



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

The California Transparency in Supply Chains Act of 2010 requires large manufacturers and retailers doing business in the State of California to disclose efforts to eradicate slavery and human trafficking from their supply chains.

MC Assembly and its subsidiaries (collectively, “MC Assembly”, “the Company”, “we”, or “our”) believe in the importance of international labor and human rights standards. MC Assembly fully supports efforts to combat, prohibit, and prevent human trafficking and slavery. As a company policy, we do not knowingly employ slaves or trafficked persons.

MC Assembly provides contract electronic manufacturing services for printed circuit board assemblies. MC Assembly is contractually bound to procure components for the assemblies from the Approved Vendor List (AVL) provided to us by our customers.

Pursuant to the requirements of California Transparency in Supply Chains Act, the Company hereby discloses the extent to which it does each of the following:

- (1) Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.

The Company does not engage in verification of product supply chains to evaluate human trafficking and slavery law compliance of its vendors. We do not verify compliance by means of a third party audit or other review.

- (2) Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.

The Company does not audit suppliers to evaluate supplier compliance with company standards for human trafficking and slavery in supply chains.

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- (3) Requires a direct supplier to certify that materials incorporated into a product comply with human trafficking and slavery laws in the country or countries in which that supplier is doing business.

Currently, the Company does not require our direct suppliers to certify they comply with human trafficking and slavery laws in the country or countries in which they do business.

- (4) Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding human trafficking and slavery.

Our terms and conditions of purchase require supplier and supplier's subcontractors to comply with all Federal, State and local laws applicable to the order and the materials or services delivered. Further, we have a code of business conduct that requires all employees to comply with applicable laws in the conduct of their employment responsibilities. Should the company be made aware of any violation of law by an employee, supplier, or contractor in the production and supply of material or services rendered, the Company reserves the right to take appropriate disciplinary measures, which may include, but are not limited to, reporting any violation to appropriate governmental authorities and/or terminating the Company's relationship with any such violator.

- (5) Provide company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks with supply chains of products.

Currently, company employees and management, including our Director of Procurement and the Purchasing Manager, who have direct responsibility for supply chain management, receive training on human trafficking and slavery, including with respect to mitigating risks within the supply chain of products. The Company uses the Human Trafficking Awareness Training Program (TIP 101) provided by the Office by the U.S. Department of State's Office to Monitor and Combat Trafficking In Persons as its training program.