

Modern Slavery and Human Trafficking Statement 2024 for Walther Trowal GmbH & Co. KG and Affiliates

This statement is made for the fiscal year 2023 pursuant to section 54(1) of the Modern Slavery Act 2015. It explains our policy and the steps made to minimize modern slavery in our business and supply chains.

Introduction

Walther Trowal GmbH & Co. KG was established in 1931 and is a specialist in surface technology. We have customers around the globe in almost every sector of industry. We are a manufacturer of standard and special machines for surface processing and offer modular and customized system solution. In addition to our machines, we offer repair and maintenance services as well as consumables necessary to run the processes in our machines.

We are committed to preventing slavery and human trafficking occurring in any of our business activities. Traditionally, we pay fair wages and value and treat our employees as colleagues.

We are and have always been committed to uphold the highest ethical and professional standards. To obey all legal provisions applying to our business operations anywhere in the world has always been an integral part of our business policy. This commitment extends to our supply chain.

Organisational Structure and Operations

Walther Trowal GmbH & Co. KG is a provider of machines, consumables, repair and maintenance services for surface treatment, being an OEM manufacturer of our machines and consumables. We have affiliates in the UK (Walther Trowal Ltd.), the USA (Walther Trowal LLC) and Mexico (Walther Trowal S.A. de C.V., an affiliate of Walther Trowal LLC).

Our main operations are machines (for mass finishing, cutlery cleaning, coating, shot blasting and specialized wastewater pre-treatment), including repair and maintenance services, and consumables.

Machine manufacturing takes place solely at Walther Trowal GmbH & Co. KG at our site in Haan, Germany. Consumables production takes place at our Haan site, Germany, for resin-bound abrasive media, liquid and solid compounds and drying media, and at the Stoke-on-Trent site, UK, of Walther Trowal Ltd. for ceramic-bound abrasive media.

Gleitschleiftechnik • Strahltechnik • Prozesswassertechnik • Kleinteilbeschichtung

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Repair and maintenance services are provided at all sites.

We are a medium-sized company and employ, including our affiliates, more than 70% of our staff in Germany, approximately 15% of our staff in the UK, and the remaining staff in the USA and Mexico.

Commitment to Human Rights and the Principles of the Modern Slavery Act 2015

Walther Trowal GmbH & Co. KG, including our affiliates, is committed to the principles of the Modern Slavery Act 2015, Article 3 of the Convention Nr. 182 of the ILO, and all conventions and principles quoted in § 2(2) of the Supply Chain Act (Lieferkettensorgfaltspflichtengesetz – LkSG) of Germany. We will not tolerate modern slavery and human trafficking in our organisation or in our supply chain.

As an equal opportunity employer, we are committed to creating and ensuring a working environment where all of our staff are treated respectfully and without discrimination. Payment and assignment of duties are based solely on a person's qualifications and expertise.

Our staff can report any violation of laws or ethics without any risk to themselves. To assure this, we operate a whistleblower portal, which also allows anonymous reports, in full compliance with the German Whistleblower Protection Act (Hinweisgeberschutzgesetz – HinSchG) and Directive (EU) 2019/1937, in addition to our traditional open door policy of the management. The whistleblower portal is also open to any external stakeholder and can be accessed on our homepage.

We have internal regulations in place to ensure that our staff is aware of all legal and ethical expectations. The most important document is our Internal Code of Conduct, which explains our business and ethics policy in an understandable language. The code of conduct and other internal regulations and guidelines are revised on a regular basis, at least annually. Staff feedback is taken into consideration for the annual review.

Our suppliers are informed of our company policy, including the prohibition of modern slavery and human trafficking, by our Supplier Code of Conduct.

We determine the risk to human rights, environmental protection and other legal and ethical issues in our supply chain by a country- and branch-based approach. This means that we check annually in which countries our direct suppliers are based and which branch they belong to. In the next step, we check available sources of information, i.e. MVO Nederland. Based upon the specific risk for each country/branch combination and the intensity of our business relationship, we may contact our suppliers for additional information on their business

operations, i.e. a self-assessment. Should we receive any information regarding a violation of our Supplier Code of Conduct through our whistleblower portal or from other sources, we will investigate and possibly contact the supplier for a statement. A re-assessment of risk will inevitably occur in such a case and, if the risk for severe violations of human rights, environmental protection or other important legal or ethical provisions, is considered too high, we will reconsider our business relationship to that supplier in general, up to a cancellation of business.

Our recruitment processes and human resource management are designed to ensure that all employees, including prospective employees, are legally entitled to work at the respective site. Where applicable, proper and legally allowed checks (work permits, DBS checks, SSN etc.) will be executed.

In general, our assessment of internal and external risks with regard to human rights and environmental risks at the level of Walther Trowal GmbH & Co. KG are based on the provisions of the German Supply Chain Act.

We will not do business with any organisation, regardless of where it is based, that knowingly supports or is found to be involved in slavery, servitude or forced or compulsory labour. The same applies to organisations which knowingly violate human rights or fail to comply with environmental regulations.

In addition to modern slavery and human trafficking provisions, we fully comply with the Bribery Act 2010 and the Foreign Corrupt Practices Act. At the sites where legal permits for environmental protection are required, these are available.

Our staff are trained on a regular basis and when relevant laws have changed significantly on all compliance-related topics relevant to the respective position. Training includes awareness of modern slavery, human trafficking and corruption (which is often related to modern slavery and human trafficking), although it is not limited to these topics.

Policies Relating to Slavery and Human Trafficking

Our anti-slavery policy is part of our codes of conduct and posted on the staff intranet in the Internal Code of Conduct, together with all other company policies and procedures. It reflects our commitment to implementing and enforcing effective procedures and controls to minimize risks of modern slavery and human trafficking infiltrating our business operations, and to act ethically and with integrity in all our business relationships and activities.

According to our country- and branch-based risk assessment and the procedures implemented, we assess ourselves to have a low risk of modern slavery or human trafficking in our business and supply chains.

Previous Action

Our Supplier Code of Conduct was completely rewritten, with more detail and in more precise language, and key suppliers were identified and subject to a specific assessment. With the necessary adjustments to supply chains after the COVID pandemic, new suppliers were also subject to specific anti-slavery and environmental protection requirements, in addition to many other legal and ethical provisions. In our review of our Supplier Code of Conduct in 2023, the provisions of the Modern Slavery Act and the German Supply Chain Act were implemented in a clearer and more understandable way. Our UK and US sites have been audited internally and found to be in full compliance with all our CSR and ESG policies.

Current Action

The previous action has proven to be effective and we have no indication of any non-compliance. Therefore, no major action is planned for the following year. Instead, we will monitor the effectiveness and success of all implemented processes and other actions. Should adjustments be necessary, we will adjust.

This statement has been approved by the management board of Walther Trowal GmbH & Co. KG, Konrad Stadler (Managing Director) and Christoph Cruse (Sales Director & CMO).

The statement will be reviewed and updated every year.