



Slavery and Human Trafficking Disclosure

As a manufacturer doing business in California with worldwide gross receipts that exceed \$100 million, Altra Industrial Motion, Corp. (collectively with its subsidiaries and affiliates “Altra”) is subject to the California Transparency in Supply Chains Act of 2010 (Cal. Civ. Code § 1714.43) (the “Act”). The Act requires Altra to disclose its efforts to eradicate slavery and human trafficking from its direct supply chains for tangible goods offered for sale.

- **Verification.** Altra has adopted a Code of Business Conduct and Ethics (the “Code”) that includes a commitment to adherence to all applicable laws and regulations. Altra conducts internal audits, including periodic reviews of the activities of its purchasing group, and verification that the purchasing group adheres to the Code.
- **Audit.** Altra does not currently conduct audits of suppliers to evaluate supplier compliance with company standards against human trafficking and slavery. Altra will not tolerate the involvement of its suppliers in human trafficking and slavery. It will quickly investigate any reports alleging human trafficking and slavery in the supply chain, and will take swift and decisive action against any supplier that is found to act improperly in this regard. Altra has implemented or will implement procedures to help assure compliance by suppliers with Altra’s values and purchasing guidelines.
- **Compliance.** Altra requires, in its terms and conditions of sale, that its suppliers and their products comply with all applicable laws and regulations. Although not specifically stated, Altra intends that this general compliance requirement extend to laws regarding slavery and human trafficking of the country or countries in which its suppliers are doing business. In addition, Altra is evaluating whether to require suppliers to specifically certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
- **Internal Accountability.** Upon hire, Altra requires all employees to certify that they have read, understand and are in compliance with the Code. The Code, among other things, requires all employees to comply with all applicable laws and regulations. Human trafficking and slavery is a violation of such laws, and would constitute a violation of the Code. Such a violation would be subject to disciplinary action, and may result in termination of service.
- **Training.** Altra’s management team conducts training on the Code on a regular basis. Altra takes every effort to ensure that all of its employees, including those with direct responsibility for supply chain management, understand their obligations to comply with all applicable laws and regulations.

Altra is committed to treating all people with integrity and respect, and recognizes the importance of assuring that its suppliers engage in appropriate behavior. To that end, Altra is committed to expand its standards and take appropriate measures in an effort to eradicate slavery and human trafficking in its supply chain. This will include strengthening and making more explicit Altra's workplace standards and policies for its suppliers.