Modern Slavery Act Transparency Statement

(for financial year ended 31 December 2023)

Rubix Limited

Slavery and Human Trafficking

Rubix Limited and its subsidiaries detailed in its Annual Report and Financial Statements for the financial year ended 31 December 2023 (including, but not limited to, Rubix Group International Limited, Rubix U.K. Limited, The Deritend Group Limited, West Country Tool Company Limited, Matrix Tooling Services Limited, Matara UK Limited, Hydra Engineering Services Limited, Knowlton and Newman Limited, K.J.N Automation Limited Gapp Automation Limited, Compcare Compressed Air Limited and Peter Campbell (Sales) Limited) (together, **"Rubix"**) does not condone and will not participate in any form of human exploitation, including child or forced labour, slavery and / or people trafficking. Rubix is aware of the provisions of the Modern Slavery Act 2015 (the "**Act**") and this statement sets out the steps that Rubix takes to address the risk that slavery and human trafficking might be taking place in its supply chain or within Rubix's business.

Our Business & Supply Chain

Rubix is the leading pan-European value-added distributor of high-quality industrial maintenance, repair and overhaul (MRO) products and services operating across 22 countries. We have established ourselves as a multi-specialist omni-channel provider of products and services, with a commitment to excellence in distribution and technical expertise. With a turnover of €3.2 billion in 2023, we are Europe's largest MRO distributor and with under 3% market share are a natural industry consolidator.

We serve approximately 220,000 customers across the manufacturing sector, leveraging our pan-European network and delivering 24/7/365 locally across Europe. Key local market brands within the Rubix group include Brammer, BT Brammer, Buck & Hickman, Giner, Julsa, Matrix, Minetti, Montalpina, Novotech, Orexad, Robod, Syresa, Schäfer, C. Plüss, Canellas Proteccio, Fluidmec, Lerbs, Motronic, Stop-Fluid, Magema, Solyro, Technidis Peter Campbell Sales, Desarrollos, Zitec, Matara, Knowlton & Newman, Deritend, KJN Aluminium Profile and WCT. Rubix is the authorised distributor of many of the world's leading engineering component manufacturers and we offer over 2 million individual products to our customers.

We are committed to delivering sustainable long-term value for our customers, employees, investors and other stakeholders. As part of this commitment to sustainability, all our operations across the UK and Europe adhere strictly to all local regulations. We do not condone and will not participate in any form of human exploitation, including child or forced labour, slavery or people trafficking. Rubix is committed to ensuring that slavery, forced or child labour or human trafficking does not occur in its business or supply chain. As such, Rubix requires its suppliers to conduct employee relations in an ethical manner and in compliance with requirements stipulated by both international and local laws and industry standards.

Our Policies

We are committed to ensuring that slavery and human trafficking does not take place in our supply chain or our own operations, and we have rigorous management-approved policies and processes in place to help deliver our commitment. Many of Rubix's existing policies contain specific elements relating to slavery and human trafficking, including the following:

- The **Group Code of Conduct and Ethics**, applicable to all affiliates, sets out Rubix's expectation that all employees should behave in an ethical and law-abiding manner. This Code states: "Rubix is committed to respecting and promoting internationally recognised human rights, as set out in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's (ILO) eight core conventions, and the ILO Declaration on Fundamental Principles and Rights at Work. Rubix also expects suppliers to adhere to the same standards in human rights protection, as described in our Supplier Code of Conduct. Where our Codes and local requirements are not aligned, we aim to enforce the most stringent approach".

- Our **Dignity at Work Policy** sets out Rubix's ethos that each Rubix employee has a right to work in a safe and supportive environment. Rubix recognises and respects the legal and moral rights of all persons affected by its operations and is committed to providing a working environment free of harassment, discrimination or prejudice. It reaffirms our strong belief in the benefits of non-discrimination and equality of opportunity. We do not discriminate (or permit discrimination) against staff, visitors, customers, job applicants, suppliers, former staff members and other third parties on any basis.

- Our **Whistleblowing Policy** commits to the highest standards of openness, probity and accountability. Rubix has an independent whistleblowing hotline hosted by a third party, SafeCall. This allows employees and any other parties working on behalf of, or in connection with, Rubix to voice compliance related concerns to help Rubix prevent and detect serious malpractice or wrongdoing, particularly in relation to corruption, harassment, and abuse of power. All employees are encouraged to use this to report serious concerns regarding matters in the workplace.

- Our **recruitment standards** require pre-employment checks to be made in line with all applicable local legislation on all new employees, including candidates' eligibility to work. Recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. We take steps to ensure that its vacancies are advertised to a diverse labour market.

- The Rubix **Supplier Code of Conduct** sets out our expectation that suppliers meet the high ethical standards that are consistent with Rubix's corporate beliefs and values, and the majority of our core Group suppliers meet or exceed this expectation. We expect all our suppliers (and their subcontractors) to operate their businesses and conduct employee relations in an ethical manner and to meet the requirements stipulated by both international and regional laws and industry standards. As such, we expect our suppliers to have policies in place to prevent illegal or forced labour or child labour; and to comply with all local regulations governing maximum work hours, minimum wages and dismissal procedures.

Risk Assessment and Due Diligence

The risk of slavery and human trafficking within Rubix's organisation is considered to be substantially mitigated through the implementation of the above policies. In addition, Rubix seeks to identify and minimise the risk of slavery and human trafficking in its supply chain by endeavouring to select suppliers who adopt high ethical standards that are consistent with Rubix's corporate beliefs and values and seeks to build long standing relationships with these suppliers. These standards include respecting the rights of the individuals who are employed by them. The majority of Rubix's products are sourced from leading global manufacturers within Europe who adopt and monitor adherence with the high standards that we expect of them.

Training and Effectiveness

Since its launch in 2019, a large and growing number of the Group's employees have access to Rubix Academy, a comprehensive digital learning platform with both mandatory and discretionary learning modules in multiple languages. Rubix Academy contains a module on Modern Slavery Awareness, which is currently open as optional content to all learners.

Every year, Rubix carries out a group-wide employee survey to obtain feedback for management and to identify areas to focus on to increase employee engagement and learning. The 2023 survey highlighted another year of improvement in our Engagement Index which now stands at 73%, above the European benchmark of 60%. This score reflects the Group's ongoing efforts to ensure employees understand the strategy and their role in delivering it, while providing the training required for career development and a working environment that enables them to thrive. High-frequency, high-visibility communications from the Group's senior management team helped to drive motivation and engagement. This is supported by excellent communications from line managers, including monthly Team Time sessions, where they facilitate discussions about the most important topics for our customers and our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is subject to an annual review.

Approved by the Board of Directors of Rubix Limited

26 June 2024

Katherine Phillips, Director, for and on behalf of Rubix Limited