



## Forced Labour Report for Bradley Company, LLC

This report (“**Report**”) is made in compliance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) by Bradley Company, LLC, (“**Bradley**”) a Wisconsin limited liability company and, as of October 2023, a subsidiary of Watts Water Technologies Inc. (“**Watts**”).

This report has been prepared for the calendar year ended December 31, 2023.

Bradley’s sole member, as the principal governing body, approved the report on April 16, 2024.

### Who We Are: Vision, Mission, and Values

Bradley is based in Menomonee Falls, Wisconsin, United States, and has been a trusted provider and manufacturer of commercial washroom and emergency safety products serving commercial (primarily institutional) and industrial end markets for over 100 years. Bradley offers a comprehensive product portfolio that includes plumbing fixtures, washroom accessories and emergency safety products to a diverse customer base.

At Bradley, we are committed to continuous improvement and customer satisfaction. As a responsible corporate citizen, manufacturing premium-quality commercial washroom fixtures, we’re committed to responsibly using all resources as well as safeguarding the communities and environments in which we operate.

### Our Supply Chains

Our supply chain is relatively complex. We work with many suppliers to provide goods and services to support the delivery of our business objectives. While we largely use US suppliers, we are supplied by all types of companies, from local businesses through to global companies. We have hundreds of suppliers, both to supply input products used in the manufacturing of our own products for sale, as well as suppliers to support our general operations.

### Risks of Forced Labour or Child Labour in Our Supply Chain

Bradley is committed to the safety and health of its employees and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to provide a safe working environment. Suppliers are expected to remain in material compliance with all health and safety laws applicable to the operation and use of the facilities at which products are manufactured or stored on our behalf. Like with many global businesses, risks in our supply chain arise because of our limited visibility into our own suppliers’ upstream supply chains. To reduce this risk, suppliers are encouraged to establish traceability systems that track raw material lot/batch numbers to the finished product lot/batch numbers including traceability to inspection records.



Although Bradley's exposure to forced labour and child labour risks is considered low, the nature of business requires procuring a large number of supplies and materials from international manufacturers. These products are typically sourced from direct suppliers. Our supply chain includes iron and steel washroom products, plastic safety showers, valves, dispensers and other plastic, artificial stone and stainless steel components of commercial washroom and safety products.

Our current ability to trace the origin of specific products or inputs remains constrained due to our role as a downstream purchaser. Our limited visibility into the full supply chain of upstream suppliers underscores the need for enhanced due diligence and transparency within our supply chains.

## **How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour**

Bradley is committed to supporting responsible sourcing of its materials from suppliers that share our values around human rights and ethics.

### **1. Our Policies and Due Diligence Processes**

Bradley prides itself on being a good corporate citizen to all of its stakeholders. Bradley's Supplier Manual contains a Supplier Code of Conduct, which lays out obligations of its suppliers. The Code of Conduct formalizes Bradley's expectation that our suppliers be good corporate citizens and comply with all applicable laws and regulations, including those governing the manufacture of our products, safety, child labour, employment, labour and the environment. Suppliers are expected to be familiar with the business practices of their sub-suppliers and contractors and, with them, operate within the guidelines of the Supplier Manual. Bradley takes its values and its Code of Conduct seriously. We view it as the foundation and critical element of any supplier relationship.

Our terms and conditions of purchase further require sellers to certify that all goods furnished shall have been produced in compliance with all applicable requirements of Sections 6, 7 and 12 of the Fair Labor Standards Act of 1938, as amended, and of regulations and orders of the Administrator of the Wage and Hour Division issued under Section 14 thereof, and in accordance with all applicable state and federal laws and regulations governing general conditions for labour employed in the production of such goods.

In addition, and further to Bradley being acquired in October 2023, the policies and procedures of Watts also apply to Bradley. This includes the Watts Global Anti-Human Trafficking Policy, the Watts Code of Business Conduct and the Watts Supplier Quality Manual. In addition, Watts has adopted a modern slavery statement in accordance with the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act 2015. As part of that [statement](#), Watts confirms that it requires its suppliers to comply with its various policies and procedures, including that they not engage in or support the use of child labour or forced or involuntary labour.



## **2. Employee Training on Forced Labour and Child Labour**

Bradley publishes relevant policies prominently on its website. Further, Watts, Bradley's parent company, provides Code of Business Conduct training to its employees annually. This training is expected to be rolled out to Bradley employees as its integration continues into Watts.

## **3. How We Monitor Ourselves and Our Suppliers**

Pursuant to the Watts Global Anti-Human Trafficking Policy, we maintain internal accountability standards and procedures to address employees, contractors or suppliers who fail to meet company standards regarding slavery and human trafficking.

Credible information regarding a potential violation of the Global Anti-Human Trafficking Policy and the Human Rights Policy, whether discovered by Bradley, Watts, employees and agents, or suppliers, and their employees and agents, should be promptly reported to the Watts Human Resources Department or Legal Department. Concerns can also be reported confidentially through the Watts Hotline by calling 877-792-8878 or by using the Hotline's website [www.wattswater.ethicspoint.com](http://www.wattswater.ethicspoint.com).

Bradley and Watts prohibit retaliation against anyone who reports a concern in good faith.

## **How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour in our Supply Chains**

As of December 31, 2023, Bradley has not faced situations of forced labour or child labour and has therefore not had to remedy and rectify such situations.

### **Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Kenneth R. Lepage  
Vice President  
April 16, 2024

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I have the authority to bind Bradley Company, LLC