

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2012 (SB 657)

We have a purchasing policy (the "Policy") which serves as a guide for us to determine our methods and practices in acquiring materials, equipment and services from our suppliers. In implementing the Policy, we select suppliers with the expectation that each supplier will comply with all applicable laws and respect the inalienable rights of all people. Currently, we do not have a formal process to independently audit or verify that each of our suppliers does not engage in human trafficking or slavery, or require our direct suppliers to certify that materials incorporated into products comply with laws concerning slavery and human trafficking. We do, however, include a 'compliance with laws' provision in each of our supplier contracts. Such provision requires a supplier to acknowledge and agree that it is currently complying, and will continue to comply, with all applicable laws, including federal, state and local laws. Our employees and management do receive regular training on and are expected to respect the human rights and dignity of all people, however, we do not currently maintain internal accountability standards or provide training for employees specifically regarding slavery and human trafficking laws.

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