

Transparency in Supply Chains



HTPG will not tolerate human trafficking or slavery in its operations or its suppliers' operations. HTPG encourages all of its procurement employees to be vigilant regarding human trafficking and slavery in HTPG's supply chain and to report any suspected human trafficking or slavery to the General Counsel. The company will not retaliate against employees who report suspected human trafficking or slavery in the HTPG supply chain.

The following disclosures are made pursuant to the California Transparency in Supply Chains Act of 2010 (Section 1714.43 of the California Civil Code) (referred to in this disclosure as the "Act").

To what extent, if any, does HTPG:

- (1) Engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery?* HTPG does not at this time engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery.
- (2) Conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.* HTPG does not specifically audit suppliers for compliance with company standards for human trafficking and slavery. If there is any reason to suspect that a supplier is not complying with human trafficking and slavery standards, then HTPG will address the matter with the supplier.
- (3) 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.* HTPG generally requires suppliers to be in compliance with all applicable laws and regulations.
- (4) Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.* HTPG employees are required to acknowledge and adhere to its Code of Business Conduct and Ethics (the "Code of Conduct"). While the Code of Conduct does not specifically address human trafficking and slavery, it does require that employees abide by the applicable laws and regulations in each country in which HTPG does business and report any suspected violations.
- (5) 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.* HTPG is working to develop and implement training for members of its supply chain workforce to recognize and mitigate human trafficking and slavery risks in the supply chain.