**Commitment to the California Transparency in Supply Chains Act 2010 (CTSCA)**

The CTSCA requires retailers and manufacturers doing business in the state of California to disclose efforts to eradicate slavery and human trafficking from its direct supply chain to tangible goods offered for sale.

Scapa makes this statement in accordance with the CTSCA:

**Verification and Audit**

1.   Scapa continuously assesses the risk of non-compliance with the CTSCA within the direct supply chain.

2.   Scapa’s procurement team evaluates current suppliers with regard to performance and compliance in line with the Scapa Supply Chain Corporate Social Responsibility Statement. We do not use third parties for evaluation. The Scapa Supply Chain Corporate Social Responsibility Statement sets out basic principles of conduct for suppliers doing business with Scapa including a requirement for suppliers (themselves and through their own supply chain) to comply with laws relating to forced labor, human trafficking and slavery.

3.   Prior to partnering with any suppliers we may conduct an initial screening process which may include a pre-arranged visit. The decision to undertake the initial screening is based on spend and sustainability risk (taking into account CTSCA risks, geographic location, workforce profile, and manufacturing processes).

4.   We consider the overall risk of non-compliance by Scapa is low and therefore do not systematically audit our suppliers for compliance.  If we suspect, or become aware through credible information, that a supplier may be non-compliant we will conduct a thorough investigation.  Non-compliance may result in termination of such business relationships.

 **Certification**

5.   We do not require our direct suppliers to certify that they comply with anti-slavery and human trafficking laws in the country or countries in which they do business.

**Internal Accountability and Training**

6.   Training on the content and application of the CTSCA is provided to all procurement employees. This also raises awareness of the Scapa Corporate Social Responsibility Policy and how to spot warning signs of potential human rights violations.