



S-5![®]

The Right Way

MODERN SLAVERY STATEMENT



OUR MISSION IS ... TO CREATE INNOVATIVE SOLUTIONS TO ATTACH VIRTUALLY ANYTHING TO A METAL ROOF — ***THE RIGHT WAY™***

It is not just a slogan—it is our credo and rule of conduct. Having served the industry from the beginning as the original inventor of an all-new and distinctive product category, we have the knowledge, research, engineering, testing, production capability, ingenuity and overall expertise to develop and stand behind our products like no other in this marketplace.

What makes us the leader in our product category, standing above the rest, is a culture and

ethos within our leadership to strive for perfection. From business ethics and customer service to the quality of the products, this drive for perfection leads to excellence in every aspect of our business.

Operating in 35 countries across the world, people are at the heart of S-5! and the reason why we exist. Across our entire value chain – customers, suppliers, team and communities – people are vital to bringing our brand to life.



CORPORATE STRUCTURE AND OPERATIONS

Metal Roof Innovations, Ltd., the “reporting entity” as defined in the Act, is widely recognised under our trademarked brand, “S-5!” For simplicity and consistency, this document will primarily refer to the company as S-5! throughout this statement. The terms ‘Group’, ‘we’, ‘us’ and ‘our’ will refer collectively to the entire organisation, unless the context specifies otherwise.

Metal Roof Innovations is registered as a Type “C” Corporation in the United States and is branded and does business as S-5! Our corporate headquarters is located at 12730 Black Forest Rd., Colorado Springs, CO 80908, USA, with additional sales and services satellite locations globally. Our Australian branch office, which operates under ABM#80 286 023 793 (effective December 1st, 2020) – is located at 4/36 King William St. Broadmeadows, VIC 3047. The Group is entirely (100%) owned by Rob Haddock,

who serves as founder and CEO. Joel Mandel acts as CFO/COO, and together they lead and manage the company’s daily operations across all regions.

S-5! also benefits from the guidance of an Advisory Board comprising seven experienced members, each with expertise spanning construction, metal roofing and business operations. The Board is dedicated to driving continuous improvement, ensuring fiscal responsibility and fostering the S-5! culture at every level of the organisation.

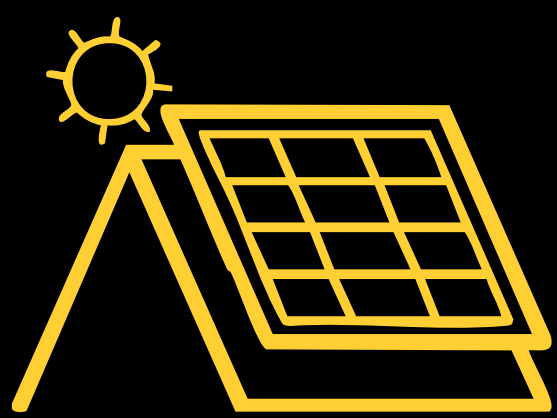
While the majority of our ~155 employees are based at our two main U.S. locations– Colorado Springs, Colorado and Iowa Park, Texas–our team also includes regionally positioned sales and field engineering staff, who provide critical support to our global stakeholders. This includes key sales and field support staff at our office in Broadmeadows-Victoria, Australia.

S-5! SOLUTIONS, SERVICE AND ENGINEERING

S-5! specialises in attachment solutions for metal roofs across diverse applications including solar arrays, snow retention, fall protection and wind performance systems, satellite dishes, signs and banners, light fixtures, stack/flue

bracing, service walkways, HVAC systems, lightning protection, equipment screens, conduit, condensate lines and more. Our clamps and brackets are designed to preserve roof integrity while providing secure, long-lasting attachment.

1



SOLAR MOUNTING SOLUTIONS

Our premier solar mounting solution is the PVKIT®, Direct-Attach™ system—the world's first and most renowned rail-less system for mounting solar modules on metal roofs.

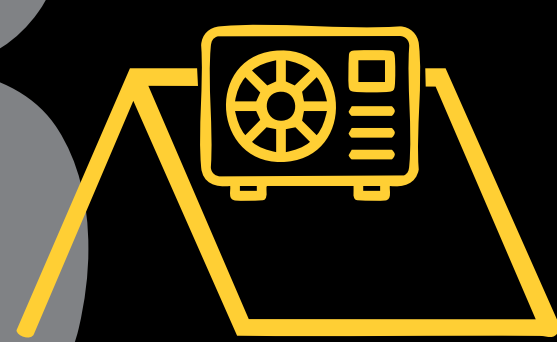
2



SNOW RETENTION SYSTEMS

ColorGard® is our flagship snow retention system designed to prevent rooftop avalanches. It is engineered on a site-specific basis and provides perfect color- and finish-matching. We also offer alternative snow guard solutions.

3



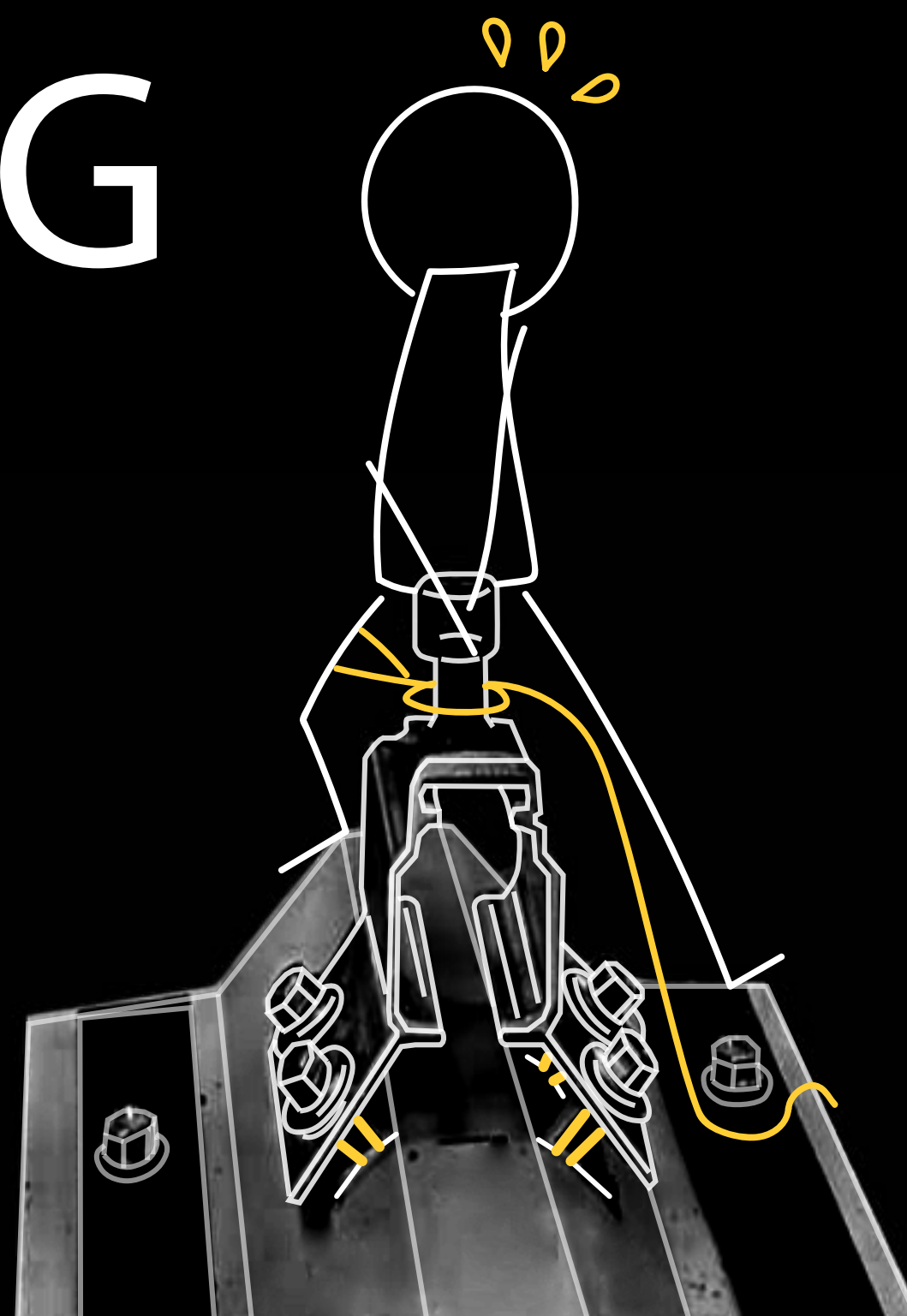
UTILITY MOUNTING SYSTEM

Our primary utility attachment solution, the GripperFix® utility mounting system, is ideal for mounting HVAC, satellite dishes and other rooftop equipment..

ENGINEERING & TESTING

S-5! provides extensive engineering support, testing and certifications to ensure code compliance and structural integrity. Our capabilities include:

- Load testing & wind uplift analysis to validate attachment strength.
- Structural engineering support to assist with project-specific requirements.
- PE stamped reports for code compliance and permitting.
- Compatibility assessments for different metal roof types.



S-5!'s clamps and brackets undergo rigorous testing by an independent third-party accredited lab for durability and are designed to maintain roof warranties. S-5! solutions are trusted on metal rooftops in 86 countries, including Australia.

COMMITMENT IN AUSTRALIA

In Australia, S-5! supports the transition to renewable energy by providing solar mounting solutions for both residential and commercial metal roof projects. We collaborate with solar installers, metal roofing manufacturers and engineering firms to ensure code compliance, structural integrity, and ease of installation. Our dedicated Australian team provides sales

and engineering support to clients throughout the APAC region, reinforcing our widespread adoption in Australia's solar industry, where metal roofs are common.

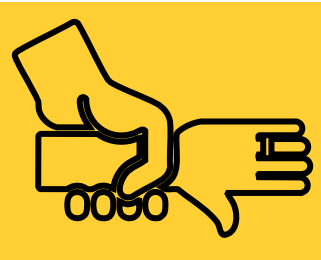
UNDERSTANDING MODERN SLAVERY

Anti-slavery policies are vital for fostering moral, legal and societal alignment on a global scale. According to the Australian government’s Modern Slavery Register, an estimated 27.6 million people are subjected to forced labour, while approximately 14.9 million women and girls are living in forced marriages worldwide. These figures highlight the scale and severity of modern slavery.



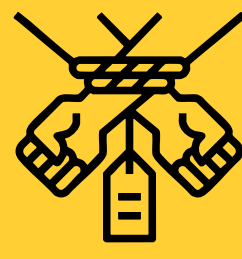
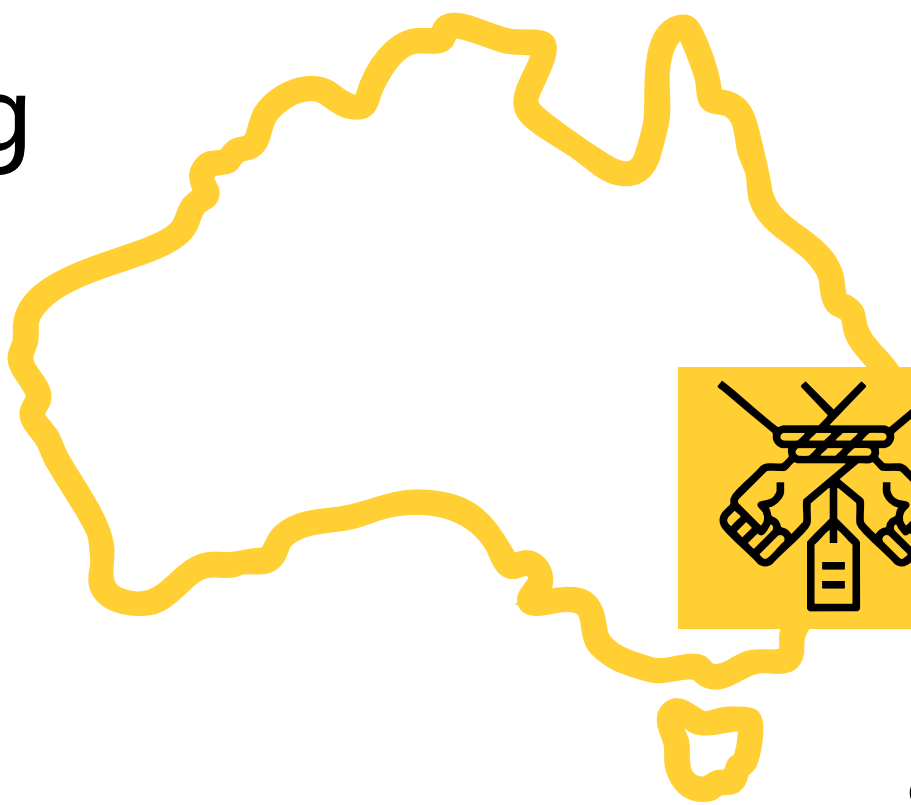
26.7 MILLION

PEOPLE SUBJECTED TO FORCED LABOUR



14.9 MILLION

WOMEN AND GIRLS LIVING IN
FORCED MARRIAGES



1,300 - 1,900

HUMAN TRAFFICKING AND
SLAVERY VICTIMS IN AUSTRALIA

Research by the Australian Institute of Criminology estimates that between 2015/16 and 2016/17, the number of human trafficking and slavery victims in Australia ranged from 1,300 to 1,900.

Alarmingly, this data suggests that only one in five victims is ever identified, underscoring the hidden nature of this crime. Exploitation takes many forms, from forced labour and human trafficking to various acts of physical violence and psychological coercion. Factors such as economic hardship, social insecurity and the desire for a better life often trap individuals in these dire circumstances.

The construction industry, in particular, faces heightened risks of exploitation as the rising demand for cheap labour creates fertile ground for abuse. By implementing robust anti-slavery measures and raising public awareness, we can better protect vulnerable individuals and work towards a society where everyone can live free from exploitation, violence and fear.

This commitment aligns with S-5!’s core values, reinforcing our dedication to upholding human rights and ensuring dignity for all people.

OBJECTIVES OF ANTI-SLAVERY POLICIES

1



PROTECT BASIC HUMAN RIGHTS

Ensure individuals are treated with dignity and not as property or forced into labour against their will.

2



PROVIDE ECONOMIC EQUITY

Create a more level playing field in the workforce.

3



PREVENT SOCIAL UNREST

Mitigate the risks of instability and violence within communities.



An AI generated world map with highlighted regions where modern slavery still exists

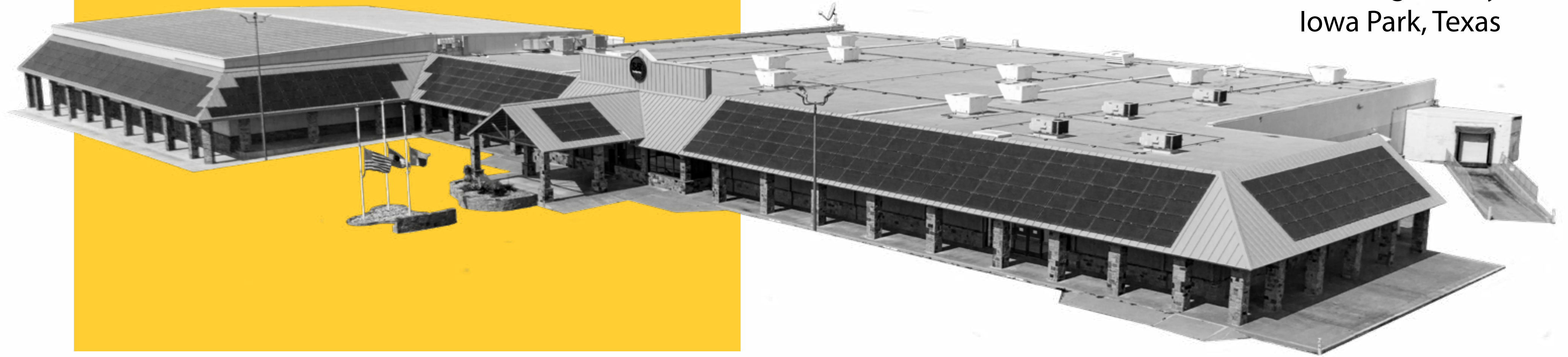
An increasing number of nations are adopting anti-slavery policies to tackle this global crisis. Australia’s Modern Slavery Act 2018 serves as a key model for S-5!’s own policies across our global operations.

By aligning with this legislation, we ensure our practices meet international standards and demonstrate our unwavering commitment to combating modern slavery in all markets where we operate.

S-5!'S ANTI-SLAVERY POLICY INITIATIVE

For decades, S-5! has been at the forefront in driving robust building codes and standards with organisations and permitting jurisdictions. Our commitment to excellence in quality and safety has also driven us to adopt Environmental, Social and Governance (ESG) policies, solidifying our leadership in the industry.

In collaboration with our Australian clients, S-5! has partnered with Bureau Veritas Australia Pty Ltd (Bureau Veritas), a global leader in building trust in business-to-business relationships, to establish an anti-slavery policy. With more than 190 years of experience and a presence in 1,600+ plus offices globally, Bureau Veritas is uniquely positioned to support S-5!’s mission.



COMPANY OVERVIEW

Established in 1992 by renowned industry expert, CEO and Founder Rob Haddock, S-5! is the world's leading authority on metal roof attachment solutions. Based just outside of Colorado Springs, Colorado, the company's continued success resulted in the establishment of a dedicated manufacturing facility in Iowa Park, Texas.

Made in the USA, S-5!'s zero-penetration clamps and lifetime brackets are engineered for a variety of roof-mounted applications and are now installed on more than 2.5 million metal roofs worldwide.

The S-5! manufacturing plant represents state-of-the-art equipment and automation, certified to ISO 9001:15 quality assurance standards. The company uses only certified raw material and is regularly audited by UL, FM, ICC, TÜV, SAI Global and Intertek. S-5! is proud to work predominantly with U.S.-based vendors, allowing the company to tightly control its quality input and supply chain reliability.

S-5! has been an innovative

leader since its inception, founded on principles of listening, understanding, collaborative troubleshooting, robust engineering and certified testing. As a global leader, S-5! also recognises the need to be responsive in the areas of ESG.

In September 2024, Bureau Veritas was voluntarily engaged by S-5! to undertake an assurance audit of our operations and confirmed that our practises align with the S-5! ESG Policy statement (www.s-5.com), including our commitment to anti-slavery, making us the first company in our category of products to meet these strict criteria, both in Australia and worldwide.

We take immense pride in delivering only the highest quality products—Tested, Trusted and Engineered. Our products are manufactured in our own facilities, which adhere to the strictest global standards for working conditions and safety. Our commitment extends beyond quality; we strive to promote a just society for all, ensuring that our practises reflect our values and contribute positively to the communities we serve.



THE S-5! SUPPLY CHAIN

Our Commitments – This anti-slavery policy applies to all employees, contractors and suppliers of S-5! *dba* Metal Roof Innovations, Ltd. Management is responsible for ensuring compliance with this policy and promoting a culture of transparency, integrity and respect

for human rights throughout the organisation.

To maintain its effectiveness and relevance, this policy will be reviewed periodically. Updates will be made as necessary to reflect changes in laws, regulations and best practises in combating modern slavery and human trafficking.

SUPPLY CHAIN OVERVIEW

S-5! is a design/engineering and manufacturing company specialising in the production of metal roof attachments. Our products are the result of highly advanced engineering, as demonstrated by 200+ issued patents we've earned over the years. We manufacture a range of products that allow contractors to safely attach solar panels, fall protection, MEPs, snow guards and other rooftop accessories with our brackets and clamps. Our manufacturing operations are based in Iowa Park, Texas (USA), and our products are shipped globally to distributors of construction materials. Our primary vendor partners providing key materials, such as aluminum extrusions and rubber sealants, are predominantly based and operated in the U.S.

SUPPLY CHAIN



RISK MANAGEMENT

Our ESG Team has conducted a comprehensive risk assessment, gathering insights from multiple sources to categorise potential risks based on both internal and external factors. Upon reviewing our internal policies and our labour practises, we are highly confident in our commitment to employee satisfaction and maintaining a strong work-life balance. In fact, S-5! was recently recognised as a best workplace (medium-sized company) in Colorado Springs as determined by an employee survey. (<https://gazette.com/best-workplaces/#>)

Externally, we closely examined our supply chain practises, specifically the products and materials we use—aluminum extrusions, screws & hardware, and sheet metal. A thorough assessment identified several areas of focus, which are detailed in Attachment C "Initial Risk Assessment – Targets & Focus (July - September 2024)." We found that many potential risks were mitigated due to our supply chain being predominantly U.S.-based. Over 95% of our product line is sourced from U.S. suppliers, and their tier-two supply chains are also U.S.-based. Once these areas were fully reviewed, we engaged independent auditor, Bureau Veritas, to ensure an objective evaluation and minimise any internal bias in our assessments.



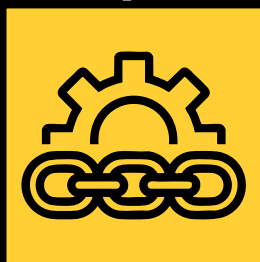
COMPLIANCE

We will comply with or exceed all applicable laws and regulations relating to modern slavery and human trafficking in all the jurisdictions in which we operate. With our physical operations primarily based in the U.S., and regional support offices in Australia and Spain, we are strategically positioned to effectively uphold and promote our corporate values across the regions where we operate.



ZERO TOLERANCE

S-5! maintains a zero-tolerance policy towards modern slavery and human trafficking. We do not engage in or tolerate any form of forced labour, child labour or human trafficking within our operations or supply chain. If we identify a concern or violation, a supplier is given 30 days to provide corrective action, but all business is terminated until such proof of compliance is provided.



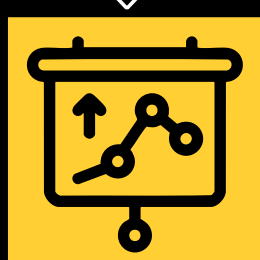
SUPPLY CHAIN DUE DILIGENCE

We are committed to ensuring that our supply chain is free from modern slavery and human trafficking. We have documented “Letters of Compliance” with all our vendors, and to date, 95% of our raw materials are based within the U.S. We conduct due diligence on our suppliers to assess and mitigate risks of modern slavery and human trafficking. This includes evaluating supplier practises, policies and adherence to ethical standards. Additionally, S-5! is deeply engaged within the “Renewable Energy Sector” bringing a heightened attention to not only sourcing policies but also considerations related to greenhouse gas emissions or carbon footprints. Currently, approximately 85% of our materials contain recycled content, and we are on track to achieve carbon neutrality by 2027.



SUPPLIER ENGAGEMENT

We will work closely with our suppliers to raise awareness of modern slavery and human trafficking issues and to promote ethical practises within our supply chain. We will encourage suppliers to implement robust policies and procedures to prevent and address modern slavery and human trafficking. Attachment B provides a sample engagement letter with our suppliers and the strict nature of the demands to remain part of the S-5! supply chain. We have a limited number (~ seven) core vendors, and the average tenure of those partnerships is now 19 years. All suppliers are currently located in the U.S.



EMPLOYEE AWARENESS AND TRAINING

S-5! provides comprehensive training and awareness programmes to educate its employees about the risks of modern slavery and human trafficking, empowering them to identify and report any concerns. All managers receive quarterly in-person updates on emerging trends, new legislation and opportunities to make a positive impact on society.



REPORTING & ACCOUNTABILITY

We encourage all employees, suppliers and stakeholders to report any suspected cases of modern slavery or human trafficking immediately. Reports will be investigated thoroughly, and appropriate action will be taken in accordance with our policies and procedures.

SUPPLY CHAIN MODERN SLAVERY RISK ASSESSMENT

The Bureau Veritas assurance audit ensures that our systems are compliant with Australia’s Modern Slavery Act 2018 (also France, UK, California), which we believe currently represents the most robust criteria of any governmental authority. The audit covered seven core principles and required demonstrated examples to support more than 250 audit questions encompassing: Operations; Social;

Labour; Health; Safety; Procurement; and Business Ethics. The audit covered the complete operations in Iowa Park, Texas and Colorado Springs, Colorado, which include all of our sourcing functions globally.

The post-audit statement included in our documentation process pertains specifically to the information within the defined scope of assurance outlined below

SCOPE OF AUDIT & ASSURANCE

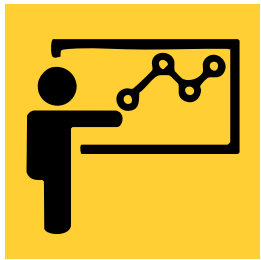
S-5! prepared and formalised its ESG policy in 2024, which includes the S-5! Anti-Slavery Policy statement that serves as a foundational commitment to leadership in social responsibility and stakeholder engagement.

To ensure a thorough and sustainable approach, we engaged an external expert to evaluate and test our systems. This independent audit was successfully completed in October 2024. The audit conclusion, provided by Bureau Veritas is included as Attachment A.



BUREAU
VERITAS





TRAINING

In 2024, the S-5! company policy was communicated to its employees at its annual code of conduct training. This annual training included a course dedicated to anti-human trafficking. Salaried employees in high-risk roles, such as the Legal, Human Resources and Supply Chain functions, are assigned courses based on function and associated risks.

S-5!'s leadership principle—***The Right Way***— sets the highest standards of behaviour and treatment of stakeholders.

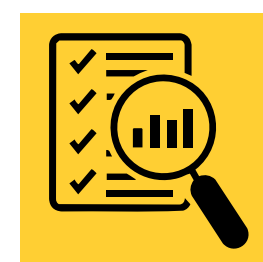


REPORTING MECHANISMS & SUPPLIER AGREEMENTS

S-5! maintains relationships with suppliers through contracts grounded in legal and ethical standards. These contracts incorporate standard agreements mandating supplier adherence to S-5!'s Code of Conduct and ESG Policy, which include our position on anti-slavery. This code underscores the commitment to uphold fundamental human rights, expressly prohibiting child labour, slavery, prisoner labour, and any other forms of forced or involuntary labour.

The Business Partner Code clearly sets forth S-5!'s expectations for ethical operations by suppliers. It requires suppliers to ensure respect for basic human rights and strictly forbids forced

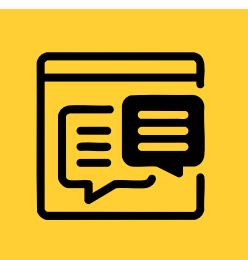
and child labour. S-5! reserves the right to cease procuring goods or services from any supplier found to be involved in modern slavery or human trafficking.



ASSESSING THE EFFECTIVENESS OF EFFORTS TO COMBAT MODERN SLAVERY

S-5! evaluates the effectiveness of its actions to combat modern slavery through a combination of employee awareness metrics, including training performance, bi-annual 360 employee surveys and ongoing education on modern slavery issues. Additionally, we require vendors to contractually agree with our entire ESG policy, which incorporates our anti-slavery policy. S-5! will regularly assess supplier compliance with those guidelines. Furthermore, we took the proactive step of engaging a third-party auditor, Bureau Veritas, to assess our operations in alignment with this Policy and ensure compliance with best practises for combating Modern Slavery.

During the audit, three non-critical areas were identified for enhancement to help us achieve best-in-class standards. The audit also highlighted that our supply chain, primarily composed of U.S.-based vendors, plays a significant role in mitigating the risks of Modern Slavery, enabling us to uphold our core standards and effectively manage these risks.



CONSULTATION PROCESS

S-5!'s global compliance programme addressing modern slavery and anti-human trafficking is overseen by a cross-functional Environmental, Social & Governance (ESG) Committee. This committee is comprised of members from five key corporate functional areas (HR, Sales, Engineering, Manufacturing, Procurement). To ensure alignment with our core values, the programme is also reviewed by Rob Haddock and Joel Mandel. During this reporting period, the committee conducted a comprehensive review of all company assets and stakeholders – including employees, vendors, clients and authorities Having Jurisdiction (AHJs) – to ensure the application of best practises.

Further, we engaged an independent global auditing firm to validate the strength and effectiveness of the programme. Key updates are communicated to the core management team, each quarter, during all-managers' meetings, ensuring consistent alignment

and accountability across the company.

We believe that our collaborative approach to this consultation process meets and exceeds the requirements set forth by governing bodies in Australia, the UK, California and other regions. This approach also benefits S-5!, by way of example, raising industrywide standards and fostering positive change. As part of our commitment, we actively include modern slavery challenges in our advocacy efforts, engaging employees, clients, vendors, the press, architects and designers, ensuring the intent of the Australian 2018 Modern Slavery is professionally communicated to all stakeholders.

In compliance with the consultation process requirements under the Australian Modern Slavery Act 2018, Bureau Veritas, acting as an external auditor, assessed current risk and compliance levels. They also assisted in establishing key performance indicators (KPIs) to monitor and evaluate the effectiveness of ongoing oversight processes.



LOCATIONS COVERED

S-5! corporate office is located at:
12730 Black Forest Rd.,
Colorado Springs, CO, 80908 USA

S-5! manufacturing facility is located at:
500 W. Hwy St.,
Iowa Park, TX, 76367 USA

Australia sales and service location is at:
4/36 King William St.
Broadmeadows, VIC 3047

This statement, as well as the commitments contained herein, was reviewed and approved by the executive leadership in their capacity as the principal governing authorities of "S-5!," a Metal Roof Innovations brand on March 31, 2025.

Rob Haddock, CEO & Founder, S-5!

Joel Mandel, COO, S-5!



NOTES

Additional supporting documents can be found on our website at www.s-5.com under our Sustainability section.

This statement is intended to support our commitment to meeting the guidelines laid out in the following jurisdictions:

- Australian federal Modern Slavery Act
- The California Transparency in Supply Chains Act
- Modern Slavery Act 2015 (UK)
- ILO Conventions: The International Labour Organisation has conventions against forced labour, such as Convention No. 29 (Forced Labour Convention) and No. 105 (Abolition of Forced Labour Convention)
- EU Directive 2011/36/EU: Addresses the prevention of human trafficking and protection of victims within the European Union

Entities & Organisations S-5! researches and leverages to stay informed about trends:

- Anti-Slavery International: The world's oldest international human rights organisation, working to end modern slavery globally
- International Labour Organisation (ILO): A United Nations agency that sets labour standards and promotes decent work conditions, with specific programmes focused on combatting forced labour
- Walk Free Foundation: Known for its Global Slavery Index, which provides data and raises awareness about modern slavery worldwide
- United Nations Office on Drugs and Crime (UNODC)

Source: <https://modernslaveryregister.gov.au/resources/>

ATTACHMENTS

- **Attachment A:** Bureau Veritas Letter
- **Attachment B:** Consent Letter
- **Attachment C:** Risk Assessment
- **Attachment D:** International Government Best Practises

Attachment A: Bureau Veritas Letter



Environmental, Social Governance Assessment Metal Roof Innovations dba S-5! 500 W Hwy St, Iowa Park, TX 76367

Conducted by Dane Kennedy
September 24-25, 2024

Executive Summary

A scoping and planning session was conducted with representatives of Metal Roof Innovations dba S-5!" to conduct an assessment against customized Environment, Social and Governance (ESG) criteria. The assessment was conducted remotely on September 24-25, 2024.

The assessment was conducted on the Iowa Park Manufacturing center located at 500 W Hwy St, Iowa Park, TX 76367.

The organization provides products, attachment methods for rooftop accessories such as Snow Retention, Solar Panels, Fall Safety, Catwalk and HVAC units.

The facility operates utilizing two (2) buildings. The primary building is the manufacturing center. The building is 74,000 sq ft with 63,000 of that being manufacturing and the remainder being offices and support areas such as a lunch/break room, and bathrooms. The other building is a recently renovated 2,400 sq. ft building used as a fulfillment/small parts shipping area and offices.

The location employed 74 male and 31 females at the time of the assessment. The youngest individual employed was 20 yrs old.

The Management and Supervisory roles were comprised of 8 males and 7 females.

The employees are trained in role specific areas of need.

The location does not provide housing accommodation for employees. The employees are properly compensated for the work performed and are provided with safe working conditions.

All suppliers are contractually provided with the expectations of the organizations well defined ESG and related State and Federal regulatory requirements. The vendors are subjected to compliance/conformance -based assessments.

The majority of the raw material vendors are based in the United States. Adequate traceability measures appear to be in place.

Method of Assessment

The assessment checklist provided was formed to ascertain ESG compliance and performance of selected key stakeholders against the organizations requirements, regulatory requirements and other relevant criteria.

The audit checklist was segregated into 4 categories:

Social & Labor, Business Ethics, Health & Safety and Responsible Procurement



ESG Assessment – Metal Roof Innovations dba S-5!

Attachment A: Bureau Veritas Letter, continued

Interviews were conducted with representatives of specific departments of the organization.
A shared file system was provided for a review of objective evidence documents and records at a greater level of detail as needed.

The table below reflects the assessment findings and compliance results:

Criteria	Number of noncompliances	Number of applicable checkpoints	Compliance %
Social & Labor	0	98	100%
Business Ethics	0	18	100%
Health & Safety	0	69	100%
Responsible Procurement	0	47	100%
Total	0	232	100%

A technical review of the assessment checklist was conducted by Bureau Veritas and a copy was provided to the organization.

Conclusion

Metal Roof Innovations dba S-5! has developed a comprehensive Environmental and Social Governance (ESG) platform. The organizations ESG is reviewed, audited and updated as needed in all affected areas of the operations for applying continuous improvement measures.
The ESG serves as a key contractual mandate for the organizations operational stakeholders.
The organizations ESG performance is shared in other documentation such as Corporate and Social Responsibility reports.

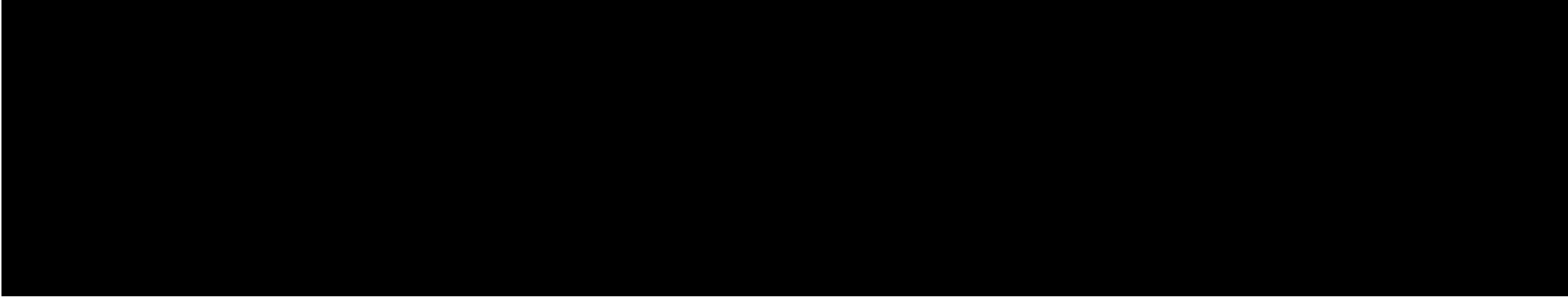
Assessor: *David P. Kelly*
Date: 10/14/24

Note:
The information contained in this report is based on information provided during the audit process.
Bureau Veritas Certification does not guarantee compliance with all statutes or relevant recognized standards nor does Bureau Veritas Certification guarantee that all risks and hazards have been identified within the areas and sites during the audit process.

This report is confidential, and distribution is limited to the authorized parties



ESG Assessment – Metal Roof Innovations dba S-5!



Attachment B: Consent Letter



[Vendor's Name]
[Vendor's Address]
[City, State, ZIP Code]

[Date]

Subject: Agreement to Comply with S-5! ESG and Anti-Slavery Policies

We are writing to confirm our mutual commitment to upholding the highest standards of ethical conduct and sustainability in our business practices. As part of our ongoing efforts to ensure responsible and ethical operations, S-5! has established robust Environmental, Social, and Governance (ESG) policies, alongside strict anti-slavery and human trafficking statements.

We request your formal agreement to comply with these policies, detailed as follows:

Environmental, Social, and Governance (ESG) Policy

- 1. **Environmental Stewardship:** Commitment to sustainable practices, including waste reduction, energy efficiency, and minimizing carbon footprint.
- 2. **Social Responsibility:** Ensuring fair labor practices, promoting diversity and inclusion, and contributing positively to the communities in which you operate.
- 3. **Governance:** Adherence to ethical business practices, transparency, and accountability in all operations.

Anti-Slavery Policy

- 1. **Prohibition of Forced Labor:** Ensuring that all work is voluntary, and employees have the freedom to leave employment at any time.
- 2. **Fair Compensation:** Providing fair wages and benefits that comply with local laws and regulations.
- 3. **Safe Working Conditions:** Maintaining a safe and healthy work environment for all employees.
- 4. **No Child Labor:** Ensuring that no child labor is used in any part of your operations or supply chain.
- 5. **Regular Audits and corrective actions:** Agreeing to regular audits and assessments to ensure compliance with these policies and remediation should issues arise.

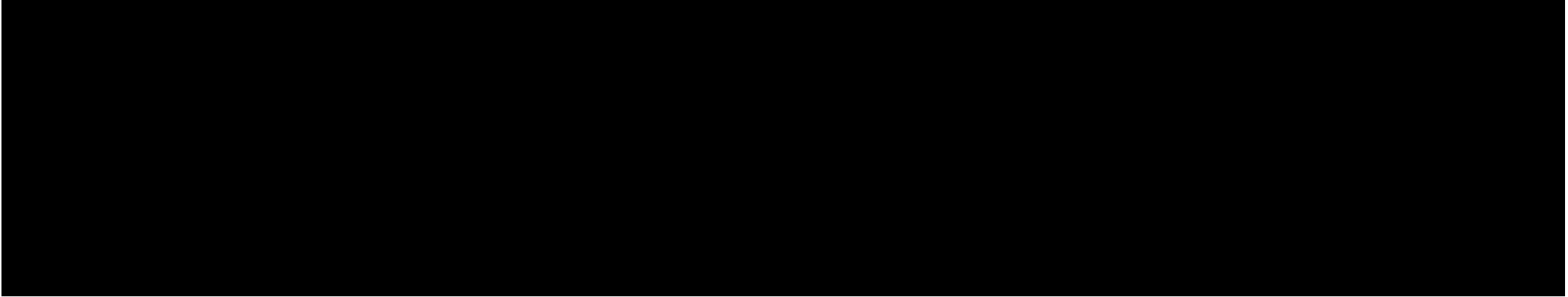
By signing this agreement, you affirm your commitment to align with [Your Company Name]'s ESG and anti-slavery policies. We believe that these principles are essential not only for ethical and sustainable business operations but also for the long-term success of our partnership.

Please review the attached detailed policy documents and sign below to confirm your agreement.

We appreciate your cooperation and look forward to continuing our successful collaboration under these shared values.

Sincerely,

Joel Mandel,
COO/CFO
S-5!
12730 Black Forest Rd.
Colorado Springs, CO 80908



Attachment B: Consent Letter, continued

Acknowledgment and Agreement

I, [Vendor's Name], on behalf of [Vendor's Company], hereby acknowledge and agree to comply with [Your Company Name]'s ESG and Anti-Slavery policies as outlined above.

Signature: _____

Name: _____ Title: _____

Date: _____

Attachment C: Risk Assessment



S-5! Initial Risk Assessment – Targets & Focus

When sourcing materials, such as aluminum extrusions, screws, hardware and sheet metal, modern slavery risks primarily arise in the upstream supply chain, particularly in raw material extraction, processing and manufacturing. Below is an analysis and breakdown of the key risks associated with these materials:

1. Aluminum Extrusions

High-Risk Regions: China, India, Brazil, Guinea, Malaysia

Key Risks:

- Bauxite Mining Exploitation:
 - Guinea (West Africa): Major supplier of bauxite (aluminum ore), where forced labor and child labor have been reported.
 - Brazil & India: Allegations of land grabbing and forced evictions of Indigenous communities by mining companies.
- Processing in China & Forced Labor:
 - Xinjiang, China: The region, which produces a significant portion of the world's aluminum, has been linked to forced labor of Uyghur workers in state-sponsored programs.

High Energy Use & Environmental Exploitation: Aluminum smelting requires immense energy, and some operations exploit workers in unregulated regions.

Potential Mitigation Strategies:

- Source low-carbon aluminum from certified suppliers (e.g., ASI – Aluminum Stewardship Initiative).
- Avoid suppliers linked to Xinjiang forced labor programs.
- Ensure traceability of aluminum back to the mine and refinery.

2. Screws, Bolts & Other Hardware (Fasteners)

High-Risk Regions: China, India, Vietnam, Thailand

Key Risks:

- Low-Wage Factory Work & Forced Overtime:
 - Many fasteners are manufactured in China, Vietnam and India, where factories may enforce excessive overtime and poor conditions.
- Steel & Zinc Sourcing Risks:
 - Many screws are coated with zinc, which is mined in China, Peru, and India—countries with child labor and wage exploitation issues.
 - Steel screws and bolts rely on iron ore, often mined in Brazil, India and China, where reports of forced labor exist.

Potential Mitigation Strategies:

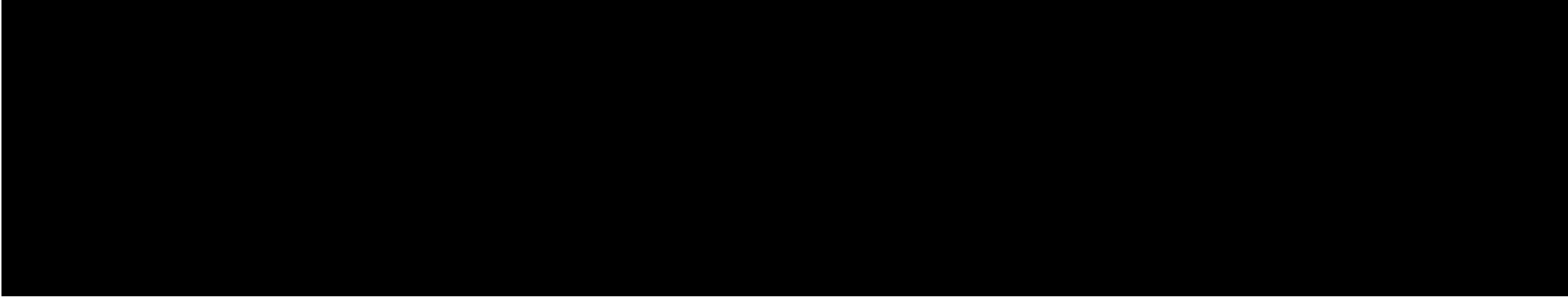
- Look for suppliers certified under SA8000 (Social Accountability Standard) or ISO 45001 (worker safety).
- Choose fastener manufacturers in regions with stronger labor laws (e.g., US, EU, Japan).
- Audit suppliers for labor conditions and ethical sourcing of raw materials.

3. Sheet Metal (Steel & Aluminum-Based)

High-Risk Regions: China, India, Russia, Indonesia

Key Risks:

- Steel & Aluminum Extraction:
 - Steel production relies on iron ore mining, often linked to forced labor in Brazil, India and China.



Attachment C: Risk Assessment, continued

- In Russia and China, there are concerns about migrant worker exploitation in metal processing plants.
- Smelting & Refining Issues:
 - High risk of forced labor in Xinjiang, China, where aluminum and steel are produced under exploitative conditions.
 - Nickel mining for stainless steel (Indonesia & Philippines): Reports of worker abuse, debt bondage, and toxic exposure.
- Harsh Working Conditions in Sheet Metal Factories:
 - Many factories enforce long shifts in unsafe environments, especially in unregulated industrial zones.

Potential Mitigation Strategies:

- Buy from smelters with labor and environmental certifications (e.g., Responsible Steel, ASI).
- Avoid Chinese suppliers linked to forced labor, especially in Xinjiang.
- Use recycled metals where possible, reducing reliance on high-risk raw material sources.

Final Analysis & Core Risks Identified

1. Raw Material Mining: Bauxite, iron ore, zinc, nickel extraction pose significant modern slavery risks.
2. High-Risk Manufacturing: Regions include China, India, Brazil and Russia.
3. Factory Exploitation: Unethical factory labor including forced excessive overtime and unsafe working conditions.

The S-5! Commitment:

S-5! exclusively partners with thoroughly vetted U.S.-based suppliers with whom we have established longstanding relationships. This deliberate strategy effectively eliminates the modern slavery risks identified in the upstream supply chain outlined in this assessment, ensuring ethical sourcing and production practices throughout our operations.

Attachment D: International Government Best Practises



International Government Best Practices

1. United States (California)

- The **California Transparency in Supply Chains Act 2010** requires businesses with annual worldwide gross receipts exceeding \$100 million and operating in California to disclose their efforts to eradicate slavery and human trafficking from their supply chains.

2. United Kingdom

- The **Modern Slavery Act 2015** mandates that businesses with an annual turnover of £36 million or more to publish an annual slavery and human trafficking statement. This statement must outline the steps (if any) the company has taken to ensure that slavery and human trafficking are not taking place within its operations or supply chains.

3. France

- The **Duty of Vigilance Law 2017** requires large French companies (with more than 5,000 employees in France or 10,000 employees worldwide) to create a vigilance plan. This plan should identify and prevent human rights abuses, including modern slavery, across their own operations and supply chains.

4. Australia

- The **Modern Slavery Act 2018** applies to businesses with a consolidated revenue of AUD 100 million or more. These businesses are required to report annually on the risks of modern slavery in their operations and supply chains and describe actions they are taking to address those risks.

5. Netherlands

- The **Child Labor Due Diligence Law 2019** requires businesses to assess whether child labor exists in their supply chains and develop plans to prevent it. Although focused on child labor specifically, this ties into broader efforts to combat forced labor and slavery.

6. Germany

- The **Supply Chain Due Diligence Act 2021**, effective in 2023, requires large companies (with over 3,000 employees) to ensure human rights due diligence, including the prevention of modern slavery, throughout their supply chains. The law also imposes fines for non-compliance.

7. Norway

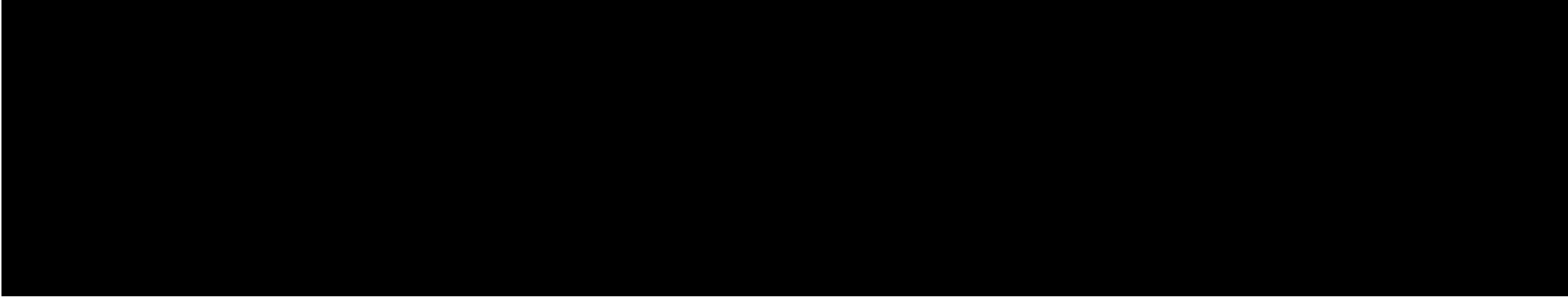
- The **Transparency Act 2021** mandates that companies publicly disclose how they work to prevent human rights violations, including modern slavery, within their supply chains.

8. Switzerland

- Under Swiss corporate responsibility law, which came into effect in 2022, companies are required to conduct due diligence on human rights and environmental risks, which includes addressing risks of forced labor and modern slavery.

9. Canada

- Canada passed its **Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023)**, also known as **Bill S-211**. The law requires large companies and government institutions to report annually on efforts to prevent forced and child labor within their operations and supply chains.



Attachment D: International Government Best Practises, continued

10. New Zealand

- New Zealand has introduced the **Modern Slavery and Worker Exploitation Bill**, which will require large businesses to assess and address the risk of modern slavery and worker exploitation in their supply chains. This bill is under development but reflects growing international trends.

11. European Union

- The **EU Directive on Corporate Sustainability Due Diligence** (under consideration) will, when implemented, require companies operating within the EU to identify, prevent and mitigate adverse human rights impacts, including modern slavery, in their supply chains.

12. Belgium

- In 2023, Belgium passed a law that requires companies to conduct human rights due diligence to ensure that forced labor and human trafficking are not present in their supply chains.

International Standards and Guidelines

Beyond national laws, global frameworks, like the **UN Guiding Principles on Business and Human Rights** and the **OECD Guidelines for Multinational Enterprises** also encourage businesses globally to prevent human rights violations, including modern slavery, throughout their operations and supply chains.

Summary

This list highlights the key countries and international organizations whose regulations we monitor to ensure adherence to best practices in combating modern slavery. The compilation is based on multiple reference sources (cited earlier in the Notes section of the document) to guarantee that our practices are in line with the most rigorous global standards for transparency and accountability in supply chain management.