

UK Modern Slavery Act Statement 2023

Pyrotek Incorporated ("Pyrotek") publishes this Modern Slavery Statement ("Statement"), pursuant to Section 54 of the Modern Slavery Act 2015 for the fiscal year ended 30 June 2023 ("FY23"). This Statement applies to Pyrotek and its wholly owned subsidiaries.

INTRODUCTION

Pyrotek is committed to good corporate citizenship and the highest ethical standards. To facilitate the fulfilment of these commitments, Pyrotek has established and maintains appropriate measures to safeguard against the occurrence of human rights abuses, modern slavery, and related human trafficking within its supply chain as well as within its own operations, as further detailed in this Statement.

BUSINESS AND ORGANIZATION

Pyrotek is a privately owned corporation headquartered in the United States. Pyrotek is recognized as a global engineering leader and innovator of performance improving technical solutions, integrated systems designs and consulting services for customers in the aluminum industry. Pyrotek sells its products and services globally, with operations on the ground in over 35 countries.

VALUES AND POLICIES

Pyrotek does not tolerate any form of modern slavery or human trafficking in any part of its business. Pyrotek is committed to tackling the risk of modern slavery from its supply chain and operations at a global scale. Pyrotek outlines this commitment and sets clear ethical standards for its employees, affiliated companies, and third-party suppliers through a policy framework.

Pyrotek's Code of Business Conduct and Ethics highlights Pyrotek's support and respect for human rights and outlines how Pyrotek is committed to acting ethically in all aspects of its business and to maintaining the highest standards of honesty and integrity. Pyrotek's approach is consistent throughout its operations globally. The Code of Business Conduct and Ethics applies to all Pyrotek employees around the world and provides a framework within which Pyrotek makes responsible behavior a natural part of its operations.

Pyrotek expects all organizations within its supply chain to adopt an equivalent approach in their operations. Pyrotek's <u>Supplier Code of Conduct</u> sets out clear expectations for suppliers and applies to all Pyrotek suppliers, vendors, and subcontractors. The Supplier Code of Conduct reflects Pyrotek's core values, ethical principles and Pyrotek's commitment to human rights. The Supplier Code of Conduct includes requirements for fair labor practices, human rights (including prohibition on child, forced or bonded labor), and social impacts (such as anti-bribery and corruption) as well as other sustainability issues. Pyrotek reserves the right to evaluate compliance with the Supplier Code of Conduct through supplier surveys and review of relevant documents and policies.

Pyrotek's Supplier Code of Conduct is set within a wider ethical framework, which includes Pyrotek's <u>Human Rights Policy</u> and <u>Child and Forced Labor Policy</u>. Pyrotek's Human Rights and Child Labor Policies



expressly prohibit Pyrotek employees from engaging in or supporting human trafficking, forced labor and child labor in connection with Pyrotek's business activities and reflect international standards and principles including the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights and

Pyrotek's <u>Sustainability</u> and <u>Procurement</u> Policies further outline Pyrotek's commitment to the highest ethical, environmental and quality standards in all procurement activities and require that suppliers and vendors uphold similar policies.

DUE DILIGENCE AND CONTRACTING

The actions that Pyrotek takes to reduce the risk of modern slavery in its operations and supply chains are driven by Pyrotek's due diligence and monitoring strategy.

Pyrotek's supplier relationships are governed by Pyrotek's Supplier Code of Conduct which includes an absolute prohibition on forced or bonded labor. Pyrotek reserves the right to terminate its contracts with any supplier who is found to be in breach of Pyrotek's Supplier Code of Conduct. Where appropriate, Pyrotek's principal agreements further require Pyrotek's business partners and suppliers to comply with all applicable laws that relate to their interactions with Pyrotek, including, but not limited to, modern slavery laws.

Pyrotek has further embedded checks for modern slavery in a due diligence process and has raised awareness of these issues with employees who manage the supplier vetting process. The due diligence process reflects the relative risk for potential suppliers and includes checks against global sanctions and enforcement databases (for example, OFAC and World Bank Debarment List) to identify risks including human rights abuses, human trafficking, and labor violations. Suppliers identified as medium or high risk are subject to further vetting and evaluation based on the specific supplier's circumstances.

Over the last year, Pyrotek has continued to monitor and safeguard against modern slavery and human rights abuses by undertaking an ongoing review of its supplier terms and conditions and internal policies, and providing training to employees on the updated policies as updates are completed. Led by Pyrotek's Global Sustainability Team, Pyrotek has also committed to formalizing its approach to measuring environmental and social Key Performance Indicators in an effort to better understand the implications of its business activities, relationships, and operations. In doing so, Pyrotek seeks to further emphasize and incorporate environmental and social considerations in its decision making.

EFFECTIVENESS AND TRAINING

Pyrotek believes its efforts to date as outlined in this statement have been appropriate in helping prevent modern slavery and human trafficking from entering its supply chains.

Pyrotek continues to conduct periodic web-based trainings for employees to emphasize the importance of acting with integrity in line with Pyrotek's Code of Business Ethics. Pyrotek also provides training on



slavery and human trafficking to the global Pyrotek procurement team responsible for sourcing and contracting with Pyrotek suppliers.

Pyrotek fosters a culture of transparency and encourages all employees to raise concerns, including potential violations of company policies and applicable laws. Pyrotek does not tolerate any form of retaliation for raising concerns in good faith, asking questions, or participating in an investigation. Pyrotek's Whistleblower Policy provides employees with various means by which they can raise concerns. This includes escalation to human resources, senior management, or confidential reporting to Pyrotek's legal department. In addition to the foregoing, over the last year, Pyrotek has also begun the process of implementing an anonymous reporting hotline for employees and/or outside third parties to raise concerns, including any concerns related to modern slavery or human rights abuses.

To date, Pyrotek has not received any complaints from employees, or third parties related to concerns about modern slavery.

APPROVAL

The statement has been approved by Pyrotek's President.

Don Ting President

Date: July 31, 2023

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