

Shurtape Technologies, LLC Consolidated Statement for California Transparency in Supply Chain Act of 2010, UK Modern Slavery Act 2015, and the Australia Modern Slavery Act 2018

In accordance with the California Transparency in Supply Chains Act of 2010 (SB 657), UK Modern Slavery Act (2015), and the Australia Modern Slavery Act (2018), Shurtape Technologies, LLC (“Shurtape”) and its subsidiaries¹ (together, the “Company”) are providing this statement to inform of the processes and practices implemented during the fiscal year ending December 31, 2020, to address the risks of Modern Slavery in their manufacturing facilities, distribution centers, sales locations, and global supply chain. Modern Slavery includes all forms of forced, coerced, or enslaved labor as well as child labor and human trafficking.

Our Business, Operations and Supply Chain

Shurtape continuously strives to be regarded as an industry-leading manufacturer and marketer of adhesive tapes and consumer home and office products. Shurtape employs over 1,400 people globally with operations in the United States, United Kingdom, Germany, Mexico, Peru, United Arab Emirates and China. Shurtape is a limited liability company headquartered in the United States with subsidiaries operating worldwide. Finished products are manufactured both in Shurtape-owned facilities in the US and China as well as by external suppliers.

Our Governance and Policies

Three of Shurtape’s core values, *Believing in People*, *Fostering Stewardship*, and *Communicating Openly and Honestly* exemplify the principles behind our actions and programs implemented to address Modern Slavery throughout the Company and our supply chain.

Shurtape’s Modern Slavery (Social Compliance) program and policies are of the utmost importance to the Shurtape Executive Leadership Team, who reviews and approves the policies and their implementation. Shurtape and its subsidiaries have zero tolerance for Modern Slavery.

Consistent with our core values, Shurtape’s Board of Directors and the Executive Leadership Team are committed to establishing an ethical culture which continuously fosters an atmosphere of integrity and equitable treatment of all employees. These core values are reflected in our [Code of Business Conduct and Ethics](#) (the “Code”). The Code summarizes basic guiding principles and standards of conduct to guide all employees, officers and directors of the Company in meeting our goal of achieving the highest business and personal ethical standards as well as compliance with all laws and regulations applicable to our business. Shurtape expects its business partners including, but not limited to, agents, consultants, contractors, suppliers, and representatives, to also adhere to high business and personal ethical standards.

The Code covers a wide range of business practices and procedures, but it cannot address every applicable law or respond to every ethical question or concern that could potentially arise. All Shurtape employees, officers and directors must conduct themselves in accordance with our ethical and

¹ Currently this includes Shurtape Australasia Pty Ltd (ABN: 55 622 039 070), pursuant to the Australia Modern Slavery Act. Shurtape Technologies, LLC and its subsidiaries share the same operations and supply chain and the same modern slavery policies and practices.



compliance standards in every aspect of our business and seek to avoid even the appearance of wrongdoing or improper behavior.

In 2020, Shurtape drafted and approved policies and procedures to standardize how the Company addresses Modern Slavery in our facilities and throughout our supply chain.

In 2020, Shurtape developed training on the Code and the risks of Modern Slavery in our Company and supply chain that all Shurtape employees will receive. The Modern Slavery training encompasses the meaning and signs of Modern Slavery, information on why and how to report suspected Modern Slavery or grievances through our grievance mechanism, and provides employees with information on how and who to report to, including in-person via the chain of command, electronically, or via phone. Contact numbers for global reporting agencies are provided. Reporting can be done anonymously if desired.

Risks of Modern Slavery and Our Actions to Assess and Address Those Risks

Shurtape has identified risks of Modern Slavery in our supply chain related to our sourcing of raw materials (rubber) and manufacturing. These risks include human trafficking, forced or compulsory labor, child labor, and working conditions (wages, penalties and working hours).

Shurtape continues to monitor our operations and our direct, tier one suppliers for indicators of Modern Slavery. In 2020, Shurtape expanded our program for risk-based assessment of our operations and supply chain with the development of standards and methods for assessing the risk of supplier ethical programs. Shurtape uses *The Slavery & Trafficking Risk Template (STRT)* questionnaire along with the SEDEX platform for this purpose. Additionally, data gathered from the aforementioned methodologies is used to map Shurtape's supply chain.

Using the risk assessment results, Shurtape conducts announced and unannounced third-party audits of a subset of identified higher-risk suppliers. Our expectation is that any critical vulnerabilities or failures identified by our audits will be promptly and certifiably addressed by our suppliers. Failure to do so will result in escalation of the issue, which may include termination of the commercial relationship and notification of the appropriate legal authorities.

Shurtape also informs new suppliers of Shurtape's commitment to addressing risks of Modern Slavery in our supply chain. Shurtape's zero-tolerance of Modern Slavery is communicated through the onboarding process and via Shurtape's Supplier Human Trafficking Self-Certification. The Self-Certification captures the supplier's commitment to ensure indicators of Modern Slavery do not exist in their operations or supply chain. Shurtape requires all new and existing suppliers to certify that they have completed the following:

- Assessment of their supply chains for risks pertaining to Modern Slavery in the country or countries in which they conduct business.
- Agreement to permit Shurtape to initiate third-party evaluation of operations for indicators of Modern Slavery.
- Certification that they have trained their management and workforce on Modern Slavery provisions.

Failure by a supplier to address indicators of Modern Slavery shall result in actions taken by Shurtape, which may include termination of the commercial relationship and notification of the appropriate legal authorities. In the event an incidence of Modern Slavery is identified in Shurtape operations, Shurtape will collaborate with local organizations who assist Modern Slavery victims, and local authorities, as appropriate, on remediation. In the event an incidence of Modern Slavery is identified in the Company's supply chain, Shurtape will encourage its supplier to immediately implement appropriate remediation

measures and will cooperate with the supplier's efforts in that regard. To date, Shurtape is not aware of any identified incidences of Modern Slavery in a Shurtape manufacturing factory, distribution center, sales locations, or supply chain.

Shurtape assesses the effectiveness of its actions to address the risks of modern slavery through a quarterly and annual evaluation of internal metrics and key performance indicators such as internal and third-party audits of the supply chain, year-over-year improvement in the STRT, results of the self-certification, and supplier participation in SEDEX. High-priority findings are elevated to the Executive Leadership Team.

COVID-19

As a result of the COVID-19 pandemic, Shurtape has implemented the use of 3rd party virtual audits instead of onsite, in-person full and follow-up audits. In addition, 3rd party desktop reviews are utilized to address applicable non-compliances resulting from a full or follow-up audit.

Shurtape will continue to set internal goals and expand our efforts to raise awareness of Modern Slavery to ensure that we live up to our zero-tolerance commitment.

Approved on 29 June 2021 by the Board of Directors of Shurtape Technologies, LLC, and signed by:

Original signed by Stephen P. Shuford on 29 June 2021.

Stephen P. Shuford
Vice Chairman, Shurtape Technologies, LLC

