



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. At Trojan Battery, we hold ourselves and our vendors accountable to high ethical standards wherever we do business. Trojan Battery works diligently to ensure our products are produced ethically by our suppliers and in accordance with our Business Partner Code of Conduct, which our suppliers are subject to as a condition of doing business with Trojan Battery. Our guidelines apply to all of our supply chains and clearly communicate our suppliers’ responsibilities for conducting business and managing their workforces.

UNITED NATIONS BLUE HEART CAMPAIGN

The Blue Heart Campaign is a global awareness initiative to fight human trafficking and its impact on society. It seeks to encourage involvement from governments, civil society and the corporate sector to help prevent crimes involving human trafficking and promote action against it. Trojan Battery proudly dons the Blue Heart in an effort to raise awareness of forced labor, including human trafficking and slavery, and their devastating effects.



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) (“the Act”) went into effect in the State of California. Under this law, manufacturers and retailers doing business in California are required to disclose their efforts to eradicate slavery and human trafficking within their direct supply chains. The law’s underlying purpose is to educate consumers, so they can make informed decisions and purchase goods from companies that responsibly manage their supply chains. Trojan Battery supports the goals of this Act. 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 does not constitute a guarantee there are no issues in our supply chain despite our efforts to uncover, rectify and eradicate them.

VERIFICATION OF PRODUCT SUPPLY CHAINS

What is required? That we engage in verification of product supply chains to evaluate and address risks of forced labor, slavery and human trafficking and disclose if this verification was conducted by a third-party.

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.

Trojan Battery strives to conduct assessments of all its critical component product direct suppliers to verify that they are not at risk for violating anti-slavery and human trafficking laws. We do not use third-party verifiers. We expect our own Materials Management Team to spearhead the verification process with in-person interviews of our critical component product direct suppliers at the management level.

The use of labor brokers and subcontractors can present a human trafficking risk, as they are not commonly monitored by Trojan Battery. Trojan Battery currently does not verify whether our subcontractors use labor brokers.

SUPPLIER AUDITS

What is required? That we conduct audits of suppliers to evaluate supplier compliance with our Company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.

Trojan Battery endeavors to conduct *announced* audits and interviews of 100% of our critical component product direct suppliers every three-years, in part, to evaluate their compliance with our responsible sourcing expectations. Audits are intended to include individual interviews with suppliers as well as facility visits.



CERTIFICATION OF COMPLIANCE WITH LAWS

What is required? That we certify that materials incorporated into our products comply with slavery and human trafficking laws in the country or countries in which they do business.

The United States of America is (1) home to the majority of Trojan Battery's direct suppliers (2) the origin of most of our products and (3) the source of essentially all 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 lowered. However, we understand that there may be exceptions.

We request our direct suppliers of critical components to agree to our Business Partner Code of Conduct (the "Code"), certifying that they comply with fair labor practices and all applicable labor laws and regulations in their countries of operation. Trojan Battery expressly prohibits suppliers from utilizing any forced labor and mandates that workers receive wages and benefits in compliance with all applicable laws. We strive to make this Code a part of every supplier agreement and purchase order that Trojan Battery issues. 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. A copy of our Business Partner Code of Conduct is available [here](#).

ACCOUNTABILITY

What is required? That we maintain internal accountability standards and procedures for employees or contractors who fail to meet our Company standards regarding slavery and trafficking.

Trojan Battery's supply chain team has been asked to become familiar with our standards regarding slavery and human trafficking. Our Company 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 were 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.

Trojan Battery also makes a Compliance Hotline available to all Trojan Battery 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. The system has been an effective mechanism for identifying and remediating issues raised. When received, allegations are investigated by our Compliance Team and, at the conclusion of an investigation, Trojan Battery takes appropriate actions in light of the findings, consistent with Trojan Battery's 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: www.lighthouse-services.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: 01-800-681-5340
- All other countries: 1-800-603-2869 (must dial country access code first. [Click here](#) for access codes and dialing instructions)

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

Fax: (215) 689-3885 (must include company name with report)

TEAM MEMBER AND SUPPLIER TRAINING

What is required? That we provide our Company employees and management responsible for supply chain management, training on forced labor, slavery and human trafficking, particularly with respect to mitigating risks within the supply chain of products.

At the present time, Trojan Battery is preparing a training program for employees and management on forced labor, slavery and human trafficking, with an anticipated roll out date in the near future.