



CALIFORNIA TRANSPARENCY IN SUPPLY CHAIN ACT DISCLOSURE

Rockler Companies, Inc. and its affiliates, divisions, and subsidiaries (collectively, “Rockler”) strive to conduct business in a socially responsible manner and enhance our collective commitment to human rights and safety in the workplace. The California Transparency in Supply Chains Act of 2010 is designed to increase the amount of information made available by manufacturers and retailers regarding their efforts (if any) to address the issue of slavery and human trafficking, thereby allowing consumers to make better, more informed choices regarding the products they buy and the companies they choose to support.

SUPPLY CHAIN VERIFICATION. Rockler works with vendors, suppliers, and their respective employees, agents, and subcontractors (collectively, “Vendors”) that comply with applicable federal, state, and local laws and regulations and international standards in the manufacturing and distribution of products or services provided to Rockler. Rockler’s Vendor Agreement documents and Code of Conduct set forth the specific contractual obligations of its Vendors. Those contractual obligations require compliance with all international, federal, state, and local laws, including those laws regarding labor and employment matters and prohibiting Vendor’s from using underage or forced labor or engaging in human trafficking. Rockler retains the right to assess or audit whether any of its Vendors use child or forced labor or engage in human trafficking or whether certain products or geographical locations traditionally use child or forced labor. Rockler retains the right perform factory inspections, audits, or assessments (collectively, “Audits”).

SUPPLIER AUDITS. Currently, Rockler does not have a self- or third-party plan for auditing Vendors to evaluate their compliance with social responsibility goals, including those directly related to human trafficking and slavery. However, Rockler, under its Vendor Code of Conduct, affords Rockler the right to audit any Vendor for compliance.

SUPPLIER CERTIFICATIONS. To ensure that Rockler’s Vendors respect and enforce Rockler’s standards, Rockler’s contract and Code of Conduct documents require Vendors to abide by our antislavery and human-trafficking standards. By doing business with Rockler, Vendors certify that (1) they comply with all applicable laws and regulations regarding the eradication of forced labor, human trafficking, and slavery; (2) their supply chains and materials comply with national and international laws that prohibit human trafficking and slavery; and (3) they agree to conduct business in compliance with all applicable labor laws. Each Vendor must maintain records that are sufficiently detailed to substantiate that materials supplied to Rockler are produced in compliance with the human-trafficking and antislavery laws of the countries where they are produced. These records must be produced to Rockler upon request. Rockler may work with non-compliant Vendors and other stakeholders on remediation efforts or terminate the agreement.

INTERNAL ACCOUNTABILITY. Reporting violations of company policy or legal requirements may be made via fax (763-478-8393), Attn: Compliance, or via e-mail at rocklercompliance@rockler.com. Each report will be investigated by our corporate compliance team. In addition, Rockler’s Employee Handbook has provisions for employee accountability regarding compliance with applicable laws and regulations and reporting of violations. Noncompliance with Rockler’s standards regarding slavery and human trafficking can result in corrective action or termination, depending on the number and severity of the instances of noncompliance found. Rockler reserves the right to terminate a business relationship with an employee or Vendor if deemed necessary.

TRAINING. Rockler currently does not provide its employees with specific, formal training on human trafficking and slavery. Rockler reserves the rights to have its employees with direct responsibility for supply chain management complete training on supply chain risks related to forced labor and human trafficking.