

Panduit Corp.

2025 Modern Slavery Joint Statement

Purpose

This statement is intended to meet Panduit Corp.'s reporting obligations under the U.K. Modern Slavery Act (2015), Australian Modern Slavery Act 2018 and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211) collectively referred to as ("Acts"). This statement describes our efforts to address modern slavery and child labor, and covers Panduit's business, including all wholly owned and controlled subsidiaries and our supply chain.

Reporting entity

Panduit Corp. ("Panduit") as a U.S. based privately held company headquartered in Tinley Park IL, USA, is providing a joint statement regarding modern slavery forced labor and child labor. We are a highly centralized company and have an interconnected supply chain, using many of the same suppliers and shipping between related entities. Our entities around the world use similar if not the same policies and processes and operate in the same industry sector (telecommunications network infrastructure).

This report will provide the requested information under the Acts on the procedures and policies Panduit takes to remediate and reduce the risk of forced or child labor in its supply chain.

Reporting Entity's Structure, Operations/Activities and Supply Chain Structure

Panduit is a leader in infrastructure products and services for data networks and electrical power applications. It provides products that are essential to data centers and office facilities to plant floors and processing lines. We design, build, install, and service innovative solutions. Panduit has a global presence with over 5,000 employees worldwide. In the reporting countries of Australia, Canada, and UK, each has less than 60 employees.

Panduit's global reach is achieved through regional sales offices, warehousing locations, and distribution partners. Panduit has manufacturing locations in China, Singapore (2023), Malaysia (2024), Mexico, Costa Rica, Romania, and the U.S. The central warehouse is in Dekalb, Illinois and it is the primary supplier to Panduit warehouses and manufacturing in Australia (warehouse) Mexico, Malaysia, China,

Japan, and Netherlands (warehouse). It also supplies into Canada to a third-party managed warehouse or drop shipments to Panduit customers. Costa Rica is the largest manufacturing location that supplies the U.S., Netherlands, Australia, Canada, Malaysia, China, Japan, and Mexico directly.

Most of Panduit's international shipments are between related companies and manufacturing locations. However, this may include products and services from third parties, where the product or service stays local or moves across borders.

In 2024, Panduit had approximately 4,830 direct and indirect suppliers and a spend of \$723,316 million.

Suppliers by geographic region

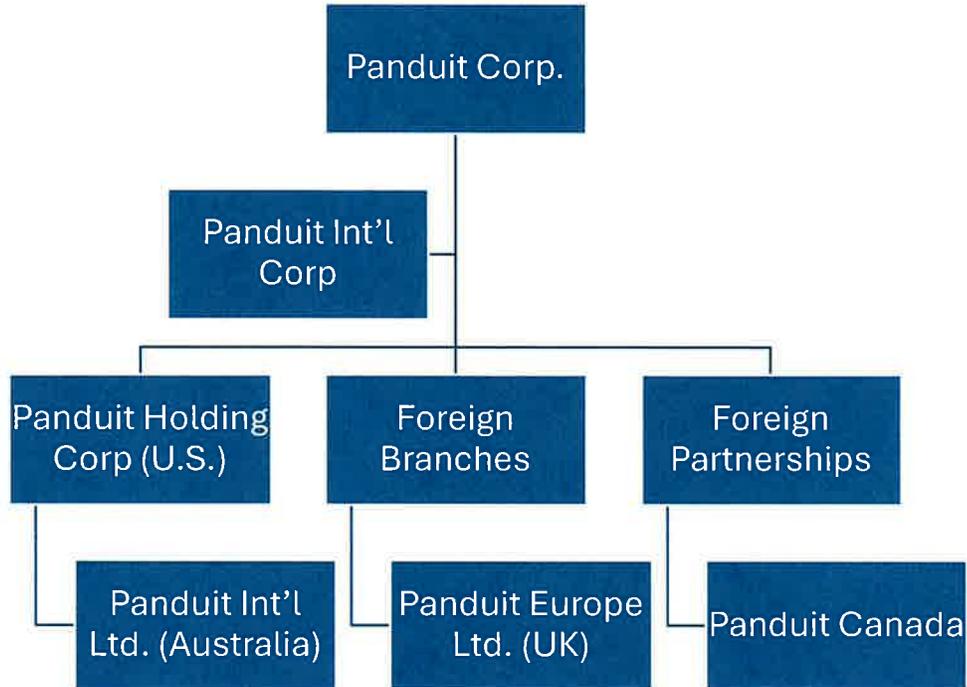
Asia-Pacific (APAC)	27%
EMEA	18%
LATAM	21%
North America	34%

Suppliers by monetary spend

Asia-Pacific (APAC)	25%
EMEA	9%
LATAM	9%
North America	57%

I. Structure, activities and supply chains of each country or region subject to the Acts

Simplified Structure of Panduit reporting entities covered by this statement



Details of reporting countries:

Panduit Corp. (“Panduit”) has a business presence in Canada through its subsidiary Panduit Canada Corporation (“Panduit Canada”) (BN 865704829) and has a registered mailing address at 1741 Lower Water Street, PO Box 997, Halifax NS B3J 2X2. Panduit Canada does not hold inventory but acts as an importer into Canada. Local warehousing of imported products is managed by a third-party logistics company. All sales made by Panduit Canada to Canadian customers are fulfilled from either the third-party logistics provider location or drop shipped to the customer from Panduit U.S., DeKalb, Illinois warehouse.

Panduit has a business presence in the United Kingdom through its Panduit Europe Ltd. VAT:GB867289956 with a corporate office at 184 Shepherds Bush Rd. London. This entity employs EMEA support staff such as finance and human resources. Panduit’s German entity, Panduit GmbH sells products to customers located in the

UK and product is shipped from the Panduit Netherlands warehouse, which acts as the importer when required.

Panduit Holding Corp. has a business presence in Australia that manages a warehouse operation at 21 Endeavour Court, Dandenong South, Victoria 3175, Australia. It employs several employees, including sales. Panduit Australia imports product from other Panduit warehouse and manufacturing locations.

Panduit meets the thresholds outlined in each of the respective Modern Slavery Acts reporting based on its global presence and other financial requirements established by each Act.

II. Policy and Due Diligence, Risk Management

We are working towards ensuring all internal policies meet standards established by international organizations, to identify and prevent modern slavery in our supply chain. We have a long-standing commitment to ethical behavior which includes labor standards and fair employment practices. You will find these stated in our:

Company Policies

- Supplier Code of Conduct (the "[Supplier Code of Code](#)") outlines clear expectations of our supply chain partners and invites them to participate in our commitment to work responsibly. Our suppliers are expected to comply fully with all international laws and regulations around the world, which include labor standards.
 - Panduit's Code of Ethics and Business Conduct (the "[Code of Conduct](#)") contains reporting mechanisms available to internal and external parties to identify any unethical behavior on the part of Panduit or our business partners, including our supply chain partners. The Code of Conduct sets forth the ethical standards and expectations for all Panduit employees and all third parties doing work for us around the world. The Code of Conduct is available in various languages on the company's website.
 - [Conflict Minerals Policy](#)
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III. Risk Assessment

Preliminary Risk Assessment specific to forced labor was performed by internal compliance teams and general sustainability risk determined through Ecovadis rating process (Achieved Bronze rating).

The Panduit Ethics and Compliance team being a central function to the reporting entities performed a risk assessment based on the “Better Trade Tool” developed by the US Department of Labor’s Bureau of International Labor Affairs, which identifies higher risk profile products imported by Harmonized Tariff Schedule code and country of origin. Our initial assessment of our first-tier supply risk has been identified through this process. The results showed a small percentage of the supply chain (<2%) may be at risk of having forced/child labor. We will continue to monitor changes in the global supply chain and seek how best to obtain information to assess additional tiers of the supply chain (suppliers, global sourcing of raw materials) that may have an impact on our forced/child labor risk.

Communication of Risk

The results of Ecovadis risk assessments are highlighted in the [Panduit 2023-2024 Sustainability Report](#). Finally, a quarterly executive review with Panduit Risk and Compliance Teams is conducted to assign resources or take action to address company risks.

IV. Remediation of loss of income

Panduit has not taken any direct measures to remediate the loss of income resulting from measures taken to eliminate the use of forced/child labor in 2023 since forced labor risk was not identified as significantly impacting our supply chain.

V. Direct Remediation and Actions

Measures taken to remediate forced/child labor in the supply chain are under review. We are establishing our program to identify risks and monitor high-risk products and raw material vendors. Given we have not identified specific issues or significant risks, Panduit has not taken any direct measures to remediate any

forced/child labor in 2024. As we build out our program, we will consider how to directly remediate forced labor concerns in the supply chain.

If a product in our supply chain is alleged to benefit from forced or child labor, our Global Trade Compliance Team, Sourcing Department and Legal Department would investigate the matter and, if substantiated, take appropriate action involving the relevant supplier, which may include preventative measures, working with supplier to remedy the issues, or termination of the supplier and notifying relevant legal authorities in the appropriate jurisdiction.

VI. Training and Assessed Effectiveness

We have bi-annual training on our Code of Conduct and are revising this training for effectiveness. Our Code of Conduct expresses our commitment to a responsible supply chain. Panduit employees are trained annually through our on-line learning center on a variety of topics that bring awareness to labor concerns. Training specific to forced and child labor was offered by the company as standalone training, to our global Sourcing team members. We are considering expanding who in our organization would benefit from receiving this type of training and the right level of training to provide to a broader audience. As this training is implemented by the Ethics and Compliance department, we will measure and track the success of our efforts to prevent and reduce the risks of forced labour.

VII. Assessment of Program Effectiveness

Panduit has focused its efforts on making enhancements to our vendor due diligence program, and we expect that refining our protocols will be an ongoing process. We expect to develop meaningful metrics to assess the effectiveness of our program in preventing and/or reducing forced/child labor as our program matures.

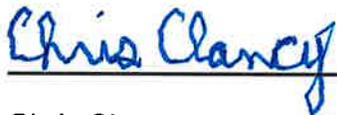
Attestation and Approval of Report

This report was approved by the Audit Committee of the Board of Directors of Panduit on August 12, 2005, pursuant to subparagraph provided in each relevant Modern Slavery Act(s):

- 11(4)(b)(ii) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chain Act
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- 16(1e) of the Australian Modern Slavery Act
- 6a of the UK Modern Slavery Act

In accordance with the requirement of the Act(s), 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 due diligence, I attest that the information on the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Chris Clancy

VP, Legal & General Counsel