

# ANIXTER AUSTRALIA PTY LTD

## Modern Slavery Statement for the Financial Year 2023

The statement below specifically covers Anixter Australia Pty Ltd ABN 68 055 815 551 and its wholly owned subsidiaries and related bodies corporate, Central Security Distribution Pty Ltd ABN 25 129 573 164, Inner Range Pty. Ltd. ABN 26 007 103 933, Wesco Australia Pty Ltd ABN 37 133 711 038, Rahi Systems Australia Pty Ltd ABN 48 627 388 381 (**Rahi**) and Allnet Technologies Pty. Limited ABN 25 003 888 757 (under voluntary external administration) (collectively **Wesco Anixter** or **Wesco Anixter Group**). In late 2022, Wesco Distribution, Inc. acquired Rahi Systems Inc., which is the ultimate holding company of Rahi and its subsidiaries in Australia. Integration efforts are ongoing to align Rahi's processes and procedures with Wesco Anixter's.

This joint statement for the Wesco Anixter Group sets out the steps taken during the financial year ended December 31, 2023, to ensure that slavery and human trafficking are not present in our supply chains and our own business.

### Section 1 – Our Structure

The Wesco Anixter Group's ultimate holding company is Wesco International, Inc.<sup>1</sup>, a leading global distributor of communications, network & security solutions, electrical & electronic solutions and utility broadband solutions. As a global organisation, Wesco International, Inc. and its affiliates which includes Wesco Distribution, Inc. (**Wesco Group**) help build, connect and protect applications and environments around the world. We promote responsible commercial practices at every level of our business and are committed to conducting our business ethically, honestly and in a lawful manner. To learn more about our business, visit [https://www.anixter.com/en\\_au/about-us/more.html](https://www.anixter.com/en_au/about-us/more.html). The Wesco Anixter Group is supported by centralised as well as local internal advisors and subject matter experts focused on compliance and corporate responsibility such as internal audit, trade compliance, legal, human resources, environmental, sustainability and health and safety.

Consultation occurs within the Wesco Anixter Group through participation by senior leadership team members in Regional Compliance Committee meetings that are held at regular intervals and by the organisation's internal advisors who support Wesco Anixter Group's compliance program in consultation with relevant senior leadership for each entity. In the preparation of this joint statement, we:

- (a) engaged with each of the reporting entities covered by this statement and discussed the details of the reporting requirements of *the Modern Slavery Act 2018* (Cth); and

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<sup>1</sup> Anixter International Inc. and Wesco International, Inc. were separate listed public entities on the New York Stock Exchange and merged on 22 June 2020. Our UK entities have published modern slavery statements in compliance with the UK Modern Slavery Act 2015. Not all of the entities that are part of the Wesco group of companies are subject to modern slavery legislation, however, all entities within the Wesco group are required to follow the Wesco group's global policies pertaining to the detection and prevention of modern slavery in the Wesco group's supply chain.

(b) consulted the reporting entities covered by this statement through engaging with senior leadership team members and functional leaders of each of those entities to understand their processes and approach in mitigating modern slavery risks in each of their businesses.

## **Section 2 - Our Business and Supply Chains**

Wesco International, Inc. and its subsidiaries conduct business in four regions, North America, the Caribbean and Latin America, Asia-Pacific and Europe, Middle East and Africa. Our key suppliers are manufacturers and distributors of communications, network & security solutions, electrical & electronic solutions and utility broadband solutions products. We endeavor to build long-term relationships with many of our suppliers in order to ensure that products in our inventory have been sourced in an ethical and lawful manner.

We also procure products and services from other vendors to run our business, such as IT, security, legal, financial and cleaning services providers, customs brokers, freight forwarders, commission agents, advisors and other service providers.

## **Section 3 - Risk Assessment and Due Diligence**

Business partners that represent a greater compliance risk are required to complete our business partner qualification process. If the business partner fails to satisfactorily complete the qualification process, they will not be paid without the prior approval of a Regional Compliance Officer.

Wesco Anixter's business partner qualification process includes a due diligence screening of all new or renewing business partners who will be performing services for or acting on our behalf in certain higher-risk countries or categories of service that we identified. High-risk countries are typically identified as (A) any country with a rating of Tier 2 or more in the previous year's Trafficking in Persons Report issued by the Department of State of the United States; or (B) any country with a Corruption Perceptions Index (CPI) score of 40 or less on the previous year's index issued by Transparency International; or (C) recommended for screening by a Regional Compliance Officer or the Wesco Group Chief Ethics and Compliance Officer. Our internal processes include continuous monitoring of some of our approved business partners who have been identified as higher risk and ongoing improvement of those internal processes to identify risks of modern slavery in our supply chains.

In 2023 we rolled out our new vendor setup forms and process to incorporate our Supplier Code of Conduct ensuring that from the onboarding stage we require compliance with our policies from our supply chain. These new forms are being rolled out to Rahi in 2024.

As part of our ongoing efforts to identify risks of modern slavery in our supply chain, in 2023, through an independent external party, the Wesco Group undertook an audit of suppliers to its Owned Brands business to identify modern slavery risks in its supply chain to ensure zero tolerance findings. Where risks have been identified, Wesco Group has resolved many of the risks identified and continues to work closely with its suppliers and internal advisors to resolve such identified risks in 2024.

## Section 4 - Policies and Contractual Controls

Wesco Anixter Group's commitment to ethical and socially responsible approach to doing business includes but are not limited to implementing and enforcing policies such as:

- [Code of Business Conduct](#)
- [Global Human Rights Principles](#)
- [Anti-bribery and Anticorruption Policy and Program](#)
- [Supplier Code of Conduct](#)
- [Business Partner Compliance Program](#)
- [Conflict Minerals Policy](#); and
- [Whistleblowing Policy](#).

In addition, suppliers and business partners are held to high ethical standards by our expectation that they abide by our policies.

To support such programs, Wesco Anixter is supported by teams of internal advisors and experts whose primary focus is on compliance and corporate responsibility, such as internal audit, trade compliance, legal, human resources, environmental, sustainability and health and safety. We will also call on external experts as needed. This support is available to every Wesco Anixter subsidiary. Using the combination of our programs and the support of internal experts, Wesco Anixter ensures its commitment to an ethical and socially responsible approach to doing business at all relevant times.

Wesco International, Inc. is a participant in the United Nations Global Compact, the world's largest corporate sustainability initiative. Prior to its merger with Wesco, Anixter Inc. was also a member of the United Nations Global Compact. All the companies within the Wesco Anixter Group have embraced the ten principles of the Global Compact, including principle 4 which prohibits all forms of forced and compulsory labor. You can find our 2023 Sustainability Report which describes our actions to continually improve the integration of the Global Compact and its principles into our business [here](#). The report outlines our efforts and commitment to environmental, social and governance sustainability and sets out our human rights overview (see page 11).

Our practices integrate respect for human rights, both directly within our global operations and throughout our supply chain position on the protection of human rights.

Our internal policies include [the Code of Business Conduct](#), which applies globally and is designed to guide all employees in complying with the laws and ethical principles that govern our business conduct.

In our standard supplier contracts, we require our suppliers to comply with the [Supplier Code of Conduct](#), which among other things, prohibits forced labor and human trafficking and requires our suppliers to source products only from third parties who uphold similar standards of integrity and ethical compliance as set forth in the code.

We also operate a [Business Integrity Line](#), available online or by phone to anyone for the submission of anonymous reports (where permitted by local law) of violations of our policies or the law. The Business Integrity Line is operated by an independent third party and is supported by our Anti-Retaliation and Whistleblowing policies that ensure the whistleblower is appropriately protected.

## Section 5 - Training

All Wesco Anixter employees receive training and are required to certify that they comply with the Code of Business Conduct Policy. This is in addition to targeted live training that are provided throughout the year.

## Section 6 - Oversight, Effectiveness and Accountability

The effectiveness of our programs can be measured through our company wide reporting processes which are supported throughout our organisation by internal and external resources including but not limited to internal audit, vendor compliance, trade compliance, legal, human resources, environmental, sustainability and health and safety teams.

All our compliance programs, including our efforts to combat slavery and human trafficking, are overseen and enforced at the highest level in the organization. The overall Compliance Program direction is determined by the Wesco Group's Chief Ethics and Compliance Officer. On at least a quarterly basis, the Chief Ethics and Compliance Officer informs the Wesco Group Executive Compliance Committee, consisting of the Wesco Group's Chief Executive Officer, Chief Financial Officer, Chief Human Resources Officer, General Counsel and Vice President of Internal Audit, of the status of compliance activities, Business Integrity Line reports received, and investigations conducted. The Chief Ethics and Compliance Officer also provides program updates and investigation reports to the Audit Committee of the Wesco Group's Board of Directors during its regular meetings.

The *Modern Slavery Act 2018* (Cth) mandatory reporting criteria are addressed as follows in our statement:

<b>Mandatory Reporting Criterion</b>	<b>Reference</b>
Identify the reporting entity.	Section 1
Describe the reporting entity's structure, operations and supply chains.	Sections 1 and 2
Describe the risks of modern slavery practices in the operation and supply chains of the reporting entity and any entities it owns or controls.	Section 3
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Sections 4, 5 and 6
Describe how the reporting entity assesses the effectiveness of such actions.	Section 6
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Section 1
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Integration efforts on a global scale are still in progress and is expected to continue until at least the end of 2024

This statement has been approved by the Board of Directors of Anixter Australia Pty Ltd.

*Timothy Martin*

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Tim Martin  
Director  
Anixter Australia Pty Ltd  
Date: