



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE STATEMENT

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires certain companies that manufacture or sell products in the State of California to disclose their efforts to address the issue of slavery and human trafficking in their direct supply chains. The Act was designed to increase the amount of information available to consumers to allow them to make more informed choices regarding the products they buy and the companies they choose to support. At HarbisonWalker International (“HWI”), we are committed to a sustainable business foundation that is built on a culture of compliance with applicable laws and regulations.

Our standards are reflected in our Code of Conduct (the “Code”) which summarizes the ethical conduct and compliance with laws expected of employees and those who work on behalf of HWI. Every year, HWI employees are required to review the Code, participate in training on the Code, and certify their compliance with its standards. To help report instances of illegal, unethical, or improper conduct, HWI maintains an Ethics and Compliance Helpline (the “Helpline”). The Helpline is hosted by an independent third-party provider to accommodate multiple languages and is available 24 hours per day, 7 days per week. It offers an easy, anonymous, and confidential way for employees and third parties to report suspected illegal or unethical conduct. All reports are thoroughly investigated so that all necessary and appropriate action can be taken based on the outcome of each investigation. Any employee or contractor who is found to have violated the Code is subject to disciplinary action, up to and including termination of employment or contracts, and referral to appropriate legal authorities. HWI strictly forbids any form of retaliation against anyone who raises an ethics or compliance concern in good faith.

HWI’s Standard Terms and Conditions for the Purchase of Goods and Services explicitly require that suppliers comply with all applicable laws, orders, rules, regulations, and requirements enforced by any foreign or domestic governmental body or entity relating to the provision of goods and/or services to HWI, which necessarily includes anti-slavery and anti-human trafficking laws. Additionally, we communicate our expectations to suppliers through distribution of our Supplier Quality Manual (“Manual”), which specifically requires suppliers to operate in a manner that is consistent with HWI’s ethical, legal, environmental, and social responsibilities, including all laws that prohibit human trafficking, slavery and forced labor. To the extent our suppliers retain or utilize subcontractors and/or sub-suppliers to perform work or supply goods pursuant to our contracts, the Manual requires our suppliers to use only subcontractors or sub-suppliers that will adhere to these requirements and to monitor such compliance. HWI reserves the right to audit the supplier’s secondary supplier operations. Evidence of illegal activity by the supplier will not be tolerated by HWI and will result in corrective action, including termination of business between the parties.

HWI suppliers must certify that the materials incorporated into the products manufactured for HWI comply with all laws, which would include those pertaining to human rights, anti-slavery and anti-human trafficking. Our personnel, employees, and management with direct responsibility for supply chain management are expected to recognize health and safety best practices and are required to report violations under our Code of Conduct. This disclosure outlines HWI’s standard supply chain procurement practices and contracting best practices.

Version – October 12, 2020