

## TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

Struktol is committed to the protection and advancement of human rights. Effective January 1, 2012, Struktol makes the following disclosure as to our efforts to eradicate slavery and human trafficking from our direct supply chain:

- **Verification of Supply Chain.** Struktol does not have specific steps in place to verify its product supply chains to evaluate and address risks of human trafficking and forced labor. However, each of Struktol's suppliers is required to comply with all applicable laws.
- **Audit.** Struktol does not specifically audit suppliers for compliance with company standards for human trafficking and slavery. If there is any reason to suspect that a supplier is not complying with human trafficking and slavery standards, then Struktol will address the matter with the supplier.
- **Supplier Certification.** Struktol generally requires suppliers to comply with all applicable laws and regulations.
- **Accountability.** Struktol is committed to ethical and socially responsible conduct in the workplace. Upon hire, Struktol requires all employees to read and acknowledge receipt and understanding of our code of conduct. Our code of conduct includes, among other things, certification that the employee will comply with all applicable laws and regulations. Human trafficking and slavery is a violation of such laws, and would constitute a violation of our code of conduct. Such a violation could result in disciplinary action against the employee, including termination.
- **Training.** Struktol currently does not provide training for members of its supply chain workforce to recognize and mitigate human trafficking and slavery risks in the supply chain. It is looking into implementing a training program for certain of its employees who work in procurement and supply chain management.