

California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act applies to retail sellers and manufacturers doing business in the State of California with \$100,000,000 or more in annual worldwide sales. The Act requires these businesses to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale.

W&W|AFCO Steel LLC (W&W|AFCO) is committed to complying with all applicable laws providing equal employment opportunities and protection from illegal discrimination. W&W|AFCO has a reputation for quality, integrity and trust between W&W|AFCO and each of the companies with whom it does business. In order to protect and maintain this reputation, W&W|AFCO requires that its managers, employees, and agents conduct themselves with integrity and professionalism and it expects its vendors, suppliers, and subcontractors to adhere to the highest ethical and business standards in the course of their dealings.

Although no specific training is held regarding risks within the supply chain on human trafficking and slavery, W&W|AFCO contractually requires its vendors, suppliers, and subcontractors to comply with all local, state, federal, national, international or foreign law or regulation that applies to its business activities. This includes forbidding and preventing forced or compulsory labor or child labor. Most of W&W|AFCO's purchased steel is made in the USA and those suppliers each have their own Code of Conduct, but W&W|AFCO does not require suppliers to certify compliance. Although W&W|AFCO does not perform formal audits, in over seventy years of business, W&W|AFCO has built strong relationships throughout its supply chain and conducts periodic site visits to manufacturing plants for assessment and verification. If the use of human trafficking or slavery is possible in W&W|AFCO's supply chain, it should be reported immediately to W&W|AFCO.