



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

1. We do not engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery.
2. We do not have company standards relating to trafficking and slavery in supply chains, and accordingly we do not conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.
3. We require direct suppliers to certify that they are in compliance with the Lacey Act. As summarized by the U.S. Fish & Wildlife Service, under the Lacey Act it is unlawful to import, export, sell, acquire, or purchase fish, wildlife or plants that are taken, possessed, transported, or sold: 1) in violation of U.S. or Indian law, or 2) in interstate or foreign commerce involving any fish, wildlife, or plants taken, possessed or sold in violation of State or foreign law. Thus, although we do not require direct suppliers to certify that materials incorporated into the product comply with the specific laws regarding slavery and human trafficking of the country or countries in which they are doing business, in certifying that they are in compliance with the Lacey Act our direct suppliers are certifying that they are in compliance with all laws (which would include laws prohibiting slavery and human trafficking) in the countries in which they are sourcing product.
4. We do not have company standards regarding slavery and trafficking, and accordingly do not maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
5. We do not provide company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.