Anti-Slavery and Human Trafficking Statement

Boyd is a leading industrial technology company offering advanced thermal management and engineered materials solutions for diverse, growing end markets, including the mobile and hyperscale computing, consumer and enterprise electronics, medical, recreational, transportation and mobility and aerospace and defense industries. Boyd is headquartered in Pleasanton, California (United States) and has operations in 35 facilities across 12 countries. Boyd has approximately 6000* employees globally. This statement applies to all persons working for us or on our behalf in any capacity, including partners, employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Modern slavery can take various forms, including human trafficking, slavery, servitude, forced and compulsory labor (together, “modern slavery”). We do not tolerate modern slavery in any form. We are committed to fully complying with all applicable labor and employment laws, rules and regulations. Boyd is dedicated to implementing and enforcing effective systems and controls within our business and supply chain to mitigate the risk of modern slavery across our operations and supply chains.

Boyd (i) strives to ensure all people are treated with respect and dignity, (ii) promotes diversity and equal opportunity, and (iii) fosters an inclusive and ethical culture. We also expect these same commitments to be shared and upheld by our supply chain and business partners.

Boyd has a robust, enterprise-wide compliance program to help ensure that we do business only with parties that share our corporate values for integrity and adhere to transparent and ethical business practices. We also have comprehensive policies and procedures in place, including the Boyd’s Code of Business Conduct; Diversity, Inclusion and Harassment Policy; Human Rights Statement; Safe Workplace Policy; and the Supplier Code of Conduct Policy. These policies require our employees and suppliers to behave in an ethical manner, comply with applicable law, and ensure the highest levels of integrity and accountability in their operations. We require that Boyd personnel are regularly trained on and comply with company policies. Boyd provides many reporting channels for personnel to report any violations or activity inconsistent with Boyd’s policies and compliance procedures, including an anonymous reporting and whistleblower conduit via Boyd’s third-party Integrity Hotline.

In addition, Boyd’s standard supply chain terms and conditions contain provisions requiring full compliance with all applicable laws and regulations, including explicit obligations regarding anti-human trafficking and ensuring that child labor is not used in the performance of their work. Boyd requires all suppliers, subcontractors and agents which support our U.S. Government contracts to (i) adhere to the flow down Federal Acquisition Regulation (FAR) 52.222-50 requirements on Combating Trafficking in Persons, and (ii) where required, provide certifications of FAR compliance with respect to their anti-human trafficking policies and plans. Boyd retains a right to
audit these suppliers and if necessary and any failure to comply with our requirements would constitute a breach and grounds for termination.

We believe in the transparent disclosure of our anti-slavery and human trafficking efforts. As such, we will report consistent with the regulatory and ethical requirements in the regions in which we conduct business, including the United Kingdom’s Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010 (USA).

Ensuring that modern slavery is eradicated from Boyd’s business and supply chain will continue to be a high priority for the company. We will continue to monitor and evaluate the extent of any risk and exposure of modern slavery in our business and supply chain and will regularly assess the effectiveness of Boyd’s programs and policies to prevent such activities.