



VISUAL COMFORT & Co.

California Transparency Supply Chain Act of 2012 (CASB 657)

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In accordance with the requirements of the California Transparency Supply Chain Act of 2012 (CASB 657) Visual Comfort & Co. (VCC) provides the following disclosures.

Visual Comfort & Co. (VCC), is committed to legal compliance and ethical business practices in all our operations worldwide and is firm in our resolve to do business only with those vendors, suppliers, and contractors which share in that commitment. In support of this commitment, VCC requires that all vendors who provide direct and indirect materials that they sign, agree and comply with our Supplier Quality Manual, which includes the Code of Conduct. This Code of Conduct is based on SA8000 and other international human rights standards. It outlines the expectations we have of our suppliers on fair labor practices, health and safety, ethics and anti-bribery.

In addition, VCC has partnered with Assent, Inc. a leading practitioner in risk management and data collection, to collect answers to a series of questions and provide a risk assessment for each supplier on questions related to forced labor and child labor. Suppliers are actively engaged with to lower the risks and assure compliance. VCC also audit its largest suppliers on a yearly basis and any potential new supplier. A large % of spend of our supply base have also been audited by 3rd party social compliance auditing firms. No major non-compliances have been found. All risks that were identified were also addressed with an action plan.

We have established a cross-functional ESG team which is responsible for implementing our human rights commitments, including and in relation to child labor and forced labor. This team is led by our Chief Operating Officer, who has day-to-day responsibility for ESG issues such as climate impacts, responsible sourcing and human rights. This team ensures VCC expectations are communicated to employees and suppliers. It is also responsible for ensuring that relevant staff who select and interact with suppliers, including purchasing staff, receive training on how to identify, prevent and address risks of forced labor and child labor in the supply chain. Training about our ESG program and forced labor risks have been held for purchasing team in 2023 and will be annual.

Our aim is to provide effective identification and remedy if there is evidence that we have contributed to any impacts. We will use our leverage to encourage our suppliers and partners to provide remedy where we find impacts directly linked to our business operations or products. Our internal employee handbook promotes and allows our employees to raise grievances and seek remedy.

In the event of any forced or child labor findings, we take immediate action to remediate the situation. This includes working with the supplier to address the issue, providing support for affected individuals, and, if necessary, terminating the relationship with the supplier.