



Transparency and Modern Slavery Statement

DUBOSE STRAPPING, Inc. welcomes the transparency that the *California Transparency in Supply Chains Act* (SB 657), the *UK Modern Slavery Act of 2015*, and the *Australia Modern Slavery Act of 2018* require. We are committed to combating slavery, forced labor, human trafficking, and other unlawful and/or unethical practices throughout our business and our supply chains.

In alignment with the regulations of the *California Transparency in Supply Chains Act* (SB 657), the *UK Modern Slavery Act of 2015*, and the *Australia Modern Slavery Act of 2018*, the following document discloses DUBOSE STRAPPING, Inc.'s policies and actions relating to slavery and human trafficking in business and the supply chain.

DUBOSE STRAPPING, Inc. defines modern slavery, human trafficking, and the worst forms of child labor as conduct that would constitute (1):

1. An offense under Division 270 or 271 of the Australia Criminal Code; or
2. An offense under either of those Divisions if the conduct took place in Australia; or
3. Trafficking in persons, as defined in Article 3 of *The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children*, supplementing the United Nations Convention against Transnational Organized Crime, done in New York on 15 November 2000.
4. The worst forms of child labor, as defined in Article 3 of the ILO Convention (No. 182) concerning *The Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour*, signed in Geneva on 17 June 1999.

**Definitions taken from Meeting the UK Modern Slavery, Australian Modern Slavery, and California Transparency Laws American Apparel & Footwear Association, June 2019, Page 14 of 18.*

Code of Conduct and Contractual Clauses

As detailed below, DUBOSE STRAPPING has developed and issued a supplier code of conduct that states that we prohibit human trafficking and/or slavery in our supply chain. Also, in our supplier agreement, suppliers are required to confirm that they have not faced investigations or convictions related to corruption or breaches of human rights laws and standards.

Additionally, suppliers must implement transparent due diligence programs to ensure that neither their factories nor suppliers are engaged, directly or indirectly, in practices associated

with slavery or human trafficking. This emphasizes our commitment to maintaining ethical standards and fostering responsible business practices across our supply chain.

1. Company Information

DUBOSE STRAPPING, Inc. has ties to the strapping industry dating back to the late 1960's. DUBOSE STRAPPING, Inc. is a third-generation family-owned company headquartered in Clinton, NC, with facilities in Crawfordsville, IN.

DUBOSE STRAPPING is classified as a private, Incorporated company and does business in the strapping industry, producing and selling steel and plastic strapping and various packaging solutions. DUBOSE STRAPPING manufactures steel and plastic strapping using automated strapping machines, various strapping materials, hand application tools, and accessories.

DUBOSE STRAPPING sells its products directly and only in the US market, owns three manufacturing facilities, and no manufacturing is outsourced. Our Steel and Plastic strapping manufacturing and Paper solutions facilities are in Clinton, NC; Steel manufacturing facility is in Clinton, NC & Crawfordsville, IN.

In 2023, the DUBOSE STRAPPING supply chain consisted of 1,083 materials and component suppliers (primarily located in the USA).

2. Our Commitment to Human Rights

At DUBOSE STRAPPING, Inc. we are firm in our commitment to eradicating slavery, forced labor, and human trafficking from every facet of our supply chains and business operations. Our employees play a crucial role in upholding the core values of excellence, integrity, and social responsibility encapsulated in our Responsible Business Policy. We actively foster a culture where employees feel empowered to report any conduct they perceive as unlawful or unethical within our business or operations.

Furthermore, we hold our suppliers to the utmost legal and ethical standards, demanding operations that are free from discrimination, slavery, forced labor, and human trafficking. This collective commitment underscores our dedication to ensuring ethical practices and social responsibility throughout our network.

3. DUBOSE STRAPPING, Inc. Conducts Regular Supply Chain Risk Assessments. To prevent trafficking, slavery, and the worst forms of child labor in our supply chains, DUBOSE STRAPPING, Inc. monitors its primary supplier's social performance by reviewing the results of annual audits. Our suppliers are notified of non-conformance concerns, and corrections, including follow-up reviews, are monitored appropriately to ensure that standards are met.

In conducting our risk assessment, DUBOSE STRAPPING, Inc. also utilizes intelligence from a wide variety of sources, including the U.S. government (*third-party assessments, internal assessments, or use of third-party sources like the State Department's Human Rights and/or Trafficking in Person reports, U.S. Department of Labor reports, press reports, etc.*)

DUBOSE STRAPPING, Inc. recognizes the potential risk of slavery, human trafficking, and/or the worst forms of child labor within the strapping industry's materials-extracting processes. However, DUBOSE STRAPPING, Inc. firmly asserts that it does not believe such unethical practices exist within our supply chain. If evidence suggests otherwise, we are committed to thoroughly investigating and taking immediate corrective action to uphold our zero-tolerance policy against slavery, human trafficking, and the worst forms of child labor.

4. DUBOSE STRAPPING, Inc. Policies Addressing Human Trafficking, Slavery, and Child Labor In our Supply Chain:

- DUBOSE STRAPPING, Inc. has developed and issued a code of conduct and a Social and Environmental Program for our direct suppliers that states that we prohibit human trafficking, slavery, and the worst forms of child labor in our supply chain.
- DUBOSE STRAPPING, Inc. also takes steps to push these policies further up the supply chain through the DUBOSE STRAPPING, Inc. vetting and onboarding process, DUBOSE STRAPPING, Inc. audit process, and DUBOSE STRAPPING, Inc. remediation process.
- In the case of non-compliance, DUBOSE STRAPPING, Inc. maintains the right to examine the specific situation and develop the best possible strategy for resolution. If non-compliance cases are not resolved promptly, DUBOSE STRAPPING, Inc. may terminate the business relationship. While DUBOSE STRAPPING, Inc. wishes to aid in the resolution of incidences of human trafficking, slavery, and the worst forms of child labor within the DUBOSE STRAPPING, Inc. supply chain, it is not possible to effectively solve the issue of noncompliance without the cooperation of our suppliers.

5. DUBOSE STRAPPING, Inc. receives certification from direct suppliers by supplier signatures of our *Supplier Code of Conduct* and our *Suppliers Agreement* that products and materials comply with the slavery, human trafficking laws, and worst forms of child labor laws of the countries in which they operate.

6. DUBOSE STRAPPING, Inc. maintains and enforces internal accountability procedures for employees and contractors who fail to meet company standards to prevent the incidence of slavery, human trafficking, and the worst forms of child labor in its supply chain.

DUBOSE STRAPPING, Inc. practices due diligence in maintaining these standards including a Contractor vetting and onboarding process, contractor audit process, and remediation process.

7. DUBOSE STRAPPING, Inc. conducts internal training on the DUBOSE STRAPPING, Inc. Supplier Code of Conduct to ensure the necessary participants in supply chain management are knowledgeable and aware of the issues and concerns surrounding the supply chain, including human trafficking, slavery, and the worst forms of child labor, with a particular focus on mitigating risks.

DUBOSE STRAPPING, Inc. also encourages employees involved in our procurement department to participate in training programs on social compliance issues, slavery, human trafficking, and the worst forms of child labor.

DUBOSE STRAPPING, Inc. will continue to assess, develop, and extend our approach to our human trafficking, slavery, and the worst forms of child labor eradication efforts. We will continue to work with our suppliers, factories, and other partners to reduce the risks of modern slavery wherever they occur.