



**IMPCO Technologies, Inc. California Transparency in Supply Chains Act (SB 657)
Disclosure Statement**

Verification:

IMPCO performs geographic evaluations of its supply chain to assess non-compliance risks in human trafficking and slavery. This analysis is conducted by IMPCO staff directly, not by a third-party.

Auditing:

IMPCO will not tolerate the involvement of its suppliers in human trafficking and slavery. We will perform periodic factory inspections (either directly or through a third party) of any suppliers whom we have deemed a potential risk and will quickly investigate any reports alleging human trafficking and slavery in our supply chain. We will take immediate action against any supplier found to be in violation of the laws regarding human trafficking and slavery.

Certification:

We require our suppliers to certify that all materials incorporated into products supplied to IMPCO comply with the laws regarding slavery and human trafficking of the country or countries in which the supplier is doing business.

Internal Accountability:

We require all IMPCO employees to comply with our business ethics and conflict of interest policy, as well as our non-harassment and anti-discrimination policies, as outlined in the Code of Conduct. Suppliers, contractors and service providers are also expected to act ethically and abide by our Purchase Order Terms & Conditions. All alleged violations of company policy will be investigated and IMPCO will take the appropriate action up to and including termination of employees and termination of agreements with suppliers and contractors.

Training:

Beginning January 1, 2012, IMPCO will provide training on laws regarding slavery and human trafficking to employees whose job functions include procurement, including teaching those employees how to identify and respond to supply chain issues, such as forced labor or child labor.