

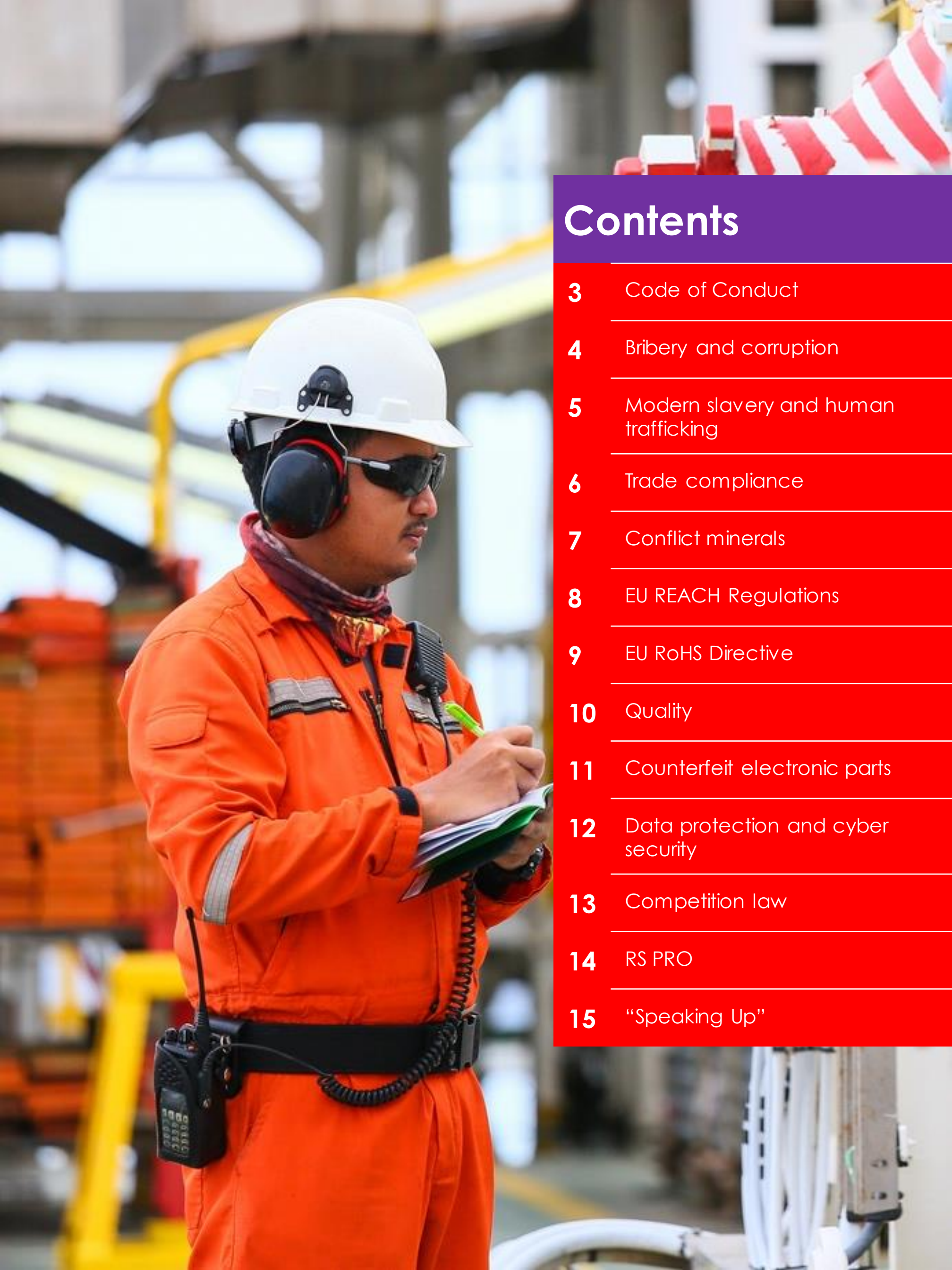


# **RS Group plc**

## **Compliance at RS Group: an overview**







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# Code of conduct

## The starting point for compliance at RS Group is our Code of Conduct.



Our Code of Conduct outlines our position on key governance areas and provides guidance to support our people and our partners in maintaining the highest standards of ethical and legal conduct. Doing the right thing for our people, shareholders, customers and suppliers is part of our culture and must underpin everything we do.

As a company that aspires to become first choice for its stakeholders by making amazing happen every day, it is critical that what we do and how we do it reflects the values that we as a company stand for. We embed our Code of Conduct through mandatory training and policy communications and it brings us together as one team, ensuring we are all informed to make the right decisions.



**You can view our code of conduct at:**

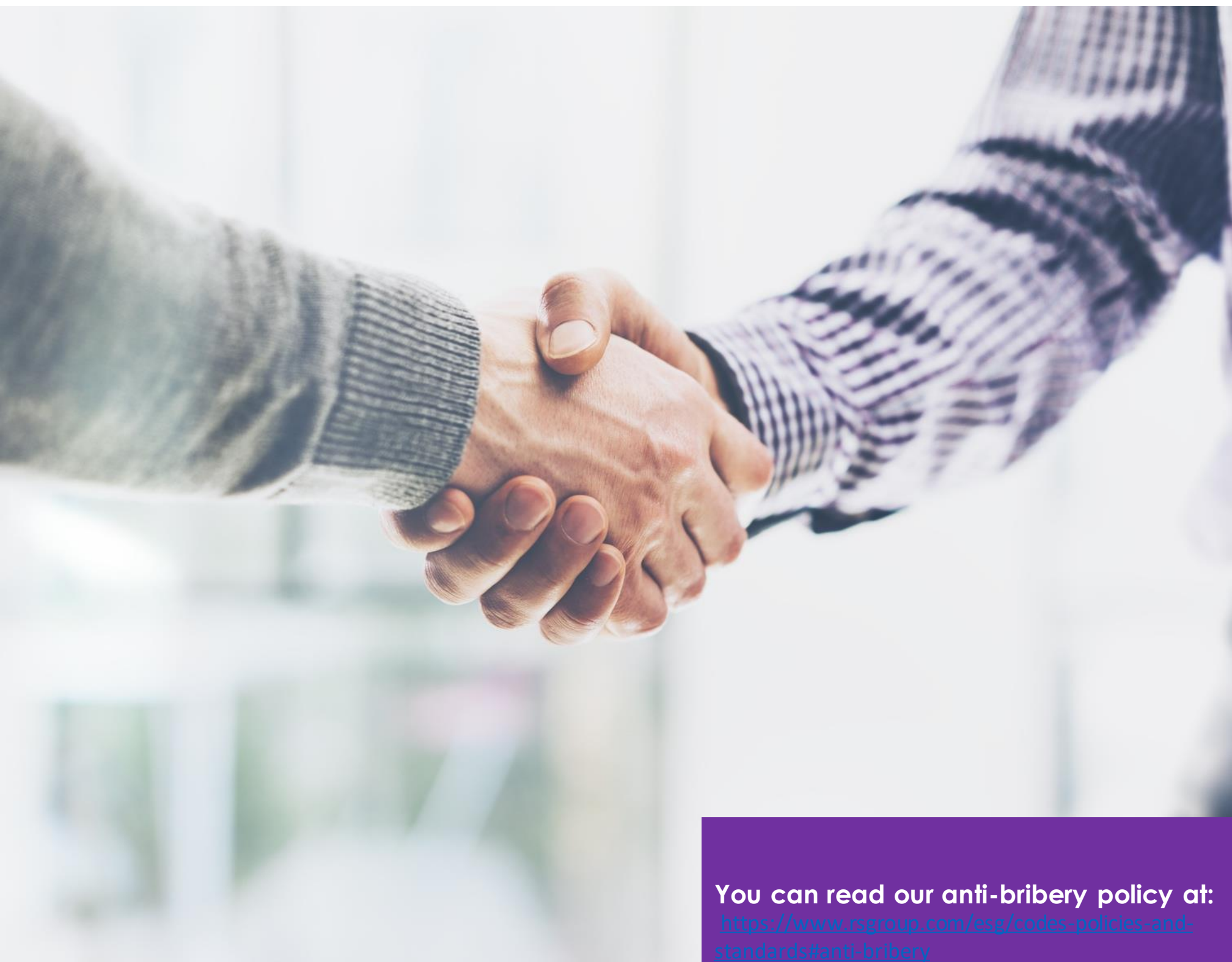
<https://www.rsgroup.com/esg/ethics-compliance>

# Bribery and corruption

## Zero tolerance.

At RS Group, we take a zero tolerance approach to all forms of bribery and corruption. This includes operating sensible gift and hospitality limits, prohibiting facilitation payments and ensuring that strict processes govern marketing incentive campaigns.

We embed our anti-bribery policy internally through a risk-based program of training, controls and leadership. Suppliers, distributors and other third parties are also required to meet our ethical and legal standards.



You can read our anti-bribery policy at:  
<https://www.rsgroup.com/esg/codes-policies-and-standards#anti-bribery>



# Modern slavery and human trafficking

**RS Group does not tolerate human rights abuses, the use of slavery, forced or child labour in our supply chain or in any part of our business.**

We follow fair and ethical recruiting practices to ensure potential employees are supported and protected even before they step foot on our premises.

We provide our employees a respectful workplace that is free from harassment, discrimination, and corruption, and where employees know they can speak up if they ever witness such misconduct. We provide fair working conditions and adhere to responsible payment practices.

We work closely with our suppliers and take proactive steps to ensure that Modern Slavery is not taking place in any part of our business or supply chains. We will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour, or which do not recognise freedom of association or collective bargaining. We require that the suppliers and third-parties we work with should hold their own suppliers and third parties to the same standards. We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.



You can read our latest Modern Slavery statement at:  
<https://www.rsgroup.com/esg/ethics-compliance>

and our Modern Slavery policy at:  
<https://www.rsgroup.com/esg/ethics-compliance#tab-1124714493-tab2>



# Trade compliance

Global governments strictly regulate the export and import of products, technology and software, many of which are subject to national and international export control legislation.

RS Group has established Group procedures and local instructions and resources to support our businesses in complying with relevant laws and regulations.

Within RS Group, the Trade Compliance Team are responsible for ensuring that no item is imported or exported without first determining if a licence is required. Reviews are performed on all proposals, contracts, deliverables, shipments, and transfers with import or export control considerations to ensure that the correct procedures are followed, in line with relevant legislation.





# Conflict minerals

RS Group supports the efforts of human rights organisations to end violence and atrocities in Central Africa, specifically the Democratic Republic of Congo (DRC) and nine adjoining countries: Republic of Congo, Central African Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda. We are committed to ethical practices and seek to keep our supply chain and products free from conflict minerals.

We require suppliers to have due diligence processes in place to identify and verify the sources of minerals contained in their products. We look to suppliers to advise on the conflict mineral status of products and welcome dialogue from customers on areas of their conflict minerals compliance that we may be able to support.

RS Group is committed to source responsibly and will consider suspending or discontinuing engagement with suppliers where we identify a reasonable risk in this regard.





# EU REACH regulations

The EU REACH regulations are designed to protect human health and the environment from risks that chemicals may pose.

We support the objectives of the EU REACH regulations and offer similar regimes that exist and are developing around the world. The effects of REACH and the obligations arising for industry will continue to develop over many years. We welcome dialogue with customers on areas of compliance that we may be able to support. Areas of interest typically include the following:

- **Continuity of supply** - we maintain an active dialogue with suppliers to minimise disruption to the supply of any products affected by REACH
- **Substances of Very High Concerns (SVHCs)** - we will inform customers of the presence of SVHCs if present at >0.1% by weight of an article as soon as this information is available from our suppliers
- **Registration obligations** - as part of regulations in place since January 2021, where RS PRO branded articles containing substances which fall under EU REACH criteria are placed on the EU market, we submit information on such articles to the ECHA SCIP database.





# EU RoHS Directive

The RoHS Directive forms part of the EU's approach to reducing toxic waste from electrical and electronic equipment. We closely monitor legislation that will impact the electronics industry and, in 2005, were one of the first companies to be awarded the BSI "RoHS Trusted" kitemark.

On our RS UK website <https://uk.rs-online.com/web/> we publish the RoHS status of products, based on information provided by our manufacturer partners. You will find over half a million products flagged as RoHS compliant, with RoHS certificates available to download.

If you require a RoHS compliant version of a product that has not been flagged, you can contact our technical helpline on 0044 3457 201 201. We will endeavour to support your request, including carrying out in-house compliance verification where appropriate.





# Quality

At RS Group, we are proud to provide high quality products and solutions to our customers. Through our quality management systems we strive for 100% customer satisfaction, ensuring that products and services delivered to customers meet expectations, requirements and specifications.

Quality systems are fully embedded in our overall business management systems. We continually seek to improve our operating processes, products and services using a combination of 'Lean Sigma' methods and tools.

We assure customers of our ability to deliver unrivalled levels of service and product quality by aligning our business processes with requirements set out in a number of quality standards.

Our businesses have achieved a number of certifications, which include:

- ISO 9001:2004
- ISO 14001:2004
- ISO 17025:2005
- ISO 45001:2018
- ESD S20.20:2014
- ISO 17025:2017
- RoHS Trusted Kitemark
- RISQS
- CEMARS
- Cyber Essentials
- JOSCAR Registered



For more details and to download certificates, visit:

<http://uk.rs-online.com/web/generalDisplay.html?id=aboutRS/our-certifications>



# Counterfeit electronic parts

At RS Group, we value the confidence that customers place in our business and the products that we sell. We partner with a trusted supply chain network of original manufacturers and a select group of authorised and accredited distributors.

The robust processes that we have in place to protect customers from fraudulent counterfeiting activity are subject to continuous improvement. Should counterfeit product ever be suspected, RS Group has robust contingencies in place to ensure any affected delivery is withdrawn from sale and securely quarantined.

In-house testing, including XRF screening, is complemented by an independent third party test laboratory as required, and, where necessary, a robust product recall procedure is in place.





# Data protection and cyber security

At RS Group, we have a number of policies and processes in place to comply with data protection laws and to protect the personal information of our customers, suppliers and people. Our data protection framework is continuously evolving to meet increasing regulatory demands, and we are conscious that this is an area of regulation that will experience further change.

We are registered as a data controller under the UK Data Protection Act. Where required, we are also registered with local data protection or privacy authorities.

We hold Cyber Essentials accreditation and continue to invest in cyber security, with a strategy designed to address this evolving and ever-present risk. Group-wide policies and minimum standards are in place and all staff receive regular training on cyber security, supplemented by ongoing and varied security awareness messaging.



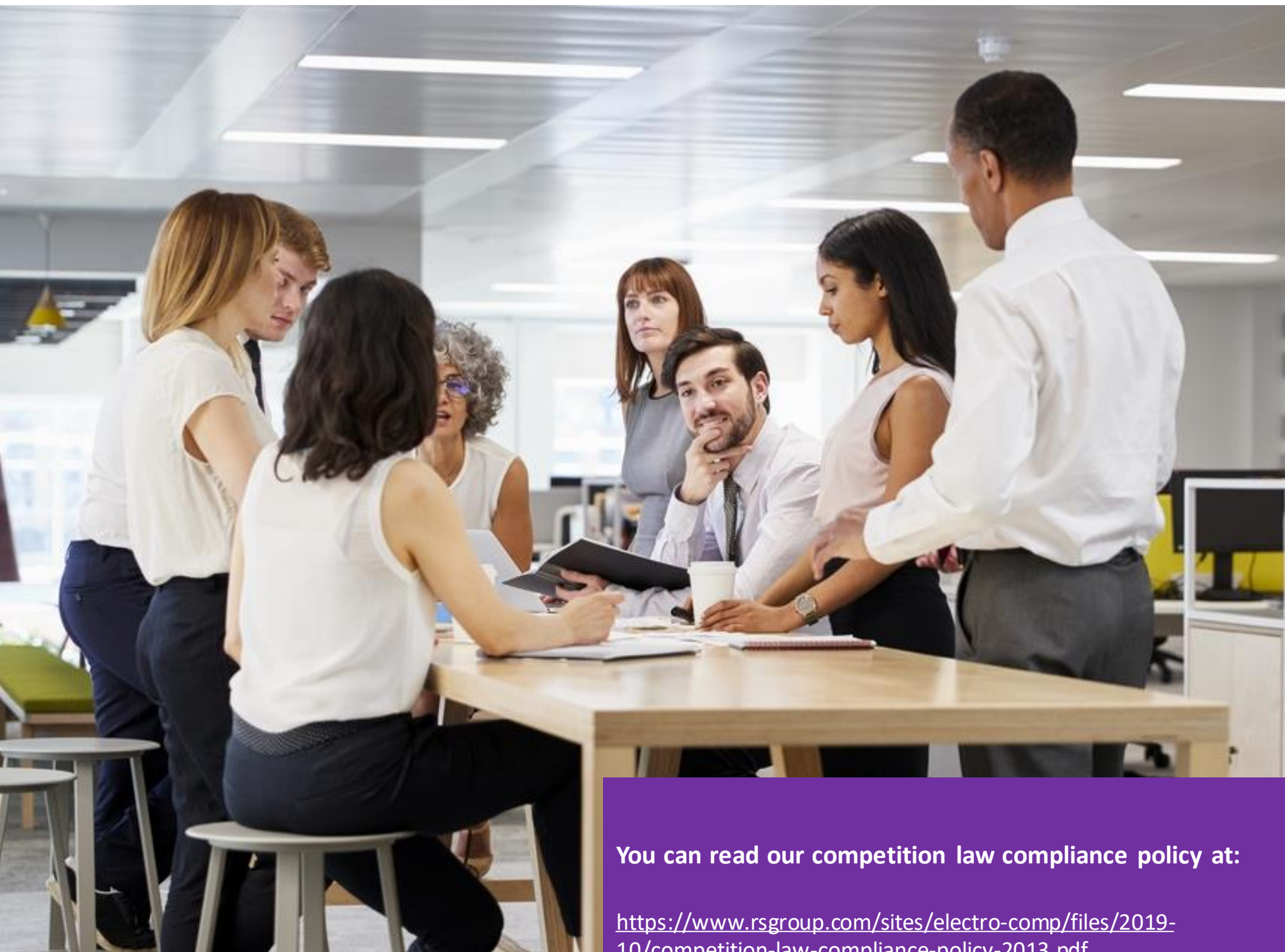


# Competition law

Competition puts businesses under pressure to provide the best goods, services and value, because customers can otherwise choose to buy elsewhere.

Companies that engage in anti-competitive behaviour not only risk severe legal penalties but also deprive their customers of the choice, innovation, quality, and competitive prices of a well-functioning competitive market.

At RS Group, we are proud to compete fairly and solely on the basis of merit. We use policies, processes, training, and leadership to embed our competition law compliance policy and maintain an appropriate degree of independence from our competitors.



You can read our competition law compliance policy at:

<https://www.rsgroup.com/sites/electro-comp/files/2019-10/competition-law-compliance-policy-2013.pdf>



RS PRO provides our customers with an ever-expanding range of over 70,000 high quality, competitively priced products that we are proud to put our name to.

Detailed reviews and audits are carried out with manufacturers of RS PRO goods to check adherence to our ethics and compliance standards. These are scheduled on a risk-based approach and include visits to manufacturer premises.

Our auditors and supplier-facing teams receive ISO auditor training to ensure industry standards and our own high standards are adhered to. Embedding this philosophy is at the heart of what RS PRO stands for.

RS PRO have labs in the UK & China where our engineers ensure our products have been subjected to vigorous compliance tests, inspections and audits. Our evaluation process ensures that the RS PRO products are compliant with industry standards and, by working with issuing offices, checks are made to ensure accreditation and validity status, as well as suitability for markets being sold into.



Products are inspected by our leading engineers to eliminate potential flaws or design issues. Any flaws or issues are communicated back to the manufacturer with corrective action requested.

Products are also tested to guaranteed levels of quality and performance by our engineers. As a result, every RS PRO product receives the RS PRO seal of approval. It's our guarantee of quality, performance, service and our high ethical standards.



**AUDITED**  
In compliance with industry standards



**INSPECTED**  
By leading engineers



**TESTED**  
For guaranteed quality and performance



You can learn more about RS PRO on our website:

[http://uk.rs-online.com/web/generalDisplay.html?id=rspro&intcmp=UK-WEB\\_-\\_HP-Brand18\\_-\\_March17\\_-\\_RS%20Pro](http://uk.rs-online.com/web/generalDisplay.html?id=rspro&intcmp=UK-WEB_-_HP-Brand18_-_March17_-_RS%20Pro)



# Questions? Concerns? Speak to us!

At RS Group, we have a dynamic and diverse network of experts and managers overseeing our compliance efforts. We hope the brief summaries in this brochure have given you a flavour of the high standards of ethical and legal conduct that we are committed to.

We are similarly committed to an open and accountable culture where employees and others can express concerns in the knowledge they will be taken seriously and treated fairly without retaliation. Our Speak Up policy and facility encourages reporting of concerns about an illegal act or a breach of our Code of Conduct.

We also encourage feedback from any customer or supplier who is ever concerned about our ethics or compliance and they can confidentially report any serious concerns by email to: **speakup@rs.rsgroup.com**

Reports are treated in accordance with our Speak Up policy, acknowledged and acted upon as appropriate.

If you have further questions about our compliance approach, please let us know. You can also read more about key governance areas in our Code of Conduct.



**You can view our code of conduct at:**

<https://www.rsgroup.com/esg/ethics-compliance>