

Modern Slavery Act Transparency Statement

Slavery and Human Trafficking

Rubix Group Holdings Limited and its subsidiaries detailed in its Annual Report and Financial Statements for the financial year ended 31 December 2018 (including, but not limited to, Rubix Group International Limited) (together, “Rubix”) does not condone and will not participate in any form of human exploitation, including child or forced labour, slavery and / or people trafficking. Rubix is aware of the provisions of the Modern Slavery Act 2015 (the “Act”) and this statement sets out the steps that Rubix has taken to try and remove the risk that slavery and human trafficking is taking place in its supply chain or within Rubix’s business.

Our Business & Supply Chain

Rubix is the leading pan-European added value distributor of high-quality industrial maintenance, repair and overhaul products and services. 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 is headquartered in the UK and our European footprint now covers over 20 countries. Rubix serves over 220,000 customers in every manufacturing sector, leveraging our pan-European network and delivering 24/7/365 locally across Europe. Key market brands within the Rubix group include Brammer, BT Brammer, Buck & Hickman, Giner, Julsa, Kistenpfennig, Matrix, Minetti, Montalpina, Novotech, Orexad, Robod, Syresa and Zitec. Rubix is the authorised distributor of many of the world’s leading engineering component manufacturers. As an industrial supply distributor, we offer around 10 million individual products.

Our Policies

Rubix is committed to ensuring that slavery and human trafficking is not taking place in its supply chain or as part of Rubix's business. Many of Rubix's existing policies contain relevant elements which seek to ensure that this is the case, including the following which are either implemented or are in the course of being implemented across Rubix:

- **Group Code of Conduct and Ethics**, applicable to all affiliates, sets out Rubix's expectation that all employees should behave in an ethical and law-abiding manner. This Code includes also Rubix's commitment to respecting the human rights and all applicable laws and international requirements regarding labour as well as to protecting employees.
- **Dignity at Work Policy** sets out Rubix's ethos that each Rubix employee has a right to work in a safe and supportive environment. Rubix recognises and respects the legal and moral rights of all persons affected by its operations and is committed to providing a working environment free of harassment, discrimination or prejudice. It reaffirms Rubix's strong belief in the benefits of non-discrimination and equality of opportunity.
- **Whistleblowing Policy**, under which Rubix commits to the highest standards of openness, probity and accountability. The effectiveness of this policy is further enhanced following the roll-out of the already existing 24-hour, confidential, whistleblowing hotline, operated by an independent partner, which all employees are encouraged to use to report serious concerns concerning matters in the workplace.
- **Supplier Code of Conduct**, under which Rubix requires its suppliers to conduct employee relations in an ethical manner and in compliance with rules stipulated by both international and local laws and industry standards.
- **Recruitment standards**, which require pre-employment checks to be made in line with applicable legislation on all new employees, including a candidates' eligibility to work.

Risk Assessment and Due Diligence Training and effectiveness

Rubix recently completed a group-wide employee survey to obtain feedback for management and to identify areas to focus on to increase employee engagement.

Rubix has introduced 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 prompt investigation.

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

Approved by the Rubix Group Holdings Limited board of directors.

21 June 2019

Andrew Silverbeck, Director, for and on behalf of Rubix Group Holdings Limited