

CALIFORNIA SUPPLY CHAIN ACT

The California Transparency in Supply Chain Act of 2010 was designed to increase the amount of information made available by manufacturers and retail sellers regarding efforts to address the issue of slavery and human trafficking in their direct supply chain thereby allowing consumers to make more informed choices regarding the products they purchase and the companies they choose to support through their purchases.

This disclosure identifies the steps ZELTIQ® Aesthetics, Inc. ("ZELTIQ") takes to eradicate slavery and human trafficking in its direct supply chain. As a manufacturer of medical devices, ZELTIQ is committed to the goals of this legislation and ensuring that the materials it uses in its CoolSculpting® products are sourced from socially responsible suppliers. Most of ZELTIQ's manufacturing is done domestically and these operations are subject to and compliant with federal, state, and local labor laws. Additionally, most of the members of ZELTIQ's direct supply chain are based in the United States.

Supplier Verification

Key members of various departments sit on ZELTIQ's Disclosure Committee. The Disclosure Committee meets quarterly to discuss potential risks and disclosures, which may include those risks related to suppliers, slavery and human trafficking. The members of the Disclosure Committee, in turn, relay the information collected to others within their respective departments to solicit additional relevant information. ZELTIQ does not specifically verify its direct supply chain to evaluate risks of slavery and human trafficking.

Supplier Audits

ZELTIQ is subject to regulation by the United States Food and Drug Administration and, as part of its quality system, ZELTIQ is required to regularly audit its main suppliers. ZELTIQ performs audits of its main suppliers annually and/or biennially to ensure the supplier's compliance with ZELTIQ's quality system. Although these audits are not specific to slavery and human trafficking, ZELTIQ visits these suppliers' locations and is able to inspect the supplier on a holistic basis.

Supplier Certification

ZELTIQ expects all of its direct suppliers to abide by all governing laws, including, but not limited to, local, state, federal, national, and international laws and regulations, as well as ZELTIQ's company policies. At this time, ZELTIQ does not specifically require its suppliers to certify that the materials incorporated into the products they supply to ZELTIQ comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. If ZELTIQ is alerted to potential issues with its direct supply chain, it will take appropriate actions.

Internal Accountability

ZELTIQ is committed to its own full compliance with the laws and regulations of the cities, states, and countries in which it operates. ZELTIQ's Corporate Code of Business Conduct requires that each employee in the United States and internationally comply with all applicable laws and regulations, which would include those governing compliance with slavery and human trafficking. All employees are expected to report any suspected violation of the Code of Business Conduct. To that end, ZELTIQ has established a Whistleblower Hotline. Customers, employees, or other interested parties are able to use the Whistleblower Hotline to provide anonymous information about ZELTIQ and members of its direct supply chain, including grievances or other information related to slavery and human trafficking in its direct supply chain. ZELTIQ investigates potential violations and takes remedial and/or disciplinary steps as appropriate.

Training

All of ZELTIQ's employees are trained on all of its policies and procedures, including its Corporate Code of Business Conduct. ZELTIQ is committed to working with members of its direct supply chain and its employees to meet ZELTIQ's high standards for business ethics, integrity and values, and respect for human rights.

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