



## **CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT STATEMENT**

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires large manufacturers who do business in the State of California to publicly disclose their efforts to eradicate slavery and human trafficking from their supply chains.

SK Pharmteco Inc. and its subsidiary, AMPAC Fine Chemicals LLC, operate as a U.S.-based custom manufacturer of active pharmaceutical ingredients and registered intermediates. We strive to reliably deliver quality products that save and improve lives. As part of this, we are committed to ensuring that quality, safety, and ethical standards are maintained throughout our supply chain. In accordance with the Act, this statement articulates our efforts to eradicate slavery and human trafficking from our direct supply chain.

### **Verification**

We do not currently utilize a third party to evaluate our global supply chain to determine, evaluate or address the risk of slavery and human trafficking. However, we expect all of our suppliers to maintain and adhere to a culture of dignity and respect in accordance with our Supplier Code of Conduct. Our personnel evaluate our suppliers to determine the risk of slavery and human trafficking, and we do not tolerate our suppliers engaging in such conduct.

### **Audits**

In addition to adhering to our Supplier Code of Conduct, our suppliers are expected to conduct and maintain their businesses in accordance with all applicable laws and regulations. We do not currently utilize a third party to audit our suppliers to evaluate compliance with our applicable policies. However, our personnel, through our Supplier Business Review program, evaluate our suppliers’ adherence to our Supplier Code of Conduct and other policies, and we reserve the right to conduct periodic, unannounced inspections or audits to determine compliance.

### **Commitment**

We require our suppliers to commit that they will comply with our Supplier Code of Conduct, including that they do not engage in slavery, human trafficking, or any form of forced, bonded, indentured, or prison labor. Our suppliers are also required to commit to complying with all applicable laws and regulations.

### **Internal Accountability Standards**

We have internal policies, including our Code of Ethics and Business Conduct, that require our employees, in addition to those entities and individuals that we do business with, to adhere to our principles, including by not tolerating slavery, human trafficking, or the use of child labor. We rely on voluntary reports of non-compliance, which our employees and suppliers may make without fear of retaliation. We vigorously investigate any reports of non-compliance and take



appropriate remedial action, including termination. Any non-compliance by our suppliers can result in termination of the business relationship pursuant to our Supplier Code of Conduct.

### **Training**

We are committed to adhering to the highest standards of conduct in our internal policies. We maintain, review and update our policies, including those policies requiring compliance with applicable laws and regulations, as well as prohibitions on slavery and human trafficking. When hired, our employees are required to review our Code of Ethics and Business Conduct, which requires compliance with applicable laws and regulations in the countries in which we do business. Additionally, this policy strictly prohibits forced labor, slavery and human trafficking. This policy also provides our employees with the means to confidentially report any violations without fear of retaliation. Violations of our Code of Ethics and Business Conduct may result in disciplinary actions, up to and including termination. Our purchasing personnel also receive training on matters addressed within the Act.