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RUBIX



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 2019 (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 have established ourselves as a multi-specialist, providing products and services, backed by a growing digital business, a commitment to excellence in distribution and a well-oiled M&A machine. With turnover of €2.4 billion in 2019, we are Europe’s largest supplier of industrial maintenance, repair and overhaul (MRO) products and services. Our 750+ locations across 22 countries offer specialist expertise in specifying, providing and installing an unrivalled scope of industrial parts, with a tailor-made service for all customers.

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, Matrix, Minetti, Montalpina, Novotech, Orexad, Robod, Syresa, Schäfer, C. Plüss, Canellas Protecchio, Fluidmec, Lerbs, Motronic, Stop-Fluid, Peter Campbell, Desarrollos 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. We operate in European countries and adhere to their strict legislation.

We exist to keep the wheels of industry turning – right across Europe. We are committed to delivering sustainable long-term value for our customers, employees, investors and other stakeholders.

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. Our policies are approved by senior management in consultation with relevant stakeholders. 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**, which sets out Rubix's expectation that all employees should behave in an ethical and law-abiding manner. This Code states: "Rubix is committed to meeting its responsibility to respect and promote human rights, and to avoiding any infringement of human rights or any adverse impact on, or abuses of, such rights."
- **Dignity at Work Policy**, which 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. There is a whistle-blowing mechanism administered by a third party in place to enable employees to voice compliance-related concerns in a responsible and effective manner, helping to prevent and detect serious malpractice or wrongdoing. 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.
- **Recruitment standards**, which require pre-employment checks to be made in line with applicable legislation on all new employees, including a candidate's eligibility to work.
- **Supplier Code of Conduct**, under which Rubix endeavours to select suppliers who adopt high ethical standards which are consistent with Rubix's corporate beliefs and values. Rubix expects its suppliers (and their subcontractors) to operate their businesses and conduct employee relations in an ethical manner and to meet the requirements stipulated by both international and regional laws and industry standards. Suppliers should prevent illegal or forced labour and child labour as well as comply with maximum work hours, minimum wages and appropriate dismissal procedures.

We encourage our employees to act in a manner consistent with the prescribed Rubix values.

Risk Assessment and Due Diligence

The risk of slavery and human trafficking within Rubix's organisation is considered to be substantially diminished through the implementation of the above-mentioned policies. In addition, Rubix seeks to identify and minimise the risk of slavery and human trafficking in its supply chain by endeavouring to select suppliers who adopt high ethical standards which are consistent with Rubix's corporate beliefs and values, and seeks to build long standing relationships with these suppliers. These standards include respecting the rights of the individuals who are employed by them. The majority of Rubix's products are sourced from leading manufacturers within Europe who adopt high standards.

Training and Effectiveness

In the past year, we implemented the Rubix Academy across the group as the digital learning platform.

Every year, Rubix carries out a group-wide employee survey to obtain feedback for management and to

identify areas to focus on to increase employee engagement and learning.

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

June 2020

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

Our customers

Challenges we solve

Adding value

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