



## Toxic Substance Control Act (TSCA) Policy Statement

Kele, Inc. supports the goal of the TSCA Restrictions (PBT) regulation as it pertains to TSCA Restrictions (PBT) categorized products.

Kele distributes over 150,000 products from over 300 vendors, both Branded and Private labeled. As a privately held company many levels removed from the supply chain origin for these products, Kele is not subject to the complete rules or reporting requirements of TSCA Restrictions (PBT). However, Kele is committed to acting in a socially and environmentally responsible manner and to working with its customers to supply products that meet the customer's specifications.

In furtherance of these commitments, Kele sets forth the following policy:

### Policy:

- Kele supports the aims and objectives of the TSCA Restrictions (PBT) regulations concerning TSCA Restrictions (PBT) categorized products.
- Kele will make available this policy upon any request from our supply partners or customers.
- Kele expects that all of its current and future manufacturing and supply partners will comply with applicable law, including TSCA Restrictions (PBT). This will include the following:
  - **Supplier Requirements:**
    - **All Suppliers to Kele, Inc. shall fill out and return to Kele the TSCA Restrictions (PBT) Supplier Compliance Declaration Form, or submit to Kele on company letterhead, their statement concerning TSCA Restrictions (PBT) compliance regulations for their products.**
    - Ensure that all materials in their supply chain that are sold to Kele, Inc. have been verified as to whether or not they comply with TSCA Restrictions (PBT).
    - Suppliers shall develop TSCA Restrictions (PBT) policies, due diligence frameworks, and management systems that are designed to provide information as requested by Kele, Inc. and its customer for the products sold to Kele, Inc.
    - Implement and communicate to their personnel and suppliers policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same.
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- Maintain reviewable business records supporting TSCA Restrictions (PBT) policies and standards; and At Kele, Inc.'s request, provide Kele, Inc. with information concerning the TSCA Restrictions (PBT) compliance for products sold to Kele, Inc. As such, Kele, Inc. shall be entitled to use or disclose this information so as to satisfy any legal or regulatory requirements, customer requests, or any marketing communications, notwithstanding the terms of any confidentiality agreements that do not specifically reference this paragraph.
- Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in TSCA Restrictions (PBT) supply chains.
- **Consequences for Supplier Non-compliance:**
  - Kele, Inc. evaluates its relationships with its suppliers on an ongoing basis.
  - Kele, Inc. reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.
  - Kele, Inc. reserves the right to request additional documentation from its suppliers regarding the origin of any TSCA Restrictions (PBT) standards materials included in any products sold to Kele, Inc.
  - Suppliers who do not reasonably comply with this Policy shall be reviewed by Kele, Inc.'s supply chain organization for future business.
  - In the event Kele, Inc. determines that a supplier's efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Kele, Inc. reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.
  - Additionally, nothing in this Policy is intended to in any way grant any additional rights or expectations to a Kele, Inc. supplier or in any way modify or otherwise limit in any way any of Kele, Inc.'s contractual or legal rights.
- **Customer Requests Obligations:**
  - Kele, Inc. has this standardized policy and will provide it upon request to our customers.
  - If a Kele, Inc. customer should require additional information not covered by this policy, or information provided by our employees; the customer must submit the following:
    - A complete parts list of items that have been purchased from Kele, Inc. for which you require information. This list will must have Kele, Inc. part numbers.
    - A contact for all communications and information.
    - Specific details for the "additional information" requested.\*
    - Kele, Inc. will be given 90 days to return requested information unless otherwise agreed upon by Kele, Inc. TSCA Restrictions (PBT) administrator and customer.

\*Kele, Inc. does not guarantee that all “additional information” requests will be fulfilled or completed.

In conclusion, while Kele, Inc., as a down-stream distributor, is not completely able to certify as to whether the products manufactured by its suppliers contain any TSCA Restrictions (PBT) categorized substances, Kele, Inc. represents that, to the best of its knowledge, the products Kele, Inc. distributes are in compliance with TSCA Restrictions (PBT) policies. Kele, Inc. fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work toward compliance with TSCA Restrictions (PBT). We encourage all of our suppliers to likewise support these efforts.

Should you require further information, Kele will be glad to put you in contact with its vendors so you can direct your questions to them.

Sincerely,  
Danny Lyons  
Chief Financial Officer