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1. Overview.

1.1 Introduction

Techtronic Industries Company Limited and its majority-owned or -controlled subsidiaries and affiliates throughout the world (“TTI Group” or “the Company”) recognizes that communities, economies and businesses thrive when workers’ rights are protected. Treating workers of all types (e.g., employee, contract, student, migrant, temporary and others) with dignity and respect is a fundamental component of the Company’s commitment to acting as a good corporate citizen. Specifically, this Policy Against Modern Slavery (“Policy”) reflects TTI Group is committed to a work environment free from forced labour, unlawful child labour, indentured labour and the illegal movement of people for the purpose of modern slavery or sexual exploitation (“Modern Slavery”).

As a leading manufacturing company, we seek to ensure that TTI Group employees, as well as TTI Group business partners (“Business Partners” or individually “Business Partner”) including but not limited to vendors/suppliers, distributors, dealers, joint-venture partners, agents, manufacturer’s representatives, intermediaries, consultants, contractors, subcontractors, licensees and other third parties engaged to provide goods or services to TTI Group that we engage, avoid participation in or consent to any practice that constitutes Modern Slavery. To achieve this, TTI Group, its employees, and Business Partners must follow the standards set by this Policy.

1.2 Objective(s)

The objectives of this Policy are as follows:

- Define the standards, expectations, and requirements that TTI Group employees and Business Partners must follow to prevent Modern Slavery in TTI Group’s business operations, whether overseen directly at TTI Group’s facilities or indirectly through the operations of Business Partners which TTI Group engages to support its business.
- Define how TTI Group will make efforts to avoid, detect and eradicate modern slavery from the Company’s or Business Partners’ operations.

This Policy will help TTI Group meet international legal obligations, commitments to its customers and best practices related to prevention of Modern Slavery, including, but not limited to:

- Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024) (<https://laws.justice.gc.ca/PDF/F-10.6.pdf>)
- EU Forced Labor Regulation (2024) (<https://data.consilium.europa.eu/doc/document/PE-67-2024-INIT/en/pdf>)
- EU Corporate Sustainability Due Diligence Directive (2024) (<https://eur-lex.europa.eu/eli/dir/2024/1760/oj>)
- The California Transparency in Supply Chains Act (http://www.leginfo.ca.gov/pub/09-10/bill/sen/sb_0651-0700/sb_657_bill_20100930_chaptered.pdf)
- United Kingdom Modern Slavery Act (2015) (<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>)
- United Nations Guiding Principles on Business and Human Trafficking (http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)
- Australian Federal Modern Slavery Act 2018 & New South Wales Modern Slavery Act 2018 (<https://www.legislation.gov.au/Details/C2018A00153>) and (<https://www.legislation.nsw.gov.au/#/view/act/2018/30>)

1.3 Scope

This Policy applies to:

- TTI Group and all TTI Group employees;
- TTI Group Business Partners.

2. Policy Requirements and Content.

2.1 Expectations

TTI Group will not tolerate the use of Modern Slavery by any employee or Business Partner in the operation or support of our business or the manufacture and distribution of our products. The following specific expectations apply to all TTI Group employees and Business Partners:

No TTI Group employees or Business Partner will:

- Participate, directly or indirectly, in any form of the trading or coerced transport of people for the purpose of exploitation
- Engage in or promote or assist in the sexual exploitation of others
- Use forced or involuntary labour in the performance of any work
- Retain an individual identity or immigration documents and deny access by that individual to these documents.

2.2 Requirements

2.2.1 Awareness and Certification

The Company's prohibition on Modern Slavery is defined in the TTI Code of Ethics and Business Conduct (<https://www.ttigroup.com/en/company/our-policies>), the TTI Business Partner Code of Conduct (<https://www.ttigroup.com/en/company/our-policies>) and this Policy. Every TTI Group employee and Business Partner is responsible for reading, understanding and certifying compliance with the aforementioned policies, as applicable. The certification process requires certification to the best of their knowledge that the materials they incorporate into TTI Group's products and the services they provide to TTI Group were generated in compliance with all applicable anti-slavery and anti-human trafficking laws.

2.2.2 Accountability and Management

TTI Group managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. TTI Group has established accountability standards and monitoring procedures to ensure that the requirements identified in this Policy are followed by TTI Group management, TTI Group employees, and TTI Group Business Partners.

2.2.3 Training

TTI Group provides key supply chain management personnel with training on Modern Slavery. TTI Group provides direct suppliers with a framework against which to assess their operational compliance with the anti-slavery and anti-trafficking requirements.

2.2.4 Verification, Audits and Investigations

As a manufacturing company, TTI Group appreciates the risks associated with and takes the following steps to verify, evaluate and address Modern Slavery, both in our employee-run and managed operations and in our supplier operations:

- Certification by employees to TTI Code of Ethics and Business Conduct (including prohibitions on Modern Slavery) and by suppliers to TTI Business Partner Code of Conduct, including request for information/changed circumstance disclosure
- Anti-Modern Slavery provisions included in supply agreements
- Modern Slavery Risk Assessment;
- Announced and/or unannounced site visits/audits/assessments for high risk operations/Suppliers – including by TTI Group's unrelated third-party auditors, attorneys and/or consultants;
- Required corrective action plan for non-conformities uncovered;

All TTI Group employees and Business Partners are required to fully and promptly cooperate with TTI Group's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents.

3. Violation Reporting.

Any TTI Group employee or Business Partner who has knowledge or information regarding any misconduct should report the information to the TTI Group Legal and Compliance Department. We operate under a NO RETALIATION policy. This means that you will not be retaliated against for making a communication to us. We will use our best efforts to protect your privacy and keep your communication confidential where allowed by law.

We have several ways for you to contact us, please refer to our Compliant Resolution Policy and Procedure.
<https://www.ttigroup.com/our-company/about-tti/our-policies/complaint-resolution-policy-and-procedure/>

4. Consequences of Non-Compliance.

- 4.1 Any TTI Group employee failure to cooperate with an audit or investigation related to this Policy, including, for example, hiding, deleting or destroying information or documentation, limiting investigator access to employees, or providing false information, may be grounds for disciplinary action, up to and including dismissal, subject to applicable law.
- 4.2 Any TTI Group employee failure to comply with this Policy qualifies as a breach of the employment agreement. TTI Group may take disciplinary action against the employee in question, up to and including dismissal.
- 4.3 Employees or Business Partners who fail to report actual or suspected violations of this Policy may be deemed in violation of this Policy as permitted by applicable law.
- 4.4 Compliance with this Policy is a mandatory condition of doing business with TTI Group. TTI Group will terminate its agreement with any business party engaged in Modern Slavery.
- 4.5 Violators may also be subject to separate civil and criminal penalties.

5. Red flags and indicators of Modern Slavery •

The following is a non-exhaustive list of potential red flags and indicators of Modern Slavery, designed to assist TTI Group employees when observing TTI Group or Business Partners operations:

Work and Living Conditions:

- Not free to leave or come and go as he/she wishes
- Is unpaid, paid very little, or paid only through tips
- Works excessively long and/or unusual hours
- Is not allowed breaks or suffer under unusual restrictions at work
- Owes a large debt and appears unable to pay it off
- Was recruited through false promises related to work
- High security measures are in place where none should be required (e.g., opaque or boarded up windows, bars on windows, barbed wire, etc.)
- Working hour data does not match worker accountings

Poor Health or Abnormal Worker Behaviour:

- Appear fearful, anxious, depressed, submissive, tense or paranoid
- Exhibits unusual behaviour if topic of law enforcement is raised
- Avoids eye contact, even when requested
- Lacks medical care and/or has been denied medical services by employer
- Appears malnourished or shows signs of exposure to harmful chemicals
- Shows signs of physical and/or sexual abuse, restraint, confinement, or torture
- No sense of time – cannot identify what day it is

Lack of Control:

- Has few or no personal possessions or all possessions appear to be in workplace
- Is not in control of his/her own money, no financial records, or bank account
- Is not in control of his/her own identification documents (ID or passport)
- Not permitted to speak for himself/herself (third party insists on being present to translate)
- Claims he/she is just visiting and cannot clarify residential address
- Lack of knowledge of where he/she is

