

**Entities Covered by This Joint Report:**

## Corporate Headquarters:

In-Situ, Inc. (Business number: 736684309), USA

## Wholly owned Subsidiaries of In-Situ, Inc.:

ChemScan Inc. (Business number: 888188619), USA

In-Situ Europe Ltd, UK

Partech, UK

Measuring & Control Equipment CO Pty Ltd, Australia

In-Situ Monitoring Asia Pte Ltd, Singapore

**Financial Reporting Year:** January 1, 2023 – December 31, 2023**Reporting Obligations in Other Jurisdictions:**

California Transparency in Supply Chains Act (2010)

UK Modern Slavery Act (2015)

Australia Modern Slavery Act (2018)

**Industry:**

Specializing in the design, manufacture, sale and rental of premium environmental and process water monitoring equipment and solutions. In-Situ is known for innovation, quality, and customer service.

**Structure:**

In-Situ Inc. in addition to being the headquarters, manufacture, sale, rent and service environmental water quality and level products and solutions.

ChemScan Inc. manufacture, sale, and service wastewater equipment and solutions.

Partech manufacture, sale, and service drinking water equipment and solutions.

Measuring & Control Equipment CO Pty Ltd manufacture, sale and service water flow equipment and are service center for products manufactured by In-Situ, Inc. for the Asia Pacific region.

In-Situ Europe Ltd sale, rent and service products manufactured by In-Situ, Inc.

In-Situ Monitoring Asia Pte Ltd sale and service of In-Situ, Inc products.

**Supply Chain Structure:**

Percentage of material purchased by entity by country of manufacturing:

- US locations (In-Situ, Inc. and ChemScan), approximately 84% of inventory is from US based suppliers.



- Partech (UK) approximately 62% of inventory from UK, 23% US and 14% Europe.
- Mace (Australia), approximately 83% purchased from Australian suppliers and 14% US

All entities are under the same forced labor and child labor policy and requirements.

Suppliers base and processes:

In-Situ companies are currently in the process of consolidating the supply base, however new suppliers are added based on need of services. Estimate adding only 2-3 suppliers per site annually.

There is a process for adding new suppliers and are working to standardize the process for all locations.

- Once a supplier is selected, they must complete a self-audit document that has them rate themselves in a number of areas inclusive of management and sourcing practices and include supporting documentation. The returned form is reviewed by the supply chain team. This is followed up with a conference call for clarification and/ an on-site visit of the facility. The supplier's capabilities based on the classification of that supplier. Approval of the supplier is discussed by the supply chain team and based on compliance with Supplier Code of Conduct. If confirmed, the supplier will be then approved in our system provisionally. The supplier must supply sample work to be confirmed as a qualified supplier.
- Link to Supplier Code of Contact as posted on In-Situ's website. [https://in-situ.com/pub/media/support/documents/RBACodeofConduct7.0\\_English.pdf](https://in-situ.com/pub/media/support/documents/RBACodeofConduct7.0_English.pdf)
- Link to In-Situ's Annual Modern Slavery Letter as posted <https://in-situ.com/pub/media/support/documents/statement-on-efforts-to-combat-modern-day-slavery-iss07-pdf.pdf>

Manufacturing is all completed in-house in three (3) geographies (U.S.A., UK and Australia)

It is the supply chain's policy to only source with approved suppliers and the list is maintained as part of our manufacturing system. As we harmonize that operating system for all locations it will become easier to maintain and control that list across facilities. Currently In-Situ shares and promotes the use of "Key Suppliers" across locations to maintain and manage a smaller supply base.

### **Policies and Due Diligence:**

This statement on In-Situ's efforts to combat modern slavery in its operations and supply chains is made and published pursuant to Canada S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023), California Transparency in Supply Chains Act (2010), the UK Modern Slavery Act (2015), and the Australia Modern Slavery Act (2018). This statement identifies the efforts of In-Situ during the Fiscal year ending December 2023; thereafter, it will be modified as appropriate to provide compliance with regulatory and legislative requirements.



In-Situ is committed to protecting and advancing human rights and will not tolerate violations of human rights in our operations and supply chain. In-Situ fully support the Acts and any equivalent anti-slavery or human trafficking legislation in force in the countries in which we operate. In-Situ act ethically and with integrity in all our business dealings and relationships. In-Situ expect the same high standards from our vendors, and partners, and we expect that our affiliates will hold their own vendors and partners to the same high standards.

It is a matter of practice whereby any violation of Company Policies & Regulations results in immediate termination of supplier relationship.

Manage & mitigate risk by utilizing suppliers in North America as feasible. In-Situ's international subsidiaries predominantly have a long history with their suppliers & change is infrequent; processes to ensure conformance with international laws.

In-Situ's current approved supply base includes: U.S.A., Mexico, China, Germany, England, Australia, Switzerland and Croatia.

New suppliers (outside of the United States) include on-site visits & inspection of the manufacturing facility to audit capabilities & compliance with Business Alliance Code of Conduct.

In 2023 Company implemented a new operating system which linked the Supplier Code of Conduct with every purchase order sent to suppliers.

In-Situ maintains an Approved Supplier List for all purchased items sourced for our products. As part of the approval process, suppliers are required to be compliant with the Code of Conduct. As part of our commitment to the environment & social regulations supply base is surveyed every 2 years regarding adherence to environmental compliance, CMRT & forced labor. Most recent survey sent April 2024.

- Creation and implementation of Company Policies:
  - Supplier Code of Conduct- sent with every purchase order as well as posted on our website.
  - Statement on Company's Efforts to Combat Modern Slavery
  - Implemented monitoring processes for existing suppliers to ensure continued policy compliance.
  - Implemented process for new supply chain suppliers.
  - Communications of Code, Statements and Policies to suppliers, customers and internally throughout the Company
  - Company Website Postings
  - Incorporation of Policies into Employee Handbook



- Revision on the Supplier Audit Document, changing forced labor from a data point question to a scorable question the audit.

#### Current Supplier Auditing Process:

- Survey requests are distributed to active existing supply chain suppliers to ensure compliance with regulations (every two years).
- For new suppliers in possibly “high-risk” areas, on site audits are completed prior to establishing them as a supplier.
  - For example, as In-Situ had not worked with a supplier from Croatia previously, an on-site visit and audit of their facilities was conducted to further ensure compliance with proper business practices.

#### Grievance Mechanisms:

- Whistle-blower Policy:

In-Situ is committed to conducting business with honesty and integrity and expects all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible. This policy covers all employees, officers, consultants, contractors, casual workers, and agency workers.

- Grievance, Procedure:

In-Situ considers it important that all employees have access to a procedure to help deal with any grievances relating to their employment fairly and without unreasonable delay. The Company aims to investigate any formal grievance raised, hold a meeting to discuss it, inform complainant in writing of the outcome, and give employee a right of appeal if dissatisfied. The purpose of this procedure is to set out how employees can raise a grievance and how the Company will investigate and deal with grievances.

- Corporate and Social Responsibility Statement coupled with Open Door Policy.

#### Training:

Training related to forced labor and child labor is part of the Company Handbook communication and training process. All employees sign a document acknowledging the receipt and understanding of the content of the Handbook and all policies. Review and acknowledgement are done at time of employment and bi-annually thereafter.

Review of the Policy is done in an All Staff meeting on an annual basis.



## **Additional relevant information as provided in the Employee Handbook:**

### **Corporate and Social Responsibility**

The Company Management Team believes that all those engaging with In-Situ should be treated with an attitude of fairness, honesty, and respect. All employees are encouraged to report concerns and are empowered to step away from negotiations if they feel that they or the business are going to be compromised by the acts of others.

All suspected illegal or dishonest activities must be promptly submitted to human resources who will be responsible for promptly investigation or coordinating corrective action.

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### **Whistleblowing Policy**

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### **What is whistleblowing?**

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. A non-exhaustive list may include:

- criminal activity
- failure to comply with any legal obligation
- miscarriages of justice
- danger to health and safety
- damage to the environment
- bribery
- facilitating tax evasion
- financial fraud or mismanagement
- breach of our internal policies and procedures



- conduct likely to damage the reputation or financial wellbeing of the company
- unauthorized disclosure of confidential information
- negligence
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If an employee has any genuine concerns related to suspected wrongdoing or danger affecting any of company activities (a whistleblowing concern) it should be reported under this policy.

### **How to raise a concern**

In many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the HR Representative. Upon contact, a meeting will be arranged as soon as possible to discuss the concern. You may bring a colleague to any meeting under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

### **Confidentiality**

In-Situ values the staff being able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If an employee wants to raise a concern confidentially, every effort will be made to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

Although anonymous disclosures are not encouraged, every effort will be made to investigate them. You should be aware that proper investigation may be more difficult or impossible if further information from you cannot be obtained. It is also more difficult to establish whether an allegation is credible. Appropriate measures will be taken to preserve confidentiality. If you are in doubt, you may consider seeking advice from Protect, an independent whistleblowing charity, that offers a confidential helpline.

### **Equal Employment Opportunity**

In-Situ is dedicated to the principles of equal employment opportunity. The Company prohibits unlawful discrimination against applicants or employees on the basis of age over 40, race, gender, color, religion, national origin, disability, genetic information, sexual orientation, gender identity, veteran status, pregnancy or having a condition relating to pregnancy or any other applicable status protected by federal, state or local law.

### **ADA, Religious, and Pregnancy Accommodation**

The Company will make reasonable accommodation for qualified individuals with known disabilities unless doing so would result in an undue hardship to the Company or cause a direct threat to health or safety.



The Company will make reasonable accommodations for employees whose work requirements interfere with a religious belief, unless doing so poses undue hardship on the Company. Employees needing such accommodation are instructed to contact their Manager immediately.

The Company will make reasonable accommodation to otherwise qualified employees due to pregnancy, a health condition related to pregnancy, or the physical recovery from childbirth absent undue hardship.

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### **No Retaliation for Reporting Harassment or Discrimination**

In-Situ prohibits retaliation against an employee for filing a complaint under this policy or for assisting in a complaint investigation. If you perceive retaliation for making a complaint or your participation in an investigation, please follow the complaint procedure outlined above. The situation will be investigated. Any person found to have retaliated against an employee for making a harassment or discrimination complaint will be subject to disciplinary action, including possible termination of employment.

### **Whistleblower Protection**

A whistleblower is an employee of In-Situ, Inc. or any subsidiary who reports an activity that he/she considers to be illegal or dishonest to one or more parties specified in this policy. The





whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

A non-exhaustive set of examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; theft of goods; fraudulent reporting of timecard activity; engaging with a related party without receiving the appropriate approvals.

If an employee has knowledge or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the HR Director. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas: confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and/or to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower; this includes but is not limited to, protection from retaliation in the form of an adverse employment actions such as termination, compensation decreases, or poor work assignments and/or threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resource Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

#### Defend Trade Secrets Act (DTSA) Compliance: Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:

Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order."

All reports of illegal dishonest activities will be promptly submitted to the Company President or Director of Human Resources who is responsible for investigating or coordinating corrective





action. Employees with any questions regarding this policy should contact the Director of Human Resources.

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.

John Joseph Pawlikowski  
President and CEO  
May 29, 2024

A handwritten signature in blue ink, appearing to read "John Pawlikowski", written in a cursive style.

I have the authority to bind In-Situ, Inc. and wholly owned subsidiaries.



