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# Slavery & Trafficking Compliance Policy Statement

At CTM Magnetics, we are committed to upholding the highest ethical standards and ensuring compliance with all applicable laws and regulations, including those related to Slavery & Trafficking. We recognize the importance of promoting responsible business practices, protecting human rights, and preventing any form of modern slavery within our operations and supply chain.

## **Legal Compliance:**

- **a.** We acknowledge the existence of various national and international laws and regulations related to Slavery & Trafficking compliance. These include but are not limited to the federal Modern Slavery Act 2015, the U.S. Federal Acquisition Regulation's anti-human trafficking Rule, and US Department of Labor's Bureau of International Labor Affairs.
- **b.** We are committed to ensuring compliance with these laws and will continuously monitor and adapt our policies and practices to meet the evolving regulatory landscape.

## **Supply Chain Management:**

- **a.** We recognize that our supply chain plays a crucial role in our commitment to Slavery & Trafficking compliance. We will implement and maintain robust systems and processes to evaluate and manage risks within our supply chain.
- **b.** Our vendor selection process will include due diligence measures to assess the ethical standards and compliance practices of our suppliers.
- **c.** We will strive to work with suppliers who share our commitment to human rights and responsible business practices.

# **Reporting & Disclosures:**

- **a.** We will establish clear channels for reporting any concerns or suspicions related to Slavery & Trafficking within our organization. Whistleblower protection mechanisms will be implemented to ensure the confidentiality and protection of those who come forward.
- **b.** We will comply with any applicable reporting or disclosure requirements related to Slavery & Trafficking compliance, as mandated by local laws and regulations.

### **Training & Awareness:**

- **a.** We will provide training and educational resources to our employees and relevant stakeholders to raise awareness about the risks associated with Slavery & Trafficking and to ensure their understanding of our policies and procedures.
- **b.** Regular updates and communications will be conducted to keep our employees informed about our commitment to Slavery & Trafficking compliance and any changes to relevant laws or regulations.

## **Responsibility & Accountability:**

- **a.** The responsibility for overseeing and implementing this policy lies with the Internal Quality Control department and 3rd party auditors.
- **b.** Our commitment to Slavery & Trafficking compliance is aligned with our core values, and all employees are expected to adhere to this policy and report any non-compliance.

### **Continuous Improvement:**

**a.** We are committed to continuously reviewing and improving our policies and practices related to Slavery & Trafficking compliance. We will monitor industry best practices, legal developments, and stakeholder feedback to ensure the effectiveness and relevance of our approach.

This Slavery & Trafficking Compliance Policy Statement represents CTM Magnetics' commitment to preventing modern slavery and human trafficking and ensuring responsible business practices. It will be made available to all employees, suppliers, and stakeholders through our internal and external communication channels.

Steve Foley | CTM Magnetics QA Manager