



DISCLOSURE UNDER THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

Under the California Transparency in Supply Chains Act of 2010 (SB 657) (“the “Act”), manufacturers and retailers doing business in California are required to disclose their efforts to eradicate slavery and human trafficking within their direct supply chains. This disclosure statement includes information on our initiatives to understand our supply chain in relation to human trafficking and slavery. However, our compliance with the Act and our attempts to monitor our supply chain do not constitute a guarantee there are no issues in our supply chain despite our efforts to uncover, rectify, and eradicate them.

The United States of America is (1) home to most Trojan Battery’s direct suppliers (2) the origin of most our products and (3) the source of the raw materials we use. The USA has strict laws prohibiting forced labor, slavery, child labor and human trafficking. As such, the risk of such crimes in our supply chains is lower. However, we understand that there may be exceptions.

Trojan Battery Company, LLC (“Trojan Battery”) is committed to ensuring that no form of forced or compulsory labor or trafficking of persons exists within our supply chain. As a manufacturer of specialty materials and solutions, Trojan Battery suppliers are critical to our growth. As such, Trojan Battery develops relationships with carefully selected suppliers who are committed to responsible business practices. Trojan Battery does not tolerate child labor, forced labor nor involuntary labor, including bonded, indentured, and involuntary prison labor, and will not work with suppliers that do not adhere to these requirements. At Trojan Battery, we hold ourselves and our suppliers accountable to high ethical standards wherever we do business.

Trojan Battery Business Partner Code of Conduct

Trojan Battery requests its direct suppliers of critical components to agree to the Trojan Battery Business Partner Code of Conduct (the “Code”), certifying that they comply with relevant laws relating to fair compensation, working hours, child labor, forced labor, and other regulations designed to support human rights. The guidelines outlined in our Code apply to all our direct suppliers of critical components and clearly communicate their responsibilities for conducting business and managing their workforce. A copy of our Business Partner Code of Conduct is available [here](#).

Furthermore, our standard supply contracts and terms and conditions of doing business require all Trojan Battery suppliers to fully comply with all applicable laws, which include laws regarding the prohibition of slavery and human trafficking. Trojan Battery will not do business with a supplier that fails to warrant compliance with all applicable laws and will cease doing business with any supplier or production facility that fails to live up to those promises. Trojan Battery reserves the right to verify that its suppliers are in constant compliance with its terms and conditions, and to terminate relationships with any suppliers who do not comply.

Supply Chain Assessment

Trojan Battery endeavors to conduct assessments of all direct suppliers of critical components to verify that they are not at risk for violating anti-slavery and human trafficking laws and to evaluate their compliance with our responsible sourcing expectations. Trojan Battery aims to conduct *announced* audits and interviews of 100% of its direct suppliers of critical components every three years, which may include facility visits.

Trojan Battery does not use third-party verifiers. We verify suppliers and compliance through our own internal resources.

The does not use labor brokers and subcontractors, as this can present a human trafficking risk. However, Trojan Battery currently does not verify whether our subcontractors use labor brokers.

Education and Training

All Trojan Battery employees are required to acknowledge and adhere to our policies on business conduct, located within our Code of Business Conduct and Ethics, and complete associated annual training. Additionally, the Trojan Battery Supply Chain Team is required to become familiar with our policy on Social Responsibility and complete training regarding human trafficking and anti-slavery. Trojan Battery makes its policies on business conduct available to all our customers and suppliers, upon request.

Trojan Battery has a zero-tolerance policy regarding any suppliers' use of forced labor. If an instance of non-compliance with our standards regarding forced labor, slavery and / or human trafficking is found in our supply chain, with an employee or contractor, the individual or company would be subject to corrective action which could include immediate termination of the relationship.

Reporting Violations

Trojan Battery makes a Compliance Hotline available to all its employees and suppliers. The purpose of this Hotline is to provide a vehicle for anonymously reporting concerns dealing with potentially unfair, unlawful, or unethical business practices and to maintain a system through which Trojan Battery can investigate claims and address complaints. When received, allegations are investigated by our Compliance Team and, at the conclusion of an investigation, Trojan Battery takes appropriate action considering the findings, consistent with Company standards. Such actions may include remediation up to, and potentially including the discontinuation of the business relationship with an employee and / or supplier.

If you have any concerns or information regarding the use of forced labor, slavery and / or human trafficking in Trojan Battery's supply chain or factories, you can anonymously report such concerns or information through the following means:

Website: report.syntrio.com/cdtechno

Toll-Free Telephone:

- English speaking USA and Canada: 844-990-0004
- Spanish speaking USA and Canada: 800-216-1288

- French speaking Canada: 855-725-0002
- Spanish speaking Mexico: 800-681-5340
- All other countries: 800-603-2869
(must dial country access code first. [Click here](#) for access codes and dialing instructions)

E-mail: reports@syntrio.com (must include company name with report)