

Anixter Business Ethics

ANIXTER'S GLOBAL
BUSINESS ETHICS
AND CONDUCT POLICY

A large circular inset image with a blue tint and a white-to-orange gradient border. It shows two men in business shirts and dark trousers standing on a modern office balcony with glass railings. They are looking down at a tablet held by the man on the right. The background shows a bright, modern office interior with large windows.

ANIXTER

Build. Connect. Power. Protect. Services. Worldwide.

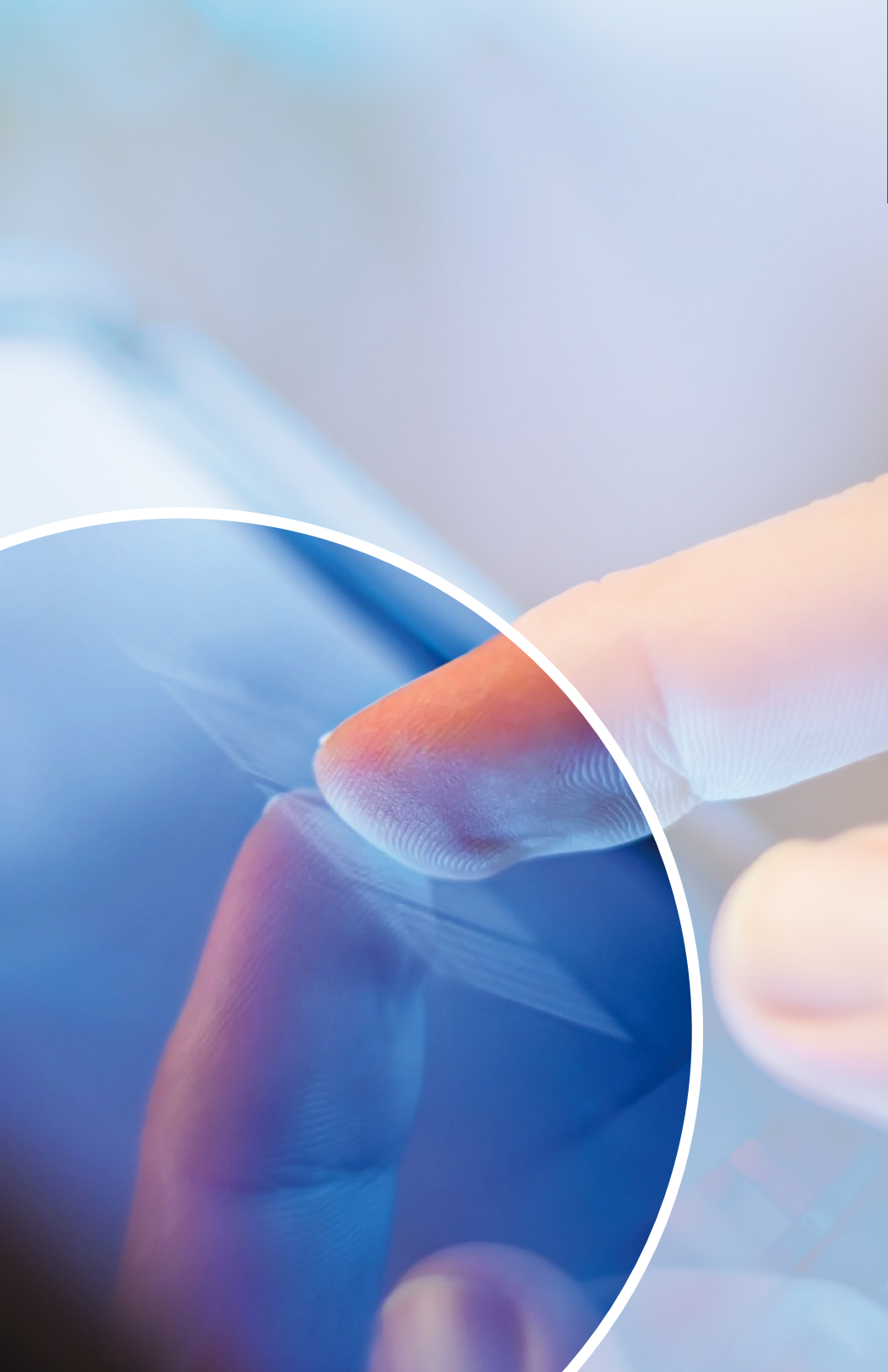


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ANIXTER CONNECTS



Anixter's Commitment to Ethics

Each day all around the world, we connect with customers, suppliers and our Anixter teammates. We know that business is based on people working and connecting with people. We are proud of the respectful, honest way we connect with everyone we encounter.



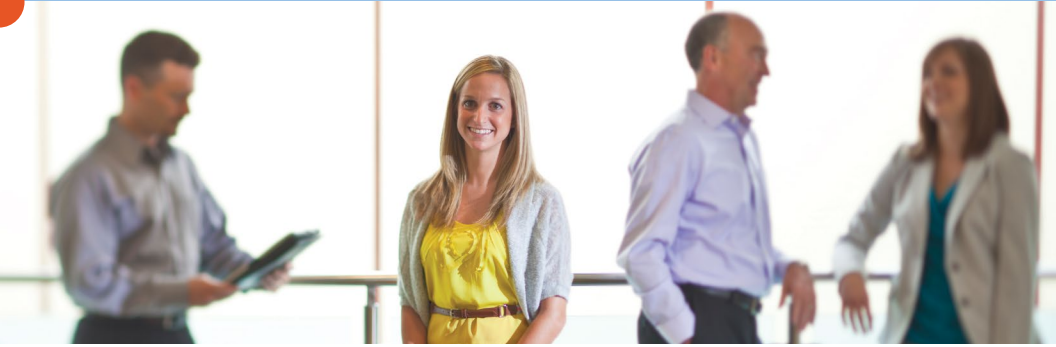
“INTEGRITY IS DOING THE RIGHT THING, EVEN IF NOBODY IS WATCHING. WE WOULD RATHER LOSE MONEY, A CUSTOMER, A SUPPLIER, OR AN ORDER THAN VIOLATE OUR ETHICS POLICY, OUR INTEGRITY, OR THE LAW.” - THE ANIXTER BLUE BOOK

This Ethics Policy is designed to assist us in complying with the laws and ethical principles that govern our business conduct. This Ethics Policy applies to our directors, officers and employees. At all times, we will transact business in full compliance with all applicable laws and in accordance with the highest principles of business ethics and conduct.

This Ethics Policy is not a comprehensive document that addresses all company policies and laws we may encounter. Instead, it is a guide and resource intended to alert us to significant legal and ethical issues we are likely to encounter. This Ethics Policy is supplemented by other company policies. All applicable company policies relating to this Ethics Policy are available on your local Ethics and Compliance intranet site. When faced with a situation not covered in our Ethics Policy, each of us should ask, “Would I be proud of myself and Anixter if the situation were fully reported on the front page of my local paper or shown on the nightly news?” We strive to avoid any situation that might give even the impression of impropriety. If in doubt, ask for guidance.



“WE TELL THE TRUTH TO EACH OTHER AND TO OUR CUSTOMERS AND OUR SUPPLIERS. WE TELL THE WHOLE STORY, NOT JUST PART OF IT. WE DON'T STRETCH IT, BEND IT OR AVOID IT...ONE LITTLE LIE AND YOU'RE A LIAR!” - THE ANIXTER BLUE BOOK



Management Commitment and Responsibilities

Each manager is a resource for other employees. We pride ourselves on our open, caring and informal workplace where two-way communication is encouraged. Our open communication allows us to be on alert for, and to feel comfortable reporting, any potentially illegal or unethical conduct or situation. While all of us are expected to conduct ourselves ethically, our managers have additional responsibilities:

- to create and maintain a work environment with the highest standards of ethical business conduct;
- to ensure that everyone working with them clearly understands all legal and ethical obligations and our Ethics Policy;
- to make sure employees are comfortable raising concerns without fear of retaliation;
- to prevent retaliation against those who speak up; and
- to lead by example in modeling our Ethics Policy and guidelines in everything they do.

We encourage you to discuss any questions about our Ethics Policy with any manager.

Questions and Reporting Non-Compliance

If you ever feel pressured to commit an act that conflicts with our Ethics Policy, believe a colleague is violating this Ethics Policy or otherwise have any questions or concerns, you should feel comfortable talking to any manager, compliance officer, Human Resources, Internal Audit or our Legal Department. You may also make reports anonymously by contacting the Business Integrity Line at anixter.ethicspoint.com. Reports can be made online or by telephone.

All of us are required to adhere to this Ethics Policy and to promptly report any violation of our Ethics Policy or the law. Anixter takes all reports of possible misconduct seriously. Anixter will investigate promptly, thoroughly and confidentially and take appropriate corrective action, which may include disciplinary action, dismissal and other penalties. Any information will be held in confidence and disclosed only to the extent necessary to effectively investigate and resolve the matter. All of us are required to cooperate fully with any investigation that results from a report.

IF IN DOUBT ABOUT A PARTICULAR TRANSACTION OR UNCERTAIN ABOUT THE BEST COURSE OF CONDUCT...

- *Discuss with your manager*
- *Contact your regional compliance officer, see “Compliance Officers” on your local Ethics and Compliance intranet site*
- *E-mail ethics@anixter.com*
- *Call 1.800.ANIXTER or U.S. Access Code +224.521.8000 and ask for our Chief Compliance Officer*
- *Contact the Legal Department*

IF YOU WISH TO REMAIN ANONYMOUS...

- *Call the Anixter Business Integrity Line*
- *Go to anixter.ethicspoint.com*

Anonymous Reporting

Anyone can anonymously report a violation (or potential violation) of our Ethics Policy by contacting the Anixter Business Integrity Line. To access the Business Integrity Line, find specific country call-in numbers or submit an anonymous report online, go to anixter.ethicspoint.com. Calls and reports are handled by an outside resource. Translation services are available. The reporter's identity will not be provided to anyone at Anixter. Some European regulations limit what may be reported anonymously (these are primarily only financial, accounting and auditing matters), so the third-party provider will ask questions about the location and issue involved to ensure compliance with applicable laws.

Non-Retaliation

We do not tolerate any form of harassment or retaliation against any employee who in good faith reports or discloses violations of our Ethics Policy or the law or acts as a witness.

RESPECT FOR EACH OTHER

We treat each other fairly, and with dignity and respect. We create a positive work environment free of discrimination, harassment and inappropriate conduct.



We Treat People Fairly and Do Not Tolerate Discrimination

We provide a workplace where all employees have the opportunity to reach their full potential and contribute to our overall success. We value each person's skills and contributions. We are deeply committed to the fair and equitable treatment of all employees and applicants for employment. We treat each person fairly, courteously, respectfully and with dignity. Our workplaces have an atmosphere of open communication and mutual respect, valuing each unique individual. We know that our diversity is what makes us strong and successful.



"AT ANIXTER, WE DON'T HIRE PEOPLE. WE ASK THEM TO JOIN OUR COMPANY TO HELP MAKE IT BETTER." - THE ANIXTER BLUE BOOK

We comply with all employment laws and regulations wherever we operate and will not tolerate unlawful discrimination of any kind. For example, we do not discriminate based on age, race, religion, color, disability, national origin, gender, gender identity, sexual orientation or veteran status. All matters relating to hiring, training, compensation, benefits, promotion, transfer, termination, working conditions and other aspects of employment and employee relations will be free of discrimination. We judge all applicants and employees by their unique qualifications and skills. If we see or experience any form of discrimination, we report it. We do not tolerate retaliation against anyone making a report in good faith.

Q&A

Q *I typically talk with my manager if I have any work issues, but whom would I talk to if I believe my manager is discriminating against me?*

A *If you do not feel comfortable talking to your manager, you should contact Human Resources, Internal Audit, the Legal Department or a compliance officer. You can also raise a concern or question anonymously by calling the Anixter Business Integrity line. Remember, we do not retaliate against any employee who reports or discloses violations of our Ethics Policy in good faith.*



For more information, please see our:

- Reaffirmation of Equal Employment Opportunity Policy
- Reaffirmation of Anti-Retaliation Policy

We Do Not Tolerate Harassment in the Workplace

We are committed to having a workplace that is conducive to the well-being and productivity of all our employees. Our workplace is free from demeaning, intimidating, offensive, abusive or harassing behavior. We do not tolerate unwelcome conduct, including improper advances, requests for sexual favors or any other conduct that creates an intimidating, hostile or offensive working environment. We speak out when an individual's conduct in the workplace or at a company event makes us, or those around us, uncomfortable. If we ever experience or observe workplace harassment, we report the incident. Anixter prohibits any form of retaliation against anyone who makes a report in good faith or otherwise cooperates in the investigation.

Q&A

Q *Can I raise a concern about harassment even if a non-manager is engaging in the harassing behavior?*

A *Yes. We do not tolerate harassment of any kind regardless of whether a manager or non-manager is engaging in such behavior.*

Q *My co-worker sometimes tells me jokes that I find to be offensive. What should I do?*

A *You should tell the co-worker that you believe such jokes are inappropriate for the workplace. You can also discuss this matter with Human Resources.*



For more information, please see our:

- Reaffirmation of Anti-Harassment Policy
- Reaffirmation of Anti-Retaliation Policy

We Provide a Safe and Healthy Work Environment

We provide safe and healthy work environments wherever we operate. We comply with all applicable health and safety laws and regulations and insist that work be done in a safe and responsible manner. It is the responsibility of each of us to follow all company policies and procedures for workplace health and safety and to report any accidents, injuries or potential safety hazards immediately.

We provide drug-free workplaces for all of our employees. We encourage anyone with a problem related to alcohol or drugs to seek assistance from Anixter's Employee Assistance Program or other qualified professionals. Anixter reserves the right to request drug testing whenever there is a safety concern and any refusal to undergo such testing will result in employment termination.

We do not tolerate violence or threatening behavior of any kind and the possession of weapons on Anixter premises is strictly prohibited. We each have an obligation to report any threats of violence or intimidation. Anixter will take appropriate disciplinary action, including termination, against any employee who violates its policy of providing a nonthreatening workplace.

Q I am concerned that a co-worker's use of alcohol may cause a safety problem, but don't want to get my co-worker fired. What should I do?

A *Anixter's main concern is the safety and well-being of all employees. In most cases, employees with alcohol problems will be referred to our Employee Assistance Program for help and treatment. If the employee has previously violated this aspect of our Ethics Policy, disciplinary action may be taken.*

Q&A



For more information, please see our:

- Reaffirmation of Substance Abuse Policy
- Global Workplace Violence and Response Policy

We Respect Employee Privacy

We respect the privacy and confidentiality of each employee's personnel, medical and financial records, and we retain only the employee information that is required for Anixter's operations or by law. All such information is treated as confidential and may not be copied, released or disclosed to any third party unless we receive prior written consent of either the employee or our Legal Department. We never disclose confidential information to anyone, within or outside Anixter, without a legitimate business or legal need and proper authorization. If we are authorized to access personnel or salary records, we properly restrict the disclosure of any such records under our control.

Anixter reserves the right to inspect all facilities and properties, such as computers, telephone records, e-mails, Internet usage, business documents, offices and other work areas, to the extent permitted by applicable laws.

Q Can the company inspect my e-mails and Internet usage without my knowledge or consent?

A *To the extent permitted by applicable laws, Anixter may inspect an employee's e-mails and Internet usage without the employee's knowledge or consent.*

Q&A



For more information, please see our:

– Employee Personal Data Protection Policy



RESPECT FOR CUSTOMERS, SUPPLIERS AND THE GLOBAL MARKETPLACE



We do business fairly and honestly and keep our promises. We know that our word is our bond. Our goal is for our ethical standards to meet or exceed the expectations of our customers. In turn, we expect our suppliers to have high ethical standards in the conduct of their business and act in accordance with all applicable laws and our Supplier Code of Conduct.



“CUSTOMERS ARE NOT DEPENDENT ON US. WE ARE DEPENDENT UPON THEM. THEY’RE DOING US A FAVOR BY GIVING US THE OPPORTUNITY TO SERVE THEM.”

“AT ANIXTER, WE TREAT SUPPLIERS AS CUSTOMERS, SO SUBSTITUTE THE WORD ‘SUPPLIERS’ FOR ‘CUSTOMERS’ AND REREAD THE ABOVE.”- THE ANIXTER BLUE BOOK

We Respect the Confidential Information of Customers, Suppliers and Competitors

We know our customers and suppliers count on us to protect their confidential information. Customer and supplier records are extremely confidential and are used only for legitimate business purposes by those of us with a need to access them.

We do not obtain, solicit or provide any confidential information about our competitors in any way that is contrary to applicable law. We do not accept information about a competitor from a former employee. If we come into possession of a competitor's information from a former employee of that competitor, we will not use it.



For more information, please see our:

- Partner Personal Data Protection Policy
- Supplier Code of Conduct

We Do Not Give or Accept Bribes

We have a zero tolerance policy against bribery. We never authorize, offer, give, request or accept a bribe in the course of doing business. We understand that bribes can take many different forms, including cash, gifts, entertainment, charitable donations, services, personal favors or anything else of value.

Our strict prohibition against bribery also extends to our business partners who perform services on our behalf, such as Anixter-appointed distributors or resellers, consultants, professional advisors, joint venture partners, customs brokers, freight forwarders, sales agents, and other agents or representatives. We take care to use business partners who understand our strict policy against bribery and act in a way that is consistent with our policy and applicable laws.



POTENTIAL WARNING SIGNS OR "RED FLAGS" FOR BRIBERY

- *Requests for payments in cash or to a bank account in a different name or country*
- *Requests for lavish gifts or hospitality*
- *Third parties who are government-owned entities or public officials*
- *Third parties who are doing business in countries with a reputation for high risk of corruption*
- *Third parties who lack the experience or resources needed for the engagement*



For more information, please see our:

- Global Anti-Bribery Policy
- Global Government Contracts Policy (covering U.S. Federal, State and Local Governments and their Contractors)
- Global Business Partner Anti-Corruption Policy
- Global Travel, Entertainment and Expense Policy

We Do Not Give or Accept Inappropriate Gifts or Entertainment

Our business decisions are based on merit. We select our suppliers and business partners based on objective criteria, such as the quality and pricing of their products and services, and we earn business from our customers on the same basis. We do not accept or provide gifts, favors or entertainment if it would obligate or even appear to obligate the recipient or influence a business decision. We do not request personal gifts, favors or entertainment nor do we provide gifts, favors or entertainment in response to such requests. We never accept or provide gifts of cash. We never provide a gift or entertainment that is against the law or against Anixter's policy or the policy of the recipient's company. We have even stricter rules when it comes to public officials, as further discussed on page 16 of this Ethics Policy. We never offer or provide public officials with any gift, favor or entertainment, regardless of its value.

If uncertain whether a gift or entertainment provided or received is appropriate, we talk to our manager, a compliance officer or the Legal Department. We respect our customers and suppliers and know that violating their policies could be detrimental to our relationships.

If we intend to give a gift, we first obtain the proper approval required under Anixter's Global Travel, Entertainment and Expense Policy. We do not accept any gift that may influence, or even give the appearance of influencing a business decision. When providing entertainment, we consider what is appropriate for the situation. We do not give or receive lavish or extravagant entertainment that may create even the appearance of impropriety.

Q My target customer is a huge football fan. I have told him I will get him tickets to next week's game if he places an order with Anixter. Is this a problem?

A Yes, it could be a problem. While gifts and entertainment are a normal part of business practice in most countries, they must be reasonable and appropriate under the circumstances, so that they do not create an appearance of impropriety. While our Ethics Policy and anti-bribery laws do not prevent you from giving gifts or entertainment to commercial business people, offering a prospective customer entertainment in return for the award of a contract could be viewed as a bribe and should be avoided.

Q A company we are considering for a supply contract has offered to fly me to a golf tournament for the weekend. Is that a problem?

A Yes, it could be a problem. We select our business partners and suppliers solely on legitimate business reasons. Accepting a supplier's offer to pay for your travel and lodging expenses and entertainment may create the appearance of improperly influencing a business decision. Please consult our policy on meals, gifts and discounts for guidance and always speak to your supervisor before accepting any gift or gratuity from a third party.

Q&A



For more information, please see our:

- Global Anti-Bribery Policy
- Global Government Contracts Policy (covering U.S. Federal, State and Local Governments and their Contractors)
- Global Business Partner Anti-Corruption Policy
- Global Travel, Entertainment and Expense Policy

We Compete Fairly and Comply With Antitrust and Competition Laws

It is in our best interests to compete on a level playing field with free and open competition. We focus on and truthfully emphasize the merits of the products and services we sell. We accurately depict or describe competing products or services. We compete vigorously and do not engage in anti-competitive practices, such as:

- **entering** into any agreement, or otherwise consenting, even informally or orally, with a competitor to fix prices, allocate products, sales territory or suppliers;
- **agreeing or discussing** with a competitor whether or not to bid on a contract or the price or terms of a bid;
- **exchanging or discussing** with competitors any information about prices, marketing, customers, bid proposals or markets or other information that could affect Anixter's or its competitors' ability to conduct business independently or attending meetings where such topics are discussed;
- **entering** into an agreement with customers or suppliers that establishes the resale price of a product without the approval of our Legal Department; or
- **compelling** a customer to purchase one product in order to be able to purchase another product.

Such practices are prohibited by antitrust or competition laws in the U.S. and throughout the world and violations can result in severe penalties for businesses and individuals. Consult with the Legal Department before discussing these topics with competitors or when in a situation that could raise an antitrust or competition law issue.

Q At trade shows, I see many people I know who work for Anixter's competitors. What do I need to do to avoid running into legal trouble?

A Trade shows and industry group meetings require extra caution. Whenever coming in contact with competitors of Anixter, be sure to avoid discussing pricing or terms of Anixter's contracts or giving or receiving any competitive information. Even jokes about work-related topics can be misinterpreted. If there is ever a discussion of any anti-competitive topics, you should leave the conversation immediately.

Q&A

RESPECT FOR GOVERNMENTS

As a global company, Anixter conducts business worldwide. This requires us to interact with officials, employees and agencies of governments around the world. We comply with applicable laws of the countries in which we do business, including anti-corruption laws, international trade laws and anti-money laundering laws.



We Do Not Make Prohibited Payments to Public Officials

We comply with all anti-bribery and anti-corruption laws in countries where we operate or do business. These include, but are not limited to, the U.S. Foreign Corrupt Practices Act which applies to all Anixter businesses and employees worldwide, and the UK Bribery Act, which applies to any individual or business with a connection to the United Kingdom, wherever they are located.

We do not offer, promise or authorize the payment of bribes to any government official or employee. We do not make facilitation payments, which are typically small payments made to an individual to speed up routine government actions. We know public officials throughout the world are usually prohibited from accepting any gift, favor or entertainment, and we do not offer or provide anything of value to a public official.



WHAT IS A PUBLIC OFFICIAL?

- *Anyone working for:*
 - *governments at national, state, local or any other levels*
 - *government agencies or public authorities*
 - *state-owned or state-controlled enterprises*
 - *groups with special status (e.g. Native American tribes in U.S.)*
 - *international public organizations (e.g. UN or EU)*
- *Politicians at any level of government, political candidates and political parties*
- *Members of royal or ruling families*

We do not seek to influence the judgment or acts of any public official by promises of gifts or loans or by any other unlawful inducement. We do not do anything indirectly that we would be prohibited from doing directly, and we take steps to ensure that our business partners who may deal with public officials on our behalf do not offer, promise or authorize prohibited payments.

We require our business partners to follow our Global Business Partner Anti-Corruption Policy and applicable laws and confirm they are not included on any prohibited party list. If we believe that a business partner or anyone else acting on our behalf may be making an improper payment to a public official, we immediately report it to a compliance officer or the Legal Department.

Q I am looking to hire a consultant who will assist us in getting permits in a foreign country. The consultant is seeking a large sum of money and is refusing to sign any paperwork. What should I do?

Q&A

A *We must take active steps to be sure our payments will not be used to bribe a government official. You should contact the Legal Department for advice prior to engaging this consultant.*



For more information, please see our:

- Global Anti-Bribery Policy
- Global Government Contracts Policy (covering U.S. Federal, State and Local Governments and their Contractors)
- Global Business Partner Anti-Corruption Policy
- Global Travel, Entertainment and Expense Policy

We Comply with International Trade Laws

As a global company, Anixter imports and exports products around the world. We understand there are multiple laws that restrict trade in certain products and with certain embargoed or otherwise restricted countries, persons and entities. We comply with all applicable export and import laws. The export control laws also limit the exchange of certain technical information, including exchanges by e-mail and/or Web access. We ensure every import, export and re-export of goods, services or technology complies with applicable laws and has received any required licenses or other government authorizations.

We understand that trade restrictions and boycotts may restrict us from doing business or exchanging information with certain countries, entities and persons and we take steps to properly screen all parties against applicable restricted party lists. We also know that certain products may be subject to special restrictions and require appropriate licenses prior to exporting. We contact Anixter's International Trade Compliance Officer ("ITCO") or our Legal Department prior to engaging in any activity that may have international trade concerns.

We also comply with U.S. anti-boycott laws that prohibit us from participating in or cooperating with any foreign boycott or other restrictive trade practices that are not approved or sanctioned by the U.S. government. Under these laws, we may not provide information to customers or others about the race, religion, sex or national origin of Anixter's owners, employees, suppliers or shippers, except in compliance with the legitimate affirmative action programs of Anixter or its U.S. customers or as otherwise approved in advance by our Legal Department. We may not provide information about relationships or business dealings that Anixter may or may not have with boycotted or "blacklisted" countries.

Because Anixter must report all requests to participate in a boycott, even if Anixter refuses to participate and provides acceptable language, we must forward any requests we receive to the ITCO or our Legal Department. Such requests can be written or verbal, and are sometimes difficult to identify, but may be found in business documents, such as contracts, bids, letters of credit, purchase orders and questionnaires.



WE SEEK THE ASSISTANCE AND APPROVAL OF OUR ITCO OR OUR LEGAL DEPARTMENT IF ANY DOCUMENT WE RECEIVE:

- *Contains the words "boycott" or "blacklist",*
- *Prohibits the import or export of goods from or to certain countries,*
- *Requires that goods not be shipped via ports of particular countries, or*
- *Contains any other language that may be related to a boycott.*



For more information, please see our:

- Export Compliance & Procedures Manual
- Export Compliance Summary Quick Guides

Additional information regarding these policies and International Trade Compliance is accessible through your local Ethics and Compliance intranet sites.

We Comply with Anti-Money Laundering Laws

Money laundering involves concealing illegal funds or trying to make those funds look legitimate. We comply with all laws that prohibit money laundering. When we suspect money laundering activities, we report it.

CONTACT A COMPLIANCE OFFICER WHEN REQUESTED TO:

- *Make payments in currencies other than as previously agreed or typical*
- *Make or receive payments in cash*
- *Make or receive payments to or from someone not a party to the transaction, or*
- *Make or receive overpayments.*

We Do Not Use Anixter Resources for Political Activities and Contributions

We understand that Anixter respects our rights to participate in the political process and to engage in our choice of political activities. We make it clear that our views and actions are purely our own and not those of Anixter. We do not use Anixter resources, property, time or funds, nor do we seek reimbursement to support political parties, causes or candidates. Corporate contributions of any kind to a candidate, political party or political committee may be regulated, so we must have the approval of our Legal Department before making any corporate political contribution.



RESPECT FOR OUR SHAREHOLDERS

We act like owners of Anixter and make decisions accordingly. We create and sustain value for our shareholders by always acting in the best interest of Anixter. We protect Anixter's assets and confidential information, maintain accurate business records, ensure timely and accurate financial reporting, avoid conflicts of interest and communicate through proper channels.



"ANIXTER'S BUSINESS IS YOUR BUSINESS." - THE ANIXTER BLUE BOOK

We Protect Anixter's Assets

We are entrusted with Anixter's assets in order to do our jobs, and we treat those resources with respect. We protect these assets from misuse, loss, damage or theft. We use Anixter's assets for proper business purposes and only as allowed by Anixter. We do not engage in personal activities that interfere with or prevent us from fulfilling our job requirements during work hours.



"JUST PRETEND THAT THE COMPANY'S MONEY YOU ARE SPENDING IS YOUR OWN. IT'S YOUR COMPANY." - THE ANIXTER BLUE BOOK

We take necessary security precautions to protect Anixter's assets and prohibit unauthorized access to Anixter's computer systems. We abide by the policies and guidelines of our Corporate Information Security Group. We do not use Anixter's equipment excessively for personal use or for accessing, storing or distributing any content that is illegal, harassing or offensive. We immediately report any situation involving fraud, theft or improper use of Anixter's assets, and understand Anixter prosecutes to the fullest extent allowed by law.

Q I want to report a situation relating to fraud, theft and/or improper use of Anixter's assets, but I don't want to get another employee in trouble. What should I do?

A *In order for management to address issues, it must be aware of them in the first place. As stated earlier in this Ethics Policy, anonymous reporting of potential violations of our Ethics Policy is available through our Business Integrity Line. Please remember that retaliation against any employee who reports or discloses violations of our Ethics Policy in good faith is prohibited.*



For more information, please see our:
– Information Security Policies and Guidelines

We Protect Anixter's Confidential Information

We understand Anixter's information and related resources are extremely valuable. We protect and keep private all proprietary and confidential information. We disclose such information only to those with a legitimate business need who are authorized to receive it or when required by law or permitted by our policies.

EXAMPLES OF CONFIDENTIAL INFORMATION:

- *business or strategic objectives, plans and outlooks*
- *pricing and cost information*
- *customer, supplier, business partner and employee lists*
- *marketing and sales plans or strategies*
- *business processes and procedures*
- *non-public financial data*
- *technical data and processes*
- *trade secrets*
- *wage and salary information*
- *competitive information*
- *merger, acquisitions or divestiture plans*
- *contracts and agreements*

We take necessary steps to protect confidential information, including executing appropriate confidentiality agreements prior to disclosure. We protect Anixter's confidential information by keeping it secure, and we avoid public discussions or displays of it. We are cautious when publicly talking with others or using cell phones, laptop computers and wireless devices, so others cannot overhear or view confidential information. We take care not to inadvertently disclose confidential information to family or friends. We continue to protect Anixter's confidential information even after our employment ends.

Q Can I reveal confidential information to another individual if he doesn't work for a competitor, and it's highly unlikely that he would share that information with anyone else?

Q&A

A No. We must keep private all confidential information even if the intended recipient is not a competitor or the likelihood of further disclosure is low.



For more information, please see our:

- Reaffirmation of Policy on Confidentiality
- Regulation FD Policy

We Maintain Complete and Accurate Business Records

We know that our shareholders rely on us to keep complete, accurate and reliable business records. We observe the most stringent standards in keeping financial and other records and accounts. Our books reflect all components of each transaction with honest, accurate and clear presentation of the facts. We never falsify or conceal information. We know that almost all business records including our e-mails, voicemails and letters could be subject to public disclosure. We do our best to be clear, concise and as accurate as possible, and we communicate so we would be comfortable if what we said or wrote were presented in the news or in court.

We are each responsible for doing our part to ensure Anixter's books, records and accounts accurately reflect the transactions and events that occur. We keep full, accurate and appropriate records for all transactions, including supporting documentation. We do not make incorrect or false statements in any books or records, our expense reports, time sheets, quality or safety records or any other business record. We also do not alter, conceal or destroy documents or records that are subject to an investigation, suspected investigation, official proceeding, or legal hold issued by the Legal Department.

Q&A

Q I received a legal hold from the Legal Department requiring that I preserve certain paper and electronic records and documents. If I believe that a document is subject to the legal hold, but is of little importance or value, can I delete or get rid of the document?

A No. All paper and electronic records and documents subject to a legal hold must be preserved until further notice.

Q A supplier has asked me to temporarily book an order for more product than we need so the supplier can report the revenue for this year. Is this ok?

A No. This would not properly reflect the actual transaction and would be contrary to our Ethics Policy. In addition, this could be assisting the supplier to commit fraud.



We Provide Timely and Accurate Financial Reporting

We know that our shareholders and the general public rely on us to provide timely and accurate information about our business and financial results. To ensure that the information we disclose in reports filed with the U.S. Securities and Exchange Commission or otherwise make publicly available is full, fair, accurate and timely, we observe the most stringent standards in keeping financial and accounting records and maintain and follow our system of internal controls and procedures. If we ever experience or witness violations of our Ethics Policy relating to financial, accounting, auditing or disclosure matters, we report it. We prohibit any form of retaliation against any employee who reports or discloses violations of our Ethics Policy in good faith or acts as a witness.

We Avoid Conflicts of Interest

We always act in the best interest of Anixter and our shareholders and avoid any situation that may tempt us to act contrary to Anixter's best interests. We avoid even the appearance of a conflict of interest. We do not use our position, contacts or knowledge about Anixter for personal gain, nor do we compete with Anixter or take any Anixter opportunity for personal gain. We do not allow personal or family relations or outside investments to influence or even appear to influence our business decisions. If we are ever in a position where a personal or family relationship or an investment could create the appearance of a conflict of interest, we immediately disclose the situation to our manager or our Legal Department.

If we have a job where we could influence or control Anixter's actions in dealing with certain companies, we do not invest in those companies or we properly disclose our investment to our Legal Department or a compliance officer. We may be asked periodically to disclose our investment in or connection with companies with which Anixter does business. We avoid outside business activities that could interfere with our ability to perform our job.

EXAMPLES OF POSSIBLE CONFLICTS OF INTEREST:

- *Having outside employment or other activities that are so demanding that they interfere with our ability to do our job.*
- *Doing business with or competing against an organization that employs or is partially owned by family or friends. Buying or selling for our own account from or to Anixter or any entity seeking to do business with Anixter.*
- *Receiving a commission, share of profits or any other payment, a service or any excessive gift or entertainment from anyone doing business with or seeking to do business with Anixter.*

The best way to avoid an embarrassing conflict of interest situation is to fully disclose the facts to a manager, the Legal Department or a compliance officer prior to any transaction.



Q I need to get a part-time job in addition to my Anixter job. Is this a problem?

A It is generally not a problem as long as your other job is not with a company that could be a competitor to Anixter and as long as the other job does not affect your ability to do your work with Anixter.

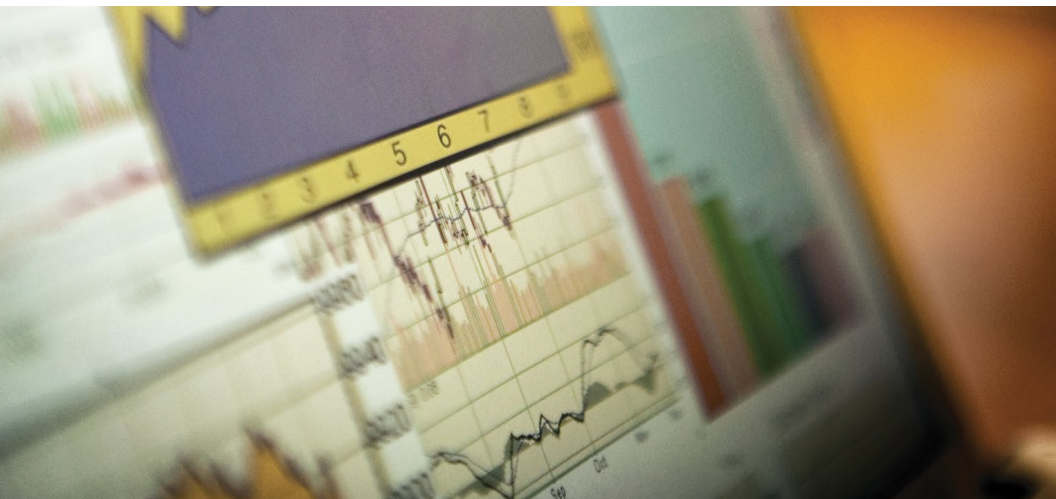
Q My spouse is an employee at a company that does business with Anixter. I have recently been promoted, and in my new job, I will be in contact with my spouse's company from time to time. What should I do?

A You should contact your manager, the Legal Department or a compliance officer for guidance. It is important that any potential conflicts be disclosed so we can anticipate and avoid issues.



For more information, please see our:

- Global Anti-Bribery Policy
- Global Government Contracts Policy (covering U.S. Federal, State and Local Governments and their Contractors)
- Global Business Partner Anti-Corruption Policy
- Global Travel, Entertainment and Expense Policy



We Follow Proper Policies when Communicating with the Media, our Shareholders and the Public

To ensure that communications regarding our business to the media, our shareholders and the general public are accurate and presented in a consistent manner, we do not speak on behalf of Anixter unless we are specifically authorized to do so. If we receive an inquiry from a shareholder, investor, market analyst or other member of the financial community, we refer the inquiry to our Chief Executive Officer, Chief Financial Officer, General Counsel or the Vice President of Investor Relations. If any media representative or other third party requests an interview or seeks information or opinions about an Anixter-related matter, even if the matter is not confidential, we refer the request to our Chief Executive Officer, Chief Financial Officer or General Counsel. These employees have access to full and complete information and the training to respond appropriately.

Q I received a call from a reporter at a trade magazine asking me to comment on the expansion of our business in developing countries. Can I speak to the reporter?

Q&A

A No, you should not comment unless you are specifically authorized to speak on behalf of Anixter. You should refer the call to someone who is authorized to speak on behalf of Anixter.



For more information, please see our:

– Regulation FD Policy

We Do Not Trade on Insider Information

In the course of our work, we may become aware of important information about Anixter or other companies that is not available to the general public. We do not trade Anixter's securities or other companies' securities while in possession of material non-public information, nor do we disclose material non-public information to other persons, such as relatives or friends, who may trade securities on the basis of the information. Material non-public information is any information not generally known or available to the general public that a reasonable investor would consider important in deciding whether to buy, sell or hold a security. Material non-public information may include news about:


- earnings, financial results or projections that have not yet been publicly disclosed,
- potential acquisitions, mergers, divestitures or investments,
- management changes,
- potential sale of significant assets,
- declaration of stock splits or dividend policy changes,
- significant new products or services,
- the gain or loss of a substantial customer or supplier, or
- actual or threatened significant lawsuits or government investigations.

We understand either positive or negative information may be material and the information may be about Anixter or any other company. We do not engage in short-term speculation in Anixter securities nor in any transaction where we could profit if the value of Anixter's securities declines. If we are in doubt about a particular transaction, we consult with our Legal Department.

Q *Through my job, I am aware that sales have been very strong for Anixter this quarter. Can I advise my cousin to buy Anixter stock now before our earnings for the quarter are announced to the public in a few weeks?*

A *No. Buying or selling stock based on any material, non-public information (or passing this information along to, or "tipping," another person who trades on that information) not only violates our Ethics Policy, but is also illegal and can result in severe penalties, including sanctions, fines and civil and criminal penalties.*



 **For more information, please see our:**
– Insider Trading Policy
– Regulation FD Policy



RESPECT FOR OUR COMMUNITIES

We are privileged to do business in hundreds of communities around the world. We seek opportunities to improve the communities in which we do business and to protect the environment.



ANIXTER CARES IS OUR EFFORT TO HELP EMPLOYEES ENGAGE WITH THEIR COMMUNITIES AND GIVE SOMETHING BACK.

We Contribute to our Communities

We are pleased that Anixter believes in contributing to the society and communities in which we live and conduct business. All of us are encouraged to become active in our communities and to support causes that improve our communities.

In order to encourage and support our employees' efforts, we have implemented various ways to give and show that we care, such as:

- Matching gifts to the Red Cross
- Time off to volunteer at a nonprofit organization.



Anixter Cares

In addition to the core initiatives above, Anixter participates in a variety of other charitable causes including the American Cancer Society, Step Out for Diabetes and the Make-A-Wish Foundation. We have also raised money for cancer awareness across the world, donated toys to children locally and abroad and supported the opening of a new autism center in Asia.

We Safeguard and Protect the Environment

We promote and maintain environmentally responsible practices at our locations. Our Corporate Sustainability program seeks to continuously improve business processes to control and reduce the impact associated with our targeted environmental aspects of:

- Energy
- Waste
- Materials and natural resources
- Transportation.



By targeting measurable results within each environmental aspect combined with using our A Sustainable PathSM approach, which focuses on the economic, environmental and social impacts of the organization, we balance corporate social responsibility and return on investment.



DID YOU KNOW?

Anixter's 61,000-square-foot building annex next to its corporate headquarters in the Chicago suburb of Glenview has been built to the U.S. Green Building Council LEED® (Leadership in Energy and Environmental Design) specifications. Once officially LEED certified, the Glenview annex will become Anixter's third North American facility to obtain certification to LEED standards. Anixter obtained LEED Silver certification for its 195,000-square-foot Edmonton, Alberta, facility in 2011 and the 457,000-square-foot Alsip, IL, building was LEED certified in 2007.

Anixter has implemented global recycling programs that will divert more than 776,000 lb. of cardboard, wood, metal, plastic, paper and other mixed recyclables from landfills annually.

Anixter's Willebroek, Belgium location uses rooftop solar panels to power more than 50 percent of its 142,000-square-foot building.

We know that the health of our business is tied to the health of the communities within which we work and live. We comply with all applicable environmental laws wherever we operate.

CONTACTS



Questions, Concerns or Reporting

Anyone with a concern or question about the Ethics Policy or anyone who is aware of conduct that may violate our policies should talk to any Anixter manager. If this is not possible, or is uncomfortable, contact our Human Resources, Internal Audit or Legal Departments, or one of our compliance officers. You may also anonymously bring up any concern by contacting the Anixter Business Integrity Line anixter.ethicspoint.com. Calls to the anonymous Anixter Business Integrity Line are answered by an independent third party. Translation services are available. The caller's identity is not provided to Anixter. Reports can be made online or by telephone. All issues will be taken seriously and will be investigated promptly with appropriate action taken.



Remember, Anixter will not tolerate any retaliation or harassment against anyone who raises a good faith concern or reports any misconduct.



“INTEGRITY IS DOING THE RIGHT THING, EVEN IF NOBODY IS WATCHING. WE WOULD RATHER LOSE MONEY, A CUSTOMER, A SUPPLIER, OR AN ORDER THAN VIOLATE OUR ETHICS POLICY, OUR INTEGRITY, OR THE LAW.” - THE ANIXTER BLUE BOOK

For Questions or Concerns

E-Mail: ethics@anixter.com

Fax: U.S. Access Code + 224-521-8604

Mail: Chief Compliance Officer
Anixter Inc.
2301 Patriot Blvd.
Glenview, IL 60026

Integrity Line: To access the Business Integrity Line, find specific country call-in numbers or submit an anonymous report online, go to **anixter.ethicspoint.com**.

Contact a Compliance Officer

To find the list of current compliance officers, see “Compliance Officers” on your local Ethics and Compliance intranet site.



RESPECT

INTEGRITY



Build. Connect. Power. Protect. Services. Worldwide.

Anixter Inc. World Headquarters

2301 Patriot Boulevard
Glenview, Illinois 60026
224.521.8000

About Anixter: anixter.com/aboutus

Legal Statement: anixter.com/legalstatement

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