



California Transparency in Supply Chains Act of 2010

On January 1, 2012, the "California Transparency in Supply Chains Act of 2010" law went into effect. This legislation requires retail companies that do business in the state of California to disclose their efforts to ensure that their supply chains are in compliance with slavery and human trafficking laws.

In response to this law, and in efforts to eliminate slavery and human trafficking from supply chains, ICL-IP America Inc. ("ICL") acknowledges the following:

- ICL does not employ slaves or trafficked persons.
- ICL has taken steps to ensure that direct contractors do not employ slaves or trafficked persons. ICL verifies with its direct supply chain suppliers that they are not violating any laws regarding slavery and human trafficking.
- ICL's direct supply chain suppliers certify that materials incorporated in ICL's products comply with all local and federal laws regarding slavery and human trafficking in the country or countries in which the direct supply chain suppliers are doing business.
- ICL is considering conducting audits of its direct supply chain suppliers to ensure compliance with slavery and human trafficking laws.
- ICL is evaluating whether supplemental training and/or changes in accountability standards and procedures for employees and/or contractors are appropriate.