

## **UK Modern Slavery Act Anti-Slavery and Human Trafficking Statement**

The U.K. Modern Slavery Act of 2015 requires businesses to provide disclosures concerning their efforts, to address slavery and human trafficking in their supply chains. Similarly, the Federal Acquisition Regulation provisions 52.222-50 and 52.222-56, and the California Transparency in Supply Chains Act of 2010, are aimed at removing slavery and human trafficking from the U.S. supply chain.

Tycon Systems Inc. (collectively, “**TyconSystems®**”, “**Company**”, “**we**” or “**us**”), considers it critical to use good judgment, to make ethical choices with integrity. We are committed to ensuring that all forms of modern slavery, including forced, compulsory labor and human trafficking, are excluded from our business and supply chain. Our business partners are expected to act in accordance with the highest standards of integrity and in compliance with all applicable laws and regulations. This Anti-Slavery and Human Trafficking Statement (“**Statement**”) addresses these statutes, rules and regulations and our commitment to the prohibition of slavery and human trafficking.

We recognize that slavery and human trafficking can occur in many forms, including forced labor, child labor, domestic and indentured servitude, sex trafficking, and workplace abuse. Therefore, the terms “*slavery and human trafficking*” as used in this Statement includes these various forms of coerced labor.

### **Our Supply Chain**

Tycon Systems® purchasing organization is responsible for supplier selection, contract negotiations and supplier performance. Members of this team have global responsibilities and oversight of Sourcing. They also oversee domestic day-to-day buying activities.

Our relationships with our suppliers are crucial to the long-term success of our organization. During the initial evaluation phase and on an ongoing basis, we consider suppliers’ records and goals when evaluating supplier relationships.

Our supply chain is complex, and there are limits to visibility beyond the first tier of suppliers. However, we strive for more complete traceability and transparency throughout our global supply chain.

Tycon Systems® verifies product supply chains through multiple methods, including denied parties lists, among others. We participate in and encourage active involvement in external organizations that assist with supply chain diligence, management and verification processes. We require as a condition of contract that all suppliers agree to comply with all applicable laws and regulations.

### **Our Relevant Policies**

Tycon Systems® has established policies to address modern slavery and human trafficking:

1. [Code of Business Conduct and Ethics](#) sets out the legal and ethical standards of conduct with which Tycon Systems® requires its personnel to comply. Amongst other things, it sets out our commitment to honest, ethical and fair working practices and prohibits the use of child labor, bonded labor, involuntary servitude or forced labor.

2. [Environmental, Social and Governance, and Human Rights Policy](#) all Tycon Systems® business partners, including suppliers, are expected to comply with the principles described therein, including upholding human rights, supporting the elimination of slavery and working against corruption in all its forms.
3. [Workplace Labor Rights Policy](#) demonstrates our commitment to maintaining safe and inclusive workplaces that are based on recognized human rights, including the UN Guiding Principles on Business and Human Rights and Universal Declaration of Human Rights.
4. [Our Code of Supplier Conduct](#) reflects our commitment to our values and our expectation that all of our suppliers will adhere and embrace such values. It includes a commitment that all suppliers should ensure that all forms of modern slavery, including forced, compulsory labor and human trafficking, are prohibited and that they maintain safe and inclusive workplaces, based on recognized human rights. Tycon Systems® further requires that suppliers act with reasonable diligence to ensure that any of their contractors, subcontractors, manufacturing facilities, labor providers, agents, partners, or subsidiaries, also comply with the principals, policies, and requirements expected of our suppliers.

We may terminate our relationship with any person or organization that does not comply with the above policies.

#### **Our Accountability Standards and Procedures**

To prevent slavery and human trafficking in our business and supply chain we have implemented internal accountability standards and procedures.

**Risk Assessment.** We undertake a periodic risk assessment of our supply chain to better understand the potential risks related to slavery and human trafficking. These assessments help us understand where human rights and labor issues may exist within our global supply chain so that we can prioritize and focus our responsible sourcing efforts.

**Employee Reporting.** Tycon Systems® maintains whistleblowing procedures and anti-retaliation policies in order to empower and encourage employees to raise any concerns regarding compliance with this Statement, or any other concerns, without fear of retaliation. If any violation involves suppliers, appropriate action, up to and including termination of contracts, will be undertaken.

#### **Our Effectiveness and Plans for Further Development**

Tycon Systems® evaluates slavery and human trafficking risks as part of some of our audits conducted by our quality team. We will continue to review, reassess, and further develop our anti-slavery and human trafficking plans, not only to ensure compliance with the law but also to ensure that we fulfil our core values as expressed in this Statement.

Collectively, this Statement, the policies, processes, and procedures described herein, are all designed to ensure that Tycon Systems® and its suppliers at every level are committed to maintaining a workplace and supply chain free of slavery and human trafficking.

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Bruce Sutton  
CEO, Tycon Systems Inc.