



Anti-Human Trafficking and Slavery Statement

May 2026

This statement is prepared by Victaulic for the financial year ending 31 December 2025 pursuant to Section 54 of the U.K. Modern Slavery Act 2015, Sections 13 and 16 of the Australian Modern Slavery Act 2018 (Cth), Section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the California Transparency in Supply Chains Act (California Civil Code §1714.43).

This statement is structured in accordance with the optional International Reporting Template on Modern Slavery, Forced Labour and Child Labour jointly issued by the United Kingdom, Australia, and Canada in 2025.

This statement describes Victaulic's modern slavery compliance measures for the global group of Victaulic Company and Victaulic International BV and its affiliates as listed in Schedule A (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.

Section 1. Structure, Operations, Activities, and Supply Chains

Organization

Victaulic is a privately-held global manufacturer of mechanical pipe joining systems, couplings, fittings, valves, and flow control products. As of calendar year 2025, Victaulic operated more than 60 facilities worldwide and employed approximately 6,000 people, serving customers in over 140 countries. The company is headquartered in Easton, Pennsylvania, USA. The legal entities covered by this statement are listed in Schedule A.

Products and sectors served

Victaulic's products primarily serve the commercial construction, fire protection, water and wastewater, and industrial process markets.

Supply chain structure

Victaulic operates a vertically integrated manufacturing model under a "buy where we make, make where we sell" approach. Our global sourcing team prioritizes local suppliers at each manufacturing facility and pursues dual sourcing across purchasing segments where feasible. Victaulic products go to market primarily through distribution partners, and in select cases, through direct-to-customer sales.



Direct (Tier 1) supplier categories include raw metals, elastomers and gaskets, coatings, fasteners, packaging, and indirect materials and services. Direct suppliers are located across the regions in which Victaulic operates.

Supply chain visibility

Victaulic maintains direct contractual relationships with Tier 1 (direct) suppliers and applies risk-based due diligence to that population. Visibility into supply chain tiers below Tier 1 is more limited and is progressively addressed through ongoing supplier engagement.

Governance and consultation

Modern slavery risk management at Victaulic is led by the Compliance team in coordination with Sustainability, Global Sourcing, Human Resources, and Legal. Senior oversight is provided by the Executive Leadership Team through the Vice President of Global Internal Audit and Compliance.

Modern slavery compliance is governed at the parent-entity level in the United States, where all functions responsible for policy oversight and implementation reside. The entities listed in Schedule A operate under this centralized framework.

Section 2. Policies

Internal operating policies

Victaulic's [Code of Conduct](#) applies to all employees globally and addresses the prohibition of human trafficking, forced labor, and child labor; non-discrimination and non-harassment; freedom of association; safe and healthy working conditions; and the channels available to raise concerns. Employees must annually certify their understanding of and adherence to the Code of Conduct.

Victaulic's [Supplier Code of Conduct](#) applies to all suppliers and sets requirements relating to ethics and integrity, labor and employment practices, compliance with applicable law, and the protection of human rights. The Supplier Code of Conduct prohibits the use of child labor, forced or compulsory labor, and human trafficking in the performance of work for Victaulic, and requires suppliers to extend equivalent expectations to their own subcontractors.

Victaulic's [Freedom of Association Policy](#) governs employees' rights to representation and requires the same standard of care from supply chain partners.

Communication and enforcement

The Code of Conduct is communicated to employees during onboarding and reinforced through annual training, periodic topical training for targeted groups, and a quarterly Compliance newsletter. The Supplier Code of Conduct is incorporated into supplier onboarding and



contractual terms. Employees found to be in violation of our Code of Conduct or compliance policies are subject to discipline, up to and including termination. Suppliers found in violation of our Supplier Code of Conduct may be subject to corrective action requirements or termination of the supplier relationship.

Section 3. Risk Management Processes

Risk assessment approach

Victaulic completed a comprehensive risk-based double materiality assessment in 2025, which received external verification. The assessment evaluated risks across Victaulic's global operations and supply chain, including human rights and labor-related risks and in consultation with relevant internal and external stakeholders.

Risk assessments are reviewed and refreshed on a recurring basis to reflect changes in Victaulic's operational footprint, supplier base, and external risk environment. Risk assessment is owned by the Compliance and Sustainability teams in coordination with Global Sourcing, with senior management oversight.

Information sources

Risk identification draws on a combination of internal and external sources, including recognized international risk indices, supplier questionnaires and audits, third-party investigation reports, denied parties and sanctions screening, and engagement with value chain partners.

Areas of focus

Based on Victaulic's risk assessment, modern slavery risk in Victaulic's operations and supply chain is addressed across the following categories:

- Raw materials and components sourced from international supply chains, where direct visibility may be more limited beyond Tier 1 suppliers and where Victaulic continues to develop sub-Tier supplier engagement.
- Operations in jurisdictions whose regulatory and labor environments warrant heightened attention. At these operations, Victaulic applies enhanced due diligence and oversight consistent with applicable local laws.
- Workers in labor-intensive segments of the global supply chain whose vulnerability to exploitation is recognized in international frameworks.

Risk register and tiering

Victaulic's supplier due diligence applies a tiered risk model based on the product of the Transparency International Corruption Perceptions Index (CPI) score for the supplier's country



and Victaulic's level of spend with that supplier. Suppliers are assigned to one of four risk bands, with escalating due diligence requirements applied to higher-risk segments. This model is updated annually to reflect the most recent CPI scoring and Victaulic's current spend profile.

Section 4. Due Diligence and Remediation

Supplier due diligence framework

Victaulic operates an established due diligence process for prospective and existing suppliers. Aligned with our risk-based tiering, supplier due diligence includes:

- Supplier questionnaires covering ethics, labor, human rights, and compliance topics;
- Onsite audits and inspections at higher-risk suppliers;
- Third-party investigation reports and adverse media screening;
- Verification against debarment, denied parties, and sanctions lists;
- Contractual requirements that suppliers comply with all applicable laws and regulations, including anti-human trafficking and modern slavery laws in the countries in which they operate.

Supplier risk screening, engagement, and data management are supported by Diligent Third-Party Manager, which facilitates collection and management of supplier due diligence data.

Suppliers are assessed for adherence to Victaulic's comprehensive supplier policies, including the Supplier Code of Conduct. Victaulic may terminate a contract or other agreement with a third party if Victaulic discovers or suspects any activities that violate the Code of Conduct or Supplier Code of Conduct.

Human rights due diligence approach

Victaulic's approach to human rights due diligence is aligned with international standards: identifying and assessing actual and potential adverse impacts; integrating findings into management systems; preventing and mitigating impacts; tracking implementation; and communicating outcomes. Victaulic continues to align its due diligence framework to applicable standards as the regulatory landscape evolves.

Grievance mechanisms

Victaulic provides multiple reporting avenues for employees, suppliers, contractors, and other stakeholders to raise concerns regarding potential violations of the Code of Conduct, policies, or applicable law, including human trafficking or other modern slavery practices. These include direct reporting to managers and Human Resources, and anonymous submissions through Victaulic's global [Ethics Point hotline](#) or online portal at Victaulic.Ethicspoint.com, available in



more than 100 languages. Victaulic adheres to a strict non-retaliation policy. Allegations of misconduct are investigated and corrective action is taken when allegations are substantiated.

Remediation framework

In the event Victaulic identified an instance of forced labor, child labor, or human trafficking in its operations or supply chain, Victaulic's response would include (as appropriate to the circumstances): immediate corrective action; engagement with the relevant supplier or operational unit to investigate and implement corrective and preventive actions; consideration of remediation for affected workers; notification to relevant authorities where required by law; and reassessment of supplier or facility-level controls and, where warranted, termination of supplier relationships.

Incidents identified during the reporting period

In 2025, Victaulic identified no instances of forced labor or child labor in its operations or supply chain. As a result, no remediation measures were taken. No vulnerable populations experienced loss of income as a result of steps that Victaulic has taken to eliminate forced or child labor risks, and no financial remediation measures were taken to address such loss of income.

Section 5. Training

Code of Conduct training

Victaulic's Code of Conduct training is mandatory for all new employees and is completed annually by all employees globally. The training addresses prevention of human trafficking, forced labor, and child labor among other topics. The annual training reaches all employees globally with a 98% completion rate across Victaulic's five global regions (APAC, Canada, EMEA-I, Mexico-Latin America, USA). Employees must certify their understanding of and adherence to the Code of Conduct upon completion.

Supplemental training and communications

A quarterly Compliance newsletter, distributed to employees and available on the employee intranet, provides ongoing communications and refresher materials on compliance topics, including modern slavery, corruption, harassment, and ethical business conduct. Additional supplemental training is delivered to targeted groups as needed and in alignment with incidents or findings. Training materials combine internally and externally developed content and are periodically refreshed.



Section 6. Assessing Effectiveness

Approach

Victaulic assesses the effectiveness of its modern slavery prevention efforts on a continuous basis. Effectiveness is evaluated through a combination of training completion data, supplier engagement and audit outputs, internal and external audits, review of allegations raised through Victaulic's grievance mechanisms, third party monitoring and due diligence reports, and senior management oversight.

Indicators monitored

Indicators relevant to assessing effectiveness include training completion across the workforce, supplier adherence to the Supplier Code of Conduct, completion of supplier audits, screening against denied parties and sanctions lists, and the disposition of allegations raised through grievance mechanisms.

Governance

Effectiveness assessment is owned by the Compliance team in coordination with Global Sourcing, Global Supplier Quality Assurance, and Human Resources, with senior management oversight. Findings inform updates to Victaulic's policies, procedures, training content, and supplier due diligence framework.

Section 7. Other Relevant Information

Year-on-year progress

During the reporting period, Victaulic completed its risk-based double materiality assessment with external verification, refreshed its Code of Conduct and associated training program, and continued targeted training for its global teams. Victaulic's supplier due diligence framework continues to be refined consistent with the tiered risk model described above.

Challenges

As with most global manufacturers, achieving comprehensive visibility beyond Tier 1 suppliers remains a challenge that Victaulic addresses progressively. The pace of change in the regulatory environment for modern slavery and human rights due diligence requires sustained investment in compliance capability and supplier engagement.

Forward-looking focus areas

For the next reporting period, Victaulic's focus areas include continued enhancement of supplier due diligence processes, continued alignment with international standards and applicable



regulatory developments, continued workforce training and development on modern slavery topics, and continued progression of risk-based supply chain monitoring.

Section 8. Approval and Attestation

For the purposes of compliance with Section 54(6) of the U.K. Modern Slavery Act 2015, Sections 13 and 14 of the Australian Modern Slavery Act 2018 (Cth), Section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the California Transparency in Supply Chains Act, this Statement has been approved by the Board of Directors of Victaulic International BV, as the higher entity in a position to influence and control each of the reporting entities listed in Schedule A. The Statement has been signed by the undersigned in his capacity as a Director of Victaulic International BV.

Attestation pursuant to subsection 11(4) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act:

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for calendar year 2025.

A handwritten signature in blue ink that reads "Joseph M. Savage". The signature is written over a horizontal line.

Joseph Savage

Chief Compliance Officer

Executive Vice President and Chief Financial Officer, Victaulic Company

Director, Victaulic International BV

Date: **13 May 2026**



Schedule A- List of Subsidiaries and Affiliates

Victaulic Europe BV
Victaulic de Mexico S. de R.L. de C.V.
Victaulic Piping Products India Private Limited
Victaulic de Brasil Ltda.
Victaulic Malaysia Sdn. Bhd.
Victaulic Company of Canada ULC (NSULC)
Victaulic Hong Kong Limited
Victaulic Piping Products Dalian Ltd (PRC)
Victaulic Korea LLC
Victaulic Australia PTY, Ltd.
Victaulic Polska Sp. Z.o.o.
Victaulic España, S.L..

*The reporting entity also includes Dalian Bingshan Metal Technology Co, Ltd. (PRC), Zhejiang Victaulic-Tuwei Piping Equipment Company Limited (PRC), and DC Piping S.A., where an interest is held. Entities that are not under the direct or indirect control of Victaulic are excluded from the scope of this reporting requirement.

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