

Closure Systems International Inc. (collectively with its U.S. subsidiaries and affiliates, "CSI") is subject to The California Transparency in Supply Chains Act of 2010 (the "Act"). The Act requires CSI to disclose its efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale.

- **Verification.** CSI believes that slavery and human trafficking are wrong, and CSI recognizes the importance of assuring that its major suppliers engage in appropriate behavior. CSI has adopted a Guide to Business Conduct that includes a commitment to adherence to all applicable laws and regulations. CSI conducts internal audits, including review of the activities of its Procurement Group and verification that the Procurement Group adheres to CSI's policies. CSI intends to implement through the Procurement Group annual notifications of CSI's expectations to its major suppliers. CSI does not currently engage a third party to verify and evaluate its product supply chains for risks of human trafficking and slavery.
- **Audit.** CSI does not currently conduct regular audits of suppliers to evaluate supplier compliance with company standards against trafficking and slavery in supply chains. CSI does intend to implement notification procedures to help ensure compliance by major suppliers with CSI's values and purchasing guidelines. While CSI's audits are conducted independently, they generally are announced in advance.
- **Compliance.** CSI does not currently require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
- **Accountability.** Upon hire, CSI requires all office employees to read and acknowledge receipt and understanding of CSI's policies, which are available in CSI's facilities and on CSI's internal SharePoint site. CSI's Guide to Business Conduct requires, among other things, employees to comply with all applicable laws and regulations. Human trafficking and slavery are violations of such laws, and would constitute violations of CSI policy. Such violations could result in disciplinary action against the employee.
- **Training.** CSI trains its employees on its policies, including the Guide to Business Conduct, and ensures that they understand their obligations to comply with all laws, including in all dealings with suppliers.