

Modern Slavery Act Transparency Statement

September 1, 2024

True Manufacturing Co., Inc. and its affiliated entities, including True Refrigeration UK Ltd. (collectively “True”) conduct our business in accordance with all applicable laws, rules and regulations of the countries in which we do business, including laws against human trafficking and slavery (“HTS”). We require our officers, employees, and business partners to do the same. We have zero tolerance for modern slavery and human trafficking.

To ensure our supply chain complies with our values and ethics, True has taken the following actions:

- Obtained certifications from each of our direct suppliers that material incorporated into True products complies with all human trafficking and slavery laws in the countries in which they do business.
- Issued a Supplier Code of Conduct applicable to all True suppliers that sets minimum standards suppliers must meet in order to supply products to True, which includes commitments to treat workers fairly and prohibits any form of forced labor throughout the supply chain. A copy of our code of conduct is available at: <https://www.truemfg.com/wp-content/uploads/2023/11/Supplier-Code-of-Conduct.pdf>;
- Incorporated supplier commitments to the True Supplier Code of Conduct and warranties specifically that goods supplied to True will not incorporate any sort of forced labor into True’s Master Purchase Agreement for parts suppliers.
- Partnered with third-party supply chain compliance solution Assent to assess the risk of human trafficking & slavery in our supply chain through supplier risk surveys, STRT collection, and real-time monitoring for HTS risks.
- Trained our Purchasing Department on HTS risks and the importance of ensuring our suppliers meet our values.

We are in the process of taking steps to further our HTS commitment by:

- Conduct risk-based audits of suppliers for compliance with True HTS standards;
- Implement formal accountability procedures for suppliers and contractors failing to meet company standards regarding HTS;
- Implement a training program for all True supply chain employees and management on how to mitigate risks within the product supply chain.

Respectfully,

A handwritten signature in black ink, appearing to read "Steve Trulaske".

Steve Trulaske
Owner/Director