

Accella Performance Materials and Subsidiaries disclosure pursuant to the California Transparency in Supply Chains Act of 2010 (SB 657)

Accella Performance Materials and its subsidiaries (Accella) is a specialty manufacturer of formulated polyurethanes and recycled rubber products designed primarily to meet the specifications of its manufacturing customers. Due to the nature of chemical and rubber manufacturing, with complex machinery and processes and relatively low labor requirements, Accella does not believe that there is a substantial risk that its product supply chain involves human trafficking or slave labor.

As such, Accella currently does not engage in verification of its supply chain to evaluate and address the risks of human trafficking and slavery, nor does it currently conduct audits of its suppliers' compliance with standards for trafficking and slavery in their supply chains. Accella also currently does not require direct suppliers to certify that the material incorporated into their products comply with the laws regarding slavery and human trafficking, nor does Accella have internal accountability standards, procedures or training for employees, contractors and management regarding slavery and trafficking. Accella is planning on including in its purchasing Terms and Conditions that suppliers will comply with all laws regarding human trafficking and slavery in the country(ies) in which the supplier is doing business. Accella is also planning on including in its Employee Handbook that employees will comply with laws regarding human trafficking and slavery.

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