



Prevention of Modern Slavery Policy

1. **Introduction.** Each of Revere Copper Products, Inc. and Revere South, Inc. (collectively, “Revere”) is committed to the global fight against child labor, modern slavery and human trafficking. Revere understands the devastating impact of these practices on individuals and communities worldwide. This Prevention of Modern Slavery Policy (“Policy”) provides a framework for preventing and combating these practices in all aspects of Revere’s operations, underpinning Revere’s commitment to human rights, integrity, social justice, diversity, and inclusion.
2. **Values Statement.** Revere is guided by values of accountability, integrity, empathy, and collaboration. To achieve its mission, it is imperative that everyone employed by Revere demonstrate honesty, lawfulness, respect, and fairness.
3. **Purpose.** The purpose of this Policy is to outline the forms of modern slavery and provide guidelines on its prevention. Modern slavery occurs when vulnerable people are exploited for personal gain or commercial profit. Practices that constitute modern slavery may include, but are not limited to, human trafficking, slavery, servitude, forced labor, debt bondage, forced marriage, child labor, orphanage trafficking and exploitation of children in institutional care settings.
4. **Scope.** This Policy applies to Revere, Revere’s suppliers, and all persons working for Revere or on Revere’s behalf in any capacity, including but not limited to board members, employees, directors, volunteers, interns, contractors, consultants, vendors, suppliers, and business partners.
5. **Policy Statement and Principles.** This Policy outlines the measures undertaken by Revere to ensure its business practices are free from modern slavery. Revere is guided by principles of freedom and respect for human rights as provided under the United States Constitution. Revere is committed to the prevention of modern slavery across all operations in accordance with the applicable Federal and State labor laws. Revere will take action to ensure that new forms of modern slavery can be identified, evaluated, and addressed in compliance with all applicable labor law standards.
6. **Procedures.** Revere acknowledges that the drivers of modern slavery are closely related to unethical and illegal business conduct, poverty, unequal power dynamics, and gender inequalities. To promote and work towards sustainable development, Revere will ensure that identification and mitigation of modern slavery risks are a part of its organization. This includes the following measures:
 - a. Conducting risk assessments and analyses of Revere’s operations and product supply chains to evaluate and address risks of modern slavery is conducted by Revere during the qualification process for new critical to quality and raw material suppliers and not a third party.
 - b. Regarding evaluation of supplier compliance with company standards for modern slavery in supply chain: While Revere does not audit suppliers, suppliers are required to attest to protections against modern slavery in their supply chains by accepting Revere’s Purchase Orders.
 - i. By accepting Revere’s Purchase Orders, suppliers and vendors are contractually obligated to comply with Revere’s additional standards outlined in this policy.



Prevention of Modern Slavery Policy

- c. Maintaining a recruiting process that ensures all employees are hired at fair market and competitive wages or through our collective bargaining agreement rate structure. Employees are instructed to report any violations of these procedures through their chain of command or using Revere's "Open Door Policy" by informing Human Resources.
 - d. All Revere employees receive training on this Policy as part of the new hire onboarding process. Members of the procurement team are expected to take appropriate actions up to up to and including disengagement actions in the event that a supplier is identified as not meeting Revere's modern slavery and human rights standards.
7. **Roles and Responsibilities Revere's CEO and Executive Team.** Revere's CEO and Executive Team are responsible for approving and implementing this Policy, fostering a culture of prevention, managing risk, addressing issues, and ensuring employees understand their responsibilities related to the prevention of modern slavery. Executive Department Heads are responsible for ensuring their operations do not engage in prohibited practices, for assessing and managing related risks, and for reporting concerns to the Executive Leadership Team. Human Resources is responsible for ensuring compliance with and conducting periodic reviews of this Policy and reporting any identified instances of modern slavery to the CEO and Executive Team.