



California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires manufacturers who do business in California to make certain disclosures on their websites regarding what actions, if any, they are taking to eradicate human trafficking and slavery within their direct supply chains. Signode Industrial Group Holdings US Inc. (“Signode”) fully supports the objectives of the Act and provides the following disclosures:

- Signode engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. Verification is not conducted by a third party.
- In its purchase agreements, Signode often reserves for itself the right to conduct audits of its vendors’ compliance with laws, including the Act. Audits may be conducted by independent parties or by Signode’s personnel and may or may not be unannounced, depending on the terms of the contract.
- Signode’s contracts with its direct suppliers typically require the suppliers to comply with all applicable laws, which include the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Suppliers are not required to provide a certification of compliance.
- Signode’s Code of Business Conduct and Ethics and the more detailed policies that supplement the Code create an internal accountability standard and procedure for employees or contractors failing to meet company standards regarding slavery and trafficking.
- Signode’s employees and management, who have direct responsibility for supply chain management, receive regular training on our Code of Business Conduct and Ethics and the more detailed policies that supplement the Code, which includes the topics of human trafficking and slavery.