

California Transparency in Supply Chains Act



The State of California Transparency in Supply Chains Act of 2010 (the Act) requires that manufacturers and retailers disclose their efforts to eradicate slavery and human trafficking from the supply chain.

The following describes JCM efforts (the numbered topics are taken directly from the Act):

1. Engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.
 - a. JCM conducts on-site visits to verify that suppliers are meeting company standards. JCM does not conduct third-party verification of its supply chain.
2. Conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.
 - a. JCM conducts audits of suppliers to evaluate supplier compliance with company standards. JCM does not conduct independent, unannounced audits.
3. Require direct suppliers to certify that materials incorporated into the product comply with the laws regarding trafficking and slavery of the country or countries in which they are doing business.
 - a. JCM requires suppliers to certify that materials incorporated into the product comply with the laws regarding trafficking and slavery of the country or countries in which they are doing business.
4. Maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
 - a. JCM maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
 - b. JCM does not use child or forced labor in any of our global operations or facilities, and we require suppliers or contractors to uphold the same standards.
5. Provide company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.
 - a. JCM provides company employees and management, who have direct responsibility for supply chain management, training on internal accountability standards and procedures regarding human trafficking and slavery.

JCM will not conduct business with suppliers employing child, prison, indentured or bonded labor, or using corporal punishment or other forms of mental and physical coercion as a form of discipline.