

California Supply Chain Transparency Act

APC Automotive Technologies, and all of our entities, strive to conduct our business in an ethical and responsible manner. Our organization is committed to preserving safety and human rights in the workplace. We expect all of our suppliers to honor that same commitment and will abide by any and all applicable local and international laws.

The California Supply Chain Transparency Act intends to inform individuals on manufacturers' and retailers' efforts to address human trafficking and slavery in the supply chain. APC is comprised of multiple business units, and the below describes policies and procedures across all entities.

Audit

APC and its affiliates will investigate all credible reports of human trafficking and slavery in our supply chain. APC does not have an APC-wide supplier audit program, but specific business units currently use both internal and third party firms to audit suppliers for quality, global security risks and workplace conditions. Supplier audits are determined based upon business unit policy, supplier risk and supplier size. Not all APC-wide suppliers receive a formal internal or third party audit.

Certification

While many of our supplier contracts require compliance with local and international laws and standards including those related to human trafficking and slavery, APC does not maintain a company-wide certification program for all suppliers in all business units.

Accountability

APC will investigate any credible report regarding human trafficking and slavery. Any non-compliance related to human trafficking or slavery, whether by an employee, affiliate or supplier, will result in corrective action up to and including termination of the relationship.

Training

We expect APC business units to inform all supply chain employees with regard to our policies related to human trafficking and slavery. All employees sign a code of conduct policy requiring compliance with all applicable laws including those related to human trafficking and slavery. A formal, documented training policy is not in place in all business units.

Verification

Other than the information provided above, APC does not have a separate verification process for evaluating human trafficking and slavery in the supply chain.