics and compliance office or a regional compliance officer.

We avoid potential organizational conflicts of interest that might occur, such as when Wesco's work under one government contract provides us with non-public information that gives us an unfair competitive advantage on another contract or when our work on one government contract may impair our ability to give impartial advice on another government contract.

### A Closer Look: Minority and Women-Owned Businesses

Many federal, state and local government agencies in the U.S. have diversity initiatives aimed at fostering the growth and development of properly qualified small and disadvantaged business enterprises "MWDBEs" (Minority, Women, Disadvantaged Business Enterprises). Wesco supports these initiatives and is careful to do so in compliance with federal, state and local laws and regulations concerning MWDBE participation on government-funded projects and contracts ("Public Contracts"). In particular, Wesco is committed to the legitimate participation of properly certified MWDBEs who can and will perform a commercially useful function on each of the Public Contracts in which they participate.

### Integrity in Action

- Q** Are there special rules I need to follow if I want to host a lunch for government employees with whom I am working on a project?
- A** Don't offer anything until you confirm that it is appropriate. To get help determining what is appropriate, contact the government contracts group of the Wesco legal department, the ethics and compliance office or a regional compliance officer.
- Q** One of my friends is retiring from their employment with the government and would be an excellent addition to my new project team. Can I let them know about this opportunity?
- A** Contact human resources or the Wesco legal department before you begin any employment-related discussion with a current or former government employee.

### More to Explore

- [Antibribery and Anticorruption Policy](#)
- [Doing Business with Government Entities Policy](#)
- [Gifts and Business Entertainment Policy](#)
- [Guidelines for Direct Federal Orders](#)

# Integrity on Behalf of Our Shareholders

We create and sustain value for our shareholders by behaving with integrity and in the best interest of Wesco and its stakeholders. We protect Wesco's assets and confidential information, maintain accurate business records, ensure timely and accurate financial reporting, avoid conflicts of interest and communicate through proper channels.

## Business Records

### Complete and accurate business records

Our shareholders rely on us to keep complete, accurate and reliable business records. We observe stringent standards in keeping financial and other records and accounts. Our books reflect the components of each transaction with honest, accurate and clear presentation of the facts.

We do not falsify or improperly conceal information. We know that our business records, including our emails and voicemails, could be subject to public disclosure. We do our best to ensure our communications are clear, accurate and respectful.

We are each responsible for doing our part to ensure Wesco's books and records accurately reflect the transactions and events they account for and include supporting documentation. We do not make incorrect or false statements in our books, expense reports, time sheets, quality or safety records or other business records. We do not alter, conceal or destroy documents or records that are subject to an investigation, official proceeding or a request from the legal department (e.g., a Legal Hold).



### A Closer Look: Business Records

Business records include purchase orders, contracts, manufacturing records, expense reports, invoices, government-required financial disclosures, other financial statements and regulatory reports to government entities—even routine things like emails and time sheets.

### A Closer Look: Legal Holds

A Legal Hold, also referred to as a Litigation Hold, is the process by which Wesco is required to preserve potentially relevant information when litigation is pending or reasonably anticipated.

### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)

## Financial reporting

Our shareholders rely on us to provide timely and accurate information about our business and financial results. To ensure the information we disclose in reports filed with the U.S. Securities and Exchange Commission or similarly made publicly available is full, fair, accurate and timely, we adhere to stringent standards of financial and accounting record keeping and maintain and follow our internal system of controls and procedures.

### Integrity in Action

**Q** I don't work in finance or accounting. Is "financial integrity" my responsibility?

**A** Yes. Accuracy in record keeping isn't the job of one team or one department. It's a responsibility we all share. From expense reports and benefits enrollment forms to sales invoices—our everyday transactions must be accurate, complete and properly recorded.

**Q** I work in sales at Wesco and just closed a big deal with a new client. Business was a little slow last quarter and I did not meet my sales goal. I already have a few deals lined up for the next month, so meeting my sales goal this quarter shouldn't be a problem. Is it acceptable to backdate the sales from my new client to last quarter so I can meet that sales goal?

**A** Not at all. Our financial records need to accurately reflect every transaction. Regardless of your sales goals, the orders from your new client must be recorded on the day they were shipped. No matter what work we do for Wesco, we all have a responsibility to make sure the company's records are complete and accurate.

## Records management

We manage business records in accordance with applicable retention requirements. Various laws and good business practices require Wesco to keep certain business records, including electronic records, for various periods of time. In addition, we will not discard relevant records when litigation, subpoenas, audits or investigations are pending or otherwise require their retention. On the other hand, storing business records longer than necessary incurs needless costs and potential risks for Wesco, and it also prevents us from efficiently retrieving and accessing relevant records. We comply with Wesco's Records Management Policy and related guidance, including our Records Retention Schedule, which explains how long we should keep business records and when to dispose of them.

### Integrity in Action

**Q** My work is done electronically with no actual paperwork. Does the Records Management Policy apply to me?

**A** Yes. This policy applies to all records, including electronic records.

**Q** I was asked by my manager to clean out the files of team members that have left Wesco. I have no idea if any of the documents need to be saved or if I can just get rid of them. What should I do?

**A** The first thing you should do is to check Wesco's Records Management Policy and Records Retention Schedule to see if the items are within the categories or records governed by those documents. If there is no ongoing lawsuit, Legal Hold, investigation, audit or examination to which the documents may relate, the destruction of documents and emails in the ordinary course of business can be done in accordance with our Records Management Policy and Records Retention Schedule.

### More to Explore

- [Records Management Policy](#)
- [Records Retention Schedule](#)

## Communications and Social Media

To ensure communications about our business are accurate and presented in a consistent manner, whether to the media, our shareholders or the general public, we do not speak on behalf of Wesco without specific authorization. If we receive an inquiry from a shareholder, investor, market analyst or other member of the financial community, we refer the inquiry to our investor relations team or Chief Financial Officer. If any media representative or other third party asks for an interview or requests information or opinions about a Wesco-related matter, even if the matter is not confidential, we refer the request to our corporate communications team who have access to relevant information and are trained to respond appropriately.

### When we use social media, we are careful to:

- Clearly state that any opinions we express are our own and do not reflect those of Wesco
- Avoid disclosing confidential business information
- Not post anything discriminatory, threatening or that would constitute intimidation, harassment or bullying

These requirements apply even to Wesco-related comments we make on our own personal blog or social media pages or on third-party websites.

### Requests and referrals: who handles what

- Refer all requests for financial information to the [investor relations team](#)
- Refer all media inquiries and public requests for information to the [corporate communications department](#)
- Refer all inquiries from government and regulatory agencies to the [legal department](#)



### Integrity in Action

**Q** What should I do if I see that a co-worker is trashing Wesco as a place to work? Can I respond to their posts and challenge their comments?

**A** No, you should not comment unless you are specifically authorized to speak on behalf of Wesco. You should refer the matter to human resources, the ethics and compliance office or a regional compliance officer.

### More to Explore

- [External Communications Policy](#)
- [Wesco Social Media Policy](#)

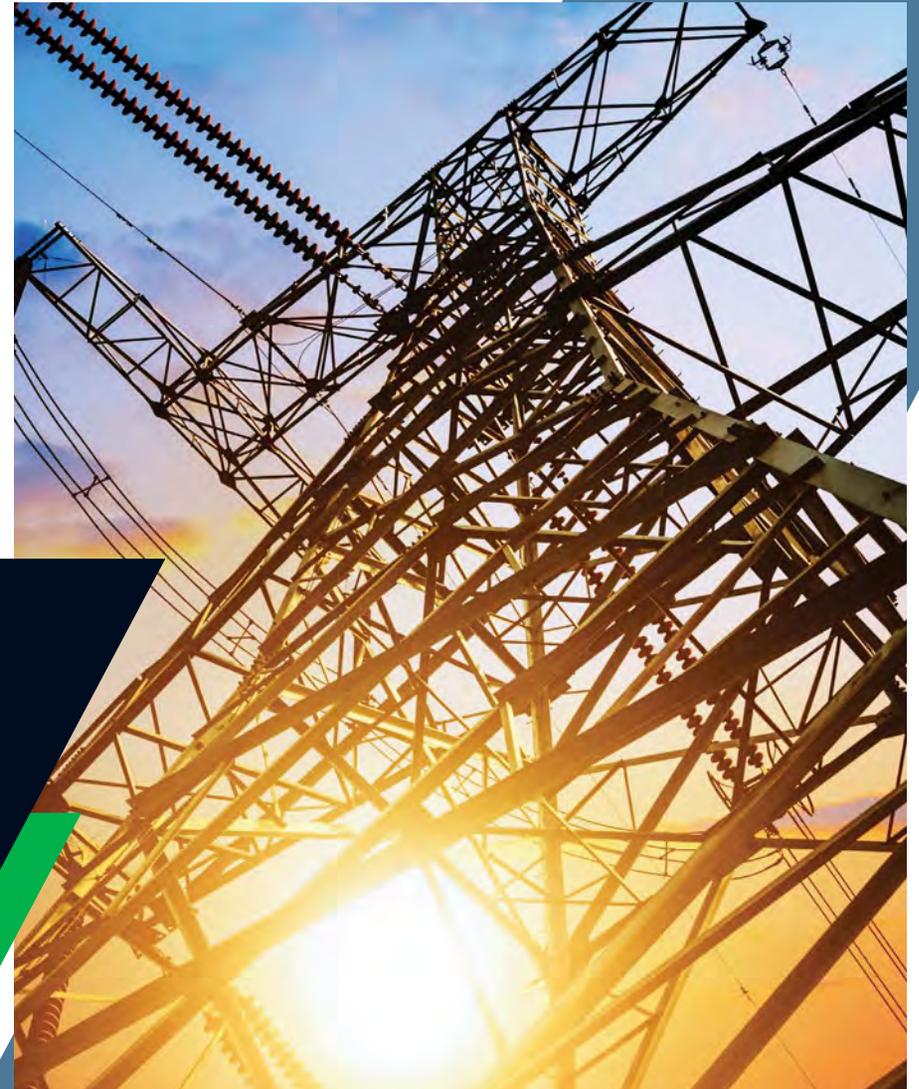
### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)

## Conflicts of Interest

We act in the best interest of Wesco and our shareholders, and we avoid situations that may tempt us to act contrary to those interests. In fact, we avoid even the appearance of a conflict of interest. We do not use our position, contacts or knowledge about Wesco for personal gain, nor do we compete with Wesco or take an opportunity that opens up to Wesco for our own personal gain. We do not allow personal or family relations or outside investments to influence our business decisions.

Directors, officers and employees may be required to disclose investments in or connections with companies with which Wesco does business, or other potential conflicts of interest to the ethics and compliance office, a regional compliance officer or legal department. We avoid outside business activities that could interfere with our ability to perform our responsibilities.



### A Closer Look: Recognizing Conflicts of Interest

Avoid problems later on. If you think you may have a conflict of interest but you're not sure, ask yourself: Could this situation, behavior or relationship...

- Be inconsistent with Wesco's values and policies
- Improperly influence me to act in favor of my family, friends or personal interests
- Give the appearance of not putting Wesco's interest first
- Give the appearance that I am using the company's assets or resources for my own or family's or friend's benefit or personal gain
- Influence — or appear to influence — my ability to make unbiased and objective business decisions
- Cause damage to the company's reputation
- Interfere with my job performance

## Conflicts of Interest (Continued)

### Circumstances where conflicts can arise include:

- Second jobs with a Wesco supplier, customer, competitor or contractor
- Family members working for a Wesco supplier, customer, competitor or contractor
- Significant investments or ownership interest in a Wesco supplier, customer, competitor or contractor
- Use of Wesco resources for second jobs, hobbies or outside interests
- Direct supervisory relationships between a manager and a spouse, domestic partner, partner of a civil union, family member or someone with whom the manager has a close personal relationship

Prior to engaging in any activity or decision that might create a conflict of interest, we fully disclose the facts to a manager, the ethics and compliance office or a regional compliance officer. Potential conflicts must be disclosed via Wesco's Business Integrity Line and clicking on the [Conflicts of Interest Disclosure Form](#) link.

### Related party transactions

Certain types of transactions in which an executive officer or Board member or a member of their immediate family is engaged in may require prior approval under Wesco's Related Party Transaction Policy.

### Integrity in Action

**Q** I need to get a part-time job in addition to my Wesco job. Is this a problem?

**A** It is generally not a problem if your other job is not with a company that could be a Wesco competitor or otherwise present a conflict of interest, and as long as the other job does not affect your ability to do your Wesco job.

**Q** My spouse is an employee at a company that does business with Wesco. I have recently been promoted, and in my new job, I will be in contact with my spouse's company from time to time. What should I do?

**A** This could create a conflict or the appearance of a conflict of interest. You should contact your manager, the ethics and compliance office or a regional compliance officer for guidance. It is important that potential conflicts be disclosed so we can anticipate and avoid issues. Additionally, you and your spouse should take steps to ensure you protect confidential or proprietary information of both companies.

### More to Explore

- [Antibribery and Anticorruption Compliance Policy](#)
- [Conflicts of Interest Policy](#)
- [Related Party Transaction Policy](#)
- [Applicable Wesco Employee Handbook](#)

### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)



## Data and Confidential Information

Data and confidential information we create or receive from others while doing our jobs are valuable Wesco assets. We create, acquire and use confidential information about Wesco, our business partners, customers, colleagues and others. Use of our systems and other technology resources is intended primarily for business purposes.

We take appropriate precautions to protect confidential or personal information. Our responsibility to protect Wesco's confidential information from unauthorized use or disclosure continues after we are no longer employed by Wesco.

## Confidential Information

Confidential Information includes any non-public information that belongs to Wesco, our customers or business partners, or other third parties. We take care to appropriately protect such information and ensure that it is used solely for the business purpose for which it was intended. We disclose such information only to those who have a legitimate business need for it and who are authorized to receive it, or when disclosing it is required by law. We do not use confidential information for our personal use.

We do not accept confidential information about a competitor from a former employee of that competitor. If we happen to inadvertently come into possession of a competitor's information from one of their former employees, we will contact the ethics and compliance office or a regional compliance officer for further guidance.

We take necessary steps to protect confidential information, including where appropriate, signing agreements before disclosing information to third parties. We avoid publicly discussing or displaying Wesco confidential information. We are cautious when talking with others or using cell phones, laptops and wireless devices, so third parties cannot overhear or see confidential information. We take care not to inadvertently disclose confidential information to family, to friends or through social media.

### A Closer Look: Confidential Information

Confidential information includes information such as:

- Business or strategic objectives, plans and outlooks
- Pricing and cost data
- Mergers, acquisitions and divestiture information
- Proprietary business processes and procedures
- Intellectual property and trade secrets
- Non-public financial data
- Communications regarding legal matters
- Other nonpublic customer or third-party information
- Customer, supplier, business partner and employee lists
- Internal organizational charts
- Contracts and agreements



### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)

## Personal Information

We respect the privacy of our customers, colleagues and business partners, and we handle their personal information with proper care. We collect and use personal information only for legitimate business reasons. We will only access personal information we need to do our jobs, and we will not share it or make it available to others who are not authorized to know about it. We comply with our internal policies, contractual obligations and applicable laws dealing with the collection, processing and protection of personal information. We require third parties that process personal information on our behalf to protect it.

### A Closer Look: Personal Information

Personal information is any information that could be used to identify someone, either directly or indirectly, such as:

- Home addresses
- Banking or credit card information
- Biometric information
- Government identification numbers
- Payroll information
- Medical information
- Employment records
- Job applications



## Protecting Information

We maintain a comprehensive information security program that includes organizational, technical and physical safeguards to protect confidential information, personal data and Wesco's information technology systems and assets. We follow Wesco policies and procedures to protect our networks, computers, programs and data from attack, damage or unauthorized use, access or disclosure. We do not access any system or database containing confidential or personal information unless we have a legitimate business need and are authorized to do so. If we suspect an unauthorized disclosure, sharing or transfer of confidential or personal information, we promptly report it to the [Wesco information security team](#).

We understand that Wesco may at any time monitor, as allowed by local law, the use and content of the company's information systems, including company-provided telephones, computers and other electronic devices.

### A Closer Look: Data Minimization

Just because we can or want to collect personal information doesn't mean we should. The practice of data minimization means the collection, use and retention of personal information should be limited to what is directly relevant and necessary to accomplish a specific and legitimate business purpose. The data should not be retained longer than necessary to fulfill those purposes.

## Integrity in Action

**Q** I have to leave my laptop with IT for some upgrades, but I have an important work project I need to complete over the weekend. Can I take files containing customer data home with me on a thumb drive or email the files to my personal email so that I can finish working on them at home?

**A** Neither option is allowed if the data is considered confidential or sensitive data. All Wesco confidential data must be protected from inadvertent disclosure through the use of encrypted storage and transmission. Use of a thumb drive or emailing to your personal email account so you can work on the files on your personal computer cannot guarantee the level of protection our policies require. You should ask IT if they have a loaner laptop you can use over the weekend and connect to the Wesco network via our VPN.

**Q** I received an email from "ondrive@microsoft.com" asking me to enter information to update my OneDrive. After I did so, I realized the sender's email address had a typo. Nothing has happened though, should I do anything about it?

**A** You should immediately notify our IT Cybersecurity Department. Even if our systems are not affected, data may have been compromised.

### More to Explore

- [IT/Digital Communications intranet site \(Compass\)](#)
- [Information Security Policies and Procedures](#)
- [Data Classification Standard](#)
- [Confidentiality Policy](#)

### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)

## Protecting Wesco Assets

We are entrusted with Wesco's assets in order to do our jobs, and we safeguard them from loss, damage, theft, waste and improper use. Wesco's assets include physical property, such as facilities, supplies, equipment, machinery, tools, spare parts, raw materials, finished products, scrap materials, vehicles, company funds, computer hardware and software, computer networks and information systems. Company assets also include intangible assets such as trade secrets, confidential information and data.

We use Wesco's assets for proper business purposes and as Wesco allows. Personal use of Wesco information technology resources, such as a company laptop or email account, is permitted as long as such use is limited and does not have a negative impact on productivity or system functions.

We protect company assets and act with fiscal responsibility. We report when Wesco assets are stolen, damaged, unsafe or in need of repair. Our obligation to protect Wesco funds is particularly important for those who have spending authority, approve travel or entertainment expenses, or manage budgets and accounts. To safeguard Wesco's assets, we will:

- Follow the requirements of the Wesco Levels of Authority (LOA) Policy when approving transactions
- Ensure funds are properly used for their established purpose
- Accurately record all expenditures
- Verify that expenses submitted for reimbursement are business related, properly documented and in compliance with Wesco policies and guidelines
- Make sure company-owned assets are physically protected, including mobile devices and computers

### A Closer Look: Misusing Company Resources

Examples of misusing Wesco resources include:

- Taking products or supplies for personal use
- Using a corporate credit card for personal purchases
- Using company vehicles for unauthorized personal purposes
- Reselling scrap or waste product for personal gain



### Integrity in Action

**Q** I have a co-worker that is purchasing electronics for their own use with their company credit card. Is this appropriate since the employee makes a personal payment to their company credit card account?

**A** No. Wesco's corporate card policy prohibits the intentional misuse of a corporate card by making personal purchases.

### More to Explore

- Physical Security Policy
- Travel and Business Expense Policy
- Levels of Authority (LOA) Policy
- Acceptable Use Policy

## Insider Trading

In the course of our work, we may become aware of important information about Wesco or other companies that is not available to the general public. We do not trade Wesco's securities or other companies' securities while in possession of material non-public information, nor do we disclose material non-public information to other persons, such as relatives or friends, who may trade securities as a result of knowing it. Material non-public information is any information, not generally known or available to the general public, that a reasonable investor would consider important in deciding whether to buy, sell or hold a security.

We understand either positive or negative information about Wesco or any other company may be material. We do not engage in short-term speculation in Wesco securities or any transaction where we could profit if the value of Wesco's securities declines. If we are in doubt about a particular transaction, we consult with our legal department.

### Integrity in Action

**Q** Through my job, I am aware that sales have been very strong for one of our largest customers this quarter. May I advise my brother to buy the stock of the customer before their earnings for the quarter are publicly announced?

**A** No. Buying or selling stock in Wesco or any company based on any material, non-public information – or “tipping” by passing such information along to others, triggering them to subsequently trade themselves – not only violates our Code of Business Conduct, but is also illegal and can result in severe penalties, including sanctions, fines and civil and criminal penalizations.

### More to Explore

- Insider Trading Policy

### A Closer Look: Material, Non-Public Information

Examples of material non-public information include:

- Earnings, financial results or projections
- Potential acquisitions, mergers, divestitures or sales of significant assets
- Management changes
- Stock splits or dividend policy changes
- Significant new products or services
- The departure or hiring of key employees
- The gain or loss of a substantial customer or supplier
- Actual or threatened significant lawsuits or government investigations

### Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](http://Wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)



# Integrity Within Our Communities

We take our responsibility seriously to serve the communities in which we do business and preserve the environment in which we all live. We seek opportunities to improve our communities and care for the natural resources we depend on.

## Contributing to Our Communities

We conduct business in more than 50 countries and operate around 800 facilities and offices. These facilities are in communities that are home to our employees and their families, as well as to our customers and other stakeholders. We want these communities to be inclusive, sustainable, and prosperous places to live and work.

We are encouraged to become active in our communities and to support causes that improve our communities. Individually, and through Wesco Cares, we support local charitable, civic, educational, and cultural causes in the forms of contributions, volunteer time and other assistance.

### More to Explore

- Wesco Giving Guidelines

## Sustainability

Wesco is committed to reducing our use of natural resources and working with our customers and vendors to help them do the same. Our corporate sustainability program supports continuous improvement of our business processes, helping us control and reduce our environmental impact in the areas of energy use, waste, materials and natural resources and transportation.

In support of our commitment, we comply with all applicable environmental laws and regulations. We also work with our customers and suppliers to help them attain their own sustainability goals through the products and services we provide. Each employee has a role to play in successfully carrying out our commitment to the environment. We train our employees on a variety of Environmental, Social and Governance (ESG) topics.

### More to Explore

- Environmental, Health, Safety and Sustainability **intranet site (Compass)**
- Environmental, Health, Safety and Sustainability Statement
- Wesco Sustainability Report

# Contacts

If you have a concern you would like to discuss, or merely want advice, start with your manager. Managers are in the best position to listen and decide what to do next. If that is not possible, or if you feel uncomfortable speaking with your manager, please contact the ethics and compliance office, a regional compliance officer, human resources, internal audit or legal departments. You may also bring up any concern or ask a question by contacting the Wesco Business Integrity Line using any of the methods below.

## Ethics and Compliance Office

**E-Mail:** [ethics@wesco.com](mailto:ethics@wesco.com)

**Phone:** U.S. access code +1 224.521.8604

**Mail:** Chief Ethics and Compliance Officer  
Wesco International  
225 West Station Square Drive  
Suite 700  
Pittsburgh, Pennsylvania 15219

## Business Integrity Line

Online	<a href="https://wescodist.ethicspoint.com">https://wescodist.ethicspoint.com</a>
U.S. and Canada	866.873.2376 (toll-free)
Outside the U.S.	Toll-free numbers listed by country at <a href="https://wescodist.ethicspoint.com">https://wescodist.ethicspoint.com</a>

## Regional Compliance Officers

Asia Pacific	<a href="mailto:ethics.APAC@wesco.com">ethics.APAC@wesco.com</a>
Latin America	<a href="mailto:ethics.CALA@wesco.com">ethics.CALA@wesco.com</a>
Europe, Middle East and Africa	<a href="mailto:ethics.EMEA@wesco.com">ethics.EMEA@wesco.com</a>

## Audit Committee of the Wesco Board of Directors

The Audit Committee of the Board of Directors may be contacted through the Business Integrity Line. In the U.S. and Canada, reports to the Audit Committee via the Business Integrity Line may be reached by calling 1.866.873.2376. For web-based reporting options and instructions on calling the Business Integrity Line from outside the U.S. and Canada, go to: <https://wescodist.ethicspoint.com>.

## Others Listed in the Code

Corporate Communications	<a href="mailto:Corporate_Communications@wesco.com">Corporate_Communications@wesco.com</a>
Information Security	<a href="mailto:ITSecurity@wesco.com">ITSecurity@wesco.com</a>
Internal Audit	<a href="mailto:Internal_Audit@wesco.com">Internal_Audit@wesco.com</a>
Investor Relations	<a href="mailto:investorrelations@wescodist.com">investorrelations@wescodist.com</a>
Legal	<a href="mailto:legaldepartment@wescodist.com">legaldepartment@wescodist.com</a>
Safety	<a href="mailto:safety@wesco.com">safety@wesco.com</a>
Trade Compliance	<a href="mailto:tradecompliance@wescodist.com">tradecompliance@wescodist.com</a>

## Ask questions and raise concerns

Web: [Wescodist.ethicspoint.com](https://wescodist.ethicspoint.com) | Email: [ethics@wesco.com](mailto:ethics@wesco.com)





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