

# ANIXTER AUSTRALIA PTY LTD

## Modern Slavery Statement for the Financial Year 2020

The statement below specifically covers Anixter Australia Pty Ltd ABN 68 055 815 551 and its wholly owned subsidiaries, Central Security Distribution Pty Ltd ABN 25 129 573 164 (**CSD**), Inner Range Pty. Ltd. ABN 26 007 103 933 (**IR**) and Allnet Technologies Pty. Limited ABN 25 003 888 757 trading as XpressConnect Supply (collectively **Anixter** or **Anixter Group**).

This joint statement for the Anixter Group sets out the steps taken during the financial year ended December 31, 2020 to ensure that slavery and human trafficking is not taking place in our supply chains and our own business.

### Section 1 – Our Structure

The Anixter Group is a wholly owned subsidiary of Wesco International, Inc., 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<sup>1</sup> (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). CSD and IR were entities that were acquired in 2018 by Anixter where integration efforts are still under way. They are wholly owned subsidiaries and the business leadership from CSD and IR report to business leaders in Anixter. Additionally, CSD and IR are 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.

### Section 2 - Our Business and Supply Chains

Wesco International, Inc. and its subsidiaries conduct business in four regions, North America, 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 up long-term relationships with many of our suppliers, which help us to ensure that products in our inventory have been sourced in an ethical and lawful manner.

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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. Integration efforts are under way and pending completion of this Anixter Inc. and its subsidiaries and Wesco International, Inc. and its subsidiaries will continue to follow and comply with its policies and procedures immediately prior to the merger. 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.

In addition to product vendors, we also have vendors which help us 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 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.

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 which 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. Our internal processes include continuous monitoring of some of our approved business partners who have been identified as higher risk.

### **Section 4 - Policies and Contractual Controls**

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:

- [Ethics and Business Conduct Policy](#)
- [Global Human Rights Principles](#)
- [Anti-bribery and Corruption 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, 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 Anixter subsidiary. Using the combination of our programs and the support of internal experts, Anixter ensures its commitment to ethical and socially responsible approach to doing business at all relevant times.

In 2012, Anixter Inc. became a participant to the United Nations Global Compact, the world's largest corporate sustainability initiative. Anixter Inc. has embraced the ten principles of the Global Compact, including principle 4 which prohibits all forms of forced and compulsory labor. You can find our Corporate Responsibility Report which describes our actions to continually improve the integration of the Global Compact and its principles into our business [here](#).

Our position on the protection of human rights is summarized in our statement on [Global Human Rights Principles](#): we are committed to integrating respect for human rights into our practice throughout our supply chain.

Our internal policies include the [Ethics and Business Conduct Policy](#), which applies globally and is designed to assist us 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, where anyone may online (at [Anixter.ethicspoint.com](http://Anixter.ethicspoint.com)) or by telephone anonymously (where permitted by local law) report violations of our policies or the law. The Business Integrity Line is operated by an independent third party and supported by our Anti-Retaliation and Whistleblowing policies that ensure the whistleblower is appropriately protected.

### **Section 5 - Training**

All Anixter employees receive training and are required to certify that they comply with the Ethics and Business Conduct Policy annually. 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. Chaired by a Regional Compliance Officer, Regional Compliance Committees assess compliance risks, and oversee and monitor both global and local regional compliance initiatives in their respective regions.

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 6  |
| 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 2021 |

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



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Tim Martin  
Director  
Anixter Australia Pty Ltd  
Date: 30 June 2021