

# Modern Slavery Act Statement

Mayflex Holding Limited (Mayflex) is committed to maintaining and improving its systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain and our products. We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and workplace abuse. From this point onwards we will use the expression “**slavery and human trafficking**” to encompass these various forms of coerced labour.

Our commitment to human rights is enshrined within the **Sonepar Human Rights Policy (Mayflex is a Sonepar Company)** **Sonepar Code of Conduct (Mayflex is a Sonepar Company)**.

This statement refers to the actions that were undertaken during the 2025 Financial Year (01/01/2025-31/12/2025) and reiterates the Mayflex’s commitment to our existing standards and perseverance in performing actions and activities aimed at limiting any potential modern slavery and human trafficking risks related to our business.

## + Our business

Mayflex is a leading distributor and manufacturer specializing in infrastructure, networking and converged IP security solutions. We use our specialist knowledge and experience to bring together best in class solutions covering, Infrastructure, Networking and Electronic Security and meet the demanding needs of all types and sizes of businesses and organisations in the 21st century.

Mayflex brands: Excel, Elevate, Environ, XeLan

## + Our structure

Mayflex is a Sonepar company and the highest parent of Mayflex UK Limited (incorporated in the UK), Excel Networking Solutions Limited (incorporated in the UK), Mayflex MEA DMCC LLC (incorporated in the United Arab Emirates), Mayflex Trading LLC (incorporate in the United Arab Emirates), and Mayflex Company (incorporated in Kingdom of Saudi Arabia) .

Mayflex’s Head Office is based in Birmingham, UK and we have a shared office facilities in St Neots, London, Dubai and Kingdom of Saudi Arabia, from which we serve the UK, Europe and our international customer partner regions.

This statement covers the activities of all above-mentioned subsidiaries.

## + Our supply chain

We purchase all the goods we distribute from third parties based in various countries around the world.

We are strongly committed to conducting our business in a lawful and ethical manner, including engaging with suppliers that hold the same principles.

We require manufacturing suppliers to comply with **Sonepar Business Partner Code of Conduct**.

Mayflex expects all our suppliers to hold their suppliers and subcontractors to the standards and practices covered by the **Sonepar Business Partner Code of Conduct**.

All products, commercialised by Mayflex, must be manufactured in a manner that meets or

exceeds our and our customer expectations as reflected in **Sonepar Business Partner Code of Conduct** and in areas such as:

- Compliance with laws
- Human rights and in particular child labour, Human trafficking and forced labour
- Fair and ethical employment practices
- Protection of the Environment as well as Health and Safety of staff, visitors and others who might be involved with business activities
- Compliance with anti-corruption laws
- Fair competition
- International trade compliance in all its aspects
- Cyber Security and Data Protection

We partner closely with our suppliers to drive continuous improvement in workers conditions. We train our suppliers on the standards and conduct required.

#### + Our Policies and Procedures

Mayflex (a Sonepar Company) has a comprehensive Compliance Program which is composed of several policies, procedures and practices designed to assess and address compliance with legal and regulatory requirements, including slavery and human trafficking.

- **Sonepar Code of Conduct** together with Internal Compliance Manual makes clear to all employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour also when operating overseas.
- **Sonepar Business Partners Code of Conduct** sets out the standards Sonepar requires from its business partners and its expectation on business partners to commit to the same high ethical standards.
- **Sonepar Human Rights Policy** outlines Sonepar's requirement to comply with various aspects of human rights.
- **Corporate Social Responsibility (CSR)** sets out our policies and principles and summarises how we manage our environmental impacts, how we are working with suppliers and local communities and know how our employees and/or partners contribute to these initiatives.
- **Sonepar Whistleblowing Policy** in support of the Compliance Program, we have also established a dedicated whistleblowing platform referred to as the Speak Up Line, administered by a third party organization. It enables all associates and stakeholders to report any suspected violations of our Code of Conduct as well as instances of fraud, theft, corruption, violations of law, or threats to Sonepar/Mayflex's business integrity, including violations or potential violations that may relate to human rights. This platform is available 24/7 over the phone, by email and through [Sonepar Alert Platform](#) open to all, confidential and secure.

Mayflex encourages all its workers, customers, and other business partners to report any concerns related to its direct activities, or its supply chain's activities in accordance with **Sonepar Whistleblowing Policy**.

## + Due diligence and Risk assessment

We undertake careful due diligence and monitoring before and when dealing with business partners.

We do so by:

- Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks associated to each new supplier.
- Reviewing on a regular basis all aspects and risks associated to the supply chain.
- Continuously monitoring our suppliers through reputable compliance databases.
- Conducting supplier audits or assessments through third party auditors, which have a greater degree of focus on slavery and human trafficking where general risks are identified.

With reference to our brand supply chain, we use independent auditors to audit suppliers and verify compliance. We assess all suppliers periodically to monitor continued compliance and improvement. Mayflex may terminate its relationships with any supplier that violates our Supplier Code of Conduct or does not cooperate with our auditors.

## + Recruitment and selection policy

Mayflex is committed to its employment practices being fair and compliant with relevant legislation. The purpose of this policy is to assist the Company in recruiting the best and most talented individuals fairly, without prejudice, and conscious or unconscious bias.

Temporary staff are recruited based on their skills, qualifications, experience, potential and motivation and regardless of gender, race, ethnic origin, sexuality, religion, marital status, age or disability. Only specified and reputable employment agencies, who are obligated to follow our recruitment standards, are used to source labour.

## + Dignity at work policy

We are committed to providing a working environment that ensures that all employees are treated fairly, equally, and decently. We believe that everyone has the right to be treated with dignity and respect.

Harassment or bullying can cause fear, stress, anxiety. This can adversely affect job satisfaction and an individual's morale. Any form of harassment and bullying, within the business, is unacceptable behaviour and will not be tolerated. Offenders will be subject to disciplinary action and, where appropriate, referred to Police Authorities for investigation and prosecution.

Everyone has a personal responsibility for their own behaviour and a duty of care to treat each other with dignity and respect. This includes individuals being aware of the appropriateness of their conduct, making sure that their own behaviour does not cause offence or misunderstanding. We encourage any employee who witnesses inappropriate behaviour to report it, as soon as they are able, to their manager or via the Whistleblowing platform.

## + Training

Mayflex requires staff directly involved with Governance, Risk & Compliance, Finance, Procurement,

Sales, and Human Resources to complete Modern Slavery awareness training.

This training covers:

- Our business's purchasing practices that influence supply chain conditions and which should be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage and the provision of products by an unrealistic deadline.
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including available resources and support.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

#### + Awareness-raising programme

As well as training staff, we raise awareness of modern slavery issues by drawing attention on our statement and explaining:

- The basic principles of the Modern Slavery Act 2015.
- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available, for example through the Modern Slavery Helpline

#### + Assessment of effectiveness of measures

Sonepar runs a robust internal control and assessment system annually. This system covers an extensive range of operating rules and processes. The internal control framework evaluates the effectiveness and implementation of our policies and procedures throughout the company, including those related to human rights.

An independent analysis company EcoVadis awarded Mayflex a Silver Medal. EcoVadis assesses organisations in four main areas: environmental, labour and human rights, along with ethics and sustainable procurement.

#### + Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually. This statement will be published on the Mayflex website.

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Andrew Percival  
Managing Director Date:  
4<sup>th</sup> February 2026