

EDGETECH (UK) LIMITED (the "Organisation")

Slavery and Human Trafficking Statement for Financial Year 2017 / 2018

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps the Organisation has taken and plans to take in the future to ensure that slavery and human trafficking is not occurring within our supply chains or in any part of our business.

Respecting Human Rights issues is a key consideration throughout our Organisation and we expect our suppliers to act with integrity throughout their organisations. We have zero tolerance to slavery and human trafficking and expect all those in our supply chain to comply with these values.

Organisational Structure

Edgetech (UK) Limited, a wholly owned subsidiary of Quanex IG Systems, Inc., is a manufacturer and distributor of products within the Fenestration Industry, employing approximately 65 people within the UK operations based in Coventry. This statement is published on behalf of Edgetech (UK) Limited in line with the Modern Slavery Act 2015, and references to "we", "us", "our" or the "Organisation" are to Edgetech (UK) Limited.

Quanex IG Systems' Head Office is based within the USA, with sites across the USA, Europe and UK.

Quanex IG Systems has an annual turnover in excess of \$180m with a workforce of approximately 520 worldwide.

Supply Chain Overview

The Organisation's supply chain encompasses the supply of both raw materials and finished goods, primarily from the USA and Europe with a small amount of goods purchased from China.

The Organisation's primary raw materials include silicon compound, tapes, adhesives, and extruded plastic products.

Policies relating to Human Trafficking and Slavery

We are committed to reducing the risk of modern slavery and human trafficking in our supply chains and related dealings.

This Statement and our corporate policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing systems and controls that are both effective and reasonable in scope given our risk level, in order to ensure slavery and human trafficking is not taking place within our supply chain.

We have instituted an Anti-Bribery Policy, Employee Codes of Conduct and other internal policies concerning ethical behaviours, which highlight our commitment to ensuring we continue to operate in a principled manner, with the aim that our Organisation and supply chain remain free of slavery and human trafficking. We also have extensive Corporate and local systems in place to encourage the reporting of concerns, both by our employees and by third parties, and to ensure the protection of whistle blowers.

Risk Assessment and Due Diligence

In the future, we aim to regularly assess risk related to modern slavery and human trafficking associated with our supply chain and institute supply chain diligence procedures that are reasonable and appropriate in light of our business and risk levels.

During fiscal 2018, we continually assessed our global supply chain risk based upon geography and determined that our supply base is relatively low risk with respect to the potential for slavery and human trafficking. Based on the results of that assessment, in 2019 we plan to continue our focus on compliance and certification efforts on those suppliers located in the highest risk countries, including supplier visits, questionnaires and our critical and strategic supplier review processes.

The Organisation aims to build long standing relationships with all suppliers and make clear our expectations of business behaviour, including our stance with regard to modern slavery and ethical practises, to enable effective working relationships throughout our supply chain. All suppliers are required to regularly complete supplier details form updates, including specific slavery and human trafficking.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our Organisation, in the future we will also explore the potential for providing training to relevant members of staff, including but not limited to Procurement and Management staff across the Organisation.

Monitoring and Reporting

We maintain an Alert Line that allows both employees and third parties to report any violations of law or our codes of conduct. That Alert Line is monitored by our corporate compliance officer, and all reports submitted to the Alert Line are investigated. As we work in 2019 to develop additional procedures specifically related to modern slavery and human trafficking, we will establish and implement appropriate monitoring and reporting structures where necessary.

This Statement was approved by the Board of Edgetech (UK) Limited on March 14, 2019.

Date of Statement: March 14, 2019
Date of Next Review: March 1, 2020