



## California Transparency in Supply Chains Act Disclosure

CPI believes in the ethical treatment of all human beings, and is strongly opposed to human trafficking, forced servitude, child labor and all other types of slavery.

### **Verification of Risk in Product Supply Chains:**

CPI verifies the integrity of its product supply chains through a number of methods, including on-site inspections and audits, supplier evaluations, monitoring of government lists for debarred and denied parties, etc. These activities are carried out by CPI employees, not third parties. The company does not specifically address the issue of human trafficking and slavery in these verifications.

### **Auditing of Suppliers for Compliance with Company Standards:**

CPI conducts periodic audits of its suppliers to evaluate their performance against a number of criteria, including company standards. The company does not conduct audits specifically to address the issue of human trafficking and slavery in its supply chains.

### **Certification by Suppliers that Materials Comply with Slavery and Trafficking Laws:**

Under CPI's Terms and Conditions of Purchase, suppliers are required to comply with their federal and local laws, regulations and government orders, as well as with the federal and local laws, regulations and government orders of the United States or Canada. In addition, CPI requires suppliers who are furnishing materials or products for use in connection with U.S. Government contracts or subcontracts to comply with applicable Federal Acquisition Regulation (FAR) provisions. These FARs include provisions aimed at combating human trafficking. However, CPI does not separately require suppliers to certify that materials incorporated into their products comply with the laws regarding human trafficking and slavery.

### **Internal Accountability Standards and Procedures:**

Although the company has no specific policies regarding human trafficking and slavery, CPI's founding tenet and continuing policy is to comply fully with all laws governing its operations and to honor the highest legal and ethical standards in the conduct of its business. The company's Code of Legal and Ethical Conduct requires not only that all CPI personnel observe the law, but also that they conduct CPI's business in a manner that identifies the company as an ethical and law-abiding enterprise, alert to all the responsibilities of good corporate citizenship. The spirit of the company's Code of Legal and Ethical Conduct requires company personnel to maintain the highest degree of integrity with suppliers, governments and others. There are internal policies and procedures to address this requirement, and negative consequences and penalties for failing to do so.

### **Management and Employee Training:**

CPI provides company employees and management with regular training on their responsibilities and the company's Code of Legal and Ethical Conduct. Individuals with direct responsibility for supply chain management receive additional training on their job responsibilities. CPI does not provide training specifically on the issues of human trafficking and slavery and mitigating the risks of these issues within product supply chains.

### **Reporting Concerns or Complaints:**

CPI encourages anyone who observes conduct that is not in compliance with its Code of Legal and Ethical Conduct or that otherwise violates its company policies to report concerns or complaints by calling Open Line, an independent third-party service for reporting matters of concern, at +1 (800) 876-0912. Callers may remain anonymous, and reports from Open Line are forwarded to company management.