

CA SB 657

SUPPLY CHAIN DISCLOSURE

This disclosure is made in accordance with the California Transparency in Supply Chains Act of 2010 (SB 657) which requires that manufacturers and retailers doing business in the State of California disclose their efforts to eradicate slavery and human trafficking from their direct supply chain. Independence Sales & Marketing, LLCs' efforts to eradicate slavery and human trafficking from its direct supply chain include the following:

Supply Chain Verification

Independence Sales & Marketing, LLC has a verification process in place to evaluate and address the risks of human trafficking and slavery in its direct supply chain. At the present time we accomplish this verification using internal resources.

Supplier Audits

Independence Sales & Marketing, LLC has implemented a supplier audit program to evaluate the risk of human trafficking and slavery in the company's direct supply chain. At the present time the audits are performed using internal resources. These audits may be announced or unannounced depending on the circumstances.

Direct Suppliers' Certification of Materials

We require our direct suppliers to certify that materials incorporated into the products they sell to us comply with laws regarding slavery and human trafficking of the countries in which they are conducting business.

Internal Accountability Standards

If a supplier or one of our employees is found to violate laws or our company standards, they will be held responsible for improving performance in compliance with a remediation plan. If the supplier or employee fails to make progress against that plan, they will be subject to review and sanctions, including potential termination.

Training

Independence Sales & Marketing's provides training on identifying and mitigating supply chain risks, including human trafficking and forced labor, to its managers and employees with direct responsibility for supply chain management.