

California Transparency in Supply Chains Act of 2010 (SB 657)

The California Transparency in Supply Chains Act of 2010 (SB 657) requires covered manufacturers and retailers operating in California to post disclosures about their efforts to eradicate slavery and human trafficking from their supply chains.

GILLIG LLC (“GILLIG”) is a wholly owned subsidiary of Arkay Acquisition LLC (“Arkay”), a holding company established in 2008 by the Crown family to acquire GILLIG. All business transaction of Arkay are conducted through GILLIG.

As laid out in the GILLIG Materials Department Code of Ethics: GILLIG LLC and its affiliates will never use forced, indentured or involuntary labor in any of its operations. As part of our commitment to our local and global communities, GILLIG will not tolerate any instances of human trafficking or other forced labor. We will also never conduct business with any third parties who engage in human trafficking or forced labor.

Verification:

During periodic site visits to suppliers, GILLIG Supply Chain Personnel will review working conditions and note any concerns that involuntary labor may be in use.

Audits:

GILLIG applies a risk-based approach to determine which suppliers require a GILLIG audit. Due to GILLIG’s responsibility to comply with Buy America Requirements (49 CFR 661) our supply chain’s components are largely produced in the United States. Our US based supply chain represents a low risk that forced, indentured or involuntary labor is used to manufacture our components. We continually re-evaluate all risks to our supply chain and adjust audit requirements accordingly.

Certifications:

GILLIG Terms and Conditions require all suppliers to certify that all material was built without the use of forced, indentured or involuntary labor.

Accountability:

GILLIG’s Terms and Conditions require that suppliers certify that all materials sold to GILLIG are produced without forced, indentured or involuntary labor. Failure to comply could result in termination of the supplier relationship. Any GILLIG personnel found to be knowingly using any involuntary labor will be subject to GILLIG’s progressive discipline policy.

Training:

GILLIG provides training to Supply Chain personnel to ensure they are following the Materials Department Code of Ethics and understand GILLIG’s Terms and Conditions.