

POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

erwin is committed to a host of initiatives designed to ensure we act ethically, responsibly and sustainably in all our dealings. Some of those initiatives are outlined below:

erwin is opposed to trafficking in persons and forced labor in any form, and is committed to working to mitigate the risk of trafficking in persons and forced labor in all aspects of our business. erwin strictly forbids its employees from engaging in or supporting in any way trafficking in persons and other forms of forced labor. Not only is erwin policy to combat human trafficking the right thing to do, it is also required by U.S. federal law and aligned with the U.S. federal government's expectations for government contractors. Compliance with this policy is essential for erwin to continue to operate as a U.S. government contractor. erwin employees must immediately report all evidence or allegations of conduct that could be human trafficking or forced labor.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we:

- Provide ethics and Code of Conduct training for all ERWIN personnel annually
- Actively promote ERWIN's Mission
- Are undertaking a training program for ERWIN procurement personnel

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance program. This consists of:

- Risk assessments including an on-boarding process with questions specifically designed to identify:
 - o potential supplier's modern slavery procedures
 - o Right to work of supplier personnel
- Ensuring that business partners adhere to ERWIN's Code of Conduct
- Questionnaires provided on an annual basis for certain categories of suppliers
- Questionnaires provided on a transactional level for any suppliers designated as high risk
- Contractual obligations imposed on suppliers

In addition, we have a dedicated Compliance team, which interacts with every part of the business.

TRAINING & REPORTING

In addition, erwin employees can report their concerns to any of the following resources:

- Any member of the erwin Worldwide Law Department
- Any member of the Human Resources Team

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

ERWIN is utilizing its existing comprehensive supplier due diligence processes and is in the process of tailoring them to target modern slavery and human trafficking.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to continue on our journey to further combat slavery and human trafficking.

S:/ Adam Famularo
Adam Famularo, CEO