

Title: California Transparency in Supply Chains Act

Number: FOCSUPDEV-0009

The California Transparency in Supply Chains Act 2015

1) Verification

Cascade Engineering Family of Companies promotes ethical business practices and requests and tracks suppliers who have taken the AIAG corporate responsibility training; however, CE FoC does not verify compliance.

2) Audit

Cascade Engineering Family of Companies tracks ISO and TS certified suppliers who are third party audited by an accredited body. We do not audit supplier compliance to company standards for trafficking and slavery. Audits by ISO and TS auditors are independent and planned, not unannounced.

3) Certification

Cascade Engineering Family of Companies requires all suppliers to abide by laws as dictated in our terms and conditions but we do not require certification. We require all suppliers to complete AIAG corporate responsibility training in addition to conflict materials reporting.

4) Internal Accountability

Cascade Engineering Family of Companies' Terms and Conditions require the Seller to strictly comply with all applicable United States federal, state, and local laws, as well as foreign laws. CE FoC supports efforts to end human rights abuses wherever they may occur, and acts in accordance with our vision of respecting global communities. We conduct business in a manner intended to avoid intentionally or knowingly contributing to such abuses. At CE FoC we strive to uphold one consistent standard of ethical conduct on a global basis, while respecting the culture and business practices of every country and community we touch. In the global business environment in which we operate, our long-term success is dependent on each of us executing business decisions with the highest ethical standards. CE FoC maintains an ethics procedure to provide employees an avenue to report suspected violations involving employees or external parties. All reports are investigated.

5) Training

Cascade Engineering Family of Companies requires all purchasing personnel who have sourcing responsibilities complete the AIAG corporate responsibility training. Purchasing employees are required to understand all CE FoC process and procedures including the terms and conditions under which CE FoC conducts business. Included in those procedures is the CE FoC Business Conduct Policy that all employees must understand and abide by.

Rev #: 1 Rev Date: 2/21/2018