

# Annual Statement Regarding Modern Slavery

Published December 11, 2024

Pyrotek Incorporated (“Pyrotek”) publishes this Annual Statement (“Statement”) in compliance with the requirements of the United Kingdom Modern Slavery Act 2015 (“UK MSA”), the Australia Modern Slavery Act 2018 (“Australia MSA”), Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (“Canadian Act”), and the California Transparency in Supply Chains Act 2010 for the fiscal year ended 30 June 2024. This is a joint Statement made on behalf of Pyrotek Incorporated as a reporting entity under the Australian, Canadian, UK and CA legislations cited above and Pyrotek’s wholly owned subsidiary, Pyrotek High-Temperature Industrial Products Inc., as a reporting entity under the Canadian Act. Unless expressly stated otherwise, references to ‘we,’ ‘us’ and ‘our’ refer to Pyrotek as a whole including its wholly owned subsidiaries. A table setting out how this Statement addresses the Australian, Canadian and UK legislation reporting criteria is in Appendix I.

## **1. Introduction**

Pyrotek is committed to good corporate citizenship and the highest ethical standards. We treat our own employees and people who are connected to our business with fundamental dignity and respect; and this includes a commitment to freely chosen employment. We comply with the letter and spirit of the applicable laws, regulations, and rules in jurisdictions where we operate and do not tolerate modern slavery in our organization or in those of our suppliers and subcontractors. For the purposes of this Statement, we use the term modern slavery to mean child labor, forced labor, and human trafficking in any form - including slave labor, prison labor, indentured servitude, or bonded labor.

To facilitate the fulfilment of these commitments, we have established and maintain appropriate measures to safeguard against the occurrence of human rights abuses and modern slavery within our supply chain as well as within our own operations, as further detailed in this Statement.

## **2. Structure, Activities, and Supply Chains**

Pyrotek is a privately owned corporation headquartered in the United States with global operations in more than 35 countries which includes subsidiaries or divisions in Canada, Australia, and the United Kingdom, among others. Our Canadian operations are in Quebec (Chicoutimi, Drummondville, and Sherbrooke) and British Columbia (Kitimat) operating under the name of Pyrotek High-Temperature Industrial Products Inc. Our Australian operations are in Sydney, Perth, Melbourne, and Brisbane operating under the name of Pyrotek Pty. Ltd. Our UK operations include TAB Refractory Construction and Maintenance Co. Limited (Warrington), EMP Technologies Limited (Burton-on-Trent) and Pyrotek Engineering Materials Limited (Milton Keynes).

Our company manufactures and supplies equipment to the aluminum industry. We also support our customers with technical services and maintenance agreements. Whilst our primary business is in the aluminum industry, we also have divisions that support glass production, acoustic and thermal solutions, and clean energy. We predominantly sell products that are designed and manufactured by our wholly owned subsidiaries.

Our supply chains are localized to support the respective customers and our internal manufacturing centers within specific regions. Our supply chains are predominately composed of companies in the industrial manufacturing, thermal insulation, and technical ceramics markets.

### **3. Policies and Due Diligence in Relation to Modern Slavery**

Pyrotek does not tolerate any form of modern slavery in any part of our business. We are committed to tackling the risk of modern slavery from our supply chain and operations at a global scale. We outline this commitment and set clear ethical standards for our employees, affiliated companies, and third-party suppliers through a policy framework.

Our efforts to assess and address risks of modern slavery across our business and supply chains are anchored in our policies. Our policies convey our values and expectations, setting a high bar for ourselves and our suppliers and making clear we do not tolerate modern slavery.

Pyrotek's Code of Business Conduct and Ethics and its associated policies, procedures, trainings, and communications highlight our support and respect for human rights and outline how Pyrotek is committed to acting ethically in all aspects of our business while maintaining the highest standards of honesty and integrity. Our approach is consistent throughout our operations globally. The Code of Business Conduct and Ethics applies to all Pyrotek entities and employees around the world and provides a framework within which we make responsible behavior a natural part of our operations.

In addition to our Code of Business Conduct and Ethics, we have specific policies addressing [Child and Forced Labor](#) and [Human Rights](#). These policies expressly prohibit engaging in or supporting human trafficking, forced labor and child labor in connection with Pyrotek's business activities and 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.

Our expectations for our suppliers are outlined in our [Supplier Code of Conduct](#) which references our Child Labor and Human Rights policies. We expect our suppliers and business parties to adopt and uphold policies and ethical business practices consistent with the principles and requirements described in the Supplier Code of Conduct.

The Supplier Code of Conduct reflects our core values, ethical principles, and our commitment to human rights. 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. The Supplier Code of Conduct is incorporated into our standard purchasing contract terms. We reserve the right to evaluate compliance with the Supplier Code of Conduct through supplier surveys and review of relevant documents and policies and further reserve the right to terminate our relationship with any supplier who fails to adhere to the expectations outlined in our Supplier Code of Conduct.

### **4. Risks of Modern Slavery in Our Operations and Supply Chains**

Based on our ongoing due diligence efforts, to date, we have not discovered any modern slavery in our operations or supply chains. We also believe that there is a low risk of modern slavery in our supply chains based on the industrial nature of our supply chain, sourcing from mostly developed countries and many

reputable suppliers with publicly stated positions regarding modern slavery and long-term relationships with our key suppliers. We empower local leadership at our divisional entities and subsidiaries with the authority to evaluate their local supply base and make sourcing decisions to best support their operations while upholding the principles set forth in Pyrotek's Supplier Code of Conduct. While we have confidence in our supply chain partners, we acknowledge the responsibility for due diligence and will continue to work with our supply chain partners concerning modern slavery for both awareness and compliance.

## **5. Addressing Modern Slavery Risks.**

The actions that we take to reduce the risk of modern slavery in our operations and supply chains are driven by our due diligence and monitoring strategy.

As mentioned, our supplier relationships are governed by Pyrotek's Supplier Code of Conduct which includes an absolute prohibition on modern slavery. The Supplier Code of Conduct is incorporated into our standard purchasing contract terms and we reserve the right to terminate contracts with any supplier who is found to be in breach of our Supplier Code of Conduct. Where appropriate, our principal agreements further require our 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.

Throughout the 2024 fiscal year, we have continued to monitor and safeguard against human rights abuses by undertaking an ongoing review of our internal policies, and providing training to employees on the updated policies. As part of this process, we have updated our Code of Business Conduct and Ethics to include more robust and specific requirements regarding human rights and environmental matters and have provided training to our workforce on the updated Code of Conduct.

Over the past year, we have also conducted an internal review of our largest raw material suppliers. The bulk of our spending on raw materials is done with a limited number of well established, large, reputable suppliers. This internal review has revealed that the majority of our large suppliers are similarly complying with reporting obligations under various applicable modern slavery legislations and are committed to ethical business practices as evidenced by their own internal policies regarding downstream suppliers. As part of this internal review, we have also consulted with primary purchasing departments of various Pyrotek entities and confirmed that policies regarding purchasing and supplier relationships are consistent throughout Pyrotek globally.

Led by Pyrotek's Global Sustainability Team, we have also committed to formalizing our approach to measuring environmental and social Key Performance Indicators in an effort to better understand the implications of our business activities, relationships, and operations. In doing so, we seek to further emphasize and incorporate environmental and social considerations in our decision making.

Over the past year, we have also undertaken significant internal mapping/surveying activities of our workforce for the purpose of verifying that no child or forced labor is present in our global workforce. We have collected data from a vast majority of our workforce with 100% of the respondents confirming that all employees throughout Pyrotek's global operations are of legal working age and all Pyrotek entities are complying with applicable local laws related to child and forced labor. We are committed to continuing and improving upon these internal mapping activities annually.

We recognize that modern slavery risks are more likely to exist where human rights principles are not respected. Therefore, we have begun the process of undertaking a comprehensive review of various child

and forced labor maps to identify which industries and localities carry the highest risk of child or forced labor. These activities are intended to identify and focus our efforts to the most relevant sectors of our operations and supply chains in order to prevent, mitigate and remedy actual or potential adverse human rights impacts.

As part of preparing this Statement, we have also engaged with the leadership of various Pyrotek entities to discuss the details of applicable modern slavery legislations, raise awareness, and understand their approach in mitigating modern slavery risks. These discussions have further confirmed that all Pyrotek entities are following the policies and procedures outlined above.

## **6. Training Provided to Employees Regarding Modern Slavery.**

We provide regular training to our employees throughout the globe regarding ethical business practices and the importance of acting with integrity in line with Pyrotek's Code of Business Conduct and Ethics. In addition, select segments of our executives and employees who oversee and manage our supply chain operations complete targeted training annually related to supply chain risks and review and acknowledge our Supplier Code of Conduct.

## **7. Measures Taken to Remediate Forced or Child Labor and the Loss of Income to the Most Vulnerable Families Resulting from Any Such Measures**

Pyrotek has not discovered any forced labor or child labor in our operations or our supply chains as of the publication of this Statement. Hence, no remediation measures have been taken.

## **8. Assessing Our Effectiveness and Additional Details.**

Within Pyrotek, all managers must annually acknowledge the Pyrotek Code of Business Conduct and Ethics. Our Code is clear on the requirement to comply with all applicable laws, rules, and regulations of the countries in which we operate and requires all employees to report actual or possible misconduct. Non-compliance with local laws governing modern slavery are grounds for disciplinary actions, up to and including the possibility of dismissal. As of the publication of this Statement we have not discovered any violations in our workforce concerning modern slavery.

In addition, Pyrotek has documented policies and procedures relating to grievances, disciplinary issues, and whistleblowing. These policies and procedures are a fundamental basis of our relationships with our employees. They both allow and encourage any employee with relevant information regarding violations of company policies or applicable laws to come forward without fear of retaliation so that we may promptly conduct an investigation and take all necessary corrective action. Furthermore, over the last year, we have implemented an anonymous reporting helpline for employees to raise concerns, including any concerns related to modern slavery or human rights abuses. The helpline is managed by an independent third-party company and provides a safe and secure 24-hour reporting line where employees can confidentiality and anonymously submit any ethical concerns including concerns related to modern slavery. This ethics helpline is in addition to various other established methods and policies designed to allow Pyrotek employees to speak up and share any concerns.

While at present we do not have a formal process to assess effectiveness; to date, we have not received any complaints from employees, or third parties related to concerns about modern slavery. We recognize that our review and assessment of our actions to identify and address modern slavery risks in our

operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we regularly review our strategies and supporting policies to identify opportunities for improvement, assess the effectiveness of our approach and inform our path forward. We are committed to identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance improvements. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

This Statement has been reviewed and approved by Pyrotek's board of directors on December 11, 2024

Signed:



Don Ting  
President and COO

Date: 12-11-24

**Attestation pursuant to the Canadian Act**

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Respectfully,



Don Ting,  
President and COO

*I have the authority to bind Pyrotek*

Date 11-12-24

## Appendix I – How our Statement Addresses the Australian, Canadian and UK Legislations’ Reporting Criteria

Australian MSA mandatory reporting criteria	Canadian Act mandatory reporting criteria	UK MSA recommended reporting criteria	Reference in this Statement
Identify the reporting entity.			Opening paragraph
Reporting entity’s structure, operations, and supply chains.	The organization’s structures, activities, and supply chains.	Organization’s structure, its business, and its supply chains.	Section 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Describe the parts of the organization’s business and supply chains where there may be a risk of forced or child labour being used, and the steps taken to assess and manage that risk.	Parts of the organization’s business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Sections 4 and 5
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Describe the organization’s policies and due diligence processes in relation to forced labour and child labour, measures taken to remediate any forced labour and child labour; training provided to employees on forced labour and child labour.	Organization’s policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff	Sections 3, 5, and 6
Describe how the reporting entity assesses the effectiveness of such actions.	Describe how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	Organization’s effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Section 8
N/A	Describe any measures taken to remediate the	N/A	Section 7

	loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains		
Describe the process of consultation with entities the reporting entity owns or controls	N/A	N/A	Section 5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A	N/A	Section 8