
UK MODERN SLAVERY ACT STATEMENT 2021

Pyrotek Incorporated (“Pyrotek”) publishes this Modern Slavery Statement (“Statement”), pursuant to Section 54 of the Modern Slavery Act 2015 for the fiscal year ended 30 June 2021 (“FY21”). This Statement applies to Pyrotek and its wholly owned subsidiaries.

INTRODUCTION

Pyrotek is committed to good corporate citizenship and the highest ethical standards. To facilitate the fulfilment of these commitments, Pyrotek has established and maintains appropriate measures to safeguard against the occurrence of human rights abuses, modern slavery, and related human trafficking within its supply chain as well as within its own operations, as further detailed in this Statement.

BUSINESS AND ORGANIZATION

Pyrotek is a privately owned corporation headquartered in the United States. Pyrotek is recognized as a global engineering leader and innovator of performance improving technical solutions, integrated systems designs and consulting services for customers in the aluminum industry. Pyrotek sells its products and services globally, with operations on the ground in over 35 countries.

VALUES AND POLICIES

Pyrotek does not tolerate any form of modern slavery or human trafficking in any part of its business. Pyrotek is committed to tackling the risk of modern slavery from its supply chain and operations at a global scale. Pyrotek outlines this commitment and sets clear ethical standards for its employees, affiliated companies, and third-party suppliers through a policy framework.

Pyrotek’s Code of Business Ethics outlines how Pyrotek is committed to acting ethically in all aspects of its business and to maintaining the highest standards of honesty and integrity. All Pyrotek employees are required to uphold the Code of Business Ethics, which is available in multiple languages.

Pyrotek expects all organizations within its supply chain to adopt an equivalent approach in their operations. Pyrotek’s [Supplier Code of Conduct](#) sets out expectations of suppliers and applies to all of Pyrotek’s suppliers, vendors and subcontractors. The Supplier Code of Conduct includes requirements for fair labor practices, human rights (including prohibition on child, forced or bonded labor), and social impacts (such as anti-bribery and corruption) as well as other sustainability issues. Pyrotek reserves the right to evaluate compliance with the Supplier Code of Conduct through supplier surveys and review of relevant documents and policies.

Pyrotek’s Supplier Code of Conduct is set within a wider ethical framework, which includes Pyrotek’s [Human Rights Policy](#) and [Child and Forced Labor Policy](#). Pyrotek’s Human Rights and



Child Labor Policies reflect international standards and principles including the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

Pyrotek’s [Sustainability](#) and [Procurement](#) Policies further outline Pyrotek’s commitment to the highest ethical, environmental and quality standards in all procurement activities and require that suppliers and vendors uphold similar policies.

DUE DILIGENCE AND CONTRACTING

Pyrotek’s supplier relationships are governed by Pyrotek’s Supplier Code of Conduct which includes an absolute prohibition on forced or bonded labor. Pyrotek reserves the right to terminate its contracts with any supplier who is found to be in breach of Pyrotek’s Supplier Code of Conduct. Where appropriate, Pyrotek’s principal agreements further require Pyrotek’s business partners and suppliers to comply with all applicable laws that relate to their interactions with Pyrotek, including, but not limited to, modern slavery laws.

Pyrotek has further embedded checks for modern slavery in a due diligence process and has raised awareness of these issues with employees who manage the supplier vetting process. The due diligence process reflects the relative risk for potential suppliers and includes checks against global sanctions and enforcement databases (for example, OFAC and World Bank Debarment List) to identify risks including human rights abuses, human trafficking, and labor violations. Suppliers identified as medium or high risk are subject to further vetting and evaluation based on the specific supplier’s circumstances.

EFFECTIVENESS AND TRAINING

Pyrotek believes its efforts to date as outlined in this Statement have been appropriate in helping prevent modern slavery and human trafficking from entering its supply chains.

Pyrotek conducts periodic web-based trainings for employees to emphasize the importance of acting with integrity in line with Pyrotek’s Code of Business Ethics.

All Pyrotek employees are encouraged to raise concerns, including potential violations of company policies and applicable laws. Pyrotek does not tolerate any form of retaliation for raising concerns in good faith, asking questions, or participating in an investigation. Pyrotek’s Whistleblower Policy provides employees with various means by which they can raise concerns. This includes escalation to human resources, senior management, or confidential reporting to Pyrotek’s legal department.

APPROVAL

The Statement has been approved by Pyrotek’s President, Don Ting, on October 10, 2021.