



# The Giorgi Companies, Inc.

## California Transparency in Supply Chains Act / Slavery and Human Trafficking Policy

The Giorgi Companies, Inc. (TGC) expects its suppliers to comply with applicable laws, which include applicable laws prohibiting the use of child, involuntary or slave labor. The California Transparency in Supply Chains Act requires retailers and manufacturers that do business in California to publicly disclose their efforts to eliminate slavery and human trafficking from their supply chains. To that end:

- (1) TGC's Code of Conduct for Suppliers (information and links are available on this page) sets forth TGC's expectations that its suppliers will comply with appropriate human rights and labor standards in their business operations, including laws prohibiting the use of child, involuntary or slave labor;
- (2) TGC's terms and conditions of purchase require its suppliers to comply with applicable laws, including laws concerning wages and employment;
- (3) TGC conducts audits of certain material suppliers, either directly or through a third party, in a pre-arranged or unannounced fashion, which include an assessment of compliance with such laws;
- (4) TGC provides training to its employees, including its employees with direct responsibility for supply chain management, as well as to others doing business with TGC, on various topics including compliance with laws and its Code of Ethics, and holds its employees and others doing business with TGC accountable for compliance with laws including laws prohibiting the use of child, involuntary or slave labor; and
- (5) TGC reserves the right to terminate or otherwise discipline any employee, or terminate or take legal action against any supplier, who fails to comply with same. While TGC does conduct periodic audits of certain material suppliers (as noted above), at present, TGC does not routinely seek certifications of compliance or maintain a formal program to verify its suppliers compliance with the foregoing. TGC reserves the right to request documentary evidence of such compliance at any time.