



Consolidated
Container
Company

The California Transparency in Supply Chains Act of 2010

Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) will require large manufacturers and retailers that sell goods in California to make certain disclosures regarding their efforts to address slavery and human trafficking. The Act is intended to ensure that retail manufacturers and sellers are thinking about their efforts to eradicate slavery and human trafficking from their supply chains.

CCC is committed to observing high ethical standards in the conduct of its business. We are committed to establishing and maintaining relationships with third parties, including suppliers, that are committed to the same ethical standards, and that are not linked to activities that would be considered abusive or exploitive, including human trafficking and slavery.

CCC supports our internal corporate values by providing a verification form to each of our primary suppliers to ensure that they are equally committed to maintaining similarly high standards. We require our primary suppliers to certify that they are in compliance with the laws and regulations regarding human trafficking and slavery in countries where they operate, but this does not include materials they incorporate into their products. We do not currently retain a third party auditor or conduct unannounced audits. CCC has a qualification process to determine whether new primary suppliers meet our performance and ethical standards, which may include a trial evaluation period. Primary suppliers who are found to be falling short of our standards will be required to implement a corrective action plan within 30 days, which if not implemented, will lead to termination of the relationship.

CCC is committed, among other things, to ensuring workers are treated with respect and dignity, that working conditions in CCC's primary supply chain are safe and that manufacturing processes are environmentally responsible.

We provide training to all company employees and management, who have direct responsibility for supply chain management on issues that include, but are not limited to, human trafficking and slavery and mitigating the risk of its supply chain being impacted by the same. We require all employees to be in compliance with our Code of Business Conduct and require them to affirmatively read and acknowledge in writing that they have read and are in compliance with its provisions.