TOR COATINGS

Providing Practical Solutions

Modern Slavery Statement 2024 – 2025

The Modern Slavery Act 2015 requires all UK businesses with a total annual global turnover of £36m or more to produce a slavery and human trafficking statement each financial year.

Modern slavery is a term which encompasses slavery, servitude and forced or compulsory labour. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

This statement sets out the steps that TOR COATINGS has taken during the financial year 2023-2024 to ensure that modern slavery and human trafficking is not occurring within the organisation or in its supply chains.

No instances of modern slavery have been identified in our operations or supply chains during FY24.

Organisation Structure & Supply Chains

TOR COATINGS is a manufacturer & supplier of specialty coatings, sealants and building materials in the building & construction sector. We are a part of the CONSUMER DIVISION, and our ultimate parent company is RPM International Inc.

RPM International Inc. is headquartered in Medina, Ohio in the United States of America.
Shares of RPM's common stock are traded on the New York Stock Exchange.

RPM International Inc. was founded in 1947, is a $7.3 billion, multinational company with subsidiaries that are world leaders in specialty coatings, sealants, building materials and related services. From homes and workplaces to infrastructure and precious landmarks, RPM's market-leading brands are trusted by consumers and professionals alike to help build a better world. RPM has sales in over 170 countries and has over 17,000 employees worldwide. RPM strives to create a diverse and inclusive culture everywhere it operates.

RPM's global supply chain consists of direct product suppliers, providing key commodities, raw materials, packaging and suppliers of non-product goods and services. The raw materials, components, items, and systems required to manufacture RPM's products and construction solutions are procured from suppliers around the world and vary from product to product.

RPM currently does business with approximately 5,000 product suppliers located in 50 countries and approximately 50,000 non-product suppliers worldwide. Approximately, 90% of all purchases are with RPM's top 100 suppliers.

TOR COATINGS is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains, including those of its sub-contractors and partners, are also free from slavery and human trafficking.

TOR COATINGS acknowledges its responsibility to the Modern Slavery Act 2015 and the requirement to ensure transparency within the organisation and with their suppliers of goods and services.

- Risk Assessments: performed by RPM International Inc. on request of any RPM affiliate;
- Investigations/due diligence: to identify and assess the potential risks in the supply chain, performed by CONSUMER DIVISION / RPM International Inc Legal and Compliance teams or by individual departments;
- Risk Planning: creating action plans to address risk of modern slavery;
- Review of Supplier Contracts: review of the organisations purchasing policy to identify opportunities to mitigate or reduce any risks of modern slavery;
- In line with our Third-Party Due Diligence Policy, RPM conducts comprehensive Third-Party Due Diligence prior to engaging with new third parties. Initial reviews based on the third-party operational risk profile are conducted, including an assessment of industry, size, geographical location, and nature of third-party relationship.
- RPM has taken measures to strengthen its pre-existing Third-Party Due Diligence process throughout its supply chain by implementing a tailored screening system to identify and mitigate risks associated with its supply chain. Modern slavery risks are encompassed in this process, including both a World-Check screening to assess risk of specific breach of international laws and sanctions and Adverse Media-Check screening to assess additional reputational or integrity risk.

In addition, TOR COATINGS Hotline and Non- retaliation Policy encourages all its employees, customers, and other business partners to report any concerns relating to the direct activities of its organisation or its supply chain without any retaliation, which includes the reporting of any circumstances that may give rise to a risk of slavery or human trafficking. The Hotline and Non-retaliation Policy is designed to make it easy for employees to make disclosures without fear of retaliation. TOR COATINGS General Terms and Conditions of Purchase states (section 10: Compliance with Laws & Policies etc.) that the *"Supplier represents and warrants that no Goods supplied under this PO will be manufactured by child or slave labour or by victims of human trafficking, and that Supplier complies with internationally recognized best practices to prevent and identify child, slave labour and human trafficking."*

TOR COATINGS endeavours to carry-out its own recruitment activities and/or to only use reputable employment agencies to source labour and complete appropriate background checks. Personnel responsible for the recruitment activities in any of the TOR COATINGS business divisions are advised to adhere to this Policy by ensuring that strict verification of the potential employee's right to work is carried-out before any offer of employment is made.

TOR COATINGS expects its subsidiaries, sub-contractors, and supply chain vendors to adhere to recruitment practices that ensure employment is voluntary. Where necessary and if required, demonstration of compliance with this Policy may be requested.

Risk assessment and management.

As part of our initiative to identify and mitigate risk, TOR COATINGS has systems in place to:

- Identify and assess potential risk areas in the TOR COATINGS supply chains.
- Mitigate the risk of slavery and human trafficking occurring in the TOR COATINGS supply chains.
- Monitor potential risk areas in the TOR COATINGS supply chains.
- Protect employees who report instances of modern slavery in line with the Hotline and Non-retaliation Policy.

All processes, procedures & system are reviewed and approved annually by senior management as part of TOR COATINGS on-going commitment to the Modern Slavery Act 2015.

KPI's to measure effectiveness of steps taken:

The following key performance indicators (KPIs) are used to measure effectiveness in ensuring that slavery and human trafficking is not taking place in any part of the business or its supply chains:

- Requirement for all departmental managers, HR professionals and relevant purchasing and supply chain employees to complete training on modern slavery Regulations.
- Periodic reviews of existing supply chains, whereby the organisation evaluates existing suppliers through continuous monitoring, in line with TOR COATINGS third party due diligence policy.
- Periodic business reviews including sourcing of raw materials and third- party supplier contracts.

Training on modern slavery and trafficking

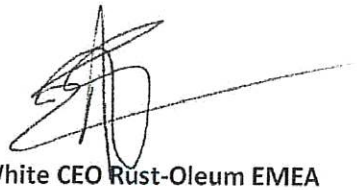
To ensure a high level of understanding of the risk of modern slavery and human trafficking in TOR COATINGS supply chains and business, training will be provided to all employees.

TOR COATINGS also requires its vendors to communicate the expectations as outlined in RPM's Supplier Code of Conduct to all its employees. In line with the Supplier Code of Conduct, TOR COATINGS reserves the right to audit should there be sufficient reason to suspect non-compliance.

This statement and accompanying policies are made available to all employees when joining TOR COATINGS. Any changes are communicated across TOR COATINGS and training provided if required.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our TOR COATINGS **slavery and human trafficking statement.**

Signed:



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9/9/24

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