

Anti-Human Trafficking and Slavery Statement

The ALC Group and Burd & Fletcher wholly support the elimination of human trafficking and slavery from its supply chain. ALC does not tolerate human trafficking and prohibits the use of forced labor, including indentured labor, slave labor and any form of human trafficking.

ALC expects its suppliers to refrain from the direct or indirect use of forced labor, including indentured labor, slave labor and any form of human trafficking. ALC believes that the nature of its business and the environment in which it operates mitigate the risk of slavery and human trafficking taking place within its supply chain. ALC informally monitors its supply chain to evaluate the risks of noncompliance involving slavery and human trafficking issues. This monitoring effort is conducted by ALC, and not by a third party. ALC will not knowingly do business with any supplier that supports, condones or otherwise has issues with slavery, human trafficking or forced labor.

In general, ALC's suppliers are required to comply with applicable laws and regulations in providing ALC goods, products and services, although ALC does not currently require its direct suppliers to make any certifications regarding human trafficking or slavery. ALC informally monitors its supply chain and assesses all potential suppliers in an effort to detect any issues, but does not currently conduct any formal audits. If a supplier is determined to have violated applicable laws or has a higher level of risk in this regard, ALC will take all appropriate action, which may include auditing the supplier's facilities.

Given that the nature of ALC's business and the environment in which it operates mitigate the risk of slavery and human trafficking taking place within its supply chain, ALC does not currently have any specific standards or procedures in place that pertain to slavery and human trafficking or conduct any specific management or employee training on issues of slavery and human trafficking.

