

YKK AP America Inc.

California Transparency in Supply Chains Act Statement

The California Transparency in Supply Chains Act requires retailers and manufacturers doing business in California to disclose their efforts to eradicate slavery and human trafficking from their direct supply chain. This statement outlines the efforts taken by YKK AP America Inc. (YKK AP) to ensure that slavery and human trafficking are not taking place in our business or supply chain.

- 1. **VERIFICATION**. YKK AP conducts risk assessments as part of its evaluation of potential suppliers to assess and address many risks, including the risks of human trafficking and slavery in our supply chains. During their business relationship with YKK AP, suppliers' compliance will be verified by YKK AP if there is reason to believe that their social responsibilities have not been respected. YKK AP does not engage a third party to conduct the risk assessment.
- 2. **AUDITS**. YKK AP asks that our suppliers adhere to all applicable laws, standards, and regulations that prohibit the employment of forced, bonded, or child labor. YKK AP does not engage a third party to conduct independent and unannounced audits. YKK AP does not conduct regular audits of its suppliers, however, if any of the suppliers' compliance profile were to change, YKK AP would consider formally auditing the suppliers.
- 3. **CERTIFICATION**. YKK AP's Social Responsibility Policy for Suppliers sets forth YKK AP's commitment to social responsibility. As part of the Policy, YKK AP requires that its suppliers adhere to all applicable laws, standards, and regulations that prohibit the employment of forced labor or child labor. YKK AP does not require our suppliers to certify that materials incorporated in the product comply with applicable anti-slavery and human trafficking laws, although suppliers are contractually required to comply with all relevant laws which cover trafficking and slavery.
- 4. **INTERNAL ACCOUNTABILITY**. YKK AP provides every employee with YKK AP's Code of Business Conduct. The Code of Business Conduct provides clear and easy principles that provide guidance in conducting business in an ethical manner. The Code of Business Conduct represents YKK AP's commitment to compliance, employing outstanding corporate citizens, and ensuring that YKK AP's reputation for integrity will endure.

YKK AP has an established internal reporting process. YKK AP's confidential employee hotline is available 24 hours a day, 7 days a week, to our employees to seek advice or raise a concern. Callers can remain anonymous if they choose and the hotline posters encourage employees to do the right thing and are reminded how important it is to act with integrity. The free hotline is managed by an

independent third party. Use of the hotline protects our company, employees, suppliers, and customers from illegal and damaging misconduct. All allegations of violations of the Code of Business Conduct, or other inappropriate behavior, are immediately investigated. If we are apprised of any allegations of forced labor or human trafficking through our hotline or any other source, we will promptly investigate and take action.

YKK AP employees responsible for procurement and supply chain compliance are involved in the supplier verification process. As stated above, the evaluation process involves determining the risk of suppliers utilizing forced labor or participating in human trafficking.

5. **TRAINING**. YKK AP's Code of Business Conduct represents YKK AP's dedication to always doing the right thing, and having an open, lawful, and ethical work environment. YKK AP's Social Responsibility Policy for Suppliers prohibits the employment of forced labor or child labor or discrimination of any kind in our operations. YKK AP respects and values its employees and business partners. YKK AP provides education to all employees responsible for procurement and supply chain management. This education conveys that it is imperative that YKK AP's employees comply with all laws, rules, and regulations, including training on human trafficking and slavery, as well as the identification and mitigation of such risk in the supply chain.