

Disclosure Statement | Effective September 2015

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

The *California Transparency in Supply Chains Act of 2010* (the "Act") requires certain disclosures by large retailers and manufactures doing business in California. Those disclosures must include a company's efforts, if any, to extirpate slavery and human trafficking from their product supply chain. The purpose of the Act is to provide consumers with necessary information to assist them to make purchasing decisions.

Lucas Oil Products, Inc. ("Lucas Oil") is committed to the eradication of slavery and human trafficking in our supply chain. We expect our direct suppliers to adopt sound human rights practices, to eliminate slavery and human trafficking in their workplace, and to treat workers fair and with respect and dignity.

• <u>Verification</u>: As a general practice, Lucas Oil's standard Supplier agreements require each supplier to comply with all applicable federal, state, and local laws as well as all codes, orders, ordinances, rules, regulations, and governmental requirements in the country or countries in which they operate. At this time, Lucas Oil does not use a third party to conduct verifications; rather, all such verifications are conducted internally.

• <u>Audit</u>: Lucas Oil's standard Supplier agreements permit Lucas Oil to confirm whether suppliers are in compliance with their quality and performance standards, which includes the eradication of slavery and human trafficking. Lucas Oil anticipates conducting such audits on an announced or unannounced basis through use of a third party or use of its own personnel.

• <u>Certification</u>: Lucas Oil is in the process of implementing a procedure that will require Suppliers to certify that they comply with the laws of the United States or the laws of other countries in regards to slavery and human trafficking.

• <u>Internal Accountability</u>: All Lucas Oil directors, officers, employees and agents are held accountable for adhering to the standards and values set forth in Lucas Oil's Code of Conduct. Any violation of the above-mentioned policy and procedures may result in disciplinary action which includes termination of contract or employment.

• **<u>Training</u>**: Lucas Oil is in the process of developing training for its management and employees who have direct responsibility in regards to the management of our supply chain.

Lucas Oil remains committed to the eradication of slavery and human trafficking in our supply chain as we continue to expand our business activities and work with Suppliers domestically and globally to meet the needs of our consumers.