



California Transparency in Supply Chains Act Disclosure

As a manufacturer doing business in California with worldwide gross receipts that exceed \$100 million, Horizon Global Corporation (collectively with its subsidiaries “Horizon”) complies with the California Transparency in Supply Chains Act of 2010 (the “Act”). Horizon recognizes the importance of assuring that our suppliers engage in appropriate behavior and comply with the laws that apply to them. Below is a description of Horizon’s plans and efforts to eradicate slavery and human trafficking from its direct supply chains.

Verification. Horizon implemented the Supplier Compliance Acknowledgement (“Policy”), which requires suppliers to comply with applicable laws relating to human trafficking and slavery, including laws related to labor, working hours, wages, and health and safety. Horizon will request its suppliers to verify their commitment to compliance with this Policy. Horizon will require its foreign suppliers to complete disclosure materials administered by TRACE International (or another third party selected by Horizon) certifying compliance with international laws, including the Act.

Audit. Horizon will undertake an assessment of compliance with its Policy and the Act as part of its operational audits (onsite or otherwise) for a percentage of its foreign suppliers each year. Select Horizon suppliers are independently audited by a third party. Horizon Corporate Audit or its designee will review the verification process and the foreign supplier audits to assess compliance with the Policy and Horizon’s related procedures.

Compliance. Horizon will require suppliers to certify compliance with the Policy, which states that the supplier complies with all applicable laws related to human trafficking and slavery where they do business. Horizon’s The Spirit and The Letter also requires employees and agents who act on our behalf to comply with all laws and regulations where we do business.

Accountability. In the event a supplier fails to execute the Policy, fails to complete the disclosure process through Trace International (or as otherwise designated by Horizon), or fails an audit, Horizon reserves the right to place the supplier on probation until the deficiency is resolved. If the deficiency is not resolved to Horizon’s satisfaction, Horizon reserves the right to replace the supplier. As to any new supplier, Horizon will require: (i) supplier’s execution of the Policy, (ii) certification of foreign suppliers through TRACE International (or as otherwise designated by Horizon), and (iii) agreement to ongoing audits as determined by Horizon.

Training. Horizon will train relevant procurement employees and management (and others as necessary) to facilitate their administration of supplier compliance with the Policy and the applicable laws prohibiting human trafficking and slavery.