

## **CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE**

The California Transparency in Supply Chains Act of 2010 took effect January 1, 2012 and requires qualifying retailers and manufacturers doing business in the state of California to disclose their efforts to ensure that their supply chain are free from human trafficking and slavery in all forms. The Eastern Company and its Subsidiaries (the Company) throughout the world support these efforts.

The Eastern Company and its Subsidiaries operate globally with operations throughout the world that import and export a variety of goods and services. It is the policy of the Company to observe and comply with all laws applicable to the Company wherever our businesses are located, including, while not referenced directly by name, anti-slavery and human trafficking laws. This policy is stated within our Code of Business Conduct and Ethics (Code). All of our employees, officers and directors are asked to adhere to the policy and report any violation of this policy or other illegal or unethical behavior.

The Code requires our employees to be encouraged to report all violations promptly to higher levels of management. We also have systems in place for the submitting of anonymous reports of any violations or illegal acts. It is a violation of the Code for management to intimidate or impose any form of retribution on any covered party who in good faith reports suspected violations.

Currently, we do not: (1) engage in verification of product supply chains to evaluate or address risks of human trafficking and slavery; (2) conduct audits of suppliers to evaluate supplier compliance with anti-slavery and human trafficking standards; (3) require our suppliers to certify that they comply with anti-slavery and human trafficking laws in the country or countries in which they do business; (4) other than as set forth in our Code, maintain internal accountability standards and procedures for employees or contractors for failing to meet anti-slavery and human trafficking standards; or (5) provide company employees or management who have direct responsibility for supply chain management with training on anti-slavery and human trafficking laws.