

California Supply Chains Act

We purchase materials used in our manufacture of metals such as nickel alloy products, which metals constitute our sales. Our direct suppliers are in large measure located in the United States and Europe. The extent of our activities in connection with the Act is informed by our awareness of the low risk that our suppliers are engaged in the activities that the Act addresses. The following identifies the extent of our actions in the absence of actual knowledge or an informed belief that a supplier is engaging in prohibited activities:

Verification:

Our verification activity requires our suppliers to agree and confirm that they comply with all applicable laws including the Act. We do so by means of our purchase order form and contract formation pursuant to our General Terms and Conditions. We handle this verification ourselves and do not use a third-party.

Supplier Audits:

Our purchase orders require compliance with our General Terms and Conditions which provide for our right to audit our suppliers. Because of the low risk that our suppliers are engaged in the activities the Act addresses and in the absence of actual knowledge on our part that any of our suppliers engage in such activities we do not conduct audits directed at such activities.

Certification:

Our purchase orders require compliance with our General Terms and Conditions which provide as part of contract formation for certification by our suppliers that they comply with the laws of the United States, including the Act, as well as the trafficking laws of the countries in which they do business. A violation of this certification constitutes a breach of our contract allowing us to terminate the contract and to seek the remedies afforded by law.

Internal Accountability:

We maintain a Code of Conduct that obligates all of our employees to comply with laws and the penalties for violations run from warnings to dismissal. Our employees work in Florham Park, New Jersey and Reno Nevada and we have no reason to believe that any engage in or have ever engaged in the activities the Act addresses. All of our independent contractors work for us in the United States, are subject to our Code of Conduct and, again, we have no reason to believe that any engage in or have ever engaged in the activities the Act addresses. Responsibility for the materials that we purchase for manufacture and sale of our products rests with our purchasing department, which is tasked with the review of every contract formed following acceptance of our purchase orders to verify acceptance of our General Terms and Conditions including the certification relevant to the Act.

Training:

We conduct employee training annually, typically with our Human Resource officer and, periodically, also with our outside counsel. Our employees and management and any new hires who have direct responsibility for supply chain management will be expected to receive training and/ training updates to mitigate the already low risks in our supply chain management. The extent of this training is to review our verification and certification protocols.