

1. Introduction

The purpose of the MiTek Mezzanine Systems Ltd (the Company) Modern Slavery and Human Trafficking Policy is to communicate to our employees, customers, suppliers, shareholders, and the communities we serve, our commitment to combatting modern slavery in the construction and structural steel components industry.

The Company is a provider of construction and structural steel components in the UK, European Union and United States of America and together with our global parent company, MiTek Inc. has a combined turnover more than £150 million.

The Company respects the United Nations Global Compact and adheres to the ten principles covering Human rights, Employment regulations and Anti-corruption. We work collaboratively with our Supply Chain and adhere to our core values.

We are dedicated to ensuring there is transparency in our business and in our approach to combatting modern slavery in all our operations. We expect the same high standards from all our subcontractors and suppliers.

Our policy draws upon our code of ethics and conduct, which underpins our strong values on corporate culture and guides our activities.

2. The Modern Slavery Act 2015

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales.

Section 54 of the UK's Modern Slavery Act 2015 is the transparency in supply chains provision. It requires commercial organisation's operating in the UK, with an annual turnover of £36 million or more, to prepare an annual statement on the steps the company has taken, if any, to ensure slavery and human trafficking is not happening in its own business and supply chains.

More than 45 million people are estimated to be entrapped in modern slavery across the world. They are deprived of their freedom for the personal or financial gain of their exploiter.

Slavery can take many forms the most common being domestic servitude, sex trafficking, forced labour, bonded labour, child labour and forced marriage.

We fully support the government's objective to eradicate modern slavery and human trafficking.

3. About the Policy

- This policy applies to all employees, subcontractors and suppliers. Compliance is mandatory.
- This policy does not form part of any employee's contract of employment. We may amend it at any time.
- You must ensure that you read, understand and comply with this policy. Prevention, detection and reporting of modern slavery is the responsibility of our employees, our subcontractors and our suppliers. You are required to avoid any activity which might suggest or lead to a breach of this policy.
- Breaches of policy by employees may result in disciplinary action and in the case of suppliers and subcontractors, may result in contract termination.
- If you suspect modern slavery is taking place, have any suspicions or are aware of any breaches to the policy please speak to a member of HR in confidence. Please also refer to MiTek's Whistleblowing directive or the company's procedure that is within the employee handbook.

4. Our commitment to the principles of the Modern Slavery Act 2015

This policy is governed by the board of directors with full support. Strong involvement and input are provided from procurement and HR. It is management's responsibility to communicate the expected standards to our employees and ensure that they conduct themselves in an appropriate

manner. Employees are invited to comment on this policy and suggest ways in which it might be improved.

As an equal-opportunities employer, MiTek Mezzanine Systems is committed to creating and ensuring a non-discriminatory and respectful working environment for its employees. The Company wants all its employees to feel confident that they can expose wrongdoing without risk to themselves.

MiTek Mezzanine Systems recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

We do not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

MiTek Mezzanine Systems maintains the following policies which are accessible to all employees:

- MiTek Code of Conduct
- MiTek Ethics Policy
- Whistleblowing Policy
- Bullying and Harassment Policy
- Diversity and Inclusion Policy
- Recruitment and Selection Policy

5. Communication and embedding the principles

MiTek Mezzanine Systems undertakes to ensure that its Modern Slavery and Human Trafficking Policy and those policies which derive from it are communicated effectively to directors, management, employees, subcontractors and suppliers via email, Inductions, noticeboards, employee handbook and toolbox talks. Guidance is also available from the CIPS website for procurement and the Supply Chain School.

The principles will continue to be embedded by the following activities:

- Provide awareness training to staff on the Modern Slavery Act 2015
- Ensure MiTek Mezzanine Systems procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Continue to embed a zero-tolerance policy towards modern slavery
- Ensure staff involved in the buying/procurement of goods, the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

6. Supply Chain

We are committed to working in partnership with our supply chain to tackle modern slavery and human trafficking, and to promoting Ethical and sustainable procurement throughout the company and the supply chain. We expect our supply chain to ensure the products they source comply with ethical standards and that they can offer full transparency.

High risk tier one suppliers will be highlighted from the heat mapping / risk analysis, a strategy will then be formalised as to how and when auditing and further checks are carried out on these supply chain members. We are also committed to producing a guidance booklet to help all stakeholders understand what is required of them and what help and support can be provided.

Date: November 2020