



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

Pursuant to California Civil Code § 1714.43

Samuel, Son & Co., Ltd. ("Samuel") is committed to conducting all business lawfully and with integrity. Samuel's commitment to ensuring that our business and supply chain are maintained in a lawful and socially responsible way includes, among other things, an expectation that neither human trafficking nor slavery/forced labor is taking place in any part of our business, and that our suppliers are not using forced labor in any of its forms, including human trafficking and slavery, to produce the products they provide to Samuel.

Supplier Audits

Samuel conducts audits of our key suppliers to evaluate compliance with company standards. The scope of these supplier audits include our company standards for human trafficking and slavery in supply chains, as well as our broader social responsibility and sustainability policies. Suppliers are typically audited based in part on an assessment of the level of risk for coerced labor practices in the country where the supplier operates.

Preliminary supplier risk assessments are generally conducted through supplier self-assessment questionnaires. Our suppliers receive questionnaires, including questions targeted at human trafficking and slavery risk. Samuel uses the questionnaire to help determine risk areas for its suppliers. Using a risk-based approach, announced audits are then scheduled and conducted by internal and external auditors using industry-accepted protocols to ensure that supplier performance is consistent with our policies and expectations. In the event an audit reveals supplier non-conformance with our standards, depending on the circumstances we either require suppliers to establish corrective action plans and report on the implementation of such plans, or we terminate the relationship.

Direct Certification

Samuel's Compliance and Legal department, in conjunction with Samuel's Internal Audit and Enterprise Risk Management department, have instituted a robust Business Partner Compliance Due Diligence (CDD) process to ensure, to the extent possible, that Samuel retains only reputable and honest Business Partners.

As such, following the identification of a potential business partner, but prior to the contract approval, the business unit that wishes to enter a relationship with the business partner will be responsible for completing the steps for the Business Partner Compliance Due Diligence Process. This information will help determine if there are potential conflicts or inconsistencies that would render the potential business partner unsuitable to represent Samuel's interests.



Accountability Standards

Samuel's management sets the tone for our ethical culture and holds managers accountable for communicating ethics and compliance expectations. Samuel's Code of Conduct seeks to promote honest and ethical conduct and support compliance with applicable laws and regulations. The Code of Conduct reflects our policies relating to respect in the workplace, forced labor, human trafficking, wages and work hours, and nondiscrimination.

Non-compliance with Samuel's standards regarding human trafficking and slavery - whether by a supplier or an employee - can result in corrective action or termination depending on the circumstances. Our enterprise risk team (including internal audit, compliance, legal) and our external auditors works with our suppliers and employees to resolve any instances of non-compliance. Samuel employees are trained on and provided with several means to report compliance concerns, including on an anonymous basis, and such concerns are objectively investigated under the guidance and direction of our compliance and legal department. Samuel prohibits retaliation against anyone who, in good faith, raises a concern.

Training on Human Trafficking & Slavery

Samuel requires its employees to comply with our Code of Conduct and employment policies, which prohibition the use of coerced labor. Employees are trained on the specific requirements of these policies. Samuel also provides training to our employees who are directly responsible for procurement and supply chain management on the subject of human trafficking and slavery, particularly with respect to mitigating risks within the supply chain of products. Such employees receive training on company policies and procedures designed to ensure that Samuel's supply chain is free of any type of coerced labor, including guidance on reporting concerns. The training is periodically provided through a variety of means.

Click here to view the complete California Transparency in Supply Chains Act of 2010 (SB 657), or visit the link below:

<https://oag.ca.gov/SB657>