



## Country of Origin Policy

Kele distributes over 150,000 products from over 300 vendors, both Branded and Private labeled. As a privately held company many levels removed from the supply chain origin for these products, Kele is not subject to the complete rules or reporting requirements of Country of Origin. However, Kele is committed to providing the most accurate information available and to working with its customers to supply products that meet the customer's specifications.

In addition, information about the products on kele.com is also provided by the manufacturers and/or suppliers. While the goal is to provide accurate information, product packaging and material may contain more and/or different information than that provided online, including the product description, country of origin, specifications, and other information. Always read labels, warnings, directions, and other information provided with the product before using the product.

In furtherance of these commitments, Kele sets forth the following policy:

### Policy:

- Kele supports the aims and objectives of providing the Country of Origin for products.
- Kele will make available this policy upon any request from our supply partners or customers.
- Kele expects that all of its current and future manufacturing and supply partners will provide this information. This will include the following:
  - **Supplier Requirements:**
    - **All Suppliers to Kele, Inc. shall provide the Country of Origin for their parts.**
    - Suppliers shall develop Country of Origin policies, due diligence frameworks, and management systems that are designed to provide information as requested by Kele, Inc. and its customer for the products sold to Kele, Inc.
    - Implement and communicate to their personnel and suppliers policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same.
    - Maintain reviewable business records for their parts as it pertains to Country of Origin; and At Kele, Inc.'s request, provide Kele, Inc. with this information. As such, Kele, Inc. shall be entitled to use or disclose this information to satisfy any legal or regulatory requirements, customer requests, or any marketing communications, notwithstanding the terms

of any confidentiality agreements that do not specifically reference this paragraph.

- **Consequences for Supplier Non-compliance:**
    - Kele, Inc. evaluates its relationships with its suppliers on an ongoing basis.
    - Kele, Inc. reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.
    - Suppliers who do not reasonably comply with this Policy shall be reviewed by Kele, Inc.'s supply chain organization for future business.
    - In the event Kele, Inc. determines that a supplier's efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Kele, Inc. reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.
    - Additionally, nothing in this Policy is intended to in any way grant any additional rights or expectations to a Kele, Inc. supplier or in any way modify or otherwise limit in any way any of Kele, Inc.'s contractual or legal rights.
  - **Customer Requests Obligations:**
    - Kele, Inc. has this standardized policy and will provide it upon request to our customers.
    - If a Kele, Inc. customer should require additional information not covered by this policy, or information provided by our employees; the customer must submit the following:
      - A complete parts list of items that have been purchased from Kele, Inc. for which you require information. This list will must have Kele, Inc. part numbers.
      - A contact for all communications and information.
      - Specific details for the "additional information" requested.\*
      - Kele, Inc. will be given 90 days to return requested information.
- \*Kele, Inc. does not guarantee that all "additional information" requests will be fulfilled or completed.

In conclusion, while Kele, Inc., as a down-stream distributor, is not completely able to certify whether the products manufactured by its suppliers are qualified to meet certain buying requirements that pertain to Country of Origin. Kele, Inc. fully understands the importance of to its customers and is committed to supply chain initiatives to provide the most accurate information for our represented products. We encourage all our suppliers to likewise support these efforts.

Sincerely,  
Danny Lyons  
CEO