



MODERN DAY SLAVERY POLICY

Introductions

At Universal Fabrications, we are committed to upholding human rights and ethical business practices throughout our operations and supply chains. As part of this commitment, we acknowledge the existence of modern day slavery, human trafficking, forced labour and other forms of exploitation, and we are dedicated to never utilize these practices in our business and in the businesses of our suppliers.

Policy Statement

- 1. Zero Tolerance:** Universal Fabrications has a zero tolerance policy towards modern day slavery, human trafficking, forced labour, and any other form of exploitation within our operations and supply chains. We will not tolerate any involvement in such practices, whether directly or indirectly, by any of our employees, contractor, suppliers, or business partners.
- 2. Compliance with Laws and Regulations:** We will comply with all relevant laws and regulations concerning slavery and human trafficking in all jurisdictions in which we operate.
- 3. Due Diligence:** We will conduct thorough due diligence assessments to identify and mitigate risks of modern day slavery and human trafficking within our operations and supply chains. This includes assessing the risk profile of our suppliers, monitoring their compliance with our standards, and taking appropriate action if any risks are identified.
- 4. Supplier Engagement:** We will engage with our suppliers to promote awareness of modern day slavery and human trafficking risks and to encourage them to uphold ethical labour practices. We will collaboratively work with suppliers to implement corrective action where necessary and to support continuous improvement in labour standards.
- 5. Employee Training and Awareness:** We will provide training and awareness for all employees to ensure they understand the risks of modern day slavery and human trafficking and their role in preventing it.
- 6. Reporting and Whistleblowing:** We will establish clear channels for reporting concerns or suspicious modern day slavery or human trafficking, including a confidential whistleblowing mechanism. Employees, suppliers, and other stakeholders will be encouraged to report any instances of potential exploitation, and we will investigate and address reported concerns promptly and impartially.
- 7. Remediation and Accountability:** If instances of modern day slavery or human trafficking are identified within our operations or supply chains, we will take immediate action to remedy

the situation, including terminating relationships with any suppliers found to be involved. We will also hold individuals and entities accountable for their actions.

- 8. Transparency and Communication:** We will communicate openly and transparently about our efforts to combat modern day slavery and human trafficking, both internally and externally.

Conclusion

With the support of the HR department Universal Fabrications is responsible for overseeing the implementation of this policy and ensuring that all employees and relevant stakeholders are aware of their responsibilities under it. The HR department will regularly review and update the policy if necessary, to reflect changes in legislation and best practices.

At Universal Fabrications, we recognize our responsibility to respect and uphold the dignity and rights of all individuals. By adhering to this policy and working collaboratively with our stakeholders, we will strive to create a world in which exploitation and injustice have no place.

This policy is subject to periodic review and updates as necessary. Employees are encouraged to refer to the most recent version of this policy posted on the online HR portal for any changes.