

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Routeco Group Holdings' (hereinafter referred to as the **"Organisation"** or **"Routeco"**) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and workplace abuse. From this point onwards we will use the expression **"slavery and human trafficking"** to encompass these various forms of coerced labour.

As part of the distribution industry, Routeco recognises that it has a responsibility to take a robust approach to limit any potential slavery and human trafficking. Routeco's commitment to human rights is enshrined within the [Sonepar Human Rights Policy](#) (Routeco is a Sonepar Company) and [Sonepar Code of Conduct](#).

This statement relates to actions and activities undertaken during the 2025 financial year (01/01/2025-31/12/2025) and reiterates Routeco's commitment to Routeco existing standards and perseverance in performing actions and activities aimed at limiting any potential modern slavery and human trafficking risks related to its business, its supply chain and its operations.

Organisational Structure and Core Business

Routeco Group Holdings is a Sonepar Company and the highest parent of the following operative:

- Routeco Ltd (incorporated in the UK);
- Routeco GmbH (incorporated in Austria);
- Routeco BV Netherlands (incorporated in the Netherlands);
- Routeco BV Belgium (incorporated in Belgium); and
- Routeco AG Switzerland (incorporated in Switzerland).

This statement covers the activities of the above-mentioned subsidiaries.

Routeco is one of Europe's leading distributors of industrial automation and control products.

As a distributor, we will source, sell and supply products to our customer base to meet their requirements. The Organisation's product portfolio includes some of the leading brands in manufacturing.

Our Supply Chain

Our supply chain includes the sourcing and distribution of electrical products principally related to control and automation within a manufacturing environment.

Over 70% of our product range are sourced from the US company Rockwell Automation who have a high degree of ethical compliance.

Our suppliers are not based in geographical areas renowned for alleged human rights violations or are in any other ways implicated in alleged human rights violations.

We are strongly committed to conducting our business in a lawful and ethical manner, including engaging with suppliers that are committed to the same principles.

For this reason we require suppliers in our manufacturing supply chain to comply with our [Business Partner Code of Conduct](#) which focuses on some key areas like:

- Compliance with laws,
- Human rights and in particular child labour, human trafficking and forced labour
- Fair and ethical employment practices
- Protection of the Environment as well as Health and Safety of staff, visitors and others who might be involved with business activities
- Compliance with anti-corruption laws
- Fair competition
- International trade compliance in all its aspects
- Cyber Security and Data Protection

Policies and Procedures

Routeco strives to conduct its business honestly and honourably and expects its customers, associates and suppliers to do the same. The Organisation is committed to maintaining the highest degree of integrity in all dealings with potential, current and past customers, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of providing the business services concerned.

Routeco (a Sonepar Company) has a comprehensive Compliance Program which is composed of several policies, procedures and practices designed to assess and address compliance with legal and regulatory requirements, including slavery and human trafficking.

- [Sonepar Code of Conduct](#) together with Internal Compliance Manual makes clear to all employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour also when operating overseas.
- [Sonepar Business Partners Code of Conduct](#) sets out the standards Sonepar requires from its business partners and its expectation on business partners to commit to the same high ethical standards.
- [Sonepar Human Rights Policy](#) outlines Sonepar's requirement to comply with various aspects of human rights.
- [Sonepar Whistleblowing Policy](#) in support of the Compliance Program, we have also established a dedicated whistleblowing platform referred to as the Speak Up Line, administered by a third party organization. It enables all associates and stakeholders to report any suspected violations of our Code of Conduct as well as instances of fraud, theft, corruption, violations of law, or threats to Sonepar/Routeco's business integrity, including

violations or potential violations that may relate to human rights. This platform is available 24/7 over the phone, by email and through [Sonepar Alert Platform](#) open to all, confidential and secure.

Routecco encourages all its workers, customers, and other business partners to report any concerns related to its direct activities, or its supply chain's activities in accordance with [Sonepar Whistleblowing Policy](#).

Due Diligence and Risk Assessment

Routecco undertakes careful due diligence when considering taking on new business partners, and thereafter, monitors and annually reviews risks related to its business partners.

This is done by:

- broadly mapping the supply chain in order to assess particular products or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks associated to each new supplier
- reviewing on a regular basis all aspects and risks associated to the supply chain
- continuously monitoring our business partners through reputable compliance databases
- conducting supplier audits

If necessary, the Organisation would invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, which may result in the termination of the business relationship.

The Customer Service and Purchasing team, with the support of the Compliance Team, are responsible for investigations and conduct due diligence in relation to any known supply chain with compliance issues including any suspected instances of slavery and human trafficking.

Recruitment and Selection Policy

The Routecco HR Manager is responsible for putting in place and reviewing the Company's People policies and processes.

Routecco's employment practices are fair, ethical, compliant with current legislation and reflecting best business practice.

The purpose of the Recruitment and Selection Process is to assist the organisation in finding the best and most talented individuals to fill its vacancies in a timely and efficient manner. This process sets out the rationale for recruitment and selection at Routecco, illustrating how resourcing is managed fairly and consistently throughout the business, ensuring that these practices are lawful, balanced, and impartial.

Temporary staff are recruited based on their skills, qualifications, experience, potential and motivation, regardless of gender, race, ethnic origin, sexuality, religion, marital status, age or disability. Only specified and reputable employment agencies are used to source labour.

Dignity at Work Policy

Routecco is committed to providing a working environment that ensures that all employees are treated fairly, equally and decently. We believe that everyone has the right to be treated with dignity and respect.

Harassment or bullying can cause fear, stress, anxiety and it can, therefore, affect job satisfaction and an individual's morale. We regard any form of harassment and bullying as totally unacceptable behaviour and we will not permit or condone it in any form.

Everyone has a personal responsibility for their own behaviour and a duty of care to treat each other with dignity and respect. This includes individuals being aware of the appropriateness of their conduct, making sure that their own behaviour does not cause offence or misunderstanding. Furthermore, we encourage any employee who witnesses a conduct contravening the Dignity at Work policy to report it to their manager or via the Whistleblowing platform

Training

All Sonepar and Routecco policies are made available to all staff through the Routecco intranet. As part of the induction programme, new employees are required to familiarise themselves with the policies relevant to their role.

Routecco requires staff directly involved with Governance, Risk & Compliance, Finance, Procurement, Sales and Human Resources to complete more in-depth training in the relevant subject area's dependent on their job role and read this statement. All directors have been briefed on the subject.

Performance Indicators

Sonepar runs a robust internal control and assessment system annually. This system covers an extensive range of operating rules and processes. The internal control framework evaluates the effectiveness and implementation of Sonepar policies and procedures throughout the company, including those related to human rights. The assessment includes testing compliance, identifying gaps, and defining corrective actions. Findings from the internal control programme are reviewed at senior level to ensure continuous improvement in our risk-management and compliance practices

Board Approval

This statement has been approved by the organisation's board of directors, who will review and update it annually. This statement will be published on Routecco's website.



Dave Amps
Managing Director
Routecco Group
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