

Modern Slavery Policy

MiTek Inc. and its affiliates stand against slavery, servitude, or forced or compulsory labor and ask their business partners to do the same.

A. Risk Assessment

As part of its due diligence program:

1. The company will regularly review its practices and collaborate with external counsel in regard to human rights to remain updated on new trends, legislation and practices relevant to its operations. The company will then share this information with the rest of the organization through its policies and training. Lastly, the company will use this information to strengthen its due diligence program related to modern slavery.
2. The company will conduct a review of any suppliers that operate in countries with a higher risk of modern slavery, as published at <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> and <https://www.globallslaveryindex.org/resources/downloads/>, review the Modern Slavery Statements of suppliers, and understand the risks that they have identified.
3. The company will assess compliance at different stages of the procurement process through screenings of new suppliers. Additionally, the company will implement compliance clauses in its contracts, and conduct due diligence on high-risk suppliers.
4. The company will assess its effectiveness in managing modern slavery and human rights risks by tracking its actions and outcomes and consult with other entities or experts on modern slavery risks, how they are being managed and evaluate how well these efforts are working.

B. Company Practices and Structure

MiTek was founded in 1955. Today, MiTek is a diversified global supplier of integrated software, services, engineered products, and automated solutions to the building industry.

MiTek exists to transform the building industry with better building solutions while operating under its guiding principles of courage, innovation, stewardship, and unity.

Owned by Berkshire Hathaway since 2001, MiTek currently has close to 5,300 employees worldwide. The company operates in 18 countries, including the United States, Vietnam, Canada, the United Kingdom, Australia, South Africa, New Zealand, Philippines, Finland, Sweden, Czechia, France, Singapore, Germany, Poland, the Republic of Korea, Latvia, and the Russian Federation.

MiTek has appointed its General Counsel as its senior compliance officer. This officer will take appropriate steps to ensure not only MiTek's compliance with the modern slavery statement, but also that the company's values are adhered to by MiTek's suppliers, subcontractors, and other business partners on a global scale.

MiTek operates in Australia as MiTek Australia Ltd., a diversified global supplier of software, engineered products, services and automated manufacturing equipment for the residential construction industry and provider of estimating and takeoff software for building and construction, and estimating, drafting, and of structural design / computation services. MiTek Australia Ltd. is the parent company of Build Soft Pty Ltd. and Platinum Global Pty Ltd.

MiTek operates in the UK as MiTek Industries, Ltd., which specializes in the development of software solutions for structural timber engineering and the provision of steel connector products for its floor and roofing systems, and MiTek Mezzanine Systems, Ltd., which designs, manufactures and installs custom industrial mezzanine systems.

MiTek's structure in California includes the supply of software, engineered products, services and automated manufacturing equipment for the residential construction industry through MiTek Inc., and the provision of structural

framing systems and related services through Benson Industries, Inc., a manufacturer of curtain walls, and Sideplate Systems, Inc., which specializes in steel frame design and construction.

C. Supplier Audits and Certifications

MiTek will conduct vendor audits and site visits on an as-needed basis in higher risk countries, for vendors without anti-slavery measures in place, and otherwise when appropriate. Suppliers who do not comply with these audits or who fail an audit will be terminated.

MiTek expects its partners to adhere to modern slavery and human trafficking laws and strives to ensure that its partners comply with MiTek’s own principles.

MiTek will communicate its modern slavery and human trafficking policy to employees, customers, vendors and other third parties through its Code of Conduct, and this Modern Slavery Policy, each to be posted on its external websites.

On request, MiTek’s suppliers must certify their adherence to human trafficking and slavery laws in each of the relevant countries in which they operate. Suppliers must be able to provide details of the steps they have taken with their own businesses and supply chains to ensure they are free from slavery and human trafficking.

D. Internal Accountability

In order to maintain internal accountability standards regarding this policy, MiTek will conduct internal audits, review documents, and visit supplier manufacturing sites.

MiTek takes any breach of this Policy extremely seriously. Upon uncovering a breach of modern slavery and human trafficking laws, MiTek will take all necessary steps to address the violations and prevent their recurrence.

Employees are obligated to report any suspected violation of this Policy, and retaliation for reports made in good faith are strictly prohibited.

E. Training

Through annual policy review and trainings, MiTek will equip its employees with the skills and knowledge needed to identify, manage, and remedy any ethical dilemmas they encounter while conducting business.

MiTek will provide a copy of this policy to all employees, including strategic sourcing personnel and commodity managers, who will be responsible for vendor onboarding and receive detailed vendor onboarding processes. A copy of this policy will be posted on the MiTek external website.

This Policy has been approved by the Directors of MiTek Inc., the parent company of the organizations in Australia, the United Kingdom, and California, USA, described above.

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