



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

The California Transparency in Supply Chains Act requires certain companies to report the activities they engage in to monitor their supply chains to prevent human trafficking and slavery.

BDA engages in supply-chain verification through a variety of means that may include factory evaluations, in-line and end-of-line inspections (announced and unannounced) and full-time staffing of employees on some production runs. Evaluations may be conducted by BDA, by our clients, or by third-parties. All BDA suppliers are required to have an “open-door” policy, allowing BDA representatives inside to inspect their operations at any time, regardless if the visit is announced or unannounced. Non-compliance results in termination of the partnership.

BDA has an extensive factory evaluation process that addresses slavery/forced labor. We have recently updated our evaluation process to include provisions that address human trafficking as well. In our factory evaluation process, if any signs of forced or prison labor and/or human trafficking are discovered, this is an automatic failure and BDA will not use the source for production. Supplier audits may be conducted by BDA employees, by our clients, or by third-parties.

Vendor partners are required to sign a BDA Manufacturing Code of Conduct Agreement on an annual basis. This agreement encourages a commitment to responsible manufacturing and states that manufacturers will request their contractors and suppliers follow the same practices BDA requires of them. One such requirement, as indicated above, is to halt business with any company showing signs of forced labor or human trafficking.

BDA expects all of our employees to conduct business with uncompromising integrity and professionalism. BDA expects and requires all suppliers and other parties with whom we conduct business to act at all times in a professional and ethical manner in carrying out their services and contractual obligations to BDA, or on BDA's behalf to a BDA customer or other third party. To that end, all BDA partners shall comply with all country, federal, state and local laws, including those against slavery and human trafficking. If any source or potential source shows evidence of forced labor or human trafficking, BDA will alert the proper authorities of such suspicion.

Company employees and management who are directly responsible for supply chain management are required to take a variety of external seminars, webinars and trainings with regard to mitigating risk within the supply chain, including matters of slavery and human trafficking.