

California Transparency in Supply Chains Act Disclosure

The California Transparency in Supply Chains Act took effect in the state of California on January 1, 2012. The Act seeks the elimination of slavery and human trafficking from product supply chains and requires companies disclose their efforts to insure that their supply chains are free from slavery and human trafficking.

Ames True Temper requires its suppliers to comply with all applicable laws, including safety, labor and employment laws, counter terrorism, and a code of conduct. Suppliers shall not use any form of forced, bonded, indentured, trafficked, slave, or prison labor, with the exception of government approved programs that utilize convicts or prisoners on parole, supervised release or on probation or in any penal or reformatory institution. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. All workers must not be required to surrender any government issued identification, passports, or work permits as a condition of employment.

Supply Chain Verification

Ames True Temper conducts factory assessments of suppliers on a periodic basis in accordance with our risk-based approach. These assessments are conducted by trained individuals from our Global Sourcing Office.

Supplier Audits

Ames True Temper utilizes announced audits during the new supplier qualification process as one part of our overall supplier compliance strategy. In addition, we have programs to assist suppliers that may include pre-source assessments, specific corrective actions and follow up audits when we are directly made aware of an issue, and a comprehensive risk based re-audit to insure these factories are monitored on a continuous basis.

Supplier Certifications

Ames True Temper has a Supplier Certification Agreement in place with all our suppliers requiring them to comply with international standards and applicable laws and regulations, specifically those related to forced labor, child labor, slavery, and human trafficking.

Supplier Accountability

Ames True Temper believes in remediation not termination provided the corrective actions are immediate and restitution is made when applicable. We will work with the supplier towards remediation and improving factories through capability building, a prescribed corrective action plan, and a comprehensive risk based re-audit.

Training

Ames True Temper conducts training for employees responsible for supply chain management and provides those standards and guidance to insure they are aware of the issues relating to forced labor, child labor, slavery, and human trafficking and how to mitigate such risks.