

SLAVERY AND HUMAN TRAFFICKING STATEMENT

REXEL UK LIMITED

FINANCIAL YEAR ENDING 31 DECEMBER 2023



REXEL

a world of energy

INTRODUCTION

At Rexel UK, we are committed to eliminating all forms of slavery and we will not tolerate any of these practices in our business or in our supply chain. At the date of publication, we have not received any notification of modern slavery occurring either within our business or supply chains. This Statement is an update to the Slavery and Human Trafficking Statement published for the Financial Year ending 2022.

This statement outlines some of the controls, policies and practices existing during Financial Year 2023 to prevent modern slavery occurring both within our organisation and our supply chain.

This statement has been published in accordance with the Modern Slavery Act 2015 and sets out the steps taken by Rexel UK Limited, and its relevant subsidiaries, to prevent modern slavery in our business and supply chain for the financial year ending 31 December 2023.

OUR BUSINESS

We are a market leader in the professional distribution of products and services for the energy world. We are an electrical wholesaler with c. 280 branches and c. 2,300 employees spread across the UK, supporting professionals in a range of sectors including, residential, non-residential and industrial markets. As a business, the safety of our employees is of paramount importance and to that end one of our goals is to be the best and safest place to work.

Rexel UK Limited trades as Denmans Electrical and Rexel.

All trading is supported and overseen by Rexel UK Finance, Commercial, HR and Legal departments.

ORGANISATION'S STRUCTURE

We are part of the Rexel Group and our ultimate parent company is Rexel SA which has its head office in Paris, France. Rexel SA is listed on the Eurolist market of the Euronext Paris stock exchange.

The Rexel Group employs more than 27,000 employees across 19 countries and has a network of some 1,900+ branches worldwide. Our 2023 annual group turnover was 18.7 billion.

REXEL GROUP

27,000

employees

1,900

branches worldwide

19

countries

€18.7 billion

2023 annual group turnover

OUR COMMITMENT

As a Group, we are committed to ensuring that there is no modern slavery or human trafficking in our business or in any part of our supply chain. This commitment is enshrined by the Rexel Group's signature of the United Nations, Global Compact in December 2011.

The Global Compact initiative brings together companies, governments, professional organisations, and non-governmental organisations and is designed to offer a more social, ecological and ethical notion of globalisation. By signing the Global Compact, the Rexel Group is giving a commitment to comply with and promote the ten key principles of the Global Compact in the areas of human rights, labour, environment and anti-corruption. We have made this commitment as we are keen to contribute to a more socially responsible global economy.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have several policies and procedures in place to support our anti-slavery commitment. Please see below for an outline of some of these key policies.

Rexel Group Ethics Guide

As a Group, we stand by the fundamental values that are set out in the Group Ethics Guide. These values embody our identity. Amongst other things, the Guide requires full compliance with the core conventions of the International Labour Organization relating to minimum wages, working hours, protection of the environment and health and safety.

Sustainable Supplier Charter

The Sustainable Supplier Charter formalises Rexel's expectations towards its suppliers, service providers, contractors and subcontractors in the areas of ethics, human rights, protection of employees' rights, respect of the environment and compliance with applicable laws.

Each Supplier working with Rexel is expected to commit to the principles set out in the Charter; it is the cornerstone of a lasting commercial relationship and will strengthen the relationships of trust established between Rexel and its suppliers.

In the event of non-compliance with the provisions of the Charter, the commercial relationship with the Supplier may be reviewed and corrective measures may be taken.

Minimum Factory Conditions

Our Minimum Factory Conditions are based on the International Standard SA8000 and outline a minimum set of workers conditions with which we expect our suppliers, and their factories to comply. We reserve the right to terminate any relationship with suppliers who are found to be non-compliant with these conditions.

Third Party Due Diligence

According to Rexel's Third Party Due Diligence Policy, any third party (being a customer, supplier or intermediary) must be reviewed against the rules of this policy before any trade is permitted. For example, Rexel will not permit any transaction with a third party who buys, sells or operates from a Country which is ranked low on Transparency International's Corruption Perception Index without first undertaking further compliance and sanction checks which identify any recorded wrongful activity by the Third Party (including linked criminal convictions).

Whistleblowing

Our whistleblowing policy sets out the internal process to follow for employees to make a disclosure should they observe any misconduct including the mistreatment of our people. If any employee has any misgivings about Rexel's conduct, they are encouraged to speak with their Line Manager, Security and/or HR department. Suppliers are encouraged to speak with their main contact or his/her line manager in the first instance. If they are not comfortable in doing so, an employee or supplier can contact our whistleblowing hotline which is manned by an independent company, Safecall.

To encourage disclosures, the caller can retain their anonymity should they wish. Disclosures can be made by phone (0800 915 1571); email (rexel@safecall.co.uk); or online (www.safecall.co.uk/report). All reports to the hotline are taken seriously and are fully investigated.

During FY2023 we did not receive any disclosures via Safecall.

Additionally, our ultimate parent company, Rexel SA, have a whistleblowing system available to internal and external stakeholders at <https://www.rexel.com/en/ethical-alert/>. Amongst other things, any Human Rights concerns can be reported using this tool and any disclosure made in this way will be reported to and processed by the Rexel Global Ethics Committee.

You can read our external policies here:

- [Rexel Global Ethics Policy](#)
- [Minimum Factory Conditions](#)
- [Rexel Group Sustainability Supplier Charter](#)

ACCREDITATIONS

EcoVadis Gold Award

EcoVadis scorecards provide detailed insight into environmental, social and ethical risks across 200 purchasing categories and 160 countries. The Rexel Group has been independently assessed by EcoVadis and has been accredited with Gold Standard certification, scoring within the top 5% of companies assessed globally and the top 2% within our sector. Further information on EcoVadis is available [here](#).

Achilles UVDB & Achilles Building Confidence

Achilles Building Confidence is the construction standard providing certification to Safety Schemes. Rexel UK are subject to an annual evidence desktop and on-site based audit to verify information and assess areas of compliance within health and safety, environment and sustainability, quality, Corporate Social Responsibility, business continuity, ethics and more. Rexel UK has successfully passed the audits with a maximum score of 100%. Further information on Achilles is available [here](#).

Constructionline – Materials Supplier Premier Membership

Rexel UK are accredited to the Constructionline Materials Supplier Premier membership. They assess company's credentials for environmental management, quality management, equal opportunities, Modern Slavery Act adherence and anti-bribery and corruption policies. Further information on Constructionline is available [here](#).

Supply Chain Sustainability School – Gold Membership

The Supply Chain Sustainability School is a learning platform on sustainability, with the aim of upskilling those working within, or supplying to, the built environment sector. Rexel UK actively engages with the school to improve individual and organisational knowledge and expertise across the three pillars of sustainability, including topics such as modern slavery and responsible supply chain management. Rexel UK achieved Gold membership in 2023, which demonstrates our commitment to continual learning and improvement in supply chain sustainability.

PROCESSES FOR PREVENTING SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS

We are a UK employer subject to UK employment laws and have well developed practices and controls in place to prevent the risk of modern slavery occurring in our business. These practices are under constant review to ensure continuous improvement. The following is a brief summary of our internal processes and controls.

Permanent Employees

All recruitment for permanent and fixed-term employees is managed through a centralised recruitment function. All applicants are tracked through our online recruitment portal and any new appointment is validated by senior management and the independent Human Resources (HR) department.

All candidates are vetted by the Hiring Manager following guidance from our HR department before they are processed as an employee. HR will ensure that all employment contracts and Right to Work checks have been properly completed and that the candidate has been met in person to receive ID documents.

Additionally, all payee details are checked monthly by our Payroll department to identify any duplicate bank

accounts and, as part of the induction checklist, Line Managers are required to conduct a visual check that the bank details provided belong to the employee.

The onboarding process is now digitalised and as part of this workflow, the new employee is required to read and electronically agree to Rexel's Ethics Guide (see above).

Temporary Employees

We will occasionally use temporary labour in our operations (e.g. warehouse operatives and drivers).

Where temporary labour is used, to control any risk of modern slavery, (where possible) we channel temporary appointments through a handful of centrally approved agencies. The nominated agencies are all highly regarded with good reputations and have implemented robust recruitment processes to help ensure that there is no existence of modern slavery in any temporary/ agency appointments, e.g. through vetting of a candidate's identity, Right to Work documents, bank account and employment history.

The panel of Agencies is under continuous review.

There is also a centralised process for onboarding and paying indirect suppliers (see below). All recruitment of temporary labour is processed using this system which has reduced the number of suppliers of temporary agency staff and seen an increase to our approved recruitment partners.

During the onboarding process all new suppliers are approved by our Head of Recruitment for further governance.

Whistleblowing

Anybody within our business who has a suspicion of modern slavery is encouraged to speak to their Line Manager, Security and/or HR department. As an alternative, they can call our whistleblowing hotline (see above).

As a matter of policy, we will support any Whistleblower who raises a genuine concern, even if they turn out to be mistaken.

Awareness

We are actively working to increase awareness in our Business of the presence of modern slavery in the UK.

An e-learning training module is available to all Rexel UK employees via our online academy.

This is a mandatory module which all Rexel UK employees are required to complete. The purpose of this module is to make employees aware of the existence of modern slavery in the UK, to help them identify the signs that someone maybe a victim of modern slavery, and to advise them of what action should be taken in the event that they identify an individual at risk. As at the end of FY2023, our completion rate for this module was 97% which increased from the end of FY2022 thanks to various initiatives aimed at raising awareness of this training.

High impact posters have been issued to key locations that heavily rely on temporary labour. These are displayed prominently on staff noticeboards and encourage anybody with a suspicion of modern slavery to call the Modern Slavery Helpline.

OUR SUPPLY CHAINS

We purchase goods and services from predominately UK based suppliers. We have established strong and long-lasting relationships with a mix of global market leading manufacturers and local (UK) SMEs.

All suppliers of goods stocked for resale are managed centrally by our Commercial Department. From time to time, we are asked to procure goods outside of our profiled suppliers; there is a documented approval process for these instances with independent sign off by the applicable Regional Commercial Manager and the UK Commercial Manager. Suppliers of goods/services not for resale are increasingly becoming managed centrally by our Finance Department.

The number of strategic suppliers continues to decrease which has strengthened our relationships with our strategic partners and given us greater influence and transparency on their practices.

We do recognise that there is a risk of modern slavery occurring in our supply chain and we are continually working with our partners to implement further checks and balances to mitigate and reduce this risk even further.

SUPPLIER ADHERENCE TO OUR VALUES

We are committed to ensuring that we only partner with suppliers that respect Rexel UK's core values and those of the UN Global Compact. We have made significant improvements to our procurement processes to ensure we select and work with suppliers who meet these standards.

Supplier Sustainability Charter

In FY2021 we launched the Rexel Sustainable Supplier Charter and encouraged all of our strategic suppliers to sign this Charter to commit to the same ethical and moral values, standards and goals as Rexel UK.

We have continued to promote the signing of the Charter in 2023 with our key strategic suppliers. C.77% of our strategic suppliers had signed the Charter in 2023. It is now a mandatory requirement for all strategic suppliers to sign and commit to the principles in the Charter.

Direct Suppliers/Goods for Resale

During FY2021, we undertook an extensive review of our direct purchasing practices and processes. As a result of this, we implemented a new Standard Operating Procedure to ensure that all of Rexel UK's direct Suppliers and tender activities are managed consistently and fairly, according to best in class practices. The SOP now clearly sets out:

- the Procurement functions management of suppliers by supplier classification (e.g. number of review meetings, number of factory visits).
- the type and frequency of tenders per product classification;
- the documents, policies and/or accreditations that our suppliers are expected to have or hold per supplier classification.

The SOP also includes template tender documents which continue to put Rexel UK's core values at the essence of the selection criteria. Amongst other things, all tenderers must complete a due diligence questionnaire which includes details on the steps they have taken to eradicate any modern slavery in their own business and supply chain.

We have updated our standard purchasing agreements to directly include our Supplier Sustainability Charter and Minimum Factory Conditions rather than incorporated by reference. The purpose of this is to draw our Supplier's attention to the values and importance of these two documents.

Finally, we have created a framework for conducting social responsibility audits of our first and second tier supply base utilising support from the Rexel Group's global presence. As part of this process, the supplier completes a self-certification on their practices and policies using Rexel UK's proprietary audit questionnaire.

These responses are then validated at an on-site survey which is also used to assess the supplier's honesty and integrity. In 2022, we conducted two physical audits of our suppliers Chinese manufacturing facilities which did not reveal any issues of slavery.

SOLAR

During FY2022 we became aware of a report published by Sheffield Hallam University which identified the possibility of forced labour in the global solar supply chain. Specifically, the report highlighted that the polysilicon used in the manufacturing of some solar products has been associated with the exploitation of Uyghur and Kazakh minorities in Xinjiang, China.

Whilst Rexel UK have not received any direct notice that any of its supply chain is using forced or slave labour, both the Rexel Global and Rexel UK's Executive Management team remain extremely concerned about the contents of the report and have addressed it with senior members of our preferred manufacturers.

As a response to the report, Rexel UK have mandated enhanced due diligence on all suppliers of solar panels. All solar suppliers must now sign Rexel's Sustainable Supplier Charter (see above), complete an enhanced due diligence questionnaire and we undertake a compliance check against them prior to making any purchases.

In addition, members of the Global Rexel Purchasing Team visited a number of our suppliers in China. As part of this visit, they viewed the factory and working conditions and discussed Rexel's expectations. We recognise that this visit is not conclusive as to the presence of slave labour within the solar supply chain and we therefore plan to commission external CSR audit reports during FY2024 on our major suppliers.

EcoVadis

The Rexel Group use the EcoVadis Corporate Social Responsibility (CSR) monitoring platform to assess a selection of key suppliers. Details of the EcoVadis platform are set out above. Rexel uses the results of this assessment to benchmark and improve its suppliers CSR practices on an ongoing basis.

Since the beginning of the CSR evaluation process, more than 435 suppliers representing 80% of Rexel Group's direct purchases have received a request to assess their performance. 213 suppliers representing 54% of the Group's direct purchases have had an evaluation less than two years ago. 58 of Rexel UK's direct suppliers have responded with EcoVadis medals.

From discussions with the participating suppliers, we understand that larger companies have few problems in completing the assessment. However, for small and medium sized entities it can be onerous. We are therefore reviewing the process to see how we can get more smaller suppliers to participate.

Indirect Suppliers/Goods Not For Resale (GNFR)

The procurement of goods not for resale (indirect goods) is managed via a GNFR Portal which is overseen by the Finance department.

Each spend category is assigned an owner from the relevant business department who are ultimately accountable for the conduct of suppliers within their category. The GNFR portal controls the process of creating new supplier accounts and paying suppliers to ensure total transparency and greater rigour in the process.

Rexel have implemented a new process for creating new suppliers for non-trade spend on the GNFR Portal. The involvement of the category stakeholder is now compulsory before a new indirect supplier will be created on the GNFR Portal. Where the annual spend with a particular indirect supplier is projected to be above £20k, a quote will be required from at least two prospective suppliers and the approval from Rexel's Chief Financial Officer is required. Where the annual spend with a particular indirect supplier is projected to be above £100k, a full tender is required.

All new indirect suppliers (regardless of projected spend) will be required to complete a due diligence questionnaire, which includes details on the steps they have taken to eradicate any modern slavery in their own business and supply chain and sign a contract which will include provisions relating to the eradication of modern slavery. This activity helps ensure we partner with suppliers who respect Rexel UK's core values and who have a similar commitment to eradicating modern slavery.


Our tender process puts Rexel UK's core values at the essence of the criteria. The tender process is multi-staged to allow for greater and more objective scrutiny of any potential supplier. All suppliers must agree to abide by our Supplier Sustainability Charter and Minimum Factory Conditions.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business or supply chains, we intend to take the following steps to further combat slavery and human trafficking:

- Continue implementation of the new e-learning training module and maintain the high completion rate to ensure awareness of the risk of modern slavery in our Business
- Explore further steps to enhance our Distribution Centre employees' understanding of the indicators of modern slavery and when somebody may be suffering at the hands of an organised criminal gang
- Continually review the panel of approved recruitment agencies for temporary workers, including sample auditing to further test the strength of the governance controls
- Review and improve the controls around the approval and onboarding of new non-profiled suppliers.
- Continue to work with strategic suppliers to ensure agreement and adherence to Rexel's Sustainable Supplier Charter
- Further expand the regularity and scope of the social responsibility audits on our first and second-tier supply chain, with a focus on solar supply chain.

Signed:



Ciaran Foley, Chief Executive Officer
Rexel UK Limited
Date: 7 October 2024