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## Executive Summary

This study shines a spotlight on the first disclosure law addressing human trafficking and slavery within the global marketplace – the California Transparency in Supply Chains Act of 2010 (“CA-TISCA”). CA-TISCA requires human trafficking- and slavery-pertinent disclosure statements from large corporate earners operating in the state.

Disclosure law in international business – requiring more symmetry of information in the marketplace – is a brave new world. Five years after CA-TISCA’s signing on October 18, 2010, and almost four years since CA-TISCA’s disclosure provisions went into effect on January 1, 2012, a first benchmarking study is in order.

We systematically evaluate the degree of corporate disclosure compliance with CA-TISCA by individually assessing qualifying companies’ statements as disclosed against eight (8) compliance criteria based on the law’s core requirements, resulting in a compliance score, and seven (7) indicators regarding affirmative conduct, yielding an affirmative score. In addition, the study collected 19 additional data points of interest.

Scrutinizing all available corporate disclosures provides a first macro perspective not only of the compliance landscape but also the efforts companies are making to confront human trafficking and slavery-like practices.

In total we identified 2,126 potentially qualifying companies, of which 1,325 (62%) had a pertinent statement. As some qualifying companies’ subsidiaries or brands each had a statement, in all we evaluated 1,504 individual disclosures.

This study reveals that, overall, compliance performance greatly varies between companies. The average disclosure compliance score was 60%. Forty-one (41%) percent of companies were found to have a corporate disclosure score on or above the 70% mark. Thus, many affected companies still have a lot of work to do before living up to the letter of the law.

In order to ascertain the extent of corporate-driven action relevant to CA-TISCA, we also assessed the reported degree of affirmative conduct. The average affirmative conduct score of companies with statements was 31%. Fourteen (14%) of companies were found to have an affirmative corporate conduct score on or above the 70% mark. Fifteen (15%) percent of companies also noted that they were still working on one or more CA-TISCA-relevant items.

The average divergence between a company’s disclosure compliance and affirmative conduct scores for must-disclose themes was 27 percentage points.



## Table of Contents

Executive Summary.....	2
Table of Contents.....	3
Figures and Tables .....	5
Acknowledgements.....	6
I. Introduction .....	6
1. <i>Background</i> .....	6
i. <i>CA-TISCA context and precedents</i> .....	6
ii. <i>The California Transparency in Supply Chains Act of 2010</i> .....	9
iii. <i>Subsequent actions</i> .....	9
2. <i>The stated logic behind CA-TISCA</i> .....	11
3. <i>The scope of CA-TISCA</i> .....	13
i. <i>Thematic scope</i> .....	13
ii. <i>Supply chain depth</i> .....	13
4. <i>First lawsuit involving CA-TISCA</i> .....	14
II. Objectives.....	15
III. Methods.....	16
1. <i>Universe of qualifying companies</i> .....	16
2. <i>“Pertinent statement” criteria</i> .....	16
3. <i>Instrument</i> .....	17
4. <i>Evaluator team, orientation and data quality control</i> .....	17
5. <i>Data collection timeframe</i> .....	18
6. <i>Independence of author and competing interests</i> .....	18
IV. Findings.....	18
1. <i>Profile of disclosing companies</i> .....	18
2. <i>Corporate disclosure compliance</i> .....	21
i. <i>Summary of corporate compliance criteria</i> .....	21
ii. <i>Findings of disclosure criteria and indicators</i> .....	22
iii. <i>Disclosure compliance scores</i> .....	33
3. <i>Affirmative corporate conduct</i> .....	35
4. <i>Compliance vs. affirmative conduct</i> .....	39



APPENDICES ..... 42

*Appendix A: Acronyms* ..... 42

*Appendix B: Terminology* ..... 43

*Appendix C: Disclosure evaluation instrument* ..... 45

*Appendix D: Example of incomplete disclosure statement* ..... 47

*Appendix E: Disclosure compliance scores* ..... 48

*Appendix F: Potentially qualifying companies* ..... 97





## Figures and Tables

Figure 1: Annual revenue structure of all companies concerned	19
Figure 2: Type and industry distribution of evaluated companies	20
Figure 3: Country distribution of evaluated companies	20
Figure 4: Presence of conspicuous link to statement on homepage	23
Figure 5: Disclosure link readily accessible	24
Figure 6: Reference to CA-TISCA in statement or website	24
Figure 7: Risk assessment and risk mitigation verification	25
Figure 8: Risk verification performed by 3 <sup>rd</sup> party	25
Figure 9: In-house risk verification	26
Figure 10: Practice of audits	28
Figure 11: Practice of independent and unannounced audits	29
Figure 12: Supplier certification of compliance with pertinent laws	30
Figure 13: Internal accountability standards and procedures	31
Figure 14: URL to company's code of conduct	31
Figure 15: Possible termination of supplier/contractor contracts	32
Figure 16: Training on human trafficking and slavery	33
Figure 17: Aggregated results of 8 compliance-based criteria	34
Figure 18: Corporate disclosure scores, histogram	34
Figure 19: Corporate disclosure scores, percentile rank	35
Figure 20: Aggregated results of 7 affirmative corporate conduct indicators	36
Figure 21: Affirmative corporate conduct scores, histogram	37
Figure 22: Affirmative corporate conduct scores, percentile rank	38
Figure 23: New / recent action related to AHT and/or anti-slavery	39
Figure 24: Promise of new action / forward looking statement	39
Figure 25: Compliance vs. affirmative conduct of manufacturing companies	40
Figure 26: Compliance vs. affirmative conduct bubble chart	41

Table 1: Frequency of verifications	27
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Table 2: Frequency of audits	28
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## I. Introduction

### 1. Background

#### *i. CA-TISCA context and precedents*

The advent of the California Transparency in Supply Chain Act of 2010 (“CA-TISCA”) may be explained as a confluence of evolving disclosure law applications and mounting legislative action demanded by the labor rights movement that over decades has fought to improve working conditions in the face of salient labor issues. This section traces CA-TISCA’s *raison d’être* and intellectual roots, which spans congressional and presidential action, international protocols, all spurred on by the media and civil society.

Persistent systemic labor rights issues continue to plague the global labor landscape. Fourteen (14.2) million people are estimated to be victims of forced labor exploitation, generating an estimated US\$ 51 billion in profits per year.<sup>1</sup> In its sixth edition, the 2014 U.S. Department of Labor’s (DOL) *List of Goods Produced by Child Labor or Forced Labor* identified 136 goods produced by forced labor or child labor in violation of international standards, in 74 countries across the world.<sup>2</sup>

In the U.S., an early congressional measure against forced or indentured labor was the Tariff Act of 1930. Although more infamously known as the Smoot–Hawley Tariff Act, which, *inter alia* precipitated tariff wars and contributed to Germany's descent into autarky and a political environment fertile for national socialism, Section 307 of the act stipulates that “all goods,

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<sup>1</sup> ILO, ILO Global Estimate of Forced Labour: Results and Methodology, International Labour Office, Special Action Programme to Combat Forced Labour, Geneva, 2012, [http://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/publication/wcms\\_182004.pdf](http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_182004.pdf), accessed on August 25, 2015.

<sup>2</sup> USDOL, *List of Goods Produced by Child Labor or Forced Labor*, Bureau of International Labor Affairs, December 1, 2014, [http://www.dol.gov/ilab/reports/pdf/TVPRA\\_Report2014.pdf](http://www.dol.gov/ilab/reports/pdf/TVPRA_Report2014.pdf), accessed on August 25, 2015.



wares, articles and merchandise mined, produced, or manufactured wholly or in part in any foreign country by convict labor or/and forced labor or/and indentured labor under penal sanctions shall not be entitled to entry at any of the ports of the United States, and the importation thereof is hereby prohibited.”<sup>3</sup>

Disclosure law is not new to California. The *Safe Drinking Water and Toxic Enforcement Act of 1986* (aka Proposition 65)<sup>4</sup> requires businesses to notify Californians about significant amounts of chemicals contained in products for sale, in living- or workplaces, or that are released into the environment. By mandating the provision of this information, the act enables Californians to make informed decisions about protecting themselves from exposure to hazardous products or spaces. Proposition 65 was amended by Assembly Bill 227 on October 10, 2013,<sup>5</sup> a consensus bill establishing a violation resolution mechanism and limiting frivolous enforcement actions.<sup>6</sup>

More than 50 years after the Universal Declaration of Human Rights, in 2000 the UN General Assembly adopted a convention<sup>7</sup> and two protocols<sup>8</sup> that established a common vision to define trafficking in persons, to assist victims, and to prevent the practice in the first place. The *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children* (the TIP protocol) notably established an internationally accepted definition of trafficking that shifted criminalization away from victims, and identified exploitation as the key element in the trafficking process rather than the movement across a border.

Affecting U.S. federal contractors or subcontractors, a decisive executive-level step against forced labor was taken with Executive Order 13126 (“Prohibition of Acquisition of Products Produced by Forced or Indentured Child Labor”). Signed by President Clinton on June 12, 1999, this executive order seeks to prevent U.S. federal agencies from procuring goods made by forced or indentured child labor.<sup>9</sup>

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<sup>3</sup> 19 U.S. Code § 1307, The Tariff Act of 1930, Convict-made goods; importation prohibited, June 17, 1930, <https://www.law.cornell.edu/uscode/text/19/1307>, accessed on September 27, 2015.

<sup>4</sup> Office for Environmental Health Hazard Assessment, Proposition 65, <http://www.oehha.ca.gov/prop65/law/P65law72003.html>, accessed on September 27, 2015.

<sup>5</sup> California Legislative information. AB-227 Proposition 65: enforcement. (2013-2014), [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB227](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB227), accessed on October 2, 2015.

<sup>6</sup> Between legitimate claims and so-called “frivolous lawsuits,” in 2012 there were 437 settlements totaling \$22.5 million, according to the California Attorney General. See Proposition 65 Settlement Summary -- 2012, [http://oag.ca.gov/sites/all/files/agweb/pdfs/prop65/Alpert\\_Report2012.pdf?](http://oag.ca.gov/sites/all/files/agweb/pdfs/prop65/Alpert_Report2012.pdf?), accessed on October 2, 2015.

<sup>7</sup> *The Convention Against Transnational Organized Crime*

<sup>8</sup> *The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children* (the TIP protocol), and the *Protocol Against the Smuggling of Migrants by Land, Sea and Air*

<sup>9</sup> Administration of William Jefferson Clinton, Executive Order 13126, Prohibition of Acquisition of Products Produced by Forced or Indentured Child Labor, Federal Register Vol. 64, No. 115, June 12, 1999, <http://www.gpo.gov/fdsys/pkg/FR-1999-06-16/pdf/99-15491.pdf>, accessed on September 27, 2015.





A major legislative milestone was traversed in the U.S. when Congress passed the Victims of Trafficking and Violence Protection Act (TVPA) of 2000.<sup>10</sup> Aside from defining human trafficking, TVPA set up a comprehensive approach to trafficking in persons by creating new criminal offenses, and establishing protection and assistance for victims. TVPA further required the Secretary of State to submit a report to Congress with respect to the status of human trafficking worldwide, including in the United States. A notable feature of the Trafficking in Persons (TIP) reports is that they, pursuant to TVPA, classify countries according to three tiers, the third tier associated with countries which do not fully comply with the law's minimum standards and which are not making significant efforts to bring themselves into compliance. Countries on *Tier 3* may be subject to certain sanctions, whereby the U.S. government may withhold or withdraw non-humanitarian, non-trade-related foreign assistance, even assistance channeled through the International Monetary Fund (IMF) and the World Bank. Since 2000, the U.S. Department of State has published 15 TIP reports, the latest also honing in on human trafficking in the marketplace of jobs.

The Trafficking Victims Protection Reauthorization Act (TVPRA) of 2003<sup>11</sup> and the TVPRA of 2005<sup>12</sup> stipulated that Federal contracts where a contractor or subcontractor engages in severe forms of trafficking in persons or uses forced labor in the performance of the grant, contract, or cooperative agreement be terminated. The William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 built on the previous trafficking acts, notably including a provision that establishes a two-year time limit for countries on *Tier 2 special watch list* before they are re-classified, as well as required DOL to provide a list of goods that it has reason to believe were made with forced labor or child labor. The TVPRA of 2013, among other things, provides resources for services for survivors and imposes reporting and compliance requirements on Federal agencies, including the U.S. Department of Defense (DoD).

Another antecedent legislative development was the passing of the USA PATRIOT Act in 2001, which required institutions to “Know Your Customer” (KYC) and acquire knowledge of their business operations. Its Title III (the International Money Laundering Abatement and Anti-Terrorism Financing Act of 2001) includes requirements that, in order to thwart any possible financial transaction or money laundering activities by terrorists, include: (1) designating a compliance officer; (2) implementing an ongoing training program, (3) adopting an independent

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<sup>10</sup> 106th Congress Public Law 386, Victims of Trafficking and Violence Protection Act of 2000, Oct. 28, 2000, <http://www.state.gov/documents/organization/10492.pdf>, accessed on September 24, 2015.

<sup>11</sup> 108th Congress Public Law 193, Trafficking Victims Protection Reauthorization Act of 2003, U.S. Government Printing Office, <http://www.gpo.gov/fdsys/pkg/PLAW-108publ193/html/PLAW-108publ193.htm>, accessed on September 24, 2015.

<sup>12</sup> 109th Congress Public Law 164, Trafficking Victims Protection Reauthorization Act of 2005, U.S. Government Printing Office, <http://www.gpo.gov/fdsys/pkg/PLAW-109publ164/html/PLAW-109publ164.htm>, accessed on September 24, 2015.





audit function, and (4) developing internal policies, procedures, and controls.<sup>13</sup> Stakeholders will recognize elements of these measures, mandated however only in the form of corporate disclosure, in the legislation spot-lighted in this study.

### ii. The California Transparency in Supply Chains Act of 2010

Targeting the world's biggest companies with a business stake in California, on October 18, 2010, Arnold Schwarzenegger signed Senate Bill 657 – the California Transparency in Supply Chains Act<sup>14</sup> – into Californian law, the corporate compliance therewith the subject of this study. This unprecedented act was the first to apply disclosure law to the issue of trafficking and slavery in commercial supply chains. CA-TISCA requires retail sellers and manufacturers doing business in the state, with annual worldwide gross receipts in excess of US\$ 100 million, to publicly disclose on their website their efforts to eradicate slavery and human trafficking from their direct supply chains. The law went into effect January 1, 2012. As no implementing rules or regulations exists, it is the law itself that companies must interpret and use to guide their compliance.

### iii. Subsequent actions

The media also plays a role in raising awareness, and, in the first place, uncovering unsavory labor practices. The CNN Freedom Project, launched in 2011 to "end modern-day slavery," human trafficking, and related illegal practices, has reported over 400 stories on human trafficking across more than 60 countries. Breaking the news of fishermen slaves in Thailand was the March 2014 Environmental Justice Foundation documentary, "Slavery at Sea: The Continued Plight of Trafficked Migrants in Thailand's Fishing Industry," followed up by the June 2014 The Guardian article "Revealed: Asian slave labour producing prawns for supermarkets in US, UK," as well as the July 2015 The New York Times article "Sea Slaves: The Human Misery That Feeds Pets and Livestock."

In August 2011 Representative Carolyn Maloney (D-N.Y.) introduced a bill in the House of Representatives – the *Business Supply Chain Transparency on Trafficking and Slavery Act of 2014* – that would require all issuers (companies subject to SEC reporting requirements) to disclose in their annual reports what measures were taken to identify and address conditions of

<sup>13</sup> 107th Congress Public Law 56, Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT ACT) Act of 2001, U.S. Government Printing Office, <http://www.gpo.gov/fdsys/pkg/PLAW-107publ56/html/PLAW-107publ56.htm>, accessed on September 24, 2015.

<sup>14</sup> California SB 657 - Transparency in Supply Chains Act of 2010, California Civil Code, § 1714.43, <http://www.state.gov/documents/organization/164934.pdf>, accessed on August 2, 2015.



slavery, human trafficking, forced labor, and child labor within the companies' supply chains.<sup>15</sup> The federal bill would also require companies to disclose whether the company ensured that remediation was provided to victims where violations were identified. As of the 17<sup>th</sup> of November 2014, the Bill was referred for consideration to the Subcommittee on Workforce Protections and remains there as of the date of this study.

In 2012 federal procurement rules were strengthened in line with the U.S. government's zero-tolerance policy regarding human trafficking, affecting all U.S. government contractors and subcontractors. Issued by President Obama, Executive Order 13627<sup>16</sup> and the 2013 National Defense Authorization Act<sup>17</sup> instructed the Federal Acquisition Regulation (FAR) Council and DoD to amend rules. The new FAR Council rule<sup>18</sup> imposes significant responsibility on contractors and subcontractors to act affirmatively to prevent human trafficking and forced labor, and the DoD rule amending the Defense Acquisition Regulations System further implements DoD's anti-trafficking policy and supplements government-wide changes. The FAR Council rule *inter alia* requires federal contractors and subcontractors to implement a human trafficking compliance plan. Simply adopting an awareness program is not enough to mitigate contractor liability for a trafficking violation. A compliance plan may be considered a mitigating factor only if the contractor (a) had the plan in place at the time of the violation; (b) was in compliance with the plan; and (c) took appropriate remedial actions to address the violation, including making reparation to victims.

In March this year the United Kingdom enacted the Modern Slavery Act of 2015, which specifies the offences related to slavery, servitude and forced or compulsory labor and human trafficking, makes provisions for the protection of victims, establishes an Independent Anti-slavery Commissioner, and, taking a page out of CA-TISCA, features a disclosure clause. The UK Modern Slavery Act of 2015 (PART 6) requires "commercial organizations" to issue a slavery and human trafficking statement for each financial year. The act suggests the statement "may"

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<sup>15</sup> Library of Congress, H.R.4842 - Business Supply Chain Transparency on Trafficking and Slavery Act of 2014 113th Congress (2013-2014), <https://www.congress.gov/bill/113th-congress/house-bill/4842>, accessed on September 6, 2015.

<sup>16</sup> Administration of Barack Obama, Executive Order 13627—Strengthening Protections Against Trafficking in Persons in Federal Contracts, Federal Register Volume 77 No. 191, September 25, 2012, <http://www.gpo.gov/fdsys/pkg/FR-2012-10-02/html/2012-24374.htm>, accessed on September 27, 2015.

<sup>17</sup> See Title XVII— Ending Trafficking in Government Contracting, 102th Congress Public Law 239, National Defense Authorization Act for Fiscal Year 2013, H.R. 4310, January 3, 2012, <http://www.gpo.gov/fdsys/pkg/PLAW-112publ239/pdf/PLAW-112publ239.pdf>, accessed on September 27, 2015.

<sup>18</sup> Federal Register (80 FR 4967), Federal Acquisition Regulation; Ending Trafficking in Persons A Rule by the Defense Department, the General Services Administration, and the National Aeronautics and Space Administration on 01/29/2015, <http://www.gpo.gov/fdsys/pkg/FR-2015-01-29/pdf/2015-01524.pdf>, accessed on September 27, 2015.



address six (6) points, *inter alia* detailing the steps the organization has taken to prevent human trafficking in its supply chain, or in any part of its business.<sup>19</sup>

In April 2015, the California Department of Justice began, for the first time, to send letters to companies regarding compliance with CA-TISCA. Parallel to sending out the letters, the California Attorney General published a guide for companies on complying with CA-TISCA – *The California Transparency in Supply Chains Act: A Resource Guide (2015)*.<sup>20</sup> The guide provides advice and model disclosure examples, importantly also the extent to which companies should be specific about whether they engage or do not engage in a relevant activity.

From Matt Friedman’s business-to-business (B2B) mobilization approach<sup>21</sup> to MTV’s grassroots EXIT initiative,<sup>22</sup> current anti-human trafficking (AHT) actions abound. You know AHT is a prominent feature of the Zeitgeist when Avicii themes his latest music video “For A Better Day” with the subject of child trafficking.<sup>23</sup>

We thus observe that while the incidence of present-day trafficking and slavery-like practices are increasing in terms of absolute number of victims, all the same a general awareness of the problem is growing and AHT measures are increasingly being adopted.

## **2. The stated logic behind CA-TISCA**

With the rapid globalization underway in the 21<sup>st</sup> century, parallel to the growth of sophisticated information communication technology (ICT) with which companies manage ever more complex supply chains, consumers also increasingly demand information about the goods they wish to purchase. Not only are consumers concerned with the quality of products, but also increasingly with the labor or environmental conditions under which the good was produced.

Not satisfied with the “legislative efforts to address the market for goods and products tainted by slavery and trafficking,” the State of California affirmed its responsibility in fostering ethical

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<sup>19</sup> Modern Slavery Act 2015, CHAPTER 30, The National Archives, [http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga\\_20150030\\_en.pdf](http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf), accessed on October 5, 2015.

<sup>20</sup> The California Transparency in Supply Chains Act – A Resource Guide. Kamala D. Harris, Attorney General California Department of Justice. 2015. <https://s3.amazonaws.com/knowthechain/resources/resource-guide.pdf>, accessed on October 2, 2015.

<sup>21</sup> Matt Freedman at the Mekong Club offers targeted trainings for business on how to ensure slave-free supply chains use innovative technology to identify slavery and shut it down.

<sup>22</sup> MTV Exit is a behavior change campaign featuring the EXIT Map – a workshop guide to inspire young people to take action and mobilize their communities. See [www.mtvexit.org](http://www.mtvexit.org) for more information.

<sup>23</sup> <http://www.billboard.com/articles/news/dance/6685775/avicii-directs-videos-for-a-better-day-pure-grinding>



consumerism.<sup>24</sup> CA-TISCA states that “the market” is “a key impetus” for slavery and trafficking, and that “consumers and businesses are inadvertently promoting and sanctioning [trafficking and slavery] through the purchase of goods and products that have been tainted in the supply chain.” To this end California is leveraging its position as the largest state economy in the U.S. and indeed the world’s 8<sup>th</sup> largest economy, with a Gross Domestic Product (GDP) of \$2.31 trillion in 2014.<sup>25</sup>

The state’s chosen remediation vehicle was to mandate more symmetry of information on this matter – the condition of symmetry of information is a pillar of perfect market theory – desirable for a competitive and efficient market. CA-TISCA states: “(i) Absent publicly available disclosures, consumers are at a disadvantage in being able to distinguish companies on the merits of their efforts to supply products free from the taint of slavery and trafficking. Consumers are at a disadvantage in being able to force the eradication of slavery and trafficking by way of their purchasing decisions.” In other words, in the absence of pertinent information provided by the company, the State of California stipulates that consumers would be unwitting accomplices to irresponsible and unethical sourcing. Conversely, by enhancing symmetry of information between companies and consumers on this issue, consumers are able to purposefully vote with their dollars.

CA-TISCA further outlines a broader goal: “(j) It is the policy of this state to ensure large retailers and manufacturers provide consumers with information regarding their efforts to eradicate slavery and human trafficking from their supply chains, to educate consumers on how to purchase goods produced by companies that responsibly manage their supply chains, and, thereby, to improve the lives of victims of slavery and human trafficking.” The State thus wagers that if it shifts the burden of information provision to the market actors, and educates the public on being able to distinguish between responsible and irresponsible market actors, desired effects will be achieved. Sunlight, so the saying goes, is the best disinfectant.

In sum, with CA-TISCA the State of California stipulates that its population’s significant purchasing power not only allows it to consume goods, but that the state will also leverage this power for ethical sourcing and thus – by extension – ethical consumerism of products brought to its shores.

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<sup>24</sup> California SB 657 - Transparency in Supply Chains Act of 2010, California Civil Code, § 1714.43, <http://www.state.gov/documents/organization/164934.pdf>, accessed on August 2, 2015.

<sup>25</sup> In current US\$. See: U.S. Bureau of Economic Analysis, Broad Growth Across States in 2014, [http://www.bea.gov/newsreleases/regional/gdp\\_state/2015/pdf/gsp0615.pdf](http://www.bea.gov/newsreleases/regional/gdp_state/2015/pdf/gsp0615.pdf), accessed on October 2, 2015.



### 3. The scope of CA-TISCA

#### i. Thematic scope

While CA-TISCA does not define human trafficking, slavery, or exploitation, and as there are not any implementing rules or regulations that do, a reasonable interpretation of legislative intent would leave one to conclude that any production-specific, human resource-relevant practices related to trafficking and slavery are in-scope.<sup>26</sup> The term “supply-chain” is referenced in CA-TISCA’s title, and it targets “retail sellers and manufacturers of products” with annual worldwide gross receipts exceeding US\$ 100,000,000. It also references DOL’s 2009 *List of Goods Produced by Child Labor or Forced Labor*, which identified 122 goods produced by forced labor or child labor in violation of international standards, in 58 countries across the world.

CA-TISCA further discusses the consumer’s inadvertent promotion and sanction of crimes “through the purchase of goods and products that have been tainted in the supply chain.” Nowhere is trafficking or slavery for the purposes of sexual exploitation or prostitution mentioned. The company is thus to identify production-relevant risks in the context of their industry and operations.

The five (5) must-disclose themes are: **V**erification, **A**udit, **C**ertification, **I**nternal Accountability, and **T**raining, yielding the acronym VACIT. For a more in-depth discussion of the law’s disclosure requirements see section 2. *Corporate disclosure compliance* under IV. *Findings*.

#### ii. Supply chain depth

The Act’s name – the “California Transparency in Supply Chains Act” – broadly refers to supply chains. The term “direct supply chain” is mentioned twice, e.g.: “Every retail seller and manufacturer doing business in this state... shall disclose... its efforts to eradicate slavery and human trafficking from its direct supply chain for tangible goods offered for sale.” Accordingly, the legislative intent seems that affected companies disclose their scope of efforts vis-à-vis their direct supply chains. The scope of the act is therefore a company’s “live,” in-pipeline supply chain operations.

However, with respect to one disclosure requirements as stipulated by CA-TISCA, information related specifically to the *direct suppliers* is required, namely the clause referring to supplier assurance (“(3) 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.”).

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<sup>26</sup> For a discussion of how these terms are operationalized in federal law, see *Appendix B: Terminology*.



#### 4. *First lawsuit involving CA-TISCA*

Although CA-TISCA does not expressly provide for a private right of action (“The exclusive remedy for a violation of this section shall be an action brought by the Attorney General for injunctive relief”), it does state that “[n]othing in this section shall limit remedies available for a violation of any other state or federal law.”<sup>27</sup> Thus, two conflicting messages are sent: either there is one *exclusive* remedy, or all remedies are on the table. As such, the latter provision trumps: if another remedy were to be employed – such as the Unfair Competition Law<sup>28</sup> which makes provisions for a private plaintiff to bring a civil action against any business engaging in unfair, fraudulent or unlawful conduct – the “exclusive remedy” provision in CA-TISCA would have to make way. In other words, while the only remedy available under the law is injunctive relief, the statute doesn't preclude claims brought under other federal or state statutes.

Lawsuits may thus be brought on the basis of claims a company makes about supply chain practices, as, in fact, a newly-filed consumer class action lawsuit demonstrates. Levied against Costco (*Sud v. Costco Wholesale Corp.*), the lawsuit alleges that the wholesaler sold shrimp from Thailand that was farmed by forced labor, and also claims that this fact is inconsistent with the company's disclosure under CA-TISCA. The lawsuit brings claims for unlawful business practices under *California Business and Professions Code* § 17200, et seq., as well as misleading and deceptive advertising claims under *California Business and Professions Code* § 17500, et seq., and additionally unfair and deceptive practices in violation of the *Consumer Legal Remedies Act* codified at Civil Code § 1750, et seq. The claim juxtaposes the defendant's alleged conduct with the company's representations as stated in its CA-TISCA disclosure, in other words placing Costco on trial for the veracity of its disclosure. The outcomes of this lawsuit will no doubt provide answers.

While the *Sud v. Costco* case was filed in California, the State of California does not have sole jurisdiction over a case which refers to disclosures made consistent with CA-TISCA. A pertinent claim can be brought – so long as the consumer can claim that s/he relied on the disclosure – from anywhere in the U.S. As long as the consumer can prove that s/he relied on the statements being made, there is no legal preclusion from a lawsuit being brought in other US jurisdictions. The same is true for disclosures made under the UK Modern Slavery Act.

The combined use of existing business-practice and new disclosure law explores new legal terrain that brings new risks and challenges for qualifying companies to navigate. While CA-TISCA does not require companies take any specific action, they must report their AHT supply chain policies and procedures, or lack thereof. Companies must decide what they want to

<sup>27</sup> California SB 657 - Transparency in Supply Chains Act of 2010, California Civil Code, § 1714.43, <http://www.state.gov/documents/organization/164934.pdf>, accessed on August 2, 2015.

<sup>28</sup> California's Unfair Competition Law, Business & Profession Code Section 17200, et seq. See, e.g., the California Antitrust & Unfair Competition Law (Third), Volume 2: Unfair Competition (State Bar of California, 2003 Daniel Mogin & Danielle S. Fitzpatrick, eds.).





disclose, and must be ready to stand by their statements. Corporate defense firms warn that companies must walk a narrow path regarding the Act. On the one hand, a disclosure statement revealing compliance efforts can be the basis of consumer fraud claims, or used as evidence to support other claims. On the other hand, a company which reports that it takes no action to monitor its supply chain may comply with the Act, and shield itself from potential liability, but stands to face backlash in the court of public opinion. Stakeholders thus need to be mindful that some companies could regard disclosing information under the law as an inherent risk, but face public pressure to “do the right thing.”

A solution? Prudent anti-human trafficking and slavery action at the discretion of the company, conscientious monitoring one’s supply chains, along with carefully worded disclosure statements. Companies can comply with the Act, protect themselves from liability, and stay in consumers’ good graces by providing a thorough, accurate, and current disclosure. A company may best shield itself from reputational risk and potential lawsuits by precisely stating its relevant policies and procedures, be sure that it does what it says it does, and amend its disclosure statement if it changes its practices. Squire Patton Boggs recently advocated just that in a “bootcamp” for companies regarding compliance with the CA-TISCA. They explained that the best way to: (1) protect brand value, (2) reduce the likelihood of high-profile and costly litigation, and (3) provide a response to criticisms about ethical sourcing efforts, was to develop and implement an integrated compliance program to address sourcing and supply chain risks.<sup>29</sup>

## II. Objectives

The objectives of this study are three-fold:

1. First, we set out to compile a near complete list (universe) of qualifying companies;
2. Second, we set out to comprehensively evaluate the extent of corporate compliance with law; and
3. Third, we seek to gauge the extent of affirmative corporate conduct.

As ethical sourcing concerns a business’ viability and sustainability (of great concern to shareholders and civil society), which in turn enables ethical consumerism (of concern to many consumers), by bringing the evidence to bear on compliance with this law at the micro- and macro-levels, this report seeks to encourage a constructive discussion going forward.

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<sup>29</sup> Squire Patton Boggs, 30-Minute Supply Chain Disclosure Risk Boot Camp, <http://www.squirepattonboggs.com/insights/events/2015/09/30-minute-supply-chain-disclosure-risk-boot-camp%20>, accessed on September 20, 2015.





### III. Methods

#### 1. *Universe of qualifying companies*

Professor Jonathan Todres observed, in an op-ed piece, that “Human trafficking is one of the priority issues of our time.” It is however not the case that “What we have now is a disclosure law that is unable to inform the public of what has been disclosed.”<sup>30</sup>

According to the eligibility criteria as set forth in CA-TISCA<sup>31</sup> the California Franchise Tax Board (CFTB) annually compiles a list of qualifying companies. Circa 1,700 retail sellers or manufacturers were thought to be subject to CA-TISCA based on the “most recent list” prepared as reported by the California Attorney General.<sup>32</sup>

While neither the CFTB nor the California Attorney General makes the list public, it may, however, be approximated. Our approach involved identifying companies according to the eligibility criteria by consulting database Compustat Monthly Updates (North America) for the U.S. listed public companies, and consulting the Forbes’ list of private companies,<sup>33</sup> and Inc.’s 5000<sup>34</sup> for private companies. We used revenue to proxy receipts. Consequently, we combed through all the companies in the aforementioned lists who are from a manufacturing or retailing related industry and meet the threshold of US\$ 100 million annual revenue. In addition, we also employed internet-based keyword searches (using the terms e.g. “California transparency” and “SB 657”) to capture any additional company disclosures. For those companies, we further consulted Hoovers<sup>35</sup> to retrieve country and revenue data.

#### 2. *“Pertinent statement” criteria*

With the universe of qualifying companies in hand, their websites were consulted. However, only companies with a pertinent statement on their website were evaluated. We operationalized “pertinent statement” with the following 4 criteria:

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<sup>30</sup> Jonathan Todres, Legal glitch means trafficking transparency law isn't so transparent, CNN, <http://edition.cnn.com/2015/06/16/opinions/california-transparency-supply-chains-law-trafficking/>, accessed on July 27, 2015.

<sup>31</sup> The criteria for eligibility was four-fold: (1) being a “retail seller and manufacturer, (2) “doing business in” California, and (3) having annual worldwide gross receipts that exceed one hundred million U.S. dollars (US\$100,000,000).

<sup>32</sup> see bottom of page 3: Kamala D. Harris, The California Transparency in Supply Chains Act – A Resource Guide, Attorney General California Department of Justice, 2015, <http://oag.ca.gov/sites/all/files/agweb/pdfs/sb657/resource-guide.pdf>, accessed on October 2, 2015.

<sup>33</sup> Forbes, America's Largest Private Companies, 2015 Ranking, <http://www.forbes.com/largest-private-companies/list/>, accessed September 2015.

<sup>34</sup> Mansueto Ventures, The 2015 Inc. 5000, <http://www.inc.com/inc5000>, accessed September, 2015.

<sup>35</sup> Hoovers, [www.hoovers.com](http://www.hoovers.com), accessed October, 2015.



- (1) The name, in whole or in part or a derivative name of the Act (e.g. “California transparency,” “SB 657,” “TISCA,” etc.) is explicitly mentioned in the file/disclosure/statement or on the company’s website;
- (2) if (1) is not given, it is obvious that the file/disclosure/statement is addressed to CA-TISCA, e.g. with CA-TISCA’s 5 disclosure topics listed;
- (3) if (1) and (2) are not given, the file/disclosure/statement contains themes and keywords that are associated with CA-TISCA;
- (4) if (1), (2) and (3) are not given, the home page link e.g. reading “Transparency in the Supply Chain” leads the viewer to a pertinent statement.

In any of the above four cases, it was concluded that the information was compiled (possibly not exclusively) for the purpose of CA-TISCA, and the statement was evaluated. Companies that met the qualification criteria but for which we could not find a statement posted on their web site are listed in *Appendix F Potentially qualifying companies*.

### **3. Instrument**

This study’s instrument features eight (8) compliance criteria based on the law’s core requirements, resulting in a compliance score, and seven (7) indicators concerning affirmative conduct as disclosed, yielding an affirmative score. The compliance criteria are based on the letter of the law, however interpreting legal intent when confronted with the range of law operationalization possibilities. These criteria gauge the extent to which the company looks the bull in the eye. A compliance point was assigned when the disclosure addressed the reporting requirement, and an affirmative point was assigned when the company stated their action was affirmative with respect to a particular disclosure requirement. In addition, the study collects 19 additional data points of interest.

The themes of the instrument mirror those addressed in CA-TISCA, which, as mentioned, are: (a) human trafficking and slavery risk assessment and Verification, (b) Audits, (c) Certification, (d) Internal accountability, and (e) Training, *VACIT* for short.

### **4. Evaluator team, orientation and data quality control**

For this study, a team of 3 Juris Doctors, a History PhD, a business graduate school student and the author evaluated the corporate disclosure statements. Multiple meetings and mock evaluation sessions ensured that all applied the instrument with the same perspective and rigor. For additional data quality control purposes, we built a 10% evaluation redundancy into the evaluation process.



### **5. Data collection timeframe**

The instrument was developed in August, 2015. Data collection occurred between September 1<sup>st</sup> and October 28<sup>th</sup>, 2015. It is thus possible that a company updated its statement in between the time of our scrutiny thereof and the release of this report.

### **6. Independence of author and competing interests**

This study was designed *ex novo* by the author, and executed by the core research team. Input on the part of the study's Advisory Panel was received and considered for the instrument and report.

The author declares that he has no competing interests or a conflict of interest in duly carrying out this study. He does not directly hold stock nor knowingly hold stock or funds of evaluated companies. In sum, he had no known vested interests vis-à-vis the findings of this study.

## **IV. Findings**

### **1. Profile of disclosing companies**

#### Number of evaluated and potentially qualifying companies

In total we identified 2,126 “potentially qualifying” companies identified based on CA-TISCA-prescribed parameters, a number moderately higher than the “approximately 1,700 companies” “likely subject to the law” according to the CFTB.<sup>36</sup>

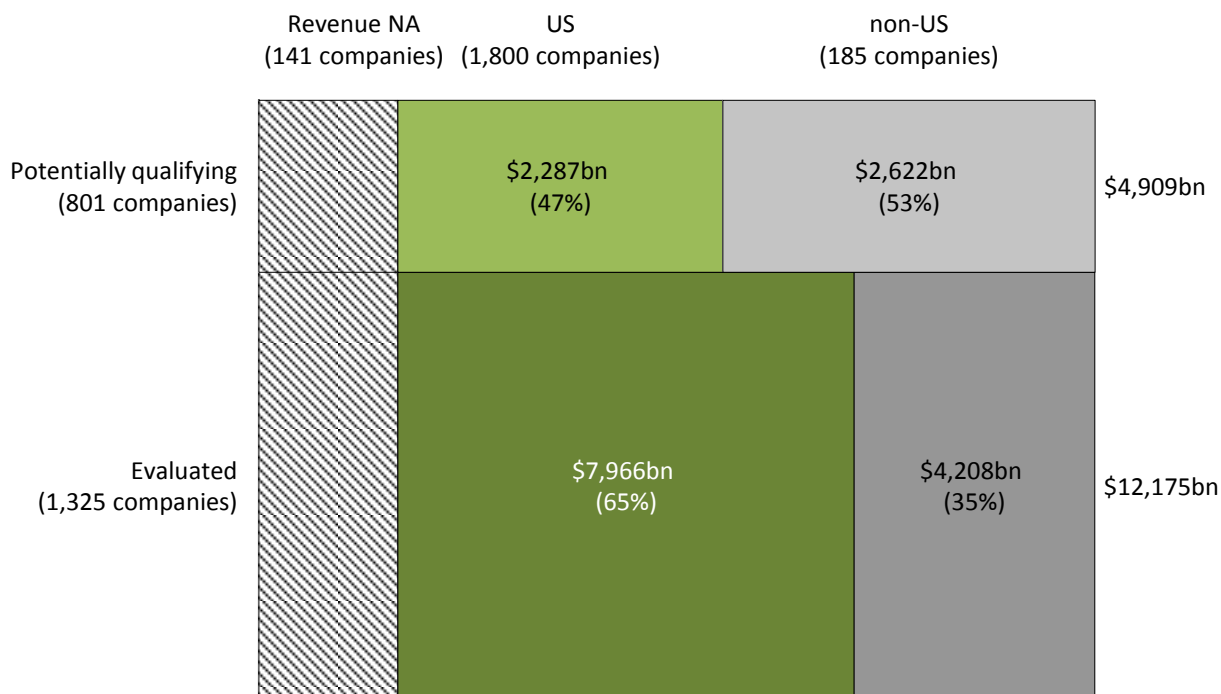
Of the 2,126 “potentially qualifying” companies, 1,325 companies had posted a pertinent corporate statement on their website – which were consequently evaluated (see *Appendix E*). As some qualifying companies' subsidiaries or brands each had a statement, in all we evaluated 1,504 individual disclosures. The 801 qualifying companies which however did not post a statement to their website were flagged as “potentially qualifying” in *Appendix F*. Thus, 62% of qualifying companies had a “pertinent statement.”

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<sup>36</sup> see bottom of page 3: Kamala D. Harris, The California Transparency in Supply Chains Act – A Resource Guide, Attorney General California Department of Justice, 2015, <http://oag.ca.gov/sites/all/files/agweb/pdfs/sb657/resource-guide.pdf>, accessed on October 2, 2015.



Figure 1: Annual revenue structure of all companies concerned

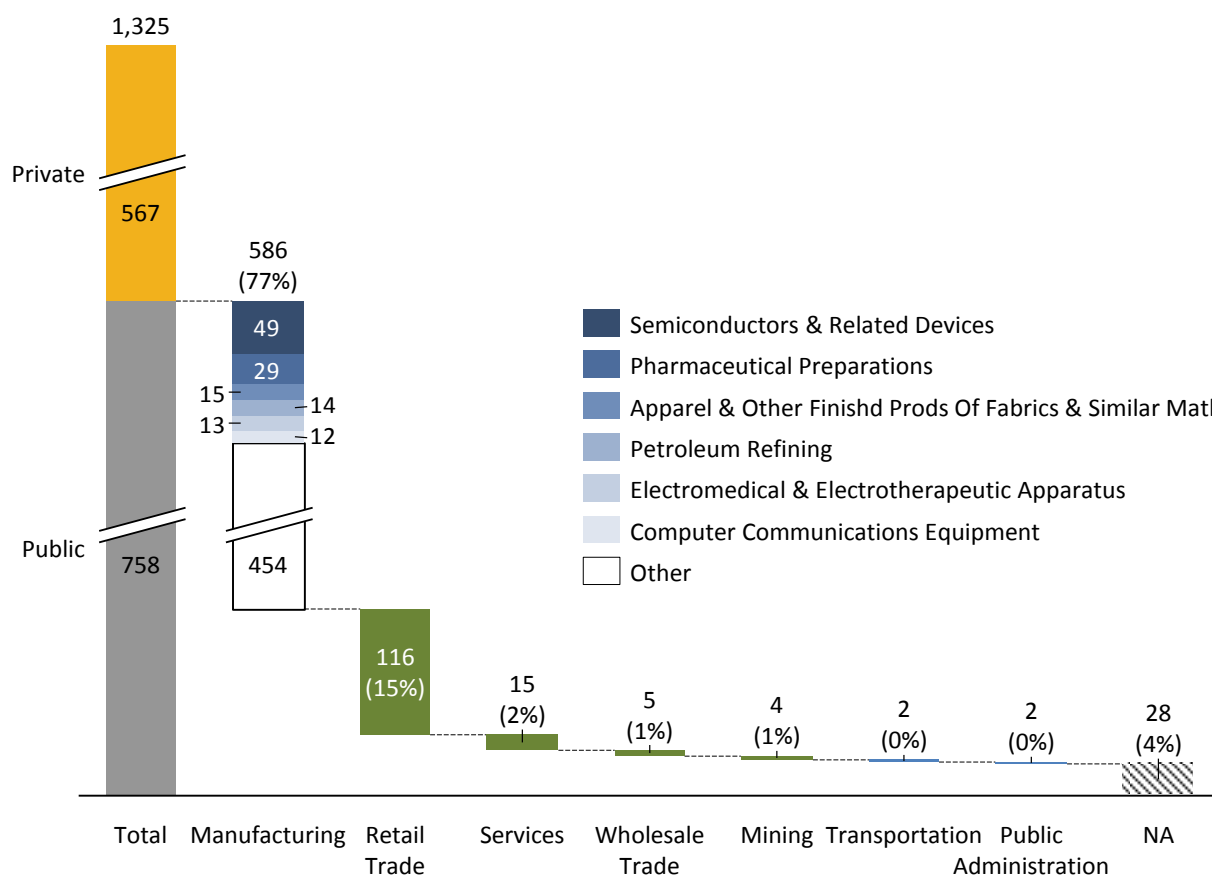


Source: Revenue data retrieved from Hoover, Compustat, Forbes, and Inc. in October 2015, either for Fiscal Year 2013, 2014 or 2015

No law is obscure that affects companies earning approximately \$17 trillion per year (see *Figure 1*). Seventy-seven (77%) percent of affected companies are manufacturers and 15% are retail sellers, sectors the CA-TISCA explicitly targets (see *Figure 2*). Sectors that one might not immediately consider as being affected (e.g. Services, Wholesale trade and Mining) are however, possibly due to diversified portfolios and the limitation of having to choose one CIK. Also, not too many more public (57%) than private (43%) companies are affected. While the majority (80%) of companies are headquartered in the U.S., a good number (9%) are also “foreign” (see *Figure 3*). One hundred and twenty-four (9%) of non-U.S. based companies are also affected, including Swiss, French, German, Canadian, Japanese and British companies.

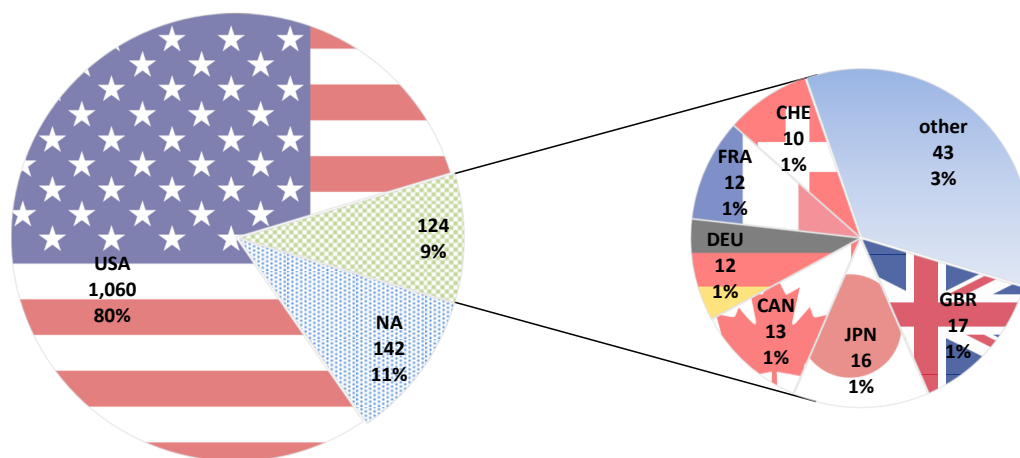


**Figure 2: Type and industry distribution of evaluated companies**



Source: Data retrieved from Compustat in October 2015

**Figure 3: Country distribution of evaluated companies**



Source: Revenue data retrieved from Hoover, Compustat, Forbes, and Inc. in October 2015



## 2. Corporate disclosure compliance

### i. Summary of corporate compliance criteria

The company disclosure statements were evaluated based on the strictly CA-TISCA-derived 8-point criteria. Keywords are in bold for added emphasis. The statement was to:

<i>Criteria</i>	<i>possible points</i>
1. have a conspicuous and easily understood <b>link</b> on the business' homepage.	1
2.A. note whether the company performed <b>verification</b> of product supply chains to evaluate and address risks of human trafficking and slavery	.5
2.B. note whether the company had such verification performed by <b>3<sup>rd</sup> party</b>	.5
	} 1
3.A. note whether the company conducted <b>audits</b> of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains	.5
3.B. note whether the company's verification involved <b>independent</b> and <b>unannounced</b> audits	.5
	} 1
4. note whether the company requires direct suppliers to <b>certify</b> 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.	1
5. note whether the company maintains <b>internal accountability standards</b> and <b>procedures</b> for employees or contractors failing to meet company standards regarding slavery and trafficking.	1
6. note whether the company provides employees and management, who have direct responsibility for supply chain management, <b>training</b> on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.	1
<i>possible points</i>	6



Criteria 2 and 3 and criteria 4 and 5 are each given a half point such that they are in line with CA-TISCA's 6 must-do requirements. Thus, the denominator is six (6): five (5) criteria points for the substantive requirements, plus one (1) point for a "conspicuous and easily understood link" on the company's website.

## ii. Findings of disclosure criteria and indicators

This section features the evaluation results as revealed by the disclosure requirements according to the operationalized interpretation of the verbatim CA-TISCA language. The aggregated results of each compliance-based criteria and indicator are also displayed. For the individual company compliance scores please see *Appendix E*.

As a general rule, even if a company's statement was considered pertinent (the criteria explained in section "2. Pertinent statement" criteria under *III. Methods*), in order for a company to receive compliance points, its disclosure statement had to make clear that the referenced action or inaction was performed with regard to slavery/human trafficking. In other words, if a company simply stated that it performed audits or provided training for the employees responsible for the supply chain, but did not specify that the audits or the training were done with regard to slavery/human trafficking, it did not receive points for that particular disclose requirement. Unfortunately, a lack of specificity cost companies points, e.g. in the case when a company states it performs x, y, and z, but nowhere specifies that these actions concern human trafficking/ slavery. Including a generalized introductory sentence in the statement, e.g. that it condemned all forms of forced labor, would not make explicit that its outlined activities were AHT-relevant.

### **1.A. Criteria: Presence of conspicuous link to statement on homepage**

*CA-TISCA language:* "The disclosure described in subdivision (a) shall be posted on the retail seller's or manufacturer's Internet Web site with a conspicuous and easily understood link to the required information placed on the business' homepage."

*Operational interpretation:* A company was awarded a point when:

- a) there was a conspicuous link on the company's homepage (e.g. "California supply chain disclosure") directly linked with the disclosure;
- b) there was a conspicuous link on the company's homepage directly linked with the introduction of the disclosure, and a link to the full disclosure can be easily found in the introduction.





No point was awarded when:

- a) a visitor cannot find a link connected to the disclosure directly on the company’s homepage, e.g. because it is hidden in the drop down menu, or the viewer must unhide some content on the homepage;
- b) although there is a link, the link’s language is ambiguous such that it’s not obvious that the link would direct the viewer to the disclosure.
- c) although there is a link, it does not work. This case presents a much greater problem for companies than just the point loss on this one criterion: if the link is defective, the company receives zeros on all other compliance criteria.

Our evaluation yielded that 53% of disclosing companies indeed had a URL link to their statement on their website (see *Figure 4*).

Figure 4: Presence of conspicuous link to statement on homepage



**1.A.a. Indicator: Disclosure statement readily accessible (non-graded)**

Although a company may not have a pertinent link on their homepage, it still might have posted a pertinent statement readily accessible on its web site. A company would however not earn a point for this indicator, as the statement being readily accessible would not equal a “conspicuous and easily understood link... placed on the business’ homepage” according to the law.

A disclosure statement was deemed readily accessible (“yes”) if:

- a) the disclosure can be quickly found under “Corporate Governance” or “Corporate Social Responsibility,” “Supply Chain Management” or the like;
- b) the viewer can find the disclosure within half a minute in the company’s website (without using an external search engine);
- c) the disclosure can be found using the search engine embedded in the company’s website with key words “California transparency” or “slavery” or “human trafficking” and the disclosure is among the first 5 searched results.

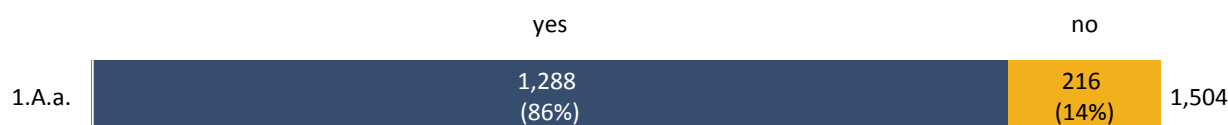
A “no” is applied if a company’s search engine is not available, or the search engine is available but the disclosure can’t be easily found, there are too many web pages to traverse until a visitor



reaches the disclosure, or too many columns (drop-down or static) coexist, all of which could theoretically contain the disclosure.

Eighty-six (86%) percent of evaluated companies had a disclosure statement that was readily accessible (see *Figure 5*), and almost all companies referenced CA-TISCA in their statement or website (see *Figure 6*). Comparing the results of *Figure 5* with those of *Figure 4*, it becomes apparent that although many companies in fact have a disclosure statement, they do not post it to their homepage in a conspicuous manner, and consequently and unnecessarily fall short on compliance.

Figure 5: Disclosure link readily accessible



**1.A.b. Indicator: Reference to CA-TISCA in statement or website (non-graded)**

An even greater number of companies, 98% of disclosing entities in fact, referenced the Act in some way shape or form in their website (see *Figure 6*).

Figure 6: Reference to CA-TISCA in statement or website



**2.A. Criteria: Disclosure of risk assessment and risk mitigation verification**

*CA-TISCA language:* Disclosure specifies whether or not / to what extent company “Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery.”

*Operational interpretation:* A disclosing entity was awarded a point when it described whether or not it evaluated and addressed risks associated with human trafficking and slavery.<sup>37</sup> The

<sup>37</sup> Technically, half a point (.5), as the point for risk verification was divided by two as the law stipulates 2 relevant criteria. The other half point could be made by achieving criteria 2.B.



aspect of risk assessment would need to be mentioned, as well pro-active actions a company took to counter such risk.

Our analysis shows that 64% correctly disclosed whether or not the company “Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery” (see *Figure 7*).

**Figure 7: Risk assessment and risk mitigation verification**



**2.B. Criteria: Disclosure of risk verification performance by 3<sup>rd</sup> party**

*CA-TISCA language:* “The disclosure shall specify if the verification was not conducted by a third party.” It may be inferred by this disclosure requirement that the lawmaker’s preference is that such verification be in fact carried out by a 3<sup>rd</sup> party.

*Operational interpretation:* A disclosing entity was awarded a point when it described whether or not such verification was conducted by a 3<sup>rd</sup> party.<sup>38</sup> A point was also assigned if the company itself conducted the verification and this precludes 3<sup>rd</sup> party involvement, such as language along the lines of: “We ourselves did the verification” or “Our employees performed the verification.” However, no disclosure point was given when a company vaguely stated something along the lines that “we performed verification...” No point was awarded if a disclosing entity simply and generally had stated that it “was currently developing verification procedures” or similar.

A bit more than half (54%) of disclosing entities correctly disclosed whether or “the verification was not conducted by a third party” (see *Figure 8*).

**Figure 8: Risk verification performed by 3<sup>rd</sup> party**

<sup>38</sup> Technically, half a point (.5), as the point for risk verification was divided by two as the law stipulates 2 relevant criteria. Together with criteria 2.A. the denominator would be one point.



**2.B.a. Indicator: In-house risk verification (non-graded)**

Twenty-nine (29%) of disclosures specified that the risk verification was performed in-house (see Figure 9). The difference between the number disclosing entities who reported they did not engage 3<sup>rd</sup> parties in risk verification activities (46%) and the number of disclosing entities who reported in-house risk verification (29%) was 17%. Among these 17% of disclosing entities, some reported that they for example relied on their suppliers to themselves conduct the risk verification.

Figure 9: In-house risk verification



**2.B.c. Indicator: Verification of all direct suppliers (non-graded)**

Sixty (60) disclosing entities (4%) specified they performed such verification on *all* their direct suppliers. Only companies were counted which made it explicit that *every* supplier had been verified. If a company made a general statement (“we verify our product supply chain...”), we did not consider that as verifying all direct suppliers.

**2.B.e. Indicator: Frequency of risk verifications (non-graded)**

Seventy-one (71) companies (5%) specified the frequency of risk verifications (see Table 1).



Table 1: Frequency of verifications

Frequency	# statements
regularly	33
annually	24
conditionally / risk-based	7
biennially	4
every three years	1
only when convenient	1
once	1
<b>Total</b>	<b>71</b>
<i>not specified</i>	<i>1,433</i>

### **3.A. Criteria: Disclosure of audit practice**

*CA-TISCA language:* Disclosure specifies whether or not / to what extent company “Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.”

*Operational interpretation:* The key word is *audits*. To receive a point, a company would mention whether or not it has an audit program in place that audits suppliers in line with the company’s own standards concerning trafficking and slavery in supply chains.<sup>39</sup> Either the disclosure language would make it explicitly clear that trafficking and slavery criteria would be a part of audits, or it would reference the supplier code of conduct, specify that the code contained trafficking and slavery-related standards, and state that audits undertaken also investigated conformance with said supplier code of conduct. A disclosure that stated something along the lines that the company “reserved the right” to conduct audits was not awarded a point, as it does not state, as a matter of fact, whether or not it did or did not conduct relevant audits. We also note that the law’s language does not limit audits to direct suppliers, and could therefore be interpreted to mean the entire supply chain. Credit was however awarded to a disclosure that discussed either audit scope.

We found that 74% of disclosing entities correctly disclosed whether or not the company “Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains” (see *Figure 10*).

<sup>39</sup> Technically, half a point (.5), as the point for audits was divided by two as the law stipulates 2 relevant criteria. The other half point could be made by achieving criteria 3.B.



Figure 10: Practice of audits



**3.A.a. Indicator: Frequency of audits (non-graded)**

One hundred and forty-six (146) companies (10%) specified the frequency of their audits as reproduced below in *Table 2*.

Table 2: Frequency of audits

Frequency	# statements
annually	55
regularly	47
conditionally / risk-based	33
occasionally	3
biennially	3
biannually	2
every three years	2
every five years	1
<b>Total</b>	<b>146</b>
<i>not specified</i>	<i>1,358</i>

**3.B. Criteria: Disclosure of independence and unannounced nature of audits**

*CA-TISCA language:* “The disclosure shall specify if the verification was not an independent, unannounced audit.” It may be inferred by this disclosure requirement that the lawmaker’s hold that audits which are conducted by a 3<sup>rd</sup> party and unannounced are more robust and carry with them an inherent malefaction deterrence factor for suppliers.

*Operational interpretation:* A disclosing entity was awarded a point when it described whether or not audits were independent *and* unannounced.<sup>40</sup> Disclosures would only get a point if both conditions (unannounced AND independent) were met. Language along the lines of “We are currently developing auditing procedures” did not receive a disclosure point as it would not

<sup>40</sup> Technically, half a point (.5), as the point for audits was divided by two as the law stipulates 2 relevant criteria. Together with criteria 3.A. the denominator for audits would be one point.



state in fact whether or not past audits had taken place and whether they were independent and unannounced.

We observed quite a few cases in which a company would say that they perform unannounced audits but did not specify whether this was done by a third party (or vice versa). Also, an OR formulation would not be counted as a full disclosure. If a company stated something along the lines of “we conduct announced and unannounced audits,” they would receive a disclosure point, but if they said “we perform announced OR unannounced audits” or “audits were conducted by ourselves OR a third party,” the company would not receive the relevant disclosure point, since it did not answer the relevant question.

Fifty-seven (57%) percent of disclosing entities correctly disclosed whether or not the audit(s) was/were “independent” and “unannounced” (see Figure 11).

*Figure 11: Practice of independent and unannounced audits*



**4.A. Criteria: Disclosure of supplier certification of compliance with pertinent laws**

*CA-TISCA language:* Disclosure specifies whether or not / to what extent: company “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.”

*Operational interpretation:* As the term “certify” is not defined by CA-TISCA, we interpreted the legislative intent to signify additional assurance provided in writing by the supplier that it had complied with the national laws regarding slavery and human trafficking of the country or countries it was doing business. We thus did not presume that the legislative intent was that company disclosure also specify whether or not their certification involved an independent, 3<sup>rd</sup> party verification premised on an established behavioral standard – conventionally associated with the term “certification.”





Importantly, this disclosure item should refer to slavery/human-trafficking laws, and a company was to specify whether or not its suppliers are required to confirm this “in writing.” We observed cases in which companies would use an “expect”-formulation such as: “We expect our suppliers to comply with all laws.” And this formulation is not tantamount to a “certification” by the suppliers. Some companies reported e.g. that they signed statements of compliance and purchase order terms and conditions with all of its suppliers, which include agreements on the part of the supplier to comply with all local, state and federal laws and regulations which may apply.

The temporal aspect is also relevant. With our understanding of the legislative intent, the term “certify” signifies an active step taken by the supplier performed ex post-facto. Merely pointing to a supplier contract containing relevant language would thus not fulfill the requirement to disclose whether or not the supplier “certified” compliance with national laws.

Sixty (60%) of disclosures stated whether or not their suppliers certify compliance with pertinent laws (see *Figure 12*).

*Figure 12: Supplier certification of compliance with pertinent laws*



**5.A. Criteria: Disclosure of internal accountability standards and procedures**

*CA-TISCA language:* Disclosure specifies whether or not / to what extent: company “Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.”

*Operational interpretation:* Standards and procedures are components of an internal accountability system. A description of whether or not a company had these relevant elements of an accountability system in place allowing the company/contractor to take necessary action would receive a point. Relevant information, if answered in the affirmative, would be discussion of the existence of standards such as employee/contractor code of conduct, and whether or not a supplier/contractor contract could be terminated or not renewed as a consequence. Relevant procedures would e.g. include employee grievance or dispute



resolution mechanism, and a hot-line for employees to report complaints. However, stating something along the lines of “we will investigate if we hear of a potential human rights violation,” or simply “we have a hotline in place in case someone wants to bring a possible violation to our attention” would not suffice.

Of note here is also the term “contractor.” A contractor may not necessarily be a supplier, depending on how individual companies define those terms. A contractor performs a service, a supplier provides physical components, materials or products. Janitorial services, construction contractors, temp employees, for instance, are frequently not considered suppliers. We however awarded a point when there was discussion of the existence or non-existence of internal accountability standards, regardless of whether for employees or contractors, or both.

Fifty-five (55%) of disclosures stated whether or not their company “Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking” (see *Figure 13*).

Figure 13: Internal accountability standards and procedures



**5.A.a. Indicator: URL to company’s code of conduct (non-graded)**

Code of Conduct designation varied between companies. Some companies called it “supplier code of conduct,” “code of business” or “code of ethics.” Just about one fifth of disclosures include a link to the corporate code of conduct or equivalent (see *Figure 14*).

Figure 14: URL to company’s code of conduct





**5.A.b. Indicator: Language suggesting possible termination of supplier/contractor contracts (non-graded)**

On this indicator our interpretation was quite liberal, marking “yes” even when they did not explicitly state that they would necessarily terminate the business relationships. When, for example, companies said that they would "reconsider the business relationship" or "take all necessary steps” to make sure that their supply chain is slave-labor free, we interpreted this language as strong enough to warrant a “yes” on this question.

Interestingly, almost half (47%) of disclosures mentioned in their disclosure that they would apply some sort of contractual conditionality with respect to non-compliant suppliers (see *Figure 15*).

Figure 15: Possible termination of supplier/contractor contracts



**6.A. Criteria: Disclosure of training on human trafficking and slavery**

*CA-TISCA language:* Disclosure specifies whether or not / to what extent: company “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.”

*Operational interpretation:* The disclosure statement needs to make explicit that the training relates to slavery/human-trafficking issues. Simply stating that the personnel responsible for managing the supply chain receives “training” is not good sufficient, unless of course the company specifies that employees and management receives training with regard to the code of business / company standards which includes anti-slavery standards.

Another issue we observed was the target audience of training. While some companies did state that they trained managers/personnel of suppliers, the disclosure requirement clearly focuses on training held at the disclosing company level.

Sixty-eight (68%) of disclosure stated whether or not their company provided such training to their employees and management” (see *Figure 16*).



Figure 16: Training on human trafficking and slavery



iii. Disclosure compliance scores

This study reveals that, overall, performance greatly varies between companies. *Figure 17* indicates that, on average, corporate disclosure compliance is not exceptional, but also not deplorable. *Figure 18* illustrates that the mode score was 5 points (17%), followed by 4 points (15%) and 6 points (14%). The disclosure compliance score of companies with statements ranged between 0% (0 points) and 100% (6 points), with an average of 60% (3.6 points) and a median of 67% (4 points), as displayed in *Figure 19*. Forty-one percent (41%) of companies were found to have a corporate disclosure score on or above the 70% (4.2 points) mark.

*Figure 19* depicts the percentile rank of company disclosure scores. The percentile rank can be interpreted as the percentage of one's outperformed peers – the higher the percentile rank, the better one's standing. For example, to outscore 50% of one's peers, one must possess at least a score corresponding to the percentile rank of 50%. In this case, as illustrated by *Figure 19*, to outdo 50% of one's peers one has to achieve 4 points (the median) or more, and 5 points or more to not have a lesser score than 75% of peers.

In sum, while many companies are fully compliant – 205 or 14% – others still have homework to do (for the individual company compliance scores please see *Appendix E*). In general, more work is needed to educate oneself about the disclosure requirements and identifying low hanging disclosure fruit. Reporting on one's relevant corporate action also involves taking inventory on initiatives also in line with the spirit of CA-TISCA. The next challenge would be to craft or re-work the disclosure statement such that it is accurate and also reflects the company's values and relevant efforts underway, ensuring the statement is fully compliant with the letter of the law.



Figure 17: Aggregated results of 8 compliance-based criteria

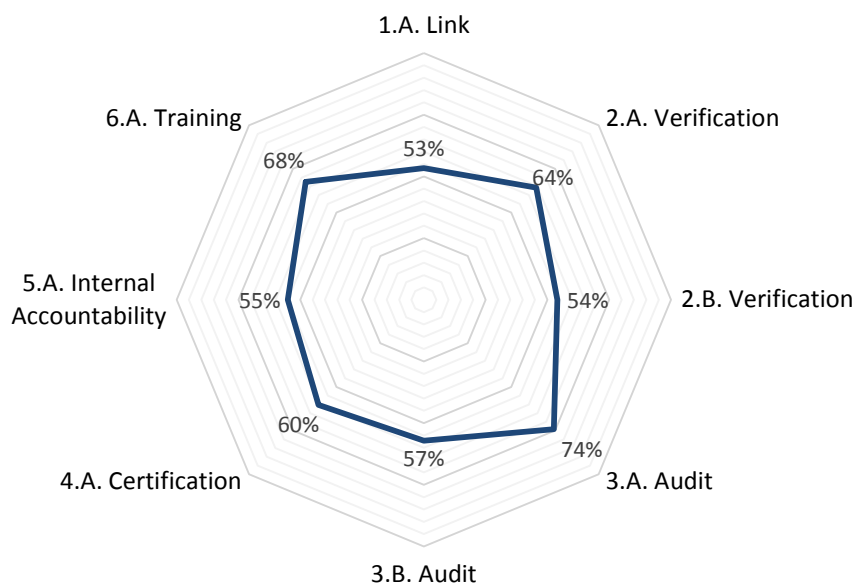
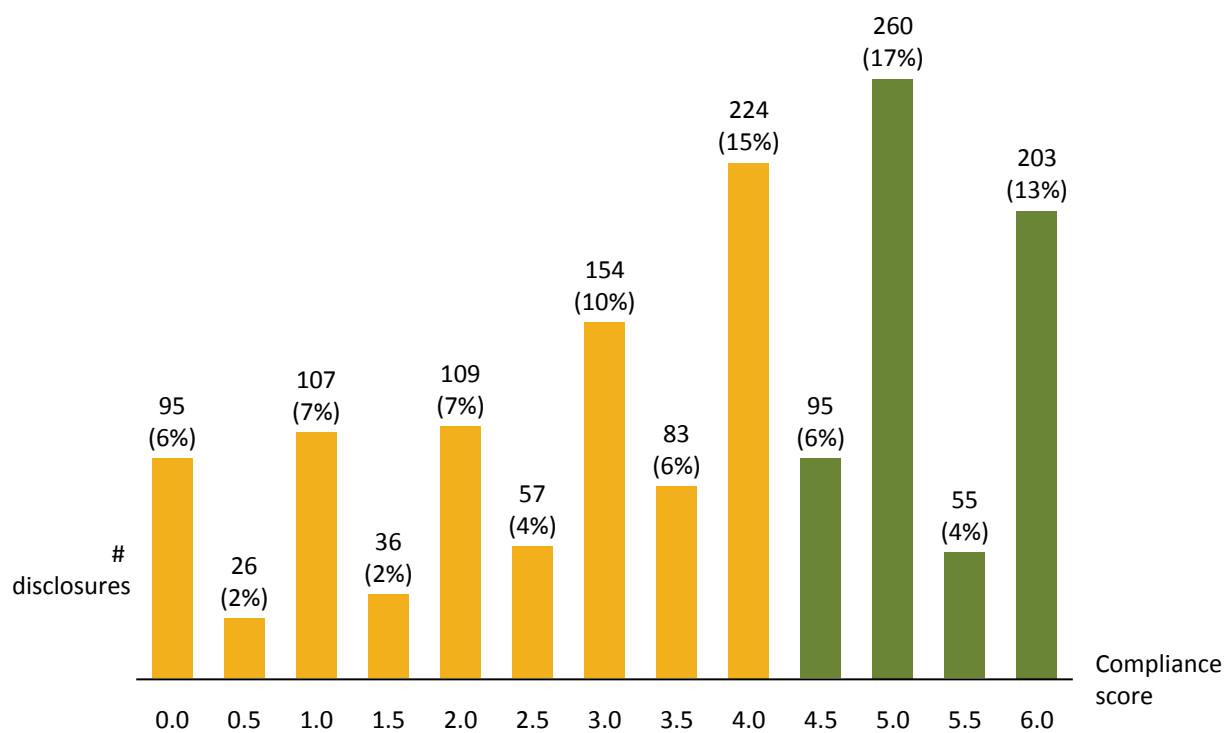
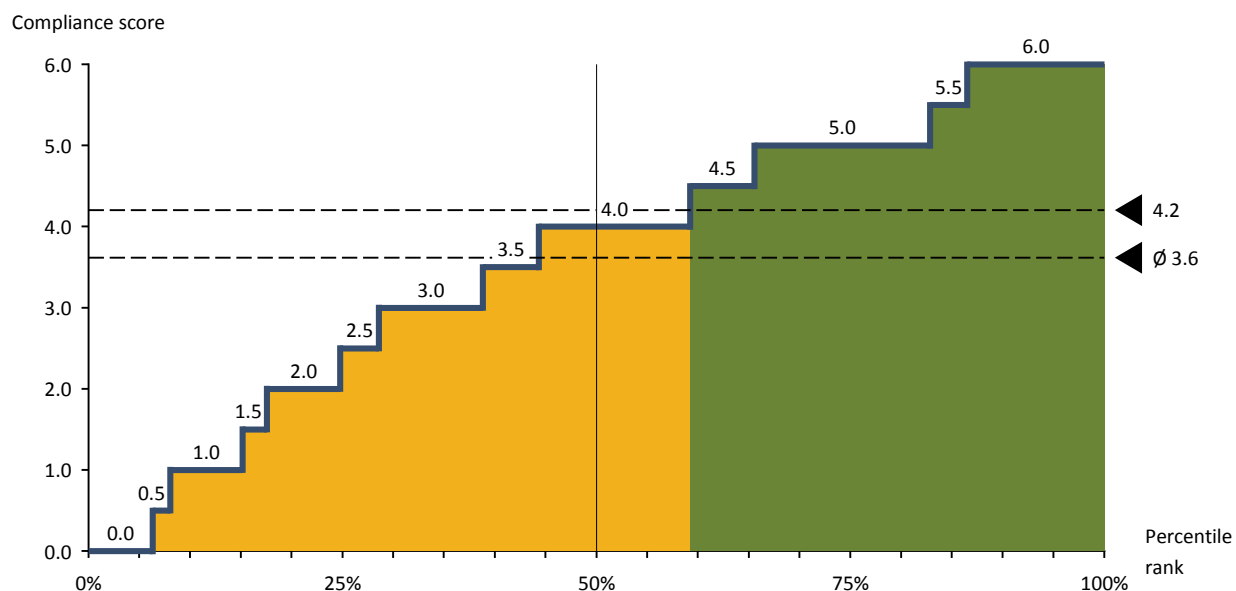


Figure 18: Corporate disclosure scores, histogram





*Figure 19: Corporate disclosure scores, percentile rank*



As an example of an incomplete disclosure statement, we note what appears to be a trade association communiqué informing auto manufacturers about warnings issued by the California State’s Attorney General concerning compliance with CA-TISCA, and suggesting template language in order to become compliant (see *Appendix D*). Boilerplate language is thus apparently being used e.g. in this case by Californian car dealerships Claremont VW<sup>41</sup> and Claremont Mazda.<sup>42</sup> These disclosures however do not receive disclosure compliance points as these dealerships clearly did not author their disclosure statement. Over to you, Wayne.

### **3. Affirmative corporate conduct**

As described in the Methods section, company statements were furthermore assessed in terms of their reporting affirmative conduct vis-à-vis human trafficking and slavery. An “affirmative conduct” point was awarded for every one of the law’s 7 substantive disclosure criteria reported by the company in the affirmative.

In addition, we noted when a company remarked that it was currently developing a certain standard, system or function (“working on it”). While this note did not receive points, it does

<sup>41</sup> Claremont VW, <http://www.claremontvw.com/Supply-Chains-Act-Disclosure?cs:a:i=QuickLinks>, accessed Oct. 20, 2015.

<sup>42</sup> Claremont Mazda, <http://www.claremontmazda.com/TRANSPARENCY>, accessed Oct. 20, 2015.



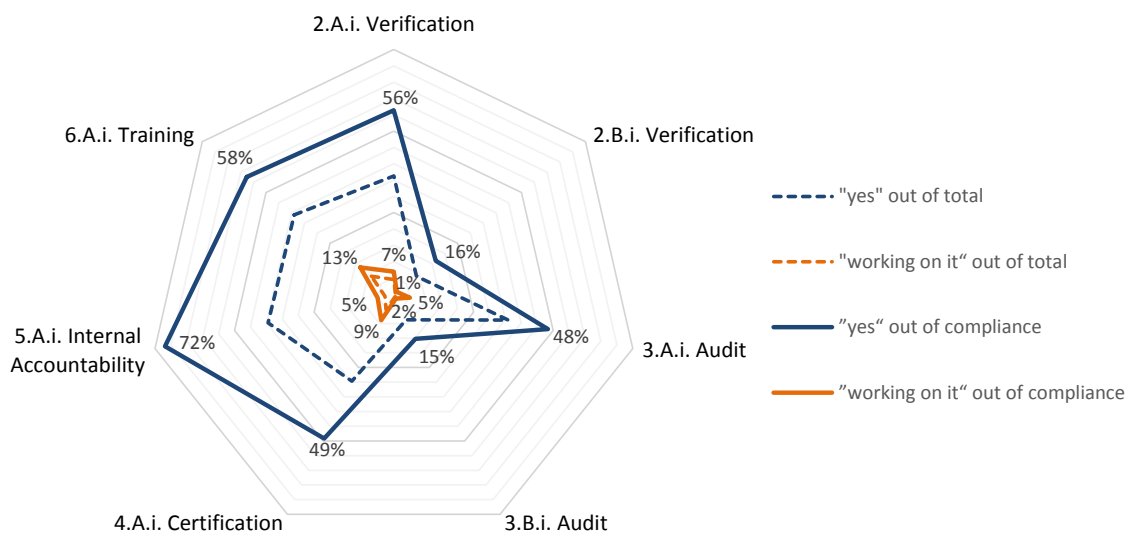
let stakeholders know that pertinent action is on the horizon. However, a company was not considered to be “working on it” if its reported language e.g. stated “we consider/look into the possibility of including slavery issues in our training...” or “we may develop accountability standards and procedures.”

Figure 20 presents the aggregate scores of the 7 affirmative corporate conduct indicators. The outer blue line represents the affirmative conduct scores of companies who are disclosure compliant. With regard to the strong points, the majority of companies report affirmative conduct on risk verification (56%), internal accountability (72%), and training (58%).

Conversely, a minority of companies report they in fact commission 3<sup>rd</sup> party risk verification (16%), conduct audits (48%), have audits performed that are independent and unannounced (15%), and have their suppliers certify compliance with relevant local laws.

Almost a third (30%) of disclosing entities – the mode – report they do not perform any of the VACIT actions (see Figure 21). Fifteen (15%) of companies however do report performing the majority of VACIT initiatives.

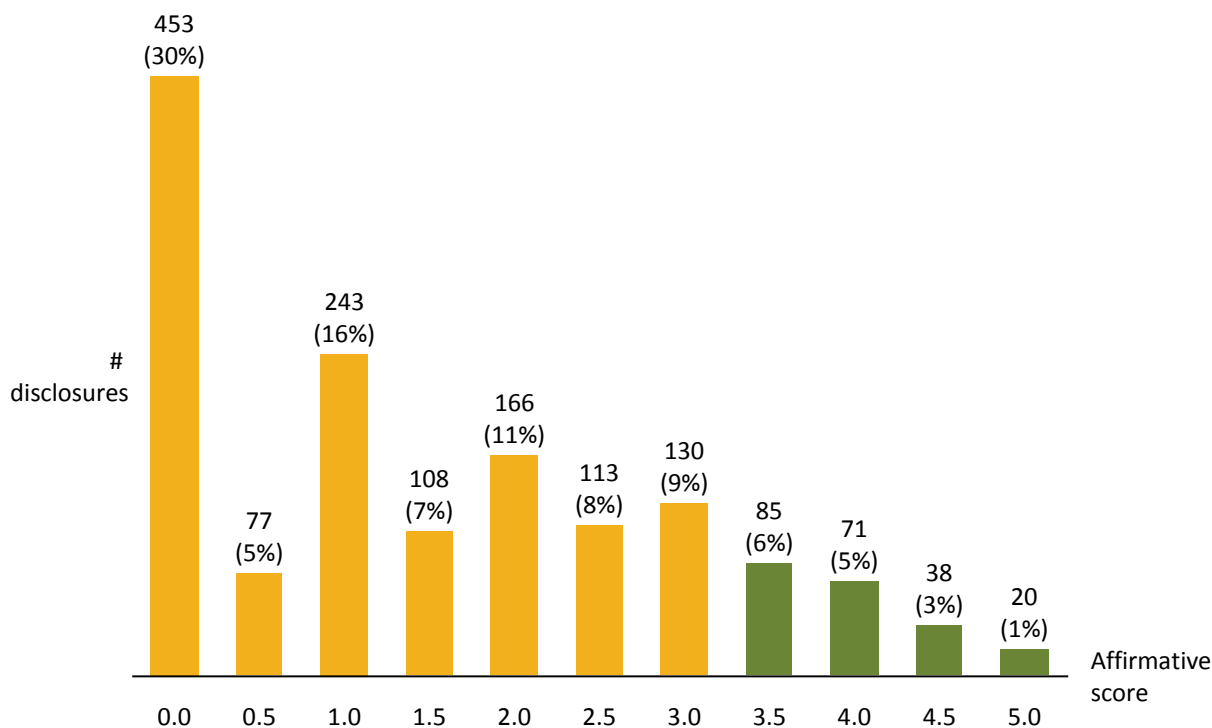
Figure 20: Aggregated results of 7 affirmative corporate conduct indicators







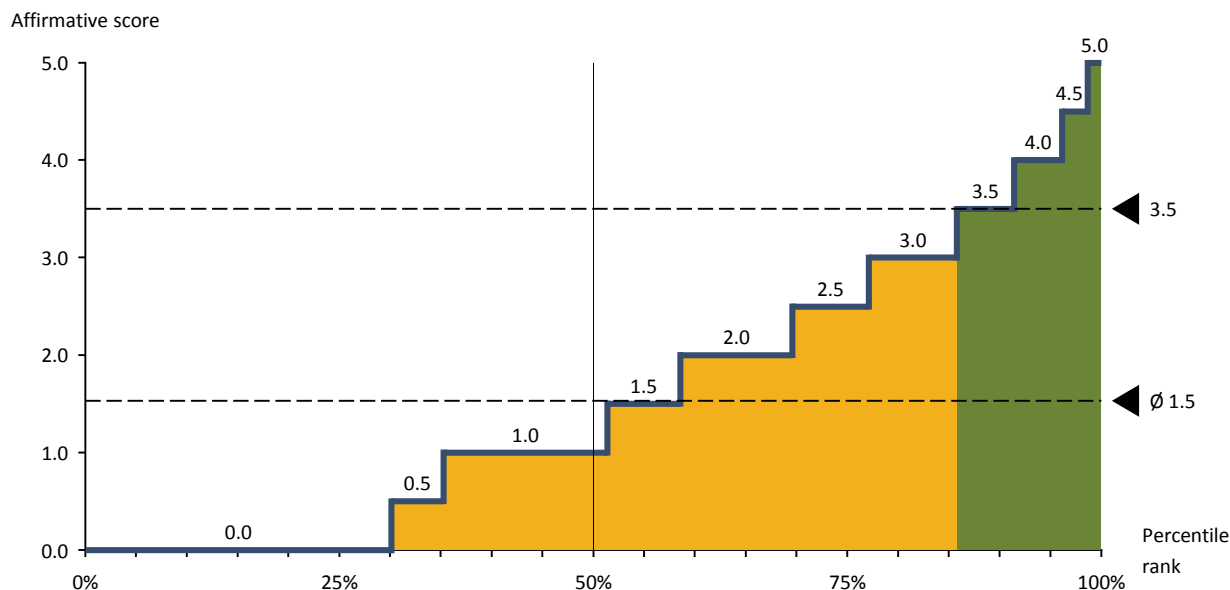
*Figure 21: Affirmative corporate conduct scores, histogram*



*Figure 22* below depicts the percentile rank of company disclosure scores. The percentile rank can be interpreted as the percentage of one's outperformed peers – the higher the percentile rank, the better one's standing. For example, to outscore 50% of one's peers, one must possess at least a score corresponding to the percentile rank of 50%. In this case, as illustrated by *Figure 22*, to outdo 50% of one's peers one has to achieve 1 point (the median) or more, and 2.5 points or more to not have a lesser score than 75% of peers.



Figure 22: Affirmative corporate conduct scores, percentile rank



The affirmative corporate conduct score of companies with statements ranged between 0% (0 points) and 100% (5 points), with an average of 31% (1.5 points) and a median of 20% (1 point), as visualized in *Figure 22*. Fourteen (14%) percent of disclosing companies were found to have an affirmative corporate conduct score on or above the 70% (3.5 points) mark. Fifteen (15%) percent of companies also noted that they were working on one or more CA-TISCA-relevant items. We therefore note that relatively few companies are using the opportunity of public reporting not only to be fully compliant, but also to showcase the company’s values and positive action undertaken.

We conjecture that possible reasons for the “weaker” degree of affirmative conduct is that:

- some qualifying companies believe that their supply chains are not exposed to trafficking and slavery;
- some relevant policies and systems (in line with VACIT) are not yet operational or official – and thus companies do not wish to make preparatory efforts known;
- some companies may consider rather reporting in the negative than in the affirmative – regardless of whether or not the company actually takes relevant steps – as they see possible lawsuits (based on inconsistencies between disclosed information / standards and supply chain issues which become public knowledge) as greater risk than brand damage due to non-affirmative conduct.

As a side note, some companies explained that as all their suppliers were from the U.S. and Canada, they do not verify, audit, certify, etc. That, however, misses the point as far as CA-



TISCA’s sponsors would have been concerned. For one, CA-TISCA implies that any company manufacturing goods would be well served to institute standards, systems and mechanisms that would avoid or detect and mitigate against labor. Two, one cannot rule out labor abuses in a country where millions of undocumented and migrant workers also are part of the labor force.

**Additional indicator 1: New / recent action related to AHT and/or anti-slavery**

As an additional indicator, we noted when a company reported recent or new action related to AHT and/or anti-slavery. One-fifth of disclosing companies did disclose that one or more actions were new or recent (see *Figure 23*).

*Figure 23: New / recent action related to AHT and/or anti-slavery*



**Additional indicator 2: Promise of new action / forward looking statement**

As a second additional indicator, we noted when a company promised new action or made a forward looking statement. Twenty-two (22%) percent of companies did so (see *Figure 24*).

*Figure 24: Promise of new action / forward looking statement*



**4. Compliance vs. affirmative conduct**

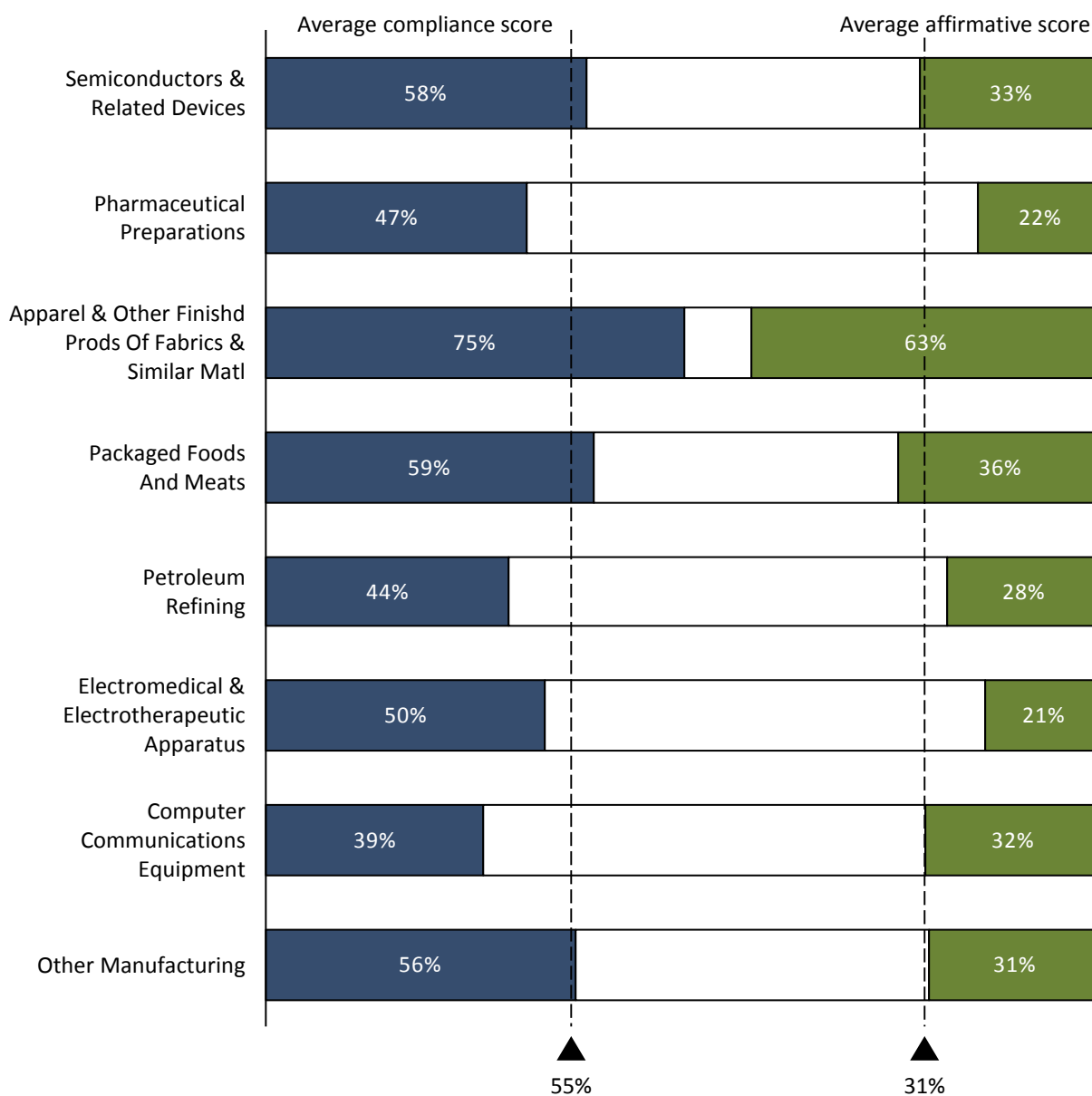
We furthermore note that the degree of corporate compliance, overall, is higher than the degree of affirmative corporate conduct. The average compliance/affirmative conduct divergence is 27 percentage points.<sup>43</sup>

<sup>43</sup> As the affirmative conduct score excludes the URL link criteria, in order to compare apples with apples we dropped that criteria (Criteria 1.A.) from the divergence comparison.



We note that the so-called Apparel Industry or Garment Sector, with an average compliance score of 75% and an average affirmative conduct score of 63% is, on both counts, the “market leader” among fellow industries (see *Figure 25*).

*Figure 25: Compliance vs. affirmative conduct of manufacturing companies*



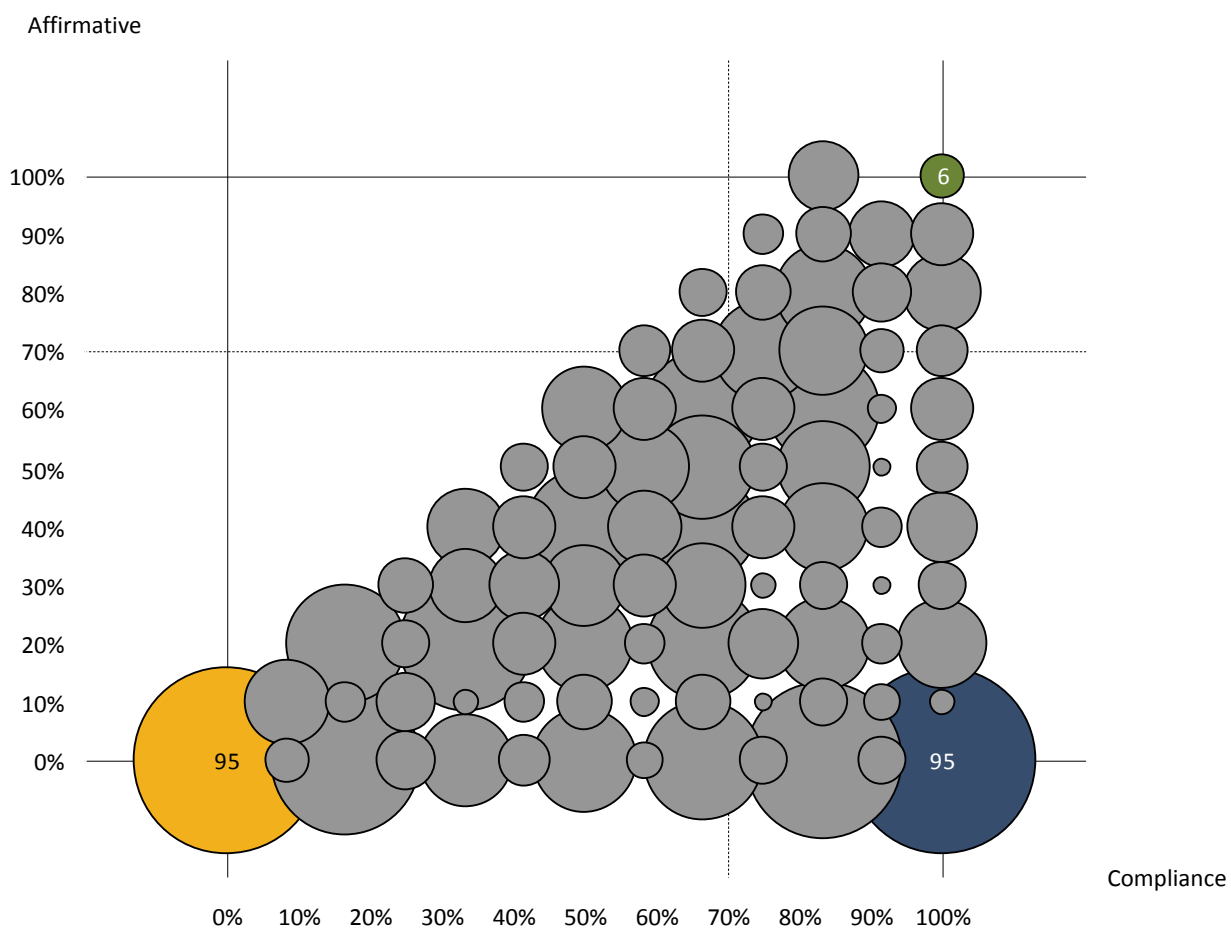
The bubble chart in *Figure 26* juxtaposes each company’s compliance score against its affirmative score. The chart illustrates that there are slightly more perfectly compliant



companies than perfectly non-compliant companies, but that only six (6) company's disclosure statements scored 100% on both disclosure compliance and affirmative conduct. They are:

1. ASO LLC
2. Guitar Center Inc
3. Bath & Body Works Direct Inc
4. Quidel Corporation
5. Recreational Equipment Inc
6. Sun-Maid Growers Of California

*Figure 26: Compliance vs. affirmative conduct bubble chart*





## APPENDICES

### *Appendix A: Acronyms*

AHT	Anti-Human Trafficking
B2B	Business-to-Business
CA-TISCA	California Transparency in Supply Chains Act (of 2010)
CIK	Central Index Key
CFTB	California Franchise Tax Board
DoD	Department of Defense
DOL	Department of Labor
FAR	Federal Acquisition Regulation
GDP	Gross Domestic Product
ICT	Information Communication Technology
ILO	International Labour Organization
IMF	International Monetary Fund
KYC	Know Your Customer
NA	Not available
NS	Not specified
SEC	Securities and Exchange Commission
TIP	Trafficking in Persons
TVPRA	Trafficking Victims Protection Reauthorization Act
TVPA	Victims of Trafficking and Violence Protection Act
URL	Uniform Resource Locator
VACIT	Verification, Audit, Certification, Internal Accountability, Training



## **Appendix B: Terminology**

While CA-TISCA features the terms “slavery” and “human trafficking,” it does not itself define them, nor have implementing regulations been promulgated that do so. We thus look to established (operational) definitions according to federal law.

The TVPA of 2000<sup>44</sup> defines “severe forms of trafficking in persons” to mean “(A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.” As the context of CA-TISCA is goods-producing or contracted labor performed by an often global work-force, for the purpose of this report the term “human trafficking” refers to actions that fall within definition (B), which is also the meaning of trafficking adopted by most companies complying with CA-TISCA.

The term “involuntary servitude” is related to the term “forced labor” and, as defined by the TVPA, “includes a condition of servitude induced by means of— (A) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or (B) the abuse or threatened abuse of the legal process.”

Peonage is a type of involuntary servitude of laborers whereby they have little control over their employment conditions.

The term “debt bondage” – as defined by the TVPA – “means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.”

The term “slavery” is often qualified as “modern-day slavery,” and is associated with practices such as bonded, or indentured labor, as well as deceptive and coercive recruitment.

Bonded or indentured labor is a practice whereby people are tied to their work through debt, and may involve a vicious cycle of debt, where, e.g. workers are charged for room and board. This may also occur through charging employees excessive recruitment fees which they are made to repay.

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<sup>44</sup> 106th Congress Public Law 386, Victims of Trafficking and Violence Protection Act of 2000, Oct. 28, 2000, <http://www.state.gov/documents/organization/10492.pdf>, accessed on September 24, 2015.





Deceptive recruitment may be present, to reference Executive Order 13627 language,<sup>45</sup> when “misleading or fraudulent recruitment practices during the recruitment of employees, such as failing to disclose basic information or making material misrepresentations regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions and housing (if employer provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work” is used.

Coercive recruitment, according to Executive Order 13627, involves “(iii) destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity documents, such as passports or drivers’ licenses.”

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<sup>45</sup> see section 2(a)(1)(A)(i) of EO 13627: Administration of Barack Obama, Executive Order 13627—Strengthening Protections Against Trafficking in Persons in Federal Contracts, Federal Register Volume 77 No. 191, September 25, 2012, <http://www.gpo.gov/fdsys/pkg/FR-2012-10-02/html/2012-24374.htm>, accessed on September 27, 2015.



## Appendix C: Disclosure evaluation instrument

Criteria #	Affirmative conduct #	Indicator #	Criteria	Compliance point?	Affirmative point?
1.A.			Conspicuous and easily understood link to the required information placed on the business' homepage.	1	-
		1.A.a.	Disclosure statement readily accessible	-	-
		1.A.b.	Reference to Act in statement or website?	-	-
2.A.			<i>Disclosure specifies whether or not / to what extent:</i> company performs verification of product supply chains to evaluate and address risks of human trafficking and slavery.	.5	-
		2.A.i.	Affirmative?	-	.5
2.B.			<i>Disclosure specifies whether or not / to what extent:</i> company had such verification performed by 3 <sup>rd</sup> party.	.5	-
		2.B.i.	Affirmative?	-	.5
		2.B.a.	Did company perform such verification internally?	-	-
		2.B.b.	Verification entity specified? If yes, state.	-	-
		2.B.c.	Verification of all direct suppliers?	-	-
		2.B.d.	# of direct suppliers?	-	-
		2.B.e.	Specification of frequency of verifications?	-	-
		2.B.f.	Description of methodology used to verify entities in the product supply chain. If yes, state method(s).	-	-
3.A.			<i>Disclosure specifies whether or not / to what extent:</i> company conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.	.5	-
		3.A.i.	Affirmative?	-	.5
		3.A.a.	Frequency of audits specified? If yes, state.	-	-
3.B.			<i>Disclosure specifies whether or not / to what extent:</i> company's verification involved independent and unannounced audits.	.5	-
		3.B.i.	Affirmative?	-	.5
		3.B.a.	If independent and unannounced, % of direct suppliers audited specified?	-	-
		3.B.b.	Auditing entity specified? If yes, state.	-	-



	3.B.c.	Audit standard specified? If yes, state.	-	-
	3.B.d.	Description of audit methodology? If yes, state.	-	-
4.A.		<i>Disclosure specifies whether or not / to what extent:</i> company 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.	1	-
	4.A.i.	Affirmative?	-	1
	4.A.a.	Third-party certification standard(s) mentioned? If so, specify.	-	-
5.A.		<i>Disclosure specifies whether or not / to what extent:</i> company maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.	1	-
	5.A.i.	Affirmative?	-	1
	5.A.a.	URL link to the company's code of conduct supplied?	-	-
	5.A.b.	Language suggesting possible termination of supplier contract?	-	-
6.A.		<i>Disclosure specifies whether or not / to what extent:</i> company provides 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.	1	-
	6.A.i	Affirmative?	-	1
	6.A.a.	3 <sup>rd</sup> party instruction entity? If so, specify.	-	-
	add.1	New / recent action related to AHT and/or slavery?	-	-
	add.2	Promise of new action / forward looking statement?	-	-
	comments		-	-
Compliance score			/ 6	-
Affirmative conduct score			-	/ 5



## Appendix D: Example of incomplete disclosure statement

### Attorney General Issues Warnings

(Continued from page 22)

#### Factories without Website Disclosures:

- Aston Martin
- BMW
- Ferrari
- Infiniti
- Jaguar
- Kia
- Land Rover
- Lexus
- Mazda
- Mercedes-Benz
- MINI
- Mitsubishi
- Nissan
- Rolls Royce
- Toyota
- Volvo

#### I've Got Worldwide Gross Receipts of Over \$100,000,000, What Do I Do?

- **If Your Franchised Automaker Has a Disclosure on their Website:** Have the person or company who manages your website post a link on the homepage of your own website (and each individual dealer website, if you are a dealer group) to the factory website disclosure listed above (or elsewhere obtained), with the title of "California Supply Chains Act" or "California Supply

Chains Act Disclosure". While the location of this post is not specifically mandated, it should be somewhere where customers would expect to see similar disclosures, such as next to your website privacy policy.

- **If Your Franchised Automaker Does NOT Have a Disclosure on their Website:** Unless your dealership actually has in place steps to eradicate human trafficking and slavery from your supply chain, you'll need to effectively tell customers that you don't.
  - **Step One:** Put together a document outlining the steps you take to eradicate human trafficking and slavery from your supply chain. If, like most dealers, you do not take such steps, you may want to use our sample policy (below) as a starting point.
  - **Step Two:** Have the person or company who manages your website put your new disclosure on a separate page on your website. They should also post a link to the disclosure on the homepage of your own website (and each individual dealer website, if you are a dealer group), with the title of the link either "California Supply Chains Act" or "California Supply Chains Act Disclosure". While the location of this post is not specifically mandated, it should be somewhere where customers would expect to see similar disclosures, such as next to your website privacy policy.

#### California Transparency in Supply Chains Act Disclosure

WAYNE

Human trafficking and slavery continue to plague many places throughout the world, and [DEALER] supports efforts to eliminate such practices. Given that [DEALER] is franchised to sell [FACTORY] brand automobiles and parts that we purchase from [FACTORY], we rely upon the efforts of this automaker and its to eradicate human trafficking and slavery from their supply chain. Accordingly:

- We do not engage in verification of our product supply chains to evaluate and address risks of human trafficking and slavery.
- We do not conduct audits of suppliers to evaluate their compliance with company standards for trafficking and slavery in supply chains.
- We do not 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.
- We do not maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
- We do not provide company employees and management with training on human trafficking and slavery or mitigating risks within the supply chains of products.

Since the vast majority of goods and services we sell are from [FACTORY], only [FACTORY] is in a position to perform these tasks, and we encourage you to contact [FACTORY] at [FACTORY CONTACT NUMBER] to learn about their efforts to eradicate human trafficking and slavery from their supply chain.



## Appendix E: Disclosure compliance scores

This table first sorts companies by their disclosure compliance score, and then sorts them alphabetically.

Compliance points	Disclosing group	Disclosing entity	Compliance % score	Affirmative conduct % score	# "Working-on-it" items	Compliance / affirmative score divergence <sup>46</sup>
6.0	99¢ ONLY STORES	99¢ ONLY STORES	100%	20%	-	80%
6.0	ACS INDUSTRIES INC	ACS INDUSTRIES INC	100%	0%	-	100%
6.0	AEROPRES CORP	AEROPRES CORP	100%	0%	-	100%
6.0	AGRO-CULTURE LIQUID FERTILIZERS	AGRO-CULTURE LIQUID FERTILIZERS	100%	0%	-	100%
6.0	ALTEC INDUSTRIES INC	ALTEC INDUSTRIES INC	100%	0%	-	100%
6.0	ALTERA CORP	ALTERA CORP	100%	0%	-	100%
6.0	AMERICAN APPAREL INC	AMERICAN APPAREL INC	100%	90%	-	10%
6.0	AMERICAN BILTRITE INC	AMERICAN BILTRITE INC	100%	0%	-	100%
6.0	AMERICAN GREETINGS CORP	AMERICAN GREETINGS CORP	100%	80%	-	20%
6.0	AMERICAS STYRENICS LLC	AMERICAS STYRENICS LLC	100%	0%	5	20%
6.0	AQUATIC	AQUATIC	100%	0%	-	100%
6.0	ARIZONA CHEMICAL COMPANY LLC	ARIZONA CHEMICAL COMPANY LLC	100%	60%	-	40%
6.0	ASCENA RETAIL GROUP INC	ANN INC	100%	90%	-	10%
6.0	ASHLEY FURNITURE INDUSTRIES	ASHLEY FURNITURE INDUSTRIES	100%	80%	-	20%
6.0	ASO LLC	ASO LLC	100%	100%	-	0%
6.0	AXCELIS TECHNOLOGIES INC	AXCELIS TECHNOLOGIES INC	100%	30%	-	70%
6.0	B/E AEROSPACE INC	B/E AEROSPACE INC	100%	40%	-	60%
6.0	BAKEMARK USA LLC	BAKEMARK USA LLC	100%	0%	-	100%
6.0	BAKER COMMODITIES INC	BAKER COMMODITIES INC	100%	20%	-	80%
6.0	BARE ESSENTUALS INC	BARE ESSENTUALS INC	100%	70%	1	20%
6.0	BLYTH INC	EXPOSURES	100%	0%	-	100%

<sup>46</sup> In order to compare apples with apples, we disregard the link criteria (Criteria 1.A.) when calculating divergence between the compliance and the affirmative conduct, possibly resulting in a percentage point value in column "Compliance/ affirmative score divergence" that is not the difference between the "Compliance % score" and the "Affirmative conduct % score."





6.0	BLYTH INC	MILES KIMBALL	100%	0%	-	100%
6.0	BLYTH INC	WALTER DRAKE	100%	0%	-	100%
6.0	BMW CONCORD	BMW CONCORD	100%	0%	-	100%
6.0	BROOKS BROTHERS INC	BROOKS BROTHERS INC	100%	70%	-	30%
6.0	BROOKS SPORTS INC	BROOKS SPORTS INC	100%	90%	-	10%
6.0	BWAY INTERMEDIATE CO INC	BWAY INTERMEDIATE CO INC	100%	60%	-	40%
6.0	CALAMP CORP	CALAMP CORP	100%	60%	-	40%
6.0	CALIFORNIA EXPANDED METAL PRODUCTS CO	CALIFORNIA EXPANDED METAL PRODUCTS CO	100%	0%	-	100%
6.0	CALLAWAY GOLF CO	CALLAWAY GOLF CO	100%	90%	-	10%
6.0	CASCADE MICROTECH INC	CASCADE MICROTECH INC	100%	0%	-	100%
6.0	CHIQUITA BRANDS INTERNATIONAL INC	CHIQUITA BRANDS INTERNATIONAL INC	100%	80%	1	10%
6.0	CITI TRENDS INC	CITI TRENDS INC	100%	40%	-	60%
6.0	CLARCOR INC	CLARCOR INC	100%	0%	-	100%
6.0	CLEARWATER PAPER CORP	CLEARWATER PAPER CORP	100%	50%	2	20%
6.0	CLOROX CO	CLOROX CO	100%	90%	-	10%
6.0	CLOUGHERTY PACKING LLC	CLOUGHERTY PACKING LLC	100%	80%	-	20%
6.0	CLOVER STORNETTA FARMS INC	CLOVER STORNETTA FARMS INC	100%	40%	3	20%
6.0	CONTINENTAL MILLS INC	CONTINENTAL MILLS INC	100%	40%	1	40%
6.0	CORNING INC	CORNING INC	100%	20%	-	80%
6.0	COTY INC	COTY INC	100%	40%	-	60%
6.0	CP MANUFACTURING INC	CP MANUFACTURING INC	100%	0%	-	100%
6.0	CYNOSURE INC	CYNOSURE INC	100%	0%	-	100%
6.0	D&W FINE PACK LLC	D&W FINE PACK LLC	100%	0%	7	0%
6.0	DANSKO HOLDINGS INC	DANSKO HOLDINGS INC	100%	80%	-	20%
6.0	DARLING INGREDIENTS INC	DARLING INGREDIENTS INC	100%	20%	1	60%
6.0	DAYTON SUPERIOR	DAYTON SUPERIOR	100%	20%	-	80%
6.0	DELTA APPAREL INC	DELTA APPAREL INC	100%	60%	-	40%
6.0	DOMINO'S PIZZA INC	DOMINO'S PIZZA INC	100%	0%	-	100%
6.0	DOMTAR CORP	ASSOCIATED HYGIENIC PRODUCTS LLC	100%	80%	-	20%
6.0	DOUGLAS LABORATORIES	DOUGLAS LABORATORIES	100%	0%	-	100%
6.0	DOVER CORP	ENVIRONMENTAL	100%	40%	-	60%



		SOLUTIONS GROUP				
6.0	DREXEL CHEMICAL CO	DREXEL CHEMICAL CO	100%	30%	-	70%
6.0	EASTERN CO	EASTERN CO	100%	0%	-	100%
6.0	ECONOLITE GROUP INC	ECONOLITE GROUP INC	100%	0%	-	100%
6.0	EJ GROUP INC	EJ GROUP INC	100%	0%	-	100%
6.0	ELECTRONIC THEATRE CONTROLS INC	ELECTRONIC THEATRE CONTROLS INC	100%	0%	-	100%
6.0	ELMER'S PRODUCTS INC	ELMER'S PRODUCTS INC	100%	60%	1	20%
6.0	ENCORE WIRE CORP	ENCORE WIRE CORP	100%	20%	-	80%
6.0	ERGON INC	ERGON INC	100%	0%	-	100%
6.0	ESCO TECHNOLOGIES INC	ESCO TECHNOLOGIES INC	100%	0%	-	100%
6.0	FIRST CHOICE COFFEE SERVICES	FIRST CHOICE COFFEE SERVICES	100%	0%	-	100%
6.0	FLEXCON	FLEXCON	100%	0%	-	100%
6.0	FLIR SYSTEMS INC	FLIR SYSTEMS INC	100%	40%	1	40%
6.0	FOOTWEAR UNLIMITED INC	FOOTWEAR UNLIMITED INC	100%	0%	5	20%
6.0	FORT WAYNE METALS RESEARCH PRODUCTS CORP	FORT WAYNE METALS RESEARCH PRODUCTS CORP	100%	0%	3	40%
6.0	FOX FACTORY HOLDING CP	FOX FACTORY HOLDING CP	100%	0%	-	100%
6.0	FRANKLIN ELECTRIC CO INC	FRANKLIN ELECTRIC CO INC	100%	0%	-	100%
6.0	FREDERICK'S OF HOLLYWOOD GROUP INC	FREDERICK'S OF HOLLYWOOD GROUP INC	100%	60%	4	0%
6.0	FRONTIER SPINNING MILLS	FRONTIER SPINNING MILLS	100%	0%	-	100%
6.0	GOLD CREEK FOODS LLC	GOLD CREEK FOODS LLC	100%	0%	-	100%
6.0	GOPRO INC	GOPRO INC	100%	80%	-	20%
6.0	GRAHAM PACKAGING COMPANY	GRAHAM PACKAGING COMPANY	100%	80%	-	20%
6.0	GREIF INC	GREIF INC	100%	20%	-	80%
6.0	GROUP 1 AUTOMOTIVE INC	MERCEDES-BENZ OF ESCONDIDO	100%	0%	-	100%
6.0	GROUP 1 AUTOMOTIVE INC	VOLKSWAGEN OF KEARNY MESA	100%	0%	-	100%
6.0	GUARDIAN INDUSTRIES CORP	GUARDIAN INDUSTRIES CORP	100%	0%	-	100%
6.0	GUITAR CENTER INC	GUITAR CENTER INC	100%	100%	-	0%
6.0	GULF PACIFIC RICE CO	GULF PACIFIC RICE CO	100%	80%	-	20%
6.0	H.J. BAKER & BRO. INC	H.J. BAKER & BRO. INC	100%	0%	-	100%





6.0	HALF PRICE BOOKS	HALF PRICE BOOKS	100%	40%	-	60%
6.0	HATICON SOLAR	HATICON SOLAR	100%	20%	-	80%
6.0	HERSHEY CO	HERSHEY CO	100%	90%	-	10%
6.0	HONEYVILLE INC	HONEYVILLE INC	100%	20%	5	10%
6.0	ICL	FYRQUEL	100%	30%	2	30%
6.0	INEOS	INEOS	100%	0%	-	100%
6.0	INTERNATIONAL IMAGING MATERIALS INC	INTERNATIONAL IMAGING MATERIALS INC	100%	0%	-	100%
6.0	J. C. PENNEY	J. C. PENNEY COMPANY INC	100%	80%	-	20%
6.0	JAGUAR LAND ROVER ASTON MARTIN NEWPORT BEACH	ASTON MARTIN NEWPORT BEACH	100%	0%	-	100%
6.0	JAGUAR LAND ROVER ASTON MARTIN NEWPORT BEACH	JAGUAR NEWPORT BEACH	100%	0%	-	100%
6.0	JAGUAR MISSION VIEJO	JAGUAR MISSION VIEJO	100%	0%	-	100%
6.0	JOHN R. BURT ENTERPRISES	DURO-LAST ROOFING INC	100%	70%	-	30%
6.0	JOHN VARVATOS ENTERPRISES INC	JOHN VARVATOS ENTERPRISES INC	100%	70%	1	10%
6.0	JOS. A. BANK CLOTHIERS INC	JOS. A. BANK CLOTHIERS INC	100%	80%	-	20%
6.0	K.V. MART CO	K.V. MART CO	100%	80%	-	20%
6.0	KIK CUSTOM PRODUCTS INC	KIK CUSTOM PRODUCTS INC	100%	20%	1	60%
6.0	KOCH INDUSTRIES INC	KOCH INDUSTRIES INC	100%	40%	-	60%
6.0	KOMATSU LTD	KOMATSU LTD	100%	0%	-	100%
6.0	KRISPY KREME DOUGHNUTS INC	KRISPY KREME DOUGHNUTS INC	100%	0%	-	100%
6.0	KUNI ENTERPRISES INC	KUNI CHEVROLET CADILLAC	100%	0%	-	100%
6.0	KUNI ENTERPRISES INC	KUNI ENTERPRISES INC	100%	0%	-	100%
6.0	KW CONTAINER	KW CONTAINER	100%	30%	2	30%
6.0	L BRANDS INC	BATH & BODY WORKS DIRECT INC	100%	100%	-	0%
6.0	LA MESA RV	LA MESA RV	100%	0%	-	100%
6.0	LA-Z-BOY INC	LA-Z-BOY INC	100%	80%	-	20%
6.0	LEVI STRAUSS & CO	LEVI STRAUSS & CO	100%	90%	-	10%
6.0	LUCITE INTERNATIONAL	LUCITE INTERNATIONAL	100%	0%	-	100%
6.0	LULULEMON ATHLETICA INC	LULULEMON ATHLETICA INC	100%	90%	-	10%
6.0	LYONDELLBASELL	LYONDELLBASELL	100%	10%	-	90%



	<b>INDUSTRIES NV</b>	INDUSTRIES NV				
6.0	<b>MANSFIELD PLUMBING PRODUCTS LLC</b>	MANSFIELD PLUMBING PRODUCTS LLC	100%	0%	-	100%
6.0	<b>MARY KAY INC</b>	MARY KAY INC	100%	80%	-	20%
6.0	<b>MCGARD LLC</b>	MCGARD LLC	100%	0%	-	100%
6.0	<b>MERCK &amp; CO</b>	MERCK & CO	100%	50%	-	50%
6.0	<b>METAL EXCHANGE CORP</b>	METAL EXCHANGE CORP	100%	0%	-	100%
6.0	<b>MIDAS INTERNATIONAL CORP</b>	MIDAS INTERNATIONAL CORP	100%	0%	-	100%
6.0	<b>MITSUWA MARKETPLACE</b>	MITSUWA MARKETPLACE	100%	0%	4	30%
6.0	<b>MODINE MANUFACTURING CO</b>	MODINE MANUFACTURING CO	100%	50%	-	50%
6.0	<b>NAKASH ENTERPRISES LLC</b>	AU ENERGY	100%	0%	-	100%
6.0	<b>NAKASH ENTERPRISES LLC</b>	NAKASH ENTERPRISES LLC	100%	0%	-	100%
6.0	<b>NAKASH ENTERPRISES LLC</b>	VINTNERS DISTRIBUTORS	100%	0%	-	100%
6.0	<b>NEW CENTURY BMW</b>	NEW CENTURY BMW	100%	0%	-	100%
6.0	<b>NISSIN FOODS</b>	NISSIN FOODS	100%	80%	-	20%
6.0	<b>NORDSTROM INC</b>	NORDSTROM INC	100%	90%	-	10%
6.0	<b>NXSTAGE MEDICAL INC</b>	NXSTAGE MEDICAL INC	100%	80%	-	20%
6.0	<b>OKONITE</b>	OKONITE	100%	60%	-	40%
6.0	<b>ONE WORKPLACE</b>	ONE WORKPLACE	100%	0%	1	80%
6.0	<b>PACIFIC CHEESE CO INC</b>	PACIFIC CHEESE CO INC	100%	0%	-	100%
6.0	<b>PACIFIC SALES</b>	PACIFIC SALES	100%	40%	-	60%
6.0	<b>PALM SPRINGS MOTORS INC</b>	PALM SPRINGS HYUNDAI	100%	0%	-	100%
6.0	<b>PAR PHARMACEUTCL HLDGS -REDH</b>	PAR PHARMACEUTCL HLDGS -REDH	100%	0%	2	60%
6.0	<b>PATRIARCH PARTNERS LLC</b>	UNIVERSAL INSTRUMENTS CORP	100%	0%	-	100%
6.0	<b>PET CARE SYSTEMS INC</b>	PET CARE SYSTEMS INC	100%	0%	-	100%
6.0	<b>PET FOOD EXPRESS</b>	PET FOOD EXPRESS	100%	20%	1	60%
6.0	<b>POLYONE CORP</b>	POLYONE CORP	100%	0%	2	60%
6.0	<b>PROBUILD HOLDINGS LLC</b>	PROBUILD HOLDINGS LLC	100%	20%	-	80%
6.0	<b>PULMUONE FOODS USA INC</b>	PULMUONE FOODS USA INC	100%	60%	-	40%
6.0	<b>PVH CORP</b>	PVH CORP	100%	60%	1	20%
6.0	<b>QUIDEL CORP</b>	QUIDEL CORP	100%	100%	-	0%
6.0	<b>RAINBOW SHOPS</b>	RAINBOW SHOPS	100%	20%	-	80%
6.0	<b>RALEY'S FAMILY OF FINE STORES</b>	RALEY'S FAMILY OF FINE STORES	100%	30%	2	30%



6.0	RECREATIONAL EQUIPMENT INC	RECREATIONAL EQUIPMENT INC	100%	100%	-	0%
6.0	RED DIAMOND WINERY	RED DIAMOND WINERY	100%	0%	-	100%
6.0	REGAL BELOIT CORP	REGAL BELOIT CORP	100%	20%	-	80%
6.0	RITZ & WOLF CAMERA & IMAGE	RITZ & WOLF CAMERA & IMAGE	100%	50%	-	50%
6.0	RIVERSIDE AUTO CENTER	BMW OF RIVERSIDE	100%	0%	-	100%
6.0	RIVERSIDE AUTO CENTER	INFINITI OF RIVERSIDE	100%	0%	-	100%
6.0	ROCHE HOLDING AG	VENTANA MEDICAL SYSTEMS INC	100%	40%	2	20%
6.0	ROSEBURG FOREST PRODUCTS CO	ROSEBURG FOREST PRODUCTS CO	100%	0%	-	100%
6.0	ROSLAND CAPITAL LLC	ROSLAND CAPITAL LLC	100%	0%	-	100%
6.0	RUDOLPH TECHNOLOGIES INC	RUDOLPH TECHNOLOGIES INC	100%	40%	1	40%
6.0	RUMIANO CHEESE CO	RUMIANO CHEESE CO	100%	0%	-	100%
6.0	SARGENTO FOODS INC	SARGENTO FOODS INC	100%	0%	-	100%
6.0	SAVE MART SUPERMARKETS	SAVE MART SUPERMARKETS	100%	0%	-	100%
6.0	SHERWIN-WILLIAMS	SHERWIN-WILLIAMS	100%	0%	-	100%
6.0	SHUTTERFLY INC	SHUTTERFLY INC	100%	60%	1	20%
6.0	SIKA	SIKA CORP	100%	30%	2	30%
6.0	SNAK KING	SNAK KING	100%	0%	-	100%
6.0	SNAP-ON INC	SNAP-ON INC	100%	40%	-	60%
6.0	SOHNEN ENTERPRISES INC	SOHNEN ENTERPRISES INC	100%	0%	-	100%
6.0	SPROUTS FARMERS MARKET	SPROUTS FARMERS MARKET	100%	50%	2	10%
6.0	ST JUDE MEDICAL INC	ST JUDE MEDICAL INC	100%	20%	3	30%
6.0	STEELCASE INC	STEELCASE INC	100%	60%	-	40%
6.0	STERLING MOTORS LTD	STERLING MOTORS LTD	100%	0%	-	100%
6.0	STRYKER	STRYKER	100%	50%	-	50%
6.0	STUART WEITZMAN HOLDINGS LLC	STUART WEITZMAN HOLDINGS LLC	100%	90%	-	10%
6.0	SUN-MAID GROWERS OF CALIFORNIA	SUN-MAID GROWERS OF CALIFORNIA	100%	100%	-	0%
6.0	SUPER CENTER CONCEPTS INC	SUPER CENTER CONCEPTS INC	100%	20%	-	80%
6.0	SUPERVALU INC	SUPERVALU INC	100%	0%	-	100%
6.0	TECHNIMARK LLC	TECHNIMARK LLC	100%	70%	-	30%
6.0	TEXTRON INC	BB BUGGIES INC	100%	0%	-	100%
6.0	TEXTRON INC	CUSHMAN	100%	0%	-	100%
6.0	TEXTRON INC	JACOBSEN DIVISION OF	100%	0%	-	100%



		TEXTRON				
6.0	TEXTRON INC	TEXTRON AVIATION	100%	0%	-	100%
6.0	TEXTRON INC	TEXTRON INC	100%	0%	-	100%
6.0	THE FISHER BARTON GROUP	FISHER BARTON	100%	0%	-	100%
6.0	THE FISHER BARTON GROUP	KNIFE-XPRESS	100%	0%	-	100%
6.0	THE FISHER BARTON GROUP	ZENITH CUTTER	100%	0%	-	100%
6.0	THORATEC CORP	THORATEC CORP	100%	70%	-	30%
6.0	TOYOTA OF GLENDALE	TOYOTA OF GLENDALE	100%	0%	-	100%
6.0	TRAVELCENTERS OF AMERICA LLC	TRAVELCENTERS OF AMERICA LLC	100%	0%	-	100%
6.0	TREX CO INC	TREX CO INC	100%	20%	-	80%
6.0	TRINSEO SA	TRINSEO SA	100%	50%	-	50%
6.0	TRUE RELIGION BRAND JEANS	TRUE RELIGION BRAND JEANS	100%	90%	1	0%
6.0	TUMI HOLDINGS INC	TUMI HOLDINGS INC	100%	80%	-	20%
6.0	UNITED NATURAL FOODS INC	UNITED NATURAL FOODS INC	100%	80%	-	20%
6.0	UNIVERSAL FOREST PRODS INC	UNIVERSAL FOREST PRODS INC	100%	40%	-	60%
6.0	US AUTO PARTS NETWORK INC	AUTO PARTS WAREHOUSE	100%	20%	1	60%
6.0	US AUTO PARTS NETWORK INC	US AUTO PARTS NETWORK INC	100%	20%	1	60%
6.0	US OIL & REFINING CO	US OIL & REFINING CO	100%	0%	-	100%
6.0	VALSPAR CORP	QUEST AUTOMOTIVE PRODUCTS	100%	0%	-	100%
6.0	VALSPAR CORP	QUEST INDUSTRIAL PRODUCTS	100%	0%	-	100%
6.0	VECTOR GROUP LTD	VECTOR GROUP LTD	100%	20%	-	80%
6.0	VERA BRADLEY INC	VERA BRADLEY INC	100%	70%	1	10%
6.0	VERSO CORP	VERSO CORP	100%	30%	-	70%
6.0	VIRCO MFG. CORP	VIRCO MFG. CORP	100%	20%	-	80%
6.0	VISKASE COMPANIES INC	VISKASE COMPANIES INC	100%	10%	1	70%
6.0	WATTS WATER TECHNOLOGIES INC	WATTS WATER TECHNOLOGIES INC	100%	0%	-	100%
6.0	WAUSAU PAPER CORP	WAUSAU PAPER CORP	100%	0%	-	100%
6.0	WD-40 CO	WD-40 CO	100%	50%	4	0%
6.0	WESTERN REFINING INC	WESTERN REFINING INC	100%	20%	-	80%
6.0	WHOLE FOODS MARKET INC	WHOLE FOODS MARKET INC	100%	70%	-	30%
6.0	WL GORE &	WL GORE &	100%	60%	-	40%



	ASSOCIATES	ASSOCIATES				
6.0	XERIUM TECHNOLOGIES INC	XERIUM TECHNOLOGIES INC	100%	0%	-	100%
5.5	ACCELLA PERFORMANCE MATERIALS INC	ACCELLA PERFORMANCE MATERIALS INC	92%	0%	-	90%
5.5	ALAMO GROUP INC	ALAMO GROUP INC	92%	0%	-	90%
5.5	ALTRIA GROUP INC	ANEW WINERY	92%	40%	-	50%
5.5	ALTRIA GROUP INC	SEVEN FALLS CELLARS	92%	40%	-	50%
5.5	AVON PRODUCTS	AVON PRODUCTS	92%	90%	-	0%
5.5	BELL AND HOWELL LLC	BELL AND HOWELL LLC	92%	0%	1	70%
5.5	BIG 5 SPORTING GOODS CORP	BIG 5 SPORTING GOODS CORP	92%	80%	-	10%
5.5	BIMBO BAKERIES USA	BIMBO BAKERIES USA	92%	80%	-	10%
5.5	BINSWANGER GLASS	BINSWANGER GLASS	92%	0%	-	90%
5.5	BJ'S WHOLESALE CLUB INC	BJ'S OPTICAL	92%	60%	-	30%
5.5	BOURNS INC	BOURNS INC	92%	20%	-	70%
5.5	BRUNSWICK CORP	BRUNSWICK CORP	92%	30%	-	60%
5.5	CACIQUE INC	CACIQUE INC	92%	40%	2	10%
5.5	CHARLOTTE RUSSE INC	CHARLOTTE RUSSE INC	92%	90%	-	0%
5.5	DILLARD'S INC	DILLARD'S INC	92%	90%	-	0%
5.5	DOLLAR GENERAL	DOLLAR GENERAL	92%	80%	-	10%
5.5	DONNA KARAN COMPANY LLC	DONNA KARAN COMPANY LLC	92%	90%	-	0%
5.5	DSW INC	DSW INC	92%	70%	1	0%
5.5	ENPRO INDUSTRIES INC	ENPRO INDUSTRIES INC	92%	20%	-	70%
5.5	FOLLETT CORP	FOLLETT CORP	92%	10%	5	0%
5.5	FOREVER 21	FOREVER 21	92%	80%	-	10%
5.5	GBP	GBP	92%	70%	-	20%
5.5	GENERAL MOTORS COMPANY	GENERAL MOTORS COMPANY	92%	70%	-	20%
5.5	GLEN RAVEN INC	GLEN RAVEN INC	92%	10%	3	20%
5.5	IPS CORP	IPS CORP	92%	90%	-	0%
5.5	IPS CORP	WELD-ON ADHESIVES INC	92%	90%	-	0%
5.5	J. C. PENNEY	JC PENNY OPTICAL	92%	60%	-	30%
5.5	J+J FLOORING GROUP	J+J FLOORING GROUP	92%	80%	-	10%
5.5	KAREN KANE INC	KAREN KANE INC	92%	90%	-	0%
5.5	KYOCERA CORP	KYOCERA CORP	92%	10%	-	80%
5.5	LANCASTER COLONY CORP	LANCASTER COLONY CORP	92%	20%	-	70%
5.5	LITHIA MOTORS INC	LITHIA MOTORS INC	92%	0%	-	90%
5.5	LUMBER LIQUIDATORS HLDGS INC	LUMBER LIQUIDATORS HLDGS INC	92%	80%	-	10%



5.5	LVMH	BENEFIT COSMETICS LLC	92%	40%	2	10%
5.5	MANHATTAN BEACHWEAR INC	MANHATTAN BEACHWEAR INC	92%	70%	1	0%
5.5	MERISANT US INC	MERISANT US INC	92%	20%	-	70%
5.5	MOTTO WINES	MOTTO WINES	92%	0%	-	90%
5.5	NEWELL RUBBERMAID INC	NEWELL RUBBERMAID INC	92%	70%	-	20%
5.5	OVERSTOCK.COM INC	OVERSTOCK.COM INC	92%	50%	-	40%
5.5	PACIFIC FOODS OF OREGON INC	PACIFIC FOODS OF OREGON INC	92%	80%	1	0%
5.5	PANERA BREAD CO	PANERA BREAD CO	92%	10%	-	80%
5.5	PRANA	PRANA	92%	80%	-	10%
5.5	PREFORMED LINE PRODUCTS CO	PREFORMED LINE PRODUCTS CO	92%	40%	2	10%
5.5	RALPH LAUREN CORP	CHAPS	92%	90%	-	0%
5.5	RALPH LAUREN CORP	CLUB MONACO CORP	92%	90%	-	0%
5.5	RALPH LAUREN CORP	RALPH LAUREN CORP	92%	90%	-	0%
5.5	SANDISK CORP	SANDISK CORP	92%	80%	-	10%
5.5	SPYDER ACTIVE SPORTS INC	SPYDER ACTIVE SPORTS INC	92%	0%	5	10%
5.5	THE FRESH MARKET INC	THE FRESH MARKET INC	92%	20%	-	70%
5.5	U.S. VISION	U.S. VISION	92%	60%	-	30%
5.5	VF CORP	TIMBERLAND	92%	80%	-	10%
5.5	VOLCANO CORP	VOLCANO CORP	92%	90%	-	0%
5.5	VOLCOM INC	VOLCOM INC	92%	90%	-	0%
5.5	WALDO'S	WALDO'S	92%	90%	-	0%
5.5	WINTECH INDUSTRIES INC	WINTECH INDUSTRIES INC	92%	70%	-	20%
5.0	AARON'S INC	AARON'S INC	83%	0%	2	40%
5.0	ABBOTT LABORATORIES	ABBOTT LABORATORIES	83%	70%	-	30%
5.0	ACCO BRANDS CORP	ACCO BRANDS CORP	83%	80%	-	20%
5.0	ACERINOX	NORTH AMERICAN STAINLESS	83%	10%	-	90%
5.0	ACUMENT INTELLECTUAL PROPERTIES LLC	ACUMENT INTELLECTUAL PROPERTIES LLC	83%	20%	-	60%
5.0	AÉROPOSTALE INC	AÉROPOSTALE INC	83%	80%	-	20%
5.0	AETHERCOMM INC	AETHERCOMM INC	83%	40%	1	20%
5.0	AIRAID	AIRAID	83%	60%	-	20%
5.0	ALLEGHENY TECHNOLOGIES INC	ALLEGHENY TECHNOLOGIES INC	83%	0%	-	100%
5.0	ALTRIA GROUP INC	ALTRIA GROUP INC	83%	50%	-	50%
5.0	AMERICAN & EFIRD LLC	AMERICAN & EFIRD LLC	83%	70%	-	10%





5.0	AMERICAN EAGLE OUTFITTERS	AMERICAN EAGLE OUTFITTERS	83%	50%	-	30%
5.0	APPLE INC	APPLE INC	83%	60%	-	20%
5.0	ARCELORMITTAL SA	ARCELORMITTAL SA	83%	20%	4	30%
5.0	ARDAGH	ARDAGH	83%	20%	-	80%
5.0	ASCENA RETAIL GROUP INC	DRESS BARN INC	83%	80%	-	0%
5.0	ATMEL CORP	ATMEL CORP	83%	40%	2	30%
5.0	AUTODESK INC	AUTODESK INC	83%	70%	-	30%
5.0	BAKER HUGHES	BAKER HUGHES	83%	60%	1	20%
5.0	BALCHEM CORP	BALCHEM CORP	83%	0%	-	80%
5.0	BASS PRO SHOPS	BASS PRO SHOPS	83%	50%	1	10%
5.0	BEACHBODY LLC	BEACHBODY LLC	83%	70%	-	10%
5.0	BENJAMIN MOORE & CO	BENJAMIN MOORE & CO	83%	0%	3	20%
5.0	BERKSHIRE HATHAWAY	FOREST RIVER INC	83%	0%	-	100%
5.0	BLYTH INC	AS WE CHANGE	83%	0%	-	80%
5.0	BLYTH INC	EASY COMFORTS	83%	0%	-	80%
5.0	BOISE CASCADE CO	BOISE CASCADE CO	83%	0%	-	80%
5.0	BON-TON STORES INC	BON-TON STORES INC	83%	70%	-	10%
5.0	BRANDT CONSOLIDATED INC	BRANDT CONSOLIDATED INC	83%	70%	-	10%
5.0	BRISTOL FARMS	BRISTOL FARMS	83%	60%	-	20%
5.0	BRISTOL FARMS	LAZY ACRES MARKET	83%	60%	-	20%
5.0	BROADCOM CORP	BROADCOM CORP	83%	100%	-	0%
5.0	BUCKLE INC	BUCKLE INC	83%	80%	-	0%
5.0	BUILD-A-BEAR WORKSHOP INC	BUILD-A-BEAR WORKSHOP INC	83%	80%	-	20%
5.0	BURBERRY GROUP PLC	BURBERRY GROUP PLC	83%	100%	-	0%
5.0	CABOT CORP	CABOT CORP	83%	50%	-	30%
5.0	CALIFORNIA STEEL INDUSTRIES INC	CALIFORNIA STEEL INDUSTRIES INC	83%	0%	-	80%
5.0	CARAUSTAR INDUSTRIES INC	CARAUSTAR INDUSTRIES INC	83%	0%	-	80%
5.0	CARDINAL GLASS INDUSTRIES INC	CARDINAL GLASS INDUSTRIES INC	83%	0%	-	80%
5.0	CARLISLE COS INC	CARLISLE COS INC	83%	20%	-	80%
5.0	CARLSEN MOTOR CARS INC	CARLSEN PORSCHE	83%	0%	-	100%
5.0	CASUAL GOURMET SAUSAGE	CASUAL GOURMET SAUSAGE	83%	60%	-	20%
5.0	CATERPILLAR INC	CATERPILLAR INC	83%	0%	-	100%
5.0	CELL SIGNALING TECHNOLOGY	CELL SIGNALING TECHNOLOGY	83%	0%	2	80%





5.0	CENTER BMW	CENTER BMW	83%	0%	-	100%
5.0	CENTRAL GARDEN & PET COMPANY	CENTRAL GARDEN & PET COMPANY	83%	90%	-	10%
5.0	CG ROXANE LLC	CG ROXANE LLC	83%	60%	-	20%
5.0	CHEVRON PHILLIPS CHEMICAL	CHEVRON PHILLIPS CHEMICAL	83%	50%	1	20%
5.0	CLA-VAL	CLA-VAL	83%	0%	-	100%
5.0	CLEAN COAL GROUP	CLEAN COAL GROUP	83%	0%	-	100%
5.0	COLFAX CORP	COLFAX CORP	83%	40%	-	60%
5.0	COLONY BRANDS INC	COLONY BRANDS INC	83%	60%	-	20%
5.0	CRANE CO	CRANE CO	83%	40%	-	40%
5.0	CST BRANDS INC	CORNER STONE	83%	20%	-	60%
5.0	DELPHI AUTOMOTIVE PLC	DELPHI AUTOMOTIVE PLC	83%	50%	-	30%
5.0	DESTINATION MATERNITY CORP	DESTINATION MATERNITY CORP	83%	70%	-	10%
5.0	DESTINATION XL GROUP INC	DESTINATION XL GROUP INC	83%	90%	-	10%
5.0	DIAMOND FOODS INC	DIAMOND FOODS INC	83%	100%	-	0%
5.0	DICK'S SPORTING GOODS INC	DICK'S SPORTING GOODS INC	83%	80%	-	0%
5.0	DIEBOLD INC	DIEBOLD INC	83%	20%	4	0%
5.0	DIXON VALVE & COUPLING	DIXON VALVE & COUPLING	83%	10%	-	90%
5.0	DJO GLOBAL	DJO GLOBAL	83%	90%	-	10%
5.0	DOMTAR CORP	DOMTAR CORP	83%	90%	-	10%
5.0	DONNELLEY (R R) & SONS CO	DONNELLEY (R R) & SONS CO	83%	0%	-	100%
5.0	DOVER CORP	COLDER PRODUCTS CO	83%	40%	-	60%
5.0	DST SYSTEMS INC	DST SYSTEMS INC	83%	80%	-	20%
5.0	E. & J. GALLO WINERY	GALILEO FOODS	83%	60%	-	20%
5.0	E. & J. GALLO WINERY	GALLO FOODS	83%	60%	-	20%
5.0	EDUCATIONAL PRODUCTS INC	EDUCATIONAL PRODUCTS INC	83%	0%	2	40%
5.0	EILEEN FISHER INC	EILEEN FISHER INC	83%	100%	-	0%
5.0	EMCORE CORP	EMCORE CORP	83%	20%	-	60%
5.0	EMERALD PERFORMANCE MATERIALS	EMERALD PERFORMANCE MATERIALS	83%	50%	-	30%
5.0	EMPIRE TODAY LLC	EMPIRE TODAY LLC	83%	20%	-	60%
5.0	ENPHASE ENERGY INC	ENPHASE ENERGY INC	83%	20%	-	80%
5.0	ESCALADE INC	ESCALADE INC	83%	80%	-	20%
5.0	EXTRON ELECTRONICS	EXTRON ELECTRONICS	83%	70%	-	10%
5.0	FARIBAULT FOODS INC	FARIBAULT FOODS INC	83%	50%	-	30%
5.0	FARWEST STEEL CORP	FARWEST STEEL CORP	83%	30%	-	50%



5.0	<b>FEDERAL SIGNAL CORP</b>	FEDERAL SIGNAL CORP	83%	0%	-	100%
5.0	<b>FENDI</b>	FENDI	83%	70%	-	10%
5.0	<b>FETZER VINEYARDS</b>	1000 STORIES WINES	83%	20%	-	60%
5.0	<b>FORD METER BOX COMPANY INC</b>	FORD METER BOX COMPANY INC	83%	0%	-	80%
5.0	<b>FORT DEARBORN COMPANY</b>	FORT DEARBORN COMPANY	83%	70%	-	10%
5.0	<b>FREESCALE SEMICONDUCTOR LTD</b>	FREESCALE SEMICONDUCTOR LTD	83%	50%	1	40%
5.0	<b>FRUIT GROWERS SUPPLY COMPANY</b>	FRUIT GROWERS SUPPLY COMPANY	83%	0%	5	0%
5.0	<b>FULLBEAUTY BRANDS LP</b>	FULLBEAUTY BRANDS LP	83%	70%	-	10%
5.0	<b>FUSIONZONE AUTOMOTIVE INC</b>	CLAREMONT SCION	83%	0%	-	100%
5.0	<b>FUSIONZONE AUTOMOTIVE INC</b>	CLAREMONT TOYOTA	83%	0%	-	100%
5.0	<b>GAP INC</b>	GAP INC	83%	100%	-	0%
5.0	<b>GAP INC</b>	INTERMIX	83%	80%	-	0%
5.0	<b>GENERAC HOLDINGS INC</b>	GENERAC HOLDINGS INC	83%	40%	-	60%
5.0	<b>GEORGIA-PACIFIC LLC</b>	GEORGIA-PACIFIC LLC	83%	50%	-	30%
5.0	<b>GILDAN ACTIVEWEAR INC</b>	ANVIL	83%	70%	-	30%
5.0	<b>GILDAN ACTIVEWEAR INC</b>	GILDAN ACTIVEWEAR INC	83%	70%	-	30%
5.0	<b>GORMAN-RUPP CO</b>	GORMAN-RUPP CO	83%	20%	-	80%
5.0	<b>GRIFOLS SA</b>	GRIFOLS SA	83%	60%	1	20%
5.0	<b>GUITAR CENTER INC</b>	MUSICIAN'S FRIEND INC	83%	100%	-	0%
5.0	<b>HADDAD DODGE KIA</b>	HADDAD DODGE KIA	83%	0%	-	100%
5.0	<b>HAGGAR CLOTHING CO</b>	HAGGAR CLOTHING CO	83%	100%	-	0%
5.0	<b>HAIN CELESTIAL GROUP INC</b>	HAIN CELESTIAL GROUP INC	83%	60%	-	20%
5.0	<b>HANESBRANDS INC</b>	GEAR FOR SPORTS	83%	70%	-	10%
5.0	<b>HANESBRANDS INC</b>	HANESBRANDS INC	83%	70%	-	10%
5.0	<b>HARBOR FREIGHT TOOLS USA INC</b>	HARBOR FREIGHT TOOLS USA INC	83%	60%	-	20%
5.0	<b>HARMONIC INC</b>	HARMONIC INC	83%	80%	-	20%
5.0	<b>HEWLETT-PACKARD COMPANY</b>	HEWLETT-PACKARD COMPANY	83%	90%	-	10%
5.0	<b>HM ELECTRONICS INC</b>	HM ELECTRONICS INC	83%	70%	-	10%
5.0	<b>HOFFMASTER GROUP INC</b>	GRAPHIC MANAGEMENT SPECIALTY PRODUCTS	83%	100%	-	0%
5.0	<b>HOFFMASTER GROUP INC</b>	HOFFMASTER	83%	100%	-	0%



5.0	HOFFMASTER GROUP INC	HOFFMASTER GROUP INC	83%	100%	-	0%
5.0	HOME DEPOT	HOME DEPOT	83%	80%	-	0%
5.0	HOME MERIDIAN HOLDINGS INC	HOME MERIDIAN HOLDINGS INC	83%	40%	-	40%
5.0	HUDSON GROUP	HUDSON GROUP	83%	0%	3	40%
5.0	HUNTER INDUSTRIES	HUNTER INDUSTRIES	83%	40%	-	40%
5.0	HUSQVARNA GROUP	HUSQVARNA GROUP	83%	60%	-	20%
5.0	IDEAL INDUSTRIES INC	IDEAL INDUSTRIES INC	83%	50%	-	30%
5.0	IDEX CORP	IDEX CORP	83%	0%	-	100%
5.0	IGLOO PRODUCTS CORP	IGLOO PRODUCTS CORP	83%	40%	-	40%
5.0	INDIUM CORP	INDIUM CORP	83%	70%	-	10%
5.0	INFINERA CORP	INFINERA CORP	83%	60%	-	20%
5.0	INPHI CORP	INPHI CORP	83%	10%	-	90%
5.0	INSULET CORP	INSULET CORP	83%	0%	5	0%
5.0	INTEGRATED SILICON SOLUTION INC	INTEGRATED SILICON SOLUTION INC	83%	0%	-	100%
5.0	J.CREW GROUP INC	J.CREW	83%	80%	-	0%
5.0	J.CREW GROUP INC	MADEWELL	83%	80%	-	0%
5.0	JOERNS HEALTHCARE LLC	JOERNS HEALTHCARE LLC	83%	60%	-	20%
5.0	JOHN BEAN TECHNOLOGIES	JOHN BEAN TECHNOLOGIES	83%	0%	-	80%
5.0	JOHNSON MATTHEY	JOHNSON MATTHEY	83%	0%	-	100%
5.0	JONS INTERNATIONAL MARKETPLACE	JONS INTERNATIONAL MARKETPLACE	83%	0%	-	100%
5.0	JUSTFAB INC	JUSTFAB INC	83%	80%	-	0%
5.0	K&N ENGINEERING	K&N ENGINEERING	83%	40%	-	40%
5.0	KELLY-MOORE PAINT COMPANY INC	KELLY-MOORE PAINT COMPANY INC	83%	60%	-	20%
5.0	KENT NUTRITION GROUP INC	KENT NUTRITION GROUP INC	83%	0%	-	100%
5.0	KEYES MOTORS INC	KEYES HYUNDAI	83%	0%	-	100%
5.0	KEYES MOTORS INC	KEYES MISSION HILLS HYUNDAI	83%	0%	-	100%
5.0	KEYES MOTORS INC	KEYES WOODLAND HILLS HYUNDAI	83%	0%	-	100%
5.0	KING'S HAWAIIAN HOLDING CO INC	KING'S HAWAIIAN HOLDING CO INC	83%	20%	4	0%
5.0	KNAUF	KNAUF INSULATION LLC	83%	0%	1	60%
5.0	KOHL'S CORP	KOHL'S CORP	83%	100%	-	0%
5.0	KRATON PERFORMANCE POLYMERS	KRATON PERFORMANCE POLYMERS	83%	0%	-	100%
5.0	L BRANDS INC	L BRANDS INC	83%	100%	-	0%



5.0	LEAR CORP	LEAR CORP	83%	40%	-	40%
5.0	LEHIGH HANSON INC	LEHIGH HANSON INC	83%	70%	-	30%
5.0	LIBERTY TRIPADVISOR HOLDINGS INC	BUYSEASONS INC	83%	50%	-	30%
5.0	LIVANOVA PLC	SORIN GROUP	83%	0%	-	80%
5.0	LOCKHEED MARTIN CORP	LOCKHEED MARTIN CORP	83%	50%	-	50%
5.0	LUNDBERG FAMILY FARMS	LUNDBERG FAMILY FARMS	83%	20%	-	60%
5.0	LVMH	MARC JACOBS INTERNATIONAL LLC	83%	80%	-	0%
5.0	MANITOWOC CO	MANITOWOC CO	83%	10%	-	90%
5.0	MASCO CORP	BEHR PROCESS CORP	83%	60%	-	20%
5.0	MASCO CORP	BRASSCRAFT MFG	83%	60%	-	20%
5.0	MASCO CORP	DELTA FAUCET CO	83%	60%	-	20%
5.0	MASCO CORP	HOT SPRING	83%	60%	-	20%
5.0	MASCO CORP	KILZ CORP	83%	60%	-	20%
5.0	MASCO CORP	KRAFTMAID	83%	60%	-	20%
5.0	MASCO CORP	LIBERTY HARDWARE MFG CORP	83%	60%	-	20%
5.0	MASCO CORP	MASCO CABINETRY LLC	83%	60%	-	20%
5.0	MASCO CORP	MASCO CORP	83%	60%	-	20%
5.0	MASCO CORP	MERILLAT	83%	60%	-	20%
5.0	MASCO CORP	MILGARD MANUFACTURING INC	83%	60%	-	20%
5.0	MASCO CORP	WATKINS MANUFACTURING	83%	60%	-	20%
5.0	MATERNE NORTH AMERICA	MATERNE NORTH AMERICA	83%	0%	5	0%
5.0	MC ASSEMBLY	MC ASSEMBLY	83%	20%	-	60%
5.0	MCKENNA CARS	MCKENNA CARS	83%	0%	-	100%
5.0	MCWANE INC	AMEREX-FIRE	83%	40%	-	40%
5.0	MCWANE INC	MCWANE INC	83%	40%	-	40%
5.0	MEAD JOHNSON NUTRITION CO	ENFAMIL	83%	80%	-	0%
5.0	MEAD JOHNSON NUTRITION CO	MEAD JOHNSON NUTRITION CO	83%	80%	-	0%
5.0	MENS WEARHOUSE INC	K&G FASHION SUPERSTORE	83%	80%	-	0%
5.0	MENS WEARHOUSE INC	MENS WEARHOUSE INC	83%	60%	-	20%
5.0	MICHELIN NORTH AMERICA INC	MICHELIN NORTH AMERICA INC	83%	40%	-	40%
5.0	MILBANK MANUFACTURING CO	MILBANK MANUFACTURING CO	83%	20%	-	60%
5.0	MILESTONE AV	MILESTONE AV	83%	50%	1	10%



	<b>TECHNOLOGIES LLC</b>	TECHNOLOGIES LLC				
<b>5.0</b>	<b>MINERALS TECHNOLOGIES INC</b>	MINERALS TECHNOLOGIES INC	83%	80%	-	0%
<b>5.0</b>	<b>MINI OF CONCORD</b>	MINI OF CONCORD	83%	0%	-	100%
<b>5.0</b>	<b>MITSUBISHI</b>	MITSUBISHI CEMENT CORP	83%	0%	5	0%
<b>5.0</b>	<b>MOLEX INC</b>	MOLEX INC	83%	50%	-	30%
<b>5.0</b>	<b>MOMENTIVE PERFORMANCE MATLS</b>	MOMENTIVE PERFORMANCE MATLS	83%	20%	1	60%
<b>5.0</b>	<b>MOOG INC</b>	MOOG INC	83%	50%	-	50%
<b>5.0</b>	<b>MTS SYSTEMS CORP</b>	MTS SYSTEMS CORP	83%	50%	-	50%
<b>5.0</b>	<b>NATIONAL PRESTO INDS INC</b>	NATIONAL PRESTO INDS INC	83%	0%	1	80%
<b>5.0</b>	<b>NEENAH PAPER INC</b>	NEENAH PAPER INC	83%	90%	-	10%
<b>5.0</b>	<b>NEW HAMPSHIRE BALL BEARINGS INC</b>	NEW HAMPSHIRE BALL BEARINGS INC	83%	0%	-	80%
<b>5.0</b>	<b>NEW YORK &amp; CO INC</b>	NEW YORK & CO INC	83%	80%	-	0%
<b>5.0</b>	<b>NEWPORT CORP</b>	NEWPORT CORP	83%	20%	-	60%
<b>5.0</b>	<b>NORBORD INC</b>	NORBORD INC	83%	20%	-	60%
<b>5.0</b>	<b>NORDSON CORP</b>	NORDSON CORP	83%	50%	-	30%
<b>5.0</b>	<b>NUTRACEUTICAL INTL CORP</b>	NUTRACEUTICAL INTL CORP	83%	80%	-	20%
<b>5.0</b>	<b>ORCHARD SUPPLY HARDWARE STORES CORP</b>	ORCHARD SUPPLY HARDWARE STORES CORP	83%	0%	5	0%
<b>5.0</b>	<b>ORORA NORTH AMERICA</b>	ORORA NORTH AMERICA	83%	0%	-	100%
<b>5.0</b>	<b>OUTERWALL INC</b>	OUTERWALL INC	83%	70%	-	10%
<b>5.0</b>	<b>OVERHILL FARMS INC</b>	OVERHILL FARMS INC	83%	0%	-	100%
<b>5.0</b>	<b>OWENS-ILLINOIS INC</b>	OWENS-ILLINOIS INC	83%	10%	-	70%
<b>5.0</b>	<b>PACIFIC COAST PRODUCERS</b>	PACIFIC COAST PRODUCERS	83%	40%	-	60%
<b>5.0</b>	<b>PATAGONIA INC</b>	PATAGONIA INC	83%	80%	-	0%
<b>5.0</b>	<b>PERRY ELLIS INTERNATIONAL INC</b>	PERRY ELLIS INTERNATIONAL INC	83%	70%	-	10%
<b>5.0</b>	<b>PERRY ELLIS INTERNATIONAL INC</b>	RAFAELLA	83%	70%	-	10%
<b>5.0</b>	<b>PETSMART INC</b>	PETSMART INC	83%	70%	-	10%
<b>5.0</b>	<b>PINNACLE AGRICULTURE HOLDINGS LLC</b>	PINNACLE AGRICULTURE HOLDINGS LLC	83%	30%	-	50%
<b>5.0</b>	<b>PMC-SIERRA INC</b>	PMC-SIERRA INC	83%	60%	-	40%
<b>5.0</b>	<b>PQ CORP</b>	PQ CORP	83%	50%	1	30%
<b>5.0</b>	<b>PUBLISHERS CIRCULATION FULFILLMENT INC</b>	PUBLISHERS CIRCULATION FULFILLMENT INC	83%	40%	-	40%



5.0	QAD INC	QAD INC	83%	40%	-	60%
5.0	QEP CO INC	QEP CO INC	83%	80%	-	20%
5.0	QUANTUM DESIGN INC	QUANTUM DESIGN INC	83%	0%	-	100%
5.0	RAIN BIRD CORP	RAIN BIRD CORP	83%	60%	-	20%
5.0	RESMED INC	RESMED INC	83%	80%	-	20%
5.0	REXNORD CORP	REXNORD CORP	83%	0%	-	100%
5.0	RICOH CO LTD	RICOH ELECTRONICS INC	83%	40%	-	40%
5.0	ROBINSON HELICOPTER COMPANY INC	ROBINSON HELICOPTER COMPANY INC	83%	0%	1	80%
5.0	RPM INTERNATIONAL INC	DAP PRODUCTS INC	83%	40%	1	20%
5.0	RTI SURGICAL INC	RTI SURGICAL INC	83%	0%	-	100%
5.0	SALLY BEAUTY HOLDINGS INC	SALLY BEAUTY HOLDINGS INC	83%	50%	-	50%
5.0	SCAPA	SCAPA	83%	50%	-	50%
5.0	SEARS HOMETOWN & OUTLET STR	SEARS HOMETOWN & OUTLET STR	83%	40%	1	20%
5.0	SEPHORA USA INC	SEPHORA USA INC	83%	0%	-	80%
5.0	SHELL	ROYAL DUTCH SHELL PLC	83%	50%	-	30%
5.0	SIGMATRON INTERNATIONAL INC	SIGMATRON INTERNATIONAL INC	83%	0%	-	100%
5.0	SILVER SPRING NETWORKS INC	SILVER SPRING NETWORKS INC	83%	60%	-	40%
5.0	SIMPSON INVESTMENT COMPANY INC	SIMPSON INVESTMENT COMPANY INC	83%	0%	-	100%
5.0	SKECHERS U.S.A. INC	SKECHERS U.S.A. INC	83%	80%	-	20%
5.0	SKF AB	KAYDON CORP INC	83%	0%	-	100%
5.0	SMITH (A O) CORP	SMITH (A O) CORP	83%	20%	-	80%
5.0	SOUTHERN GRAPHIC SYSTEMS LLC	SOUTHERN GRAPHIC SYSTEMS LLC	83%	0%	-	80%
5.0	STANDARD REGISTER CO	STANDARD REGISTER CO	83%	0%	-	100%
5.0	STAPLES INC	STAPLES INC	83%	90%	-	10%
5.0	STARBUCKS CORP	STARBUCKS CORP	83%	90%	-	10%
5.0	STATER BROS. HOLDINGS INC	STATER BROS. HOLDINGS INC	83%	30%	-	70%
5.0	STRATEGIC MAPPING & DATA SERVICES LLC	FEEDDEALER.COM	83%	20%	1	50%
5.0	STRATEGIC MAPPING & DATA SERVICES LLC	STRATEGIC MAPPING & DATA SERVICES LLC	83%	20%	1	50%
5.0	SUPER MICRO COMPUTER INC	SUPER MICRO COMPUTER INC	83%	40%	-	60%
5.0	SUPERIOR UNIFORM	SUPERIOR UNIFORM	83%	50%	1	10%





	<b>GROUP INC</b>	GROUP INC				
5.0	<b>SWANSON HEALTH PRODUCTS</b>	SWANSON HEALTH PRODUCTS	83%	10%	-	70%
5.0	<b>TELEDYNE TECHNOLOGIES INC</b>	TELEDYNE TECHNOLOGIES INC	83%	50%	-	30%
5.0	<b>TELEPHONE AND DATA SYSTEMS INC</b>	TELEPHONE AND DATA SYSTEMS INC	83%	20%	-	80%
5.0	<b>TENET WINES</b>	TENET WINES	83%	0%	-	80%
5.0	<b>THE COCA-COLA CO</b>	THE COCA-COLA CO	83%	70%	-	10%
5.0	<b>THE CONTAINER STORE</b>	THE CONTAINER STORE	83%	30%	-	50%
5.0	<b>THE LAURIDSEN GROUP INC</b>	APC COMPANY INC	83%	30%	-	50%
5.0	<b>THE LAURIDSEN GROUP INC</b>	ESSENTIA A/S	83%	30%	-	50%
5.0	<b>THE LAURIDSEN GROUP INC</b>	THE BOYER VALLEY COMPANY INC	83%	30%	-	50%
5.0	<b>THOR INDUSTRIES INC</b>	THOR INDUSTRIES INC	83%	0%	-	100%
5.0	<b>THULE GROUP</b>	THULE GROUP	83%	90%	-	10%
5.0	<b>TOPPAN PHOTOMASKS INC</b>	TOPPAN PHOTOMASKS INC	83%	0%	-	100%
5.0	<b>TORO CO</b>	TORO CO	83%	0%	-	100%
5.0	<b>TOYS "R" US INC</b>	TOYS "R" US INC	83%	100%	-	0%
5.0	<b>TRADER JOE'S</b>	TRADER JOE'S	83%	80%	-	0%
5.0	<b>TREDEGAR CORP</b>	TREDEGAR FILM PRODUCTS	83%	20%	-	60%
5.0	<b>TREDEGAR CORP</b>	WILLIAM L. BONNELL COMPANY INC	83%	20%	-	60%
5.0	<b>U.S. CELLULAR</b>	U.S. CELLULAR	83%	0%	-	100%
5.0	<b>US AUTO PARTS NETWORK INC</b>	JC WHITNEY	83%	10%	1	50%
5.0	<b>VASCULAR SOLUTIONS INC</b>	VASCULAR SOLUTIONS INC	83%	0%	-	100%
5.0	<b>VISTA OUTDOOR INC</b>	VISTA OUTDOOR INC	83%	40%	1	20%
5.0	<b>WABASH NATIONAL CORP</b>	WABASH NATIONAL CORP	83%	50%	-	30%
5.0	<b>WAL-MART STORES INC</b>	WAL-MART STORES INC	83%	60%	-	40%
5.0	<b>WALNUT CREEK CHRYSLER JEEP DODGE RAM</b>	WALNUT CREEK CHRYSLER JEEP DODGE RAM	83%	0%	-	100%
5.0	<b>WILLIAMS-SONOMA INC</b>	WILLIAMS-SONOMA INC	83%	80%	-	0%
5.0	<b>WILSON SPORTING GOODS CO</b>	WILSON SPORTING GOODS CO	83%	100%	-	0%
5.0	<b>WILSON TOOL INTERNATIONAL</b>	WILSON TOOL INTERNATIONAL	83%	20%	-	60%
5.0	<b>WIRELESS ADVOCATES</b>	WIRELESS ADVOCATES	83%	0%	-	80%





	LLC	LLC				
5.0	ZEON CHEMICALS LP	ZEON CHEMICALS LP	83%	0%	-	80%
4.5	AGRIUM INC	AGRIUM INC	75%	90%	-	0%
4.5	ALBERTSONS	ALBERTSONS LLC	75%	70%	-	0%
4.5	ALBERTSONS	STAR MARKET	75%	70%	-	0%
4.5	ALLERGAN PLC	ALLERGAN PLC	75%	40%	-	50%
4.5	AMERICAN LICORICE COMPANY	AMERICAN LICORICE COMPANY	75%	70%	-	0%
4.5	AMPHASTAR PHARMACEUTICALS INC	AMPHASTAR PHARMACEUTICALS INC	75%	40%	-	50%
4.5	APPLE & EVE LLC	APPLE & EVE LLC	75%	60%	-	10%
4.5	AT&T INC	AT&T INC	75%	20%	-	70%
4.5	AUTOMATED PACKAGING SYSTEMS INC	AUTOMATED PACKAGING SYSTEMS INC	75%	0%	-	90%
4.5	AXALTA COATING SYSTEMS LTD	AXALTA COATING SYSTEMS LTD	75%	0%	4	40%
4.5	BERRY PLASTICS GROUP INC	BERRY PLASTICS GROUP INC	75%	70%	1	10%
4.5	BORDEN DAIRY	BORDEN DAIRY	75%	70%	-	0%
4.5	BP	AMPM	75%	40%	-	30%
4.5	BRG SPORTS	BRG SPORTS	75%	90%	-	0%
4.5	BRUNSWICK CORP	LUND BOATS	75%	20%	1	30%
4.5	BRUNSWICK CORP	MERCURY MARINE	75%	20%	1	30%
4.5	BURLINGTON COAT FACTORY INVS	BURLINGTON COAT FACTORY INVS	75%	70%	-	0%
4.5	CALAVO GROWERS INC	CALAVO GROWERS INC	75%	40%	-	50%
4.5	CALAVO GROWERS INC	RENAISSANCE FOOD GROUP	75%	40%	-	50%
4.5	CARTER'S INC	CARTER'S INC	75%	50%	1	0%
4.5	CHILDRENS PLACE INC	CHILDRENS PLACE INC	75%	60%	-	10%
4.5	CJ BY COOKIE JOHNSON	CJ BY COOKIE JOHNSON	75%	70%	1	0%
4.5	CONAGRA FOODS INC	DEL MONTE CORP	75%	80%	-	10%
4.5	COST PLUS WORLD MARKET	COST PLUS WORLD MARKET	75%	80%	-	10%
4.5	DELL INC	DELL INC	75%	80%	-	10%
4.5	DRYDOCK FOOTWEAR GROUP	DRYDOCK FOOTWEAR GROUP	75%	70%	-	0%
4.5	EXAR CORP	EXAR CORP	75%	70%	-	20%
4.5	FRUIT OF THE LOOM INC	FRUIT OF THE LOOM INC	75%	50%	-	20%
4.5	GELSON'S MARKETS	GELSON'S MARKETS	75%	60%	-	10%
4.5	GENERAL ELECTRIC	GENERAL ELECTRIC	75%	60%	-	10%



4.5	<b>GLOBAL AGRI-TRADE CORP</b>	GLOBAL AGRI-TRADE CORP	75%	80%	-	10%
4.5	<b>GRAFTECH INTERNATIONAL LTD</b>	GRAFTECH INTERNATIONAL LTD	75%	50%	1	20%
4.5	<b>HALYARD HEALTH INC</b>	HALYARD HEALTH INC	75%	90%	-	0%
4.5	<b>HAYNEEDLE INC</b>	HAYNEEDLE INC	75%	50%	-	20%
4.5	<b>INNOPHOS HOLDINGS INC</b>	INNOPHOS HOLDINGS INC	75%	0%	-	70%
4.5	<b>INTEL CORP</b>	INTEL CORP	75%	60%	-	10%
4.5	<b>INTERMATIC INC</b>	INTERMATIC INC	75%	80%	-	10%
4.5	<b>INVISTA</b>	INVISTA	75%	40%	-	30%
4.5	<b>ITT CORP</b>	ITT CORP	75%	0%	1	50%
4.5	<b>JAZZ PHARMACEUTICALS PLC</b>	JAZZ PHARMACEUTICALS PLC	75%	0%	5	10%
4.5	<b>JOHNSON OUTDOORS INC</b>	JOHNSON OUTDOORS INC	75%	70%	-	0%
4.5	<b>KEMIN INDUSTRIES INC</b>	KEMIN INDUSTRIES INC	75%	40%	1	10%
4.5	<b>KIMBERLY CLARK CORP</b>	KIMBERLY CLARK CORP	75%	80%	-	10%
4.5	<b>KIMRAY INC</b>	KIMRAY INC	75%	60%	-	10%
4.5	<b>KODIAK GROUP HOLDINGS CO</b>	KODIAK GROUP HOLDINGS CO	75%	70%	-	0%
4.5	<b>LIFECELL CORP</b>	LIFECELL CORP	75%	0%	4	0%
4.5	<b>LINCOLN ELECTRIC HLDGS INC</b>	LINCOLN ELECTRIC HLDGS INC	75%	20%	3	0%
4.5	<b>LINDT &amp; SPRÜNGLI AG</b>	GHIRARDELLI	75%	70%	-	0%
4.5	<b>LINDT &amp; SPRÜNGLI AG</b>	LINDT & SPRÜNGLI AG	75%	70%	-	0%
4.5	<b>LITTELFUSE INC</b>	LITTELFUSE INC	75%	70%	-	0%
4.5	<b>MATERION CORP</b>	MATERION CORP	75%	60%	-	10%
4.5	<b>MCDONALD'S CORP</b>	MCDONALD'S CORP	75%	80%	-	10%
4.5	<b>MCKEE FOODS</b>	MCKEE FOODS	75%	20%	-	50%
4.5	<b>MICHAEL KORS HOLDINGS LTD</b>	MICHAEL KORS HOLDINGS LTD	75%	70%	-	0%
4.5	<b>MICROCHIP TECHNOLOGY INC</b>	MICROCHIP TECHNOLOGY INC	75%	50%	-	40%
4.5	<b>MOHAWK INDUSTRIES INC</b>	MOHAWK INDUSTRIES INC	75%	60%	-	10%
4.5	<b>MULLINIX PACKAGES INC</b>	MULLINIX PACKAGES INC	75%	40%	1	30%
4.5	<b>MURPHY USA INC</b>	MURPHY USA INC	75%	70%	-	20%
4.5	<b>NAVISTAR INTERNATIONAL CORP</b>	NAVISTAR INTERNATIONAL CORP	75%	20%	3	20%
4.5	<b>NETSCOUT SYSTEMS INC</b>	NETSCOUT SYSTEMS INC	75%	20%	1	30%
4.5	<b>NEW BALANCE ATHLETICS INC</b>	JOE'S NEW BALANCE OUTLET	75%	70%	-	0%



4.5	NEW BALANCE ATHLETICS INC	NEW BALANCE ATHLETICS INC	75%	70%	-	0%
4.5	NEW BALANCE ATHLETICS INC	PF FLYERS	75%	70%	-	0%
4.5	PACIFIC SUNWEAR OF CALIFORNIA INC	PACIFIC SUNWEAR OF CALIFORNIA INC	75%	60%	-	10%
4.5	PANDA MANAGEMENT COMPANY INC	PANDA MANAGEMENT COMPANY INC	75%	20%	5	0%
4.5	PHARMAVITE LLC	PHARMAVITE LLC	75%	30%	2	10%
4.5	RENT-A-CENTER INC	RENT-A-CENTER INC	75%	10%	1	40%
4.5	REYNOLDS AMERICAN INC	R.J. REYNOLDS TOBACCO COMPANY	75%	90%	-	0%
4.5	RUE21 INC	RUE21 INC	75%	90%	-	0%
4.5	RUIZ FOODS	RUIZ FOODS	75%	50%	-	20%
4.5	SAFEWAY INC	SAFEWAY INC	75%	70%	-	0%
4.5	SELECT COMFORT CORP	SELECT COMFORT CORP	75%	70%	-	20%
4.5	SEMTECH CORP	SEMTECH CORP	75%	70%	-	0%
4.5	SHORETEL INC	SHORETEL INC	75%	20%	-	70%
4.5	SILGAN CONTAINERS LLC	SILGAN CONTAINERS LLC	75%	70%	-	0%
4.5	SLEEP TRAIN MATTRESS CENTERS	SLEEP TRAIN MATTRESS CENTERS	75%	20%	-	50%
4.5	SODASTREAM INTERNATIONAL LTD	SODASTREAM INTERNATIONAL LTD	75%	40%	3	0%
4.5	SPECTRE PERFORMANCE	SPECTRE PERFORMANCE	75%	20%	1	30%
4.5	STANDARD MOTOR PRODS	STANDARD MOTOR PRODS	75%	20%	-	50%
4.5	SUPERIOR ESSEX INC	SUPERIOR ESSEX INC	75%	50%	-	20%
4.5	TEXAS INSTRUMENTS INC	TEXAS INSTRUMENTS INC	75%	80%	-	10%
4.5	THE COLLINS COMPANIES	THE COLLINS COMPANIES	75%	0%	-	70%
4.5	THE PAMPERED CHEF LTD	THE PAMPERED CHEF LTD	75%	60%	-	10%
4.5	TIFFANY & CO	TIFFANY & CO	75%	70%	-	0%
4.5	TROJAN BATTERY	TROJAN BATTERY	75%	40%	1	10%
4.5	ULTA SALON COSMETCS & FRAG	ULTA SALON COSMETCS & FRAG	75%	40%	-	30%
4.5	UNIVERSAL ELECTRONICS INC	UNIVERSAL ELECTRONICS INC	75%	30%	-	60%
4.5	VAN DE VELDE NV	MARIE JO	75%	70%	-	0%
4.5	VAN DE VELDE NV	VAN DE VELDE NV	75%	70%	-	0%
4.5	VIKING RANGE LLC	VIKING RANGE LLC	75%	60%	-	30%
4.5	VISHAY INTERTECHNOLOGY	VISHAY INTERTECHNOLOGY INC	75%	80%	-	10%



	INC					
4.5	VTECH	VTECH ELECTRONICS NORTH AMERICA LLC	75%	20%	-	70%
4.5	VTECH	VTECH HOLDINGS LTD	75%	20%	-	70%
4.5	WALGREEN CO	DRUGSTORE.COM INC	75%	70%	-	0%
4.5	WALGREEN CO	WALGREEN CO	75%	70%	-	0%
4.0	3M CO	3M CO	67%	20%	1	20%
4.0	ABB LTD	BALDOR ELECTRIC CO	67%	40%	-	20%
4.0	ABC SUPPLY CO INC	ABC SUPPLY CO INC	67%	0%	-	60%
4.0	ABERCROMBIE & FITCH CO	ABERCROMBIE & FITCH CO	67%	60%	-	20%
4.0	ACADEMY LTD	ACADEMY LTD	67%	50%	-	10%
4.0	ADOBE SYSTEMS INC	ADOBE SYSTEMS INC	67%	70%	-	10%
4.0	ADRIANNA PAPELL	ADRIANNA PAPELL	67%	60%	-	0%
4.0	ADVANCED MICRO DEVICES INC	ADVANCED MICRO DEVICES INC	67%	70%	-	10%
4.0	AEP INDUSTRIES INC	AEP INDUSTRIES INC	67%	20%	-	60%
4.0	AGC GLASS COMPANY NORTH AMERICA INC	AGC GLASS COMPANY NORTH AMERICA INC	67%	0%	-	60%
4.0	AIDELLS SAUSAGE COMPANY INC	AIDELLS SAUSAGE COMPANY INC	67%	60%	-	20%
4.0	AIRTECH ADVANCED MATERIALS GROUP	AIRTECH ADVANCED MATERIALS GROUP	67%	20%	-	60%
4.0	AKEBONO BRAKE CORP	AKEBONO BRAKE CORP	67%	20%	-	40%
4.0	ALBEMARLE CORP	ALBEMARLE CORP	67%	30%	-	50%
4.0	ALERIS CORP	ALERIS CORP	67%	0%	-	60%
4.0	ALL ACCESS APPAREL INC	ALL ACCESS APPAREL INC	67%	20%	2	0%
4.0	ALPHATEC HOLDINGS INC	ALPHATEC HOLDINGS INC	67%	20%	1	20%
4.0	ANALOG DEVICES	ANALOG DEVICES	67%	80%	-	0%
4.0	ANHEUSER-BUSCH INBEV	ANHEUSER-BUSCH INBEV	67%	70%	-	10%
4.0	API TECHNOLOGIES CORP	API TECHNOLOGIES CORP	67%	0%	-	60%
4.0	APPLIED MICRO CIRCUITS CORP	APPLIED MICRO CIRCUITS CORP	67%	0%	-	80%
4.0	ARGEN CORP	ARGEN CORP	67%	20%	-	40%
4.0	ARRIS GROUP INC	ARRIS GROUP INC	67%	40%	-	40%
4.0	ASHLAND INC	ASHLAND INC	67%	40%	3	0%
4.0	AUTOZONE INC	AUTOZONE INC	67%	20%	1	20%
4.0	AVERY DENNISON CORP	AVERY DENNISON CORP	67%	20%	-	40%
4.0	BARD (C.R.) INC	BARD (C.R.) INC	67%	0%	4	20%
4.0	BAXALTA INC	BAXALTA INC	67%	50%	1	0%



4.0	BAXTER INTERNATIONAL INC	BAXTER INTERNATIONAL INC	67%	50%	-	30%
4.0	BEAULIEU GROUP LLC	BEAULIEU GROUP LLC	67%	40%	-	20%
4.0	BEST BUY CO INC	BEST BUY CO INC	67%	30%	-	30%
4.0	BLACK DIAMOND INC	BLACK DIAMOND INC	67%	80%	-	0%
4.0	BLUESTAR SILICONES USA CORP	BLUESTAR SILICONES USA CORP	67%	0%	-	80%
4.0	BRISTOL-MYERS SQUIBB CO	BRISTOL-MYERS SQUIBB CO	67%	30%	-	30%
4.0	BROCADE COMMUNICATIONS SYSTEMS INC	BROCADE COMMUNICATIONS SYSTEMS INC	67%	60%	1	10%
4.0	BUFFALO WILD WINGS INC	BUFFALO WILD WINGS INC	67%	0%	-	60%
4.0	BUMBLE BEE FOODS LLC	BUMBLE BEE FOODS LLC	67%	50%	-	30%
4.0	BUNGE LTD	BUNGE LTD	67%	20%	-	60%
4.0	CALUMET SPECIALTY PRODS -LP	CALUMET SPECIALTY PRODS -LP	67%	20%	1	50%
4.0	CATALENT INC	CATALENT INC	67%	20%	-	60%
4.0	CATO CORP	CATO CORP	67%	60%	-	0%
4.0	CATO CORP	VERSONA	67%	60%	-	0%
4.0	CAVIUM INC	CAVIUM INC	67%	40%	1	20%
4.0	CCPM	CCPM	67%	0%	-	60%
4.0	CENVEO INC	CENVEO INC	67%	40%	2	0%
4.0	CHRISTOPHER & BANKS CORP	CHRISTOPHER & BANKS CORP	67%	60%	-	20%
4.0	CINTAS CORP	CINTAS CORP	67%	70%	-	10%
4.0	COACH INC	COACH INC	67%	80%	-	0%
4.0	COTT CORP QUE	COTT CORP QUE	67%	30%	1	30%
4.0	CSS INDUSTRIES INC	CSS INDUSTRIES INC	67%	60%	-	0%
4.0	CST BRANDS INC	CST BRANDS INC	67%	20%	-	60%
4.0	CUMMINS-ALLISON CORP	CUMMINS-ALLISON CORP	67%	60%	-	20%
4.0	DAIRICONCEPTS LP	DAIRICONCEPTS LP	67%	0%	-	80%
4.0	DAYMEN CANADA ACQUISITION ULC	DAYMEN CANADA ACQUISITION ULC	67%	40%	-	20%
4.0	DEAN FOODS CO	DEAN FOODS CO	67%	50%	-	30%
4.0	DENTSPLY INTERNATL INC	DENTSPLY INTERNATL INC	67%	40%	-	40%
4.0	DIODES INC	DIODES INC	67%	20%	3	20%
4.0	DOLLAR TREE INC	DOLLAR TREE INC	67%	50%	-	10%
4.0	DOVER CORP	UNIFIED BRANDS	67%	0%	1	60%
4.0	DOW CHEMICAL CO	DOW AGROSCIENCES LLC	67%	0%	-	60%
4.0	DOW CHEMICAL CO	DOW CHEMICAL CO	67%	0%	-	60%



4.0	<b>DOW CORNING CORP</b>	DOW CORNING CORP	67%	30%	-	30%
4.0	<b>DOW CORNING CORP</b>	HEMLOCK SEMICONDUCTOR	67%	30%	-	30%
4.0	<b>EASTMAN CHEMICAL CO</b>	EASTMAN CHEMICAL CO	67%	30%	-	30%
4.0	<b>EATON CORP PLC</b>	EATON CORP PLC	67%	0%	-	60%
4.0	<b>EDGEWELL PERSONAL CARE CO</b>	EDGEWELL PERSONAL CARE CO	67%	30%	-	50%
4.0	<b>EDWARDS LIFESCIENCES CORP</b>	EDWARDS LIFESCIENCES CORP	67%	70%	-	10%
4.0	<b>ELITE SPICE</b>	ELITE SPICE	67%	40%	-	20%
4.0	<b>ENTEGRIS INC</b>	ENTEGRIS INC	67%	40%	-	40%
4.0	<b>ESTERLINE TECHNOLOGIES CORP</b>	ESTERLINE TECHNOLOGIES CORP	67%	0%	5	0%
4.0	<b>EXPRESS INC</b>	EXPRESS INC	67%	60%	-	0%
4.0	<b>FENDER MUSICAL INSTRUMENTS CORP</b>	FENDER MUSICAL INSTRUMENTS CORP	67%	50%	1	0%
4.0	<b>FENDER MUSICAL INSTRUMENTS CORP</b>	KMC MUSIC INC	67%	50%	1	0%
4.0	<b>FERRELLGAS PARTNERS -LP</b>	FERRELLGAS PARTNERS -LP	67%	20%	-	60%
4.0	<b>FETZER VINEYARDS</b>	BONTERRA	67%	20%	-	60%
4.0	<b>FIRST SOLAR INC</b>	FIRST SOLAR INC	67%	70%	-	10%
4.0	<b>FLOWSERVE CORP</b>	FLOWSERVE CORP	67%	60%	-	20%
4.0	<b>FORD MOTOR</b>	FORD MOTOR	67%	40%	-	20%
4.0	<b>FRESH AND EASY NEIGHBORHOOD MARKET INC</b>	FRESH AND EASY NEIGHBORHOOD MARKET INC	67%	60%	-	0%
4.0	<b>FRUITSMART INC</b>	FRUITSMART INC	67%	10%	3	20%
4.0	<b>FURNITURELAND SOUTH</b>	FURNITURELAND SOUTH	67%	30%	-	30%
4.0	<b>GAMESTOP CORP</b>	GAMESTOP CORP	67%	30%	-	30%
4.0	<b>GENERAL CABLE CORP/DE</b>	GENERAL CABLE CORP/DE	67%	60%	2	0%
4.0	<b>GENERAL DYNAMICS</b>	GENERAL DYNAMICS BATH IRON WORKS	67%	40%	1	0%
4.0	<b>GENERAL DYNAMICS</b>	GENERAL DYNAMICS ORDNANCE AND TACTICAL SYSTEMS	67%	50%	-	10%
4.0	<b>GENERAL DYNAMICS</b>	NASSCO	67%	50%	-	10%
4.0	<b>GENTEX CORP</b>	GENTEX CORP	67%	0%	1	40%
4.0	<b>GIANT EAGLE</b>	GIANT EAGLE	67%	30%	-	50%
4.0	<b>GKN PLC</b>	GKN PLC	67%	30%	-	30%
4.0	<b>GRACO INC</b>	GRACO INC	67%	40%	-	20%
4.0	<b>GRUMA CORP</b>	GUERRERO	67%	10%	1	30%
4.0	<b>GRUMA CORP</b>	MASECA	67%	10%	1	30%





4.0	HANCOCK FABRICS INC	HANCOCK FABRICS INC	67%	50%	-	10%
4.0	HARLEY-DAVIDSON INC	HARLEY-DAVIDSON INC	67%	50%	1	10%
4.0	HARRIS RANCH BEEF COMPANY	HARRIS RANCH BEEF COMPANY	67%	20%	2	10%
4.0	HENKEL CORP	HENKEL CORP	67%	60%	-	20%
4.0	HGST INC	HGST INC	67%	70%	-	10%
4.0	HOLLYFRONTIER CORP	HOLLYFRONTIER REFINING & MARKETING LLC	67%	0%	-	60%
4.0	HUDSON'S BAY COMPANY	HUDSON'S BAY COMPANY	67%	50%	-	30%
4.0	HUHTAMAKI INC	HUHTAMAKI INC	67%	0%	1	40%
4.0	IMPAX LABORATORIES INC	IMPAX LABORATORIES INC	67%	10%	1	50%
4.0	IMPCO TECHNOLOGIES INC	IMPCO TECHNOLOGIES INC	67%	30%	1	10%
4.0	INDEPENDENCE SALES & MARKETING LLC	INDEPENDENCE SALES & MARKETING LLC	67%	60%	-	20%
4.0	INFOBLOX INC	INFOBLOX INC	67%	20%	1	40%
4.0	INTERNATIONAL PAPER	INTERNATIONAL PAPER	67%	30%	1	20%
4.0	IPG PHOTONICS CORP	IPG PHOTONICS CORP	67%	0%	-	80%
4.0	JERRY LEIGH	JERRY LEIGH	67%	60%	-	0%
4.0	JO-ANN STORES	JO-ANN STORES	67%	30%	-	30%
4.0	JOHN MORRELL FOOD GROUP	JOHN MORRELL FOOD GROUP	67%	20%	-	40%
4.0	JOSEPH T. RYERSON & SON INC	JOSEPH T. RYERSON & SON INC	67%	50%	-	10%
4.0	JX HOLDINGS INC	JX NIPPON MINING & MINING USA INC	67%	0%	1	40%
4.0	KAPSTONE PAPER & PACKAGING	KAPSTONE PAPER & PACKAGING	67%	20%	-	40%
4.0	KATE SPADE & CO	KATE SPADE & CO	67%	60%	-	0%
4.0	KEN'S FOODS INC	KEN'S FOODS INC	67%	40%	-	20%
4.0	KEURIG GREEN MOUNTAIN INC	KEURIG GREEN MOUNTAIN INC	67%	30%	-	30%
4.0	KEYES MOTORS INC	KEYES LEXUS	67%	40%	-	40%
4.0	KEYES MOTORS INC	KEYES TOYOTA	67%	40%	-	40%
4.0	KINGSTON TECHNOLOGY CORP	KINGSTON TECHNOLOGY CORP	67%	60%	-	20%
4.0	KIRKLAND'S INC	KIRKLAND'S INC	67%	0%	-	60%
4.0	KNOLL INC	KNOLL INC	67%	60%	-	20%
4.0	KRAFT HEINZ CO	KRAFT FOODS GROUP INC	67%	50%	-	10%
4.0	LA BREA BAKERY	LA BREA BAKERY	67%	60%	-	0%
4.0	LAND O'FROST INC	LAND O'FROST INC	67%	20%	-	40%





4.0	LANXESS AG	LANXESS AG	67%	30%	-	30%
4.0	LEAPFROG ENTERPRISES INC	LEAPFROG ENTERPRISES INC	67%	80%	-	0%
4.0	LEGRAND SA	LEGRAND SA	67%	0%	-	80%
4.0	LIBERTY INTERACTV CP QVC GRP	QVC INC	67%	50%	-	10%
4.0	LINDSAY CORP	LINDSAY CORP	67%	60%	-	0%
4.0	LITEHOUSE INC	LITEHOUSE INC	67%	20%	-	60%
4.0	LIVANOVA PLC	LIVANOVA PLC	67%	0%	-	80%
4.0	MATTEL INC	MATTEL INC	67%	60%	-	20%
4.0	MERCK KGAA	EMD MILLIPORE CORP	67%	10%	-	70%
4.0	MERITOR INC	MERITOR INC	67%	40%	-	20%
4.0	MIAS FASHION MANUFACTURING COMPANY INC	MIAS FASHION MANUFACTURING COMPANY INC	67%	20%	-	40%
4.0	MICHAELS COS INC	MICHAELS COS INC	67%	50%	1	10%
4.0	MICRON TECHNOLOGY INC	MICRON TECHNOLOGY INC	67%	60%	-	20%
4.0	MILLERCOORS LLC	MILLERCOORS LLC	67%	10%	-	70%
4.0	MOUNT VERNON MILLS INC	MOUNT VERNON MILLS INC	67%	50%	-	10%
4.0	MTU ONSITE ENERGY SYSTEMS GMBH	MTU ONSITE ENERGY SYSTEMS GMBH	67%	0%	2	20%
4.0	MULE-HIDE PRODUCTS CO INC	MULE-HIDE PRODUCTS CO INC	67%	0%	-	60%
4.0	NBTY INC	NBTY INC	67%	50%	-	30%
4.0	NEOPHOTONICS CORP	NEOPHOTONICS CORP	67%	0%	5	0%
4.0	NEWMANS OWN INC	NEWMANS OWN INC	67%	20%	-	40%
4.0	NIAGARA BOTTLING LLC	NIAGARA BOTTLING LLC	67%	40%	1	20%
4.0	NORTHWEST PIPE CO	NORTHWEST PIPE CO	67%	40%	1	30%
4.0	OMNIVISION TECHNOLOGIES INC	OMNIVISION TECHNOLOGIES INC	67%	20%	-	60%
4.0	ONLY ON ITS BRAND GRASS VALLEY'S WEB	BELDEN INC	67%	50%	-	30%
4.0	ONLY ON ITS BRANDS' WEB	CALERES INC	67%	70%	-	10%
4.0	OWENS CORNING	OWENS CORNING	67%	50%	1	20%
4.0	PACCAR INC	PACCAR INC	67%	60%	-	20%
4.0	PARADIGM PRECISION	PARADIGM PRECISION	67%	0%	-	60%
4.0	PEP BOYS-MANNY MOE & JACK	PEP BOYS-MANNY MOE & JACK	67%	20%	-	40%
4.0	PERDUE FARMS	PERDUE FARMS	67%	40%	-	20%
4.0	PERICOM SEMICONDUCTOR CORP	PERICOM SEMICONDUCTOR CORP	67%	70%	-	10%



4.0	PETALUMA POULTRY	PETALUMA POULTRY	67%	40%	-	20%
4.0	PETCO ANIMAL SUPPLIES STORES INC	PETCO ANIMAL SUPPLIES STORES INC	67%	60%	-	0%
4.0	PLEXUS CORP	PLEXUS CORP	67%	0%	-	80%
4.0	POLYCOM INC	POLYCOM INC	67%	50%	-	30%
4.0	PPG INDUSTRIES INC	PPG INDUSTRIES INC	67%	40%	-	20%
4.0	PRECOR INC	PRECOR INC	67%	60%	-	0%
4.0	PRECOR INC	PREVA	67%	60%	-	0%
4.0	QORVO INC	TRIQUINT SEMICONDUCTOR	67%	50%	-	30%
4.0	QSC AUDIO PRODUCTS LLC	QSC AUDIO PRODUCTS LLC	67%	10%	2	20%
4.0	RANK GROUP LTD	LUBER-FINER	67%	20%	-	40%
4.0	REGENERON PHARMACEUTICALS	REGENERON PHARMACEUTICALS	67%	40%	-	40%
4.0	RENFRO CORP	RENFRO CORP	67%	50%	-	10%
4.0	RHEEM MANUFACTURING COMPANY	RHEEM MANUFACTURING COMPANY	67%	20%	1	40%
4.0	RITE AID CORP	RITE AID CORP	67%	60%	-	0%
4.0	ROGERS CORP	ROGERS CORP	67%	40%	-	20%
4.0	RPM INTERNATIONAL INC	CARBOLINE	67%	50%	-	30%
4.0	RPM INTERNATIONAL INC	FIBERGRATE COMPOSITE STRUCTURES INC	67%	0%	2	50%
4.0	RUSH ENTERPRISES INC	RUSH ENTERPRISES INC	67%	10%	2	40%
4.0	SAINT-GOBAIN	SAINT-GOBAIN	67%	80%	-	0%
4.0	SANMAR CORP	SANMAR CORP	67%	60%	-	0%
4.0	SCHULMAN (A.) INC	SCHULMAN (A.) INC	67%	80%	-	0%
4.0	SCOSCHE INDUSTRIES	SCOSCHE INDUSTRIES	67%	70%	-	10%
4.0	SHIRE PLC	SHIRE PLC	67%	40%	-	40%
4.0	SIGMA DESIGNS INC	SIGMA DESIGNS INC	67%	50%	-	10%
4.0	SKYWORKS SOLUTIONS INC	SKYWORKS SOLUTIONS INC	67%	50%	1	20%
4.0	SMART & FINAL INC	SMART & FINAL INC	67%	0%	-	60%
4.0	SOLE TECHNOLOGY INC	SOLE TECHNOLOGY INC	67%	50%	-	10%
4.0	SPENCER GIFTS LLC	SPENCER GIFTS LLC	67%	40%	2	0%
4.0	SPENCER GIFTS LLC	SPIRIT HALLOWEEN LLC	67%	40%	2	0%
4.0	STANLEY BLACK & DECKER INC	STANLEY BLACK & DECKER INC	67%	30%	-	30%
4.0	STEELSCAPE INC	STEELSCAPE INC	67%	0%	-	60%
4.0	SUBURBAN PROPANE PARTNERS LP	SUBURBAN PROPANE PARTNERS LP	67%	60%	-	20%
4.0	SULZER AG	SULZER AG	67%	0%	-	80%



4.0	SUN CHEMICAL CORP	SUN CHEMICAL CORP	67%	40%	-	20%
4.0	SUNPOWER CORP	SUNPOWER CORP	67%	20%	1	30%
4.0	SWEET BABY RAY'S	SWEET BABY RAY'S	67%	40%	-	20%
4.0	SYNAPTICS INC	SYNAPTICS INC	67%	40%	-	40%
4.0	TARGET	TARGET	67%	60%	-	0%
4.0	TASER INTERNATIONAL INC	TASER INTERNATIONAL INC	67%	0%	-	80%
4.0	TEREX CORP	TEREX CORP	67%	20%	-	40%
4.0	THE GYMBOREE CORP	THE GYMBOREE CORP	67%	70%	-	10%
4.0	THE LAURIDSEN GROUP INC	BHJ A/S	67%	30%	-	50%
4.0	THE SHERIDAN GROUP INC	THE SHERIDAN GROUP INC	67%	0%	-	60%
4.0	THE WALT DISNEY COMPANY	THE WALT DISNEY COMPANY	67%	70%	-	10%
4.0	THE WONDERFUL COMPANY LLC	HALOS	67%	0%	1	40%
4.0	THE WONDERFUL COMPANY LLC	POMWONDERFUL LLC	67%	0%	1	40%
4.0	THE WONDERFUL COMPANY LLC	THE WONDERFUL COMPANY LLC	67%	0%	1	40%
4.0	TIMKEN CO	TIMKEN CO	67%	30%	-	50%
4.0	TJX COMPANIES INC	HOMEGOODS	67%	60%	-	0%
4.0	TJX COMPANIES INC	MARSHALLS	67%	60%	-	0%
4.0	TJX COMPANIES INC	TJX COMPANIES INC	67%	60%	-	0%
4.0	TOKYO OHKA KOGYO	TOKYO OHKA KOGYO	67%	40%	-	40%
4.0	TRANS GLOBE LIGHTING	TRANS GLOBE LIGHTING	67%	20%	-	40%
4.0	TURANO BAKING COMPANY	TURANO BAKING COMPANY	67%	0%	-	60%
4.0	ULTRATECH INC	ULTRATECH INC	67%	30%	1	30%
4.0	UNDER ARMOUR INC	UNDER ARMOUR INC	67%	80%	-	0%
4.0	UNITED TECHNOLOGIES CORP	PRATT & WHITNEY ROCKETDYNE INC	67%	20%	-	60%
4.0	UNITED TECHNOLOGIES CORP	UNITED TECHNOLOGIES CORP	67%	20%	-	60%
4.0	USANA HEALTH SCIENCES INC	USANA HEALTH SCIENCES INC	67%	40%	2	0%
4.0	USG CORP	USG CORP	67%	20%	-	40%
4.0	VF CORP	NAUTICA	67%	60%	-	10%
4.0	VF CORP	VF CORP	67%	60%	-	10%
4.0	VISCOFAN SA	VISCOFAN SA	67%	20%	-	60%
4.0	VMWARE INC	VMWARE INC	67%	60%	1	10%
4.0	W. R. MEADOWS INC	W. R. MEADOWS INC	67%	10%	1	50%
4.0	WEATHER SHIELD MFG INC	WEATHER SHIELD MFG INC	67%	0%	-	80%



4.0	WEST MARINE INC	WEST MARINE INC	67%	50%	-	10%
4.0	XCERRA CORP	XCERRA CORP	67%	60%	-	20%
4.0	YOKOHAMA RUBBER	YOKOHAMA RUBBER	67%	20%	1	20%
4.0	ZUMIEZ INC	ZUMIEZ INC	67%	50%	-	30%
3.5	AIR PRODUCTS & CHEMICALS INC	AIR PRODUCTS & CHEMICALS INC	58%	20%	-	50%
3.5	AVX CORP	AVX CORP	58%	20%	-	30%
3.5	BALL CORP	BALL CORP	58%	30%	1	20%
3.5	BAYER USA	BAYER USA	58%	30%	-	20%
3.5	BIOMARIN PHARMACEUTICAL INC	BIOMARIN PHARMACEUTICAL INC	58%	50%	-	20%
3.5	BIO-RAD LABORATORIES INC	BIO-RAD LABORATORIES INC	58%	60%	-	10%
3.5	BP	BP AMERICA INC	58%	40%	-	30%
3.5	BRIDGFORD FOODS CORP	BRIDGFORD FOODS CORP	58%	50%	1	10%
3.5	CABELAS INC	CABELAS INC	58%	50%	-	20%
3.5	CARTER'S INC	OSHKOSH B'GOSH	58%	50%	1	0%
3.5	CHIPOTLE MEXICAN GRILL INC	CHIPOTLE MEXICAN GRILL INC	58%	50%	-	0%
3.5	CISCO SYSTEMS INC	CISCO SYSTEMS INC	58%	70%	-	0%
3.5	CLARKWESTERN DIETRICH BUILDING SYSTEMS LLC	CLARKWESTERN DIETRICH BUILDING SYSTEMS LLC	58%	30%	-	20%
3.5	COHERENT INC	COHERENT INC	58%	40%	-	10%
3.5	CONAGRA FOODS INC	CONAGRA FOODS INC	58%	40%	-	30%
3.5	COVERIS FLEXIBLES US LLC	COVERIS FLEXIBLES US LLC	58%	10%	-	40%
3.5	CUBIC CORP	CUBIC CORP	58%	60%	-	10%
3.5	CUMMINS INC	CUMMINS INC	58%	60%	-	10%
3.5	DANA HOLDING CORP	DANA HOLDING CORP	58%	60%	-	10%
3.5	DANNER	DANNER	58%	60%	-	10%
3.5	DASHAMERICA INC	DASHAMERICA INC	58%	40%	-	10%
3.5	DEERE & COMPANY	DEERE & COMPANY	58%	30%	1	20%
3.5	DIAGEO PLC (ADR)	DIAGEO PLC (ADR)	58%	40%	-	30%
3.5	DOMINANCE APPAREL INC	DOMINANCE APPAREL INC	58%	50%	-	0%
3.5	ECO-BAT TECHNOLOGIES LTD	ECO-BAT TECHNOLOGIES LTD	58%	50%	-	0%
3.5	EMD PERFORMANCE MATERIALS CORP	EMD PERFORMANCE MATERIALS CORP	58%	10%	-	60%
3.5	ESTEE LAUDER COMPANIES INC	ESTEE LAUDER COMPANIES INC	58%	50%	-	0%
3.5	EVONIK INDUSTRIES	EVONIK	58%	50%	-	0%
3.5	FREUDENBERG	FREUDENBERG NONWOVENS	58%	30%	-	20%



3.5	FREUDENBERG	FREUDENBERG PERFORMANCE MATERIALS	58%	30%	-	20%
3.5	FREUDENBERG	FREUDENBERG SEALING TECHNOLOGIES	58%	30%	-	20%
3.5	GALLS LLC	GALLS LLC	58%	50%	-	0%
3.5	HARMAN INTERNATIONAL INDS	HARMAN INTERNATIONAL INDS	58%	40%	-	30%
3.5	HARRIS CORP	HARRIS CORP	58%	70%	-	0%
3.5	HENRY COMPANY LLC	HENRY COMPANY LLC	58%	70%	-	0%
3.5	HEXION INC	HEXION INC	58%	20%	-	50%
3.5	HUNTSMAN CORP	HUNTSMAN CORP	58%	0%	-	70%
3.5	JAPAN PULP & PAPER (USA) CORP	JAPAN PULP & PAPER (USA) CORP	58%	40%	1	0%
3.5	JUNIPER NETWORKS INC	JUNIPER NETWORKS INC	58%	40%	1	10%
3.5	LAND O'LAKES INC	LAND O'LAKES INC	58%	30%	1	10%
3.5	LIBBEY INC	LIBBEY INC	58%	50%	-	0%
3.5	LUMINEX CORP	LUMINEX CORP	58%	60%	-	10%
3.5	MILLER (HERMAN) INC	MILLER (HERMAN) INC	58%	70%	-	0%
3.5	NIKE	NIKE INC	58%	70%	-	0%
3.5	NORPAC FOODS INC	NORPAC FOODS INC	58%	50%	1	0%
3.5	OCZ TECHNOLOGY GROUP INC	OCZ TECHNOLOGY GROUP INC	58%	60%	-	10%
3.5	OFFICE DEPOT INC	OFFICE DEPOT INC	58%	50%	-	0%
3.5	OXFORD INDUSTRIES INC	TOMMY BAHAMA	58%	50%	-	0%
3.5	PACE PLC	PACE PLC	58%	40%	-	10%
3.5	PELICAN PRODUCTS INC	PELICAN PRODUCTS INC	58%	40%	2	0%
3.5	PLASTIPAK HOLDINGS INC	PLASTIPAK HOLDINGS INC	58%	40%	1	10%
3.5	POST HOLDINGS INC	POST FOODS LLC	58%	40%	-	10%
3.5	POST HOLDINGS INC	POST HOLDINGS INC	58%	40%	-	10%
3.5	POTTERS INDUSTRIES LLC	POTTERS INDUSTRIES LLC	58%	50%	1	0%
3.5	RANDA ACCESSORIES	RANDA ACCESSORIES	58%	50%	-	0%
3.5	READY PAC FOODS INC	READY PAC FOODS INC	58%	0%	1	60%
3.5	ROQUETTE AMERICA INC	ROQUETTE AMERICA INC	58%	20%	-	30%
3.5	S. C. JOHNSON & SON INC	S. C. JOHNSON & SON INC	58%	60%	-	10%
3.5	SCICLONE PHARMACEUTICALS INC	SCICLONE PHARMACEUTICALS INC	58%	40%	-	30%
3.5	SENSIENT	SENSIENT	58%	20%	3	0%



	<b>TECHNOLOGIES CORP</b>	TECHNOLOGIES CORP				
3.5	<b>SENTIMENTS</b>	SENTIMENTS	58%	0%	3	0%
3.5	<b>SKULLCANDY INC</b>	SKULLCANDY INC	58%	70%	-	0%
3.5	<b>SNYDERS-LANCE INC</b>	SNYDERS-LANCE INC	58%	30%	1	0%
3.5	<b>SONOCO PRODUCTS CO</b>	SONOCO PRODUCTS CO	58%	40%	-	10%
3.5	<b>SPANX INC</b>	SPANX INC	58%	10%	1	20%
3.5	<b>SPECIALIZED BICYCLE COMPONENTS INC</b>	SPECIALIZED BICYCLE COMPONENTS INC	58%	50%	-	0%
3.5	<b>SPX CORP</b>	SPX CORP	58%	0%	1	50%
3.5	<b>STATOIL ASA</b>	STATOIL ASA	58%	60%	-	10%
3.5	<b>SUPERIOR INDUSTRIES INTERNATIONAL INC</b>	SUPERIOR INDUSTRIES INTERNATIONAL INC	58%	70%	-	0%
3.5	<b>SWEET PEOPLE APPAREL INC</b>	SWEET PEOPLE APPAREL INC	58%	70%	-	0%
3.5	<b>TESORO CORP</b>	TESORO CORP	58%	30%	-	20%
3.5	<b>THE HONEST CO</b>	HONEST BEAUTY	58%	50%	-	0%
3.5	<b>THE HONEST CO</b>	THE HONEST CO	58%	50%	-	0%
3.5	<b>THERMO FISHER SCIENTIFIC INC</b>	THERMO FISHER SCIENTIFIC INC	58%	60%	-	10%
3.5	<b>TRACTOR SUPPLY CO</b>	TRACTOR SUPPLY CO	58%	30%	-	20%
3.5	<b>VENTURA COASTAL</b>	VENTURA COASTAL	58%	40%	-	10%
3.5	<b>VENTURA FOODS LLC</b>	DEAN'S	58%	50%	-	0%
3.5	<b>VENTURA FOODS LLC</b>	VENTURA FOODS LLC	58%	50%	-	0%
3.5	<b>VIASAT INC</b>	VIASAT INC	58%	60%	-	10%
3.5	<b>WILLIAMSON-DICKIE MFG. CO</b>	WILLIAMSON-DICKIE MFG. CO	58%	50%	-	0%
3.5	<b>XEROX CORP</b>	XEROX CORP	58%	60%	-	10%
3.5	<b>YOUNG LIVING ESSENTIAL OILS</b>	YOUNG LIVING ESSENTIAL OILS	58%	50%	-	0%
3.5	<b>ZEP INC</b>	ZEP INC	58%	30%	-	20%
3.0	<b>ABB LTD</b>	ABB LTD	50%	40%	-	20%
3.0	<b>ACER INC</b>	ACER INC	50%	60%	-	0%
3.0	<b>ALERE INC</b>	ALERE INC	50%	0%	-	40%
3.0	<b>ALLIANCE LAUNDRY SYSTEMS LLC</b>	ALLIANCE LAUNDRY SYSTEMS LLC	50%	0%	-	60%
3.0	<b>AMAZON.COM INC</b>	AMAZON.COM INC	50%	40%	-	20%
3.0	<b>AMETEK INC</b>	AMETEK INC	50%	60%	-	0%
3.0	<b>AMGEN PHARMACEUTICALS INC</b>	AMGEN PHARMACEUTICALS INC	50%	30%	-	30%
3.0	<b>AQUA-LUNG AMERICA INC</b>	AQUA-LUNG AMERICA INC	50%	40%	-	0%
3.0	<b>ASC PROFILES LLC</b>	ASC PROFILES LLC	50%	0%	-	60%
3.0	<b>AVAYA INC</b>	AVAYA INC	50%	20%	-	40%





3.0	<b>B&amp;G FOODS INC</b>	B&G FOODS INC	50%	20%	-	20%
3.0	<b>BARILLA AMERICA</b>	BARILLA AMERICA	50%	30%	-	10%
3.0	<b>BCBG MAX AZRIA GROUP INC</b>	BCBG MAX AZRIA GROUP INC	50%	40%	-	0%
3.0	<b>BENCHMARK ELECTRONICS INC</b>	BENCHMARK ELECTRONICS INC	50%	20%	-	20%
3.0	<b>BERKSHIRE HATHAWAY</b>	SHAW INDUSTRIES GROUP INC	50%	30%	1	20%
3.0	<b>BIG HEART PET BRANDS</b>	BIG HEART PET BRANDS	50%	20%	-	40%
3.0	<b>BOIRON</b>	BOIRON	50%	10%	1	10%
3.0	<b>CHART INDUSTRIES INC</b>	CHART INDUSTRIES INC	50%	0%	-	60%
3.0	<b>CHICO'S FAS INC</b>	CHICO'S FAS INC	50%	40%	-	0%
3.0	<b>CHICO'S FAS INC</b>	WHITE HOUSE BLACK MARKET	50%	40%	-	0%
3.0	<b>CHURCH &amp; DWIGHT INC</b>	CHURCH & DWIGHT INC	50%	40%	-	20%
3.0	<b>COLGATE-PALMOLIVE COMPANY</b>	COLGATE-PALMOLIVE COMPANY	50%	60%	-	0%
3.0	<b>COMMSCOPE HOLDING CO INC</b>	COMMSCOPE HOLDING CO INC	50%	40%	-	20%
3.0	<b>COSTCO WHOLESALE CORP</b>	COSTCO WHOLESALE CORP	50%	30%	-	10%
3.0	<b>DANAHER CORP</b>	DANAHER CORP	50%	0%	-	60%
3.0	<b>DECKERS OUTDOOR CORP</b>	DECKERS OUTDOOR CORP	50%	60%	-	0%
3.0	<b>DORMAN PRODUCTS INC</b>	DORMAN PRODUCTS INC	50%	40%	-	20%
3.0	<b>DR PEPPER SNAPPLE GROUP INC</b>	DR PEPPER SNAPPLE GROUP INC	50%	50%	-	10%
3.0	<b>DS SERVICES OF AMERICA INC</b>	DS SERVICES OF AMERICA INC	50%	20%	-	20%
3.0	<b>E. I. DU PONT DE NEMOURS AND COMPANY</b>	E. I. DU PONT DE NEMOURS AND COMPANY	50%	60%	-	0%
3.0	<b>ELI LILLY</b>	ELI LILLY	50%	30%	2	0%
3.0	<b>ELKAY PLASTICS</b>	ELKAY PLASTICS	50%	30%	-	30%
3.0	<b>ESILICON CORP</b>	ESILICON CORP	50%	10%	-	30%
3.0	<b>ETHAN ALLEN INTERIORS INC</b>	ETHAN ALLEN INTERIORS INC	50%	20%	2	20%
3.0	<b>EVOQUA WATER TECHNOLOGIES LLC</b>	EVOQUA WATER TECHNOLOGIES LLC	50%	20%	1	0%
3.0	<b>FERRO CORP</b>	FERRO CORP	50%	20%	3	0%
3.0	<b>FIAT CHRYSLER AUTOMOBILES NV</b>	FIAT CHRYSLER AUTOMOBILES NV	50%	30%	-	30%
3.0	<b>FINISH LINE INC</b>	FINISH LINE INC	50%	20%	-	40%
3.0	<b>FLOOR &amp; DECOR</b>	FLOOR & DECOR HLDGS	50%	30%	1	0%





	<b>HLDGS -REDH</b>	<b>-REDH</b>				
<b>3.0</b>	<b>FRY'S ELECTRONICS INC</b>	FRY'S ELECTRONICS INC	50%	0%	-	40%
<b>3.0</b>	<b>GATAN INC</b>	GATAN INC	50%	40%	-	0%
<b>3.0</b>	<b>GATES CORP</b>	GATES CORP	50%	20%	-	20%
<b>3.0</b>	<b>GILEAD SCIENCES INC</b>	GILEAD SCIENCES INC	50%	40%	-	20%
<b>3.0</b>	<b>GIVAUDAN S.A</b>	GIVAUDAN S.A	50%	30%	-	10%
<b>3.0</b>	<b>GLIDEWELL LABORATORIES</b>	GLIDEWELL LABORATORIES	50%	40%	1	10%
<b>3.0</b>	<b>GN NETCOM</b>	GN NETCOM	50%	40%	-	20%
<b>3.0</b>	<b>GREENBRIER COMPANIES INC</b>	GREENBRIER COMPANIES INC	50%	20%	-	40%
<b>3.0</b>	<b>GRUMA CORP</b>	MISSION FOODSERVICE	50%	10%	1	30%
<b>3.0</b>	<b>GUITTARD CHOCOLATE CO</b>	GUITTARD CHOCOLATE CO	50%	40%	-	0%
<b>3.0</b>	<b>HAMPSHIRE GROUP LTD</b>	HAMPSHIRE GROUP LTD	50%	60%	-	0%
<b>3.0</b>	<b>HARRIS CORP</b>	EXELIS INC	50%	60%	-	0%
<b>3.0</b>	<b>HARRY WINSTON INC</b>	HARRY WINSTON INC	50%	40%	-	0%
<b>3.0</b>	<b>HENNES &amp; MAURITZ AB</b>	H&M	50%	40%	-	20%
<b>3.0</b>	<b>HILLENBRAND INC</b>	BATESVILLE SERVICES INC	50%	20%	1	0%
<b>3.0</b>	<b>HILLENBRAND INC</b>	HILLENBRAND INC	50%	20%	1	0%
<b>3.0</b>	<b>HNI CORP</b>	HNI CORP	50%	50%	-	10%
<b>3.0</b>	<b>HORIZON GLOBAL CORP</b>	HORIZON GLOBAL CORP	50%	0%	4	0%
<b>3.0</b>	<b>HU-FRIEDY MFG. CO LLC</b>	HU-FRIEDY MFG. CO LLC	50%	10%	2	0%
<b>3.0</b>	<b>HYDRITE CHEMICAL CO</b>	HYDRITE CHEMICAL CO	50%	10%	-	50%
<b>3.0</b>	<b>HYSTER-YALE MATERIALS HNDLNG</b>	HYSTER-YALE MATERIALS HNDLNG	50%	20%	-	20%
<b>3.0</b>	<b>ICU MEDICAL INC</b>	ICU MEDICAL INC	50%	50%	-	10%
<b>3.0</b>	<b>ILLUMINA INC</b>	ILLUMINA INC	50%	50%	-	10%
<b>3.0</b>	<b>INGERSOLL-RAND PLC</b>	INGERSOLL-RAND PLC	50%	40%	-	20%
<b>3.0</b>	<b>IN-N-OUT BURGERS</b>	IN-N-OUT BURGERS	50%	40%	-	0%
<b>3.0</b>	<b>INTERSIL CORP</b>	INTERSIL CORP	50%	20%	1	20%
<b>3.0</b>	<b>ITRON INC</b>	ITRON INC	50%	0%	-	60%
<b>3.0</b>	<b>ITW</b>	GAYLORD INDUSTRIES	50%	0%	-	40%
<b>3.0</b>	<b>ITW</b>	ILLINOIS TOOL WORKS INC	50%	0%	-	40%
<b>3.0</b>	<b>ITW</b>	ITW GLOBAL FOOD EQUIPMENT SOLUTIONS	50%	0%	-	40%
<b>3.0</b>	<b>ITW</b>	WITTCO FOODSERVICE EQUIPMENT	50%	0%	-	40%
<b>3.0</b>	<b>J.D. HEISKELL</b>	J.D. HEISKELL	50%	0%	-	40%



	<b>HOLDINGS LLC</b>	HOLDINGS LLC				
<b>3.0</b>	<b>J.M. SMUCKER</b>	J.M. SMUCKER	50%	30%	-	10%
<b>3.0</b>	<b>JOHN ELWAY'S CROWN SCION</b>	JOHN ELWAY'S CROWN SCION	50%	20%	-	40%
<b>3.0</b>	<b>KEY TECHNOLOGY INC</b>	KEY TECHNOLOGY INC	50%	0%	-	60%
<b>3.0</b>	<b>KEYSIGHT TECHNOLOGIES INC</b>	KEYSIGHT TECHNOLOGIES INC	50%	60%	-	0%
<b>3.0</b>	<b>KROGER CO</b>	KROGER CO	50%	60%	-	0%
<b>3.0</b>	<b>KVH INDUSTRIES INC</b>	KVH INDUSTRIES INC	50%	20%	1	20%
<b>3.0</b>	<b>L-3 COMMUNICATIONS HLDGS INC</b>	L-3 COMMUNICATIONS HLDGS INC	50%	30%	-	30%
<b>3.0</b>	<b>LAKE REGION MEDICAL</b>	LAKE REGION MEDICAL	50%	20%	-	20%
<b>3.0</b>	<b>LEXINGTON HOME BRANDS</b>	LEXINGTON HOME BRANDS	50%	30%	-	10%
<b>3.0</b>	<b>LINEAR TECHNOLOGY CORP</b>	LINEAR TECHNOLOGY CORP	50%	60%	-	0%
<b>3.0</b>	<b>LOGITECH INTERNATIONAL SA</b>	LOGITECH INTERNATIONAL SA	50%	60%	-	0%
<b>3.0</b>	<b>LOWES</b>	LOWE'S COMPANIES INC	50%	30%	-	10%
<b>3.0</b>	<b>LUCAS OIL PRODUCTS INC</b>	LUCAS OIL PRODUCTS INC	50%	0%	2	10%
<b>3.0</b>	<b>LUTRON ELECTRONICS CO INC</b>	LUTRON ELECTRONICS CO INC	50%	30%	-	10%
<b>3.0</b>	<b>MARCOPOLO IMPORTS</b>	MARCOPOLO IMPORTS	50%	40%	-	0%
<b>3.0</b>	<b>MARIANI PACKING CO INC</b>	MARIANI PACKING CO INC	50%	20%	-	20%
<b>3.0</b>	<b>MATTSON TECHNOLOGY INC</b>	MATTSON TECHNOLOGY INC	50%	10%	1	30%
<b>3.0</b>	<b>M-D BUILDING PRODUCTS INC</b>	M-D BUILDING PRODUCTS INC	50%	60%	-	0%
<b>3.0</b>	<b>MEDLINE INDUSTRIES</b>	MEDLINE INDUSTRIES	50%	60%	-	0%
<b>3.0</b>	<b>MENTHOLATUM COMPANY</b>	MENTHOLATUM COMPANY	50%	0%	1	20%
<b>3.0</b>	<b>MI PUEBLO FOOD CENTER</b>	MI PUEBLO FOOD CENTER	50%	40%	-	0%
<b>3.0</b>	<b>MKS INSTRUMENTS INC</b>	MKS INSTRUMENTS INC	50%	40%	-	20%
<b>3.0</b>	<b>MONDELEZ INTERNATIONAL INC</b>	MONDELEZ INTERNATIONAL INC	50%	50%	-	10%
<b>3.0</b>	<b>MULTI-FINELINE ELECTRONIX INC</b>	MULTI-FINELINE ELECTRONIX INC	50%	10%	-	50%
<b>3.0</b>	<b>MUNDI WESTPORT GROUP</b>	MUNDI WESTPORT GROUP	50%	60%	-	0%
<b>3.0</b>	<b>MUSCO FAMILY OLIVE COMPANY</b>	MUSCO FAMILY OLIVE COMPANY	50%	10%	1	10%
<b>3.0</b>	<b>NATIONAL VISION INC</b>	NATIONAL VISION INC	50%	0%	-	60%



3.0	NETAPP INC	NETAPP INC	50%	50%	-	10%
3.0	NEW ERA	NEW ERA	50%	60%	-	0%
3.0	NEWEGG INC	NEWEGG INC	50%	20%	-	20%
3.0	NORCAL KENWORTH	NORCAL KENWORTH	50%	0%	1	20%
3.0	NORTEK INC	NORTEK INC	50%	20%	1	0%
3.0	OMNIMOUNT	OMNIMOUNT	50%	40%	-	20%
3.0	ON SEMICONDUCTOR CORP	ON SEMICONDUCTOR CORP	50%	40%	-	20%
3.0	O'REILLY AUTOMOTIVE INC	O'REILLY AUTOMOTIVE INC	50%	40%	-	20%
3.0	PAPA JOHNS INTERNATIONAL INC	PAPA JOHNS INTERNATIONAL INC	50%	30%	-	30%
3.0	PENNY NEWMAN GRAIN CO	PENNY NEWMAN GRAIN CO	50%	0%	-	40%
3.0	PLANTRONICS INC	PLANTRONICS INC	50%	50%	-	10%
3.0	PRINTPACK INC	PRINTPACK INC	50%	10%	1	10%
3.0	PROCTER & GAMBLE	PROCTER & GAMBLE	50%	60%	-	0%
3.0	QLOGIC CORP	QLOGIC CORP	50%	50%	-	10%
3.0	QUANTUM CORP	QUANTUM CORP	50%	30%	-	30%
3.0	QUEST CONSTRUCTION PRODUCTS	QUEST CONSTRUCTION PRODUCTS	50%	0%	-	40%
3.0	RADIO SYSTEMS CORP	INVISIBLE FENCE INC	50%	40%	1	0%
3.0	RANK GROUP LTD	CHAMPION LABORATORIES INC	50%	20%	-	40%
3.0	RANK GROUP LTD	UCI-FRAM AUTOBRANDS	50%	20%	-	40%
3.0	RAWLINGS SPORTING GOODS	RAWLINGS SPORTING GOODS	50%	40%	-	0%
3.0	RED HAWK FIRE & SECURITY	RED HAWK FIRE & SECURITY	50%	0%	-	60%
3.0	REEDS JEWELERS INC	REEDS JEWELERS INC	50%	40%	-	20%
3.0	ROLLS-ROYCE POWER SYSTEMS AG	ROLLS-ROYCE POWER SYSTEMS AG	50%	0%	2	20%
3.0	SAINT LAURENT	SAINT LAURENT	50%	40%	-	20%
3.0	SCHAEFFLER AG	SCHAEFFLER AG	50%	40%	-	20%
3.0	SEE'S CANDY INC	SEE'S CANDY INC	50%	40%	-	0%
3.0	SIEMENS AG	SIEMENS AG	50%	60%	-	0%
3.0	SIERRA PACIFIC INDUSTRIES	SIERRA PACIFIC INDUSTRIES	50%	30%	-	30%
3.0	SILICON LABORATORIES INC	SILICON LABORATORIES INC	50%	0%	-	60%
3.0	SKC COMMUNICATION PRODUCTS LLC	SKC COMMUNICATION PRODUCTS LLC	50%	0%	-	40%
3.0	SMC LTD	SMC LTD	50%	50%	-	10%
3.0	SMITHFIELD FOODS INC	SMITHFIELD FOODS INC	50%	0%	-	60%



3.0	<b>SPORTS AUTHORITY</b>	SPORTS AUTHORITY	50%	30%	-	10%
3.0	<b>SUNEDISON INC</b>	SUNEDISON INC	50%	50%	-	10%
3.0	<b>SUPERIOR INDUSTRIES INC</b>	SUPERIOR INDUSTRIES INC	50%	0%	-	40%
3.0	<b>TAGUS</b>	TAGUS	50%	40%	-	20%
3.0	<b>TECHNICOLOR</b>	TECHNICOLOR	50%	20%	-	20%
3.0	<b>TESLA MOTORS INC</b>	TESLA MOTORS INC	50%	60%	-	0%
3.0	<b>THE HADDAD APPAREL GROUP LTD</b>	THE HADDAD APPAREL GROUP LTD	50%	60%	-	0%
3.0	<b>THE VOMELA COMPANIES</b>	THE VOMELA COMPANIES	50%	0%	-	60%
3.0	<b>TOWER SEMICONDUCTOR LTD</b>	TOWER SEMICONDUCTOR LTD	50%	40%	1	0%
3.0	<b>TREEHOUSE FOODS INC</b>	BAY VALLEY FOODS LLC	50%	40%	-	0%
3.0	<b>TREEHOUSE FOODS INC</b>	NATURALLY FRESH	50%	40%	-	0%
3.0	<b>TREEHOUSE FOODS INC</b>	S.T. SPECIALTY FOODS INC	50%	40%	-	0%
3.0	<b>TRIMAS CORP</b>	TRIMAS CORP	50%	0%	4	0%
3.0	<b>TRINITY INDUSTRIES</b>	TRINITY INDUSTRIES	50%	0%	-	60%
3.0	<b>TYSON FOODS INC</b>	CIRCLE FOODS LLC	50%	40%	-	0%
3.0	<b>UNIFI INC</b>	UNIFI INC	50%	50%	-	10%
3.0	<b>VF CORP</b>	THE NORTH FACE	50%	60%	-	10%
3.0	<b>VICOR CORP</b>	VICOR CORP	50%	0%	3	20%
3.0	<b>VOLKSWAGEN AG</b>	VOLKSWAGEN AG	50%	30%	-	10%
3.0	<b>WABTEC CORP</b>	WABTEC CORP	50%	20%	-	40%
3.0	<b>WESTERN DIGITAL CORP</b>	WESTERN DIGITAL CORP	50%	50%	-	10%
3.0	<b>WINCO FOODS</b>	WINCO FOODS	50%	20%	-	20%
3.0	<b>XILINX INC</b>	XILINX INC	50%	40%	-	20%
3.0	<b>ZEBRA TECHNOLOGIES CP</b>	ZEBRA TECHNOLOGIES CP	50%	20%	1	20%
2.5	<b>ADVOCARE INTERNATIONAL LP</b>	ADVOCARE INTERNATIONAL LP	42%	30%	-	20%
2.5	<b>AGCO CORP</b>	AGCO CORP	42%	50%	-	0%
2.5	<b>AGILITY FUEL SYSTEMS</b>	AGILITY FUEL SYSTEMS	42%	20%	-	10%
2.5	<b>APPLIED MATERIALS INC</b>	APPLIED MATERIALS INC	42%	40%	-	10%
2.5	<b>ASSOCIATED BRITISH FOODS PLC</b>	AB MAURI FOOD INC	42%	30%	-	0%
2.5	<b>AVIAT NETWORKS INC</b>	AVIAT NETWORKS INC	42%	20%	-	30%
2.5	<b>BECTON DICKINSON AND COMPANY</b>	CAREFUSION CORP	42%	20%	-	30%
2.5	<b>BRIGGS &amp; STRATTON</b>	BRIGGS & STRATTON	42%	50%	-	0%
2.5	<b>CAMPBELL SOUP COMPANY</b>	CAMPBELL SOUP COMPANY	42%	40%	1	0%



2.5	CELESTICA INC	CELESTICA INC	42%	50%	-	0%
2.5	COOK INC	COOK INC	42%	10%	3	0%
2.5	DOMETIC CORP	ATWOOD MOBILE PRODUCTS LLC	42%	20%	-	10%
2.5	DOMETIC CORP	DOMETIC CORP	42%	20%	-	10%
2.5	DOREL INDUSTRIES INC	DHP DOREL HOME PRODUCTS	42%	30%	-	0%
2.5	DOREL INDUSTRIES INC	DOREL INDUSTRIES INC	42%	30%	-	0%
2.5	ENERGIZER HOLDINGS INC	ENERGIZER HOLDINGS INC	42%	30%	-	20%
2.5	ENTERPRISE PRODUCTS PARTNERS LP	ENTERPRISE PRODUCTS PARTNERS LP	42%	20%	-	30%
2.5	FEI CO	FEI CO	42%	30%	-	20%
2.5	FIRMENICH SA	FIRMENICH SA	42%	20%	-	10%
2.5	FLEXTRONICS INTERNATIONAL LTD	FLEXTRONICS INTERNATIONAL LTD	42%	10%	-	20%
2.5	GOODYEAR TIRE & RUBBER CO	GOODYEAR-DUNLOP TIRES NORTH AMERICA LTD	42%	30%	-	0%
2.5	HALLMARK CARDS INC	HALLMARK CARDS INC	42%	50%	-	0%
2.5	HARRY AND DAVID LLC	HARRY AND DAVID LLC	42%	0%	3	0%
2.5	HILL-ROM HOLDINGS INC	HILL-ROM HOLDINGS INC	42%	40%	-	10%
2.5	HONEYWELL INTERNATIONAL INC	HONEYWELL INTERNATIONAL INC	42%	30%	-	20%
2.5	HORMEL FOODS CORP	MUSCLE MILK	42%	0%	-	30%
2.5	HUBBELL INC	HUBBELL INC	42%	0%	1	30%
2.5	IBM	IBM	42%	40%	-	10%
2.5	KAO CORP	KAO CORP	42%	20%	-	10%
2.5	KELLOGG COMPANY	KELLOGG COMPANY	42%	40%	1	0%
2.5	KEYES MOTORS INC	KEYES WOODLAND HILLS HONDA	42%	0%	-	30%
2.5	LANDS' END INC	LANDS' END INC	42%	30%	-	0%
2.5	LEATHERMAN TOOL GROUP INC	LEATHERMAN TOOL GROUP INC	42%	10%	-	20%
2.5	MARC FISHER FOOTWEAR	MARC FISHER FOOTWEAR	42%	40%	-	10%
2.5	METHODE ELECTRONICS INC	METHODE ELECTRONICS INC	42%	50%	-	0%
2.5	MITSUBISHI	MITSUBISHI MOTORS	42%	0%	2	0%
2.5	MOR FURNITURE FOR LESS INC	MOR FURNITURE FOR LESS INC	42%	0%	2	0%
2.5	NEIMAN MARCUS GROUP INC	NEIMAN MARCUS GROUP INC	42%	20%	3	10%
2.5	NOVARTIS AG	NOVARTIS AG	42%	50%	-	0%
2.5	O. C. TANNER CO	O. C. TANNER CO	42%	40%	-	10%



2.5	<b>OCCIDENTAL PETROLEUM CORP</b>	OCCIDENTAL PETROLEUM CORP	42%	10%	-	20%
2.5	<b>OIL DRI CORP AMERICA</b>	OIL DRI CORP AMERICA	42%	20%	-	30%
2.5	<b>ORBITAL ATK INC</b>	ORBITAL ATK INC	42%	40%	-	10%
2.5	<b>PRIME TIME INTERNATIONAL</b>	PRIME TIME INTERNATIONAL	42%	10%	1	20%
2.5	<b>RESTORATION HARDWARE HOLDINGS INC</b>	RESTORATION HARDWARE HOLDINGS INC	42%	50%	-	0%
2.5	<b>ROCHE HOLDING AG</b>	GENENTECH INC	42%	30%	-	20%
2.5	<b>SCA-SVENSKA CELLULOSA AB</b>	SCA-SVENSKA CELLULOSA AB	42%	30%	-	0%
2.5	<b>SEARS HOLDINGS CORP</b>	SEARS HOLDINGS CORP	42%	30%	-	0%
2.5	<b>TENNANT CO</b>	TENNANT CO	42%	0%	-	50%
2.5	<b>THE YANKEE CANDLE COMPANY INC</b>	THE YANKEE CANDLE COMPANY INC	42%	30%	-	0%
2.5	<b>TOOTSIE ROLL INDUSTRIES INC</b>	TOOTSIE ROLL INDUSTRIES INC	42%	40%	-	10%
2.5	<b>TREASURY WINE ESTATES</b>	ETUDE WINES	42%	40%	-	10%
2.5	<b>TREASURY WINE ESTATES</b>	GREG NORMAN ESTATES	42%	40%	-	10%
2.5	<b>TREASURY WINE ESTATES</b>	TREASURY WINE ESTATES	42%	40%	-	10%
2.5	<b>TREK BICYCLE CORP</b>	TREK BICYCLE CORP	42%	20%	-	10%
2.5	<b>VITERRA INC</b>	VITERRA INC	42%	0%	-	50%
2.5	<b>WINPAK LTD</b>	WINPAK LTD	42%	30%	-	20%
2.0	<b>ACER INC</b>	ACER GROUP	33%	40%	-	0%
2.0	<b>ALPINE ELECTRONICS OF AMERICA INC</b>	ALPINE ELECTRONICS OF AMERICA INC	33%	20%	-	0%
2.0	<b>BARNES &amp; NOBLE INC</b>	BARNES & NOBLE INC	33%	20%	-	20%
2.0	<b>BECTON DICKINSON AND COMPANY</b>	BECTON DICKINSON AND COMPANY	33%	30%	1	0%
2.0	<b>C&amp;H SUGAR COMPANY INC</b>	C&H SUGAR COMPANY INC	33%	20%	-	0%
2.0	<b>CALIFORNIA DAIRIES INC</b>	CALIFORNIA DAIRIES INC	33%	20%	-	0%
2.0	<b>CELANESE CORP</b>	CELANESE CORP	33%	20%	-	0%
2.0	<b>CHARLOTTE PIPE AND FOUNDRY COMPANY</b>	CHARLOTTE PIPE AND FOUNDRY COMPANY	33%	0%	-	40%
2.0	<b>COTTON ON GROUP</b>	COTTON ON GROUP	33%	20%	-	0%
2.0	<b>CPI INTERNATIONAL INC</b>	CPI INTERNATIONAL INC	33%	0%	-	40%
2.0	<b>CURTISS-WRIGHT CORP</b>	CURTISS-WRIGHT CORP	33%	20%	-	20%
2.0	<b>CYPRESS SEMICONDUCTOR CORP</b>	CYPRESS SEMICONDUCTOR CORP	33%	20%	-	20%





2.0	DAIMLER AG	DAIMLER AG	33%	20%	1	10%
2.0	DRIVETIME AUTOMOTIVE GROUP INC	DRIVETIME AUTOMOTIVE GROUP INC	33%	20%	-	0%
2.0	E. & J. GALLO WINERY	E. & J. GALLO WINERY	33%	10%	-	10%
2.0	EATON CORP PLC	COOPER INDUSTRIES PLC	33%	30%	-	10%
2.0	ECOLAB INC	ECOLAB INC	33%	30%	-	10%
2.0	ECOLAB INC	NALCO CHAMPION	33%	30%	-	10%
2.0	ETRO SPA	ETRO SPA	33%	30%	-	10%
2.0	EVERGREEN PACKAGING INC	EVERGREEN PACKAGING INC	33%	0%	-	40%
2.0	FINGERHUT	FINGERHUT	33%	20%	-	0%
2.0	FIVE GUYS ENTERPRISES LLC	FIVE GUYS ENTERPRISES LLC	33%	0%	1	20%
2.0	FMC CORP	FMC CORP	33%	30%	-	10%
2.0	FOOT LOCKER INC	FOOT LOCKER INC	33%	20%	-	0%
2.0	FOSSIL GROUP INC	FOSSIL GROUP INC	33%	30%	-	10%
2.0	GENERAL DYNAMICS	GENERAL DYNAMICS MISSION SYSTEMS	33%	40%	-	0%
2.0	G-III APPAREL GROUP LTD	G-III APPAREL GROUP LTD	33%	40%	-	0%
2.0	GRAPHIC PACKAGING HOLDING CO	GRAPHIC PACKAGING HOLDING CO	33%	20%	-	20%
2.0	GROUP 1 AUTOMOTIVE INC	GROUP 1 AUTOMOTIVE INC	33%	0%	-	20%
2.0	H. C. STARCK INC	H. C. STARCK INC	33%	40%	-	0%
2.0	HARRIS FREEMAN	HARRIS FREEMAN	33%	0%	1	0%
2.0	HD SUPPLY HOLDINGS INC	HD SUPPLY HOLDINGS INC	33%	30%	-	10%
2.0	HOYA	HOYA VISION NORTH AMERICA	33%	20%	-	0%
2.0	HYDRONIX WATER TECHNOLOGY LLC	HYDRONIX WATER TECHNOLOGY LLC	33%	20%	-	0%
2.0	IROBOT CORP	IROBOT CORP	33%	0%	-	20%
2.0	ITW	STERO	33%	0%	-	40%
2.0	JAKKS PACIFIC INC	JAKKS PACIFIC INC	33%	30%	-	10%
2.0	JARDEN CORP	JARDEN CONSUMER SOLUTIONS	33%	20%	-	0%
2.0	JARDEN CORP	JARDEN CORP	33%	20%	-	0%
2.0	JARDEN CORP	VÖLKL	33%	20%	-	0%
2.0	KEYES MOTORS INC	KEYES AUDI	33%	20%	-	0%
2.0	KMG CHEMICALS INC	KMG CHEMICALS INC	33%	40%	-	0%
2.0	KNOWLES CORP	KNOWLES CORP	33%	40%	-	0%
2.0	LAM RESEARCH CORP	LAM RESEARCH CORP	33%	40%	-	0%
2.0	LANDEC CORP	APIO INC	33%	20%	-	0%





2.0	LANDEC CORP	EAT SMART	33%	20%	-	0%
2.0	LEPRINO FOODS	LEPRINO FOODS	33%	30%	-	10%
2.0	LIQUIDITY SERVICES INC	LIQUIDITY SERVICES INC	33%	30%	-	10%
2.0	L'OREAL	L'OREAL	33%	40%	-	0%
2.0	LTD COMMODITIES	LTD COMMODITIES	33%	20%	-	0%
2.0	LUXOTTICA GROUP SPA	CONTACTSDIRECT	33%	0%	1	0%
2.0	MACY'S INC	MACY'S INC	33%	20%	-	0%
2.0	MALLINCKRODT PLC	MALLINCKRODT PLC	33%	20%	-	20%
2.0	MARIAN INC	MARIAN INC	33%	0%	1	0%
2.0	MATHIS BROTHERS FURNITURE	MATHIS BROTHERS FURNITURE	33%	20%	-	0%
2.0	MCCORMICK & COMPANY INC	MCCORMICK & COMPANY INC	33%	0%	3	0%
2.0	MEIJER INC	MEIJER INC	33%	20%	-	0%
2.0	MENARD INC	MENARD INC	33%	40%	-	0%
2.0	MERIT MEDICAL SYSTEMS INC	MERIT MEDICAL SYSTEMS INC	33%	20%	-	20%
2.0	MICREL INC	MICREL INC	33%	20%	-	0%
2.0	MOTOR CITY	MOTOR CITY	33%	30%	-	10%
2.0	MOTOR CITY	MOTOR CITY BUICK GMC	33%	30%	-	10%
2.0	NATIONAL INSTRUMENTS CORP	NATIONAL INSTRUMENTS CORP	33%	20%	-	20%
2.0	NUCOR CORP	NUCOR CORP	33%	40%	-	0%
2.0	OLIN CORP	OLIN CORP	33%	20%	-	20%
2.0	ONE KINGS LANE INC	ONE KINGS LANE INC	33%	40%	-	0%
2.0	ORACLE CORP	ORACLE CORP	33%	20%	1	0%
2.0	O'SULLIVAN FILMS INC	O'SULLIVAN FILMS INC	33%	0%	-	20%
2.0	PCH INTERNATIONAL	PCH INTERNATIONAL	33%	10%	-	30%
2.0	PEREGRINE SEMICONDUCTOR CORP	PEREGRINE SEMICONDUCTOR CORP	33%	0%	-	20%
2.0	PERRIGO CO PLC	PERRIGO CO PLC	33%	30%	-	10%
2.0	PHIBRO ANIMAL HEALTH CORP	PHIBRO ANIMAL HEALTH CORP	33%	0%	-	40%
2.0	PHIBRO ANIMAL HEALTH CORP	PHIBRO-TECH INC	33%	0%	-	40%
2.0	PHILLIPS 66	PHILLIPS 66	33%	20%	-	0%
2.0	POLARTEC LLC	POLARTEC LLC	33%	0%	-	20%
2.0	POLYPORE INTERNATIONAL INC	POLYPORE INTERNATIONAL INC	33%	0%	-	40%
2.0	PUMA	COBRA PUMA GOLF	33%	20%	-	0%
2.0	QUIKSILVER	QUIKSILVER	33%	20%	-	0%



2.0	RC WILLEY HOME FURNISHINGS	RC WILLEY HOME FURNISHINGS	33%	0%	2	0%
2.0	RDO EQUIPMENT CO	RDO EQUIPMENT CO	33%	20%	-	0%
2.0	REAL MEX RESTAURANTS	SINIGUAL	33%	20%	-	0%
2.0	REPSOL SA	REPSOL SA	33%	30%	-	10%
2.0	RG BARRY CORP	RG BARRY CORP	33%	40%	-	0%
2.0	ROSS STORES INC	ROSS STORES INC	33%	20%	-	0%
2.0	ROYALTY CARPET MILLS	CAMELOT	33%	0%	-	20%
2.0	ROYALTY CARPET MILLS	PACIFICREST	33%	0%	-	20%
2.0	ROYALTY CARPET MILLS	ROYALTY CARPET MILLS	33%	0%	-	20%
2.0	SCHOLLE CORP	SCHOLLE CORP	33%	20%	-	20%
2.0	SCHURMAN FINE PAPERS	SCHURMAN FINE PAPERS	33%	40%	-	0%
2.0	SEAGATE TECHNOLOGY PLC	XYRATEX LTD	33%	20%	-	20%
2.0	SENECA FOODS CORP	SENECA FOODS CORP	33%	20%	-	20%
2.0	SIGNET JEWELERS LTD	ZALE JEWELERS	33%	20%	-	0%
2.0	SPORT CHALET INC	SPORT CHALET INC	33%	40%	-	0%
2.0	STEPAN CO	STEPAN CO	33%	20%	-	0%
2.0	STERLING JEWELERS INC	STERLING JEWELERS INC	33%	20%	1	0%
2.0	SUKUP MANUFACTURING CO	SUKUP MANUFACTURING CO	33%	20%	-	0%
2.0	TERADYNE INC	TERADYNE INC	33%	0%	-	40%
2.0	THE FRESH CONNECTION	THE FRESH CONNECTION	33%	20%	-	0%
2.0	THE MORNING STAR PACKING CO	THE MORNING STAR PACKING CO	33%	0%	-	20%
2.0	TRANS WORLD ENTMT CORP	F.Y.E.	33%	20%	-	0%
2.0	TREEHOUSE FOODS INC	E.D.SMITH FOODS LTD	33%	40%	-	0%
2.0	TUPPERWARE BRANDS CORP	TUPPERWARE BRANDS CORP	33%	40%	-	0%
2.0	TVILUM	TVILUM	33%	20%	-	0%
2.0	VALERO ENERGY CORP	VALERO ENERGY CORP	33%	40%	-	0%
2.0	VELCRO INDUSTRIES B.V.	VELCRO INDUSTRIES B.V.	33%	30%	-	10%
2.0	WASA NORTH AMERICA LLC	WASA NORTH AMERICA LLC	33%	0%	-	20%
2.0	WESTLAKE	WESTLAKE CHEMICAL CORP	33%	20%	-	0%
2.0	ZIMMER BIOMET HOLDINGS INC	BIOMET INC	33%	20%	-	20%



2.0	ZIMMER BIOMET HOLDINGS INC	ZIMMER BIOMET HOLDINGS INC	33%	20%	-	20%
1.5	A-DEC INC	A-DEC INC	25%	0%	-	10%
1.5	AFFINIA GROUP INTRMDT HLDGS	AFFINIA GROUP INTRMDT HLDGS	25%	30%	-	0%
1.5	AGILENT TECHNOLOGIES INC	AGILENT TECHNOLOGIES INC	25%	10%	-	20%
1.5	ARCHER-DANIELS-MIDLAND CO	ARCHER-DANIELS-MIDLAND CO	25%	0%	-	30%
1.5	ASML HOLDING NV	ASML HOLDING NV	25%	30%	-	0%
1.5	ATKORE INTERNATIONAL HLDGS	ATKORE INTERNATIONAL HLDGS	25%	10%	1	0%
1.5	BOSTON BEER INC	BOSTON BEER INC	25%	20%	-	10%
1.5	BRISTOL COMPRESSORS INTERNATIONAL INC	BRISTOL COMPRESSORS INTERNATIONAL INC	25%	10%	-	0%
1.5	CARMAX INC	CARMAX INC	25%	0%	1	0%
1.5	CHALLENGE DAIRY PRODUCTS	CHALLENGE DAIRY PRODUCTS	25%	20%	-	10%
1.5	DIALIGHT PLC	DIALIGHT PLC	25%	20%	-	10%
1.5	EASTMAN KODAK CO	EASTMAN KODAK CO	25%	0%	2	0%
1.5	FORMFACTOR INC	FORMFACTOR INC	25%	0%	1	20%
1.5	GOODYEAR TIRE & RUBBER CO	DUNLOP MOTORCYCLE TIRES	25%	30%	-	0%
1.5	GOODYEAR TIRE & RUBBER CO	GOODYEAR TIRE & RUBBER CO	25%	30%	-	0%
1.5	GROCERY OUTLET INC	GROCERY OUTLET INC	25%	30%	-	0%
1.5	HONDA MOTOR CO LTD	HONDA MOTOR CO LTD	25%	0%	-	30%
1.5	HORMEL FOODS CORP	HORMEL FOODS CORP	25%	0%	-	30%
1.5	J.M. HUBER CORP	HUBER ENGINEERED MATERIALS	25%	0%	2	0%
1.5	KIRIN HOLDINGS CO LTD	KIRIN HOLDINGS CO LTD	25%	30%	-	0%
1.5	LATTICE SEMICONDUCTOR	SILICON IMAGE INC	25%	0%	1	20%
1.5	LENNOX INTERNATIONAL INC	LENNOX INTERNATIONAL INC	25%	20%	-	10%
1.5	LENOX CORP	LENOX CORP	25%	10%	-	0%
1.5	NASHVILLE WIRE PRODUCTS	NASHVILLE WIRE PRODUCTS	25%	10%	-	0%
1.5	NCH CORP	NCH CORP	25%	0%	-	30%
1.5	NEWMARKET CORP	NEWMARKET CORP	25%	20%	-	10%
1.5	ROCKWELL AUTOMATION	ROCKWELL AUTOMATION	25%	20%	-	10%
1.5	S&C ELECTRIC	S&C ELECTRIC	25%	10%	-	20%



	COMPANY	COMPANY				
1.5	SALVATORE FERRAGAMO S.P.A.	SALVATORE FERRAGAMO S.P.A.	25%	10%	-	0%
1.5	SEARS HOLDINGS CORP	SHOP YOUR WAY	25%	30%	-	0%
1.5	SIGNET JEWELERS LTD	SIGNET JEWELERS LTD	25%	10%	1	0%
1.5	SPICERS PAPER INC	SPICERS PAPER INC	25%	10%	-	0%
1.5	SPORTSWEAR INC	SPORTSWEAR INC	25%	20%	-	10%
1.5	SUNOPTA INC	SUNOPTA INC	25%	10%	-	0%
1.5	TOMTOM NV	TOMTOM NV	25%	30%	-	0%
1.5	URBAN OUTFITTERS INC	URBAN OUTFITTERS INC	25%	30%	-	0%
1.0	AEROJET ROCKETDYNE HOLDINGS	AEROJET ROCKETDYNE HOLDINGS	17%	0%	-	0%
1.0	AK STEEL HOLDING CORP	AK STEEL HOLDING CORP	17%	20%	-	0%
1.0	APPVION INC	APPVION INC	17%	20%	-	0%
1.0	ASSOCIATED BRITISH FOODS PLC	PGP INTERNATIONAL INC	17%	20%	-	0%
1.0	BAE SYSTEMS PLC	BAE SYSTEMS PLC	17%	20%	-	0%
1.0	BAKERS FOOTWEAR GROUP INC	BAKERS FOOTWEAR GROUP INC	17%	0%	-	0%
1.0	BARNES GROUP INC	BARNES GROUP INC	17%	20%	-	0%
1.0	BASF SE	BASF SE	17%	20%	-	0%
1.0	BED BATH & BEYOND INC	BED BATH & BEYOND INC	17%	10%	-	10%
1.0	BEL BRANDS USA INC	BEL BRANDS USA INC	17%	0%	-	0%
1.0	BELL LABORATORIES INC	BELL LABORATORIES INC	17%	0%	-	0%
1.0	BEMIS COMPANY INC	BEMIS COMPANY INC	17%	0%	-	0%
1.0	BIG LOTS INC	BIG LOTS INC	17%	0%	-	0%
1.0	BLACKBERRY LTD	BLACKBERRY LTD	17%	20%	-	0%
1.0	BOSCOV'S DEPARTMENT STORE LLC	BOSCOV'S DEPARTMENT STORE LLC	17%	0%	-	0%
1.0	CAL-COMP ELECTRONICS (USA) COLTD	CAL-COMP ELECTRONICS (USA) COLTD	17%	0%	-	0%
1.0	CHRISTOPHER RANCH	CHRISTOPHER RANCH	17%	0%	-	0%
1.0	COHU INC	COHU INC	17%	0%	-	20%
1.0	COLUMBIA SPORTSWEAR CO	MONTRAIL	17%	0%	-	0%
1.0	COLUMBIA SPORTSWEAR CO	MOUNTAIN HARDWEAR	17%	0%	-	0%
1.0	COMMERCIAL METALS	COMMERCIAL METALS	17%	0%	-	0%
1.0	COORSTEK INC	COORSTEK INC	17%	0%	-	0%
1.0	COVESTRO LLC	COVESTRO LLC	17%	0%	-	0%



1.0	DANAHER CORP	KAVO DENTAL CORP	17%	20%	-	0%
1.0	DRISCOLL STRAWBERRY ASSOCIATE	DRISCOLL STRAWBERRY ASSOCIATE	17%	0%	-	0%
1.0	DUNKIN' BRANDS GROUP INC	BASKIN-ROBBINS	17%	0%	-	0%
1.0	DUNKIN' BRANDS GROUP INC	DUNKIN' DONUTS	17%	0%	-	0%
1.0	ECBC INC	ECBC INC	17%	20%	-	0%
1.0	ELECTROLUX AB	ELECTROLUX AB	17%	20%	-	0%
1.0	EMERSON ELECTRIC	EMERSON ELECTRIC	17%	20%	-	0%
1.0	ENI SPA	ENI SPA	17%	20%	-	0%
1.0	EVANS ADHESIVE CORP LTD	EVANS ADHESIVE CORP LTD	17%	0%	-	0%
1.0	FORTINET INC	FORTINET INC	17%	0%	-	20%
1.0	FULLER (H. B.) CO	FULLER (H. B.) CO	17%	0%	-	0%
1.0	FUSIONZONE AUTOMOTIVE INC	CLAREMONT MAZDA	17%	0%	-	0%
1.0	FUSIONZONE AUTOMOTIVE INC	CLAREMONT VOLKSWAGEN	17%	0%	-	0%
1.0	FXI	FXI	17%	0%	-	0%
1.0	GLATFELTER	GLATFELTER	17%	0%	-	0%
1.0	GLOBAL BRASS & COPPER HLDGS	A.J. OSTER	17%	0%	-	0%
1.0	GLOBAL BRASS & COPPER HLDGS	CHASE BRASS	17%	0%	-	0%
1.0	GLOBALFOUNDRIES U.S. INC	GLOBALFOUNDRIES U.S. INC	17%	10%	-	10%
1.0	HARDINGE INC	HARDINGE INC	17%	0%	-	20%
1.0	HICKMAN'S FAMILY FARMS INC	HICKMAN'S FAMILY FARMS INC	17%	0%	-	0%
1.0	HOSPIRA INC	HOSPIRA INC	17%	0%	-	0%
1.0	HOYA	HOYA FREE-FORM	17%	0%	-	0%
1.0	HOYA	HOYA OPTICS	17%	0%	-	0%
1.0	HOYA	HOYA XONENT	17%	0%	-	0%
1.0	INFINEON TECHNOLOGIES AG	INFINEON TECHNOLOGIES AG	17%	0%	-	20%
1.0	INGREDION INC	INGREDION INC	17%	10%	-	10%
1.0	INTEGRATED DEVICE TECHNOLOGY INC	INTEGRATED DEVICE TECHNOLOGY INC	17%	0%	-	20%
1.0	INVUE SECURITY PRODUCTS	INVUE SECURITY PRODUCTS	17%	0%	-	20%
1.0	IVC US	IVC US	17%	20%	-	0%
1.0	IXIA	IXIA	17%	10%	-	10%
1.0	JABIL CIRCUIT	JABIL CIRCUIT	17%	20%	-	0%
1.0	K2M GROUP	K2M GROUP HOLDINGS	17%	0%	-	0%



	<b>HOLDINGS INC</b>	<b>INC</b>				
<b>1.0</b>	<b>KAISER ALUMINUM CORP</b>	KAISER ALUMINUM CORP	17%	20%	-	0%
<b>1.0</b>	<b>KLA-TENCOR CORP</b>	KLA-TENCOR CORP	17%	20%	-	0%
<b>1.0</b>	<b>L'AIR LIQUIDE SA</b>	L'AIR LIQUIDE SA	17%	20%	-	0%
<b>1.0</b>	<b>LIDESTRI FOOD &amp; BEVERAGE</b>	LIDESTRI FOOD & BEVERAGE	17%	0%	-	0%
<b>1.0</b>	<b>LSI INDUSTRIES INC</b>	LSI INDUSTRIES INC	17%	20%	-	0%
<b>1.0</b>	<b>LUBRIZOL</b>	LUBRIZOL	17%	20%	-	0%
<b>1.0</b>	<b>LUMENTUM OPERATIONS LLC</b>	LUMENTUM OPERATIONS LLC	17%	20%	-	0%
<b>1.0</b>	<b>LUXOTTICA GROUP SPA</b>	LUXOTTICA GROUP SPA	17%	0%	1	0%
<b>1.0</b>	<b>MASIMO CORP</b>	MASIMO CORP	17%	20%	-	0%
<b>1.0</b>	<b>MAXWELL TECHNOLOGIES INC</b>	MAXWELL TECHNOLOGIES INC	17%	0%	-	0%
<b>1.0</b>	<b>NESTLE</b>	GERBER PRODUCTS COMPANY	17%	0%	-	0%
<b>1.0</b>	<b>NESTLE</b>	NESTLE PURINA PETCARE COMPANY	17%	0%	-	0%
<b>1.0</b>	<b>NESTLE</b>	NESTLE SA/AG	17%	0%	-	0%
<b>1.0</b>	<b>NESTLE</b>	NESTLÉ WATERS NORTH AMERICA	17%	0%	-	0%
<b>1.0</b>	<b>NETGEAR INC</b>	NETGEAR INC	17%	20%	-	0%
<b>1.0</b>	<b>NORTHGATE GONZÁLEZ MARKETS</b>	NORTHGATE GONZÁLEZ MARKETS	17%	0%	-	0%
<b>1.0</b>	<b>NUTRAMAX LABORATORIES INC</b>	NUTRAMAX LABORATORIES INC	17%	20%	-	0%
<b>1.0</b>	<b>NUVASIVE INC</b>	NUVASIVE INC	17%	20%	-	0%
<b>1.0</b>	<b>NXP SEMICONDUCTORS NV</b>	NXP SEMICONDUCTORS NV	17%	20%	-	0%
<b>1.0</b>	<b>OMYA NORTH AMERICA</b>	OMYA NORTH AMERICA	17%	0%	-	0%
<b>1.0</b>	<b>ONYX PHARMACEUTICALS INC</b>	ONYX PHARMACEUTICALS INC	17%	10%	-	10%
<b>1.0</b>	<b>OSI GROUP</b>	OSI GROUP	17%	0%	-	0%
<b>1.0</b>	<b>PANASONIC CORP</b>	PANASONIC CORP	17%	20%	-	0%
<b>1.0</b>	<b>PEPSICO INC</b>	PEPSICO INC	17%	20%	-	0%
<b>1.0</b>	<b>PERKINELMER INC</b>	PERKINELMER INC	17%	0%	-	20%
<b>1.0</b>	<b>PIN UP GIRL</b>	PIN UP GIRL	17%	20%	-	0%
<b>1.0</b>	<b>PUMA</b>	PUMA SE	17%	20%	-	0%
<b>1.0</b>	<b>RAYTHEON COMPANY</b>	RAYTHEON COMPANY	17%	20%	-	0%
<b>1.0</b>	<b>REAL MEX RESTAURANTS</b>	REAL MEX RESTAURANTS	17%	20%	-	0%
<b>1.0</b>	<b>RENTECH</b>	RENTECH INC	17%	0%	-	20%





1.0	RENTECH	RENTECH NITROGEN PARTNERS LP	17%	0%	-	20%
1.0	SAINT-GOBAIN	SAINT-GOBAIN ABRASIVES	17%	0%	-	0%
1.0	SAINT-GOBAIN	SAINT-GOBAIN PERFORMANCE PLASTICS CORP	17%	0%	-	0%
1.0	SANSUI AMERICA INC	SANSUI AMERICA INC	17%	20%	-	0%
1.0	SEAGATE TECHNOLOGY PLC	SEAGATE TECHNOLOGY PLC	17%	20%	-	0%
1.0	SKF AB	SKF AB	17%	20%	-	0%
1.0	SONIC AUTOMOTIVE INC	SONIC AUTOMOTIVE INC	17%	0%	-	20%
1.0	SPANSION INC	SPANSION INC	17%	0%	-	20%
1.0	SPECTRUM BRANDS HOLDINGS INC	SPECTRUM BRANDS HOLDINGS INC	17%	20%	-	0%
1.0	SPYCHER BROTHERS	SPYCHER BROTHERS	17%	20%	-	0%
1.0	STEIN MART INC	STEIN MART INC	17%	0%	-	0%
1.0	STORA ENSO OYJ	STORA ENSO OYJ	17%	20%	-	0%
1.0	STRATAS FOODS	STRATAS FOODS	17%	0%	-	0%
1.0	SYMANTEC CORP	SYMANTEC CORP	17%	20%	-	0%
1.0	TENNECO	TENNECO	17%	0%	-	20%
1.0	TEXTRON INC	BELL HELICOPTER TEXTRON INC	17%	0%	-	0%
1.0	THALESRAYTHEONSYST EMS	THALESRAYTHEONSYST EMS	17%	20%	-	0%
1.0	TOTAL SA	TOTAL SA	17%	20%	-	0%
1.0	UNITED STATES DISTILLED PRODUCTS	UNITED STATES DISTILLED PRODUCTS	17%	0%	-	0%
1.0	VITAMIN SHOPPE INC	VITAMIN SHOPPE INC	17%	20%	-	0%
1.0	W.M. BARR	W.M. BARR	17%	0%	-	0%
1.0	WARRIOR SPORTS	WARRIOR SPORTS	17%	0%	-	0%
0.5	AMKOR TECHNOLOGY INC	AMKOR TECHNOLOGY INC	8%	0%	-	10%
0.5	ARISTA NETWORKS INC	ARISTA NETWORKS INC	8%	10%	-	0%
0.5	ASTEC INDUSTRIES INC	ASTEC INDUSTRIES INC	8%	10%	-	0%
0.5	BSH HOME APPLIANCES	BSH HOME APPLIANCES	8%	0%	-	10%
0.5	CHEMOURS CO (THE)	CHEMOURS CO (THE)	8%	10%	-	0%
0.5	CHEVRON	CHEVRON	8%	10%	-	0%
0.5	CORPAC STEEL PRODUCTS CORP	CORPAC STEEL PRODUCTS CORP	8%	10%	-	0%
0.5	GARMIN	GARMIN	8%	10%	-	0%
0.5	GARMIN	GARMIN QATAR	8%	10%	-	0%
0.5	HERAEUS DEUTSCHLAND GMBH	HERAEUS DEUTSCHLAND GMBH	8%	10%	-	0%





	<b>&amp; CO</b>	<b>&amp; CO</b>				
<b>0.5</b>	<b>INTL FLAVORS &amp; FRAGRANCES</b>	INTL FLAVORS & FRAGRANCES	8%	0%	-	10%
<b>0.5</b>	<b>JOHNSON &amp; JOHNSON</b>	JOHNSON & JOHNSON	8%	10%	-	0%
<b>0.5</b>	<b>MAXIM INTEGRATED PRODUCTS INC</b>	MAXIM INTEGRATED PRODUCTS INC	8%	0%	1	0%
<b>0.5</b>	<b>METTLER-TOLEDO INTL INC</b>	METTLER-TOLEDO INTL INC	8%	10%	-	0%
<b>0.5</b>	<b>MICROSOFT CORP</b>	MICROSOFT CORP	8%	10%	-	0%
<b>0.5</b>	<b>MUELLER INDUSTRIES</b>	MUELLER INDUSTRIES	8%	10%	-	0%
<b>0.5</b>	<b>PALO ALTO NETWORKS INC</b>	PALO ALTO NETWORKS INC	8%	0%	-	10%
<b>0.5</b>	<b>PARKER-HANNIFIN CORP</b>	PARKER-HANNIFIN CORP	8%	10%	-	0%
<b>0.5</b>	<b>PENTAIR PLC</b>	PENTAIR PLC	8%	10%	-	0%
<b>0.5</b>	<b>PULSE ELECTRONICS</b>	PULSE ELECTRONICS	8%	0%	-	10%
<b>0.5</b>	<b>QUALCOMM INC</b>	QUALCOMM INC	8%	10%	-	0%
<b>0.5</b>	<b>SIDEL</b>	SIDEL	8%	10%	-	0%
<b>0.5</b>	<b>TE CONNECTIVITY LTD</b>	TE CONNECTIVITY LTD	8%	10%	-	0%
<b>0.5</b>	<b>VALEANT PHARMACEUTICALS INTL</b>	BAUSCH & LOMB INC	8%	10%	-	0%
<b>0.5</b>	<b>VALEANT PHARMACEUTICALS INTL</b>	VALEANT PHARMACEUTICALS INTL	8%	10%	-	0%
<b>0.5</b>	<b>WET SEAL INC</b>	WET SEAL INC	8%	10%	-	0%
<b>0.0</b>	<b>ACCESSORYGEEKS.COM</b>	ACCESSORYGEEKS.COM	0%	0%	-	0%
<b>0.0</b>	<b>ASTRAZENECA PLC</b>	ASTRAZENECA PLC	0%	0%	-	0%
<b>0.0</b>	<b>AXIALL CORP</b>	AXIALL CORP	0%	0%	-	0%
<b>0.0</b>	<b>BELK INC</b>	BELK INC	0%	0%	-	0%
<b>0.0</b>	<b>BOSE CORP</b>	BOSE CORP	0%	0%	-	0%
<b>0.0</b>	<b>BOSTON SCIENTIFIC CORP</b>	BOSTON SCIENTIFIC CORP	0%	0%	-	0%
<b>0.0</b>	<b>BRIDGESTONE AMERICAS</b>	BRIDGESTONE AMERICAS	0%	0%	-	0%
<b>0.0</b>	<b>CALIX INC</b>	CALIX INC	0%	0%	-	0%
<b>0.0</b>	<b>CARGILL</b>	CARGILL	0%	0%	-	0%
<b>0.0</b>	<b>CHR. HANSEN HOLDING A/S</b>	CHR. HANSEN HOLDING A/S	0%	0%	-	0%
<b>0.0</b>	<b>CLEAN ENERGY FUELS CORP</b>	CLEAN ENERGY FUELS CORP	0%	0%	-	0%
<b>0.0</b>	<b>COLUMBIA SPORTSWEAR CO</b>	COLUMBIA SPORTSWEAR CO	0%	0%	-	0%
<b>0.0</b>	<b>CONOCOPHILLIPS</b>	CONOCOPHILLIPS	0%	0%	-	0%
<b>0.0</b>	<b>CVS CAREMARK</b>	CVS CAREMARK	0%	0%	-	0%



0.0	CYTEC INDUSTRIES INC	CYTEC INDUSTRIES INC	0%	0%	-	0%
0.0	DAIMLER AG	DAIMLER TRUCKS NORTH AMERICA LLC	0%	0%	-	0%
0.0	DAIMLER AG	TEAM RUN SMART	0%	0%	-	0%
0.0	DELIAS INC	DELIAS INC	0%	0%	-	0%
0.0	DIXIE GROUP INC	DIXIE GROUP INC	0%	0%	-	0%
0.0	DOT HILL SYSTEMS CORP	DOT HILL SYSTEMS CORP	0%	0%	-	0%
0.0	DUNKIN' BRANDS GROUP INC	DUNKIN' BRANDS GROUP INC	0%	0%	-	0%
0.0	EISAI CO LTD	EISAI CO LTD	0%	0%	-	0%
0.0	FAF INC	FAF INC	0%	0%	-	0%
0.0	FARO TECHNOLOGIES INC	FARO TECHNOLOGIES INC	0%	0%	-	0%
0.0	FINISAR CORP	FINISAR CORP	0%	0%	-	0%
0.0	FLEXSTEEL INDUSTRIES INC	FLEXSTEEL INDUSTRIES INC	0%	0%	-	0%
0.0	FRES-CO SYSTEM USA INC	FRES-CO SYSTEM USA INC	0%	0%	-	0%
0.0	FUJIFILM HLDGS CORP	FUJIFILM HLDGS CORP	0%	0%	-	0%
0.0	GLAXOSMITHKLINE PLC	GLAXOSMITHKLINE PLC	0%	0%	-	0%
0.0	GLOBAL BRASS & COPPER HLDGS	GLOBAL BRASS & COPPER HLDGS	0%	0%	-	0%
0.0	HEATCRAFT REFRIGERATION PRODUCTS LLC	HEATCRAFT REFRIGERATION PRODUCTS LLC	0%	0%	-	0%
0.0	HERMÈS GROUP	HERMÈS GROUP	0%	0%	-	0%
0.0	HOOKE FURNITURE CORP	HOOKE FURNITURE CORP	0%	0%	-	0%
0.0	HOYA	HOYA SURGICAL OPTICS INC	0%	0%	-	0%
0.0	HUMANSKALE CORP	HUMANSKALE CORP	0%	0%	-	0%
0.0	HUNTINGTON INGALLS IND INC	HUNTINGTON INGALLS IND INC	0%	0%	-	0%
0.0	HYUNDAI	HYUNDAI MOTOR	0%	0%	-	0%
0.0	IDEXX LABS INC	IDEXX LABS INC	0%	0%	-	0%
0.0	INTELLIGRATED SYSTEMS INC	INTELLIGRATED SYSTEMS INC	0%	0%	-	0%
0.0	INTUITIVE SURGICAL INC	INTUITIVE SURGICAL INC	0%	0%	-	0%
0.0	JOHNSON CONTROLS INC	JOHNSON CONTROLS INC	0%	0%	-	0%
0.0	KEARNY MESA TOYOTA	KEARNY MESA TOYOTA	0%	0%	-	0%
0.0	LACOSTE	LACOSTE	0%	0%	-	0%
0.0	LEGO	LEGO	0%	0%	-	0%
0.0	LENOVO GROUP LTD	LENOVO GROUP LTD	0%	0%	-	0%



0.0	MARS INC	MARS INC	0%	0%	-	0%
0.0	MEDTRONIC PLC	MEDTRONIC PLC	0%	0%	-	0%
0.0	MERCURY SYSTEMS INC	MERCURY SYSTEMS INC	0%	0%	-	0%
0.0	MOREY'S SEAFOOD INTERNATIONAL LLC	MOREY'S SEAFOOD INTERNATIONAL LLC	0%	0%	-	0%
0.0	MULBERRY GROUP PLC	MULBERRY GROUP PLC	0%	0%	-	0%
0.0	NATIONAL OILWELL VARCO INC	NATIONAL OILWELL VARCO INC	0%	0%	-	0%
0.0	NINE WEST	NINE WEST	0%	0%	-	0%
0.0	NORTHROP GRUMMAN CORP	NORTHROP GRUMMAN CORP	0%	0%	-	0%
0.0	NOVO NORDISK A/S	NOVO NORDISK A/S	0%	0%	-	0%
0.0	OKI DATA AMERICAS INC	OKI DATA AMERICAS INC	0%	0%	-	0%
0.0	OSI SYSTEMS INC	OSI SYSTEMS INC	0%	0%	-	0%
0.0	OSI SYSTEMS INC	SPACELABS HEALTHCARE	0%	0%	-	0%
0.0	PACKAGING CORP OF AMERICA	PACKAGING CORP OF AMERICA	0%	0%	-	0%
0.0	PAKLAB	PAKLAB	0%	0%	-	0%
0.0	PARTY CITY HOLDINGS	PARTY CITY HOLDINGS	0%	0%	-	0%
0.0	PFIZER INC	PFIZER INC	0%	0%	-	0%
0.0	PITNEY BOWES INC	PITNEY BOWES INC	0%	0%	-	0%
0.0	POWER INTEGRATIONS INC	POWER INTEGRATIONS INC	0%	0%	-	0%
0.0	PRAXAIR INC	PRAXAIR INC	0%	0%	-	0%
0.0	QUANEX BUILDING PRODUCTS	QUANEX BUILDING PRODUCTS	0%	0%	-	0%
0.0	RICH PRODUCTS CORP	RICH PRODUCTS CORP	0%	0%	-	0%
0.0	SAMSUNG ELECTRONICS CO LTD	SAMSUNG ELECTRONICS CO LTD	0%	0%	-	0%
0.0	SANOFI	SANOFI	0%	0%	-	0%
0.0	SAPPI LTD	SAPPI LTD	0%	0%	-	0%
0.0	SASOL LTD	SASOL LTD	0%	0%	-	0%
0.0	SCHNEIDER ELECTRIC	SCHNEIDER ELECTRIC	0%	0%	-	0%
0.0	SCOTTS MIRACLE-GRO CO	SCOTTS MIRACLE-GRO CO	0%	0%	-	0%
0.0	SEATTLE GENETICS INC	SEATTLE GENETICS INC	0%	0%	-	0%
0.0	SIGNODE INDUSTRIAL GROUP	SIGNODE INDUSTRIAL GROUP	0%	0%	-	0%
0.0	SILICON GRAPHICS INTERNATIONAL CORP	SILICON GRAPHICS INTERNATIONAL CORP	0%	0%	-	0%
0.0	SIMPSON MANUFACTURING CO INC	SIMPSON MANUFACTURING CO INC	0%	0%	-	0%



0.0	<b>SOLARIS PAPER INC</b>	SOLARIS PAPER INC	0%	0%	-	0%
0.0	<b>SOUTHEASTERN MILLS</b>	SOUTHEASTERN MILLS	0%	0%	-	0%
0.0	<b>SPECTRANETICS CORP</b>	SPECTRANETICS CORP	0%	0%	-	0%
0.0	<b>STANDARD FURNITURE MANUFACTURING CO INC</b>	STANDARD FURNITURE MANUFACTURING CO INC	0%	0%	-	0%
0.0	<b>TE CONNECTIVITY LTD</b>	MEASUREMENT SPECIALTIES INC	0%	0%	-	0%
0.0	<b>THE SCHWAN FOOD COMPANY</b>	THE SCHWAN FOOD COMPANY	0%	0%	-	0%
0.0	<b>TTM TECHNOLOGIES INC</b>	TTM TECHNOLOGIES INC	0%	0%	-	0%
0.0	<b>TYSON FOODS INC</b>	TYSON FOODS INC	0%	0%	-	0%
0.0	<b>UNILEVER NV</b>	UNILEVER NV	0%	0%	-	0%
0.0	<b>USS-POSCO INDUSTRIES</b>	USS-POSCO INDUSTRIES	0%	0%	-	0%
0.0	<b>VALSPAR CORP</b>	VALSPAR CORP	0%	0%	-	0%
0.0	<b>VAN'S GIFTS INC</b>	VAN'S GIFTS INC	0%	0%	-	0%
0.0	<b>VARIAN MEDICAL SYSTEMS INC</b>	VARIAN MEDICAL SYSTEMS INC	0%	0%	-	0%
0.0	<b>VERITIV CORP</b>	BULKLEY DUNTON	0%	0%	-	0%
0.0	<b>VIAVI SOLUTIONS INC</b>	VIAVI SOLUTIONS INC	0%	0%	-	0%
0.0	<b>WEST PHARMACEUTICAL SVSC INC</b>	WEST PHARMACEUTICAL SVSC INC	0%	0%	-	0%
0.0	<b>WESTROCK CO</b>	WESTROCK CO	0%	0%	-	0%
0.0	<b>WEYERHAEUSER CO</b>	WEYERHAEUSER CO	0%	0%	-	0%
0.0	<b>WINDSOR INC</b>	WINDSOR INC	0%	0%	-	0%



## Appendix F: Potentially qualifying companies

Company Name	Industry Division	Revenue (in US\$ mil., FY2013-2015)
1-800-FLOWERS.COM	Retail Trade	1,121.51
3D SYSTEMS CORP	Manufacturing	653.65
A. H. BELO CORP	Manufacturing	272.79
A10 NETWORKS INC	Manufacturing	179.51
AAON INC	Manufacturing	356.32
ABAXIS INC	Manufacturing	202.59
ABBVIE INC	Manufacturing	19,960.00
ABIOMED INC	Manufacturing	230.31
ACCURAY INC	Manufacturing	379.80
ACCURIDE CORP	Manufacturing	705.18
ACME UNITED CORP	Manufacturing	107.22
ACORDA THERAPEUTICS INC	Manufacturing	401.48
ACTUANT CORP	Manufacturing	1,399.86
ACUITY BRANDS INC	Manufacturing	2,393.50
ADTRAN INC	Manufacturing	630.01
ADVANCE AUTO PARTS INC	Retail Trade	9,843.86
ADVANCED DRAINAGE SYSTEMS	Manufacturing	1,177.82
ADVANCED ENERGY INDS INC	Manufacturing	583.10
AEGERION PHARMACEUTICALS INC	Manufacturing	158.37
AEMETIS INC	Manufacturing	207.68
AEROVIRONMENT INC	Manufacturing	259.40
AFFYMETRIX INC	Manufacturing	349.02
AKORN INC	Manufacturing	593.08
AKZO NOBEL NV	Manufacturing	17,299.59
ALBANY INTL CORP	Manufacturing	745.35
ALBANY MOLECULAR RESH INC	Manufacturing	276.57
ALCATEL-LUCENT	Manufacturing	15,946.70
ALCOA INC	Manufacturing	23,906.00
ALEX LEE	Manufacturing	3,100.00
ALEXION PHARMACEUTICALS INC	Manufacturing	2,233.73
ALIGN TECHNOLOGY INC	Manufacturing	761.65
ALLEN EDMONDS	Manufacturing	145.30
ALLIANCE ONE INTERNATIONAL	Wholesale Trade	2,065.85
ALLIED MOTION TECHNOLOGIES	Manufacturing	249.68
ALLISON TRANSMISSION HLDGS	Manufacturing	2,127.40
ALON USA ENERGY INC	Manufacturing	6,704.05
ALON USA PARTNERS LP	Manufacturing	3,221.37
ALPHA AND OMEGA SEMICONDUCTR	Manufacturing	327.94
ALTRA INDUSTRIAL MOTION CORP	Manufacturing	819.82
ALUMINUM CORP CHINA LTD	Manufacturing	22,849.55



<b>AMAG PHARMACEUTICALS INC</b>	Manufacturing	124.38
<b>A-MARK PRECIOUS METALS</b>	Wholesale Trade	6,070.23
<b>AMBARELLA INC</b>	Manufacturing	218.28
<b>AMBEV SA</b>	Manufacturing	14,335.66
<b>AMCOR LTD</b>	Manufacturing	10,231.50
<b>AMERICAN AXLE &amp; MFG HOLDINGS</b>	Manufacturing	3,696.00
<b>AMERICAN RAILCAR INDS INC</b>	Manufacturing	733.01
<b>AMERICAN SCIENCE ENGINEERING</b>	Manufacturing	126.75
<b>AMERICAN VANGUARD CORP</b>	Manufacturing	298.63
<b>AMERICAN WOODMARK CORP</b>	Manufacturing	825.47
<b>AMERICA'S CAR-MART INC</b>	Retail Trade	472.57
<b>AMERIGAS PARTNERS -LP</b>	Retail Trade	3,712.94
<b>AMPCO-PITTSBURGH CORP</b>	Manufacturing	272.86
<b>AMPHENOL CORP</b>	Manufacturing	5,345.50
<b>AMPLIFY SNACK BRANDS</b>	Manufacturing	132.36
<b>AMWAY</b>	Manufacturing	11,800.00
<b>ANADIGICS INC</b>	Manufacturing	134.24
<b>ANALOGIC CORP</b>	Manufacturing	517.55
<b>ANDERSONS</b>	Wholesale Trade	4,540.07
<b>ANGIODYNAMICS INC</b>	Manufacturing	357.17
<b>ANIKA THERAPEUTICS INC</b>	Manufacturing	105.60
<b>APOGEE ENTERPRISES INC</b>	Manufacturing	933.94
<b>APPLIANCE RECYCLING CTR AMER</b>	Retail Trade	130.93
<b>APPLIED OPTOELECTRONICS INC</b>	Manufacturing	130.45
<b>APTARGROUP INC</b>	Manufacturing	2,597.81
<b>ARAMARK</b>	Retail Trade	14,832.91
<b>ARCTIC CAT INC</b>	Manufacturing	698.76
<b>ARIAD PHARMACEUTICALS INC</b>	Manufacturing	105.41
<b>ARK RESTAURANTS CORP</b>	Retail Trade	139.36
<b>ARMCO METALS HOLDINGS INC</b>	Manufacturing	124.19
<b>ARMORED AUTOGROUP INC</b>	Manufacturing	298.14
<b>ARMSTRONG WORLD INDUSTRIES</b>	Manufacturing	2,515.30
<b>AROTECH CORP</b>	Manufacturing	103.56
<b>ASBURY AUTOMOTIVE GROUP INC</b>	Retail Trade	5,867.70
<b>ASPEN AEROGELS INC</b>	Manufacturing	102.40
<b>ASSOCIATED MATERIALS LLC</b>	Manufacturing	1,186.97
<b>ASTRONICS CORP</b>	Manufacturing	661.04
<b>ATLAS COPCO AB</b>	Manufacturing	12,051.00
<b>ATRICURE INC</b>	Manufacturing	107.45
<b>ATRION CORP</b>	Manufacturing	140.76
<b>AU OPTRONICS CORP</b>	Manufacturing	12,917.06
<b>AUTONATION INC</b>	Retail Trade	19,108.80
<b>AVID TECHNOLOGY INC</b>	Manufacturing	530.25





<b>AZZ INC</b>	Manufacturing	816.69
<b>BABCOCK &amp; WILCOX ENTERPRISES</b>	Manufacturing	1,589.72
<b>BADGER METER INC</b>	Manufacturing	364.77
<b>BALLANTYNE STRONG INC</b>	Manufacturing	103.61
<b>BARNES &amp; NOBLE EDUCATION INC</b>	Retail Trade	1,773.00
<b>BASSETT FURNITURE INDS</b>	Manufacturing	340.74
<b>BEBE STORES INC</b>	Manufacturing	425.12
<b>BEL FUSE INC</b>	Manufacturing	487.08
<b>BEN E KEITH</b>	Manufacturing	3,300.00
<b>BIG ASS FANS</b>	Manufacturing	164.80
<b>BIGLARI HOLDINGS INC</b>	Retail Trade	793.81
<b>BIOGEN INC</b>	Manufacturing	9,703.32
<b>BIOSCRIP INC</b>	Retail Trade	984.06
<b>BIO-TECHNE CORP</b>	Manufacturing	452.25
<b>BJ'S RESTAURANTS INC</b>	Retail Trade	845.57
<b>BLOOMIN' BRANDS INC</b>	Retail Trade	4,442.71
<b>BLOUNT INTL INC</b>	Manufacturing	944.82
<b>BLUE BUFFALO PET PRODUCTS</b>	Manufacturing	917.76
<b>BLUE NILE INC</b>	Retail Trade	473.52
<b>BOB EVANS FARMS</b>	Retail Trade	1,349.19
<b>BODY CENTRAL CORP</b>	Retail Trade	283.56
<b>BOEING CO</b>	Manufacturing	90,762.00
<b>BOJANGLES' INC</b>	Retail Trade	430.47
<b>BOMBARDIER INC</b>	Manufacturing	20,111.00
<b>BONFIGLIOLI USA</b>	Manufacturing	128.60
<b>BOOKS-A-MILLION INC</b>	Retail Trade	474.08
<b>BOOT BARN HOLDINGS INC</b>	Retail Trade	402.68
<b>BORGWARNER INC</b>	Manufacturing	8,305.10
<b>BOULDER BRANDS INC</b>	Manufacturing	516.63
<b>BRADY CORP</b>	Manufacturing	1,225.03
<b>BRASKEM SA</b>	Manufacturing	17,329.14
<b>BRAVO BRIO RESTAURANT GP INC</b>	Retail Trade	408.31
<b>BRF SA</b>	Manufacturing	10,946.01
<b>BRINKER INTL INC</b>	Retail Trade	3,002.28
<b>BRITISH AMER TOBACCO PLC</b>	Manufacturing	22,010.16
<b>BROADWIND ENERGY INC</b>	Manufacturing	241.27
<b>BROOKS AUTOMATION INC</b>	Manufacturing	482.85
<b>BROOKSHIRE GROCERY</b>	Retail Trade	2,400.00
<b>BROWN-FORMAN BFB</b>	Manufacturing	3,134.00
<b>BRUKER CORP</b>	Manufacturing	1,808.90
<b>BUILDERS FIRSTSOURCE</b>	Manufacturing	1,604.10
<b>BURNHAM HOLDINGS INC</b>	Manufacturing	200.36
<b>BWX TECHNOLOGIES INC</b>	Manufacturing	2,923.02





<b>C&amp;S WHOLESALE GROCERS</b>	Manufacturing	25,000.00
<b>CABOT MICROELECTRONICS CORP</b>	Manufacturing	424.67
<b>CAFEPRESS INC</b>	Retail Trade	153.21
<b>CALGON CARBON CORP</b>	Manufacturing	555.10
<b>CAMBIUM LEARNING GROUP INC</b>	Manufacturing	141.75
<b>CAMBREX CORP</b>	Manufacturing	374.43
<b>CAMERON INTERNATIONAL CORP</b>	Manufacturing	10,381.00
<b>CANON INC</b>	Manufacturing	31,099.31
<b>CANTEL MEDICAL CORP</b>	Manufacturing	488.75
<b>CAPSTONE TURBINE CORP</b>	Manufacturing	115.46
<b>CARBO CERAMICS INC</b>	Manufacturing	648.33
<b>CARDINAL ETHANOL LLC</b>	Manufacturing	337.36
<b>CARDIOVASCULAR SYSTEMS INC</b>	Manufacturing	181.54
<b>CARPENTER TECHNOLOGY CORP</b>	Manufacturing	2,226.70
<b>CARROLS RESTAURANT GROUP INC</b>	Retail Trade	692.76
<b>CASEYS GENERAL STORES INC</b>	Retail Trade	7,052.22
<b>CASH AMERICA INTL INC</b>	Retail Trade	1,094.70
<b>CAVCO INDUSTRIES INC</b>	Manufacturing	566.66
<b>CECO ENVIRONMENTAL CORP</b>	Manufacturing	263.22
<b>CELGENE CORP</b>	Manufacturing	7,670.40
<b>CEMEX SAB DE CV</b>	Manufacturing	14,238.85
<b>CENCOSUD SA</b>	Retail Trade	17,872.85
<b>CENTRAL NATIONAL-GOTTESMAN</b>	Manufacturing	4,070.00
<b>CENTRUS ENERGY CORP</b>	Manufacturing	514.10
<b>CENTURY ALUMINUM CO</b>	Manufacturing	1,931.04
<b>CEPHEID INC</b>	Manufacturing	470.14
<b>CF INDUSTRIES HOLDINGS INC</b>	Manufacturing	4,743.20
<b>CHARMER SUNBELT GROUP</b>	Manufacturing	4,900.00
<b>CHASE CORP</b>	Manufacturing	224.01
<b>CHECKPOINT SYSTEMS INC</b>	Manufacturing	662.04
<b>CHEESECAKE FACTORY INC</b>	Retail Trade	1,976.62
<b>CHEMTURA CORP</b>	Manufacturing	2,190.00
<b>CHINA PETROLEUM &amp; CHEM CORP</b>	Manufacturing	455,454.66
<b>CHUY'S HOLDINGS INC</b>	Retail Trade	245.10
<b>CIENA CORP</b>	Manufacturing	2,288.29
<b>CIRCOR INTL INC</b>	Manufacturing	841.45
<b>CIRRUS LOGIC INC</b>	Manufacturing	916.57
<b>CNH INDUSTRIAL NV</b>	Manufacturing	31,196.00
<b>COCA-COLA BTLNG CONS</b>	Manufacturing	1,746.37
<b>COCA-COLA ENTERPRISES INC</b>	Manufacturing	8,264.00
<b>COGNEX CORP</b>	Manufacturing	486.27
<b>COLUMBUS MCKINNON CORP</b>	Manufacturing	579.64
<b>COMMERCIAL VEHICLE GROUP INC</b>	Manufacturing	839.74



COMMUNICATIONS SYSTEMS INC	Manufacturing	119.07
COMPANHIA BRASILEIRA DE DISTRIBUICAO-ADR	Retail Trade	24,667.77
COMPASS DIVERSIFIED HOLDINGS	Manufacturing	982.30
COMPX INTERNATIONAL INC	Manufacturing	103.85
COMTECH TELECOMMUN	Manufacturing	347.15
CONAIR	Manufacturing	2,230.00
CONMED CORP	Manufacturing	740.06
CONN'S INC	Retail Trade	1,482.65
CONRAD INDUSTRIES INC	Manufacturing	303.33
CONSTELLATION BRANDS	Manufacturing	6,028.00
CONTINENTAL AG	Manufacturing	41,755.35
CONTINENTAL BUILDING PRODS	Manufacturing	424.50
CONTINENTAL MATERIALS CORP	Manufacturing	131.88
CONTROL4 CORP	Manufacturing	148.80
COOPER COMPANIES INC	Manufacturing	1,717.78
COOPER TIRE & RUBBER CO	Manufacturing	3,424.81
COOPER-STANDARD HOLDINGS INC	Manufacturing	3,243.99
COPPEL CORP	Retail Trade	6,144.46
CORE MOLDING TECHNOLOGIES	Manufacturing	175.20
CRACKER BARREL OLD CTRY STOR	Retail Trade	2,683.68
CRAFT BREW ALLIANCE INC	Manufacturing	200.02
CRAY INC	Manufacturing	561.61
CREE INC	Manufacturing	1,632.51
CRESTWOOD EQUITY PARTNERS LP	Retail Trade	3,931.30
CRH PLC	Manufacturing	22,885.41
CROCS INC	Manufacturing	1,198.22
CROWN HOLDINGS INC	Manufacturing	9,097.00
CRYOLIFE INC	Manufacturing	144.64
CSW INDUSTRIALS INC -SPN	Manufacturing	261.83
CTS CORP	Manufacturing	404.02
CULP INC	Manufacturing	310.17
CVR ENERGY INC	Manufacturing	9,109.50
CVR PARTNERS LP	Manufacturing	298.67
CVR REFINING LP	Manufacturing	8,829.70
D&H DISTRIBUTING	Manufacturing	3,340.00
DAKTRONICS INC	Manufacturing	615.94
DANONE	Manufacturing	25,586.35
DARDEN RESTAURANTS INC	Retail Trade	6,764.00
DAVE & BUSTER'S ENTMT INC	Retail Trade	746.75
DEL FRISCOS RESTURNT GRP INC	Retail Trade	301.81
DELEK US HOLDINGS INC	Manufacturing	8,324.30
DELHAIZE GROUP - ETS DLHZ FR	Retail Trade	25,992.95
DELTIC TIMBER CORP	Manufacturing	227.36



<b>DELUXE CORP</b>	Manufacturing	1,674.08
<b>DENNYS CORP</b>	Retail Trade	472.30
<b>DEPOMED INC</b>	Manufacturing	390.36
<b>DEXCOM INC</b>	Manufacturing	259.20
<b>DGSE COMPANIES INC</b>	Retail Trade	108.54
<b>DIGI INTERNATIONAL INC</b>	Manufacturing	192.70
<b>DIPLOMAT PHARMACY INC</b>	Retail Trade	2,214.96
<b>DISCOUNT TIRE</b>	Retail Trade	3,870.00
<b>DIVERSIFIED RESTAURANT HLDGS</b>	Retail Trade	128.41
<b>DOLE FOOD COMPANY INC</b>	Manufacturing	4,480.00
<b>DONALDSON CO INC</b>	Manufacturing	2,473.47
<b>DOT FOODS</b>	Manufacturing	5,000.00
<b>DOUGLAS DYNAMICS INC</b>	Manufacturing	303.51
<b>DREW INDUSTRIES INC</b>	Manufacturing	1,190.78
<b>DRIL-QUIP INC</b>	Manufacturing	930.96
<b>DSP GROUP INC</b>	Manufacturing	143.04
<b>DUCOMMUN INC</b>	Manufacturing	742.05
<b>DYNACAST INTERNATIONAL INC</b>	Manufacturing	580.00
<b>DYNAMIC MATERIALS CORP</b>	Manufacturing	202.56
<b>EAGLE MATERIALS INC</b>	Manufacturing	1,066.37
<b>EBY-BROWN</b>	Manufacturing	5,300.00
<b>ECHOSTAR CORP</b>	Manufacturing	3,445.58
<b>ECOPETROL SA</b>	Manufacturing	29,327.73
<b>EL POLLO LOCO HOLDINGS INC</b>	Retail Trade	344.86
<b>ELECTRO SCIENTIFIC INDS INC</b>	Manufacturing	159.12
<b>ELECTRONICS FOR IMAGING INC</b>	Manufacturing	790.43
<b>ELIZABETH ARDEN INC</b>	Manufacturing	999.33
<b>EMC CORP/MA</b>	Manufacturing	24,440.00
<b>EMERGE ENERGY SERVICES LP</b>	Manufacturing	1,061.14
<b>EMERGENT BIOSOLUTIONS INC</b>	Manufacturing	450.14
<b>ENDOLOGIX INC</b>	Manufacturing	147.59
<b>ENERSYS INC</b>	Manufacturing	2,505.51
<b>ENNIS INC</b>	Manufacturing	580.24
<b>ENOVATION CONTROLS INC -REDH</b>	Manufacturing	255.58
<b>ENVIVA PARTNERS LP</b>	Manufacturing	290.14
<b>ERICSSON</b>	Manufacturing	29,137.07
<b>EUROMOTORS INC</b>	Retail Trade	122.97
<b>EVINE LIVE INC</b>	Retail Trade	674.62
<b>EXACTECH INC</b>	Manufacturing	248.37
<b>EXPRESS SCRIPTS HOLDING CO</b>	Retail Trade	100,887.10
<b>EXTERRAN HOLDINGS INC</b>	Manufacturing	2,899.74
<b>EXTREME NETWORKS INC</b>	Manufacturing	552.94
<b>EXXON MOBIL CORP</b>	Manufacturing	364,763.00



<b>EZCORP INC</b>	Retail Trade	988.53
<b>FAIRCHILD SEMICONDUCTOR INTL INC</b>	Manufacturing	1,433.40
<b>FAIRWAY GROUP HOLDINGS</b>	Retail Trade	797.56
<b>FAMOUS DAVES OF AMERICA INC</b>	Retail Trade	149.36
<b>FARMER BROS CO</b>	Manufacturing	528.38
<b>FASTENAL CO</b>	Retail Trade	3,733.51
<b>FEDERAL-MOGUL HOLDINGS CORP</b>	Manufacturing	7,317.00
<b>FEDERAL-MOGUL MOTORPRTS -SPN</b>	Manufacturing	2,935.00
<b>FIBROGEN INC</b>	Manufacturing	137.60
<b>FIESTA RESTAURANT GROUP INC</b>	Retail Trade	611.14
<b>FIRST CASH FINANCIAL SVCS</b>	Retail Trade	712.88
<b>FITBIT INC</b>	Manufacturing	753.55
<b>FIVE BELOW INC</b>	Retail Trade	680.22
<b>FLOTEK INDUSTRIES INC</b>	Manufacturing	449.16
<b>FLOWERS FOODS INC</b>	Manufacturing	3,748.97
<b>FLUIDIGM CORP</b>	Manufacturing	116.46
<b>FMC TECHNOLOGIES INC</b>	Manufacturing	7,942.60
<b>FOGO DE CHAO INC</b>	Retail Trade	262.28
<b>FOMENTO ECONOMICO MEXICANO</b>	Manufacturing	17,860.95
<b>FORTUNE BRANDS HOME &amp; SECUR</b>	Manufacturing	4,013.60
<b>FORUM ENERGY TECH INC</b>	Manufacturing	1,739.72
<b>FOSTER FARMS</b>	Manufacturing	2,200.00
<b>FRANCESCAS HOLDINGS CORP</b>	Retail Trade	377.50
<b>FREDS INC</b>	Retail Trade	1,970.05
<b>FREIGHTCAR AMERICA INC</b>	Manufacturing	598.52
<b>FRIEDMAN INDUSTRIES INC</b>	Manufacturing	108.32
<b>FTD COMPANIES INC</b>	Retail Trade	640.51
<b>FUEL SYSTEMS SOLUTIONS INC</b>	Manufacturing	339.13
<b>FUEL TECH INC</b>	Manufacturing	109.34
<b>FUELCELL ENERGY INC</b>	Manufacturing	180.29
<b>FUJI HEAVY INDUSTRIES LTD</b>	Manufacturing	23,990.61
<b>FUTUREFUEL CORP</b>	Manufacturing	341.84
<b>GAIAM INC</b>	Retail Trade	166.69
<b>GANNETT CO INC</b>	Manufacturing	3,171.88
<b>GARLAND INDUSTRIES</b>	Manufacturing	374.10
<b>GAZPROM PJSC</b>	Manufacturing	98,995.55
<b>GENERAL MILLS INC</b>	Manufacturing	17,630.30
<b>GENERAL WIRELESS</b>	Retail Trade	3,434.30
<b>GENESCO INC</b>	Retail Trade	2,859.84
<b>GENESIS HEALTHCARE</b>	Manufacturing	4,680.00
<b>GENOMIC HEALTH INC</b>	Manufacturing	275.71
<b>GENTHERM INC</b>	Manufacturing	811.30
<b>GEOSPACE TECHNOLOGIES CORP</b>	Manufacturing	236.91



<b>GERDAU SA</b>	Manufacturing	16,017.14
<b>GIBRALTAR INDUSTRIES INC</b>	Manufacturing	862.09
<b>GLACIER WATER SERVICES</b>	Retail Trade	132.92
<b>GLAZER'S</b>	Manufacturing	4,002.00
<b>GLOBE SPECIALTY METALS INC</b>	Manufacturing	800.77
<b>GLOBUS MEDICAL INC</b>	Manufacturing	474.37
<b>GNC HOLDINGS INC</b>	Retail Trade	2,613.15
<b>GOLDEN ENTERPRISES</b>	Manufacturing	135.90
<b>GOLDEN LIVING</b>	Manufacturing	2,900.00
<b>GOLDEN STATE FOODS</b>	Manufacturing	6,402.00
<b>GOLUB</b>	Retail Trade	3,470.00
<b>GORDMANS STORES INC</b>	Retail Trade	643.23
<b>GORDON FOOD SERVICE</b>	Manufacturing	9,752.00
<b>GRACE (W R) &amp; CO</b>	Manufacturing	3,243.00
<b>GRAHAM CORP</b>	Manufacturing	135.17
<b>GRANITE CITY FOOD &amp; BREWERY</b>	Retail Trade	136.16
<b>GRANITE FALLS ENERGY LLC</b>	Manufacturing	300.96
<b>GREAT ATLANTIC &amp; PACIFIC TEA</b>	Retail Trade	6,000.00
<b>GREAT LAKES CHEESE</b>	Manufacturing	2,250.00
<b>GREATBATCH INC</b>	Manufacturing	687.79
<b>GRIFFON CORP</b>	Manufacturing	1,991.81
<b>GROCERS SUPPLY</b>	Manufacturing	3,500.00
<b>GSE HOLDING INC</b>	Manufacturing	417.65
<b>GSI GROUP INC</b>	Manufacturing	364.71
<b>GT ADVANCED TECHNOLOGIES INC</b>	Manufacturing	298.97
<b>GUESS INC</b>	Manufacturing	2,306.53
<b>GULF ISLAND FABRICATION INC</b>	Manufacturing	506.64
<b>HABIT RESTAURANTS INC (THE)</b>	Retail Trade	174.62
<b>HAEMONETICS CORP</b>	Manufacturing	910.37
<b>HANDY &amp; HARMAN LTD</b>	Manufacturing	600.47
<b>HARSCO CORP</b>	Manufacturing	2,065.74
<b>HARVARD BIOSCIENCE INC</b>	Manufacturing	108.66
<b>HASBRO INC</b>	Manufacturing	4,277.21
<b>HAVERTY FURNITURE</b>	Retail Trade	768.71
<b>HAYNES INTERNATIONAL INC</b>	Manufacturing	455.41
<b>HC2 HOLDINGS INC</b>	Manufacturing	543.20
<b>HCR MANORCARE</b>	Manufacturing	5,000.00
<b>HE BUTT GROCERY</b>	Retail Trade	20,000.00
<b>HEADWATERS INC</b>	Manufacturing	791.45
<b>HEARTWARE INTERNATIONAL INC</b>	Manufacturing	278.42
<b>HEICO CORP</b>	Manufacturing	1,132.31
<b>HEINEKEN NV</b>	Manufacturing	23,302.90
<b>HELEN OF TROY LTD</b>	Manufacturing	1,445.13



HERON LAKE BIOENERGY LLC	Manufacturing	149.42
HESS CORP	Manufacturing	10,737.00
HEXCEL CORP	Manufacturing	1,855.50
HHGREGG INC	Retail Trade	2,129.37
HIBBETT SPORTS INC	Retail Trade	913.49
HITACHI LTD	Manufacturing	81,376.88
HOBBY LOBBY STORES	Retail Trade	3,300.00
HOLOGIC INC	Manufacturing	2,530.70
HORSEHEAD HOLDING CORP	Manufacturing	453.94
HOT TOPIC INC	Retail Trade	741.74
HOUCHEM INDUSTRIES	Retail Trade	3,182.00
HOUGHTON MIFFLIN HARCOURT CO	Manufacturing	1,372.32
HP HOOD	Manufacturing	2,100.00
HRG GROUP INC	Manufacturing	5,963.00
HSN INC	Retail Trade	3,583.03
HT HACKNEY	Manufacturing	4,000.00
HURCO COMPANIES INC	Manufacturing	222.30
HUTCHINSON TECHNOLOGY INC	Manufacturing	261.09
HY-VEE	Retail Trade	8,000.00
IASIS HEALTHCARE	Manufacturing	2,550.00
ICC INDUSTRIES	Manufacturing	3,080.00
IEC ELECTRONICS CORP	Manufacturing	135.62
IGNITE RESTAURANT GROUP INC	Retail Trade	837.19
II-VI INC	Manufacturing	741.96
IMPERIAL TOBACCO GROUP PLC	Manufacturing	22,216.53
INCYTE CORP	Manufacturing	511.50
INFINITY PHARMACEUTICALS INC	Manufacturing	165.00
INGLES MARKETS INC	Retail Trade	3,835.99
INNOSPEC INC	Manufacturing	960.90
INOGEN INC	Manufacturing	112.54
INSTEEL INDUSTRIES	Manufacturing	408.98
INSYS THERAPEUTICS INC	Manufacturing	222.13
INTEGRA LIFESCIENCES HLDGS	Manufacturing	928.31
INTEGRATED DRILLING EQPT HLD	Manufacturing	103.75
INTER PARFUMS INC	Manufacturing	499.26
INTERFACE INC	Manufacturing	1,003.90
INTERNATIONAL TEXTILE GRP INC	Manufacturing	595.45
INTERNATIONAL WIRE GRP HLDGS	Manufacturing	766.55
INTERTECH GROUP	Manufacturing	4,150.00
INVACARE CORP	Manufacturing	1,270.16
INVENSENSE INC	Manufacturing	372.02
INVENTURE FOODS INC	Manufacturing	285.66
ION GEOPHYSICAL CORP	Manufacturing	509.56





ISIS PHARMACEUTICALS INC	Manufacturing	214.16
IXYS CORP	Manufacturing	338.77
J & J SNACK FOODS CORP	Manufacturing	919.45
J. ALEXANDER'S HLDGS -REDH	Retail Trade	188.22
JACK IN THE BOX INC	Retail Trade	1,484.13
JAMBA INC	Retail Trade	218.05
JANUS INTERNATIONAL GROUP	Manufacturing	147.20
JASON INDUSTRIES INC	Manufacturing	702.49
JD HEISKELL & CO	Manufacturing	5,000.00
JD.COM INC -ADR	Retail Trade	18,535.01
JMC STEEL	Manufacturing	2,100.00
JOE'S JEANS INC	Manufacturing	188.76
JOURNAL MEDIA GROUP INC	Manufacturing	370.33
JOY GLOBAL INC	Manufacturing	3,778.31
JR SIMPLOT	Manufacturing	5,800.00
KADANT INC	Manufacturing	402.13
KB HOME	Manufacturing	2,400.95
KEMET CORP	Manufacturing	823.19
KENNAMETAL INC	Manufacturing	2,647.20
KEWAUNEE SCIENTIFIC CORP	Manufacturing	118.83
KEY TRONIC CORP	Manufacturing	434.00
KID BRANDS INC	Manufacturing	188.16
KIMBALL ELECTRONICS INC	Manufacturing	741.53
KIMBALL INTERNATIONAL	Manufacturing	600.87
KINGFISHER PLC	Retail Trade	16,477.51
KOCH FOODS	Manufacturing	3,000.00
KONA GRILL INC	Retail Trade	119.10
KONINKLIJKE AHOLD NV	Retail Trade	39,659.82
KONINKLIJKE PHILIPS N.V	Public Administration	25,885.25
KOPPERS HOLDINGS INC	Manufacturing	1,555.00
KRATOS DEFENSE & SECURITY SOLUTIONS INC	Manufacturing	868.00
KRONOS WORLDWIDE INC	Manufacturing	1,651.90
K-SWISS INC	Manufacturing	222.85
KUBOTA CORP	Manufacturing	13,228.89
K-VA-T FOOD STORES	Retail Trade	2,200.00
LAFARGE SA	Manufacturing	15,541.31
LANNETT CO INC	Manufacturing	406.84
LANTHEUS HOLDINGS INC	Manufacturing	301.60
LATTICE SEMICONDUCTOR CORP	Manufacturing	366.13
LDR HOLDING CORP	Manufacturing	141.25
LEE ENTERPRISES INC	Manufacturing	656.70
LEGACY HOUSING	Manufacturing	114.10
LEGGETT & PLATT INC	Manufacturing	3,782.30





LEUCADIA NATIONAL CORP	Manufacturing	12,334.91
LEXMARK INTL INC	Manufacturing	3,727.60
LG DISPLAY CO LTD	Manufacturing	24,251.33
LIFE CARE CENTERS OF AMERICA	Manufacturing	2,900.00
LIFETIME BRANDS INC	Manufacturing	586.01
LIFEVANTAGE CORP	Manufacturing	213.97
LIFEWAY FOODS INC	Manufacturing	118.96
LMI AEROSPACE INC	Manufacturing	387.82
LOJACK CORP	Manufacturing	133.57
LOUISIANA-PACIFIC CORP	Manufacturing	1,934.80
LRI HOLDINGS INC	Retail Trade	640.88
LSB INDUSTRIES INC	Manufacturing	732.51
LUBYS INC	Retail Trade	394.38
LUKOIL PJSC	Manufacturing	122,803.00
LYDALL INC	Manufacturing	535.83
M/A-COM TECHNOLOGY SOLUTIONS	Manufacturing	418.66
MADDEN STEVEN LTD	Manufacturing	1,348.67
MAGNA INTERNATIONAL INC	Manufacturing	36,641.00
MAGNETEK INC	Manufacturing	109.71
MAINES PAPER & FOOD SERVICE	Manufacturing	3,500.00
MALIBU BOATS INC	Manufacturing	190.94
MANITEX INTERNATIONAL INC	Manufacturing	264.08
MANNATECH INC	Manufacturing	190.08
MARATHON PETROLEUM CORP	Manufacturing	91,132.00
MARINE PRODUCTS CORP	Manufacturing	171.05
MARINEMAX INC	Retail Trade	624.69
MASONITE INTERNATIONAL CORP	Manufacturing	1,837.70
MATTHEWS INTL CORP	Manufacturing	1,106.60
MATTRESS FIRM HOLDING CORP	Retail Trade	1,810.61
MAXLINEAR INC	Manufacturing	133.11
MCBC HOLDINGS INC	Manufacturing	177.59
MCCLATCHY CO	Manufacturing	1,146.55
MCDERMOTT INTL INC	Manufacturing	2,300.89
MCRAE INDUSTRIES	Manufacturing	103.63
MEDICINES CO	Manufacturing	724.41
MEDIFAST INC	Manufacturing	285.29
MEDIVATION INC	Manufacturing	710.49
MEREDITH CORP	Manufacturing	1,594.18
MERIDIAN BIOSCIENCE INC	Manufacturing	188.83
MERITAGE HOSPITALITY GROUP	Retail Trade	137.78
MERRIMACK PHARMACEUTICALS	Manufacturing	102.76
METALDYNE PERFORMANCE GROUP	Manufacturing	2,717.00
METALICO INC	Manufacturing	476.04



<b>MFRI INC</b>	Manufacturing	194.86
<b>MICROSEMI CORP</b>	Manufacturing	1,138.26
<b>MIDDLEBY CORP</b>	Manufacturing	1,636.54
<b>MILACRON HOLDINGS CORP</b>	Manufacturing	1,211.30
<b>MILLER INDUSTRIES INC/TN</b>	Manufacturing	492.78
<b>MIMEDX GROUP INC</b>	Manufacturing	118.22
<b>MINDSPEED TECHNOLOGIES INC</b>	Manufacturing	99.25
<b>MOBILEONE</b>	Retail Trade	100.50
<b>MOLSON COORS BREWING CO</b>	Manufacturing	4,146.30
<b>MOLYCORP INC</b>	Manufacturing	475.61
<b>MONARCH CEMENT CO</b>	Manufacturing	146.90
<b>MONOLITHIC POWER SYSTEMS INC</b>	Manufacturing	282.54
<b>MONSTER BEVERAGE CORP</b>	Manufacturing	2,464.87
<b>MOSAIC CO</b>	Manufacturing	9,055.80
<b>MOTORCAR PARTS OF AMER INC</b>	Manufacturing	301.71
<b>MOTOROLA SOLUTIONS INC</b>	Manufacturing	5,881.00
<b>MOVADO GROUP INC</b>	Manufacturing	586.98
<b>MRV COMMUNICATIONS INC</b>	Manufacturing	172.06
<b>MSA SAFETY INC</b>	Manufacturing	1,133.89
<b>MUELLER WATER PRODUCTS INC</b>	Manufacturing	1,184.70
<b>MULTI PACKAGING SOLTNS-REDH</b>	Manufacturing	888.29
<b>MULTI-COLOR CORP</b>	Manufacturing	810.77
<b>MURGADO AUTOMOTIVE GROUP</b>	Retail Trade	269.60
<b>MURPHY OIL CORP</b>	Manufacturing	5,288.93
<b>MUSCLEPHARM CORP</b>	Manufacturing	177.39
<b>MYERS INDUSTRIES INC</b>	Manufacturing	623.65
<b>MYRIAD GENETICS INC</b>	Manufacturing	723.10
<b>NACCO INDUSTRIES</b>	Manufacturing	896.78
<b>NANOMETRICS INC</b>	Manufacturing	166.44
<b>NATIONAL BEVERAGE CORP</b>	Manufacturing	645.83
<b>NATURAL GROCERS VITAMIN CTGE</b>	Retail Trade	520.67
<b>NATURAL HEALTH TRENDS CORP</b>	Manufacturing	124.59
<b>NATURES SUNSHINE PRODS INC</b>	Manufacturing	366.37
<b>NATUS MEDICAL INC</b>	Manufacturing	355.83
<b>NAUTILUS INC</b>	Manufacturing	274.45
<b>NCI BUILDING SYSTEMS INC</b>	Manufacturing	1,370.54
<b>NCR CORP</b>	Manufacturing	6,591.00
<b>NEBRASKA BOOK HLDGS INC</b>	Retail Trade	400.47
<b>NEKTAR THERAPEUTICS</b>	Manufacturing	200.71
<b>NEOGEN CORP</b>	Manufacturing	283.22
<b>NEW MEDIA INVESTMENT GROUP</b>	Manufacturing	652.32
<b>NEW YORK TIMES CO</b>	Manufacturing	1,588.53
<b>NEWLINK GENETICS CORP</b>	Manufacturing	172.59



<b>NEWS CORP</b>	Manufacturing	8,633.00
<b>NGL ENERGY PARTNERS LP</b>	Retail Trade	16,802.06
<b>NIMBLE STORAGE INC</b>	Manufacturing	227.67
<b>NISSAN MOTOR CO LTD</b>	Manufacturing	94,825.00
<b>NL INDUSTRIES</b>	Manufacturing	103.85
<b>NN INC</b>	Manufacturing	488.60
<b>NOKIA CORP</b>	Manufacturing	15,571.57
<b>NOODLES &amp; CO</b>	Retail Trade	403.74
<b>NORANDA ALUMINUM HOLDING CP</b>	Manufacturing	1,355.10
<b>NORSK HYDRO ASA</b>	Manufacturing	10,413.15
<b>NORTECH SYSTEMS INC</b>	Manufacturing	112.04
<b>NORTHERN TIER ENERGY LP</b>	Manufacturing	5,159.60
<b>NOVATEL WIRELESS INC</b>	Manufacturing	185.25
<b>NOVELIS INC</b>	Manufacturing	11,147.00
<b>NPC RESTAURANT HOLDINGS LLC</b>	Retail Trade	1,179.90
<b>NU SKIN ENTERPRISES</b>	Manufacturing	2,569.50
<b>NUSTAR ENERGY LP</b>	Manufacturing	3,075.12
<b>NUTRISYSTEM INC</b>	Retail Trade	403.08
<b>NVIDIA CORP</b>	Manufacturing	4,681.51
<b>OBAGI MEDICAL PRODUCTS INC</b>	Manufacturing	120.68
<b>OCI PARTNERS LP</b>	Manufacturing	402.78
<b>OCLARO INC</b>	Manufacturing	390.87
<b>OIL STATES INTL INC</b>	Manufacturing	1,819.61
<b>OLIVET INTERNATIONAL INC</b>	Manufacturing	145.36
<b>OLLIE'S BARGAIN OUTLET HLDGS</b>	Retail Trade	637.98
<b>OM GROUP INC</b>	Manufacturing	1,067.50
<b>OMEGA PROTEIN CORP</b>	Manufacturing	308.64
<b>OMNICELL INC</b>	Manufacturing	440.90
<b>OMNOVA SOLUTIONS INC</b>	Manufacturing	987.40
<b>OPLINK COMMUNICATIONS INC</b>	Manufacturing	204.78
<b>ORASURE TECHNOLOGIES INC</b>	Manufacturing	106.46
<b>ORCHIDS PAPER PRODUCTS</b>	Manufacturing	142.72
<b>OSHKOSH CORP</b>	Manufacturing	6,817.10
<b>PACIFIC ETHANOL INC</b>	Manufacturing	1,107.41
<b>PACIRA PHARMACEUTICALS INC</b>	Manufacturing	197.67
<b>PACKSIZE INTERNATIONAL</b>	Manufacturing	141.70
<b>PAR PETROLEUM CORP</b>	Manufacturing	3,108.03
<b>PAR TECHNOLOGY CORP</b>	Manufacturing	233.61
<b>PARK ELECTROCHEMICAL CORP</b>	Manufacturing	162.09
<b>PARTY CITY HOLDCO INC</b>	Manufacturing	2,271.26
<b>PATRICK INDUSTRIES INC</b>	Manufacturing	735.72
<b>PAYLESS HOLDINGS</b>	Retail Trade	2,800.00
<b>PBF ENERGY INC</b>	Manufacturing	19,828.16



PC CONNECTION INC	Retail Trade	2,463.34
PCM INC	Retail Trade	1,356.36
PCTEL INC	Manufacturing	107.16
PDF SOLUTIONS INC	Manufacturing	100.16
PDL BIOPHARMA INC	Manufacturing	482.46
PENSKE AUTOMOTIVE GROUP INC	Retail Trade	17,177.20
PERFORMANCE FOOD GROUP	Manufacturing	13,782.00
PERFORMANCE SPORTS GROUP LTD	Manufacturing	654.69
PERFUMANIA HOLDINGS INC	Retail Trade	583.96
PERNIX THERAPEUTICS HOLDINGS	Manufacturing	123.00
PETMED EXPRESS INC	Retail Trade	229.40
PETROCHINA CO LTD	Manufacturing	367,946.69
PETROLEO BRASILEIRO SA- PETR	Manufacturing	143,657.00
PGT INC	Manufacturing	306.39
PHILADELPHIA ENG SLTNS -REDH	Manufacturing	13,627.62
PHILIP MORRIS INTERNATIONAL	Manufacturing	29,767.00
PHOTOMEDEX INC	Manufacturing	163.54
PHOTRONICS INC	Manufacturing	455.53
PIER 1 IMPORTS INC/DE	Retail Trade	1,865.78
PILGRIM'S PRIDE CORP	Manufacturing	8,583.37
PINNACLE FOODS INC	Manufacturing	2,591.18
PLANAR SYSTEMS INC	Manufacturing	179.00
PLATFORM SPECIALTY PRODUCTS	Manufacturing	843.20
PLUM CREEK TIMBER CO INC	Manufacturing	1,476.00
PLY GEM HOLDINGS INC	Manufacturing	1,566.64
PMFG INC	Manufacturing	130.65
POLARIS INDUSTRIES INC	Manufacturing	4,479.65
POSCO	Manufacturing	59,363.11
POTBELLY CORP	Retail Trade	326.98
POTLATCH CORP	Manufacturing	606.95
POWELL INDUSTRIES INC	Manufacturing	647.81
POWER SOLUTIONS INTL INC	Manufacturing	348.00
PRECISION CASTPARTS CORP	Manufacturing	10,005.00
PRICESMART INC	Retail Trade	2,517.57
PRIMO WATER CORP	Manufacturing	106.32
PRO MACH	Manufacturing	496.60
PROJECTOR SUPERCENTER	Retail Trade	105.00
PROTO LABS INC	Manufacturing	209.58
PUBLIX SUPER MARKETS INC	Retail Trade	30,802.47
PURE STORAGE INC -REDH	Manufacturing	174.45
QUAD/GRAPHICS INC	Manufacturing	4,862.40
QUAKER CHEMICAL CORP	Manufacturing	765.86
QUALITY KING DISTRIBUTORS	Manufacturing	3,200.00



QUALITY SYSTEMS INC	Manufacturing	490.22
RADISYS CORP	Manufacturing	192.74
RAMBUS INC	Manufacturing	296.56
RAVEN INDUSTRIES INC	Manufacturing	378.15
RAYONIER ADVANCED MATERIALS	Manufacturing	957.69
RBC BEARINGS INC	Manufacturing	445.28
RCI HOSPITALITY HLDGS INC	Retail Trade	129.17
REAL GOODS SOLAR INC	Manufacturing	101.34
REALD INC	Manufacturing	163.46
RED ROBIN GOURMET BURGERS	Retail Trade	1,146.10
RED TRAIL ENERGY LLC	Manufacturing	139.12
RELIANCE STEEL & ALUMINUM	Wholesale Trade	10,451.60
REMY INTERNATIONAL INC	Manufacturing	1,182.33
RENEWABLE ENERGY GROUP INC	Manufacturing	1,273.83
REPUBLIC NATIONAL DISTRIBUTING COMPANY	Manufacturing	5,100.00
REVLON INC	Manufacturing	1,941.00
REX AMERICAN RESOURCES CORP	Manufacturing	572.23
REYES HOLDINGS	Manufacturing	23,000.00
RIVERBED TECHNOLOGY INC	Manufacturing	1,089.21
ROCKWELL COLLINS INC	Manufacturing	4,979.00
ROCKY BRANDS INC	Manufacturing	286.24
ROFIN SINAR TECHNOLOGIES INC	Manufacturing	530.12
ROPER TECHNOLOGIES INC	Manufacturing	3,551.79
ROSEN'S DIVERSIFIED	Manufacturing	3,600.00
ROUNDY'S INC	Retail Trade	3,855.16
RUBY TUESDAY INC	Retail Trade	1,126.57
RUCKUS WIRELESS INC	Manufacturing	326.92
RUSSELL CELLULAR	Retail Trade	169.20
RUTHS HOSPITALITY GROUP INC	Retail Trade	346.10
RYLAND GROUP INC	Manufacturing	2,615.07
SAGENT PHARMACEUTICALS INC	Manufacturing	289.78
SANDERSON FARMS INC	Manufacturing	2,774.85
SANFILIPPO JOHN B&SON	Manufacturing	887.25
SANMINA CORP	Manufacturing	6,215.11
SCHNITZER STEEL INDUSTRIES	Wholesale Trade	2,543.58
SCHNUCK MARKETS	Retail Trade	2,600.00
SCHOLASTIC CORP	Manufacturing	1,635.80
SCHOOL SPECIALTY INC	Retail Trade	621.87
SCHREIBER FOODS	Manufacturing	4,800.00
SCHWEITZER-MAUDUIT INTL INC	Manufacturing	794.30
SCIENTIFIC GAMES CORP	Manufacturing	1,786.40
SCOULAR	Manufacturing	6,200.00
SCRAP METAL SERVICES	Manufacturing	409.40



SEALED AIR CORP	Manufacturing	7,750.50
SEASPINE HOLDINGS CORP	Manufacturing	138.70
SERVICES GROUP OF AMERICA	Manufacturing	3,130.00
SHAKE SHACK INC	Retail Trade	118.53
SHAMROCK FOODS	Manufacturing	2,430.00
SHARP CORP	Manufacturing	23,226.54
SHI INTERNATIONAL	Manufacturing	5,000.00
SHILOH INDUSTRIES INC	Manufacturing	878.74
SHOE CARNIVAL INC	Retail Trade	940.16
SHOPKO STORES	Retail Trade	3,000.00
SIFCO INDUSTRIES	Manufacturing	119.65
SIGMA-ALDRICH CORP	Manufacturing	2,785.00
SIGNATURE SYSTEMS GROUP	Manufacturing	102.00
SILGAN HOLDINGS INC	Manufacturing	3,911.79
SINOPEC SHANGHAI PETROCHEM	Manufacturing	14,985.67
SIRONA DENTAL SYSTEMS INC	Manufacturing	1,171.10
SKYLINE CORP	Manufacturing	191.73
SL INDUSTRIES INC	Manufacturing	204.42
SMITH & WESSON HOLDING CORP	Manufacturing	551.86
SNAPAV	Manufacturing	166.40
SODEXO	Retail Trade	23,748.90
SOLARCITY CORP	Manufacturing	255.03
SOLTA MEDICAL INC	Manufacturing	144.54
SONIC CORP	Retail Trade	552.35
SONY CORP	Manufacturing	68,488.50
SOUTHEASTERN GROCERS LLC	Retail Trade	12,664.49
SOUTHERN WINE & SPIRITS	Manufacturing	11,400.00
SPARTAN MOTORS INC	Manufacturing	506.76
SPARTON CORP	Manufacturing	336.14
SPECTRUM PHARMACEUTICALS INC	Manufacturing	186.83
SPIRIT AEROSYSTEMS HOLDINGS	Manufacturing	6,799.20
SPORTSMANS WAREHOUSE HLDGS	Retail Trade	660.00
SPX FLOW INC -SPN	Manufacturing	2,769.60
STAGE STORES INC	Retail Trade	1,638.57
STANADYNE CORP	Manufacturing	267.83
STANDEX INTERNATIONAL CORP	Manufacturing	772.14
STAR GAS PARTNERS -LP	Retail Trade	1,961.72
STARRETT (L.S.) CO	Manufacturing	247.13
STEEL DYNAMICS INC	Manufacturing	8,755.95
STERIS CORP	Manufacturing	1,850.26
STONERIDGE INC	Manufacturing	660.58
STRATASYS LTD	Manufacturing	750.13
STRATTEC SECURITY CORP	Manufacturing	411.48





STURM RUGER & CO INC	Manufacturing	544.94
SUCAMPO PHARMACEUTICALS INC	Manufacturing	115.45
SUMMER INFANT INC	Manufacturing	205.36
SUN HYDRAULICS CORP	Manufacturing	227.67
SUNCOKE ENERGY INC	Manufacturing	1,463.20
SUNCOKE ENERGY PARTNERS LP	Manufacturing	648.40
SUNEDISON SEMICONDUCTOR LTD	Manufacturing	840.10
SUNRUN INC	Manufacturing	198.56
SUPERNUS PHARMACEUTICALS INC	Manufacturing	122.05
SUPREME INDUSTRIES INC	Manufacturing	236.31
SYNALLOY CORP	Manufacturing	199.51
SYNGENTA AG	Manufacturing	15,134.00
SYNUTRA INTERNATIONAL INC	Manufacturing	413.94
SYPRIS SOLUTIONS INC	Manufacturing	354.78
SYSTEMAX INC	Retail Trade	3,442.80
TAIWAN SEMICONDUCTOR MFG CO	Manufacturing	24,139.45
TANDY BRANDS ACCESSORIES INC	Manufacturing	114.01
TATA MOTORS LTD	Manufacturing	42,132.33
TECUMSEH PRODUCTS CO	Manufacturing	724.40
TELEFLEX INC	Manufacturing	1,839.83
TEMPUR SEALY INTL INC	Manufacturing	2,989.80
TENARIS SA	Manufacturing	10,337.96
TESCO CORP	Manufacturing	542.99
TESSERA TECHNOLOGIES INC	Manufacturing	278.81
TEVA PHARMACEUTICALS	Manufacturing	20,272.00
TEXAS ROADHOUSE INC	Retail Trade	1,582.15
THE REAGOR DYKES AUTO GROUP	Retail Trade	470.40
THERMON GROUP HOLDINGS INC	Manufacturing	308.58
THOMSON-REUTERS CORP	Manufacturing	12,607.00
TILE SHOP HOLDINGS INC	Retail Trade	257.19
TILLY'S INC	Retail Trade	518.29
TIME INC	Manufacturing	3,281.00
TIMKENSTEEL CORP	Manufacturing	1,674.20
TITAN INTERNATIONAL INC	Manufacturing	1,895.53
TITAN MACHINERY INC	Retail Trade	1,900.25
TMS INTERNATIONAL	Manufacturing	2,400.00
TOPS MARKETS	Retail Trade	2,260.00
TORNIER NV	Manufacturing	344.95
TOSHIBA CORP	Manufacturing	63,143.75
TOWER INTERNATIONAL INC	Manufacturing	2,067.77
TRECORA RESOURCES	Manufacturing	289.64
TRIBUNE PUBLISHING CO	Manufacturing	1,707.98
TRICOLOR AUTO	Retail Trade	131.70





<b>TRIMBLE NAVIGATION LTD</b>	Manufacturing	2,395.55
<b>TRIUMPH GROUP INC</b>	Manufacturing	3,888.72
<b>TRONOX LTD</b>	Manufacturing	1,737.00
<b>TUESDAY MORNING CORP</b>	Retail Trade	906.37
<b>TURTLE BEACH CORP</b>	Manufacturing	186.18
<b>TWIN DISC INC</b>	Manufacturing	265.79
<b>TYCO INTERNATIONAL PLC</b>	Manufacturing	10,340.00
<b>U S CONCRETE INC</b>	Manufacturing	703.71
<b>UBIQUITI NETWORKS INC</b>	Manufacturing	595.95
<b>UFP TECHNOLOGIES INC</b>	Manufacturing	139.31
<b>ULTRA CLEAN HOLDINGS INC</b>	Manufacturing	516.76
<b>UNIFIRST CORP</b>	Manufacturing	1,394.90
<b>UNION CARBIDE CORP</b>	Manufacturing	6,917.00
<b>UNIQUE FABRICATING INC</b>	Manufacturing	126.48
<b>UNITED REFINING CO</b>	Manufacturing	3,439.22
<b>UNITED STATES STEEL CORP</b>	Manufacturing	17,507.00
<b>UNITED THERAPEUTICS CORP</b>	Manufacturing	1,288.52
<b>UNIVERSAL DISPLAY CORP</b>	Manufacturing	191.03
<b>UNVL STAINLESS &amp; ALLOY PRODS</b>	Manufacturing	205.56
<b>UPM-KYMMENE CORP</b>	Manufacturing	12,051.39
<b>US FOODS</b>	Manufacturing	22,200.00
<b>VALEO SA</b>	Manufacturing	15,398.52
<b>VALHI INC</b>	Manufacturing	1,862.60
<b>VALMONT INDUSTRIES INC</b>	Manufacturing	3,123.14
<b>VASCO DATA SEC INTL INC</b>	Manufacturing	201.54
<b>VEDANTA LTD</b>	Manufacturing	11,829.48
<b>VEECO INSTRUMENTS INC</b>	Manufacturing	392.87
<b>VERIFONE SYSTEMS INC</b>	Manufacturing	1,868.87
<b>VERTEX PHARMACEUTICALS INC</b>	Manufacturing	580.42
<b>VILLAGE SUPER MARKET</b>	Retail Trade	1,518.64
<b>VINCE HOLDING CORP</b>	Manufacturing	340.40
<b>VIOLIN MEMORY INC</b>	Manufacturing	107.66
<b>VISANT CORP</b>	Manufacturing	831.77
<b>VISHAY PRECISION GROUP INC</b>	Manufacturing	250.82
<b>VISTEON CORP</b>	Manufacturing	7,509.00
<b>VIVUS INC</b>	Manufacturing	114.18
<b>VIZIO INC -REDH</b>	Manufacturing	3,142.44
<b>VOCERA COMMUNICATIONS INC</b>	Manufacturing	102.50
<b>VOLVO AB</b>	Manufacturing	36,161.80
<b>VOXX INTERNATIONAL CORP</b>	Manufacturing	757.50
<b>W.S. DARLEY &amp; CO</b>	Manufacturing	169.10
<b>WALGREENS BOOTS ALLIANCE INC</b>	Retail Trade	76,392.00
<b>WARNER MUSIC GROUP CORP</b>	Manufacturing	3,027.00



<b>WATERS CORP</b>	Manufacturing	1,989.34
<b>WAYFAIR INC</b>	Retail Trade	1,318.95
<b>WAYNE FARMS INC -REDH</b>	Manufacturing	2,079.30
<b>WEBCO INDUSTRIES INC</b>	Manufacturing	409.48
<b>WEGMANS FOOD MARKETS</b>	Retail Trade	6,850.00
<b>WEIS MARKETS INC</b>	Retail Trade	2,776.68
<b>WENDY'S CO</b>	Retail Trade	2,061.06
<b>WESTELL TECH INC</b>	Manufacturing	104.16
<b>WESTLAKE CHEMICAL PRTRNS LP</b>	Manufacturing	1,749.70
<b>WHIRLPOOL CORP</b>	Manufacturing	19,872.00
<b>WHITEWAVE FOODS CO</b>	Manufacturing	3,436.61
<b>WILBUR-ELLIS</b>	Manufacturing	3,112.00
<b>WILEY (JOHN) &amp; SONS</b>	Manufacturing	1,822.44
<b>WILLIAM LYON HOMES</b>	Manufacturing	896.68
<b>WINNEBAGO INDUSTRIES</b>	Manufacturing	945.16
<b>WOLVERINE WORLD WIDE</b>	Manufacturing	2,761.10
<b>WOODWARD INC</b>	Manufacturing	2,001.24
<b>WORLD WIDE TECHNOLOGY</b>	Manufacturing	6,002.00
<b>WORTHINGTON INDUSTRIES</b>	Manufacturing	3,384.23
<b>XYLEM INC</b>	Manufacturing	3,916.00
<b>YACIMIENTOS PETE FISCALES SA</b>	Manufacturing	16,621.41
<b>YOUNGEVITY INTERNATIONAL INC</b>	Manufacturing	134.04
<b>YOUNG'S MARKET</b>	Manufacturing	3,000.00
<b>YUM BRANDS INC</b>	Retail Trade	13,279.00
<b>ZAGG INC</b>	Manufacturing	261.59
<b>ZELTIQ AESTHETICS INC</b>	Manufacturing	174.48
<b>ZHONE TECHNOLOGIES INC</b>	Manufacturing	120.58
<b>ZOE'S KITCHEN INC</b>	Retail Trade	171.73
<b>ZOETIS INC</b>	Manufacturing	4,785.00
<b>ZULILY INC</b>	Retail Trade	1,200.08