



## CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

SONGWON is a global company that does business in California. It seeks to comply with applicable laws and regulations of the different countries it operates in.

SONGWON publicly pledges, consistent with its [Code of Conduct](#), to protect the dignity and values of all stakeholders and has strengthened its human rights compliance systems to create a safe and healthy organizational culture for its employees. Through its commitment to supporting the United Nations' Sustainable Development Goals and similar global and country specific initiatives, SONGWON strives to operate in a way that is responsible toward society and the environment.

SONGWON has identified no human trafficking or slavery in its operations but recognizes this important global challenge and applies a variety of internal policies, procedures and due diligence tools.

SONGWON' manages its supply chain by:

1. using third-party as well as internal **verification** to review the supply chain for risks of human rights abuses, including human trafficking, slavery, and any potential forced labor.
2. conducting periodic **audits** and announced on-site visits of suppliers by SONGWON personnel for a variety of compliance and quality assurance reasons, including any indications of trafficking, slavery, and forced labor in supply chains, a practice that the company is seeking to apply more broadly and enhance.
3. maintaining **accountability standards**, including SONGWON's Code of Conduct, which requires that employees meet company standards regarding human rights in connection with trade control measures. Additionally, SONGWON seeks to comply with the UK Modern Slavery Act 2015 and implements several best practices recommended by the Responsible Mineral Initiative (RMI) to find qualified global distributors. The company continuously strives to improve procedures and accountability standards for employees or contractors to meet our company standards regarding slavery and human trafficking specifically.
4. requiring certain suppliers to **certify** that they follow all applicable laws and regulations. This effort by SONGWON includes questionnaires to assess whether suppliers monitor, manage, and mitigate risks of slavery and human trafficking in their own supply chain.
5. conducting regular ethics **training** for all employees with the aim of meeting SONGWON's Code of Conduct. SONGWON is in the process of expanding training to meet evolving SONGWON policies and to include additional procurement-specific modules on human trafficking, slavery, and forced labor with an emphasis on how to mitigate such risks within SONGWON's value chain.

SONGWON 's efforts toward optimization will be ongoing, and the company is happy to communicate on ethical sourcing. If you have any questions, please contact your SONGWON business representative.