



## **Disclosure on California Transparency in Supply Chains Act of 2010**

The State of California Transparency in Supply Chains Act of 2010 (the “California Supply Chains Act”) requires that manufacturers and retailers, doing business in California, disclose their efforts to eradicate slavery and human trafficking from its supply chain. The law was designed to increase consumer’s knowledge about the products they buy and the companies they choose to support.

Tredegar Corporation and its subsidiaries, which includes but is not limited to Bonnell Aluminum (Corporate), Inc., Bonnell Aluminum, Inc., Bonnell Aluminum (Elkhart), Inc., Bonnell Aluminum (Niles), LLC, Bonnell Aluminum (Clearfield), Inc., Bright View Technologies Corporation, Tredegar Personal Care, LLC, Tredegar Surface Protection, LLC, Tredegar Film Products Corporation, Tredegar Film Products (Latin America) Inc. and Terphane LLC (the “Company”) are firmly opposed to any form of forced labor, human trafficking and slavery, and has had a long-standing policy against child labor. We comply with the employment and labor laws of every country in which we operate and expect the same from those with whom we do business.

Under the California Supply Chains Act, we are required to disclose to what extent, if any, the Company:

Engages in Verification of Product Supply Chains to Evaluate and Address the Risk of Human Trafficking and Slavery. The Company routinely assesses risk related to its supply chain. This assessment is primarily based on supplier quality performance, credit issues, the type of transaction, the geographic location and other relevant business and legal criteria, but does not currently include risk assessment regarding human trafficking and slavery.

Conducts Audits of Suppliers to Evaluate Supplier Compliance with Company Standards for Trafficking and Slavery in Supply Chains. Depending on the level of risk associated with a particular good or service, the Company has audit rights in its supplier contracts that generally address legal compliance issues. In addition, depending on the nature of the service or good, the Company may elect to visit supplier sites to investigate and assess product and contractual compliance issues. To the extent that the Company suspects that any supplier is violating the law by engaging in slavery and human trafficking, we will investigate, and take appropriate action, which may include audits, notifying the police and/or eliminating the supplier from our

supply chain. Otherwise, the Company does not routinely conduct audits of suppliers to evaluate supplier compliance with its policy against child labor, and does not have specific standards or a policy for trafficking and slavery in supply chains.

Requires Direct Suppliers to Certify that Materials Incorporated into the Product Comply with the Laws Regarding Slavery and Human Trafficking. The Company expects its suppliers to comply with all local laws, including employment and labor laws, and the Company's Vendor Code of Conduct specifically provides that no vendor will use illegal child labor, or engage in any form of forced labor, human trafficking or slavery. See <https://tredegar.com/wp-content/uploads/2019/06/Vendor-Code-of-Conduct.pdf>. Our contracts and purchase orders routinely contain provisions to such effect. We expect our vendors to evaluate the level of risk of a particular good or service, and develop appropriate checks, processes and accountability standards to manage such risks internally and in its supply chain. Depending on the supplier, the Company may require more specific anti-slavery and -human trafficking contractual provisions. Other than as described, the Company does not have a formal certification process regarding compliance with laws regarding slavery and human trafficking.

Maintains Internal Accountability Standards and Procedures for Employee and Management Failing to Meet Company Standards Regarding Slavery and Trafficking. Company employees are expected to fully comply with the letter and spirit of the laws applicable to our business. Our child labor policy included in the corporate employee handbook, and is conspicuously posted at our international sites and certain domestic locations. All employees receive training on our Code of Conduct upon hire, and annually thereafter. As stated in our Code of Conduct, it is the personal affirmative responsibility of all employees to learn what laws and policies apply to their assigned duties and responsibilities so that they can identify legal and ethical issues that may arise. As part of our Code of Conduct, we are committed to maintaining an environment that respects all individuals. Failure to comply with the Code of Conduct, or Company policies, may result in disciplinary action, up to and including termination of employment. If a supplier fails to comply with any laws, including employment and labor laws, the Company may terminate the supplier relationship.

Provides Company Employee and Management, who have direct Responsibility for Supply Chain Management, Training on Human Trafficking and Slavery, and Mitigation of Risks. As noted above, our employees are trained annually on our Code of Conduct. Based on our annual risk assessment review, we periodically train certain employees and management who have direct responsibility for supply chain management on human trafficking and slavery and who can assist in mitigating those risks.