



California Transparency in Supply Chains Act of 2010 Disclosure Statement

As a manufacturer doing business in the State of California, the following is Sapa Extrusions North America's disclosure as required by the California Transparency in Supply Chains Act of 2010.

1. Sapa Extrusions North America does not currently engage in verification of its product supply chains to evaluate and address risks of human trafficking and slavery, either directly or through a third party.
2. Sapa Extrusions North America does not currently conduct audits of its suppliers to specifically evaluate compliance with company standards on human trafficking and slavery.
3. Sapa Extrusions North America expects its suppliers to comply with the laws in the countries where they are doing business. Sapa Extrusions North America does not currently require direct suppliers to certify, expressly, that materials incorporate into the products they deliver to Sapa Extrusions North America comply with laws regarding slavery and human trafficking of the country or countries in which they are doing business.
4. Sapa Extrusions North America maintains internal accountability standards and procedures for employees or contractors failing to meet legal requirements and company standards generally. Sapa Extrusions North America is part of Sapa AS, a 50/50 joint venture owned equally by Orkla ASA and Hydro ASA and headquartered in Oslo, Norway. Sapa AS has adopted a Supplier Declaration that it is in the process of implementing globally addressing a number of areas, including a prohibition against the use of any form of forced labor. In addition, Internal Audit within Sapa AS maintains a global whistle-blower hotline available for reporting concerns of any kind. Every report of potential misconduct is investigated and outcomes are reported to Sapa Extrusions North America management.
5. Sapa Extrusions North America does not currently provide training to company employees and managers who have direct responsibility for supply chain management specifically on the express topic of human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products. Nonetheless, Sapa Extrusions North America does conduct training on a number of other areas, including its Code of Conduct. This training covers circumstances where management or employees encounter unlawful circumstances, including procedures for reporting or addressing these circumstances.