

California Transparency in Supply Chains Act

In accordance with the California Transparency in Supply Chains Act of 2010, manufacturers are required to provide consumers with information regarding our efforts to eradicate slavery and human trafficking from their supply chains. Below is our such statement.

Transparency in Supply Chains Act Statement

We, Twisted Engineering, LLC (“Twisted Engineering,” “we,” or “us”), are a part of the industry that can educate consumers on how to purchase goods produced by companies that responsibly manage their supply chains. Twisted Engineering is committed to ensuring ethical and fair-labor practices within our own operations and we seek and expect our suppliers and product partners to do the same.

The structure of our organization, business, and supply chains

Twisted Engineering is an artisan manufacturing and retail fulfillment company with a small team of people operating from a single location in the US. We also contract a wide variety of various suppliers primarily located in the US, but in some cases also include the EU and other countries and regions, to provide us with the highest quality materials for our production.

Our policies in relation to forced labor and human trafficking

Twisted Engineering is committed to doing our part to help bring about an end to human trafficking, child labor, and forced labor. In honor of this commitment, we pledge never source any materials from Countries or Company which supports, either directly or indirectly (allowance through inaction or non-enforcement), these barbaric practices.

Furthermore, whenever we collaborate with a new supplier or product partner, we require they formally acknowledge and agree to abide by our standards for human equality. Thus declaring that neither they, nor any of their suppliers or subcontractors participate in, or utilize any form of child of forced labor, and that they will comply with all applicable laws that prohibit human trafficking.

Twisted Engineering is also working to draft a Supplier Code of Conduct that intends to set forth our standards and expectations with respect to key areas of corporate responsibility, including outlining our requirements for our suppliers not to support child of forced labor and not to collaborate with organizations that use illegal employment practices.

Due diligence processes

Although Twisted Engineering does not currently provide specialized training on child of forced labor and human trafficking to its staff working with supply chains, we require that all employees engaged in the sourcing process comply with our policies which prohibit child of forced labor and human trafficking within our supply chain. Within our own internal operations, a part of our initiative to mitigate the risks for child of forced labor and human trafficking is the implementation of internal policies which include Whistleblower, Anti-bribery, and Health and Safety policies.

Twisted Engineering utilizes the [list of goods produced by child or forced labor](#) and their source countries, published and maintained by the Bureau of International Labor Affairs (ILAB), as a useful tool to help identify and avoid ethical conflicts while vetting potential suppliers and product partners.

Future plans

Currently, Twisted Engineering does not conduct independent audits or unannounced inspections to our direct suppliers. Nonetheless, we plan to establish such protocols to be implemented in the future.



Chief Executive Officer

This Policy shall be governed and interpreted in accordance with the English language, regardless of any translations made for any purpose whatsoever.

The version of this Policy is effective January 25, 2021.