

Modern Slavery Act Transparency Statement

(for financial year ended 31 December 2021)

Rubix Limited

Slavery and Human Trafficking

Rubix Limited and its subsidiaries detailed in its Annual Report and Financial Statements for the financial year ended 31 December 2021 (including, but not limited to, Rubix Group International Limited) (together, “**Rubix**”) does not condone and will not participate in any form of human exploitation, including child or forced labour, slavery and / or people trafficking. Rubix is aware of the provisions of the Modern Slavery Act 2015 (the “**Act**”) and this statement sets out the steps that Rubix takes to address the risk that slavery and human trafficking might be taking place in its supply chain or within Rubix’s business.

Our Business & Supply Chain

Rubix is the leading pan-European value-added distributor of high-quality industrial maintenance, repair and overhaul (MRO) products and services operating through 750+ locations across 22 countries. We have established ourselves as a multi-specialist omni-channel provider of products and services, with a commitment to excellence in distribution and technical expertise. With a turnover of €2.6 billion in 2021, we are Europe’s largest MRO distributor and with under 3% market share are a natural industry consolidator.

We serve approximately 200,000 customers across the manufacturing sector, leveraging our pan-European network and delivering 24/7/365 locally across Europe. Key local market brands within the Rubix group include Brammer, BT Brammer, Buck & Hickman, Giner, Julsa, Matrix, Minetti, Montalpina, Novotech, Orexad, Robod, Syresa, Schäfer, C. Plüss, Canellas Proteccio, Fluidmec, Lerbs, Motronic, Stop-Fluid, Magma, Solyro, Technidis Peter Campbell Sales, Desarrollos, Zitec, Matara, Knowlton & Newman, Deritend, KJN Aluminium Profile and WCT. Rubix is the authorised distributor of many of the world’s leading engineering component manufacturers and we offer over 2 million individual products to our customers.

We are committed to delivering sustainable long-term value for our customers, employees, investors and other stakeholders. As part of this commitment to sustainability, all our operations across the UK and Europe adhere strictly to all local regulations.

Our Policies

We are committed to ensuring that slavery and human trafficking does not take place in our supply chain or our own operations and we have rigorous management-approved policies and processes in place to help deliver our commitment. Many of Rubix's existing policies contain specific elements relating to slavery and human trafficking, including the following:

- The **Group Code of Conduct and Ethics**, applicable to all affiliates, sets out Rubix's expectation that all employees should behave in an ethical and law-abiding manner. This Code states: "Rubix is committed to meeting its responsibility to respect and promote human rights, and to avoiding any infringement of human rights or any adverse impact on, or abuses of such rights".
- Our **Dignity at Work Policy** sets out Rubix's ethos that each Rubix employee has a right to work in a safe and supportive environment. Rubix recognises and respects the legal and moral rights of all persons affected by its operations and is committed to providing a working environment free of harassment, discrimination or prejudice. It reaffirms our strong belief in the benefits of non-discrimination and equality of opportunity.
- Our **Whistleblowing Policy** commits to the highest standards of openness, probity and accountability. There is a whistle-blowing mechanism administered by a third party in place to enable employees to voice compliance-related concerns in a responsible and effective manner, helping to prevent and detect malpractice or wrongdoing. The effectiveness of this policy is further enhanced through a 24-hour, confidential, whistleblowing hotline, operated by an independent partner. All employees are encouraged to use this to report serious concerns regarding matters in the workplace.
- Our **recruitment standards** require pre-employment checks to be made in line with all applicable local legislation on all new employees, including candidates' eligibility to work.
- The Rubix **Supplier Code of Conduct** sets out our expectation that suppliers meet the high ethical standards that are consistent with Rubix's corporate beliefs and values and the majority of our core Group suppliers meet or exceed this expectation. We expect all our suppliers (and their subcontractors) to operate their businesses and conduct employee relations in an ethical manner and to meet the requirements stipulated by both international and regional laws and industry standards. As such, we expect our suppliers to have policies in place to prevent illegal or forced labour or child labour; and to comply with all local regulations governing maximum work hours, minimum wages and dismissal procedures.

Risk Assessment and Due Diligence

The risk of slavery and human trafficking within Rubix's organisation is considered to be substantially mitigated through the implementation of the above policies. In addition, Rubix seeks to identify and minimise the risk of slavery and human trafficking in its supply chain by endeavouring to select suppliers who adopt high ethical standards that are consistent with Rubix's corporate beliefs and values and seeks to build long standing relationships with these suppliers. These standards include respecting the rights of the individuals who are employed by them. The majority of Rubix's products are sourced from leading global manufacturers within Europe who adopt and monitor adherence with the high standards that we expect of them.

Training and Effectiveness

During 2021, we expanded the Rubix Academy across the group as a comprehensive digital learning platform to which a large and growing number of the Group's employees now have access. The platform contains both mandatory and discretionary learning modules in multiple languages.

Every year, Rubix carries out a group-wide employee survey to obtain feedback for management and to identify areas to focus on to increase employee engagement and learning. The 2021 survey highlighted another year of improvement in our Engagement Index which at 70% now stands above the European benchmark. This score highlights the success of the Group's focus on employee health and wellbeing during the disruptive COVID pandemic. High-frequency, high-visibility communications from the Group's senior management team helped to protect motivation and engagement. This was supported by excellent communications from line managers, especially where teams were working from home more than they had done before, and our colleagues felt strongly that they and their teams were supported and worked together effectively during this difficult time.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is subject to an annual review.

Approved on behalf of the Rubix Limited Board of Directors

23 June 2022

Signed: A handwritten signature in blue ink, appearing to read "Andrew Silverbeck", is written over a horizontal line.

Andrew Silverbeck, Director,

for and on behalf of Rubix Limited