



## California Transparency in Supply Chains Act of 2010

The following disclosures are made pursuant to and in accordance with California Transparency in Supply Chains Act of 2010 (CA SB 657):

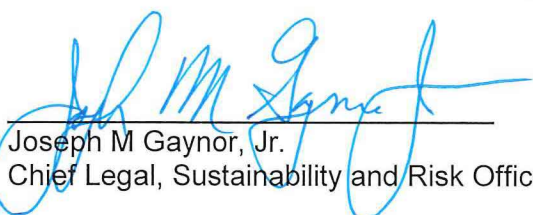
*Birla Carbon engages suppliers who share our values and are committed to (i) conducting business ethically and in accordance with all applicable laws; (ii) adhering to standards of safety and care for the protection of employees, the public, and the environment; and (iii) promote these policies through education, supervision and regular reviews. Birla Carbon does not tolerate violation of laws; including employment of child labor, slavery or human trafficking. Employees who believe they have been subjected to or observed discrimination, harassment or illegal activity should promptly report the conduct to their manager or by calling Birla Carbon's Ethics and Compliance Hotline so an investigation may be promptly initiated and pursued. Verification of supply chains are handled internally unless circumstances necessitate otherwise.*

*Birla Carbon's standard terms and conditions of purchase require all suppliers to abide by applicable laws and regulations; including without limitation, laws against child labor, slavery and human trafficking. Any violation of such laws results in a material breach of our terms and conditions. Suppliers are evaluated on their industry expertise, customer focus and reputation. These criteria are continually assessed by procurement upon each contract renewal and issuance of purchase orders. Birla Carbon does not conduct routine formal internal or external supplier audits.*

*Birla Carbon's written supply agreements include supplier representations and warranties that the supplier complies with and abides by all applicable laws and regulations; which includes without limitation, laws relating to child labor, slavery and human trafficking. Similarly, Birla Carbon's standard terms and conditions of purchase include supplier representations and warranties that the supplier complies with and abides by all applicable laws and regulations; which include without limitation, laws relating to child labor, slavery and human trafficking. Birla Carbon does not require a separate certification.*

*Birla Carbon's Code of Global Business Ethics and Compliance Standards sets forth the values and principles that guide its employees worldwide. The Code of Global Business Ethics and Compliance Standards establishes the minimum standards of behavior and conduct in key areas.*

*The Code of Global Business Ethics and Compliance Standards is provided to all employees globally. Employees are asked to acknowledge that they have received and read the Code of Global Business and Ethics and Compliance Standards. Annual training is conducted through e-tools and is completed by all employees. It focuses on the key aspects of the Code and addresses all business functions.*

  
\_\_\_\_\_  
Joseph M. Gaynor, Jr.  
Chief Legal, Sustainability and Risk Officer

Date: June 15, 2017