



Electrical Components International, Inc.'s Modern Slavery Statement

Introduction

Electrical Components International, Inc. and its business units (collectively “**ECI**”) are committed to respecting all human rights and have a zero-tolerance approach to modern slavery. This statement is made in accordance with the *Modern Slavery Act 2015*, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and other applicable laws and regulations.

ECI's Organizational Structure, Business and Supply Chains

ECI is an electrical components manufacturer with almost 18,000 employees, 30+ global locations, and more than 450 customers. Its global locations are spread across 9 countries, including Mexico, USA, China and Thailand (<https://www.ecintl.com/operations/global-locations/>). It has 2,605 direct suppliers and 2,043 indirect suppliers. Most of the goods purchased are ready-made parts from off-the-shelf. It produces electrical components for use in medical devices, home appliances, agriculture & construction, aerospace, and more.

Industrial businesses often have large, complex supply chains, and ECI is committed to ensuring adequate oversight and controls are in place to mitigate the risk of any form of modern slavery in its supply chain. ECI's compliance team holds responsibility for oversight of ECI's modern slavery risk management. Practical application and oversight of adherence to policies is managed by ECI's General Counsel. As ECI continues to grow, it will remain focused on modern slavery risk and will continue to evolve its approach to improve mitigation of this risk.

ECI's Policies Relevant to Modern Slavery

ECI has several policies in place, including a Code of Conduct and Business Ethics (“**Code**”), Supplier Code of Conduct, and Whistleblower Policy, which inform or oblige decision making and behaviors across ECI and its supply chain to reduce the risk of modern slavery, or that are relevant to modern slavery for another reason.



ECI's policies

Policy	Summary
Supplier Code of Conduct	Our supplier code of conduct requires that suppliers and their sub-suppliers do not tolerate forced, involuntary or child labor, including slavery and human trafficking. Furthermore, it requires that workers are not threatened or subjected to harsh or inhumane treatment.
Whistleblower Policy	Our Whistleblower Policy details the controls we have in place to enable colleagues to raise concerns. ECI's whistleblowing procedures allow for whistleblowing reports to be submitted 24/7, in any language and anonymously, without risk of reprisal.
Code of Conduct and Business Ethics	Our Code of Conduct and Business Ethics details our zero-tolerance approach to the abuse of human rights, including modern slavery. Our colleagues are encouraged to use our whistleblowing avenues to report any concerns about human rights issues.
Human Rights Policy	Our Human Rights Policy has no tolerance for slavery, servitude and forced or compulsory labor and requires that all colleagues comply with local laws. ECI is committed to supporting children's rights and to avoid any sort of child labor in its business operations. Furthermore, ECI commits to take a risk-based approach in performing human rights due diligence across its operations and its business units are required to implement effective and proportionate measures to identify, assess, and mitigate potential labor and human rights abuses.

Assessing and Managing Modern Slavery Risk

ECI recognizes the risk presented by new businesses that have not yet adopted ECI's approach to modern slavery risk management. To help manage modern slavery risk, ECI uses a third party know your customer ("KYC") supplier, and it uses an external ethics helpline provider where employees or third parties can submit reports 24/7. A monthly email is sent to all colleagues reminding them of the ethics helpline. In addition, ECI has regional compliance checklists for each region that monitor and audit adherence to employment laws, environmental, health, and safety regulations, training requirements, and it engages with its suppliers with the Supplier Code of Conduct. Oversight of these processes is managed by the ECI Legal Department.

Furthermore, ECI ensures regular reporting lines between its business units and



corporate office, including monthly meetings between Rosebank's General Counsel and the ECI's General Counsel, presenting regular opportunities to discuss implementation of Rosebank's compliance policies, including with respect to modern slavery, as well as any material whistleblower reports or other modern slavery related issues.

Due diligence in relation to modern slavery

ECI has due diligence controls in place. Its Procurement team provides prospective suppliers with a questionnaire, which the suppliers complete. Responses to the questionnaire allow ECI to rate the level of risk, and if the risk is too high, the supplier will not be selected. Additionally, ECI identifies modern slavery risks in its supply chain and customer base via the KYC process.

Training

ECI will provide regular and mandatory training on whistleblowing and modern slavery. Additionally, ECI trains its employees on its Code, and each new employee completes this training and acknowledges the Code as part of the onboarding process.

Monitoring and evaluation

Through ECI's governance structures and processes, modern slavery risk is constantly monitored. ECI's General Counsel is ultimately responsible for oversight of monitoring and evaluation.

ECI is developing an annual supplier survey on compliance and related policies, which will be finalized soon. The robust whistleblowing process supports monitoring and evaluation efforts, and ECI will further strengthen monitoring going forward.



Mike Balsei

Chief Executive Officer, Electrical Components International, Inc.