

ANIXTER LIMITED

Modern Slavery Statement for the Financial Year 2022

The statement below covers Anixter Limited (Wesco Anixter) and its wholly owned subsidiaries, Anixter Pension Trustees Limited, Anixter Middle East FZE, Anixter Distribution Ireland Limited, Anixter Saudi Arabia Limited, HMM Pension Trustees Limited, Infast Group Limited (and its wholly owned subsidiary Haden Drysis S.A.), Anixter (U.K.) Limited, and Anixter Pension Scheme Trustees Limited (together, **Wesco Anixter UK Group**).

This joint statement for the Wesco Anixter UK Group sets out the steps taken during the financial year ended December 31, 2022, to ensure that slavery and human trafficking are not present in our supply chains and our own business.

Section 1 – Organisation structure

The Wesco Anixter UK Group companies are wholly owned subsidiaries of Wesco International Inc., a leading global distributor of communications, network & security solutions, electrical & electronic solutions and utility & broadband solutions. As a global organisation, Wesco International Inc. and its affiliates¹ (Wesco Group) help build, connect and protect applications and environments around the world. We promote responsible commercial practices at every level of our business and are committed to conducting our business ethically, honestly and in a lawful manner. To learn more about our business, visit https://www.anixter.com/en_gb.html.

The Wesco Group conducts its business in four regions, North America, the Caribbean and Latin America, Asia-Pacific and Europe, Middle East and Africa. Our key suppliers are manufacturers and other distributors of communications, network & security solutions, electrical & electronic solutions and utility broadband solutions products. We endeavor to build long-term relationships with many of our suppliers in order to ensure that products in our inventory have been sourced in an ethical and lawful manner.

We also procure products and services from other vendors to run our business, such as IT, security, legal, financial and cleaning services providers, customs brokers, freight forwarders, commission agents and others.

Wesco Group's compliance efforts and activities are managed by the Wesco Ethics and Compliance Office, which is led by the Wesco Group's Chief Ethics and Compliance Officer. The Wesco Ethics and Compliance Office oversees the compliance obligations of Wesco Anixter UK Group, including Wesco Anixter UK Group's efforts to prevent the presence of slavery and human trafficking in our supply chain and our own business.

This statement sets out the steps taken during the financial year ended December 31, 2022, to ensure that slavery and human trafficking is not taking place in our supply chains and our own business.

Section 2 - Our Business and Supply Chains

¹ Anixter Inc. and Wesco International, Inc. were separate listed public entities on the New York Stock Exchange and merged on 22 June 2020. The Wesco Anixter UK Group entities have published modern slavery statements in compliance with the UK Modern Slavery Act 2015. Not all of the entities that are part of the Wesco Group are subject to modern slavery legislation.

Wesco Group conducts its business in four regions, North America, the Caribbean and Latin America, Asia-Pacific and Europe, Middle East and Africa. Our key suppliers are manufacturers and distributors of communications, network & security solutions, electrical & electronic solutions and utility broadband solutions products. We endeavor to build up long-term relationships with many of our suppliers in order to ensure that products in our inventory have been sourced in an ethical and lawful manner.

In addition to product vendors, we also have vendors which help us to run our business, such as IT, security, legal, financial and cleaning services providers, customs brokers, freight forwarders, commission agents, advisors and other service providers.

Section 3 - Policies and Contractual Controls

Wesco Anixter UK Group's commitment to an ethical and socially responsible approach to doing business includes but is not limited to implementing and enforcing global policies such as:

- [Code of Business Conduct](#)
- [Human Rights Principles](#)
- [Anti-bribery and Anticorruption Policy](#)
- [Supplier Code of Conduct](#)
- [Business Partner Compliance Program](#)
- [Conflict Minerals Policy](#)

In addition, suppliers and business partners are held to high ethical standards by our expectation that they abide by our policies.

To support such programs, Wesco Anixter UK Group has teams of internal advisors and experts whose primary focus is on compliance and corporate responsibility, such as internal audit, trade compliance, legal, human resources, environmental, sustainability and health and safety. We will also call on external experts as needed. This support is available to every Wesco Anixter UK Group subsidiary. Using the combination of our programs and the support of internal experts, Wesco Anixter UK Group ensures its commitment to an ethical and socially responsible approach to doing business at all relevant times.

Wesco International Inc. is a participant in the United Nations Global Compact, the world's largest corporate sustainability initiative. Prior to its merger with Wesco, Anixter Inc was also a member of the United Nations Global Compact. All the companies within the Wesco Anixter UK Group have embraced the ten principles of the Global Compact, including principle 4, which prohibits all forms of forced and compulsory labor. You can find our 2022 Corporate Sustainability Report, which describes our actions to continually improve the integration of the Global Compact and its principles into our business [here](#). The report outlines our efforts and commitment to environmental, social and governance sustainability and sets out our human rights overview.

Our internal policies include the [Code of Business Conduct](#), which applies globally and is designed to assist us in complying with the laws and ethical principles that govern our business conduct.

In our standard supplier contracts, we require our suppliers to comply with the [Supplier Code of Conduct](#), which among other things, prohibits forced labor and human trafficking and requires our suppliers to source products only from third parties who uphold similar standards of integrity and ethical compliance as set forth in the Supplier Code of Conduct. Further, in 2022 we reviewed our vendor setup forms to incorporate our Supplier Code of Conduct ensuring that from the onboarding

stage we require compliance with our policies from our supply chain. The new forms will be rolled out in 2023

We also operate a [Business Integrity Line](#), available online or by phone to anyone for the submission of anonymous reports (where permitted by local law) of violations of our policies or the law. The Business Integrity Line is operated by an independent third party and supported by our Global Anti Retaliation Policy that ensures that the whistleblower is appropriately protected.

Section 4 - Risk Assessment and Due Diligence

Business partners that represent a greater compliance risk are required to complete our business partner qualification process. If the business partner fails to satisfactorily complete the qualification process, they will not be paid without the prior approval of a Regional Compliance Officer.

Wesco Anixter UK Group's business partner qualification process includes a due diligence screening of all new or renewing business partners who will be performing services for or acting on our behalf in certain higher-risk countries or categories of service that we identified. High-risk countries are typically identified as (A) any country with a rating of Tier 2 or more in the previous year's Trafficking in Persons Report issued by the Department of State of the United States; or (B) any country with a Corruption Perceptions Index (CPI) score of 40 or less on the previous year's index issued by Transparency International; or (C) recommended for screening by a Regional Compliance Officer. Our internal processes include continuous monitoring of some of our approved business partners who have been identified as higher risk and ongoing improvement of those internal processes to identify risks of modern slavery in our supply chains.

Section 5 - Training

All Wesco Anixter employees receive training and are required to certify that they comply with the Code of Business Conduct Policy annually. This is in addition to targeted live training that are provided throughout the year.

Section 6 - Oversight, Effectiveness and Accountability

The effectiveness of our programs can be measured through our company wide reporting processes which are supported throughout our organisation by internal and external resources including but not limited to internal audit, vendor compliance, trade compliance, legal, human resources, environmental, sustainability and health and safety teams.

All our compliance programs, including our efforts to combat slavery and human trafficking, are overseen and enforced at the highest level in the organization. The strategic plan and day-to-day operations of our compliance programs are the responsibilities of the Wesco Group's Chief Ethics and Compliance Officer and the Wesco Group compliance team. On at least a quarterly basis, the Chief Ethics and Compliance Officer informs the Wesco Group Executive Compliance Committee, consisting of the Wesco Group's Chief Executive Officer, Chief Financial Officer, Chief Human Resources Officer, General Counsel and Vice President of Internal Audit, of the status of compliance activities, Business Integrity Line reports received, and investigations conducted. The Chief Ethics and Compliance Officer also provides program updates and investigation reports to the Audit Committee of the Wesco Group's Board of Directors during its regular meetings.

The Home Office Statutory Guidance on the Modern Slavery Act 2015 recommends six areas of information a slavery and human trafficking statement should include, and these are addressed as follows in our statement:

