



# Modern Slavery Act 2015

SLAVERY AND HUMAN TRAFFICKING STATEMENT - YEAR ENDED 31 MARCH 2024

## 1. Our Policy

Exertis (UK) Ltd (Exertis) is opposed to slavery and human trafficking in any part of our activities or our supply chains. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the period covered by this statement.

## 2. Our Business

We are a distributor and producer of products in the technology sector. Seasonal work is a feature of the industry in which we operate due to peak demand on Black Friday and at Christmas. More information on our business is available at [www.exertis.co.uk](http://www.exertis.co.uk).

We are a part of the DCC Group. DCC is a leading international sales, marketing and support services group with a clear focus on performance and growth. Its headquarters are in Dublin, Ireland. It is listed on the London Stock Exchange and is a constituent of the FTSE 100 Index.

DCC currently has operations in 22 countries and employs approximately 16,000 people. Additional information on the Group is available at [www.dcc.ie](http://www.dcc.ie).

## 3. Organisational Structure and Supply Chains

Our business is organised into six business units: Digital, Mobile, Consumer, Business, Supplies and Enterprise. We distribute a broad range of consumer and business technology products and also provide specialist sales support, logistics and supply chain services to customers across the consumer, B2B and enterprise markets from our own brands as well as the world's leading third party manufactured brands.

The large majority of the products we sell are sourced from reputable suppliers who are based in the UK and the European Union. We also source a number of products from suppliers based in the following territories:

Australia	Israel	South Africa	UAE
Canada	Qatar	Switzerland	USA
China	Republic of Korea	Taiwan	Vietnam
Hong Kong	Singapore	Thailand	

The following table contains a summary of the activities that we consider present the highest risk of slavery and human trafficking in the industries in which we operate, with, in each case, a summary of the steps we have in place to avoid these affecting our activities or our supply chains.

Industry Risk	Steps Taken
<p>Conditions and treatment of workers in third party factories that supply Exertis and its suppliers with technology products located in higher risk countries for slavery and poor working conditions and/or limited legal protections.</p>	<p>Factory audits undertaken by our Quality team include an extensive range of questions designed to identify actual or potential violations of workers’ rights, human rights and local laws, including assessing the potential for modern slavery and people trafficking.</p> <p>Any factory not meeting the standards set out in our policies and procedures in this area (see further sections 4 and 5 below) automatically fail the audit.</p> <p>Wherever possible corrective actions will be agreed immediately with the factory to resolve the identified issues. Where this is not possible, we will not purchase products from the factory.</p> <p>Over the past year, Exertis has rationalised its list of own brand supplying factories from 11 to 8 (a reduction of 27%) with a view to creating stronger partnerships with our supplying factories who share our ethical values and policies.</p>
<p>An area of continuing focus for the Technology division is the risk of Uighur Muslim slave or forced labour being used in the production of products originating in the Xinjiang region of China.</p>	<p>This situation is being monitored and additional due diligence is being undertaken as appropriate.</p>
<p>The ongoing war in Ukraine has resulted in a significant displacement of Ukrainian citizens since 2022. This may have increased the risk of slavery and human trafficking in some parts of Europe.</p>	<p>We are continuing to monitor this risk and will, with our suppliers, continue to do so, in addition to providing support where we can.</p>

Exertis did not identify any instances of slavery or human trafficking in our activities or in our supply chains during the year under review.

**4. Our Policies on Slavery and Human Trafficking**

The DCC Code of Conduct sets out our Group’s commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specifically, section 2 of the Code sets out our commitment to fair employment practices and section 14 of the Code sets out our commitment to preventing, as far as practicable, slavery and human trafficking in our supply chains.

In addition, the DCC Group Supply Chain Integrity Policy sets out the approach taken by every business in the DCC Group to ensuring that all the products we sell meet applicable legal and ethical standards.

In addition, the DCC Human Rights Policy sets out DCC’s specific commitment to operate to internationally recognised standards of human rights, including in relation to forced labour, child labour and unsafe working conditions.

These documents are available at <http://www.dcc.ie/responsibility/our-policies>. Our policy on slavery and human trafficking is set out in section 1 of this statement.

The requirements of our Code of Conduct, Group Supply Chain Integrity Policy, Human Rights Policy and our own policy are reflected in the more detailed policies and procedures that we have in place in Exertis. These are addressed in more detail in section 6 of this statement.

Exertis (UK) Ltd has adopted a whistleblowing policy framework that provides mechanisms for employees to raise concerns about any potential wrongdoing, including modern slavery risks. The framework includes a 24-hour anonymous whistleblowing freephone hotline, operated by an independent company, Safecall.

## 5. Due Diligence and Assessing and Managing Risk

As part of our compliance with the policies referred to above, we take the following steps:

- Assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks;
- Monitor potential risk areas in our supply chains on a periodic basis.

## 6. Assurance and Key Performance Indicators

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the directors of Exertis.

We report on compliance with the DCC Group Code of Conduct and Supply Chain Integrity Policy every six months.

## 7. Training and Awareness

In the period covered by this statement 656 employees in our business completed online training on our Code of Conduct which covered the protection of human rights, including the prevention of slavery.

We also provide training to relevant employees on the protection of human rights and on supply chain risks, including the risk of slavery and human trafficking at suitable intervals. Our participation in industry associations and our dealings with suppliers also provide information on where slavery and human trafficking risks may arise in the industries where we are active and best practice in avoiding them.

## 8. Nature of this Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2024.

This statement has been approved by the board of directors of Exertis (UK) Ltd.

**Tim Griffin**

CEO - Exertis (UK) Ltd