

# **Fighting Against Forced Labour and Child Labour in Supply Chains Act Transparency in Supply Chain Act UK Modern Slavery Act**

2024 Annual Report

The Lee Company

This report addresses the period beginning on January 1, 2024 and ending on December 31, 2024 and has been prepared in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). This report is made on behalf of The Lee Company.

Forced labor and child labor, each as defined in the various Acts, are crimes and serious violations of human rights. The Lee Company recognizes the important role that we have in adhering to the highest ethical standards in our products, as well as the supply chains that support them. This report sets out the steps we have taken during 2024 to address the risk that forced labor or child labor is used in the production of goods in the United States.

## **1. The Lee Company's Structure, Activities and Supply Chains**

### *Activities*

The Lee Company produces miniature hydraulic and pneumatic flow control devices for the aerospace, space industrial, oil & gas, and medical markets. Our standard product lines include pumps, solenoid valves, check valves, pressure relief valves, safety screens, restrictors, and plugs.

### *Structure*

The Lee Company is headquartered in Westbrook, Connecticut. Our primary manufacturing facilities are located in Connecticut. Our subsidiary Lee Ventus Limited is located in the United Kingdom, where it designs and manufactures disc pumps. Our Sales Subsidiaries include:

- Lee Products Limited (United Kingdom)
- Lee Company S.A. (France)
- Lee SRL (Italy)
- Lee Hydraulische Miniaturkomponenten GmbH (Germany)
- The Lee Company Scandinavia AB (Sweden)

### *Supply Chains*

The Lee Company makes many of our own details and handles as many processes as possible in house. We pride ourselves on producing quality products and sourcing materials and services from US companies whenever possible. All final manufacturing of our products is done at our Connecticut facilities, with the exception of disc pumps, which are manufactured by Lee Ventus Limited in the United Kingdom.

## **2. Steps taken to prevent and reduce the risk that forced labor or child Labor is used in the production of goods**

The Lee Company is committed to preventing slavery, servitude, forced or compulsory human labor, child labor, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation in any part of our business or in our supply chain.

Our direct suppliers certify their compliance with laws of the countries that they do business in, which includes slavery and human trafficking restrictions, through their acceptance of the terms and conditions of doing business with The Lee Company.

## **3. Policies and due diligence processes in relation to forced labor and child labor**

Our procurement policies require that all vendors comply with relevant laws and regulations. The Lee Company maintains a Code of Conduct and Ethics. Our Code requires our employees to comply with applicable laws and conduct themselves in compliance with the highest ethical standards. There is annual compliance training at The Lee Company to reinforce this. Our Code of Conduct and Ethics is also provided to direct suppliers, as they are required to adhere to the policy as well.

## **4. The parts of its business and supply chains that carry a risk of forced labor or child labor and the steps taken to assess and manage that risk**

We do not have significant risk of modern slavery within our operations or workforce. We condemn and prohibit human trafficking as well as forced and child labor. Our internal policies and procedures are designed to provide a positive, safe work environment, ensure compliance with applicable law, and respect and protect human rights. As a company that operates in

both aerospace and defense markets, we operate in a highly regulated industry, predominantly employ a highly skilled workforce, and do not operate in any sector or industry that has a prevalence of modern slavery risks.

Because of the nature of the goods we source, where our suppliers are predominantly located, the due diligence we conduct to ensure potential strategic suppliers are qualified, and our standard terms and conditions of purchase requiring suppliers to comply with applicable laws, we do not have a significant risk of modern slavery within our supply chain. However, we recognize that forced labor and related practices have the potential to intersect with our supply chain and have established processes to mitigate that risk.

**5. Any measures taken to remediate any forced labor or child labor**

No incidents of forced or child labor in our supply chain were identified by The Lee Company during 2024. As such, no remediation measures were required.

**6. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced Labor or child Labor in its activities and supply chains**

No incidents of forced or child Labor in our supply chain were identified by The Lee Company during 2024. As such, no remediation measures were required.

**7. The training provided to employees on forced Labor child Labor**

The Lee Company recognizes that our people play an important role in building and maintaining a strong ethical culture where we achieve our business goals with integrity, in accordance with our Code of Conduct and Ethics, and applicable laws. Ethics and compliance training is conducted at The Lee Company annually.

**8. How the entity assesses its effectiveness in ensuring that forced Labor and child Labor are not being used in its business and supply chains**

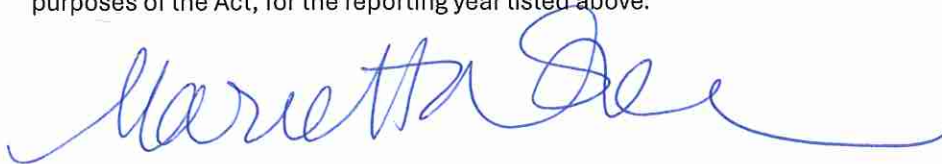
The Lee Company is committed to a culture where people are encouraged and confident to speak up, without fear or retaliation. This is a companywide value. The Lee Company has zero tolerance for retaliation against activities or individuals that impact good-faith reporting, and anyone engaging in retaliatory behavior is subject to disciplinary action.

Questions or concerns raised through the above-described reporting mechanisms will be directed to upper management for a thorough investigation. No such reports or concerns were made, in regards to modern slavery and human trafficking, during the Reporting Period, and we have not otherwise identified any instances of modern slavery or human trafficking in our business or in our supply chain. This is consistent with our assessment that overall, our exposure to human trafficking and modern slavery is low.

The Lee Company is committed to improving our regular business operations to ensure modern slavery and human trafficking is not taking place in our organization or supply chain.

**Approval and 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 this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Marietta Lee  
Chief Executive Officer, The Lee Company  
May 12, 2025

*"I have the authority to bind The Lee Company"*