

September 26th 2019

Statement on Compliance with California Transparency in Supply Chains Act of 2010

Our compliance with all labor laws – along with our commitment to treating everyone with dignity and respect – includes full compliance with the California Transparency in Supply Chains Act of 2010. This legislation seeks to increase the information made available by manufacturers and retailers regarding their efforts to address slavery and human trafficking throughout their global supply chains.

Guhring, Inc. has a long-standing commitment to operate all of our facilities in compliance with all local, state and federal laws, and to manage our business ethically and with a sense of responsibility and stewardship – including compliance with all applicable wage and hour laws and regulations. Further, we are committed to treating everyone with dignity and respect.

We require that our associates and anyone working on our behalf – including business partners, vendors, service providers, independent contractors and each of their subcontractors – comply with all the laws and regulations in the countries in which they and Guhring, Inc. operate, as well as with our company's procedures and policies.

In particular, Guhring, Inc. requires that everyone in our supply chains adhere to an absolute prohibition on the use of human trafficking, slavery or involuntary labor of any kind, including child labor and indentured labor. Our supply chain partners must comply with all applicable national or local laws concerning age requirements, child labor, working conditions, hours worked and wages earned. Working conditions must comply with all applicable laws regarding safe, healthy and clean worksite conditions.

In many instances, Guhring, Inc. may require its supply chain partners to certify and warranty their compliance with these standards. Employees who believe there may have been a violation of this Code should report it through established channels, and no retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible violations.

We maintain the right to monitor compliance with this policy through the unannounced inspection of facilities by third-party monitors as well as by Guhring, Inc. representatives. We require our supply chain partners to maintain onsite documentation regarding their compliance with this policy and to permit full access to facilities for inspection of worker records. Our supply chain partners must also make workers available for confidential interviews, without fear of retaliation.

Compliance with all provisions of these standards is mandatory for Guhring, Inc. associates and our supply chain partners. We reserve the right to terminate our business relationship with anyone who violates the law, these standards or any applicable company policy.

Guhring, Inc. uses role modeling on a daily basis to train its employees in the standards of ethical behavior, policies, procedures and legal requirements that establish the manner in which it conducts its business. Guhring, Inc does not currently have a formal training process for managers and employees on human trafficking and slavery, particularly with respect to mitigating risks within supply chain.