

# MODERN SLAVERY, HUMAN TRAFFICKING & UYGHUR FORCED LABOR PREVENTION STATEMENT

This statement has been published pursuant to the requirements under section 54 of the UK Modern Slavery Act 2015, the California Transparency in Supply Chain Act of 2010, the Uyghur Forced Labor Prevention Act (H.R. 6256), the Canadian Forced and Child Labor in Supply Chains Act of 2024 (S-211) and EU Directive 2011/36/EU. It provides information regarding the business practices of DwyerOmega and its business units; Dwyer Instruments, LLC ("Dwyer"), Omega Engineering, Inc. ("Omega"), Automation Components Inc. ("ACI"), Miljoco-Weiss, LLC ("Miljoco") and the steps DwyerOmega have taken to ensure modern slavery and human trafficking ("MS&HT") is not taking place in its businesses and supply chains.

DwyerOmega has a zero-tolerance approach to any form of modern slavery or human trafficking. It is committed to acting ethically, with integrity and transparency in all business dealings and it is committed to implementing effective systems and controls to safeguard against any form of MS&HT in any part of its business or operations. DwyerOmega considers that the risk of MS&HT taking place within its business or supply chain is relatively low and to date, we have not uncovered any evidence of MS&HT within our business operations.

## Our Business

DwyerOmega is a diverse company; with businesses, global operations and employees located throughout the world. We recruit, develop, and promote our people based on their talent, commitment and achievement; everyone is treated equally and fairly whatever their race, color, religion, national origin, gender, sexual orientation, age, disability or background. DwyerOmega is comprised of specialized and technical businesses, and we rely on the skills and expertise of our people, many of whom are highly qualified engineers and technicians.

DwyerOmega is an established global leader in the technical marketplace, offering hundreds of thousands of state-of-the-art products for measurement and control of temperature, humidity, pressure, strain, force, flow, level, pH, and conductivity. DwyerOmega also provides customers with a complete line of data acquisition, electric heating, and custom engineered products.

## Our Supply Chain

DwyerOmega is committed to preventing MS&HT in its corporate activities, and to working with its supply chain to achieve this commitment. We are committed to promoting responsible business practices with our suppliers as outlined in more detail below. Our objective is to build long-term stakeholder value sustainably by supplying productivity-enhancing solutions and services for our customers. To achieve this, we need a global high-performance supply chain.

DwyerOmega has high standards of business conduct applicable to the whole organization. We govern the actions of our company and employees and hold them to the highest level of ethical and social accountability. Our goal is to work with suppliers who embrace and comply with the same principles as our own.

DwyerOmega places a high priority on compliance with the legislative and ethical requirements of the countries in which we operate, particularly with respect to employment practices, labor rights and equal opportunities. We have a personnel policy, which includes an onboarding process and makes mandatory a walkthrough of the company's values and commitment to Business Ethics, including whistleblowing policy and hotline, and our commitment to equality.

## Our Practices

DwyerOmega has uniform policies and procedures in place which address its MS&HT compliance requirements and standards.

Wherever possible, DwyerOmega uses a standardized sourcing agreement which includes key principles and values expected of suppliers. The standardized sourcing agreement is then tailored to specific laws governing the jurisdictions in which DwyerOmega operates.

We've also drafted a comprehensive Supplier Code of Conduct, which spells out these and other important policies for our Supply Chain partners.

DwyerOmega has a number of additional internal policies to ensure that we are conducting business in an ethical and transparent manner. The internal policies include:

- **Business Ethics:** DwyerOmega's Business Ethics makes clear to employees the actions and behaviors expected of them when representing the organization. This includes a robust approach to anti-bribery and corruption. The organization strives to maintain the highest standards of employee conduct and ethical behavior in its operations and when managing its supply chain. We make our suppliers aware of the principles of our Business Ethics and the standards we expect of them.
- **Recruitment Policy:** We operate a robust recruitment policy, including conducting checks on eligibility to work in order to safeguard against MS&HT. All our UK employees are also paid the National Living Wage, at a minimum.
- **Procurement Policy:** We conduct risk-based due diligence on our suppliers. In the event an instance of MS&HT comes to light, it is addressed, including the termination of the contract, where appropriate;
- **Whistleblowing Policy:** We encourage all workers, suppliers, customers, and other business partners to report any concerns related to the direct activities, or the supply chain of the organization. This includes any circumstances that may give rise to an enhanced risk of MS&HT. The organization's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can use the confidential helpline. The helpline can be used to report violations of Business Ethics including MS&HT in any jurisdiction. Concerns can be raised by filling out an online form or dialing the confidential helpline number.
- **Supply Chain Management:** We believe that suppliers, and other business partners, should have the opportunity to benefit from their relationship with us. In practice this means that we work together to minimize and manage business risk and improve business practices, through education, training and the sharing of good practice.

## Supply Chain Management Policy

The following outlines the requirements we have of our suppliers which include a commitment to:

- Uphold and demonstrate high standards of integrity, governance and business practice;
- Not employ workers under the school leaving age of the country of employment (other than in genuine apprenticeships);
- Not use forced or illegal immigrant labor (including modern slavery and human trafficking);
- Provide working conditions which meet expected standards on health, safety, hygiene and environmental practices;
- Pay wages and benefits which meet or exceed National Living Wage minimum requirements and adhere to working time regulations where applicable;
- Comply with DwyerOmega's standards and procedures in relation to anti-bribery and corruption;
- Not deny access to, or apply unfairly, a transparent grievance procedure;
- Not use any form of unlawful discrimination, harassment, abuse or bullying;
- Not knowingly procure specified metals/minerals that originate from facilities in conflict regions as metals should be certified as "conflict free";
- Be equally demanding of their suppliers to be able to demonstrate compliance to all of the aforementioned requirements; and
- Provide equal business opportunities for diverse suppliers.

### **DUE DILIGENCE AND SUPPLY CHAIN VERIFICATION, AUDITING AND CERTIFICATION**

In addition to due diligence processes, DwyerOmega may conduct on-site visits to investigate the specific operations of key suppliers. This allows DwyerOmega to analyze a supplier's specific practices and procedures. Where risks are identified by our on-site team during these visits this may lead to further investigations, potentially a full audit and possible termination of the supplier.

### **APPROVAL**

This statement has been examined and approved on May 7, 2024.

**Naoto Mizuta**

**President, DwyerOmega**