Tremco Incorporated and the California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act requires retailers and manufacturers doing business in California to disclose their efforts to eradicate forced labor and human trafficking from their direct supply chain. The following is the disclosure under the Act for Tremco Incorporated (“Tremco”).

1. Tremco conducts a risk assessment as part of its evaluation of potential suppliers. Among the factors considered in this evaluation are the risks of human trafficking and slavery. Tremco does not employ a third party to conduct the risk assessment.

2. Tremco asks that our suppliers adhere to all applicable laws, standards and regulations that prohibit the employment of forced, bonded or child labor. Tremco includes contractual provisions in procurement contracts prohibiting the applicable suppliers from engaging in slavery and human trafficking. In addition, the terms and conditions of our purchase orders ask suppliers to represent and warrant that they will not knowingly use any slave labor or engage in any human trafficking. Tremco does not believe that the risk of forced labor or human trafficking in its particular supply chain is significant. Accordingly, Tremco does not audit its suppliers for compliance. However, if the risk profile of our supply chain changes, Tremco will consider such an audit.

3. Tremco employees in charge of procurement and supply chain are required to seek appropriate contractual documentation from relevant suppliers regarding their compliance with anti-slavery and anti-human trafficking mandates.

4. Tremco provides education to all employees who work with our procurement and supply chain on the issues involved with slavery and human trafficking as well as the identification and mitigation of such risk in the supply chain.