

California Transparency in Supply Chain Act

Jamco's Code of Basic Working Conditions and Human Rights

Basic Working Conditions and Human Rights in Jamco's Supply Chain take the following actions to reduce the risk of human trafficking and slavery in Jamco's supply chain:

1) Verification

Jamco engages in verification by evaluating the risk of human trafficking and slavery in Jamco's direct (first tier) supply chain as described herein. Verification is conducted by Jamco, not by a third party.

2) Audit

Jamco does not conduct audits of suppliers to evaluate their compliance with company standards for trafficking and slavery in supply chains. Jamco also does not verify through independent, unannounced audit.

3) Certification

Jamco does not require its suppliers to certify that the materials incorporated into the products they deliver to Jamco comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. However, Jamco includes a Compliance with Law clause in its subcontracts with its direct suppliers requiring supplier compliance with applicable statutes and government rules, regulations, and others, which necessarily include compliance with applicable laws or regulations pertaining to human rights and eradicating human trafficking and slavery.

4) Internal Accountability

Jamco maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking. Jamco believes that the employment relationship should be voluntary, and the terms of employment must comply with applicable laws and regulations. We are therefore opposed to slavery, human trafficking, forced labor and child labor and are committed to complying with applicable laws prohibiting such exploitation.

5) Training

Jamco does not provide human trafficking and slavery training of 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.