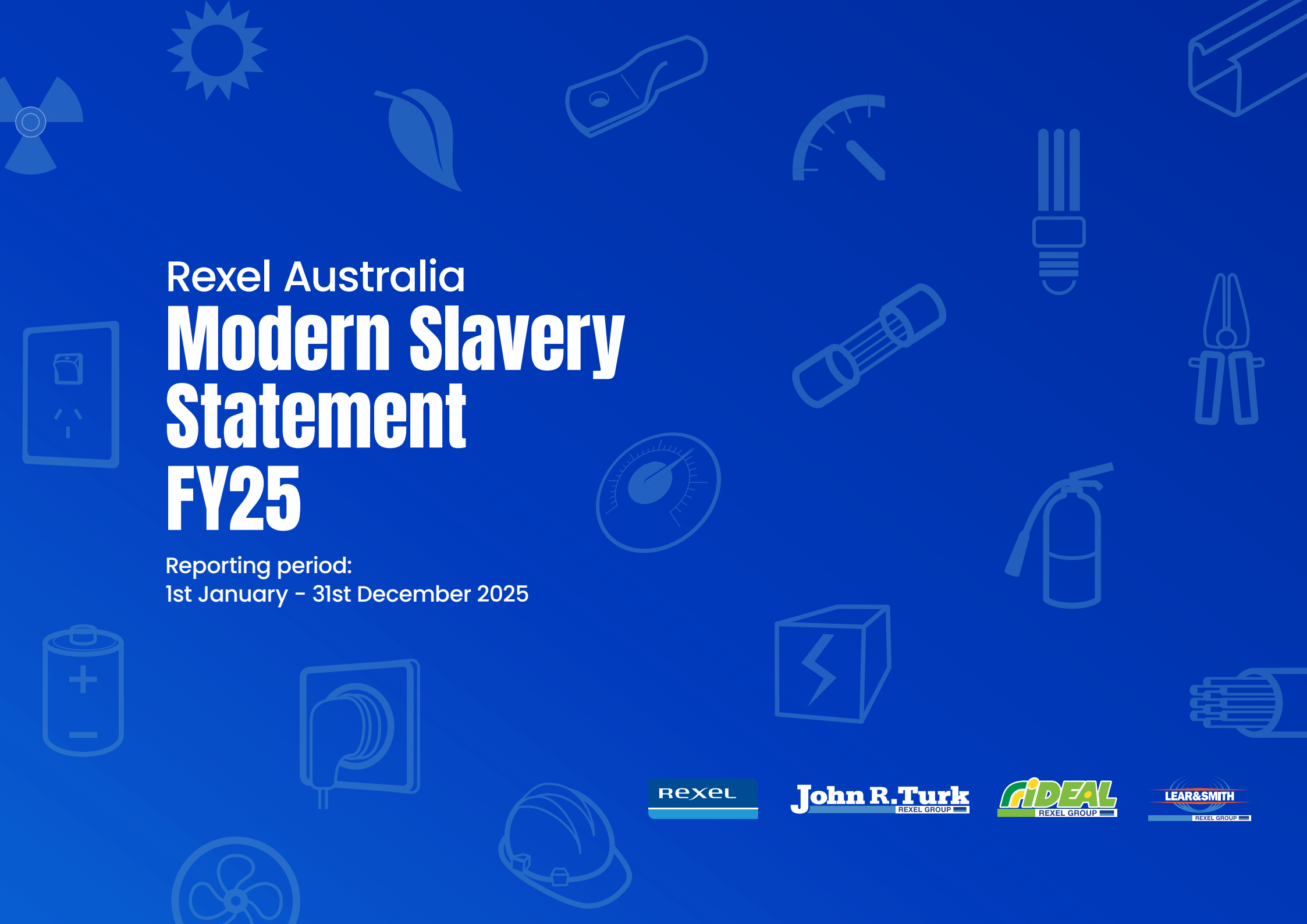




Rexel Australia **Modern Slavery Statement FY25**

Reporting period:
1st January – 31st December 2025

rexel

John R. Turk
REXEL GROUP

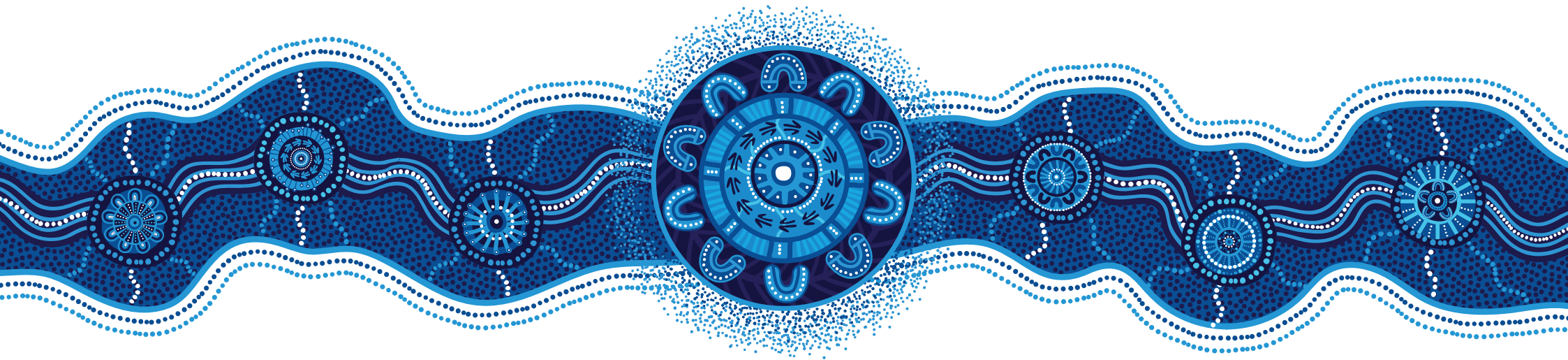
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Contents

01	Introduction	3 – 5
	CEO Statement	3
	About this statement	4
	Consultation and Engagement	5
02	Our Structure, Operations and Supply Chain	5 – 7
	Who We Are	5
	Our Operations	6
	Our Employees	6
	Our Supply Chain	7

03	Our Modern Slavery Risks	8 – 10
04	Our Modern Slavery Risk Management Framework	11 – 17
	Control Framework	11
	Policies and Procedures	11
	Other Controls	13
	Whistleblowing & Remediation of modern slavery risk	14
05	Actions Taken in 2025	15–16
06	Future Planning	17



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 CEO Statement



At Rexel Australia, we see good governance as good business, extending not just within our business but also into our supply chains. Modern slavery risks remain complex and often hidden, requiring disciplined, risk-based judgement across our operations and supply chain. In 2025, we have continued to mature our approach by embedding stronger systems, enhancing supplier engagement and refining how risks are identified and escalated.

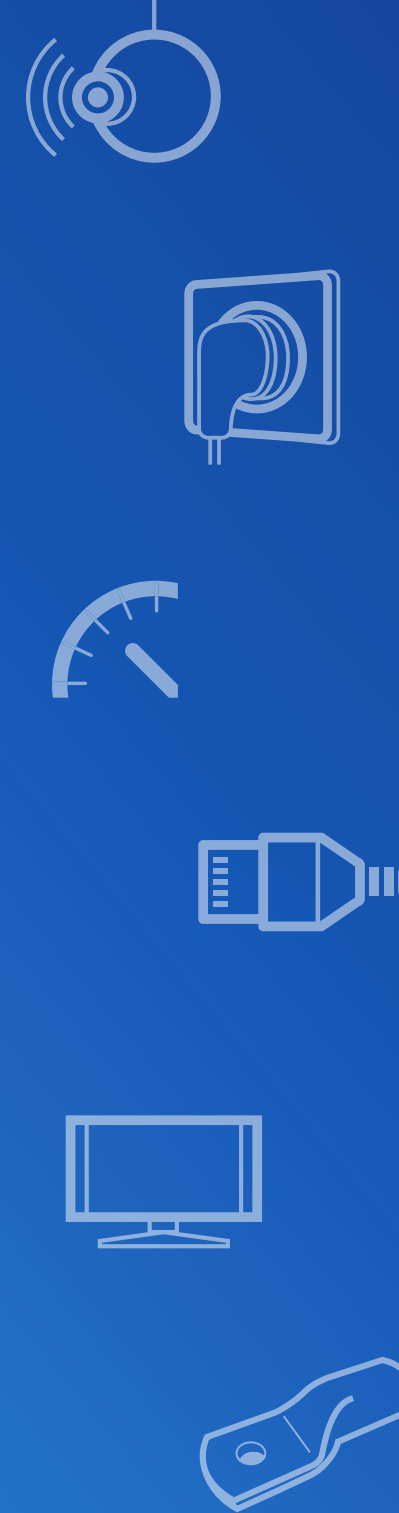
Looking ahead for 2026, growth in solar power systems and home battery technologies introduces increased exposure to complex global supply chains. In 2026, we will prioritise strengthening controls in these higher-risk areas.

A stylized, handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Benjamin McIntosh

CEO – Rexel Australia & the Pacific

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



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 2025 and ending 31 December 2025, 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.

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 regular 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.

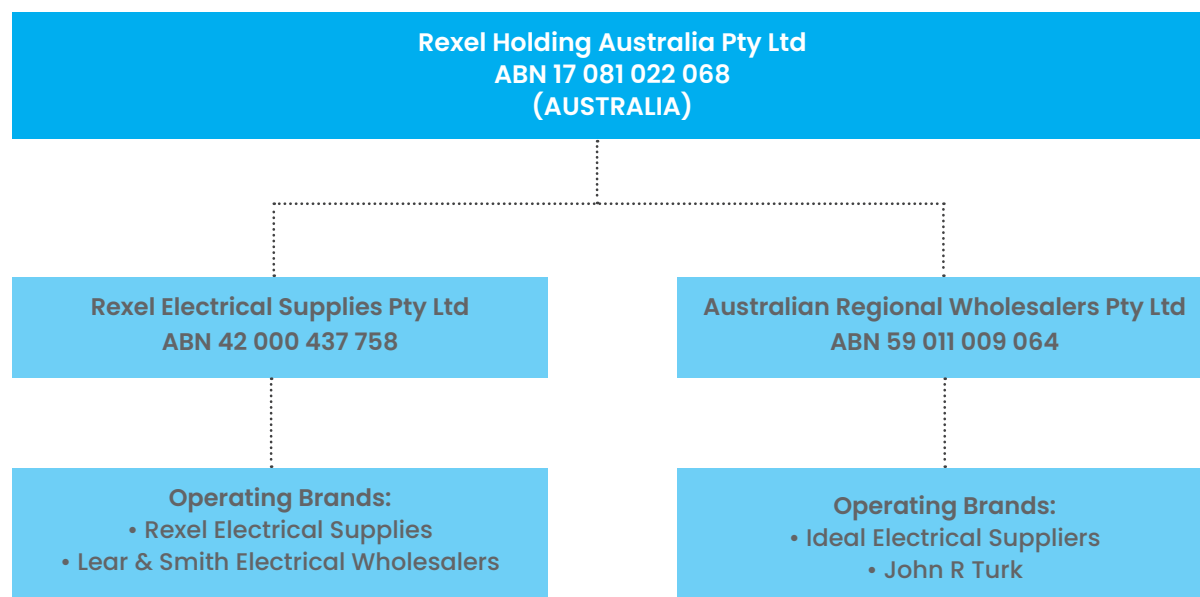
Rexel Australia's leadership team has approved this Statement prior to its submission and approval by the relevant company board. The directors of each of the three entities mentioned above have endorsed this joint Modern Slavery Statement.

02 Our Structure, Operations and Supply Chain

Who We Are

Rexel Australia is an electrical distributor that provides professional electrical products, including cable, lighting, switchgear and photovoltaic power systems to electrical contractors as well as commercial, industrial, and government organisations. Our subsidiaries, Rexel Electrical Supplies Pty Ltd and Australian Regional Wholesalers Pty Ltd, are our trading entities.

Our current corporate structure is:



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.



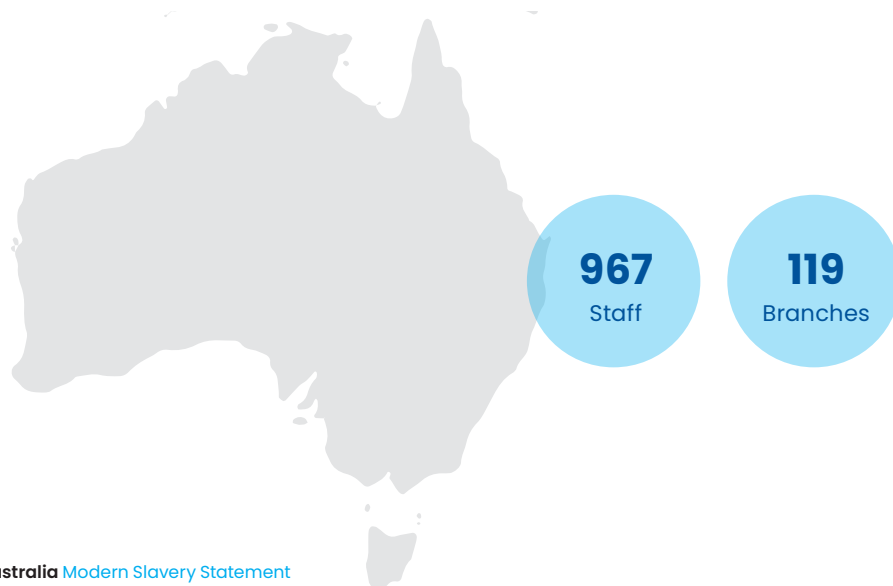
Our Operations

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

For the year ending on 31 December 2025, our estimated annual revenue was approximately \$965 million. Our operations extended across 122 locations, comprising 119 branches, 2 distribution centres (1 in New South Wales and 1 in Queensland), and a national support office based in North Ryde.

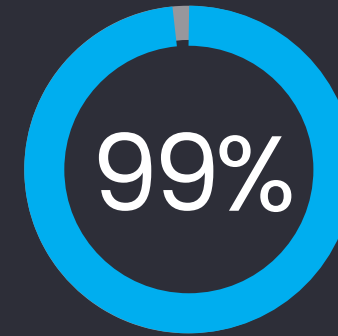
Our Employees

As of 31 December 2025, Rexel Australia employed 967 people across its operations, with 948 of its staff in permanent roles (either full-time or part-time). All employees are located within Australia.



Our Supply Chain

In 2025, about \$868 million was spent across our network of more than 4600 suppliers. Approximately 99.9% of this spending went to Australian businesses, though we are conscious that many products bought locally still come from or are made overseas.



99% of our core suppliers are operating in Australia

Our suppliers are allocated across 4 main categories:

Global market leading manufacturers

These are well-known brands around the world, with factories both here and internationally, often working with multiple Rexel companies across the globe.

Local suppliers

This group covers suppliers based in Australia, some of whom make their products here, while others manufacture overseas.

Resale of Bizline products

Bizline is part of the Rexel Group and you'll only find it sold through Rexel branches, including those in Australia.

Non-inventory suppliers and sub-contractors

This includes a range of Australian service providers offering things like leasing, utilities, waste management, cleaning, security, office supplies, and IT support.

SUPPLIERS

03 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 upholds labour standards and human rights through comprehensive human resources policies and recruitment practices. Employees are engaged directly, with employment terms and conditions clearly articulated in contracts governed by Australian employment legislation and applicable awards. All recruitment activities are administered by a centralised function, ensuring Right to Work checks are completed prior to any offer being extended.

Employee remuneration is assessed annually. Furthermore, all permanent staff are invited to participate in a global engagement survey at least once each year, supplementing both internal and external grievance reporting channels available within Australia.

Temporary labour usage is restricted to very limited circumstances. To mitigate modern slavery risks, temporary appointments are facilitated through a select group of reputable labour hire agencies whenever feasible. Where licensing regimes exist, only licensed providers are utilised.

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.

Our current Risk Mapping working model was prepared by Fair Supply in 2024, using their Integrated Assessment Engine. Fair Supply's global Multi-Regional Input Output (**MRIO**) table links supply chain data from 38,000 industry and country sector combinations. Our plan is to revisit this risk mapping in 2028, or earlier if we feel there is a shift in risk identified in our internal risk assessment.



Based on our risk mapping process, the highest risks of modern slavery in our supply chain can be summarised as follows:



Solar Panels and home batteries

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 7% of Rexel's total sales, which is an increase on 2024 and a trend we expect to continue in 2026. We commenced an on-site audit program in collaboration with our global parent in 2023. To date, we have audited 6 suppliers, including 1 in 2025. With regard to batteries, 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 2025, we issued SAQs to our top 5 battery suppliers by volume, which shows us that those suppliers are aware of their obligations and requirements to have controls related to Modern Slavery. Moving forward, as we expect to see sales continue to grow in 2026, we will be aiming to consolidate our solar and battery procurement to a limited number of select preferred suppliers.



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. Our risk mapping tells us Modern slavery risks are prevalent within the supply chains of these products, especially in the sourcing of raw materials from high-risk regions. We set out to reassess this risk by issuing SAQs from our top 5 suppliers in 2025 which indicate these large global businesses have taken steps to minimise risk of harm in their supply chain.





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. We source our uniforms from a single indigenous-owned Australian business, and we believe that centralising this supply minimises the risk of harm while increasing our influence on the supply chain of this supplier.



Cleaning Services/Security

Although our risk mapping exercise did not identify this, 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. In 2025 we issued SAQs to our top providers by spend and did not find any material risk of harm in those suppliers. While we have considered centralising this supply chain, we have found that the geographical spread of our business makes this a difficult proposition and where appropriate we use local providers from regions in which our branches are located.



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.



04 Our Modern Slavery Risk Management Framework

Control Framework

Rexel's approach to managing modern slavery risk is underpinned by a structured control framework, which continues to be refined and strengthened over time. These controls are designed to be scalable and proportionate, with enhanced measures applied in higher-risk areas.

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 2025, Rexel's Sustainability Supplier Charter has been signed by 165 of our top suppliers by spend.



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	Our main supplier agreement template demonstrates our commitment against modern slavery and promotes ethical sourcing. Principal suppliers are required to provide a separate declaration confirming that they have read and will adhere to the Sustainable Supplier Charter. About 50% of our spend is with our Principal Suppliers who trade pursuant to our main supplier agreement.
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.
Procurement control: Third Party Due Diligence	Rexel Australia utilises a third-party due diligence tool as part of the Rexel Group's global sanctions compliance framework, helping to prevent any association with sanctioned individuals or organisations. This tool gathers data on prospective customers and suppliers, including details about regulatory actions and modern slavery discoveries. If negative information surfaces, our compliance team evaluates it according to Rexel's third-party due diligence policy, modern slavery policy, and the Sustainable Supplier Charter before deciding whether to proceed. The tool has been operational for 3 years and currently oversees continuous monitoring of approximately 827 suppliers in Australia, and approximately 6,000 globally. We use this tool to distribute supplier assessment questionnaires, integrating responses with the tool's data.



Operational control: Recruitment and employee engagement	Rexel Australia upholds labour standards and human rights through comprehensive human resources policies and recruitment protocols. The majority of employees are hired directly under contracts compliant with Australian employment legislation and applicable awards. Recruitment processes are centralised to ensure thorough completion of Right to Work verifications before offers are extended. Annual salary reviews take place, and permanent staff participate in a global engagement survey each year, supplementing established grievance procedures.
Operational control: Recruitment and Training and awareness	Rexel's training platform supports ongoing learning on subjects such as governance principles, Modern Slavery, Employee Rights, Environmental Management, and the Whistleblower Policy. 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. Our Modern Slavery Training forms part of our mandatory training for new starters.
Procurement control: Rexel other suppliers	All other suppliers, including those entering ad-hoc agreements with Rexel Australia, are obligated to comply with both national and international legislation, specifically anti-bribery and anti-corruption statutes. Additionally, suppliers must implement proactive measures to prevent modern slavery, fully observe all applicable modern slavery laws, and conduct their operations in alignment with the principles established by international human rights agreements and the Sustainable Supplier Charter.

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.

05 Actions Taken in 2025

Rexel strengthened its risk-based approach through increased supplier assessments, improved contracts, targeted supplier engagement, and workforce training. These measures advanced operational risk management to better identify and address modern slavery risks.

GOAL 1: Expand Supplier Engagement

Objective:

Work with at least 1 small to medium supplier to assess effectiveness of the supplier assessment questionnaire and better understand their supply chain risks.

Actions & Outcomes:

In FY2025, Rexel reached out to its SME uniform supplier to evaluate and tailor engagement questionnaires. This exercise remains ongoing in 2026, however one insight we have gained is that a simplified questionnaire as part of our supplier onboarding process service providers will give us insight into local risk of harm to people by understanding the makeup of the service provider's workforce, which is likely the most relevant and can be obtained without an SAQ or with a simplified SAQ. This process has also highlighted the administrative burden that can be placed on a small business partner in complying with our modern slavery risk mitigation requirements, indicating that we need to assist in streamlining the process to increase participation rates.

Goal 2: Expand Supplier Questionnaire rollout

Objective:

To reach at least 50% of Stock Suppliers by expenditure (including remaining Solar Suppliers) and to conduct Supplier Assessment Questionnaires to our top 5 IT and top 5 Cleaning Suppliers.

Actions & Outcomes:

We were able to reach these objectives and catch up on our Solar Suppliers not reached in 2024. We have learned that medium to large suppliers and providers (turnover above \$100 million per annum) have kept pace with the industry in modern slavery initiatives and have upstream contractual obligations mirroring these initiatives. They also have systems and procedures in place to ensure compliance with local employment laws and whistleblowing policies. For SME suppliers, we have found that entities under the reporting threshold report conducting risk assessments for modern slavery, but may not have formal processes in place. Additionally, these entities all report procedures and practices in line with Australian employment law. We also obtained insights into the viability of centralising cleaning suppliers, namely that the remoteness of some of our branches requires the use of sole trader/small business providers, which carries a need to simplify our SAQ process to increase the return rate. We intend to continue this work in the future on developing this process, as well as conducting SAQs on our existing suppliers in 2-3 year cycles.

Goal 3: Boost Internal Capability

Objective:

To empower employees and strengthen internal processes regarding modern slavery risk prevention through the increased rollout of our modern slavery training, including 70% of senior leaders in the business.

Actions & Outcomes:

We were able to reach 50 our target of senior leaders in the business, and additionally we had a total of with 440 staff completing the new training module for the first time in 2025. In total, over 700 current staff have completed at least one version of our modern slavery training, approximately 73%.

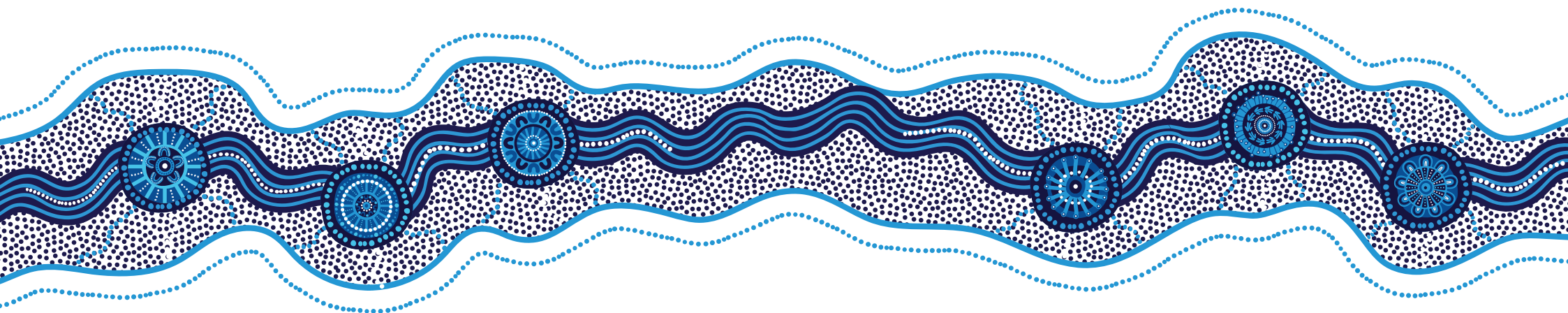
Assessing Effectiveness in 2025

Rexel continues to shift toward evaluating effectiveness through process maturity, focusing on governance strength, decision-making consistency and escalation pathways rather than outputs alone.

Rexel considers that maturity is demonstrated not just by outcomes, but by the organisation's readiness to identify and respond to modern slavery risk.

No Reports in 2025

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.



06 Future Planning

Our Journey since 2020

Since the commencement of mandatory reporting in 2020, Rexel Australia has published five Modern Slavery Statements, reflecting a clear progression in the maturity of its approach to modern slavery risk management, from the initial evolution of our modern slavery risk mitigation program, to expanding through the setting of measurable and achievable goals, and most recently in 2024 and 2025, transition to risk based maturity, focussing on refining and implementing processes, work we intend to continue in 2026 and beyond.

Key learnings

Across the five reporting periods, Rexel has identified that:

- Modern slavery risk requires targeted, risk-based prioritisation, rather than broad coverage
- Supplier questionnaires are most effective when supported by direct engagement and follow-up
- Volume-based metrics are not a reliable indicator of effectiveness
- Internal decision-making and escalation processes are critical to managing risk
- Higher-risk categories, particularly renewable energy supply chains, require deeper oversight and stronger controls

These insights underpin Rexel's transition from a compliance-driven model to a more mature, operationally embedded approach.

Future focus (FY2026 and beyond)

Over the next 3 years, Rexel will continue to evolve its approach with a focus on process maturity, risk-based decision-making and targeted supplier engagement.

Embedding risk-based decision-making

Rexel will formalise decision-making frameworks within procurement to ensure modern slavery risks are consistently assessed, prioritised and escalated, supported by clear guidance and defined escalation pathways. We will measure improvement in this area by implementing checks in the supplier and service provider onboarding process, with a target by the end of 2027 to develop and implement a short checklist for SME providers in the supplier onboarding procedure.

Solar Home Batteries

Australia is on a path to electrification, and we feel that we have the capability to facilitate this shift. However, we recognise (much like our previous learnings regarding solar panels) that this exciting future carries an increased risk of harm to humans in its supply chain. We intend to apply and adapt our learnings from our Solar Panel suppliers, and in 2026 will begin on this work by expanding our SAQs conducted of these battery suppliers to at least 30% of our total spending in 2026.

Building practical capability

Rexel will continue to develop internal capability, shifting from training completion metrics toward practical application of modern slavery considerations in procurement and supplier management decisions. Our target, through expanding compliance with training in the network and through our mandated induction training on modern slavery, is to reach 80% completion of the training modules amongst staff by the end of 2026.

Continuous improvement

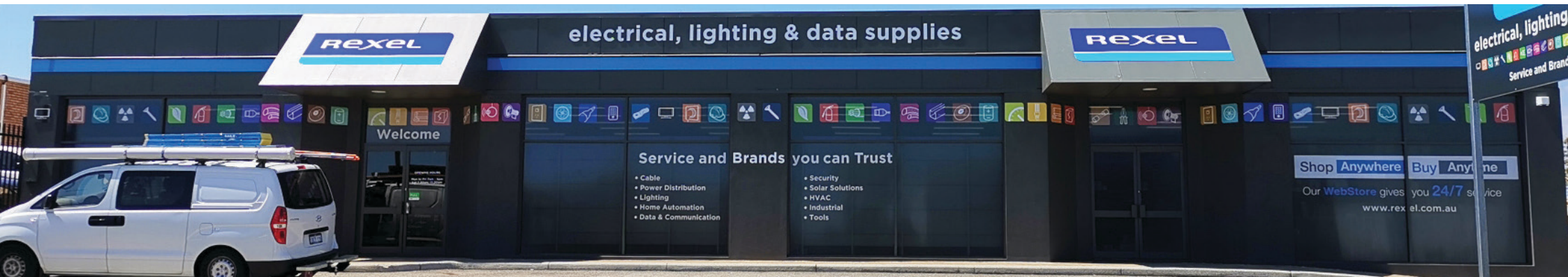
Rexel will maintain an ongoing cycle of review and refinement to ensure its approach remains responsive to emerging risks, supply chain changes and evolving regulatory expectations.

Rexel will refine governance frameworks to ensure risks are clearly owned, consistently assessed and appropriately escalated, with greater integration into broader risk management processes.

The first measurable step in this process will be to review and update the Modern Slavery Policy, Whistleblower Policy and Modern Slavery Remediation Plan in Q4 2026.

Rexel recognises that modern slavery risk cannot be fully eliminated and remains inherently complex and often hidden within global supply chains. Accordingly, effectiveness is increasingly measured not by the absence of identified issues, but by the strength of the systems, governance and decision-making frameworks in place to identify, assess and respond to risk.

Rexel's focus over the coming years will be on building a resilient, risk-based and operationally embedded approach to modern slavery risk management.



Statement Approval

This Statement has been reviewed and approved by the Board of Rexel Holdings Australia Pty Ltd on 26 June 2026 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*.



Benjamin McIntosh
CEO - Rexel Australia & the Pacific

