



Brad Williams, President

MODERN SLAVERY POLICY

1. POLICY

It is the policy of Cadre Holdings, Inc., on behalf of itself and its subsidiaries, (collectively, the “Company” or “Cadre”), to comply fully with all applicable laws and regulations governing its operations and to conduct business in an ethical and transparent manner. The Company strictly prohibits Modern Slavery in all forms and expects the same from its suppliers and other business partners.

2. DEFINITIONS

Modern Slavery: Exploitative practices such as child slavery, domestic servitude, forced labor or criminality and human trafficking: i.e. to deprive another person’s liberty to exploit for personal or commercial gain.

3. PURPOSE AND SCOPE

The Company is committed to devising, implementing, and enforcing controls to ensure Modern Slavery is not occurring in its supply chain. This Policy shall be used to ensure that the Company’s high standards of business conduct are upheld and that our supply chain acts in a way consistent with these values.

4. APPLICABILITY AND RESPONSIBILITY

- i. This policy applies to all associates, directors, officers, suppliers, contractors, consultants, third-party representatives, and business partners.
- ii. Cadre’s Board of Directors have ultimate responsibility for ensuring this policy complies with legal and ethical obligations primarily through oversight by the Audit Committee.
- iii. The Vice-President, Legal is responsible for implementing this policy, monitoring its use and effectiveness, ensuring that managers and employees receive adequate training, and auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery.
- iv. Prevention, detection and reporting of Modern Slavery in any part of the Company’s business or supply chains is the responsibility of all listed in 4 i above.
- v. Concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains should be raised at the earliest possible stage. The following signs could indicate that a worker may be a slavery or trafficking victim:
 - a) Worker is not in possession of their own passport, identification, travel documents or bank account;
 - b) Worker acts as though they are being instructed or coached by someone else;
 - c) Worker allows others to speak for them when spoken to directly;
 - d) Worker is dropped off and collected from work;
 - e) Worker is withdrawn or they appear frightened;

- f) Worker does not seem to be able to contact friends or family freely; and
- g) Worker has limited social interaction or contact with people outside their immediate environment.

5. REQUIREMENTS

- i. **Annual Anti-Slavery Statement:** Commercial organizations that carry on business in the UK, supply goods and services and have a total annual turnover of £36 million or more, are required to publish within six months of the end of each financial year, an Annual Anti-Slavery Statement in accordance with Section 54 of the *Modern Slavery Act*. The Annual Anti-Slavery Statement is intended to convey expanding and evolving compliance efforts to combat Modern Slavery, i.e. set out the steps (if any) that the organization has taken during the preceding financial year to ensure that modern slavery is not taking place in any of its supply chains and in any part of its own business. The statement must be signed by a Director and published on its website with a clear link on the homepage. This applies to Safariland Ltd UK and Safariland, LLC.
- ii. **Supply Chain Due Diligence:** The Company carries out the following steps to support its Modern Slavery controls where supply chain is concerned:
 - a. Suppliers are required to complete a Corporate Social Responsibility Questionnaire and are encouraged to become members of SEDEX, a global non-profit organization specializing in sourcing data on supply chains and managing performance around business ethics;
 - b. Suppliers are advised that the Company does not tolerate Modern Slavery in any form by publishing this policy and Annual Anti-Slavery Statement on the Company website;
 - c. Denied parties checks are carried out on all companies in the supply chain. If any Modern Slavery concerns are identified for a supplier, an immediate review and business assessment / investigation will be initiated;
 - d. Contracts with high-risk Suppliers contain anti-slavery provisions which prohibit Suppliers and their employees and sub-suppliers from engaging in Modern Slavery;
 - e. Risk assessments of our supply chain to determine high-risk suppliers. In cases of high-risk suppliers, we may audit the Supplier and, as appropriate, we require them to take specific measures to ensure that the risk of modern slavery is significantly reduced; and,
 - f. In the event that Modern Slavery is actually identified in our supply chain, we will take immediate action to address it: i.e. by attempting to resolve the situation with a supplier through discussion, failing which, business with such a supplier would be terminated.
- iii. **Internal Recruitment Due Diligence:** The Company carries out the following steps to support its Modern Slavery controls where internal recruiting is concerned:
 - a. All associates have a written contract of employment and have not paid any direct or indirect fees to obtain work;
 - b. Associates are legally able to work in the country in which they are recruited;
 - c. Names and addresses of associates are cross-references to check for high shared occupancy, (often a factor for those being exploited);
 - d. All new associates are provided with information on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to;
 - e. If, through the recruitment process, HR suspects someone is being exploited, HR will follow the appropriate reporting procedures; and,

- f. Due diligence checks are conducted on any recruitment agency used by the Company to ensure that it is reputable.

6. RESPONSIBILITIES

- a) Supply Chain Management and the Legal & Compliance Department shall be responsible for developing, implementing, maintaining, overseeing, and auditing the protocols and procedures set forth in this Policy.
- b) Each manager, officer, and associate of the Company is individually responsible, by action and supervision as well as continuous review, to ensure strict compliance with this Policy.
- c) The Vice President, Legal is responsible for furnishing advice with respect to the interpretation and application of this Policy.
- d) Each associate has the affirmative obligation to promptly report in good faith any suspected violations of this Policy. Such reports shall be made to the associate's manager, the Ethics Helpline, Vice-President, Legal, or other appropriate reporting channels.
- e) Any confirmed violations of this Policy shall be reported to the Vice-President, Legal.

7. EXCEPTIONS

Any exceptions to, or deviations from, this policy require the prior written approval from the President or Vice-President, Legal.

8. POLICY HISTORY

Version	Date	Description	Originator
1.0	1/31/2022	Initial policy release	T. Barrett-Ryan
2.0	5.15.2024	Cadre Update	T. Barrett-Ryan