

California Transparency in Supply Chains Act

October 30th, 2018

The California Transparency in Supply Chains Act of 2010 (SB 657) requires certain retailers and manufacturers doing business in California to disclose their efforts to address slavery and human trafficking in their direct supply chains. Kaléo is committed to upholding human rights in all aspects of its business, and it continually strives to ensure responsible supply chain management. Kaléo is taking the following related efforts, among other initiatives, in connection with its direct supply chain:

- **Verification:** Kaléo does not yet verify its direct supply chain to evaluate and address risks of slavery and human trafficking.
- **Audits:** Kaléo does not yet audit its suppliers to evaluate compliance with company standards prohibiting slavery and human trafficking.
- **Certification:** Kaléo expects all suppliers to maintain the highest ethical standards when carrying out business activities. Kaléo does not yet require suppliers to annually certify compliance with anti-slavery and human trafficking laws in the country or countries in which they do business.
- **Internal Accountability:** Kaléo maintains a Code of Business Conduct & Ethics and other policies that require employees, consultants, and contract workers to comply with all applicable laws, including those that relate to labor practices. Kaléo will take appropriate action if it determines that an employee, consultant, or contract worker has violated a policy or law. The company also takes appropriate action if it determines that a supplier is not complying with all contractual requirements. Kaléo does not yet have internal procedures for determining whether suppliers are complying specifically with company standards regarding slavery and trafficking. Kaléo encourages internal and external stakeholders to report concerns about potential violations of policy and law.
- **Training:** All employees and management receive training on the company's Code of Business Conduct & Ethics and other applicable policies and procedures. Kaléo does not yet train employees and management, who have direct responsibility for supply chain management, specifically on human trafficking and slavery.