

California Transparency in Supply Chains Act Statement

A. Introduction

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) went into effect in the State of California. Pursuant to the statute, large manufacturers and retailers are required to disclose their efforts to eradicate slavery and human trafficking within their supply chains. The legislative intent of the statute is to educate consumers so they can make informed decisions and purchase goods from companies that responsibly manage their supply chains.

B. Verification

UVertz is committed to fair labor practices within our supply chain. UVertz engages in regular efforts to identify, assess and manage the risks of human trafficking in the production of our products. When UVertz partners with suppliers, we evaluate human trafficking risks based on a variety of factors, including an in-person visit at their site if warranted, the suppliers' geographical location and manufacturing process, a workforce profile and the history of human trafficking and slavery in the sector and region. We do not use third-party verifiers. Our own risk-management team spearheads the verification process using an internally developed rubric and multi-part assessment. Our risk-management team is currently unable to verify whether subcontractors use labor brokers.

C. Audits

Our internal audit team regularly conducts announced audits of our direct suppliers to evaluate their compliance with our anti-slavery and human trafficking company standards. Audits consist of individual and group interviews with supervisors and management, as well as facility tours.

D. Certification

To ensure that our contractors and suppliers respect and enforce our company standards, our agreements require the contractors and suppliers to certify that they will comply with all applicable local, state and federal laws and will not employ children, prison labor, indentured labor, bonded labor or use corporal punishment or other forms of mental and physical coercion as a form of discipline. In the absence of any national or local law, an individual of less than 15 years of age is considered a child. If local laws set the minimum age below 15 years of age, but is in accordance with exceptions under the International Labor Organization Convention 138, the lower age will apply. We also reserve the right to request the contractors and suppliers provide documentation to show compliance with its obligations.

E. Internal Accountability

UVertz has developed internal accountability standards and procedures for employees and contractors failing to meet our company standards regarding slavery and trafficking. If and when our company uncovers employee or contractor compliance problems, we provide written notice and a specified period of time to take corrective action.

F. Training

UVertz provides employees or contractors with training on human trafficking and slavery and is further refining its training protocols to be implemented.

(Last Updated: November 1, 2018)