



California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act, (SB 657) which became effective on January 1, 2012, is intended to ensure large retailers and manufacturers provide consumers with information regarding their efforts to eradicate slavery and human trafficking from the supply chains.

Zeus is committed to ensuring it takes no part in any modern slavery or human trafficking as we have a responsibility to be alert to the risk in our business and supply chains. We act ethically and with integrity in all our business relationships and are committed to taking reasonable steps to ensure slavery and human trafficking are not taking place within suppliers that have business relationships with Zeus. The following activities support our efforts to combat slavery and human trafficking.

Verification

The Zeus' purchase order Terms and Conditions and Supplier Code of Conduct requires suppliers to maintain compliance of all applicable laws and regulations, including anti-slavery and human trafficking laws, with respect to the supply of services or materials.

Audits

Zeus does not conduct on-site audits for the sole purpose of evaluating suppliers for compliance with human trafficking and slavery. Zeus plans to monitor suppliers based on our assessment of the level of risk for slave labor or human trafficking practices based on the countries where the suppliers operate.

Certification

Based on a risk assessment of the supply chain, Zeus may request suppliers to certify that the materials incorporated into the products they supply to Zeus are in compliance with anti-slavery and human trafficking laws in the countries in which they are doing business.

Internal Accountability

Zeus maintains a Code of Conduct for our team members and suppliers. When Zeus uncovers team member or supplier not in compliance with our Code of Conduct, the result, depending on the severity of noncompliance may result in a disciplinary action, corrective action or termination of the relationship.

Training

Every member of our procurement staff receives training on company policies, practices, and procedures designed to ensure that our supply chain is free of any type of coerced labor, including how to spot warning signs of potential human rights violations. This training is managed through our internal training system LMS.