

# NDX Statement on Forced Labor and Human Trafficking

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**On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (Cal. Civ. Code § 1714.43) went into effect. This law, passed by the California state legislature, is to increase the amount of information made available by retailers and manufacturers concerning their efforts to eradicate slavery and human trafficking from their supply chains. The disclosures are intended to provide consumers with the ability to make better and more informed choices about which products they use and the companies they support.**

## SUMMARY

National Dentex, LLC (NDX) and its subsidiaries are committed to maintaining and improving its systems and processes to avoid complicity with human rights violations related to our operations, our supply chain and our products. NDX acknowledges that forced labor and human trafficking can be connected to different practices such as slavery, child labor, bonded labor, retention of identity documents, withholding of wages and deception and false promises among others. Therefore, throughout this disclosure, we use the term “forced labor” to encompass the various practices related to this topic.

NDX has a zero-tolerance policy for any such forced labor practices used in its operations, supply chain or the manufacture of its products. As discussed below, NDX takes certain steps throughout the year to ensure that forced labor is not taking place in our supply chains or any other part of our business. Specifications are detailed below.

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## OUR CODE OF CONDUCT

Our commitment to human rights is outlined in the NDX Code of Conduct. Every employee, officer and director of NDX must know, understand and follow the Code as well as the procedures and related policies referenced in it. This is what we expect and rely on when we work with one another, interact with customers, address stakeholders, collaborate with business partners, and contribute to our communities.

### **Our Code dictates that:**

- We will make ethical decisions
- We will maintain a safe and healthy workplace
- We prohibit harassment and discrimination
- We aim to achieve a diverse and inclusive work place
- We protect human rights and strive for responsible sourcing
- We do not allow retaliation against anyone who raises a concern about any labor or employment practices

## SUPPLIER CODE OF CONDUCT

We require our suppliers and business partners to conduct their operations ethically. Each of our suppliers is asked to adhere to the NDX Supplier Code of Conduct. The Supplier Code requires our suppliers and business partners to commit to human rights and honor a higher standard when applicable laws and regulations differ.

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## VERIFICATION AND AUDITS

NDX takes steps to verify, evaluate and address risks of forced labor in our supply chain. The first step is to set clear expectations for our suppliers with the Supplier Code of Conduct and contractual language. Additionally, we perform due diligence to verify our supply chain is adhering to laws and ethical standards. Due diligence is conducted by a reputable third party through a risk based approach.

## INTERNAL ACCOUNTABILITY AND TRAINING

Through NDX's Code of Conduct and clear direction set by our CEO, it is clear we do not condone child, forced, indentured, bonded or like practices. Our Procurement Department coordinates with the Compliance Department to establish policies, procedures and processes for managing compliance to all sustainability topics, including forced labor and human trafficking, both at our internal operations, as well as the supply chain. NDX continues to look for ways to enhance its compliance program and training.