

# REXEL CANADA MODERN SLAVERY POLICY



## OBJECTIVE

At Rexel, our global company purpose statement is *Electrifying solutions that make a sustainable future possible*. Through the products, solutions, expertise and services we provide, we strive to make the activity of our customers easier, more efficient and more sustainable. We strongly believe that caring about the people in our business, community, operations and supply chains is key to our purpose and a sustainable future. We also believe that sustainability includes operating our business responsibly and ethically. The objective of this policy (“Policy”) is to articulate Rexel Canada’s commitment to addressing modern slavery, including human trafficking and severe labour exploitation.

## SCOPE

This Policy applies to all Rexel Canada employees, contractors and suppliers, irrespective of the location of their operations. Suppliers must comply with this Policy, the Rexel Sustainable Supplier Charter and the Rexel Code of Ethics.

## WHAT IS MODERN SLAVERY?

Modern slavery is an umbrella term that is widely used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery can occur in various forms, including the following types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

## OUR MODERN SLAVERY COMMITMENT

At Rexel Canada, we respect fundamental human rights and are committed to conducting our activities fairly, honestly and with integrity, in accordance with applicable laws. We do not tolerate modern slavery in any part of our business or in the business of our suppliers. We recognise that modern slavery is a complex issue and that our activities and supply chain may be unintentionally linked to modern slavery practices.

Accordingly, we are committed to taking ongoing steps to monitor, identify, minimise and mitigate modern slavery risk in our supply chain, to protect potential victims of modern slavery and to contribute to the prevention of modern slavery risks in the future.

Rexel Canada has a Modern Slavery Working Group (consisting of senior leaders from our Supply Chain, Legal and HR teams) which is responsible for developing and implementing operational and procurement controls that mitigate modern slavery risk within the business. We will also prepare and file an annual Modern Slavery Report in accordance with *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (referred to as Canada’s “Modern Slavery Act”), which aims to provide insight into the risk of modern slavery in our operations and supply chain and the ongoing actions we are taking to address this risk

## OUR EXPECTATIONS

All Rexel employees are responsible for:

- Exercising good professional and ethical judgment when performing their duties.
- Avoiding engaging in any activity which might lead to a breach of this Policy.
- Participating in modern slavery training as required.
- Treating any concern about modern slavery with respect and appropriate levels of sensitivity.
- Reporting suspected or confirmed cases of modern slavery in any part of Rexel’s business or its supply chains as soon as possible.
- Where relevant, monitoring and supporting the ability of suppliers to comply with this Policy and the Rexel Sustainable Supplier Charter.

Rexel expects our employees to promptly raise any concerns where they are unsure about whether a particular act, the treatment of workers or their working conditions within any of our operations or supply chains constitutes any of the various forms of modern slavery with their manager or HR Business Partner. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.

Suppliers and Contractors are responsible for:

- Complying with this Policy and the Rexel Sustainable Supplier Charter.
- Not engaging in child labour or other forms of forced or compulsory labour, human trafficking, or debt bondage.
- Escalating and investigating any suspected case of modern slavery or breach of this Policy, ensuring that the rights and wellbeing of affected persons are protected.
- Making efforts to strengthen their modern slavery policies and mitigation actions in respect of their business and their supply chains.
- Reporting any case of suspected modern slavery to their Rexel Canada contact or where necessary by using a third-party independent service.

## **ENFORCEMENT OF THIS POLICY AND MODERN SLAVERY REMEDATION FRAMEWORK**

We expect and encourage employees, suppliers, and sub-contractors to report any concerns regarding modern slavery, including suspected cases or areas of concern.

Where Rexel Canada becomes aware of breaches of this Policy or has concerns about potential modern slavery issues in its operations or supply chains, we will take appropriate action in a timely manner and have regard to applicable laws, relevant industry practices and Canadian guidance when determining the appropriate remediation steps.

Rexel Canada has a modern slavery remediation framework which we apply on a case-by-case basis in determining how to respond to incidents of modern slavery in our operations and supply chains. Remediation steps may include working with our suppliers to prepare a corrective action plan and resolve the matter as soon as practicable, notifying regulators or Rexel potentially avoiding or exiting a business relationship.

Any Rexel employee who breaches their obligations under this Policy or engages in retaliation against any person who raises concerns about modern slavery risk, will face investigation and possible disciplinary action, which could include termination of employment.

## **REVIEW AND PUBLICATION OF THIS POLICY**

A copy of this Policy is available on Rexel Canada's website and on our internal intranet for Rexel Canada employees.

This Policy will be reviewed at least every two years to ensure it remains consistent with all relevant legislative requirements, as well as the changing nature of the business. This Policy may be amended, withdrawn, or replaced from time to time at Rexel's discretion.