

The California Transparency in Supply Chains Act – Disclosures

It is our policy to ensure that our supply chain reflects our values and respect for human rights. Accordingly, we take the following steps to confront slavery and human trafficking in our direct supply chains:

1. Verifications

We conduct assessments of our product suppliers to verify that they are not at risk for violating anti-slavery and human trafficking laws. We do not use third-party verifiers. Our own materials management team spearheads the verification process using an internally developed assessment. We are currently unable to verify whether our subcontractors use labor brokers.

2. Supplier Audits

Our internal materials management team reserves the right to conduct announced audits of our direct suppliers to evaluate their compliance with our anti-slavery and human trafficking company standards. Audits consist of individual and group interviews with supervisors and management, as well as exhaustive facility tours.

3. Certification

We require our direct suppliers to certify that they comply with anti-slavery and human trafficking laws in the country or countries in which they do business.

4. Accountability

In 2012, we developed internal accountability standards and procedures for employees and contractors failing to meet our company standards regarding slavery and trafficking. If and when our company uncovers employee or contractor compliance problems, we provide written notice and a specified period of time to take corrective action.

5. Training

Employees who are responsible for materials management are trained on the importance of making sure our suppliers are not engaged in violations of the company's policies prohibiting forced labor, slavery and human trafficking. Our company does not provide contractors with training on human trafficking and slavery.