



Anti-Human Trafficking and Slavery Statement

Ethics and Compliance

Victaulic Company, including all its group companies (collectively, "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 trafficking and slavery from 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 U.S. and foreign laws 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. Employees found to be in violation of our Code of Conduct or compliance policies are subject to discipline, up to and including termination.

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 can include site evaluations 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 slavery and anti-human trafficking 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.

As part of our on-going diligence, Victaulic conducts periodic announced audits of our global suppliers. We assess our suppliers (including their subcontractors) for adherence to our comprehensive supplier policies and procedures, 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 Ethics Point hotline (1-866-842-2927) or online portal (Victaulic.Ethicspoint.com). We encourage reporting of concerns without fear of retaliation. 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.