

2023

## UK Modern Slavery Act Transparency Statement

Financial year 2022

This statement is made pursuant to section 54(1) of the Modern Slavery Act, 2015, and constitutes our slavery and human trafficking statement for the financial year ending in 2022. It sets out the steps that GUARDIAN has undertaken, and continues to do so, to reasonably ensure that no modern slavery or human trafficking is taking place within our business or supply chains.

### **OUR COMPANY**

Guardian is a part of the Koch Industries group of companies. Guardian Glass, is one of the world's largest manufacturers of float, coated and fabricated glass products. At its 24 float lines around the globe, Guardian Glass produces high performance glass for use in exterior (both commercial and residential) and interior architectural applications, as well as transportation and technical products. Guardian glass can be found in homes, offices, cars and some of the world's most iconic architectural landmarks. The Guardian Glass Science & Technology Center continuously works to create new glass products and solutions using the most advanced technology to help customers see what's possible™. Visit [guardianglass.com](http://guardianglass.com)

### **OUR VALUES & THE KOCH STEWARDSHIP FRAMEWORK**

Koch companies subscribe to a management framework, Principle Based Management™, that is based on proven principles of human progress and a deep appreciation for the dignity of every individual. Our focus on individuals and bottom-up solutions rather than top-down imperatives is evident in our Stewardship Framework and drives our approach to Environmental, Social, and Corporate Governance (ESG).

#### **From our Stewardship Framework:**

At Koch, stewardship encompasses the responsible management of our actions and the resources entrusted to our care in a manner that respects the rights of others. By "rights," we mean everyone's right to their own life, liberty, and property, and equal treatment under the law.

### **CODE OF CONDUCT**

With specific regard to the need to combat human trafficking and modern slavery in all of its forms, Chapter 2 of our Code of Conduct concerns "Respect for Others" and states:

#### **Commitment to Lawful Employment Practices**

Our companies strive to make people's lives better through the products we make, support for the communities in which we live and work, maintaining quality work environments, and sourcing responsibly. We are committed to adhering to applicable employment and labor laws everywhere we operate. This includes observing those laws that pertain to child labor, forced labor, human trafficking, wages and work hours and freedom of association. In addition to other expectations contained in this Code, our commitment to social responsibility specifically includes the following:

**Child Labor** - The company will not employ underage individuals as defined by applicable child labor laws. Employees will not be permitted to work in a position where they are younger than the minimum legal age for employment in that job.

**Forced Labor** - The company does not support the use of forced labor or involuntary prison labor. Recruiting and selection activities are conducted in compliance with applicable law and any applicable collective bargaining obligations.

**Wages and Work Hours** - The company is committed to meeting all minimum wage obligations and collective bargaining agreements regarding maximum hours, minimum wage, overtime work and the payment of overtime compensation.

**The company:**

- Recognizes an employee's right to breaks and meal periods required by applicable law or collective bargaining agreement and the company will pay for those breaks wherever required by law.
- Will provide to employees all periods of leave to which they are entitled under applicable law.
- Will provide employees with all benefits to which they are entitled under applicable law. We make compliance with the above requirements the responsibility of every employee, as our Code of Conduct explains.

**EMPLOYEE TRAINING**

Every employee has the responsibility to:

- Always act in accordance with applicable laws, this Code, Our Values and other company standards, policies, procedures, practices, guidelines and work rules.
- Avoid any activity that might have the appearance of being illegal or unethical.
- Seek a full understanding of compliance requirements, risks and key controls that apply to your role. No one is expected to know every policy or standard word for word, but you should understand the policies and standards that apply to your role.
- When you have questions, seek assistance from the many resources that are available to you. Promptly report potential or actual violations of a law, company policy or standard, or any request to violate a law, company policy or standard.
- Promptly report any issue that you believe has not been appropriately resolved, even if it means raising it with another available resource.
- Cooperate completely and honestly with company investigations.

If GUARDIAN were to become aware of modern slavery within our company, we would take immediate action.

**OUR SUPPLY CHAINS & THEIR ADHERENCE TO OUR VALUES**

We rely on our suppliers sharing our values and always complying with all laws. We expect our business partners to treat people with dignity and respect and not to engage in practices associated with forced labor, even if not illegal in their locations. To ensure that modern slavery is not occurring within our supply chains, we make reasonable efforts to know our suppliers and their work practices, including their reputations for legal compliance and respect for human rights. We will act to discontinue relationships with those suppliers and other third parties who fail to meet our high standards for lawful and ethical conduct.

All Third Parties go through various screening processes based on the perceived risk of the interaction. Part of the program focuses on enhanced vetting for Third Parties in high-risk jurisdictions. Our suppliers, distributors, and agents may conduct business in locations that are known to have elevated risks,

specifically we have business dealings in {countries with elevated risks where business dealings take place, if any}. There is no widely known risk of human trafficking or slavery in the industry, however locations where we have business could have an elevated risk regardless of the industry.

In continuous efforts to ensure that modern slavery is not taking place in our supply chains Guardian has developed several new contract templates which include a statement by which Guardian suppliers certify that their business and supply chain are maintained in a lawful and socially responsible way including, among other things, that neither human trafficking nor slavery or forced labor takes place in any part of their business, and that they do not use slavery or forced labor in any of its forms, including human trafficking. That new contract templates are now used with all new suppliers to Guardian.

Besides that, Guardian has obtained assurances from its biggest MRO suppliers serving Guardian UK operations that they do not use forced labor in the course of manufacturing products for or providing services to Guardian. In addition to these steps, Guardian offers a Compliance & Ethics Helpline which provides employees, customers, suppliers, and members of the general public with a mechanism, including on an anonymous basis (where allowed by law), to report concerns about potential breaches of Guardian's Code of Conduct, a Guardian policy, or the law.

Further, if we were to become aware of modern slavery within our supply chain, we would take further action which could include requiring a corrective action plan, or if necessary, termination of the relationship with that supplier where there was a failure to adhere to UK law.

## **PUBLICATION**

A copy of this statement can be accessed at GUARDIAN's website [www.guardianglass.com](http://www.guardianglass.com)

## **APPROVAL**

This statement is made and reflects the position of GUARDIAN, pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending in 2022. It is approved by the Governing Board and signed by our director, as shown below.

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Christopher Stuart Duguid, Director  
Guardian Industries U.K. Limited

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Gustav Boekhoudt, Chairman of the Board  
Guardian Europe S.à r.l.