

MODERN ANTI-SLAVERY POLICY STATEMENT

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PURPOSE

This policy sets out Armstrong's commitment to the objectives of the Modern Slavery Act 2015 legislated in the United Kingdom.

Armstrong Fluid Technology recognizes the importance of preventing Modern Slavery from happening in our operations and our supply chain. Armstrong is committed to ensure legal compliance with all relevant regulations in this area, as well as to respect ethical standards and fundamental human rights within both our organization and our supply chain.

SCOPE

This policy applies to all Armstrong Fluid Technology employees, including full and part-time and contract employees as well as partners, suppliers, agents, associates, representatives and contractors.

POLICY STATEMENT

This statement was produced in response to the requirements of the UK Modern Slavery Act and it is to be updated and re-published annually.

We are committed to:

- Comply with legislation and regulatory requirements
- Make suppliers and service providers aware that we promote the requirements of the legislation
- Consider modern slavery factors when making procurement decisions
- Develop awareness of modern slavery issues
- Aim to include modern slavery conditions or criteria in specification and tender documents to suppliers wherever possible
- Evaluate specifications and tenders with appropriate weight given to modern slavery points
- Encourage suppliers and contractors to take their own action and understand their obligations to the new requirements
- Contact and work with the Procurement Department when looking into work with new suppliers so appropriate checks can be undertaken

Our ethical employment standards are outlined as part of the Code of Conduct included in our UK Employee Handbook. This reinforces our commitment to not using forced or bonded labour as well as no child labour. A healthy and safe working environment is also provided to all employees in accordance with international standards and national laws, alongside appropriate health and safety information and training. As our UK operations are part of a global company, these commitments are also outlined in our global Corporate Social Responsibility Policy CORP-CSR-001.

In addition to addressing these aspects in our organization, we are also taking steps to prevent Modern Slavery actions from happening in our supply chains. On a global level, Armstrong has recently embarked on a Sustainable Procurement Program which will help us ensure that we work with suppliers and subcontractors who manage the environmental and social impact of their business operations. Modern Slavery is addressed through the social tenet of this initiative, which states that we commit to ethical and transparent methods of working and we expect our supply chain partners to respect human rights as well as ethical and fair employment standards. This commitment is captured in our global Sustainable Procurement Program.

DEFINITIONS

Modern Day Slavery: Modern slavery trafficking in persons, and human trafficking have been used as umbrella terms for the act of recruiting, harboring, transporting, providing, or obtaining a person for compelled labor or commercial sex acts through the use of force, fraud, or coercion. The Trafficking Victims Protection Act of 2000 (Pub. L. 106-386), as amended (TVPA), and the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (the Palermo Protocol) describe this compelled service using a number of different terms, including involuntary servitude, slavery or practices similar to slavery, debt bondage, and forced labor.

RESPONSIBILITIES

Collective accountability for the Armstrong Modern Anti-Slavery Policy is held by the members of the global Leadership Board under the chairmanship of the Chief Executive Officer. Responsibility for the implementation of this policy is delegated from the UK Country Leader to all

managers and employees of the Armstrong businesses. Global Director, Organizational Capability is the board member with responsibility for keeping the board aware of corporate responsibility issues and progress against key performance indicators. Support is also provided by other full-time specialists covering disciplines like Organizational Capability, Procurement, Health and Safety, and Operations.

REFERENCES

Other Armstrong policies that support the interpretation of this policy include, and are not limited to:

- GOV-POL-00016 Armstrong Corporate Social Responsibility Statement
- GOV-POL-00022 Child & Forced Labour Policy
- GOV-POL-00025 Corporate Human Rights Policy
- GOV-POL-00020 Anti-Discrimination & Harassment Policy
- GOV-POL-00019 Modern Anti-Slavery Policy Statement (Global)

QUESTIONS

Employees can approach their local Procurement representative, Leadership Board member or the UK Country Leader if they have any questions about this policy.

More detailed information as well as copies of the documents mentioned are available on request by contacting Armstrong directly.

PROCEDURE DETAILS

There are no procedures directly related to this policy.

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