

Abaco Systems

California Transparency in Supply Chains Act Disclosure

Abaco Systems, Inc. and its subsidiaries (“Abaco”) strives to ensure that the highest ethical standards are reached at all times. As part of this ongoing commitment, Abaco will not tolerate any instances of human trafficking or other forced labor, either in its own operations or in its supply chain. It will never conduct business with anyone who engages in any form of human trafficking or forced labor.

This commitment is set forth in Abaco’s integrity and compliance policies, which employees, suppliers and contractors are required to follow.

As part of its commitment, Abaco:

- Requires all employees to comply with the principles and requirements of its Code of Conduct and Business Ethics policy, including its policy against any use of or toleration of any form of human trafficking or forced labor;
- Flows the principles and requirements of its Integrity Guide for Suppliers and Contractors to its supplier and contractors, including its policy against any use of or toleration of any form of human trafficking or forced labor;
- Recognizes the importance of maintaining constant vigilance to identify and address any impacts associated with human trafficking or forced labor throughout its supply chains, including enhanced monitoring of suppliers designated higher risk due to, for example, the nature of their activity and/or their territorial location;
- Provides training on its integrity and compliance policies, including its policy against any use or toleration of any form of human trafficking or forced labor;
- Maintains a system for reporting integrity and compliance concerns, including anonymously, which is available to Abaco employees, and others, at www.abaco.com/raising-concern

Any concerns relating to potential non-compliance with Abaco’s integrity and compliance policies are investigated promptly. Employees, suppliers or contractors who violate Abaco’s integrity and compliance policies are subject to discipline, including termination.