



REXEL

a world of energy

SLAVERY AND HUMAN TRAFFICKING STATEMENT

REXEL UK LIMITED

FINANCIAL YEAR ENDING 31 DECEMBER 2016

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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 are not aware of any circumstances of modern slavery occurring either within our business or by any supplier with whom we work.

We have implemented policies and procedures to continue to prevent modern slavery. This statement outlines some of these policies and practices.

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 2016.

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 over 350 branches and 3,000+ employees spread across the UK, supporting professionals in a range of sectors including, residential, non-residential and industrial markets. Our goal is simple: to help our customers be their best in running their business by providing a broad range of sustainable and innovative products, services and solutions.

At the date of this statement, Rexel UK Limited trades as Denmans Electrical, Newey & Eyre, Parker Merchants, WF Senate, Wilts Electrical Wholesalers, Dunlop and Hamilton, Lerwick Engineering Supplies & Services, Ross Electrical, Sunbridge Control & Automation, Britsource and Rexel Energy Solutions.

All divisions are 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 who has its head office in Paris, France. Rexel SA is listed on the Euronext market of the Euronext Paris stock exchange.

REXEL GROUP

27,000

employees

2,000

branches worldwide

32

countries

€13.2 billion

2016 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 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 a number of policies and procedures in place to support our anti-slavery commitment. Some of these policies are outlined below.

Rexel Group Ethics Guide

The Rexel Group has established six fundamental values that embody our identity and has captured these values in our Group Ethics Guide. It requires compliance with the core conventions of the International Labour Organization relating to minimum wages, working hours, protection of the environment & health and safety.

Rexel UK Code of Business Conduct

To supplement the Ethics Guide, we have a UK Code of Business Conduct and we demand that all of our employees, suppliers and subcontractors comply with this Code. It contains the minimum standards of behaviour that we expect of our employees and suppliers and the consequences facing anybody failing to abide by these standards. The Code has been issued by the Chief Executive Officer of Rexel UK and its compliance is monitored by our Legal, Audit, HR and Commercial functions.

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.

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 or supplier has any misgivings about Rexel's conduct, they 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.

You can read our external policies here:

- [Rexel UK Code of Business Conduct](#)
- [Rexel Global Ethics Policy](#)
- [Minimum Factory Conditions](#)

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 employees is managed through a centralised function. Any new appointment is first validated by senior management and the independent HR function.

All candidates are vetted by our Human Resource Function, before they are processed as an employee. Further, 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.

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

Temporary Employees:

We will occasionally use temporary labour in our operations (e.g. warehouse operatives and drivers). To control any risk of modern slavery, (where possible) we channel temporary appointments through a single agency; a well-recognised global market leader in this field. The nominated agency has implemented robust recruitment processes to help ensure that there is no existence of modern slavery in any of our temporary/agency appointments, including thorough vetting of a candidates identify, Right to Work documents, bank account and employment history.

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.

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) SME's.

All suppliers of goods for resale are managed centrally by our commercial function.

We have dramatically reduced the number of suppliers we partner with over the last year. This will strengthen our supplier relationships and give us more influence over their practices.

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

SUPPLIER ADHERENCE TO OUR VALUES

In order to ensure that the core principles of the Rexel Group and UN Global Compact are reflected effectively by the behaviour of our suppliers, our Group has conducted on-site audits.

Additionally, our Group recently conducted a pilot project aimed at appreciating the Corporate Social Responsibility (CSR) performance of its suppliers through a shared assessment platform. The pilot project was conducted with EcoVadis, a global leader in supply chain CSR assessment. Following the success of that trial a full global roll commenced during the early part of 2016 which includes Rexel UK.

Further, we have adopted a Code of Conduct and a set of Minimum Factory Conditions reflecting the standards of behaviour we expect from our employees and suppliers alike (see above).

Selected suppliers have been asked to complete a due diligence questionnaire to better understand their risk areas and the steps they have taken to tackle modern slavery in their business and supply chains. A number of these suppliers will be audited against these policies and standards.

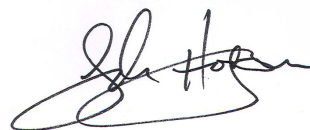
A Supplier Governance Committee sits once every quarter to discuss issues and challenges within our supply base including any human welfare concerns. This committee includes members of the Legal, Commercial, Health & Safety and Procurement teams and is chaired by the Legal Department.

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:

- An enhanced awareness campaign will be launched at selected higher risk locations within our business.
- Training will be provided to all relevant personnel.
- Additional measures will be put in place to channel all temporary recruits through our approved agency.
- Due diligence will be conducted on selected suppliers.
- Physical social responsibility audits will be arranged at selected suppliers.
- Greater governance will be implemented on suppliers of goods not for resale.

Signed:



John Hogan, Chief Executive Officer
Rexel UK Limited

Date: