California Transparency in Supply Chain Act

Blue Raven is committed to best practices with respect to responsible business conduct. We expect that our suppliers conduct business the same way we do: ethically and with respect to the law. The Blue Raven Code of Conduct reaffirms the company's zero tolerance for Human Trafficking in any form and our Terms of Conditions further mandates this zero-tolerance policy from our suppliers. More specifically, the California Transparency in Supply Chains Act of 2010 (the "Act") requires retailers and manufacturers to provide consumers with certain information about their efforts to eliminate human trafficking and slavery from their supply chains for which the following actions have been employed:

Verification. Blue Raven regularly evaluates all suppliers and reserves the right to verify measures taken by suppliers to comply with their agreements or contracts with Blue Raven, including compliance with applicable laws.

Audit. Blue Raven regularly audits suppliers and may require suppliers to undergo regular independent audits to evaluate supplier and subcontractor compliance with their agreements, particularly with respect to Blue Raven's standards for its supply chain, and all applicable laws.

Supplier Certification. All of Blue Raven's procurement agreements with suppliers require such suppliers to represent and warrant that they comply with all applicable laws in the performance of their agreement or contract with Blue Raven.

Accountability. Blue Raven's Code of Conduct is provided to and discussed with every Blue Raven employee. The Code of Conduct requires that every director, officer, and employee comply with all laws, rules, and regulations, and promptly report any illegal or unethical conduct of which they become aware. The Code of Conduct strongly encourages employees to express concerns over unethical behavior, provides specific steps to report any actual or suspected wrongdoing, and strictly prohibits retaliation against an employee for such reporting. Failure to comply, or disclose a failure to comply, with the requirements and standards set forth in the Code of Conduct will result in disciplinary action up to and including termination.

Training. Blue Raven provides training to each of its employees, including those who have direct responsibility for supply chain management, regarding our Code of Conduct, so each employee is better able to identify and report risks associated with unethical or unlawful behavior at any stage in Blue Raven's supply chain.