

## **Disclosure Under the California Transparency in Supply Chains Act of 2010**

Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 (the “Act”) requires many retailers and manufacturers doing business in California to disclose efforts to eradicate slavery and human trafficking from its supply chains.

Oliver supports the goals of the Act and promotes ethical business practices as reflected in Oliver’s Code of Business Conduct. The Code of Business Conduct is distributed to all employees upon hire and redistributed annually, and all Oliver employees are required on an annual basis to acknowledge and certify adherence to the policies set forth therein. Oliver offers regular training on those aspects of the Code of Business Conduct applicable to its employees around the world. Oliver also maintains a business conduct hotline through which any individual may confidentially report suspected violations. Any and all alleged violations of the Code of Business Conduct or other compliance program will be investigated to determine whether corrective action should be taken.

In regard to slavery and human trafficking specifically, Oliver does not condone any type of prohibited, unlawful conduct by its employees, suppliers or business partners. The Code of Business Conduct includes, among other things, a requirement that all employees comply with all applicable laws and regulations. Human trafficking and slavery is a violation of such laws, and would constitute a violation of the Code of Business Conduct. Such a violation could result in disciplinary action against the employee, including termination. Oliver is committed to complying with all applicable laws and regulations in the countries in which it operates, including laws that prohibit slavery and human trafficking.

Oliver typically sources materials from suppliers located in the United States and avoids sourcing from countries where there is a high risk of human trafficking and slavery. Oliver monitors the performance of its suppliers through internally resourced supplier audits and typically does not engage 3rd party auditors. In addition, Oliver’s standard terms and conditions of purchase demand that all materials and products supplied to Oliver be manufactured in accordance with all applicable laws and regulations, which would include laws that prohibit slavery and human trafficking.

Beyond simple compliance with the Act, Oliver is committed to continuing to develop its supply chain management practices around the world, including developing further training, identification and enforcement practices throughout its supply chain.