

**Dunn-Edwards Corporation**  
**Policy Statement for**  
**CA Transparency in Supply Chains Act of 2010**

It is the policy of the Dunn-Edwards Corporation to make reasonable efforts to ensure that our supply chain is free of any products of forced labor, child labor, human trafficking and slavery. To that end, the Dunn-Edwards Corporation has undertaken the following:

- (1) The Dunn-Edwards Corporation has investigated and evaluated the potential for products of forced labor, child labor, human trafficking and slavery to be present in its direct supply chain. We find that the raw materials used in the manufacture of architectural coatings are not known to be associated with any inhumane labor practices. It should be noted that architectural coating raw materials are not among the products listed in U.S. Department of Labor's 2009 *Report on the List of Goods Produced by Child Labor or Forced Labor*. Further, the American Coatings Association, the principal trade association for the U.S. paint and coatings industry, is not aware of any documented instances of these labor practices in the industry or its supply chain. With respect to the sundry items sold but not manufactured by the Dunn-Edwards Corporation, we find no indication that our direct suppliers engage in any inhumane labor practices.
- (2) If, at any time, the Dunn-Edwards Corporation should become aware of any credible indication of potential inhumane labor practices on the part of a direct supplier, the Dunn-Edwards Corporation will arrange to conduct an independent, unannounced audit of that supplier to the extent practicable.
- (3) The Dunn-Edwards Corporation has begun to require its direct suppliers to certify in writing that materials incorporated into their products comply with the laws regarding forced labor, child labor, human trafficking and slavery in the country or countries where they do business.
- (4) The Dunn-Edwards Corporation maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding avoidance of forced labor, child labor, human trafficking and slavery.
- (5) The Dunn-Edwards Corporation provides company employees and management, who have direct responsibility for supply chain management, training on forced labor, child labor, human trafficking and slavery, particularly with respect to mitigating risks within the supply chain of products.