

# Modern Slavery and Human Trafficking Statement 2023

## Introduction

This statement sets out Routeco Group Holdings' (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.

This statement relates to actions and activities undertaken during the financial year 2023 (01/01/2023-31/12/2023) and reiterates Routeco's commitment to human rights and its perseverance in performing actions and activities aimed at reducing any potential modern slavery and human trafficking risks related to its business, its supply chain and its operations.

As part of the distribution industry, the Organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Our [Code of Conduct](#) reflects our commitment to acting ethically and with integrity in all our business relationships.

## 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) and Routeco BV Belgium (incorporated in Belgium) and Swibox Automation AG (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 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.

The Company's Group has an annual turnover in excess of £140 m.

## Code of Conduct

Routeco always conducts services honestly and honourably and expects its clients 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's commitment is formalised in the above-mentioned Code of Conduct.

We extend the same standards to all customers, suppliers and associates.

Our actions and advice will always

- conform to relevant law;
- avoid causing any adverse effect on ethical trade or the human rights of people in our own organisation, the organisations we deal with, the local and wider environments, and the wellbeing of society at large.

All activities are conducted professionally and with integrity, taking great care to be completely objective in the judgment and any recommendations given, so that issues are never influenced by anything other than the best and proper interests of our customers.

We always strive to be fair and objective in advice given and actions, decisions, and recommendations, are not influenced by gender, race, creed, colour, age or personal disability.

The quality system BS EN ISO9001:2015 is under constant review and audit to ensure continual improvement. It is the belief of the Group Managing Director that the achievement of our quality objectives will demonstrate our commitment to providing excellent service, ensuring customer needs and expectations are being continually met and where practical exceeded in line with the Code of Conduct.

## **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](#) recognised by an independent body.

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 [Supplier 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
- Personal Data Protection

## **Recruitment and Selection Policy**

The group HR Director is responsible for putting in place and reviewing the Company's People policies.

Routeco's employment practises are fair, compliant with current legislation and reflecting best business practise.

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

Temporary staff is 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

Routeco 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

## Due Diligence

The group Operations Director is responsible for putting in place and reviewing the Company's Supply Chain policies.

The Organisation undertakes due diligence when considering taking on new suppliers, and thereafter, monitors and annually reviews risks related to its suppliers..

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 suppliers through reputable compliance databases
- conducting supplier audits

If necessary, the Company 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.

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

## Training

All staff have access to our People and Supply Chain policies via our intranet site. New employees are requested to read information relating to these policies as part of the induction process. Customer Service and Purchasing personnel will receive more in-depth training in the relevant subject area's dependant on their job role. All directors have been briefed on the subject.

## Whistleblowing Platform

Routeco encourages all its workers, customers and other business partners to report any concerns related to its direct activities, or its supply chain's activities. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for associates as well as any member of the public to make disclosures, without fear of retaliation.

If you believe or suspect that a breach of this statement has occurred/may occur, you should notify your manager or report in accordance with the Company's [Whistleblowing Policy](#) as soon as possible.

## **Performance Indicators**

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015 and has put in place the following measures:

- Require all staff working in Purchasing and HR professionals to have read this document.
- Maintain the system for supply chain verification, whereby the Company will evaluate potential suppliers before they enter the supply chain; and
- Review its existing supply chains, whereby the Company will evaluate all existing suppliers.

## **Board Approval**

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



Dave Amps  
Managing Director  
Routecco Holdings