

California Transparency in Supply Chains Act of 2010

Finelite, Inc. ("Finelite") recognizes the importance of making efforts to ensure that our supply chain is free of any products of forced labor, child labor, human trafficking and slavery. To that end, Finelite is in the process of studying existing supply chain operations and developing a company policy in an effort to ensure, to the extent practicable, that our supply chain is free of any products of forced labor, child labor, human trafficking and slavery.

It is expected that this policy will address issues related to:

VERIFICATION

verification of product supply chains to evaluate the potential for products of forced labor, child labor, human trafficking and slavery to be present in its direct supply chain (Finelite does not presently follow a formal policy for verification related to such issues);

SUPPLIER AUDITS

the possibility of auditing suppliers should Finelite become aware of any credible indication of potential inhumane labor practices on the part of a direct supplier (Finelite conducts formal visits or observations on occasion but does not presently follow a formal policy for auditing suppliers with respect to such issues);.

CERTIFICATION

supplier certification in writing that materials incorporated into their products comply with the laws regarding forced labor, child labor, human trafficking and slavery in the country or countries where they do business (Finelite requires its contract suppliers to comply with all applicable laws and regulations but does not presently follow a formal policy for independent certification by all suppliers);

INTERNAL ACCOUNTABILITY

maintaining internal accountability standards and procedures for suppliers failing to meet company standards regarding avoidance of forced labor, child labor, human trafficking and slavery (Finelite does not presently follow a formal policy related to such issues);

TRAINING

providing company employees and management, who have direct responsibility for supply chain management, training on forced labor, child labor, human trafficking and slavery, particularly with respect to mitigating risks within the supply chain of products (Finelite does not presently follow a formal policy related to such issues).