

California Transparency in Supply Chain Act Disclosure Cal. Civ. Code § 1714.43

At Marley Engineered Products LLC, principled business practices are integral to our corporate Values. As a company, we conduct business in a way that respects human rights. We provide equal opportunity in our employment practices and seek to ensure that all persons are treated with fairness and dignity. We are committed to providing a work environment that is healthy, safe and free from all forms of illegal discrimination or harassment, and we seek to comply with all laws regulating the way our products are manufactured. We require that our employees respect the rights, dignity and self-esteem of all persons in any way involved with Marley Engineered Products LLC business and prohibit taking any unfair advantage of anyone through manipulation, concealment, misrepresentation of facts or any other unfair practices. Marley Engineered Products LLC works to meet the needs of a growing global community in a responsible manner.

We evaluate and address direct supply chain risks by requiring suppliers to abide by our contractual terms and conditions, including the condition that they must comply with all applicable laws, which include human trafficking laws. In addition, we maintain a compliance hotline, hosted by a third party, that enables any person to submit concerns regarding human trafficking occurring within our supply chains. All reports to our hotline are investigated thoroughly at the direction of our Compliance Director, with remedial action taken against suppliers if warranted. As a matter of standard practice, we do not utilize third parties to evaluate and verify supply chain human trafficking risks.

We expect our supply chain managers to engage with suppliers and to make assessments of any questionable activity and to ensure that supplier practices conform to our contractual terms and conditions, and to our standards and expectations. We do not conduct audits of suppliers to evaluate, or require suppliers to certify to, compliance with company standards or laws for human trafficking. We do not conduct independent, unannounced audits.

All Marley Engineered Products LLC management and employees are held accountable for failing to meet company standards prohibiting human trafficking in that they must abide by our Code of Business Conduct, our company Values, and all applicable laws. Failure to do so results in disciplinary action up to and including termination of employment. Moreover, we instruct our employees that even conduct that is legal, or not legally restricted, is not permissible if not also ethical. For our employees with direct responsibility for supply chain management, we are implementing training on human trafficking, including with respect to mitigating risks within the supply chains of products.