

JCM AMERICAN CORPORATION
California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 requires retailers and manufacturers doing business in California to disclose efforts to eradicate slavery and human trafficking from its direct supply chain. JCM American Corporation (“JCM”) expects its employees, contractors, and suppliers to comply with all applicable laws and regulations. JCM is committed to ensuring that its employees, contractors, and suppliers take appropriate steps to mitigate the risk of human trafficking and slavery from occurring in any aspects of its supply chain. Accordingly, JCM makes the following disclosures:

- **Verification:** JCM expects its suppliers to comply with applicable laws and regulations, and JCM conducts on-site visits to verify that suppliers are meeting company standards. JCM does not currently conduct third party verification of its supply chain.
- **Audits:** JCM does not currently conduct audits of suppliers to evaluate supplier compliance with company standards specifically for human trafficking and slavery in supply chains.
- **Certification:** JCM expects its suppliers to comply with applicable laws and regulations, but JCM does not require suppliers to certify that materials incorporated into the product comply with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.
- **Internal Accountability:** JCM maintains internal accountability standards and procedures for employees or contractors failing to meet company standards and legal requirements, including those regarding human trafficking and slavery.
- **Training:** 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.