

Rexel: A socially responsible company

Rexel is committed to the principles that make it a responsible and socially responsible company, this applies to its governance rules that are applicable at all levels of the Group's organization. These principles, which are set out below, constitute the framework for Rexel's responsible and socially responsible practices internally and in its relations with external stakeholders such as shareholders, customers, suppliers, service providers or local authorities and communities. Rexel is actively involved in sustainable development. Since 2011, the Group has supported the United Nations Global Compact, and is committed to respecting and promoting its 10 principles.

— COMPLIANCE WITH AND RESPECT FOR THE LAW

Rexel undertakes to respect national and international laws and regulations

in terms of protection of human rights, labour laws, protection of the environment, anti-corruption and money laundering, respect for transparency, taxation, financial and non-financial reporting, competition law, protection of personal data and any other applicable social, economic, technical and environmental legislation. No Rexel employee, in the performance of his/her duties, should ever invoke Rexel interests as a justification for being able to violate the law or local regulations. If an employee has a question about the application of the law, he/she should consult his/her manager or Rexel Ethics Correspondent or the Compliance Officer for guidance.

— RESPONSIBILITY AND INTERNAL CONTROLS

Rexel requires its subsidiaries to use their resources in an efficient and controlled manner to manage its operations sustainably.

Rexel is committed to identifying and managing the risks associated with its business activities. Rexel maintains a system of internal controls that provide reasonable assurances that its business is conducted in compliance with appropriate regulations and directives of Senior Management, that contribute to combating fraud.

This system also contributes to an exchange of good practices between subsidiaries and promotes a relationship based on mutual trust between the Group and its shareholders.

PURCHASES

All Rexel purchases are made for specific and legitimate business reasons, in terms that are clear to our suppliers. These purchases are transacted in a transparent, competitively bid manner and the formal obligations of the parties are clearly set forth.

Employees are encouraged to read the [Rexel Anti-Corruption Code of Conduct](#).

GIFTS AND INVITATIONS

Rexel employees shall neither give nor receive gifts or invitations that would be considered illegal, which are, or could appear, inappropriate or excessive, or that could directly or indirectly harm Rexel or the other party. Any acceptable gifts and invitations should be of a low and symbolic value and should not be of a nature that would influence the judgment of the receiving party. In any case, whatever the value, employees should discuss the exchange or giving of gifts, bonuses and invitations in advance with their direct manager. Finally, gifts should never be in cash or cash equivalents.

Employees are encouraged to read the [Rexel Anti-Corruption Code of Conduct](#).

CORRUPTION ET ILLICIT PAYMENTS

Rexel rejects corruption in all its forms and undertakes not to participate in any illegal practices or acts with a view to obtaining advantages or exemptions that are illicit or inappropriate. Illicit payments or the giving of other valuables, gifts, loans, discounts or excessive expenses payments, the use of funds or property belonging to Rexel, with the aim of influencing a decision of any kind whatsoever, are strictly forbidden.

Employees are encouraged to read the [Rexel Anti-Corruption Code of Conduct](#).

CUSTOMERS

Customer confidence is a priority. Rexel listens to its customers' needs to raise their level of satisfaction. As a rule of good management, Rexel informs its customers of its terms and conditions of sale of its goods and services and clearly stipulates its obligations. It considers their complaints, assists in the fair and quick resolution of disputes, without undue costs or formalities. Rexel wishes to build relationships with its customers based on trust, notably regarding the respect of ethical principles recognised by Rexel. Rexel will verify that these principles have been correctly understood and respected if necessary.

Employees are encouraged to read the [Rexel Anti-Corruption Code of Conduct](#).

CONFLICT OF INTERESTS

Employees are required to avoid all conflict of interest, real or apparent, in the fulfilment of their professional duties and to take decisions that first and foremost serve Rexel's interests. The mere appearance of a conflict of interest is harmful. Conflict of interest is understood to mean any situation in which a person has a personal or private interest that may influence the objective fulfilment of his/her professional duties and responsibilities. It may be the personal or private interest of the employee, a family member or acquaintance, whether a natural or legal person. Employees should avoid any situation in which they, a member of their family or an acquaintance, would profit or appear to profit personally from Rexel's relationship with its customers or suppliers. The employee should report any situation that could possibly be a conflict of interest or a risk of a conflict of interest to his/her manager or their Rexel Ethics Correspondent or the Compliance Officer.

ENVIRONMENT

Rexel strives constantly to reduce the environmental impact of its business activities, in its consumption of resources (energy, paper, packaging and water), waste production and greenhouse gas emissions, mainly generated by its supply chain. Rexel also advocates for the development and distribution of solutions that improve energy-efficiency in its customers' buildings and industrial facilities.

Employees are encouraged to read [Rexel's Environmental Charter](#), applicable to all sites of the Rexel Group.

SUPPLIERS

Rexel seeks to build partnerships with suppliers who help it to offer its customers the most suitable range of products and the best services. Rexel acts impartially in its relations with its suppliers and takes care to consider the interests of all parties. Rexel expects its trading partners and suppliers to refer to the ethical principles recognised by Rexel and respect human rights, fundamental freedoms, the environment and the health and safety of individuals. Rexel will verify that the ethical principles have been correctly understood and respected at the time of selecting suppliers and trading partners as well as throughout business relations with its suppliers and preferred partners.

Employees are encouraged to read the [Rexel Anti-Corruption Code of Conduct](#)

TRANSPARENCY

Rexel ensures that accurate, reliable and relevant information regarding its activities, structure, financial situation and business results are communicated in a regular and timely manner. Rexel also applies ambitious standards in communicating non-financial information, particularly regarding its corporate governance and risk management in addition to social and environmental policies.

ACCURACY OF FINANCIAL STATEMENTS

Rexel attaches significant importance to the accuracy of its accounts and the quality and reliability of the financial information released. Any practices that alter the accuracy of the financial statements are prohibited. The Group's employees can in no way make, approve or grant a payment on behalf of the Group or entities with the intention that all or part of the said payment is to be used for a purpose other than that indicated in the supporting documentation.

GROUP PROPERTY

Group property must only be used for legitimate professional purposes. Group property is taken to include the company name, information concerning the company, its premises,

stocks, equipment, fixtures and fittings, IT equipment, software and company vehicles. All employees undertake to ensure the correct use, maintenance and upkeep of professional equipment that is entrusted to them to ensure its long-term use.

— CONFIDENTIALITY

Information concerning Rexel that is entrusted to employees remains the property of the Group. Every employee takes the necessary precautions to ensure that information he/she holds for professional purposes remains confidential at all times. Employees ensure that the rules for distributing, copying, archiving or destroying documents are fully respected. No confidential or classified information is to be released or used in any way whatsoever for personal benefit.

— COMPETITION

Rexel follows business practices that respect competition law, by protecting healthy and real competition as a catalyst for growth and innovation. In this context, Rexel undertakes to make business decisions independently of its competitors, not to enter into any agreements restricting competition, not to abuse a dominant market position and to submit proposed transfers and acquisitions to the competition authorities.

Employees are encouraged to read the Rexel Guide explaining the principles of competition law.

— DATA PROTECTION

Rexel undertakes to respect the personal data and private life of its employees and partners. As such, Rexel collects and stores personal data required for its business activities, ensures that this is used fairly, for a specific, clear and legitimate purpose and that it is kept secure for the period necessary for processing purposes.

As it is established worldwide, Rexel also strives to respect legislation applicable to personal data in each of

its subsidiaries.