



Transparency in Supply Chains Act Disclosure

The following disclosure is made pursuant to the California Transparency in Supply Chains Act (SB 657), which requires retailers and manufacturers to disclose their efforts, if any, to ensure that their supply chains are free from slavery and human trafficking.

Founded in 1927, Milbank is third-generation family-owned business that prides itself on respecting its employees, the members of our supply chain, and the communities in which we do business.

Milbank is proud that over 90% of our suppliers are based in North America. The small portion of our suppliers based outside of North America are located in areas with laws that prohibit slavery and trafficking. Additionally, we annually review the list of regions and goods that the United States Department of Labor has identified as being vulnerable to forced labor; we believe that believe that none of our goods or supplier locations have been identified as being high-risk.

Milbank expects everyone in our supply chain to uphold our commitment to respecting and protecting human rights. Each of our suppliers are required to comply with all applicable laws and regulations, including those that prohibit the use of child, forced, trafficked, prison, bonded, and indentured labor, as well as forced overtime. Although Milbank does not use formal verification procedures or conduct audits targeted at identifying risks of forced labor, we do not tolerate the use of slavery or human trafficking, and reserve the right to immediately terminate relations with any supplier that we learn is engaged in these practices.

As a participant in the U.S. Bureau of Customs and Border Protection's Customs-Trade Partnership Against Terrorism ("C-TPAT") program, we require our suppliers to review their supply chain security procedures, conduct annual security audits, and take necessary corrective actions. Milbank maintains the right to cease relations with any supplier that fails to satisfy these requirements.

All Milbank employees are required to uphold our ethical and legal standards. Our company-wide Code of Conduct requires all employees to comply with all applicable laws and regulations, including those prohibiting forced labor or trafficking. Although Milbank does not use training programs specifically targeted at forced labor or trafficking, employees who work with our supply chain are required to know the Code of Conduct and are encouraged to report any possible violations. Milbank takes Code violations very seriously: individuals who violate the Code are subject to disciplinary action, up to and including termination.