

# FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR

## REPORT

### REXEL CANADA

FINANCIAL YEAR ENDING : DECEMBER 31, 2024



## INTRODUCTION

At Rexel Canada Electrical Inc. ("Rexel Canada"), we are committed to eliminating all forms of forced labour and child labour and we will not tolerate any of these practices in our business or in our supply chain. At the date of publication, we have not received any notification of forced labour and child labour occurring either within our business or supply chains.

This statement outlines some of the controls, policies and practices existing during Financial Year 2024 to prevent forced labour and child labour occurring both within our organisation and our supply chain.

This statement has been published in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (Commonly known as *Forced Labour and Child Labour Act*) and sets out the steps taken by Rexel Canada Electrical Inc., to prevent forced labour and child labour in our business and supply chain for the financial year ending 31 December 2024.

## OUR BUSINESS

Rexel Canada is a market leader in the professional distribution of products and services for the energy world. We are an electrical wholesaler with c. 200 branches and c. 2,100 employees spread across Canada, supporting professionals in a range of sectors including, residential, non-residential and industrial markets. As a business, the safety of our employees is of paramount importance and to that end one of our goals is to be the best and safest place to work.

Rexel Canada trades as Nedco, Westburne, Rexel Utility and Rexel Atlantic. All trading is supported and overseen by Rexel Canada Finance, Commercial, HR and Legal departments.

## ORGANISATION'S STRUCTURE

We are part of the Rexel Group and our ultimate parent company is Rexel SA which has its head office in Paris, France. Rexel SA is listed on the Eurolist market of the Euronext Paris stock exchange.

The Rexel Group employs more than 27,000 employees across 18 countries and has a network of some 1,950+ branches worldwide. Our 2024 annual group turnover was 19.3 billion Euros.

## REXEL GROUP

**+27,000**

employees

**1,950**

branches worldwide

**17**

countries

**€19.3 billion**

2024 annual group sales

## OUR COMMITMENT

As a Group, we are committed to ensuring that there is no forced Labour and Child Labour forced labour and child labour in our business or in any part of our supply chain. This commitment is enshrined by the Rexel Group's signature of the United Nations, Global Compact in December 2011.

The UN Global Compact initiative brings together companies, governments, professional organisations, and non-governmental organisations and is designed to offer a more social, ecological and ethical notion of globalisation. By signing the Global Compact, the Rexel Group is giving a commitment to comply with and promote the ten key principles of the Global Compact in the areas of human rights, labour, environment and anti-corruption. We have made this commitment as we are keen to contribute to a more socially responsible global economy.

## OUR POLICIES ON FORCED LABOUR AND CHILD LABOUR

We have several policies and procedures in place to support our anti-forced labour commitment. Please see below for an outline of some of these key policies.

### Rexel Group Ethics Guide

As a Group, we stand by the fundamental values that are set out in the Group Ethics Guide. These values embody our identity. Amongst other things, the Guide requires full compliance with the core conventions of the International Labour Organization relating to minimum wages, working hours, protection of the environment and health and safety.

## Sustainable Supplier Charter

The Sustainable Supplier Charter formalises Rexel's expectations towards its suppliers, service providers, contractors and subcontractors in the areas of ethics, human rights, protection of employees' rights, respect of the environment and compliance with applicable laws.

Each Supplier working with Rexel is expected to commit to the principles set out in the Charter; it is the cornerstone of a lasting commercial relationship and will strengthen the relationships of trust established between Rexel and its suppliers.

In the event of non-compliance with the provisions of the Charter, the commercial relationship with the Supplier may be reviewed and corrective measures may be taken.

## Minimum Factory Conditions

Our Minimum Factory Conditions are based on the International Standard SA8000 and outline a minimum set of workers conditions with which we expect our suppliers, and their factories to comply. We reserve the right to terminate any relationship with suppliers who are found to be non-compliant with these conditions.

## Third Party Due Diligence

In FY2021, Rexel Group implemented its Third-Party Due Diligence Policy. Any third party (being a customer, supplier or intermediary) must now be reviewed against the rules of this policy before any trade is permitted. For example, Rexel will not permit any transaction with a third party who buys, sells or operates from a Country which is ranked low on the Transparency International's Corruption Perception Index without first undertaking further compliance and sanction checks which identify any recorded wrongful activity by the Third Party (including linked criminal convictions).

## Whistleblowing

Our whistleblowing policy sets out the internal process to follow for employees to make a disclosure should they observe any misconduct including the mistreatment of our people. If any employee has any misgivings about Rexel's conduct, they are encouraged to speak with their manager, and/or HR department. Suppliers are encouraged to speak with their main contact or their manager in the first instance. If they are not comfortable in doing so, an employee or supplier can contact the Rexel Group's whistleblowing hotline at <https://rexel.com/en/ethical-alert/>.

Rexel Group's whistleblowing system is available to internal and external stakeholders at <https://www.rexel.com/en/ethical-alert/>. Amongst other things, any Human Rights concerns can be reported using this tool and any disclosure made in this way will be reported to and processed by the Rexel Global Ethics Committee.

All reports to the hotline are taken seriously and are fully investigated.

To encourage disclosures, the caller can retain their anonymity should they wish.

You can read our external policies here:

- [Rexel Global Ethics Policy](#)
- [Minimum Factory Conditions](#)
- [Rexel Group Sustainability Supplier Charter](#)

## ACCREDITATIONS

### EcoVadis Gold Award – April 2020.

EcoVadis scorecards provide detailed insight into environmental, social and ethical risks across 200 purchasing categories and 160 countries. The Rexel Group has been independently assessed by EcoVadis and has been accredited with Gold Standard certification, scoring within the top 5% of companies assessed globally and the top 1% within our sector.

### Customer Confidence

Rexel Canada is in good standing and is certified with various governance sites in Canada which help manage compliance certification in the supply chain, specifically with compliance checks of suppliers, sub-contractors, and workforces and worksites. Rexel Canada is subject to regular compliance checks to verify information and assess areas of compliance within health and safety, environment and sustainability, quality, Corporate Social Responsibility, business continuity, ethics, including forced and child labour, and more. Rexel Canada regularly successfully passes these compliance questionnaires and has never failed to pass a supplier certification.

Rexel Canada is registered with the following sites: CanQual, Complyworks, ISN, Avetta and Contractor Check. These are sites which our customers have chosen to manage their approval processes. Rexel Canada registers with these sites to receive online questionnaires and upload documentation, which the sites manage and store on behalf of Rexel Canada's customers. These sites certify Rexel Canada as a trusted vendor. Rexel Canada is also CoR certified (Certificate of Recognition) from the CFCSA in Western Canada and is also ISO certified.



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## PROCESSES FOR PREVENTING FORCED LABOUR OR CHILD LABOUR IN OUR BUSINESS

We are a Canadian employer subject to federal and provincial employment laws and have well developed practices and controls in place to prevent the risk of forced labour and child labour occurring in our business. These practices are under constant review to ensure continuous improvement. The following is a brief summary of our internal processes and controls.

### Permanent Employees

All recruitment for permanent and fixed-term employees is managed through a centralised recruitment function. All applicants are tracked through our online recruitment portal and any new appointment is validated by senior management and the independent Human Resources (HR) department.

All candidates are vetted by the Hiring Manager following guidance from our HR department before they are processed as an employee. HR will ensure that all employment contracts and applicable checks have been properly completed and that the candidate has been met in person to receive ID documents.

Additionally, all payee details are checked by our payroll department to identify any duplicate bank accounts and, as part of the induction checklist, the payroll department is required to verify that the bank details provided are accurate and belong to the employee.

The onboarding process is being digitalised and as part of this workflow, the new employee will be required to read and electronically agree to Rexel's Ethics Guide (see above).

### Temporary Employees

We will occasionally use temporary labour in our operations. Where temporary labour is used, to control any risk of forced labour and child labour, (where possible) we channel temporary appointments through a handful of centrally approved recruitment agencies.

The selected agencies are all highly regarded with good reputations and have implemented robust recruitment processes to help ensure that there is no existence of forced labour and child labour in any temporary/ agency appointments, e.g. through vetting of a candidate's identity, legally required documents, and employment history.

The selection of such agencies is under continuous review.

There is also a centralised process for onboarding and paying indirect suppliers (see below). All recruitment of temporary labour is processed using this system which has reduced the number of suppliers of temporary agency staff and seen an increase to our approved recruitment partners.

### Whistleblowing

Anybody within our business who has a suspicion of forced labour and child labour is encouraged to speak to their manager, and/or HR department. As an alternative, they can contact our whistleblowing hotline (see above).

As a matter of policy, we will support any Whistleblower who raises a genuine concern, even if they turn out to be mistaken.

### Awareness

We are actively working to increase awareness in our Business of the presence of forced labour and child labour in Canada.

An e-learning training module will be available to all Rexel Canada employees via our online academy. This will be a mandatory module which all Rexel Canada employees will be required to complete. The purpose of this module is to make employees aware of the existence of forced labour and child labour in Canada, to help them identify the signs that someone may be a victim of forced labour and child labour, and to advise them of what action should be taken in the event that they identify an individual at risk.





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## OUR SUPPLY CHAINS

We purchase goods and services from predominately North American based suppliers. We have established strong and long-lasting relationships with a mix of global market leading manufacturers and local (Canadian) SMEs.

All suppliers of goods stocked for resale are managed centrally by our Commercial Procurement Department. From time to time, we are asked to procure goods outside of our profiled suppliers; there is a documented approval process for these instances with independent sign off by the applicable Regional Commercial Manager and the Banner Commercial Manager. Suppliers of goods/services not for resale will be increasingly managed centrally by our Finance Department.

The number of strategic suppliers continues to decrease which has strengthened our relationships with our strategic partners and given us greater influence and transparency on their practices.

We do recognise that there is a risk of forced labour and child labour occurring in our supply chain and we are continually working with our partners to implement further checks and balances to mitigate and reduce this risk even further.

## SUPPLIER ADHERENCE TO OUR VALUES

We are committed to ensuring that we only partner with suppliers that respect Rexel Canada's core values and those of the UN Global Compact. We have made and continually strive to make significant improvements to our procurement processes to ensure we select and work with suppliers who meet these standards.

### Supplier Sustainability Charter

In FY2021 Rexel Group launched the Rexel Sustainable Supplier Charter (please see above) and encouraged all of our strategic suppliers to sign this Charter to commit to the same ethical and moral values, standards and goals as Rexel Canada.

We have continued to promote the signing of the Charter in 2024 with our key strategic suppliers with over 80% of our strategic suppliers having signed the Charter in 2024.

### Direct Suppliers/Goods for Resale

We plan to undertake an extensive review of our direct purchasing practices and processes and we plan to implement a new Standard Operating Procedure to ensure that all of Rexel Canada's direct Suppliers and tender activities are managed consistently and fairly, according to best in class practices. The SOP will set out:

- the Procurement functions management of suppliers by supplier classification (e.g. number of review meetings, number of factory visits).
- the type and frequency of tenders per product classification
- the documents, policies and/or accreditations that our suppliers are expected to have or hold per supplier classification.

The SOP shall include template tender documents which shall continue to put Rexel Canada's core values at the essence of the selection criteria. Amongst other things, all tenderers shall complete a due diligence questionnaire which shall include details on the steps they have taken to eradicate any forced labour and child labour in their own business and supply chain.

We will update our standard purchasing agreements to directly include our Supplier Sustainability Charter and Minimum Factory Conditions rather than incorporate by reference. The purpose of this will be to draw our Supplier's attention to the values and importance of these two documents.

Finally, we intend to create a framework for conducting social responsibility audits of our first and second tier supply base utilising support from the Rexel Group's global presence. As part of this process, the supplier completes a self-certification on their practices and policies using Rexel Canada's audit questionnaire. These responses will then be validated at an on-site survey which is also used to assess the supplier's honesty and integrity.



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### EcoVadis

The Rexel Group uses the EcoVadis Corporate Social Responsibility (CSR) monitoring platform to assess a selection of key suppliers. Details of the EcoVadis platform are set out above. Rexel Canada shall use the results of this assessment to benchmark and improve its suppliers CSR practices on an ongoing basis.

Since the beginning of the CSR supplier evaluation process, more than 550 suppliers representing 78% of the Group's direct purchases have received a request to assess their performance in terms of sustainable development.

The evaluation of supplier performance is regularly reviewed. Thus, 261 suppliers representing 58.7% of the Group's direct purchases have an evaluation of less than 2 years ago.

From discussions with the participating suppliers, we understand that larger companies have few problems in completing the assessment. However, for small and medium sized entities it can be onerous. We are therefore reviewing the process to see how we can get more smaller suppliers to participate.

### Indirect Suppliers/Goods Not For Resale (GNFR)

The procurement of goods not for resale (indirect goods) is managed via a Rexel Canada Portal which is overseen by the Finance department.

Each spend category is assigned an owner from the relevant business department who is ultimately accountable for the conduct of suppliers within their category. The portal controls the process of creating new supplier accounts and paying suppliers to ensure total transparency and greater rigour in the process.

Rexel has implemented a process for creating new suppliers for non-trade spend on the Portal. The involvement of the category stakeholder is now compulsory before a new indirect supplier will be created on the Portal. Where the spend with a particular indirect supplier is projected to be between \$5,000 - \$25,000CND, a quote will be required from the prospective suppliers. Where the spend with a particular indirect supplier is projected to be above \$CDN25,000, three quotes and a full tender is required.

All new indirect suppliers (regardless of projected spend) will be required to complete a due diligence questionnaire, which includes details on the steps they have taken to eradicate any forced labour and child labour in their own business and supply chain and sign a contract which will include provisions relating to the eradication of forced labour and child labour.

This activity helps ensure we partner with suppliers who respect Rexel Canada's core values and who have a similar commitment to eradicating forced labour and child labour.

Our tender process puts Rexel Canada's core values at the essence of the criteria. The tender process is multi-staged to allow for greater and more objective scrutiny of any potential supplier. All suppliers must agree to abide by our Supplier Sustainability Charter and Minimum Factory Conditions.

### SOLAR

During FY2022 we became aware of a report published by Sheffield Hallam University which identified the possibility of forced labour in the global solar supply chain. Specifically, the report highlighted that the polysilicon used in the manufacturing of some solar products has been associated with the exploitation of Uyghur and Kazakh minorities in Xinjiang, China.

Since becoming aware of the report, the Rexel Group has implemented global PV guidelines to apply to all solar panel suppliers, irrespective of spend.

Rexel Canada's Executive Management team considered the report and was gravely concerned about the contents which it addressed at senior level with its first-tier supply chain.

Rexel Canada does not have any direct solar suppliers, and, Rexel Canada has not received any direct notice that any of its supply chain is using forced labour or child labour.

Solar suppliers could not work with Rexel Canada unless we have carried out checks and asked the supplier to complete a questionnaire regarding corruption, respect for human right, safety and the environment, enabling us to evaluate such supplier.

### REMEDATION, TRAINING AND ASSESSING EFFECTIVENESS

In FY 2024, we did not identify any instances of forced labour or child labour, or occurrences of the loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. As such, we have not taken measures to remediate these issues during the reporting period.

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Rexel Canada does not currently have any training in place that is directly related to forced labour or child labour and has not yet put in place any measures to assess its effectiveness in ensuring that forced labour and child labour are not being used in its operations or supply chains. Rexel Canada plans to put such training in place in the future and also plans to implement measures to assess its effectiveness in ensuring that forced labour or child labour are not being used in its operations or supply chain.

### FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no forced labour and child labour in our business or supply chains, we intend to take the following steps to further combat forced labour and child labour:

- Initiate the e-learning training module and initiate further activities aimed at maintaining the high completion rate of the e-learning training module which will serve to increase awareness of the risk of forced labour and child labour in our Business.

- Take actions to help ensure that employees at Rexel Canada's Distribution Centres are protected against forced labour and child labour and are made aware of any signs that somebody may be suffering at the hands of an organised criminal gang.
- Review and improve the controls around the approval and onboarding of new non-profiled suppliers.
- Create and distribute an action checklist for HR and Senior Management on how to respond to a notification of a potential instance of forced labour and child labour in our Business.
- Continually review the panel of approved recruitment agencies for temporary workers and implement further governance controls to strengthen the supplier partnership.
- Implement measures to encourage all strategic suppliers to sign Rexel's Sustainable Supplier Charter.
- Further expand the regularity and scope of the social responsibility audits on our first and second-tier supply chain.

This report was approved by the board of directors of Rexel Canada Electrical Inc., as a report of for the fiscal year ended December 31, 2024 in accordance with subparagraph 11(4)(a) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Act").

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed:



Jeffrey Moyle, President & Chief Executive Officer  
Rexel Canada Electrical Inc.  
I have the authority to bind Rexel Canada Electrical Inc.

Date: May 30, 2025

This report is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (commonly known as Forced Labour and Child Labour Act 2023) and constitutes the Forced Labour and Child Labour report for Rexel Canada Electrical Inc. for the financial year ending 31st December 2024.