

The State of California's Transparency in Supply Chains Act

The Act requires covered retail sellers and manufacturers to post disclosures-applicable to five specific categories – about their efforts to eradicate slavery and human trafficking from their product supply chains. (Cal. Civ. Code, § 1714.43.) As to each, the entity must at a minimum “disclose to what extent, if any,” it does the following:

1. **Verification.** Engages 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.

CKS Packaging has not evaluated or addressed the risks of human trafficking and slavery in its supply chain either through a third party or through its own investigation.

2. **Audits.** Conducts 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.

CKS Packaging has not conducted an audit of its suppliers to evaluate supplier compliance for human trafficking and slavery in its supply chain either through a third party audit or through an independent, unannounced audit.

3. **Certifications.** Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

CKS Packaging cannot certify that materials incorporated into its product are provided through suppliers that comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

4. **Accountability.** Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.

CKS Packaging does not maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking.

5. **Training.** Provides 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.

CKS Packaging does not 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.