

DISCLOSURE STATEMENT

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

ASHTA Chemicals Inc.'s dedication to responsible business relationships includes efforts to eradicate slavery and human trafficking from its supply chains. Our suppliers are expected to comply with all labor standards and worker protections with regard to human rights issues.

ASHTA Chemicals maintains a Corporate Policy of Business Ethics and Conduct which requires ethical conduct in dealing with government entities, the general public, ASHTA's customers, creditors, suppliers, competitors and personnel.

- ASHTA supply contracts allow ASHTA to conduct both internal and external audits. Although the audits our personnel perform do not directly address forced labor and human trafficking, should we believe there exists a plausible risk of engagement in this practice, we will undertake verification efforts using appropriate resources and respond accordingly.
- ASHTA's Standard Terms and Conditions require suppliers to comply with all applicable labor laws, including those prohibiting forced labor and human trafficking. A supplier's failure to comply with this provision constitutes a breach of contract that would enable ASHTA to terminate the contract.
- ASHTA provides Human Rights training, which includes education on human trafficking and slavery and how to ensure those risks are properly addressed within ASHTA's supply chain, periodically to all employees with supply chain responsibilities. An employee's failure to comply with ASHTA's Corporate Policy of Business Ethics and Conduct, which includes obligations to protect against human trafficking and slavery in ASHTA's business and supply chains, will result in disciplinary action, up to and including termination.