

Spectrum Control, Inc. – California Transparency in Supply Chain Act

Spectrum Control is opposed to all human trafficking and slavery, regardless of where it is taking place. Spectrum Control generally engages with established reputable businesses in the supply chain and the majority of purchases are from suppliers located in the United States and United Kingdom. Spectrum Control will implement for new acquisitions within a 2 years. The following disclosures are made in reference to California Senate Bill 657, California Transparency in Supply Chain Act of 2010.

To that end, Spectrum Control:

Engage in verification of product supply chains to evaluate and address risk of human trafficking and slavery

Spectrum Control suppliers must comply with supplier flow down requirements. Compliance with all local, state, and federal regulations is flowed down to all suppliers doing business with Spectrum Control.

Conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.

Spectrum Control does not audit suppliers for compliance with standards for human trafficking and slavery. However, if there is any reason to suspect that a supplier is not complying, then Spectrum Control will address the matter with the supplier.

Require direct suppliers to certify that materials incorporated into the product company with the laws regarding slavery and human trafficking of the country or countries in which they are doing business

Spectrum Control requires suppliers to conform to the supplier quality requirements but does not require suppliers to specifically certify that they are compliant in regard to human rights.

Maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking

Spectrum Control employees are required to acknowledge the Spectrum Control corporate employee handbook, which addresses our Code of Ethics. Spectrum Control Code of Ethics does address the compliance with all applicable laws and regulations.

Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products

Spectrum Control does not specifically train on slavery and human trafficking. However, all employees are subject to the Code of Ethics, in which they are required to comply with laws and regulations.