MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Policy Applicable: All Staff (including office, warehouse, remote)
Policy Owner: HR Manager and Human Resources Department
Policy Number: PP135
Last Updated: September 2024
Policy Status: This policy is non contractual and may be updated or changed by the company at any time.

About this Policy

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out R&M's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending 31st December 2023.

As part of supply of electrical equipment and services, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

R&M Electrical Group Ltd is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

This statement covers the activities of R&M Electrical Group Ltd.

R&M are one of the largest independently owned cable and electrical suppliers in the UK. R&M supply electrical products and services both nationally and internationally to the Oil, Gas, Petrochemical, Industrial, Marine, Pharmaceutical and Commercial sectors.

The organisation currently operates in the following countries:

UK Distribution

R&M have a network of branches across England, Wales and Scotland with dedicated trade counters committed to distributing electrical products and services.UK stocking branches include Bristol, Neyland, Oxford, southampton, Swansea and Aberdeen in addition to a range of specialist divisions also based in southampton area.

International Distribution

Besides a number of specialist divisions and branches in the UK, R&M have overseas branches in Asia, Azerbaijan, Kazakhstan, Iraq and the Middle East.

R&M's global network of divisions and strategic partners allows R&M to distribute electrical products and ancillaries internationally.

High Risk Activities

We do not believe we have any activities within its own organisation that are considered to be at high risk of slavery or human trafficking.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Quality, Commercial and Human resource manager are responsible for managing and leading the development of new, and review of existing, policies and procedures across R&M Electrical Group.

- **Risk Assessments:** We state in our supply chain risk assessments that we will comply with all miscellaneous legislation, but will make specific reference to Modern Slavery Act in the future.

- **Investigations/due diligence:** R&M evaluates their suppliers using a continuous process based on the valuation of their general conduct. As part of R&M's due diligence process into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.

- **Training:** The company will provide training for those employees who interface with supply chain to raise awareness of modern slavery throughout the organisation and to better understand and respond to the slavery and human trafficking risks.

Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** the organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give raise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others can raise their concerns verbally or in writing, in accordance with our Whistleblowing policy.

- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier/Procurement Code of Conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the relationship.

- **Recruitment/Agency Workers Policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting from that agency.

- **Corporate Social Responsibility:** Operating in a responsible and sustainable manner is important to R&M Electrical Group Ltd. Whilst we run our business in line with the expectations of diverse global

stakeholders, we also see corporate responsibility as a discipline that helps us to manage risks and maximise on the opportunities presented to us in a changing world. We take our corporate responsibility seriously across the Group as an employer, investor and a consumer.

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

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- The identification, evaluation and approval of suppliers as per our "Supplier Evaluation" and "Supplier Qualification" processes.

Performance Indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring those employees who interface with supply chain to have completed training on modern slavery.
- Developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain.
- Reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires those employees who interface with supply chain within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged

on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- What steps the organisation should take if suppliers or contractors do not implement anti- slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-Rising Programme

As well as training staff, the organisation will be raising awareness of modern slavery issues by distributing flyers to staff/putting up posters across the organisation's premises, circulating a series of emails to staff and will make the Modern Slavery and Human Trafficking Statement available on the staff intranet.

The above will explain to staff:

- The basic principles of the Modern Slavery Act 2015.
- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available, for example through the Modern Slavery Helpline.

Board Member Approval

This statement has been approved by the organisation's board of Directors who will review and update it annually.

Name: William Crook

Title: Group Managing Director

Signature: 

Date: September 2024