

Please note this policy applies to all subsidiary companies including Rubix UK and/or Matrix Tooling and/or Compcare Compressed Air Ltd and/or KJN Automation Ltd and/or Knowlton and Newman Limited and/or Matara UK Ltd, and/or Deritend Group Ltd and/or West Country Tool Company Ltd and/or Gapp Automation Limited, and/or Peter Campbell Sales Ltd and/or Rubix Industrial Solutions Ireland Ltd and/or Rubix Industrial Solutions Ireland Ltd. Herein referred to as Rubix

Slavery and Human Trafficking

Rubix does not condone and will not participate in any form of human exploitation, including child or forced labour, slavery and people trafficking. Rubix is aware of the provisions of the Modern Slavery Act 2015 and this policy sets out the steps that Rubix UK and its subsidiaries have taken to try and remove the risk that slavery and human trafficking is taking place in any of its supply chains or as part of the Rubix Group's business.

Our Business

Rubix is a leading pan-European added value distributor of high-quality industrial maintenance, repair, and overhaul products. We supply Bearings, Mechanical Power Transmission components, Fluid Power, and Tools and General Maintenance products, together with engineering and associated industrial services, to the maintenance repair and overhaul ("MRO") market across Europe.

Rubix Group is UK headquartered, with the UK being our biggest operation, with our European geographic footprint now covering 23 countries and serving over 100,000 customers in every manufacturing sector, leveraging our pan-European network and delivering 24/7/365 locally across Europe from our 16 national distribution centres.

Supply Chain

Rubix is the authorised distributor of many of the world's leading engineering component manufacturers. As an industrial supply distributor, we offer around 6 million individual product lines, manufactured by thousands of companies.

Our Policies

The Rubix part of Rubix Group is committed to ensuring that slavery and human trafficking is not taking place in any of its supply chains or as part of the company's business. Many of Rubix of Rubix Group's existing policies contain relevant elements which seek to ensure that this is the case. Including:

- Labour practices policy, which sets out the Rubix UK's ethos that *"each and every Rubix UK's employee has a right to work in a safe and supportive environment"*. Rubix UK recognises and respects the legal and moral rights of all persons affected by its operations and are committed to providing a working environment free of harassment, discrimination, or prejudice.
- Dignity at work policy, which sets out Rubix UK's strong belief in the benefits of non-discrimination and equality of opportunity and supports employee engagement and representation.
- Whistleblowing policy, under which Rubix commits to the highest standards of openness, probity, and accountability.
- Supplier Code of Conduct and Sustainable Procurement Policy, which sets forth a number of actions where Rubix UK can use its purchasing power to help ensure ethical and sustainable procurement.

- Fair business practice policy, where we ask that all employees demonstrate the highest possible levels of integrity, and act honestly and fairly when dealing with other employees and external stakeholders and set out our expectation that all employees will act ethically, and, in a manner, which is consistent with their training.

Risk Assessment and Due Diligence

The risk of slavery and human trafficking within Rubix's organisation is substantially diminished by the implementation of the above-mentioned policies and the procedures that Rubix UK's has in place across its operations.

Rubix UK 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 which 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.

As such, Rubix expects its 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. The majority of Rubix's products are sourced from leading manufacturers within Europe who adopt high standards which are consistent with Rubix Group.

Rubix UK expects its suppliers to have in place policies that enable Rubix UK to be reasonably assured that they meet the standards expected of them. If suppliers fail to meet these expected standards, Rubix UK may suspend its relationship with that supplier until the issue is resolved.

Training and effectiveness

Rubix UK has briefed its purchasing team on the risks of modern slavery and human trafficking and agency worker providers have been reviewed in order to ensure that they are reputable and will comply with the Modern Slavery Act.

The Group carries out an employee survey every year to obtain feedback for management and to identify areas to focus upon to increase employee engagement still further. The group also regularly monitors training costs per employee to assess the efficiency of its employees through training in order to ensure the quality of its overall service delivery.

In addition to the Whistleblowing Policy, Rubix UK is in the process of assessing service providers for the introduction of a whistleblowing hotline so that unethical behaviour can be reported even more effectively. Should any concerns be held in relation to unethical behaviour, they can be raised in confidence via this hotline and will be subject to immediate investigation.

We do not have any key performance indicators in place in relation to compliance with this policy; however, any breaches of this policy should be reported to Rubix UK.

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



Vince McGurk
CEO Rubix UK, Ireland & Iceland
16 January 2026