API Technologies – California Transparency in Supply Chain Act

API Technologies is opposed to all human trafficking and slavery, regardless of where it is taking place. API Technologies generally engages with established reputable businesses in the supply chain and the majority of purchases are from suppliers located in the United States and United Kingdom. API Technologies will implement for new acquisitions within a 2 years. The following disclosures are made in reference to California Senate Bill 657, California Transparency in Supply Chain Act of 2010.

To that end, API Technologies:

Engage in verification of product supply chains to evaluate and address risk of human trafficking and slavery

API Technologies suppliers must comply with supplier flow down requirements. Compliance with all local, state, and federal regulations is flowed down to all suppliers doing business with API Technologies.

Conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.

API Technologies does not audit suppliers for compliance with standards for human trafficking and slavery. However, if there is any reason to suspect that a supplier is not complying, then API Technologies will address the matter with the supplier.

Require direct suppliers to certify that materials incorporated into the product company with the laws regarding slavery and human trafficking of the country or countries in which they are doing business

API Technologies requires suppliers to conform to the supplier quality requirements but does not require suppliers to specifically certify that they are compliant in regard to human rights.

Maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking

API Technology employees are required to acknowledge the API Technologies corporate employee handbook, which addresses our Code of Ethics. API Technologies Code of Ethics does address the compliance with all applicable laws and regulations.

Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products

API Technologies does not specifically train on slavery and human trafficking. However, all employees are subject to the Code of Ethics, in which they are required to comply with laws and regulations.