



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published pursuant to the requirements under section 54 of the UK Modern Slavery Act 2015 and the California Transparency in Supply Chain Act of 2010. It provides information regarding the business practices of Red Lion Controls, Inc., including its affiliate companies (“RLC”) and the steps RLC has taken to ensure modern slavery and human trafficking (“MS&HT”) is not taking place in its business and supply chains.

RLC has a zero-tolerance approach to any form of modern slavery or human trafficking. It is committed to acting ethically, with integrity and transparency in all business dealings and it is committed to implementing effective systems and controls to safeguard against any form of MS&HT in any part of its business or operations. RLC considers that the risk of MS&HT taking place within its business or supply chain is relatively low and to date we have not uncovered any evidence of MS&HT within our business operations.

### OUR BUSINESS STRUCTURE AND SUMMARY OF OUR OPERATIONS AND SUPPLY CHAINS

Red Lion Controls manufactures a variety of industrial control products, from timers and counters to complex man-machine interfaces and has the latest surface mount and chip-on-board production capabilities. Red Lion's engineering team provides new product design both for a wide range of standard control products and as well as custom and OEM requirements.

We recruit, develop, and promote our people based on their talent, commitment and achievement; we strive to ensure that everyone is treated equally and fairly whatever their race, color, religion, national origin, gender, sexual orientation, age, disability or background. RLC is a very specialized and technical business, and we rely on the skills and expertise of our people, many of whom are highly qualified engineers and technicians.

RLC has high standards of business conduct applicable to the whole organization. We govern the actions of our company and employees and hold them to the highest level of ethical and social accountability. Our goal is to work with suppliers who embrace and comply with the same principles as our own.

RLC places high priority on compliance with the legislative and ethical requirements of the countries in which we operate, particularly with respect to employment practices, labor rights and equal opportunities.

### POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING

Although RLC does not have a specific MS&HT policy, it has other policies and procedures in place which address its MS&HT compliance requirements and standards. Wherever possible RLC uses a standardized sourcing agreement which includes key principles and values expected of suppliers. The standardized sourcing agreement is then tailored to specific laws governing the jurisdictions in which the RLC group companies operate.

Code of Business Ethics: Our Code of Business Ethics makes clear to employees the actions and behaviors expected of them when representing the organization. Our Code



was updated in 2020 and includes specific safeguards against MS&HT. The Code also includes a robust approach to anti-bribery and corruption. The organization strives to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing its supply chain. We make our suppliers aware of the principles within the Code of Business Ethics and the standards we expect of them.

Recruitment Policy: We operate a robust recruitment policy, including conducting checks on eligibility to work to safeguard against MS&HT.

Speak Up Policy: We encourage all workers, suppliers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of the organization. This includes any circumstances that may give rise to an enhanced risk of MS&HT. The organization's Speak Up procedure is set out in Our Code of Business Ethics and is designed to make it easy for workers to make disclosures, without fear of retaliation.

## SUPPLY CHAIN MANAGEMENT POLICY

In addition to the above, our Supply Chain Management Policy outlines the requirements we have of our suppliers which include a commitment to:

- Uphold and demonstrate high standards of integrity, governance and business practice;
- Not employ workers under the school leaving age of the country of employment (other than in genuine apprenticeships);
- Not use forced or illegal immigrant labor (including modern slavery and human trafficking);
- Provide working conditions which meet RLC's high standards on health, safety, hygiene and environmental practices;
- Pay wages and benefits which meet or exceed National Living Wage minimum requirements and adhere to working time regulations where applicable;
- Comply with RLC's standards and procedures in relation to anti-bribery and corruption;
- Not deny access to, or apply unfairly, a transparent grievance procedure;
- Not use any form of unlawful discrimination, harassment, abuse or bullying;
- Not knowingly procure specified metals that originate from facilities in conflict regions as metals should be certified as "conflict free";
- Be equally demanding of their suppliers and be able to demonstrate compliance to all of the aforementioned requirements; and
- Provide equal business opportunities for diverse suppliers.

## DUE DILIGENCE AND RISK ASSESSMENT

RLC screens and monitors its critical and key suppliers on an ongoing basis through a risk mitigation tool to ensure that its supply chain is free of bad actors. We also require our critical and key suppliers to sign contracts with commitments to prevent MS&HT in their own supply chains and operations. Our terms and conditions of purchase also contain provisions prohibiting such activities.



## FUTURE STEPS/ ANY OTHER ACTIONS

As part of our commitment to improving our procedures to identify and prevent MS&HT, we review all activities annually to determine ways to enhance our practices and maintain vigilance against MS&HT.

## APPROVAL

This statement has been examined and approved by the Board of RLC on February 20, 2024.

Marcel van Helten  
President

Mike Evelhoch  
VP, Treasurer

Jennifer Prisco  
VP, Corporate Secretary