# Group Responsible AI Charter

**October 2026**

## 1. Charter scope and purpose

The Responsible AI Charter (the Charter) sets out RS Group's commitment to developing, deploying, and using Artificial Intelligence (AI) technology in a way that is ethical, sustainable, human-centred, and reflects our values. It applies to employees, contractors, suppliers, partners, customers, and other stakeholders who use AI in any business, engagement, or relationship with RS Group (RS).

AI can accelerate our business strategy delivery, creating value for all our stakeholders. We empower our people to automate and innovate confidently, using AI that is governed responsibly and ethically. Our intelligent automations portfolio provides leadership and visibility to all AI activity at RS.

AI has the potential to deliver significant benefits for organisations and society when used responsibly. This Charter defines the principles that guide our approach to AI, helping us balance innovation and efficiency with accountability, trust, and respect for people and the environment.

The Charter provides a principles-based framework to support decision-making about AI and to ensure that AI use is aligned to our purpose, mission, values, and strategy. The Charter is not a prescriptive policy or detailed checklist of obligations. RS employees must also comply with the Group AI Policy and Group Acceptable Use Policy.

The Charter applies globally to all AI and Intelligent Automation undertaken on behalf of RS, including solutions developed internally, procured from third parties, or embedded within products and services. It applies wherever AI is used by our stakeholders in connection with products, services, processes, or activities involving RS Group.

We expect our employees to adhere to the principles set out in this Charter when contracting with any AI provider, and will provide internal guidance for integration of these principles in the procurement process. We expect our suppliers, partners, and other third parties providing AI-enabled products or services to align with these principles, in line with our Ethical Trading Declaration.

## 2. Positive outcomes

We will seek to deploy AI where it delivers measurable value for customers, colleagues, shareholders, and society. We will prioritise AI use cases that improve productivity, safety, accessibility, sustainability, customer experience, and decision quality, while seeking to minimise environmental and societal impacts. Our aim is for the benefits of AI to outweigh the resources consumed.

All use of AI within RS must be fully aligned to our business strategy. As part of our screening and due diligence processes, we will ensure that any AI solutions we adopt are aligned to our purpose, mission, values, and strategy. We commit to only working with AI providers who actively manage the alignment of their AI to positive outcomes.

## 3. Environmental responsibility

Advancing sustainability is a core pillar of our 2030 ESG action plan. We are committed to efficiency and environmental responsibility across our operations, including the development, procurement, and use of AI technologies.

We recognise that AI can have environmental impacts, particularly through the energy, water, and infrastructure demands of data centres. We understand large-scale AI infrastructure may affect those living nearby through land use, resource consumption, and associated emissions.

At the same time, we believe AI has significant potential to deliver net positive outcomes for society, beyond existing noteworthy advances in healthcare and scientific discovery. For RS Group specifically, the AI-enabled optimisation of our distribution network, demand forecasting, supply planning, inventory control, energy management, waste minimisation, and asset condition monitoring, can all help to reduce our environmental footprint.

We consider environmental impacts when selecting and building AI solutions. We seek to work with technology partners that demonstrate credible commitments to reducing their own environmental footprint, particularly through proactive strategies related to renewable electricity, energy, and water management, and the lifecycle of key components. We will assess these commitments as part of the selection criteria and monitoring for strategic AI partners.

We monitor the emissions associated with AI usage through procurement spend on AI solutions, which forms a part of our Scope 3 (value chain) emissions reporting, disclosed in our annual reporting suite. These emissions, while insignificant in the overall value chain footprint, are included within the scope of our Scope 3 reduction target, which is validated by the Science-Based Targets initiative (SBTi). We will continue to evolve this emissions calculation in line with our Scope 3 inventory and methodology development.

We will actively pursue opportunities to use AI in support of our sustainability goals, including improving energy efficiency, reducing emissions, optimising resource use, and strengthening operational resilience.

## 4. People, skills, and culture

Responsible AI depends on informed, capable and empowered people. We are committed to building the practical AI skills, human capabilities, and awareness needed to use AI effectively, responsibly and with appropriate judgement. We will support continuous learning so colleagues understand the opportunities, limitations, and risks of AI, can critically evaluate AI-generated outputs, and know when human judgement, challenge, or intervention is required.

Responsible AI at RS is grounded in the values that guide how we work every day: we are one team, who deliver brilliantly, by doing the right thing, to make every day better. These values shape how we develop, adopt and govern AI across our business.

We will take an inclusive and role-relevant approach to AI capability building, recognising that people have different starting points, learning needs, working environments, and levels of access to technology. We will seek to provide fair opportunities for colleagues to develop relevant skills and confidence, including those in operational and non-laptop-based roles. This will include foundational AI literacy, role-relevant development, specialist capability where needed, and support for leaders and managers to guide responsible adoption and change.

We set clear expectations for the acceptable and responsible use of AI through our policies, governance processes, training, and internal communications. Employees are provided with mandatory training focused on the responsible use of AI within RS. We track participation and completion rates to help ensure colleagues have the knowledge and skills needed to use AI thoughtfully. Employees can also access optional training modules and additional resources on demand.

We are committed to using AI fairly, inclusively, and without discrimination. AI-supported decisions that materially affect people will remain subject to appropriate human oversight, with individuals accountable for reviewing outputs and exercising judgement. Our governance and risk assessment processes will consider potential impacts on accessibility, inclusion, wellbeing, skills, roles, and the employee experience, alongside legal, ethical, security, and environmental risks.

This includes maintaining an inventory of AI systems, classified using EU AI Act risk categories, reviewing and approving AI use cases, and providing appropriate human oversight of decision-making. Our approach is overseen by a cross-functional AI Steering Group, as described in Section 7.

## 5. Customers, suppliers, and partners

Many of our AI capabilities are provided or supported by third-party suppliers and partners. We expect these organisations to meet appropriate standards of ethical behaviour, information security, privacy, resilience, and sustainability.

Where risk warrants, we conduct due diligence on AI-enabled services and expect suppliers to be transparent about how their AI is trained, operated, governed, and used, particularly where outcomes may affect customers, suppliers, or colleagues.

Our contractual arrangements are designed to protect RS Group and its stakeholders. Where appropriate, they include provisions covering data protection, confidentiality, acceptable use, subcontracting, audit and assurance rights, incident notification, service continuity, and the secure return or deletion of data. We also restrict the use of RS data and content for AI model training without explicit authorisation.

We respect intellectual property rights and expect others to do the same. We only use content in AI systems where we have the necessary rights or permissions, and we take steps to protect RS information, content, and proprietary assets.

In line with our ESG supplier action plan and with guidance through our Supplier ESG Handbook, we encourage responsible environmental performance across our AI and technology supply chain. We favour partners that have credible, validated science-based targets, hold an EcoVadis rating, and align with recognised ISO standards for environmental management, health & safety, and quality. We expect them to monitor and be transparent about energy use, water consumption, and carbon emissions, with periodic reporting that demonstrates progress. We also expect suppliers to be transparent about the storage, processing, retention, and permitted use of RS data, including any use for the training, testing, tuning, or improvement of AI models.

We are committed to openness about our use of AI. Where appropriate, we will make clear when customers are interacting with AI systems or receiving AI-generated content. AI-supported decisions should be explainable, with material decisions remaining subject to appropriate human oversight and approval.

## 6. Compliance

We are committed to complying with applicable laws, regulations, and recognised standards relating to AI, including the EU AI Act, and we are working towards obtaining ISO/IEC 42001. To ensure this compliance, the Group AI Policy outlines the expectations for colleagues related to the use or development of AI systems in all geographies (see Section 10).

As AI technology, regulation, and societal expectations continue to evolve, we will regularly review and strengthen our approach to responsible AI to ensure this Charter remains relevant, effective, and aligned with emerging good practice.

We will not use customer, supplier, employee, partner, or other stakeholder data to train or improve AI models unless there is an appropriate legal basis, the necessary rights and permissions, and approved governance in place.

## 7. Governance and accountability

Responsible AI requires effective governance, clear accountability, and appropriate oversight. We maintain robust governance arrangements to ensure AI is used responsibly, transparently, securely, and in alignment with our strategic objectives.

Executive accountability for responsible AI and the approval of this Charter sits with the Group Chief Information Officer, Chief of Corporate Services & CoSec, and Chief People Officer. With support of the IS&T and ESG teams, the AI Steering Committee will review this Charter at least annually, and more frequently where required, to reflect changes in legislation, regulation, organisational priorities, or significant developments in AI technology.

Day-to-day oversight is provided by representatives from the Information Security and Technology (IS&T), Environmental, Social and Governance (ESG), Legal, Indirect Procurement (IDP), and People functions. ESG identifies the framework for responsible suppliers and oversees partner alignment, while the IS&T and IDP teams are responsible for implementing framework within our AI strategy and ensuring the framework is adhered to by our suppliers and partners. The People function is responsible for supporting responsible AI adoption through capability building, learning, workforce planning, engagement, and consideration of the people impacts associated with AI-enabled change.

All new AI use cases, including AI capabilities introduced into existing solutions, are subject to review through an established AI risk assessment process managed by a dedicated cross-functional team. This cross-functional oversight supports horizon scanning, consideration of regulatory and market developments, strategic alignment, and the escalation of AI-related risks, issues, and opportunities to the relevant senior leader(s).

Accountability is embedded through defined business and technology ownership for all applications, including those that use AI. We maintain records of AI systems and their use in line with applicable legal and regulatory requirements and retain appropriate documentation of key decisions and deployments.

AI risks are assessed and managed throughout the system lifecycle. AI systems are only deployed after an appropriate review, with controls in place to identify and

address potential risks, errors, or unintended consequences. AI-generated outputs should be subject to appropriate human review. Material AI risks are monitored on an ongoing basis to support alignment with organisational objectives and compliance with legal and regulatory obligations.

Information security and privacy are integral to our approach. We implement measures to protect the confidentiality, integrity, and availability of AI systems, manage third-party risks appropriately, and seek to ensure personal data is handled responsibly throughout its lifecycle. AI-related incidents are managed through an established incident management process.

## 8. Glossary

For the purposes of this Charter, RS Group applies the following definitions:

| Term | Definition |
|---|---|
| Artificial Intelligence | The ability of a machine to perform some of the functions we usually associate with human minds. |
| Intelligent Automation | The business application of AI, predictive analytics, and automation technologies to improve processes, support decision-making, enhance customer and supplier experiences, create new revenue opportunities, and deliver measurable improvements in efficiency, quality, and governance. |

## 9. Speaking up

Concerns relating to this Charter can be raised using the RS Group Speak Up whistleblowing process, available to all employees, customers, suppliers, partners, and any other stakeholders.

## 10. Related policies

| Policy name | Relationship to this policy |
|---|---|
| Group AI Policy | Provides guidance and direction regarding the appropriate and safe use of AI within RS Group. |
| Group Acceptable Use Policy | Provides the framework for RS Group establish a culture of openness, trust, and integrity in our use of Information Systems, which includes systems with AI capability. |
| Group Speak Up Policy | Sets out how stakeholders should report any concerns they have about an illegal or unethical act, data privacy, actions that endanger health (or the environment), or human rights and modern slavery. |

## 11. Version control

| Version | Creator/Reviewer | Date | Next review | Changes |
|---|---|---|---|---|
| v1.0 | Emily Balcombe (ESG Manager); Andy Crick (Enterprise Architect) | October 2026 | October 2027 | Policy created with support from Adam Griffiths, Emily Millett, Oliver Bradley, and Gurpreet Kaur. |