

Notice of Chelton
Pursuant to the California Transparency in Supply Chains Act

Chelton (the “Company”) takes the following measures to comply with the California Transparency in Supply Chains Act of 2010:

1. Certification

The Company expects our business partners throughout the supply chain to be in full compliance with all applicable national laws and regulations, industry minimum standards, and UN Conventions where they are consistent with national law, and/or any other relevant statutory requirements.

We do not tolerate any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labor.

2. Auditing

We require production facilities in high-risk countries to be audited by a third-party auditor to evaluate their social compliance. The Company standard for monitoring includes semi-announced audits, and where appropriate or feasible, unannounced audits may be commissioned.

3. Verification

We expect our business partners to act with due diligence and develop the necessary management systems, policies and processes to a reasonable extent as well as effectively prevent and address any human rights impacts that may be detected in the supply chain.

Assessments may be conducted to verify the information received in supplier discussions and third-party audit reports, including risks of human trafficking and slavery. We evaluate the effectiveness of suppliers' monitoring systems based on the social compliance performance of its production facilities.

4. Procurement Training

Relevant Company employees and managers are trained on company policies and procedures regarding social compliance and mitigating risks within supply chains.

5. Internal Accountability

We hold our employees and contractors accountable. If we find violations to our policies regarding human trafficking and slavery, we will take reasonable and necessary measures within the limits of the law to address the situation in an appropriate manner. We also have a toll-free number, which is managed by a third-party company, for our employees, business partners and suppliers to confidentially report any concerns.