



Guideline	Reference :	GU 01
<b><i>CALIFORNIA TRANSPARENCY WEBSITE DISCLOSURE</i></b>	Department of :	SUPPLIERS
	Revised on : 06/22/15	By : V.P. of Marketing.
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At CG ROXANE, our corporate mission is to operate and maintain high ethical standards and practices. We expect our Vendors and contractors to conduct their business with the same high standards anywhere in the world.

The *State of California Transparency in Supply Chains Act of 2010* (“the Act”) promotes such standards by pursuing the eradication of slavery and human trafficking from the supply chain. We genuinely care about the conditions under which our Vendors’ products are manufactured. It is important to CG ROXANE that materials and services used to manufacturer our Vendors’ products, as well as our own, are obtained through ethical and lawful labor conditions.

To that end, CG ROXANE has established a [Global Labor Policy](#) (“GLP”) to ensure that Vendors comply with all applicable international and domestic labor laws, including those which prohibit the use of unlawful child labor, forced labor, slavery, human trafficking, harassment and abuse, discrimination, restrictions against freedom of association and unsafe working conditions.

The Act requires that certain manufacturers and retailers disclose their efforts in eradicating slavery and human trafficking from the direct product supply chain. The following describes CG ROXANE’s efforts:

1. **VERIFICATION OF PRODUCT SUPPLY CHAINS**: CG ROXANE employs an on-going internal risk assessment program of its Vendors using several parameters, such as known industry risks and risks associated with country origin. As an aid in this risk assessment, we use the U.S. Department of State’s annual *Trafficking in Persons* (TIP) report and the U.S. Department of Labor’s annual *List of Goods Produced by Child Labor and Forced Labor*. When considering new sourcing countries or Vendors, we engage in a strict review and approval process to determine the risk of non-compliance with the GLP.
2. **VENDOR AUDITING**: As a condition of doing business, Vendors are required to allow CG ROXANE staff or independent third-party providers the ability to audit their facilities. These audits are announced beforehand.

As an integral part of our internal risk assessment program, high-risk or critical Vendors are periodically audited. The audits are conducted on-site and involve interviews with workers and management, the review of pertinent factory records and a physical inspection of the facility. After the audit, any violations of our standards are documented, and a detailed root cause analysis and corrective action plan are required from the Vendor. Vendors who have exhibited violations will be placed on a warning list and be subject to follow-up inspections to ensure that violations have been corrected.



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CG ROXANE has a zero tolerance policy against the use of slavery and human trafficking. CG ROXANE expressly reserves the right to terminate Vendors for any non-compliance of the GLP.

3. **VENDOR CERTIFICATION**: Vendors are required to annually certify their compliance with the GLP.
4. **MAINTENANCE OF INTERNAL ACCOUNTABILITY STANDARDS**: We maintain strict internal accountability procedures for our employees, which sets forth the procedures the company will take if an employee or contractor fails to meet standards or the GLP. Any employee or contractor who becomes aware of a Vendor who does not comply with the GLP must report the suspected violation to the Vice President of Manufacturing or **Vice President of Marketing**.

In the event of any Vendor non-compliance, CG ROXANE expressly reserves the right to not purchase products from the Vendor and/or terminate the relationship.

5. **STAFF TRAINING ON IDENTIFYING AND PREVENTING SLAVERY AND HUMAN TRAFFICKING**: CG ROXANE provides training on slavery and human trafficking to our employees who have direct responsibility over supply chain management, including our procurement department. We have strong alignment internally as compliance updates and issues are promptly communicated across various affected departments.

On an annual basis, the **Vice President of Marketing** reviews and updates, as needed, the GLP and internal risk assessment program.