

California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 (SB 657) seeks to eliminate slavery and human trafficking from product supply chains. Effective January 1, 2012, SB 657 requires companies doing business in California to disclose their efforts to make sure that their supply chains are free from practices that could be construed as slavery and human trafficking.

Comau LLC has zero-tolerance for both forced labor and child labor, as expressed in the FCA Code of Conduct to which Comau LLC subscribes. We expect our suppliers to recognize and obey laws that require them to treat their workers fairly, with dignity and respect, and to provide a healthy and safe work environment.

Risk-based Supplier Assessments

Comau LLC uses several tools in our assessment of where there may be risk of forced or compulsory labor. We require all suppliers to complete supplier on-boarding diligence materials and to certify that they will comply with FCA's Code of Conduct. Any indication that suppliers do not comply are to be reported to the Comau LLC's legal department for investigation.

Certification

All purchase orders contain language specifically requiring compliance with the FCA's Code of Conduct, which forbids the use of forced, child or compulsory labor. All purchase orders also require compliance with all applicable statutes and regulations.

We do not currently require explicit certification of suppliers that the materials they provide comply with local laws regarding slavery and human trafficking.

Training & Capability Building Programs

All employees must periodically participate in training on the FCA's Code of Conduct, which includes prohibitions on human trafficking, child labor, and slavery in the supply chain.

California Transparency in Supply

Comau LLC is committed to the respect of fundamental human rights and has a zero tolerance policy for human trafficking on slavery in the supply chain.