

Boscov's California Transparency in Supply Chains Act (Civil Code § 1714.43) Statement Boscov's

Department Store, LLC expects all of its suppliers to comply with the applicable laws and regulations of the United States and those of the respective country of manufacture and exportation. Per the California Transparency Supply Chain Act (2012), below you will find disclosure of the efforts Boscov's is taking to eradicate slavery and human trafficking from our direct supply chain.

The extent that the company engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery, and if this verification was not conducted by a third-party, that fact must also be stated;

Boscov's Corporate Policy Statement requires that "In selecting suppliers, Boscov's makes every reasonable effort to identify reputable companies that are committed to compliance with legal requirements relevant to the conduct of their business. Boscov's requires of its suppliers strict compliance with all contract provisions, as well as all applicable laws and regulations, including those of the United States and those of the countries of manufacture and exportation. Boscov's will not knowingly allow the importation into the United States of merchandise manufactured with convict labor, forced labor, or indentured labor. Boscov's will not knowingly allow the importation into the United States of merchandise manufactured with illegal child labor." Boscov's may or may not use third parties to conduct verifications.

The extent that the company conducts audits of suppliers to evaluate their compliance with company standards for trafficking and slavery in supply chains, and if this audit was not independent and unannounced, that fact must also be stated;

Boscov's Corporate Policy Statement requires that, "On visits to foreign factories, for any purpose, company associates and buying agents have been asked to be watchful for the apparent use of prison or forced labor, illegal child labor or indications of inaccurate country-of-origin labeling, and to take immediate responsive action when necessary, and to report questionable conduct in these areas to Boscov's buyers for follow-up and, when appropriate, corrective action." Such audits may or may not be independent and may or may not be announced.

The extent that the company requires direct suppliers to certify that materials incorporated into the product comply with the slavery and human trafficking laws of the countries in which they are doing business;

Boscov's Corporate Policy Statement requires that, "Boscov's requires of its suppliers strict compliance with all contract provisions, as well as all applicable laws and regulations, including those of the United States and those of the countries of manufacture and exportation." This includes laws related to slavery and human trafficking in the country in which the direct suppliers are doing business.

The extent that the company maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking; and

Boscov's Corporate Policy Statement requires that, "If it is determined that a foreign factory utilized by a supplier of the manufacture of merchandise of Boscov's is in violation of these foreign sourcing requirements, Boscovs' will take appropriate corrective actions, which may include cancellation of the affected order, prohibiting the supplier's subsequent use of the factory on company orders, current or future, and/or terminating Boscovs' relationship with the supplier."

The extent that the company provides training on slavery and trafficking to employees and management with direct responsibility for supply chain management.

Boscov's Corporate Policy Statement requires that, "Boscov's will continually strive to strengthen its efforts to assure compliance with its compliance policy and its standards of conduct in the following manner: Periodic internal audits of compliance and performance; new employee training and education concerning compliance policy and procedure; continuing education and periodic review of existing employees to stay informed of laws and regulations governing importation into the United States; training and education of new agents, vendors, suppliers and manufacturers concerning the compliance policy and procedures; continuing education and review for companies with which we are currently doing business; and consultation with legal counsel, expert advisors, federal agency officials, and other parties concerning all applicable laws and regulations. "

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