



California Transparency in Supply Chains Act Declaration

The California Transparency in Supply Chains Act of 2010 (SB 657) (“Act”) became effective January 1 2012 in the State of California. The Act requires that certain companies doing business in California disclose their efforts to eliminate slavery and human trafficking from their direct supply chains.

The Infinite Electronics Supplier Code of Conduct formalizes the key principles under which suppliers are required to operate. The code includes human rights requirements stating that our suppliers shall be *“committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.”* Requirements are further detailed addressing forced labor, child labor, working hours, wages and benefits, humane treatment, non-discrimination, and freedom of association.

The following activities support our commitment and our efforts to combat slavery and human trafficking:

Verification: Infinite Electronics performs site visits to key suppliers to ensure first-hand knowledge and accountability for business practices and quality standards. Site visits target high volume key partners as well as other suppliers with known risk factors such as geographic location or type of products being produced. Purchasing and Product Management personnel who visit suppliers are trained on the Infinite Electronics Code of Conduct and asked to report any suspected violations to our management team.

Audits: At this time, there are no formal supplier audits deployed across our supply chain. Plans are underway to deploy formal supplier audits in 2018 which will be performed by Infinite Electronics Quality Engineers who will be trained in professional audit techniques. These audits will utilize a checklist based on the Electronics Industry Citizenship Coalition Code of Conduct version 5.0. Auditors will not divulge details of their audit plans prior to site visits to ensure objectivity and integrity.

Certification: All suppliers are required to certify that they understand and adhere to the Infinite Electronics Supplier Code of Conduct. If we become aware of any actions or conditions not in compliance with the Supplier Code of Conduct, we reserve the right to terminate any and all agreements with the supplier.

Internal Accountability: Infinite Electronics, including all subsidiary companies and locations world-wide, are committed to ethically and socially responsible conduct in the workplace. Infinite Electronics requires all employees to read and acknowledge receipt and understanding of our Ethics policies which follow industry leading standards. Anyone who violates these policies is subject to disciplinary action or termination.

Training: Infinite Electronics provides annual training to all employees with direct responsibilities for supply chain management on the Supplier Code of Conduct including mitigating the risks of slavery and human trafficking in the supply chain. This includes Management, Buyers, Supplier Quality Engineers and Product Managers.