

California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires certain retailers and manufacturers doing business in California to provide information regarding their efforts to eliminate slavery and human trafficking in their supply chains. In compliance with the Act, this statement is provided on behalf of Dayton Superior Corporation and its subsidiaries (“Dayton Superior”).

Dayton Superior is committed to the highest standards of lawful, honest, and ethical conduct in all business dealings. This commitment is reflected in various policies and practices that Dayton Superior has had in effect for years. For example, Dayton Superior’s Business Ethics Policy requires, among other things, that Dayton Superior’s employees strictly observe laws and ethical standards in all of the company’s operations and in every area in which it does business.

Verification. Dayton Superior purchases products, components and raw materials from suppliers located in the United States and in foreign countries. Dayton Superior generally verifies its supply chains by doing business with suppliers that are well-established, reputable organizations that respect the legal requirements of the jurisdictions in which they operate. The suppliers typically have formal business conduct or similar policies, which Dayton Superior reviews to ensure that they are consistent with Dayton Superior’s policies. Dayton Superior believes that its suppliers do not engage in illegal slavery or human trafficking, but does not otherwise engage in verification of product supply chains to evaluate and address the risks of slavery or human trafficking. To the extent that Dayton Superior engages in verification efforts, such efforts are not conducted by a third party.

Audits. Dayton Superior expects all of its suppliers to comply at all times with all applicable laws and to engage in honest and ethical business conduct. Dayton Superior would take prompt action if it found evidence that a supplier was engaging in any illegal activity, including slavery or human trafficking. Except as discussed above regarding verification, however, Dayton Superior does not conduct audits of its suppliers to evaluate compliance with Dayton Superior’s standards regarding slavery and trafficking in supply chains.

Certifications. As discussed above, Dayton Superior does business with reputable suppliers that, to its knowledge, are in compliance with the legal requirements of the jurisdictions in which they operate and that typically have formal policies in effect to assure that their business activities will be conducted in a legal, honest, and ethical manner. Dayton Superior’s standard terms and conditions require suppliers to comply with all applicable laws and regulations. Dayton Superior does not require direct suppliers to certify that materials incorporated into its products comply with the laws regarding slavery and human trafficking of the country or countries in which they do business.

Accountability. Dayton Superior follows, and requires all employees to follow, policies that demand lawful, honest, and ethical conduct in every aspect of business dealings, including a Business Ethics Policy that includes the requirement to comply with all laws and regulations of the United States and the other countries in which Dayton Superior does business. Violation of these policies may result in disciplinary action, up to and including termination of employment, or other legal action as appropriate.

Training. Except as stated above regarding Accountability, Dayton Superior does not currently provide employees and management, who have direct responsibility for supply chain management, with training on slavery and human trafficking, including with respect to mitigating risks within the supply chains of products.

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