



## California Transparency in Supply Chains Act of 2010

The California Transparency in Supply Chains Act of 2010 requires retailers and manufacturers doing business in California, including Marvin Engineering Co. and its subsidiaries (MEC), to disclose efforts to eradicate slavery and human trafficking from its direct supply chain to tangible goods offered for sale. The following are the disclosures mandated under the Act for MEC.

### VERIFICATION

MEC will not do business with any company suspected of involvement in any form of forced labor, slavery or human trafficking. Steps are underway to implement a zero-tolerance policy regarding combating trafficking in persons per FAR 52.222-50, as a mandatory purchase order flow down via our Terms and Conditions and in accordance with California Senate Bill 657, Civil Code 1714.43. MEC suppliers will be mandated to verify receipt and require adherence to all relevant laws and regulations at purchase order award and acknowledgement. MEC is also in the process of implementing verification within our approved supplier on-boarding process.



### INTERNAL ACCOUNTABILITY

MEC will incorporate into its existing Ethics Policy anti-slavery and human trafficking initiatives and require its employees to attend yearly ethics training. MEC's ethics policy will make it clear, throughout its organization, that we do not intend to do business with suppliers that are engaged in slavery and/or human trafficking. Employees will periodically be reminded that failure to comply with California Supply Chain Act laws and Marvin policies/guidelines may be grounds for disciplinary action.



### SUPPLIER AUDITS AND CERTIFICATION

MEC conducts audits of suppliers to verify that all legal, regulatory and contractual obligations are being met. MEC reserves the right to use third parties for verification purposes if necessary. If MEC determines that a supplier has failed to meet legal, regulatory or contractual expectations, MEC will require corrective action and cancel all outstanding orders, if satisfactory objective evidence of compliance is not provided.



### TRAINING

All MEC employees will be required to complete training on Combating Trafficking in Persons per FAR 52.222-50 and all elements of The California Transparency in Supply Chains Act of 2010, as well as certify that they will follow these principles as they carry out their day to day responsibilities. Employees with specific job duties related to supplier management may receive additional training on MEC management and audit procedures.

