

MODERN SLAVERY STATEMENT

MiTek Inc. (the “Company”) and its affiliates stand against slavery, servitude, or forced or compulsory labor and ask their business partners to do the same.

A. Risk Assessment

As part of its due diligence program:

1. The Company will regularly review its practices and collaborate with external counsel in regard to human rights to remain updated on new trends, legislation and practices relevant to its operations. The Company will then share this information with the rest of the organization through its policies and training. Lastly, the Company will use this information to strengthen its due diligence program related to modern slavery.
2. The Company will conduct a review of any suppliers that operate in countries with a higher risk of modern slavery, as published at <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> and <https://www.walkfree.org/global-slavery-index/downloads/>, review the modern slavery statements of suppliers, and understand the risks that they have identified.
3. The Company will assess compliance at different stages of the procurement process through screenings of new suppliers. Additionally, the Company will implement compliance clauses in its contracts, and conduct due diligence on high-risk suppliers.
4. The Company will assess its effectiveness in managing modern slavery and human rights risks by tracking its actions and outcomes, consulting with other entities or experts on best practices in managing modern slavery risks, and evaluating how well the Company’s efforts are working.

B. Company Business and Structure

MiTek exists to transform the building industry with better building solutions through its global offerings of integrated software, services, engineered products, and automated solutions that enable its customers to transform the way they design, make and build. The Company operates under its guiding principles of courage, innovation, unity and stewardship.

Owned by Berkshire Hathaway since 2001, the Company has approximately 5,800 employees worldwide (as of June 2023). The Company operates in 18 countries, including the United States, Canada, the United Kingdom, Germany, France, Sweden, Finland, Poland, Czechia, Latvia, South Africa, Australia, New Zealand, Vietnam, Philippines, Japan, Singapore, and the Republic of Korea.

The Company has appointed its General Counsel as its senior compliance officer. This officer will take appropriate steps to ensure not only the Company’s compliance with the modern slavery statement, but also that the Company’s values are adhered to by its suppliers, subcontractors, and other business partners on a global scale.

The Company operates in Australia as MiTek Australia Ltd., which offers software, engineered products, services, and automated manufacturing equipment, as well as estimating, drafting, takeoff, and structural design services for the residential construction industry. MiTek Australia Ltd. is the parent company of Buildsoft Pty Ltd. and MiTek Vietnam Co. Ltd.

The Company operates in the UK as MiTek Industries Limited., which specializes in the development of software solutions for structural timber engineering and the provision of steel connector products for its floor and roofing systems, and designs, manufactures and installs custom industrial mezzanine systems.

The Company's operations in California include the supply of software, engineered products, services and automated manufacturing equipment for the residential construction industry through MiTek Inc., the provision of structural curtainwall systems and related services through Benson Industries, Inc., and the licensing of steel frame design and construction through Sideplate Systems, Inc.

The Company operates in Canada as MiTek Canada, Inc., which offers stamped metal connectors and hardware, engineering and software services, and automated manufacturing equipment for the residential construction industry.

C. Supplier Audits and Certifications

The Company expects its partners to adhere to modern slavery and human trafficking laws and strives to ensure that its partners comply with the Company's own principles. To this end, the Company will communicate its modern slavery and human trafficking policy to employees, customers, suppliers and other third parties through its MiTek Code of Conduct, Supplier Code of Conduct and this Modern Slavery Statement.

The Company will conduct supplier audits and site visits on an as-needed basis in higher risk countries, for suppliers without anti-slavery measures in place and otherwise when appropriate. Suppliers who do not comply with these audits or who fail an audit will be suspended or terminated. On request, the Company's suppliers must certify their adherence to human trafficking and slavery laws in each of the relevant countries in which they operate. Suppliers must be able to provide details of the steps they have taken with their own businesses and supply chains to ensure they are free from slavery and human trafficking.

D. Accountability

In order to maintain internal accountability standards regarding this Modern Slavery Statement, the Company will conduct internal audits and review documents.

The Company takes noncompliance with this Modern Slavery Statement extremely seriously. Upon uncovering a breach of modern slavery and human trafficking laws, the Company will take steps to address the violations and prevent their recurrence.

Employees are obligated to report any suspected noncompliance with this Modern Slavery Statement, and retaliation for reports made in good faith is strictly prohibited.

E. Training

Through review of and training on this Modern Slavery Statement on a regular basis, the Company will equip its employees with the skills and knowledge needed to identify, manage, and remedy any ethical dilemmas they encounter while conducting business.

The Company will provide copies of this Modern Slavery Statement to its strategic sourcing personnel and commodity managers, who will be responsible for supplier onboarding and receive detailed supplier onboarding processes. A copy of this statement will also be posted digitally for all employees.

F. Update

To date, the the Company has not identified or suspected incidences of slavery, servitude, forced or compulsory labor in its suppliers.

The Company operates an ongoing supplier assessment process and will continue to do the same to ensure every effort is made to mitigate against slavery, servitude, forced or compulsory labor in its supply chains.

This Modern Slavery Statement has been approved by the Directors of MiTek Inc., the parent company of the organizations in Australia, the United Kingdom, Canada and California, USA, described above.

Adopted January 2024