



The California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 (hereinafter the “Act”) requires certain companies manufacturing or selling products in the State of California to disclose their efforts to eradicate forced labor and human trafficking from their direct supply chains for goods they offer for sale. Grace and its subsidiary companies fully support the purpose and goals of the Act and oppose the use of child labor, slavery, or human trafficking in the manufacture and distribution of our products. We are continually exploring effective methods to eliminate the presence of child labor, slavery, or human trafficking in our supply chain.

In compliance with the Act, Grace makes the following disclosures:

- We do not use forced or involuntary labor, and we comply with all applicable child labor laws. We have adopted a company policy concerning our commitment to comply with all applicable child labor and forced labor laws.
- Through supplier contracts, purchase order terms and supplier onboarding processes, Grace requires suppliers to comply with applicable labor, anti-slavery, anti-human trafficking, and child labor laws in the jurisdictions where they operate. To further our efforts to ensure our suppliers are compliant, we have published a Supplier Code of Conduct that applies to our suppliers and sets forth our expectations regarding our specific commitments against the use of child labor, slavery, and human trafficking.
- We maintain open lines of communication with our suppliers, managers, employees, investors, customers, and other stakeholders on a regular basis on issues relating to child labor, forced labor, and human trafficking. Grace conducts training on human rights to all employees as part of its compliance training program and provides targeted training and awareness programs to relevant employees in procurement as part of Grace's Human Rights Supply Chain Due Diligence program.
- Grace maintains a Supply Chain Due Diligence Program designed to identify, evaluate, and address potential risks associated with forced labor, child labor, slavery, and human trafficking. The process identifies and elevates certain risk categories relating to these issues, and triggers defined mitigation actions. Suppliers identified as presenting elevated risk that do not meet Grace's risk thresholds are subject to enhanced monitoring, document review, corrective action plans, supplier audits or de-sourcing. Grace continuously reviews its due diligence processes to support effective monitoring and mitigation of risks.