



GROUP

SPEAK UP POLICY 2022

RS GROUP PLC

1. Introduction

The principles and values set out in our Code of Conduct, available [here](#), are a fundamental part of our organisational culture: our Leadership Team and the Board are committed to promoting an open and accountable culture where employees can express concerns in the knowledge they will be taken seriously. If something is troubling you and you have concerns about an illegal or improper act or breach of our Code of Conduct which you think we should know about or look into, please tell us.

2. Purpose and Scope

The purpose of this policy is to set out how you should report any concerns you have about an illegal or improper act, or a breach of our Code of Conduct, and how the Group would deal with your report.

This policy covers all RS Group Employees and anyone who develops a concern in a work related context (including former employees, shareholders, interns, contractors, suppliers etc).

3. What Does the Policy Cover?

This policy covers any illegal or improper practices, or any breach of the Group's policies, which could include the following (this is not an exhaustive list):

- Criminal offences, including theft, fraud and bribery
- Failure to adhere to legal obligations (including competition law or tax law concerns)
- Bullying or harassment
- Actions which endanger the health and safety of our employees or the public or which present a serious risk to the environment (including product safety or compliance concerns)
- Breaches of any Group or local policy



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Any activity falling under the categories above should be reported under this policy. You will need to use your judgment as to whether a particular action or inaction falls within these categories. If something is troubling you which you think the Group should know about or look into, please report it. If in doubt – raise it!

4. Safeguards

We recognise that the decision to 'speak up' can be a difficult. We will not tolerate any victimisation, and will take appropriate action to protect any person who raises a concern in good faith, including any necessary disciplinary action against anyone victimising a Speak Up reporter due to their report. Wherever possible, we will protect the identity of any member of staff who raises a concern and who does not want their name disclosed. However, this may not always be possible, as any investigation process may in itself reveal the source of information and a statement by the individual concerned may be a necessary part of the evidence.

We will protect individuals from false or malicious reports. Disciplinary action will be taken against any member of staff who is discovered to have made allegations falsely or maliciously.

We recognise that a concern that is sincerely felt and expressed may, on investigation, prove to be unfounded. In such cases, we will try and ensure that the negative impact of either a false or unfounded allegation on any person is minimised as far as possible.

5. How to Make a Report

Reports can be made either orally or in writing. There is no required format and no proof of your concerns is necessary. However, you will need to provide the reasons for your concern, and the more information you can provide the better.

When raising a concern you should, if you are a Group Employee, report it first to your line manager or local People team; however, if you prefer, you can raise it with a member of your local senior management team, or if you don't feel comfortable making your report at the local level, you can do so to one or more of the following:

- General Counsel & Company Secretary
- Vice President Group Legal
- Chief Information Security and Compliance Officer
- Vice President Group Operational Audit and Risk

As an alternative, Group Employees can make a report to our external whistleblowing service, where you can report your concerns to Navex Global, a wholly independent third party. Reports can be made 24 hours a day, 7 days a week, by telephone or through our dedicated web portal. Reports made to Navex Global can be made anonymously. More detailed information on this facility is available to every employee through the intranet and via physical posters in office and



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warehouse locations. Reports made to Navex are passed, anonymously if requested, to the General Counsel, a senior member of the Group Legal team and the Vice President of Group Operational Audit and Risk.

If you are not a Group Employee, you can make a report by emailing SpeakUp@RS-Components.com. Reports can still be made anonymously and you do not need to use an email address that includes your name, if you do not wish to. All received emails will be treated in line with this policy and the inbox is only accessible by General Counsel, a senior member of the Group Legal team and the Vice President of Group Operational Audit and Risk.

6. Our Response

The action that we take will depend on the nature of the report. The matters raised may be investigated by local management, Group management, Group Operational Audit, or Group Legal. Some cases may be referred to the People team to progress through the grievance process or the disciplinary process. Alternatively, they may be subject to independent inquiry. Relevant matters may also be subject to investigation by external agencies such as law enforcement. Initial enquiries will determine the most appropriate process for the consideration of the report – in all cases the independence of the investigation will be a key factor in that determination. Any necessary action that is required urgently would be carried out ahead of any assessment/investigation process.

Each report will be acknowledged within 7 days. We will also indicate to you how we propose to progress the matter. If a decision is made not to investigate under the Speak Up policy, an explanation will be provided of the reasons for the decision.

Some issues may be investigated without the need for initial enquiries to be made. Similarly, some concerns may be capable of resolution by agreed action without the need for investigation. Concerns or allegations raised which fall within the scope of specific established procedures will be referred for consideration under those procedures.

You will be given as much information as possible on the outcome of the investigation, subject to the constraints of the Group's duty of confidentiality or any other legal constraint, to ensure as far as possible that you can be assured that your concern has been considered and addressed if necessary.

Although we cannot guarantee that we will respond to all matters in the way that you might wish, we will always handle the matter fairly and properly. By following this policy, you will help us to achieve this.

January 2022