

Modern Slavery Policy

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

Ludlum Measurements, Inc (LMI) takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships. We expect the same high standards from all of our contractors, suppliers, and other business partners, and as part of our contracting processes, in the coming year we will 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 our suppliers to hold their own suppliers to the same high standards.

This policy applies to all individuals who work for LMI or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

Responsibility for the Policy

The Owners and Executive Officers have overall responsibility for ensuring this policy complies with all legal and ethical obligations established by federal, state, and LMI's laws. They are responsible to ensure that all individuals involved with LMI comply. Human Resources, Safety Officers, and Managers have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries. This will ensure that LMI is effective in countering modern slavery.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training to understand modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the HR Director.

Compliance for the Policy

Employees must ensure that they 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 all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their supervisor or an executive officer as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees 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 they believe or suspect a breach of this policy has occurred or that it may occur, they must notify their supervisor or upper management.

Staff should note that where appropriate, and with the welfare and safety of local workers as a priority, LMI will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains. If staff are unsure about whether a particular 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, they are expected to raise it with their supervisor or upper management. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if their concerns turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery may be taking place in any part of our business or any of our supply chains. Detrimental treatment includes dismissal, disciplinary actions, threats, or other unfavorable treatment connected with raising a concern. If staff believe that they have suffered any such treatment, they should inform their supervisor immediately. If the matter is not remedied, and they are an employee, they should raise it formally using the company open door policy, which can be found in the current employee handbook. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breach of this Policy

Any employee who breaches this policy will face disciplinary action up to and including termination and may face legal repercussions. We may terminate our relationship with individuals and organizations working on our behalf if they breach this policy.