

## **California Transparency in Supply Chains Act of 2010 (Senate Bill 657) Disclosure**

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (the “Act”) went into effect in the State of California. This law was designed to increase the amount of information made available by manufacturers and retail sellers regarding their efforts (if any) to address the issue of slavery and human trafficking thereby allowing consumers to make more informed choices regarding the products they buy and the companies they choose to support.

Acument Global Technologies, and its affiliated companies Fontana America, Inc., Fontana Fasteners, Inc., and Saturn Fasteners, Inc. (together “AGT”), is the world’s most innovative manufacturer of value-added screws, bolts, nuts and cold formed components; Saturn Fasteners, Inc. is a manufacturer of precision aerospace fasteners including screws, studs, bolts, clevis pins, taper pins, and special externally threaded products manufactured to OEM part numbers. AGT has manufacturing and distribution facilities strategically positioned in countries across the globe. It provides fastening and assembly solutions to customers in countries worldwide. Its brands include Camcar®, Ring Screw, Mapri-Raio, and Saturn® Fasteners.

AGT’s supply chain involves acquiring materials necessary for the operations of its manufacturing facilities. The products are manufactured from various materials including, ferrous and non-ferrous steel, brass, aluminum, titanium, and Inconel®. In AGT’s experience, this type of supply chain is not inherently susceptible to violations of slavery and human trafficking laws. Notwithstanding this limited risk, AGT recognizes and respects all laws designed to protect its and its suppliers’ employees, including, but not limited to, those laws that require it and its suppliers to treat workers fairly, to provide a safe and to protect the quality of the workers’ work environment. AGT is committed to ensuring that its supply chain reflects AGT’s high standards for business ethics, integrity and values, and respect for human rights.

1. **Verification of Supply Chain.** To ensure that its supply chain reflects AGT’s high standards for business ethics, integrity and values, and respect for human rights, AGT relies on suppliers who are expected to comply with all laws, which may include, among others, laws that require them to treat workers fairly and to provide workers with a safe and healthy work environment. AGT’s contracts with its suppliers require them to comply with all laws, which may include, among others, laws that require them to treat workers fairly and to provide workers with a safe and healthy work environment. AGT has the right to terminate these contracts if, for example, the supplier fails to comply with any of these laws. For these reasons and because this type of supply chain is not inherently susceptible to violations of slavery and human trafficking laws, at this time, AGT does not verify its supply chain to evaluate and address risks of human trafficking and slavery.

2. **Auditing of Supply Chain.** AGT relies on members of its supply chain to self-audit, as represented in their own disclosures required under the Act and/or their own codes of conduct. AGT’s contracts with its suppliers require them to comply with all laws, which may include, among others, laws that require them to treat workers fairly and to provide workers with a safe and healthy work environment. AGT has the right to terminate these contracts if, for example, the supplier fails to comply with any law governing its business operations, including but not limited to, laws that require them to treat workers fairly, and to provide workers with a safe and healthy work environment. For these reasons and because this type of supply chain is not inherently susceptible to violations of slavery and human trafficking laws,

at this time, AGT does not audit its suppliers to evaluate compliance with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

3. **Certification by Supply Chain.** AGT contracts with its suppliers require that they comply with all laws, which may include, among others, laws pertaining to human rights, anti-slavery and anti-human trafficking; at this time, it does not separately require them to certify compliance with these laws. AGT, however, has the right to terminate these contracts if, for example, the supplier fails to comply with any law governing its business operations, including but not limited to, laws that require them to treat workers fairly, and to provide workers with a safe and healthy work environment.

4. **Internal Accountability.** AGT is committed to ensuring its suppliers engage in responsible and ethical business practices, and reserves the right to exercise its contractual rights against any supplier found to be in violation of applicable laws, including terminating its contracts with members of its supply chain without cause.

AGT also maintains accountability procedures for and demands commitment to its standards for business ethics, integrity and values by each of its employees and relies on its robust Code of Conduct to set forth expectations for every employee. Annually, each and every employee reviews AGT's Code of Conduct, and each is required to certify that they adhere to the Code of Conduct. Any employee who violates the spirit or letter of the AGT's Code of Conduct is subject to disciplinary action up to and including termination of his/her employment.

5. **Training.** Annually, employees are required to review the AGT's Code of Conduct and required to certify that they adhere to the Code of Conduct. AGT's Code of Conduct includes information on health, safety, and labor and employment best practices, and employees are expected to report deviations from AGT's Code of Conduct. This includes reporting suspicious activity, including, but not limited to, the treatment of workers and the quality of the worker's work environment. AGT takes seriously all potential legal and Code of Conduct violations, and encourages all persons subject to its Code of Conduct to preserve AGT's standards for business ethics and integrity by reporting suspected Code of Conduct violations and submitting comments, complaints and concerns regarding safety, human resources, and ethics to their employer, supervisors and/or human resources representative. AGT also provides its employees with an ethics helpline (877-241-1810) that is available to employees at all times.