



## ITW Human Rights and Modern Slavery Statement

This Statement relates to our fiscal year ended December 31, 2023. It describes the activities of Illinois Tool Works Inc. and its consolidated subsidiaries (the “Company,” “ITW,” “we,” “us” and “our”), to promote respect for human rights, including the elimination of forced labor and human trafficking (collectively referred to herein as “modern slavery”) and child labor from our business and our supply chains, and to promote decent working conditions.

ITW recognizes that our impact extends far beyond our own walls. To further our positive impact on our shared world, we are committed to fostering responsibility across our value chain, through the impact of our products, as well as via our global supplier network.

We have prepared this Statement to comply with the California Transparency in Supply Chains Act, the UK Modern Slavery Act, the Australian Commonwealth Modern Slavery Act, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the Norwegian Transparency Act (collectively, the “Acts”). However, not all entities that are part of the Company are subject to the Acts. To the extent applicable, the signature pages to this Statement include additional disclosures specific to the entities required to prepare a statement under one or more of the Acts.

### ***Our Business and Supply Chain***

The Company, headquartered in Glenview, Illinois, USA and publicly traded on the New York Stock Exchange, is a decentralized global manufacturer of a diversified range of industrial products and equipment employing approximately 45,000 people at 84 divisions in 51 countries.

ITW’s operations are organized and managed based on similar product offerings and end markets and are reported to senior management as the following seven segments: Automotive OEM; Food Equipment; Test & Measurement and Electronics; Welding; Polymers & Fluids; Construction Products; and Specialty Products. The Company owns and operates over 400 plants and facilities which in turn source from thousands of suppliers located in over 100 countries. ITW divisions range from OEMs to Tier 1, 2, 3 and potentially Tier 4 suppliers depending on the market served.

Where practicable, we seek to maintain long-term relationships with local suppliers to help us source responsibly and reduce the risk of sourcing from suppliers that do not meet our standards. In 2023, in our overall supply chain, approximately 85 percent of global spend was with suppliers who are located in an area that aligns with ITW’s strategy to buy materials from suppliers within regions where we manufacture and sell product.

### ***Our Policies and Approach to Human Rights***

The ITW Culture is one of the key drivers of our enterprise strategy and encompasses our Core Values of Integrity, Respect, Trust, Shared Risk and Simplicity. We integrate into our Core Values the principles of the United Nations Global Compact, Universal Declaration of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. Our Core Values, communicated throughout the Company, call for the highest ethical standards in all interactions with all stakeholders.

Our Core Values, [ITW Code of Conduct](#), [Human Rights Policy](#), [Supplier Code of Conduct](#), [Supplier Expectations](#) and [Responsible Sourcing Policy](#), together provide the over-arching compliance framework relating to human rights and decent working conditions, across our entire enterprise.

Our Code of Conduct reflects our commitment to a safe and healthy workplace for our colleagues and business partners. We never tolerate violence, threats or physical intimidation in our facilities. We strive to foster a proactive safety culture with a goal of zero accidents.

We believe that the risks of modern slavery in our own businesses are remote given the nature of our businesses and workforce coupled with our internal policies and procedures and strong Core Values. Where we have identified risks inherent in suppliers, as further discussed below, we have established procedures and work in the spirit of continuous improvement to mitigate the risks of either contributing to or being linked to modern slavery in our supply chains.

### ***Codes of Conduct***

The ITW [Code of Conduct](#) mandates compliance with human rights requirements around the globe, including environmental, health and safety laws that protect the well-being of employees and promote decent working conditions, and laws against slavery, human trafficking and child labor. The ITW Code of Conduct applies to all of our colleagues, directors, businesses and subsidiaries around the world.

In addition, ITW's [Supplier Code of Conduct](#) holds our suppliers accountable to the same standards of conduct set forth in the ITW Code of Conduct. The Supplier Code of Conduct requires our suppliers to treat all workers with dignity and respect, and specifically prohibits our suppliers from employing workers that are younger than 15 or knowingly sourcing from suppliers associated with human trafficking. It further prohibits unlawful discrimination and any form of inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. The Supplier Code of Conduct also requires our suppliers to take reasonable efforts to ensure that their suppliers comply with our policies. We expect our suppliers to comply with the Supplier Code of Conduct, and we do not knowingly do business with suppliers who violate human rights or health and safety laws.

Suppliers are required to establish and maintain a process for ensuring compliance with the ITW Supplier Code of Conduct. This includes communicating the requirements of the code to all employees, affiliates, distributors, subcontractors, agents and other representatives of the supplier who provide products or services to ITW or to ITW's customers on behalf of ITW. Any violation of the Supplier Code of Conduct may result in immediate termination of the supplier's relationship with ITW.

We also have published [Supplier Expectations](#). Among other things, our Supplier Expectations indicate that we expect suppliers to comply with all applicable laws and regulations around the globe, including those pertaining to human rights.

Our [Human Rights Policy](#) indicates that we are committed to human rights in the workplace. Among other things, this includes providing a workplace that protects employee well-being and safety and complies with all applicable laws, including laws against modern slavery and child labor.

### ***Risk Areas in our Operations and Supply Chain***

We believe that the risk of adverse human rights impacts, material violations of working conditions and modern slavery and child labor in our own businesses are low given the nature of our

businesses and workforce coupled with our internal policies and procedures and strong Core Values (as described in this Statement). Information is provided below regarding the risk of adverse human rights impacts that we have identified in our supply chain.

***Unsafe Working Conditions.*** Our Enterprise Safety Strategy and Safety Policy are based on the core principles of: Goal of zero accidents; shared ownership for safety (business and individual); proactive approach focused on accident prevention; continuous improvement philosophy; and compliance with applicable national, regional and local health and safety laws and regulations. From 2019 to 2023, ITW's total recordable incident rate decreased by 28% and our lost time incident rate decreased by 22%.

***Modern Slavery.*** We recognize that modern slavery is a risk in manufacturing supply chains. The expansive nature of our materials supply chain requires us to conduct business with a variety of suppliers, across a variety of jurisdictions, some of which may be considered high-risk for modern slavery. A modern slavery risk in our supply chain is forced labor that could occur without our knowledge in violation of our policies. While we believe that our existing policies and procedures are effective in mitigating this risk at our direct suppliers, forced labor could take place in upper tiers of the supply chain from which we may be several levels removed. Under our Supplier Code of Conduct, suppliers are prohibited from sourcing products or utilizing services from entities associated with modern slavery.

We recognize there are potential risks associated with the production of certain commodities and with the use of temporary labor in our supply chains. In line with UN Guiding Principles 17 and 24, we evaluate our purchased products against the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor for countries and industries prone to modern slavery to help identify high-risk suppliers. ITW also conducts internal research relating to modern slavery risk using other U.S. government and non-governmental organization resources, including review of Withhold Release Orders ("WROs") issued by U.S. Customs and Border Protection. In addition, we host an internal website and training for our businesses which contains pertinent global customs information. ITW also conducts supplier outreach in connection with our conflict minerals country of origin inquiries and participates in industry groups and engagement with other stakeholders.

### ***Steps to Mitigate Risks relating to Human Rights and Working Conditions***

We engage in the activities discussed below to mitigate risks relating to adverse human rights impacts and ensure decent working conditions in our enterprise and in our supply chains. ITW's processes are intended to align with the OECD Guidelines for Multinational Enterprises.

Consistent with our decentralized operating structure, our individual businesses are responsible for assessing and addressing human rights risks, including those related to modern slavery and child labor, in their own businesses and in their supply chains, based on their particular business and risk profile. However, ITW's corporate compliance team administers trainings for our colleagues around the world, as appropriate, including training on identifying and avoiding harassment in the workplace and mitigating modern slavery risk. Additionally, our business units are expected to operate in accordance with our Core Values, the ITW Code of Conduct, the Supplier Code of Conduct, the Supplier Expectations, the Human Rights Policy and other ITW policies and procedures (as described in this Statement).

***Supplier and Risk Assessments; Supply Chain Verification.*** Our businesses evaluate prospective suppliers during supplier selection and periodically thereafter based on financial, legal and sanctions risk. The evaluation may include steps to assess human rights-related risks, such as a supplier questionnaire requesting information about the supplier's manufacturing processes,

quality control, delivery, technology, and other information relative to overall management of the supplier company.

We continue to consider how best to support and enhance our framework and processes to further identify and respond to human rights-related risks in our supply chains and assess the effectiveness of our program.

**Audits.** Prior to placing business with a supplier, an onsite supplier visit may be made by ITW personnel for purposes of confirming supplier overall capabilities related to manufacturing, quality, delivery, and technology, and assessing overall supplier risk. Additionally, after business has commenced with a supplier, onsite supplier visits may be performed periodically by ITW personnel. Although the specific purpose of onsite visits is not typically to assess human rights-related risks, non-compliance with ITW's Supplier Code of Conduct, which sets our expectations for respecting human rights and ensuring decent working conditions, may be identified during the overall supplier assessment. We believe that onsite supplier visits by ITW personnel discourage abusive working conditions and human rights violations. If a violation of human rights were to be identified, ITW would take appropriate steps to remediate the situation.

**Contract Terms.** Our Standard Terms and Conditions of Purchase provide that direct suppliers must comply with all applicable laws relating to modern slavery and child labor and require direct suppliers to comply with our Supplier Code of Conduct.

**Supplier Certifications.** Based on our supplier risk evaluation, we ask suppliers deemed to be high-risk to review and sign our Supplier Code of Conduct. In addition, we require substantial suppliers who sell us product containing tin, tantalum, tungsten and/or gold to certify as to the origin of the minerals to determine whether such minerals or materials may be supporting conflict. In addition, while cobalt and mica are non-regulated minerals, some ITW divisions are collecting and reporting information with respect to these minerals as well. This certification process helps to identify and mitigate the risk of modern slavery, child labor and other violations of human rights.

**Grievance Mechanisms.** All ITW colleagues are encouraged to share any ethics or compliance concerns through multiple channels, including to their local management teams, the Legal Department, Internal Audit or the ITW Confidential Helpline. ITW partners with an external third-party supplier that provides a web- and telephone-based confidential reporting system in 51 countries. Web-based reporting is offered in 16 languages, and telephone-based reporting is offered in more than 200 languages. The ITW Confidential Helpline is also available to suppliers and other external stakeholders. ITW has a no-retaliation policy for good-faith reporting. All reports are investigated promptly and appropriately, and regular updates are provided to the Audit Committee of the Board of Directors.

### ***Internal Accountability and Training***

**Compliance Team.** Employees at our decentralized business units are involved in compliance efforts and are responsible for mitigating risks relating to human rights and working conditions in our enterprise and in our supply chains. At the corporate level, we have a cross-functional Responsible Sourcing Committee headed by ITW's Vice President, Strategic Sourcing and EHSS, who reports to ITW's CFO. The Committee includes Strategic Sourcing, Environmental, Legal, Internal Audit, IT, Trade Compliance, Corporate Communications and other selected personnel who meet regularly to discuss responsible sourcing practices, including those related to modern slavery.

***Training and Knowledge Management.*** Our sourcing personnel are trained in the requirement to act ethically and in accordance with the ITW Code of Conduct. In addition, we require our global sourcing employees, global employees who work with suppliers and customers on conflict minerals requests, and our Responsible Sourcing Committee members to undergo specific modern slavery training. This training is intended to generate awareness of modern slavery among our sourcing professionals and to enable them to address identified issues within our product supply chains. We believe our sourcing professionals who have received training regarding modern slavery indicators are better able to identify and mitigate these risks at their respective suppliers. We host an internal website that contains this training and additional materials on this topic. We also track employees' participation in such training to ensure that our sourcing personnel learn these lessons.

***Employee Certifications.*** Employees are required to annually certify their compliance with the ITW Code of Conduct, which includes a commitment to compliance with human rights-related laws, including those prohibiting modern slavery and child labor.

***Assessing the Effectiveness of Our Actions.*** We utilize information that we receive from audits and grievance mechanisms to understand the performance of ITW's work to respect and promote human rights and decent working conditions.

### ***Additional Corporate Social Responsibility Efforts***

For more information on our efforts and our achievements relating to corporate social responsibility, see our Sustainability Report, which is available at [www.itw.com/sustainability](http://www.itw.com/sustainability).

**Required Approval Under the UK Modern Slavery Act**

ITW Limited is required to prepare a statement pursuant to the UK Modern Slavery Act. Solely for purposes of compliance with the UK Modern Slavery Act, this Statement was approved by the Board of Directors of ITW Limited on June 14, 2024 and signed by a director of that entity as indicated below.



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Giles Hudson, Director  
June 14, 2024

MTS Systems Limited is required to prepare a statement pursuant to the UK Modern Slavery Act. Solely for purposes of compliance with the UK Modern Slavery Act, this Statement was approved by the Board of Directors of MTS Systems Limited on June \_\_, 2024 and signed by a director of that entity as indicated below.

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Sven Castle, Director  
June \_\_, 2024

**Required Approval Under the UK Modern Slavery Act**

ITW Limited is required to prepare a statement pursuant to the UK Modern Slavery Act. Solely for purposes of compliance with the UK Modern Slavery Act, this Statement was approved by the Board of Directors of ITW Limited on June \_\_, 2024 and signed by a director of that entity as indicated below.

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Giles Hudson, Director  
June \_\_, 2024

MTS Systems Limited is required to prepare a statement pursuant to the UK Modern Slavery Act. Solely for purposes of compliance with the UK Modern Slavery Act, this Statement was approved by the Board of Directors of MTS Systems Limited on June 14, 2024 and signed by a director of that entity as indicated below.



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Sven Castle, Director  
June 14, 2024