



May 2024

## **Anti-Human Trafficking And Slavery Statement**

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This statement has been prepared by Victaulic for 2023 pursuant to the California Transparency in Supply Chains Act, the U.K. Modern Slavery Act, and Canada's Bill S-211 (Modern Slavery Act). This statement describes our modern slavery compliance measures for the global group of Victaulic Company and Victaulic International, BV, and its affiliates (collectively, "Victaulic"). Victaulic is opposed to all forms of slavery and human trafficking, including forced labor and child labor, and is committed to working to prevent the risk of any occurrence in our operations and supply chains.

### **Business Structure, Operations, and Supply Chains**

As a global company with more than 5,500 employees and 50 facilities worldwide, Victaulic helps customers in 140 countries succeed in the global construction industry. Using a vertically integrated strategy for manufacturing and a buy where we make, make where we sell approach, Victaulic maintains a global network of trusted local suppliers. Victaulic products go to market through our distribution partners and via direct-to-customer sales.

### **Ethics and Compliance**

Victaulic is committed to ethics and integrity in all we do. Victaulic is committed to ensuring that its management, employees, and suppliers take appropriate steps to mitigate the risk of human rights violations occurring in all aspects of our supply chain. We maintain a broad-based and robust corporate ethics and compliance program designed to ensure compliance with applicable global laws and directives that govern our business. Our compliance program also helps ensure transparent and ethical business practices across our business partners. We periodically review and propose enhancements to our compliance program, as well as the types of training and awareness we provide to our employees and suppliers, to ensure continued relevancy and effectiveness.

### **Internal Accountability**

Victaulic requires new employee training and annual training for all employees on our Code of Conduct, which includes prevention of human trafficking and forced labor. Employees must certify they understand and will adhere to the Code of Conduct. Additionally, a quarterly Compliance newsletter with current training materials is provided to employees and always available on our employee intranet. We periodically refresh our training to ensure continued adherence to applicable laws and regulations.

Victaulic prides itself on our industry-leading culture of safety and is committed to providing a workplace that is safe and secure, where employees are treated with respect and are free from harassment and discrimination. In the interest of protecting human rights across our operations, our global Freedom of Association Policy governs employees' rights to representation and requires the same standard of care from our supply chain partners.



Employees found to be in violation of our Code of Conduct or compliance policies are subject to discipline, up to and including termination. Any Victaulic sites or operations found to be in violation of our policies for the protection of universal human rights will undergo appropriate corrective action, including, but not limited to, any actions required under applicable laws and regulations, and mitigation of any negative impacts to affected individuals and their families.

### **Supplier Due Diligence and Compliance**

Victaulic requires all suppliers to act with ethics and integrity. Victaulic has an established due diligence process for prospective and existing suppliers, which rests on a tiered system for risk assessment. Aligned with our risk assessment, supplier due diligence can include supplier questionnaires, onsite audits and inspections, third-party investigation reports, and verification of debarment and denied parties lists. Victaulic requires all suppliers as a condition of contract to agree that they will comply with all applicable laws and regulations and to certify that materials incorporated into their products comply with anti-human trafficking and modern slavery laws in the countries in which they do business. With respect to suppliers outside the United States, suppliers are required to comply with their local laws as well as applicable laws of the United States.

We assess our suppliers (including their subcontractors) for adherence to our comprehensive supplier policies, including our Supplier Code of Conduct which, among other things, sets out requirements relating to ethics and integrity, labor and employment practices, compliance with applicable law, and protecting human rights. The Supplier Code of Conduct requires suppliers to ensure that child labor is not used in the performance of work and to adhere to regulations prohibiting modern slavery and human trafficking. We may terminate a contract or other agreement with a third party if we discover or suspect any misconduct contrary to our Code of Conduct

### **Reporting of Potential Violations**

We expect and ask our employees and business partners to raise concerns regarding potential violations of our Code of Conduct, policies, or law, including human trafficking or other modern slavery practices. We provide multiple reporting avenues, including anonymous submissions through our global Ethics Point [hotline](#) or online portal ([Victaulic.Ethicspoint.com](http://Victaulic.Ethicspoint.com)), and adhere to a strict non-retaliation policy. We investigate allegations of misconduct and take appropriate steps, including corrective action when allegations are substantiated.

### **Assessing Effectiveness**

Victaulic uses many tools to assess risk and the effectiveness of our policies and mitigation efforts. They include compiling and assessing data on the nature and number of complaints and the results of investigations into those complaints, internal and external audits (of both Victaulic and our supply chain), senior management and board oversight, among other controls. We will continue to review and enhance, as necessary, our efforts to prevent human trafficking and other misconduct within our business and global supply chain.



### **Continuous Improvement/Looking Forward**

We strive to constantly improve as a company and citizen of the communities and industries in which we operate and are actively working to fortify our supplier due diligence policies in accordance with the evolving social and legal landscape where we do business. The immediate steps in our continual improvement plan include implementing an improved and targeted training program for our sourcing group regarding relevant modern slavery topics.

For the purposes of compliance with the U.K. Modern Slavery Act, this Statement has been approved by the Board of Directors of Victaulic International BV and signed by the undersigned in his capacity as a director of that entity.

A handwritten signature in blue ink that reads "Joe Savage".

**Joe Savage**

Chief Compliance Officer

Executive Vice President and Chief Financial Officer, Victaulic Company

Director, Victaulic International, BV