

THE FLEXITALLIC GROUP'S STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

Introduction

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. The Flexitallic Group and its subsidiaries, Flexitallic, Ltd., Flexitallic, L.P., Flexitallic GmbH, SIEM, Flexitallic Gasket Technology (Suzhou) Co., Ltd. and Flexitallic, L.L.C. (collectively "Flexitallic") have a zero-tolerance approach to modern slavery and are collectively committed to improving their practices to combat all forms of modern slavery and human trafficking from occurring within both their business operations and their supply chain. Flexitallic imposes those same high standards on its contractors, suppliers and other business partners.

Organizational Structure

Flexitallic is the international market leader in the manufacture and supply of static sealing solutions, delivering industrial gaskets on a global scale.

Developer of the spiral wound gasket in 1912 in the US, Flexitallic has built on this legacy of innovation with revolutionary product materials such as Thermiculite® and Sigma®. Flexitallic has a global customer service network of owned manufacturing facilities, manufacturing licensees and a global network of distributors in 30 countries. This ensures local demand is met quickly, providing a combination of the highest product quality and outstanding customer service.

The varied product offering of Flexitallic includes spiral wound gaskets, semi-metallic gaskets, RTJ gaskets, Kammprofiles, sheet gaskets and dynamic and static packings. Drawing upon its rich history and present day values of leadership, quality, service and technology, Flexitallic is at the forefront of developing sealing solutions for industries around the world.

Supply Chains

Flexitallic's supply chains include the following:

- Wires and sheets made of stainless steel, carbon steel and a wide variety of alloys
- Flexible graphite, PTFE, organic and inorganic fibers, and polymers used as filler and sheet materials
- Ring type joints
- Metal fasteners
- Chemically exfoliated vermiculite
- Shipping and transportation services and
- Specialized equipment suppliers

Flexitallic has undertaken an initial high-level assessment of its contracts, identifying where its supply chains extend into sectors and territories that are high-risk in terms of potential presence of modern slavery and human trafficking. This assessment also includes training Flexitallic's management employees who are involved in or responsible for procurement activities, the selection and approval of contractors and vendors, Flexitallic's human resources personnel, and Flexitallic's senior management regarding the risks of modern slavery and human trafficking, the means to identify, mitigate and hopefully eliminate those risks in Flexitallic's operations and its supply chain going forward, and the requirements of the Modern Slavery Act 2015.

Flexitallic's Policies

Flexitallic has in place policies addressing its procurement activities, human resources, qualification of vendors and contractors, ethics, anti-corruption, bribery and the protection of whistleblowers. Through these existing policies, Flexitallic has also demonstrated and committed to acting ethically and with integrity in all of its business relationships. In conjunction with these existing policies, the assessment and training described above have enabled Flexitallic to confirm its commitment to compliance with the Modern Slavery Act 2015 as of the date of this Statement and going forward.

Due Diligence Processes

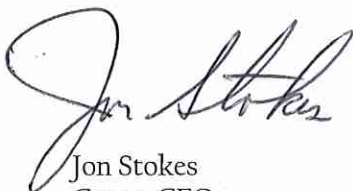
As a consequence of its existing policies and the assessment described above, Flexitallic has taken the following actions to identify and mitigate risks related to modern slavery and human trafficking:

- Made its subsidiaries, and their collective employees and staff aware of the Modern Slavery Act, including its definitions of slavery and human trafficking through specific training incorporated into the regular periodic compliance training Flexitallic provides;
- Advised its subsidiaries, and their collective employees and staff what to do, if they suspect a case of slavery or human trafficking;
- Contacted its suppliers and partners in sectors and territories that are high-risk in terms of potential presence of modern slavery and human trafficking to determine the assurance arrangements they have in place;
- Commenced a revision of its procurement contracts and related documents to include prohibitions in respect of slavery and human trafficking and compliance with Modern Slavery Act 2015 and similar legislation; and
- Reviewed its compliance and reporting policies, including but not limited to whistleblowing.

The above procedures are designed to:

- Identify and assess any potential risk areas in our business and supply chains;
- Reduce the risk of slavery and human trafficking occurring in Flexitallic's business operations and supply chains;
- Monitor potential risk areas in Flexitallic's business operations and supply chains; and
- Provide adequate protection for whistle-blowers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Flexitallic Group's slavery and human trafficking statement.



Jon Stokes
Group CEO
The Flexitallic Group, SAS

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