Slavery and Human Trafficking
Statement
Year ending 31st March 2025

1st October 2025





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### 1. Our Policy

Exertis Hammer Limited trading as Hammer Distribution ('Hammer Distribution') 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 of technology infrastructure products in the technology sector. Seasonal work is not a feature of the industry in which we operate. More information on our business is available at <a href="https://www.HammerDistribution.com">www.HammerDistribution.com</a>

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 over 16,700 people. Additional information on the Group is available at <a href="https://www.dcc.ie">www.dcc.ie</a>.

### 3. Organisational Structure and Supply Chains

Our business is organised into 2 business units: Enterprise, which supplies technologies to run business IT infrastructure and Cybersecurity which provides technologies which help business mitigate risk against cyber and online threats.

Our products are sourced from reputable suppliers and the majority have established supplying organisations with-in the UK and EEA. We also source a number of products from Australia, Canada, China, Hong Kong, Isarael, Singapore, Taiwan and the United States.

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
Conditions and treatment of workers in third party factories that supply Hammer Distribution and its suppliers with technology products located in higher risk countries for slavery and poor working conditions and/or limited legal protections	We have enhanced our due diligence processes and controls with additional screening and assessments for both factories and suppliers including checking entities against the Global Slavery Index and Corruptions Perception Index, asking 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. In addition, we have enhanced our onboarding processes to monitor risk at a product level.
	Any factory and supplier 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.
	Wherever possible corrective actions will be agreed immediately with the factory and / or supplier to resolve the identified issues. Where this is not possible, we will not purchase products from the factory.
As an area of continuing focus for the Hammer Distribution is the risk of Uighur Muslim slave or forced labour being used in the production of products origination in the Xianjiang region of China	The situation is being monitored, and additional due diligence has been implemented including the engagement of independent third-party labour and human rights audit firms to perform onsite ethical and traceability audits.
The ongoing war in Ukraine by Russian forces has resulted in a significant displacement of Ukrainian citizens. This may increase the risk of slavery and human trafficking in some parts of Europe.	We are monitoring the risk and will, with our suppliers, continue to do so, in addition to providing support to do so. Furthermore, we have enhanced our screening on all suppliers to support monitoring of this risk.

# 4. Policies in Relation to Slavery & 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.

The DCC Group *Supply Chain Integrity Policy* sets out the approach taken by every business in the DCC Group to ensure 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 www.dcc.ie.

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 Hammer Distribution Enterprise. These are addressed in more detail in Section 6 of this statement.

### 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 Hammer Distribution.

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, 163 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 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 2025.

This statement has been approved by the board of directors of Exertis Hammer Limited, trading as Hammer Distribution.

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Jason Chibnall Managing Director Hammer Distribution 10-May-2025