

BALT CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT STATEMENT

I. GENERALLY

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) (the “Law”) went into effect in the State of California. Under the Law, large manufacturers and retailers are required to disclose their efforts to eradicate slavery and human trafficking within their supply chains. The Law’s underlying purpose is to educate consumers, so they can make informed decisions and purchase goods from companies that manage their supply chains responsibly. This Balt California Transparency in Supply Chains Act (this “Statement”) is responsive to the Law.

II. VERIFICATION

Balt SAS as well as its subsidiaries and affiliates (“Balt” or the “Company”) is committed to fair labor practices within our supply chain. Balt engages in regular efforts to identify, assess and manage the risks of human trafficking in the production of our products. When Balt partners with suppliers Balt evaluates human trafficking risks based on a variety of factors, including an in-person visit at their site when possible, the suppliers’ geographical location and manufacturing process, a workforce profile and the history of human trafficking and slavery in the sector. Balt does not use third-party verifiers. Our own supply chain team manages the verification process using an internally developed rubric and assessment. Our team is currently unable to verify whether our subcontractors use labor brokers.

III. AUDITS

Our contracts permit Balt to conduct announced audits of our direct suppliers to evaluate their compliance with our anti-slavery and human trafficking company standards. Audits may consist of individual and group interviews with supervisors and management, as well as facility tours.

IV. CERTIFICATION

To ensure that our contractors and suppliers respect and enforce our company standards, our agreements require the contractors and suppliers to certify that forced labor, slave labor, or any similar form of labor is strictly prohibited; all work is done by choice and workers must be able to end the employment or work relationship at any time, subject to contractual requirements that are agreed to by Workers without any coercion or illegal means; no worker may be subjected to unacceptable treatment such as psychological cruelty, sexual harassment, personal harassment or any other actions prohibited by local law; and suppliers will comply with all applicable laws. Additionally, child labor is prohibited. Suppliers must adhere to international laws and local laws regarding the minimum age for the employment of children, as well as rules and regulations regarding hours and working conditions for children. The minimum age for employment of workers may not be lower than the age at which compulsory school attendance ends, which is no lower than the age of 15. If children are discovered to be working, suppliers are required to take measures to remedy the situation and enable the children to attend school.

V. INTERNAL ACCOUNTABILITY

Balt has 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, Balt provides written notice and a specified period of time to take corrective action.

VI. TRAINING

Balt provides employees with ethics and code of conduct training as well as workplace harassment training, which address aspects of human trafficking and slavery, and are currently establishing training additional training protocols to be implemented.

For further information about this Statement, please contact the Compliance Department at compliance@baltgroup.com.

This Policy is authorized and approved as of October 14, 2022.