



California Transparency in Supply Chains Act (SB 657) Statement

The California Transparency in Supply Chains Act (SB 657) requires many companies, including Pulse Electronics, to disclose on their websites the efforts they take to eradicate slavery and human trafficking from their direct supply chains. SB 657 requires disclosures regarding verification, auditing, certification, internal accountability and training.

Verification

Pulse Electronics' core business philosophy is to conduct business with uncompromising integrity and professionalism. Pulse Electronics implements its policies in alignment with the guidelines and best practices adopted by members of the Electronics Industry Citizenship Coalition (EICC). The EICC is comprised of leading electronics industry companies that have joined together to promote responsible working conditions, ethical business practices, and environmental stewardship globally throughout the electronics industry supply chain. EICC members adhere to a common EICC Code of Conduct, which addresses supply chain performance expectations for labor, health and safety, environmental practices, ethics and management systems.

Pulse Electronics and its subsidiaries expect suppliers to comply with the EICC code regardless of local business practices or social customs, and as may be requested by Pulse Electronics, to demonstrate adherence to those codes.

Auditing

Pulse Electronics reserves the right to audit its suppliers. Pulse Electronics has not engaged third parties to conduct audits. However, some of our suppliers have been audited by third parties retained by other EICC member companies. Audits are typically announced prior to being conducted.

Certification

Pulse Electronics' Code of Business conduct requires compliance with all applicable laws, including laws against slavery or human trafficking.

Internal Accountability

Pulse Electronics requires all team members and contractors to follow the standards and principals set forth in Pulse Electronics' Code of Business Conduct and Ethics, as well as the Code of Conduct of the EICC. Team members who fail to comply are subject to disciplinary action and contractors who fail to comply may be dropped from Pulse Electronics' supply chain.

Training

Pulse Electronics provides managers and its employees who have direct responsibility for supply chain management with knowledge and information regarding Pulse Electronics' requirements, including EICC compliance.