Akebono is committed to the protection and advancement of human rights and prohibits any form of forced labor, including slavery and human trafficking, in our supply chain.

In accordance with the *California Transparency in Supply Chains Act of 2010*, Akebono makes the following disclosure:

- 1. <u>Verification of Supply Chain.</u> Akebono's *Purchase Order Term and Conditions* (the "Terms") contain language mandating that all Akebono suppliers abide by all applicable laws and specifically states that suppliers, and the goods furnished by them, must comply with all laws regarding wages, hours, and conditions of employment. Further, all suppliers must abide by the *Akebono Code of Business Conduct* (the "Code"). The Code not only states that it is each associate's responsibility to know and abide by all applicable laws, but encourages each associate to go beyond the letter of the law and to consider whether any action taken is an action that the associate and our company would be proud of.
- 2. <u>Audit.</u> While Akebono audits its suppliers' conformance with other standards, at this time, Akebono does not audit its supply base's adherence to its Code or specifically to laws regarding slavery or human trafficking. Akebono will consider taking such action in the future.
- 3. <u>Certification</u>. As discussed above, the Terms mandate that Akebono suppliers, and the goods produced by them, comply with all laws, including laws regarding wages, hours, and conditions of employment. Through acceptance of the Terms, Akebono's suppliers also warrant that they have reviewed and will abide by Akebono's Code which would also prohibit a violation of any law regarding slavery or human trafficking.
- 4. <u>Accountability.</u> Upon hire, Akebono requires that all associates read and acknowledge receipt and understanding of the Code. In addition, Akebono maintains an Ethics Hotline which allows anyone to advise the company anonymously of any behavior that would constitute a breach of Akebono's robust ethics policy.
- 5. <u>Training.</u> From time to time Akebono provides training on our Code and other Akebono policies. Akebono will consider adding training on slavery and human trafficking to its compliance program.