

December 10<sup>th</sup> 2019

## The Anti-Slavery and Human Trafficking Policy

Stormtech is opposed to all forms of human trafficking, slavery, forced or compulsory labor, and all other human trafficking activities. We are committed to achieving the highest integrity standards in all our business operations and we expect all suppliers doing business with Stormtech to share this commitment.

### Anti-Slavery Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Stormtech has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Stormtech is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the California Transparency in Supply Chains Act of 2010 and Modern Slavery Act 2015. We expect the same high standards from all our suppliers, vendors and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### Scope of this policy/Who must comply?

This policy applies to all Supply chain working for Stormtech or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, suppliers, vendors, contractors, external consultants, third-party representatives and business partners.

### Evaluation of Risk and Auditing

We conduct due diligence carrying out a specific modern slavery risk assessment in which we require all suppliers to complete the (STRT) Self-Assessment questionnaire Slavery & Trafficking Risk. Stormtech does not audit our suppliers to evaluate their compliance with this Policy but we will consider stronger measures such as auditing or third-party verification for any suppliers that it determines present greater risk

**Responsibility for this policy**

The VP of Supply Chain at Stormtech has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. One of our Compliance department member can be reached at [compliance@stormtech.ca](mailto:compliance@stormtech.ca)

The VP of Supply Chain has the primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

**Compliance with this policy.**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

**How and when to notify in case of a non-compliance**

You must notify your manager or the Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Compliance Officer.

**Communication and awareness of this policy.**

Our zero-tolerance approach to modern slavery has been distributed and communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

In addition, Stormtech has arranged training for those staff most likely to interact with suppliers with a potentially higher risk of modern slavery.

This Anti-Slavery Policy will be reviewed by the VP of Supply Chain on a regular basis and any updates will be communicated accordingly.

**Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Stormtech may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

## Going Forward

Stormtech recognizes that tackling modern slavery requires a continuing commitment and will continue to undertake due diligence in our supply chain and will review and improve procedures to help identify and prevent the risks of modern slavery or human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and The State of California's Transparency in Supply Chains Act of 2010 and has been approved on December 2019.

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Questions? Please contact us at [compliance@stormtech.ca](mailto:compliance@stormtech.ca)

