

# Modern Slavery Act Transparency Statement 2025

# 1. Our business and background

RS Group plc is a global product and service solutions provider for industrial customers, enabling them to operate efficiently and sustainably. We stock more than 750,000 industrial and electronic products, sourced from over 2,500 leading suppliers, and provide a wide range of product and service solutions to customers.

We support customers across the product lifecycle, whether via innovation and technical support at the design phase, improving time to market and productivity at the build phase, or reducing purchasing costs and optimising inventory in the maintenance, repair and operation phase. We offer our customers tailored product and service propositions that are essential for the successful operation of their businesses and help them save time and money.

Further information can be found on our website www.rsgroup.com.

Under section 54 of the UK Modern Slavery Act 2015, all incorporated businesses with over £36m in annual turnover and conducting business in the UK are required to publish a slavery and human trafficking statement. This statement is for our financial year 2024/25, ending 31st March 2025.

# 2. Our approach

RS Group has earned a reputation for integrity, fair dealing and ethical behaviour. We are determined to preserve that reputation and ensure that wherever we do business or operate around the world, we exert positive influence. Acting ethically and in line with our values is rooted in our culture and reflected in our Code of Conduct. We expect everyone working for us, and with us, to always follow our Code of Conduct and act with integrity.

We do not allow any form of slavery or human trafficking to take place in any part of our business. We will not use child labour (in line with the ILO Minimum Age Convention), nor will we use forced labour. We have put in place safeguards to drive adherence to these same standards in our supply chain, and will take appropriate action, up to and including termination, against employees or suppliers that violate



our Anti-Slavery and Human Trafficking Policy. Modern Slavery is managed via our Global Compliance and Ethics programme which covers both our own employees and our supply chain.

## 3. Our framework

#### Risk assessment

We use a geographical risk assessment based on the Modern Slavery Index to identify our higher risk geographies and inform our next actions to be taken. This includes ensuring awareness training is targeted appropriately according to risk. We hold a regular Group Responsible Procurement Meetings of internal subject matter experts to examine risks within the supply chain, including Modern Slavery.

### Code of conduct, policy framework and awareness training

We operate a Group-wide <u>Anti-Slavery and Human Trafficking Policy</u> to inform our employees, contractors, supply chain and other stakeholders of our commitment to address Modern Slavery.

The policy gives guidance on identifying and reporting Modern Slavery and is reviewed annually to ensure that it is up to date with current legislation and best practice.

Our <u>Group Code of Conduct</u> also highlights our stance on Modern Slavery and provides advice on what to do if Modern Slavery is suspected within the workplace or supply chain. It empowers employees to "Speak Up" if they identify any areas of concern, including concerns relating to potential modern slavery risks.

All employees across the Group are required to complete training on the Code of Conduct, which includes a specific section on Modern Day Slavery with guidance on the identification of potential modern slavery risks and how to report it.

## **Supply chain**

We have a complex supply chain, sourcing products from over 2,500 suppliers and working with manufacturers to produce RS branded products via our RS PRO business.

As part of our commitment to high ethical and environmental standards we seek to extend our global policies and standards to our suppliers and other business partners. The Group's Ethical Trading Policy sets out our minimum requirements for suppliers and is intended to ensure that RS Group sources products in an ethical and consistent manner while working with suppliers to improve their social and environmental practices. We ask suppliers to sign up to our Ethical Trading Declaration or provide evidence of their own equivalent policies.

We are also members of Sedex to help provide assurance that our supply chain is working to high standards, particular in relation to labour and human rights.

This includes audits on some suppliers which are identified as higher risk and seeking assurances from our supply chain via our Ethical Trading Declaration. We also ask all our RS PRO suppliers to become Sedex members.

In addition, in support of our ESG action plan we have regular interactions with our suppliers such as events, quarterly business reviews (QBRs), and ESG communications. We work with our strategic suppliers to set ESG objectives which are monitored through the QBRs. More details can be found in our ESG Supplier Handbook and our ESG Report.

#### Governance

We have a dedicated, full time, Head of Group Compliance and Ethics who is responsible for delivering our Compliance and Ethics Programme and maintaining the delivery of our Modern Slavery objectives. We also have a regular Responsible Procurement Steering Group to bring together subject matter experts in our company to discuss ethical issues within the supply chain and set standards, policies and processes for our Responsible Procurement agenda.



### Whistleblowing and investigating concerns

RS Group has an open and transparent culture underpinned by our Group Speak Up Policy, embedded across the Group through language translations and awareness campaigns. The policy encourages colleagues to report suspected wrongdoing as soon as possible and without fear of detrimental treatment as a result of raising a concern in good faith. We offer a range of channels for raising concerns, including an independent, global, and multi-lingual external reporting service managed by Navex. This service allows concerns to be raised anonymously if preferred. It is available to employees, external stakeholders (such as suppliers) and the public and is available 24 hours a day, 7 days a week.

All reports are received by our General Counsel and Head of Group Compliance and Ethics and dealt with efficiently, effectively and consistently. The Speak Up programme is overseen by the Audit Committee.

## 4. Action taken

In 2024/25 we committed to providing specialised training to our network of Ethics Champions who are currently present in 31 countries. Dedicated Modern Slavery training was rolled out to all 50 Ethics Champions by our Head of Group Compliance and Ethics, in addition to the provision of day-to-day advice and support on identifying and mitigating modern slavery risks. The top 180 leaders across the Group also received training on Modern Slavery as part of their Code of Conduct training.

As part of the review and ongoing monitoring of our supplier relationships, we continue to assess the slavery and human trafficking risks arising from relationships through regular ethics and compliance reviews as well as incident driven audits. 63% of our spend is now with suppliers signed up to our Ethical Trading Policy (which includes modern slavery requirements), and 75% of our private label spend (through our RSPRO business, is now through suppliers with SEDEX membership. We identify appropriate steps to address any risks identified in our supplier relationships, which may include dedicated training sessions, placing contractual obligations on suppliers, working with the supplier to make improvements or ceasing to work with a supplier altogether.

In our downstream relationships, we carried out our annual Code of Conduct risk assessment, which includes assessment of Modern Slavery specifically, with our partners in countries with a high-risk profile for Modern Slavery. We have also worked with a number of our significant customers in their own supply chain audits, including around modern slavery risks.

# 5. Next steps 2025/26

In 2025/26 we will continue to work towards improvement of the measures we already have in place to identify and address modern slavery and human trafficking risks. Actions we aim to take for the year ahead include:

- more detailed training to all our employees on the factors which can indicate modern slavery or human trafficking, through our Code of Conduct annual mandatory training;
- continued focus on increasing from the proportion of our suppliers complying with our Ethical Trading Policy or their own equivalent policies; and
- review and update our Anti-Slavery and Human Trafficking Policy

This statement was approved by the Board of RS Group plc on 15 May 2025.

Simon Pryce

Chief Executive Officer
For and on behalf of the Board of Directors

