



Rexel Australia **Modern Slavery Statement FY24**

Reporting period:
1st January – 31st December 2024

rexel

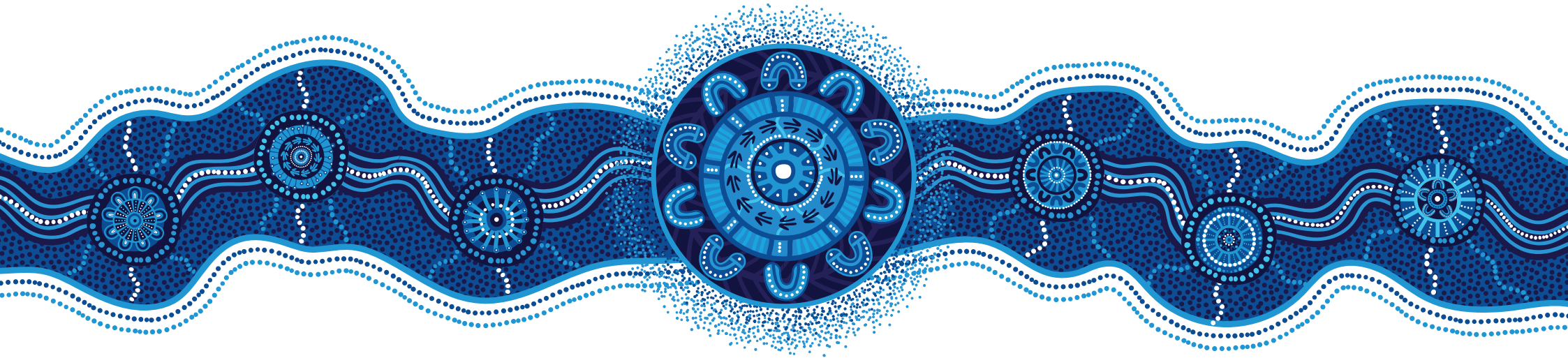
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Acknowledgement of Country

Rexel acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and embraces the spirit of reconciliation, working towards the equality of outcomes and ensuring an equal voice.

At Rexel we recognise, value and respect Aboriginal and Torres Strait Islander peoples' deep relationship, connection and responsibility to land, waterways and communities as central to identity and culture. This report was produced on the lands of the Gadigal People of the Eora Nation and we specifically acknowledge the traditional custodians of the lands on which our branches reside and operate.

"Empowered Future" – Rhonda Sampson, Kamilaroi Artist.

Rexel Australia commissioned "Empowered Future" in June 2025 to represent our commitment to reconciliation and our vision for a more inclusive, connected, and sustainable future.

01 Message from our CEO



At Rexel Australia, we are committed to sustainability and upholding the highest standards of human rights throughout our operations, supply chain and communities. This commitment is demonstrated by our Sustainable Selection range, a range of over 4,000 products considered top performers in terms of carbon emissions and circularity and manufactured by companies committing to Rexel's Sustainable Supplier Charter. We believe sustainability extends beyond reducing pollution and emissions; it involves actively reducing harm to people globally.

This is Rexel's 5th modern slavery statement, highlighting the steps we took in 2024 to identify, manage, and mitigate modern slavery risks in our supply and operations chain.

Key achievements in 2024 include:

1. Updating our supplier assessment questionnaire based on learnings from our 2023 risk mapping exercise;
2. Collaborating with our French parent in auditing the manufacturing facilities of some solar panel suppliers; and
3. Consolidating and updating Rexel's modern slavery policies and training program to emphasise the importance of identifying and reporting modern slavery.

Modern slavery in any form is unacceptable. While we are proud of our progress in 2024, Rexel acknowledges the inherent risk of modern slavery in our operations and supply chain. We remain diligent in making continuous improvements to address this issue.

A handwritten signature in black ink, appearing to read 'Rob McLeod', with a small dot at the end.

Rob McLeod

CEO - Rexel Australia & the Pacific

**ELECTRIFYING SOLUTIONS
THAT MAKE A SUSTAINABLE
FUTURE POSSIBLE**

02 About this Statement

This Modern Slavery Statement (**Statement**) sets out actions taken by Rexel Holdings Australia Pty Ltd and its related entities (collectively, **Rexel Australia**) to assess and address modern slavery risks in its operations and supply chain for the financial year commencing 1 January 2024 and ending 31 December 2024, in compliance with the Modern Slavery Act 2018 (Cth) (the **Act**).

This Statement is prepared and submitted by Rexel Holdings Australia Pty Limited (the Australian holding company in the Rexel Australia Group) and all its controlled entities as defined under the Act, being:

- Rexel Electrical Supplies Pty Limited; and
- Australian Regional Wholesalers Pty Limited.

A joint statement has been prepared as these entities use the same policies, systems and processes, operate in the same sector and have shared suppliers.

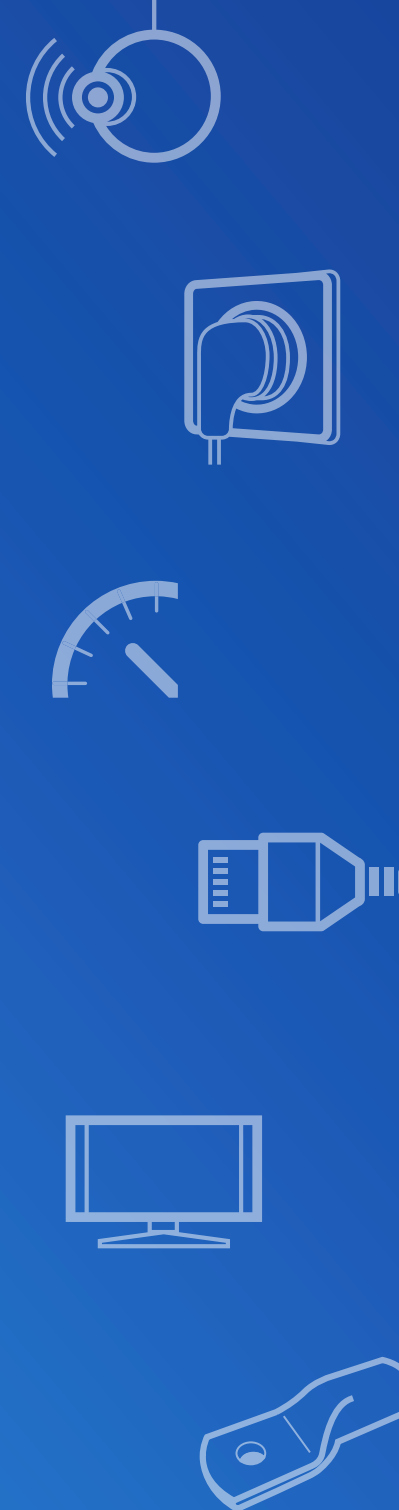
This Statement meets the mandatory criteria set out in the Act.

03 Consultation and Engagement

Rexel Australia applies uniform policies, systems, and processes across all the Australian entities. The senior leadership team develops and approves Rexel Australia's environmental, social, and governance (**ESG**) strategy, which encompasses human rights and the preparation of the annual modern slavery statement. The leadership team is supported by the Head of ESG and the Modern Slavery Working Group, which is responsible for creating and implementing operational and procurement controls to mitigate modern slavery risks within the business.

The Modern Slavery Working Group, comprising senior leaders from our Supply Chain, Legal, and HR teams, provides quarterly updates to Rexel Australia's governance committee. These updates, along with any resulting operational or procedural changes, are compiled and reported through the preparation and submission of an annual modern slavery statement.

Rexel Australia's leadership team has approved this Statement prior to its submission and approval by the relevant company board. The directors of each of the three trading entities mentioned above have endorsed this joint Modern Slavery Statement.

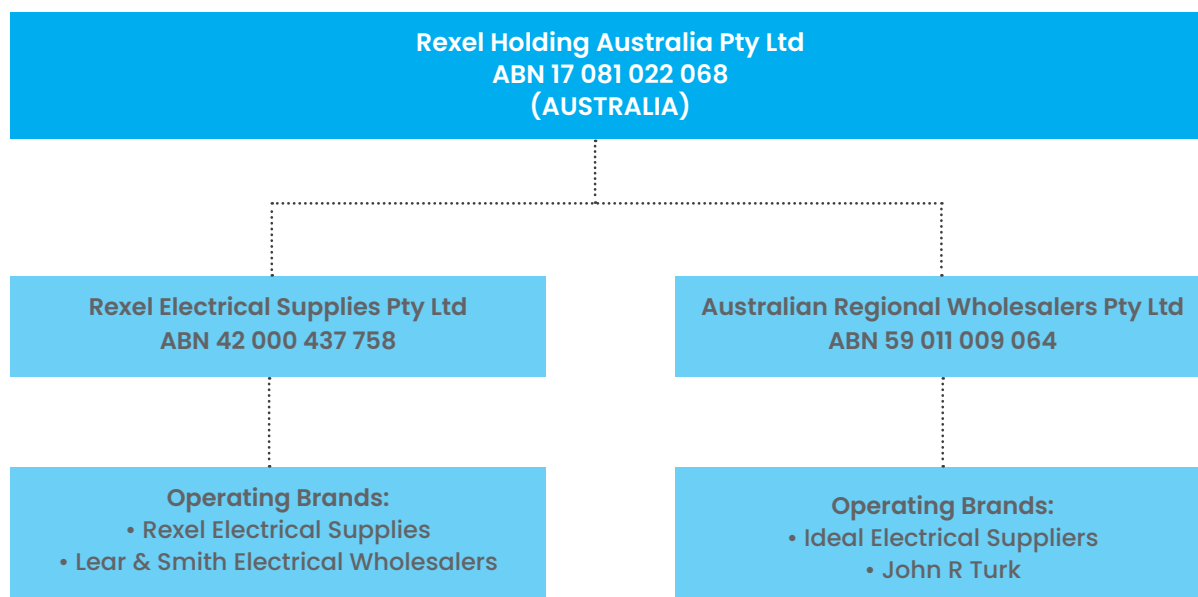


04 Our Structure, Operations and Supply Chain

Who We Are

Rexel Australia is an electrical distributor supplying professional electrical products such as cable, lighting and switchgear to electrical contractors and directly to various commercial, industrial and government organisations. We trade through our subsidiaries – Rexel Electrical Supplies Pty Ltd and Australian Regional Wholesalers Pty Ltd.

Our current corporate structure is set out below:



Rexel Australia is part of an international group of companies and our ultimate parent company is Rexel SA, headquartered in Paris, France. Rexel SA is listed on the Eurolist market of the Euronext Paris stock exchange.



Our Operations

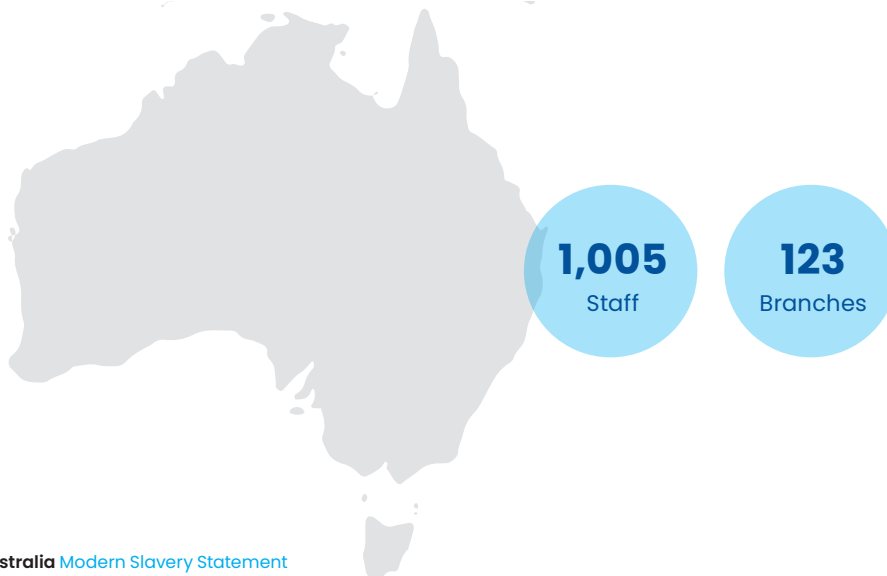
Rexel Australia operates nationally, with its corporate office and national service centre in North Ryde, New South Wales.

As at 31 December 2024, we had an approximate annual revenue of approximately \$980 million and operated across 126 sites, including 123 branches and 2 distribution centres (1 in New South Wales, the other in Queensland), and a national support office.



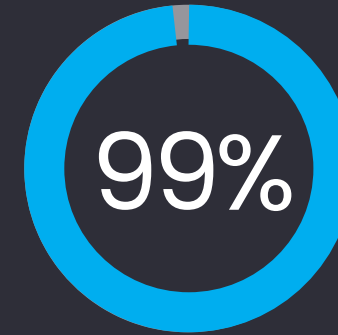
Our Employees

As at 31 December 2024, Rexel Australia's workforce comprised of 1,005 staff working across our operating businesses, 97.3% of whom are permanent full and part-time employees. Our entire workforce is based in Australia.



Our Supply Chain

In 2024, we spent approximately \$840 million, encompassing a wide and varied network of over 4,600 suppliers. Approximately 99% of our expenditure is with Australian businesses. Nonetheless, we appreciate that many of our products purchased from local companies are either manufactured overseas or incorporate significant components from abroad.



99% of our core suppliers are operating in Australia

Our suppliers can broadly categorised into 4 groups:

Global market leading manufacturers

Established global brands with local and offshore manufacturing, often strategically linked to multiple Rexel companies worldwide.

Local suppliers

Australian-based suppliers with both local and offshore manufacturing.

Resale of Bizline products

Bizline, owned by Rexel Group, is exclusively distributed through Rexel-owned branches in several countries, including Australia.

Non-inventory suppliers and sub-contractors

Australian suppliers providing services like property leasing, utilities, waste management, cleaning, security, office supplies, and IT support.

SUPPLIERS

05 Our Modern Slavery Risks

In line with the United Nations Guiding Principles on Business and Human Rights, Rexel Australia understands “modern slavery risks” as referring to the potential for its business to cause, contribute or be directly linked to modern slavery. We recognise that the level of modern slavery risk in our operations and supply chains is based on several factors. We have incorporated geographic, sector and product specific factors into our risk assessment processes. Apart from the risk to our business, Rexel Australia also assesses modern slavery risks from the lens of “risk to people”.

Operational Risks

Rexel Australia protects the labour standards and human rights of its employees through its human resources policies and recruitment practices.

Our employees are employed directly, with their employment terms and conditions set out in employment contracts governed by Australian employment laws and relevant awards. All recruitment is managed through a centralised recruitment function, which includes ensuring that candidates’ Right to Work checks are completed prior to offers being made.

Remuneration for all employees is reviewed on an annual basis. Additionally, all permanent employees are given the opportunity to participate in a global engagement survey at least once every year. This complements the existing internal and external grievance reporting mechanisms in place in Australia.

We use temporary labour in our operations in very limited circumstances. To reduce modern slavery risk, we channel temporary appointments through a small number of well recognised labour hire agencies where possible. Where a licensing regime is in place, we use licensed labour hire providers.

Supply Chain Risks

Rexel Australia conducts ongoing risk assessments of its suppliers to identify modern slavery risks. These assessments look at a supplier’s industry, the geographical risk based on their location and products being supplied, but also their supply chains and the raw materials used in the production of goods and services that they provide to us.

In 2023, Rexel engaged Fair Supply to map its supply chain, using their Integrated Assessment Engine. Fair Supply’s global Multi-Regional Input Output table links supply chain data from 38,000 industry and country sector combinations. This process then generated a modern slavery risk profile reflecting 10 tiers of our suppliers. Based on this risk mapping process, the highest risks of modern slavery in our supply chain can be summarised as follows:



Accordingly, the highest risks of modern slavery in our supply chain can be summarised as follows:



Solar Panels

We are excited about our role in driving an energy transformation for both our business and our customers. However, we are acutely aware of the real and potential risk of human rights abuses associated with global solar energy supply chains. The procurement of solar panels is particularly high-risk for modern slavery due to vulnerabilities throughout the supply chain. Specifically, polysilicon used in manufacturing some solar products has been linked to the exploitation of Uyghur and Kazakh minorities in Xinjiang, China. Solar panels represent approximately 2% of Rexel's total sales, which limits our ability to influence. Despite this, we commenced an on-site audit program in collaboration with our global parent in 2023. In 2023, we audited 1 supplier and 3 suppliers in 2024.



Electronic manufactured goods (e.g. mobiles, laptops, modems)

The electronics manufacturing industry is particularly vulnerable to modern slavery due to its reliance on production in less developed countries, where labour rights oversight may be weaker. In 2021, we focused on assessing these suppliers by reviewing their modern slavery risk practices and procedures, and by having them complete supplier assessment questionnaires. Furthermore, modern slavery risks are prevalent within the supply chains of these products, especially in the sourcing of raw materials from high-risk regions. For instance, essential resources for batteries, such as lithium and cobalt, are often sourced from areas known for human rights abuses, like the Democratic Republic of Congo. In 2024, we have completed desktop audits of home battery suppliers.





Uniforms

Many of our employees wear uniforms, and we recognise that the manufacture of these garments and their associated supply chains pose significant modern slavery risk. Labour conditions in textile production, particularly uniforms, are high-risk due to manufacturing in less developed countries with lower labour rights vigilance. Additionally, modern slavery risks are prevalent in the supply chains, especially in sourcing raw materials from high-risk regions. To influence supplier engagement, we primarily purchase from one main supplier in this category. Although our primary workwear provider did not disclose any modern slavery risk factors in its self-assessment, we plan to collaborate with this supplier throughout 2025 to further review these risks. However, we are cognizant of our limited spend and the limited ability to influence at both Rexel's and our supplier's level.



Cleaning Services/Security

Although our risk mapping exercise with Fair Supply did not identify this as a high-risk area not identified as a high-risk area through our analysis with Fair Supply, we know that cleaning and security services are usually assessed as a relatively high inherent risk. This is due to factors such as underpayment, remote work locations and reduced visibility over subcontracting arrangements. While this remains a low spend area where we have limited ability to influence, we have taken steps to commence including modern slavery obligations in cleaning contracts. We have also centralised our security services spend and included modern slavery obligations in our contracts.



Food and accommodation

The hospitality industry is vulnerable to modern slavery risks due to its reliance on low-skilled or migrant workers. Our data mapping indicates that spending in the hotel and restaurant sectors presents an elevated risk of modern slavery in the first tier of the supply chain, on a per dollar spend basis. Given the ad hoc nature of our expenditure in this area and our limited ability to influence, we focus on training our staff to identify and report potential instances of modern slavery. Where we are entering into contracts with hospitality providers, we are including modern slavery obligations in those contracts.



06 Our Modern Slavery Risk Management Framework

Policies and Procedures

At Rexel Australia, we have a zero-tolerance approach to any form of human rights abuses including modern slavery, and are committed to having in place effective systems and controls to safeguard against any form of modern slavery taking place within our business or supply chain. This commitment has materialised through a strong suite of policies and controls that support the management of modern slavery risk and our response, which are listed and described below:



Rexel's Modern Slavery Policy sets out our commitment to the elimination of modern slavery, human trafficking, and all kinds of exploitation practices as well as our expectations of Rexel suppliers. It also aligns with the United Nations Guiding Principles on Business and Human Rights and the Modern Slavery Act 2018 (Cth).

It applies to all team members, contractors, and suppliers in Australia and overseas. It sets out our commitment to the elimination of modern slavery, human trafficking, and all kinds of exploitation practices as well as our expectations of Rexel suppliers.

The Modern Slavery Policy is regularly reviewed and was last updated in July 2024.



The Charter sets out Rexel's minimum expectations for ethical behaviour from our suppliers. This includes acting ethically and lawfully, respecting human rights and protecting employee rights.

Commitment to our Sustainable Supplier Charter is a key term in our master supply agreement for all key suppliers, and its principles are espoused in our standard purchase order terms.

As at 31 December 2024, Rexel's Sustainability Supplier Charter has been signed by suppliers representing at least 66% of our spend. Given the rollover period from supply contracts, this number is down from 2022, however, we expect this number to increase gradually as the master supply agreement is negotiated with a larger number of suppliers.



Our Whistleblower Policy encourages and facilitates the disclosure of any wrongdoing or misconduct in our working environment. It ensures that individuals who disclose wrongdoings can do so safely, securely and with the confidence they will be protected and supported. Concerns about modern slavery in Rexel Australia's operations and supply chain can be reported through this policy. The internal reporting channels are supplemented by an external Whistleblower hotline. This hotline is an independent and anonymous service to raise concerns, including about suspected modern slavery within our operations or supply chain. All reports to the hotline are taken seriously and are fully investigated.

Our Whistleblower policy is reviewed regularly and was last updated in September 2024.



Our remediation plan ensures that any victim of modern slavery is protected and outlines our action plan if any modern slavery cases are identified.



Our Human Resources team oversees our employment and workplace health and safety policies which include policies governing the employment relationships with our staff. These cover areas such as recruitment, performance management, grievance management, training and development, well-being health and safety, leave, benefits, flexible working, workplace giving and termination. Their purposes are to ensure fairness, compliance and a positive work environment.



Other Controls

We have several established procurement and operational controls in place aimed at reducing modern slavery risk within our supply and operations chain, which are subject to regular review to ensure continuous improvement. These controls are summarised below:

Procurement control: Rexel key suppliers	In mid 2023, we updated our key supplier agreement template to enhance modern slavery and ethical supply commitments. Our key suppliers must now make a standalone declaration that they have read and will comply with the Sustainable Supplier Charter.
Procurement control: Modern slavery questionnaire	In 2024, Rexel Australia developed an updated modern slavery questionnaire using online tools to improve response rate. This questionnaire includes inquiries about the supplier's modern slavery policies and procedures, known risks, and other relevant factors. The updated questionnaire was initially used for assessing Rexel Australia's renewable energy suppliers, however we now intend to use the questionnaire across our supply chain, including revisiting and updating suppliers who were initially assessed in 2022.
Procurement control: Third Party Due Diligence	Rexel Australia uses a third-party due diligence tool as part of the Rexel Group's global sanctions compliance framework to avoid relationships with sanctioned individuals or entities. This tool collects information on potential customers and suppliers, including regulatory actions and modern slavery findings. If adverse information is found, our compliance team reviews it against Rexel's third party due diligence policy, modern slavery policy and the Sustainable Supplier Charter to determine engagement. The tool has been in use for 24 months, currently allowing us continuously monitor over 500 suppliers to Rexel Australia, and over 6,000 suppliers across Rexel globally. We have also started using this tool to issue supplier assessment questionnaires, allowing us to consolidate information from the supplier together with the data from the tool. Early indicators show a rise in responses to supplier assessment questions sent using the third party due diligence tool.



Operational control: Recruitment and employee engagement	<p>Rexel Australia safeguards labour standards and human rights through its human resources policies and recruitment practices. Most employees are employed directly under contracts governed by Australian employment laws and relevant awards. Recruitment is centralised, ensuring that candidates' Right to Work checks are completed prior to offers being made.</p> <p>Annual remuneration reviews are conducted, and permanent employees participate in a yearly global engagement survey, complementing existing grievance mechanisms.</p>
Operational control: Recruitment and Training and awareness	<p>Rexel's training platform promotes continuous learning across a range of topics including our governance principles, including Modern Slavery, Employee Rights, Environmental Management and our Whistleblower Policy.</p> <p>In 2024, we updated our Modern Slavery training to inform and emphasise the specific modern slavery policies and processes that apply in Rexel Australia while also highlighting warning signs that staff should be vigilant about in their daily work.</p>
Procurement control: Rexel other suppliers	<p>For all other suppliers, including those contracting with Rexel Australia on an ad-hoc basis, our standard terms mandate compliance with national and international laws, including anti-bribery and anti-corruption regulations. Suppliers are also required to actively prevent modern slavery, adhere to all relevant modern slavery legislation, and operate in accordance with the principles outlined in international human rights agreements and the Sustainable Supplier Charter.</p>

Whistleblowing & Remediation of modern slavery risks

A strong speak-up culture, supported by an anonymous reporting mechanism, is a crucial part of our risk management framework. To facilitate this, we have both a local whistleblower policy and a global reporting system. We also maintain a modern slavery remediation procedure aligned with the United Nations Guiding Principles on Business and Human Rights, serving as our blueprint for addressing any harm caused by modern slavery within our business or supply chain.

There have been no reports of modern slavery during the reporting period. However, we acknowledge the pervasive nature of modern slavery in global supply chains and remain committed to enhancing our risk identification and assessment processes.

2024 Actions and Progress

In 2024, Rexel Australia focused on new goals following the completion of our supply chain mapping in 2023. Our objectives included expanding on-site audits for solar suppliers, rolling out a revised supplier assessment questionnaire, and updating staff training modules.



2024 Achievements

On Site Supplier Audits of Renewable Energy Suppliers

- We set ourselves a target of conducting at least 1 onsite audit in 2023, and were able to complete a total of 3 onsite audits of our solar suppliers with:
 - One supplier representing approximately 30% of the solar panels sold by Rexel Australia.
 - 2 further solar suppliers, who we are planning on using in the renewable energy space from 2025.

Supplier Assessment Questionnaire

- In 2024 we launched an updated supplier assessment questionnaire through an online third-party due diligence platform, targeting solar panel suppliers, cleaners, and strategic suppliers who had not completed an assessment in the previous 24 months.
- Questionnaires were sent to 22 solar panel suppliers, 11 solar accessories suppliers, and 5 cleanings services providers.
- Response rates were lower than anticipated due to a late-year strategy change, but we plan to continue this work in 2025.

Staff Training Update

- Updated the modern slavery training module, focusing on Rexel Australia's local efforts and steps staff can take to report instances of modern slavery.
- Added the updated training to the mandatory induction package for new employees.
- Began rolling out the updated training to national procurement team.

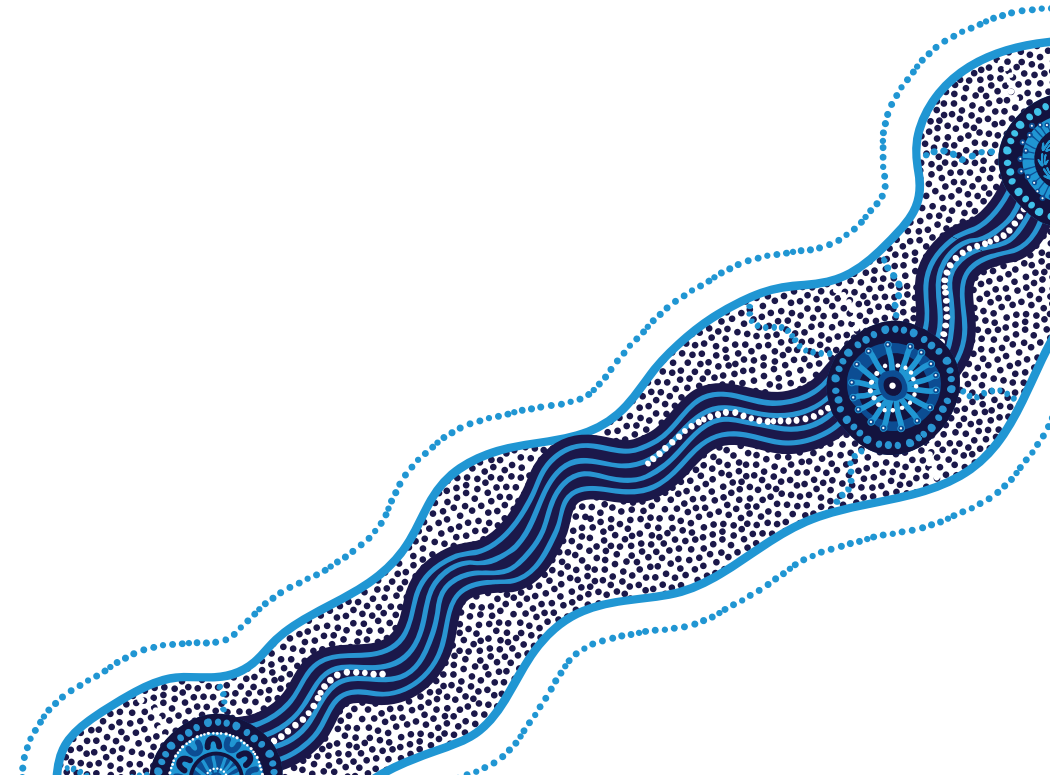


On Site Supplier Audits

In 2024, we committed to auditing at least one solar supplier.

In 2024, Rexel completed audits of three suppliers in China, either currently supplying or soon to supply solar panels to Australia. These audits, commissioned by our parent company and performed by an independent auditor, inspected the suppliers' manufacturing facilities. This effort aligns with Rexel's focus on modern slavery risks in solar panel supply chains.

The audits did not uncover any material risk of modern slavery, however we are currently assessing the results and identifying improvement actions with suppliers on a case-by-case basis. We plan to undertake at least one further audit in 2025.





Supplier Assessment Questionnaire

In 2024, our target was to issue our new supplier assessment questionnaire to 80% of our solar suppliers by expenditure, and our top 5 cleaning suppliers.

Initially, we used a third-party modern slavery due diligence platform to manage supplier assessment questionnaires. However, engagement was challenging due to automated third-party emails. We then redeveloped the supplier assessment questionnaire and moved the process internally, significantly increasing response rates (responses from approximately 70% of our solar suppliers by spend and three of our top five suppliers overall). Direct engagement by our procurement team also improved compliance with the supplier assessment questionnaire.

We integrated the supplier assessment questionnaire into our third-party due diligence platform, allowing for comprehensive reviews of supplier governance related issues at an initial desktop stage and issuing individual or bulk supplier assessment questionnaires as needed.

Due to the late change in strategy, we did not achieve the response rates we had set for solar suppliers and will continue this target for 2025. Additionally, we did not re-issue the questionnaire to cleaning and IT suppliers and have reset that target for 2025.



Improving Staff Training

Our goal for 2024 was to update the modern slavery module on our new training platform and achieve 100% completion by our national senior procurement team.

We updated our modern slavery module and added it to our global training platform. The updated module was rolled out to our national senior procurement team and included in the mandatory induction package for new starters. We fell short of this goal, with 90% completion amongst this team.

We are particularly proud of the new training module as it includes information specifically related to our Australian efforts, and directly addresses procurement staff's concerns about their role and the modern slavery indicators. We look forward to reaching more of our staff in 2025.






Zero Reports of Instances of Modern Slavery

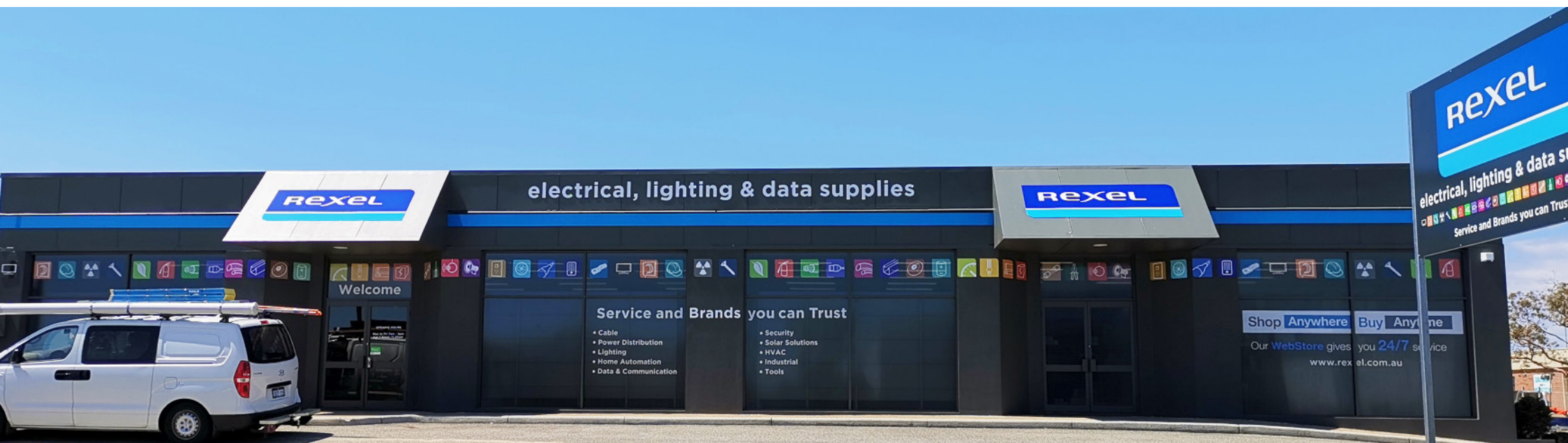
Rexel has not received any reports of modern slavery within its supply chain. We recognise the inherent risk of modern slavery in every supply chain and continuously review and monitor our reporting process to ensure it remains accessible and effective. We have continued to emphasise the importance of utilizing our whistleblower policies to report any concerns.



07 Future Actions

Rexel is committed to further developing its modern slavery risk program as part of our broader approach to responsible sourcing. In 2025, we plan to:

	GOAL	MEASURE
	Develop Strategy with SME Suppliers: Review whether current strategy is effective in understanding modern slavery risks for small to medium enterprise suppliers.	In uniforms: Work with at least 1 small to medium supplier to assess effectiveness of the supplier assessment questionnaire and better understand their supply chain risks.
	Expand Supplier Questionnaire Rollout: Continue rolling out the updated supplier assessment questionnaire across our broader supply chain.	Reach at least 50% of Stock suppliers by expenditure (including remaining Solar suppliers)
		Conduct Supplier Assessment Questionnaires to our top 5 IT and top 5 Cleaning Suppliers
	Enhance Modern Slavery Training: continue the rollout of our updated modern slavery training program	At least 70% completion across senior leaders in the business.



Statement Approval

This Statement has been reviewed and approved by the Board of Rexel Holdings Australia Pty Ltd on 25 June 2025 in its own capacity and on behalf of the entities that it owns and controls that are reporting entities for the purposes of the Modern Slavery Act (Commonwealth) 2018.



Rob McLeod

CEO - Rexel Australia & the Pacific

