



## ESG 01.04 California Transparency in Supply Chains Act

### California Transparency in Supply Chains Act of 2010 Disclosure

The California Transparency in Supply Chains Act of 2010 (the Act) requires retail sellers and manufacturers doing business in California with over \$100 million in worldwide gross receipts to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains. Accordingly, the Act requires Ring to disclose, at a minimum, the following:

- **Verification:**
  - Ring asks suppliers to complete a Supplier ESG Questionnaire, inquiring that suppliers conduct risk assessments to identify and mitigate potential risks of involuntary labor, child labor, slavery, and trafficking.
  - Ring with assistance of a third-party consultant performs an annual qualitative Supplier ESG Risk Assessment to ensure compliance of Labor and Human Rights Practices based on publicly available information.
- **Audit:**
  - Currently, Ring does not audit suppliers to evaluate compliance with the company's standards for trafficking and slavery in its supply chain.
- **Certification:**
  - Ring asks direct, tier one suppliers to acknowledge their commitment to Ring's [Supplier Code of Conduct](#), which states compliance to Human Rights. If a supplier fails to meet the requirements, the supplier shall implement a corrective action plan to remedy the non-compliance(s). Ring reserves the right to terminate business with any Supplier that fails to comply with our Supplier Code of Conduct.
  - Ring suppliers agree that they shall not engage nor be complicit in human trafficking or child labor.
- **Internal Accountability:**
  - Employment at Ring is voluntary, prohibiting the use of slave, forced, bonded, indentured, prison, or other involuntary labor.
  - Ring does not hire employees under the age of 18 without prior Human Resources approval.
  - Ring's Whistleblower Policy allows employees to raise concerns or make formal complaints to their immediate supervisor, the Human Resources Department, or use the Human Resources Hotline.
  - Ring's Sustainable Procurement Policy ensures that Ring performs business with suppliers who comply with social, labor, and human rights laws and regulations, and meet the minimum employment age limit defined by national law or by the International Labor Organization ("ILO") Convention 138, whichever is higher.
- **Training:**
  - Ring's purchasing team is required to complete additional training with regards to Slavery and Trafficking, Supplier Code of Conduct and Contract Clauses, and Sustainable Procurement Policy and Reporting to ensure the supply chain is in compliance with Labor Practices and Human Rights.



*Container Technologies*

Ring Environmental, Social, and Governance Policy

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### **REVISION HISTORY**

| <b>Revision</b> | <b>Date</b> | <b>Description of Changes</b>   |
|-----------------|-------------|---|
| 2               | 05/31/2022  | <ul style="list-style-type: none"><li>• Overall policy update</li></ul> |