



The Good,
The Bad &
The Tricky:
CA-TISCA
Disclosures
2016





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I. DISCLOSURE COMPLIANCE INDICATORS

Indicator	1. 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.”
Operationalization	<p>A company was awarded a <u>disclosure point</u> when:</p> <ol style="list-style-type: none"> there was a conspicuous link on the company’s homepage (e.g. “Transparency in supply chains disclosure”) directly linked with the disclosure statement; 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 was easily found in the introduction. <p>No <u>disclosure point</u> was awarded when:</p> <ol style="list-style-type: none"> a visitor cannot find a link connected to the disclosure directly on the company’s homepage, e.g. because it was not easily found in the dropdown menu, or the viewer must unhide some content on the homepage; although there was a link, the link’s language was ambiguous such that it was not obvious that the link would direct the viewer to the disclosure; although there was a link, it did not work. <p>The conspicuous link requirement however does not have to reference the Transparency in Supply Chains Act specifically. With the U.K. Modern Slavery Act, which also features a link requirement, companies subject to both laws need to comply accordingly. Some have e.g. chosen to include one link to a page with both statements (or a combined statement) – and the link has been something along the lines of “Statements on Modern Slavery.”</p>
Company Name	The Clorox Company
Point	Yes
Explanation	Conspicuous link on company’s homepage reads “CA Transparency in Supply Chains Act” and leads to CA-TISCA Statement.
Disclosure Link	https://www.thecloroxcompany.com/wp-content/uploads/Clorox_CA_Supply_Chains_Act_Disclosure.pdf
Company Name	Lucky Brand Dungarees
Point	Yes (tricky)



Explanation	Link on company's homepage under "social responsibility." "Social responsibility" link leads directly to CA-TISCA statement without further navigation required.
Disclosure Link	http://www.luckybrand.com/social-responsibility/social-responsibility.html

Indicator	2.A. Disclosure of supply chain risk 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."
Operationalization	According to the <i>Resource Guide</i> published by the former Attorney General Kamala D. Harris, California Department of Justice, "Verifying a product supply chain can include any efforts to identify, assess, and manage the risks of human trafficking in the production of the company's products." A company was thus awarded a <u>disclosure point</u> when it disclosed whether or not it undertook efforts to identify, assess, and manage the risks associated with human trafficking and slavery in its product supply chains.
Company Name	Inditex
Point	Yes
Explanation	Company describes its verification practices in detail, breaking them down into a clearly displayed table.
Disclosure Link	http://www.inditex.com/sustainability/suppliers/transparency-in-supply-chains
Company Name	Douglas Labs
Point	Yes (no affirmative practice)
Explanation	Company clearly states that it does not perform supply chain risk verification.
Disclosure Link	http://www.douglaslabs.com/california-transparency-act/
Company Name	C&H Sugar
Point	No
Explanation	Company's short statement does not mention risk verification.
Disclosure Link	https://www.chsugar.com/california-transparency-in-supply-chains-act-of-2010-declaration
Company Name	Cascade Microtech
Point	Yes (tricky)
Explanation	Company states that it "is in the process of studying existing supply chain operations and is considering developing a company policy that would address issues related to (a) verification of product supply chains to evaluate the potential for products to be manufactures using human trafficking and slavery..." Thus, it earned a disclosure point but not an affirmative practice point



	because it states it is considering engaging in AHT / AS verification, but it not that it had begun engaging in AHT / AS verification.
Disclosure Link	https://www.cascademicrotech.com/company/ca-supply-chain-act
Company Name	Polartec
Point	No (tricky)
Explanation	Though company’s statement has a section for “verification,” the section states, “Polartec reserves the right to access a suppliers’ factories...” and thus it does not state whether or not, or to what extent, the company had conducted verification. As with audits, with verification we drew the line at “reserves the right.”
Disclosure Link	http://polartec.com/sb-657

Indicator	2.B. Disclosure of risk verification performance by 3rd party?
CA-TISCA Language	“The disclosure shall specify if the verification was not conducted by a third party.”
Operationalization	A company was awarded a <u>disclosure point</u> when it disclosed whether or not such verification was conducted by a 3 rd party. A point was also assigned when the company stated it had <i>itself</i> conducted the verification (precluding 3 rd party involvement), such as language along the lines of: “Our company performed 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 company simply and generally had stated that it “was currently developing verification procedures” or similar.
Company Name	American Eagle Outfitters
Point	Yes
Explanation	In a section of its report titled “External Verification,” Company states that it is a participating company in the Fair Labor Association (FLA), describing the FLA’s relevant risk verification functions, and that the Company relies on the International Labor Organization’s (ILO’s) Better Work program factory assessments in lieu of conducting its own assessments where the Better Work program operates.
Disclosure Link	http://pics.ae.com/is/content/aeo/Help/California%20Transparency%20in%20Supply%20Chain%20Notice.pdf
Company Name	Douglas Labs
Point	Yes (no affirmative practice)
Explanation	Company’s statement reads, “We employ no third-party verification or risk analysis of our supply chain.” Thus, it earns a disclosure point.



Disclosure Link	http://www.douglaslabs.com/california-transparency-act/
Company Name	Cascade Microtech
Point	No
Explanation	Because Company states that it “is in the process of studying existing supply chain operations and is considering developing a company policy that would address issues related to (a) verification of product supply chains to evaluate the potential for products to be manufactures using human trafficking and slavery...” and does not mention a third party, it did not earn a disclosure point.
Disclosure Link	https://www.cascademicrotech.com/company/ca-supply-chain-act

Indicator	3.A. Disclosure of supplier / supply chain 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.”
Operationalization	The key word is <i>audits</i> . To receive a <u>disclosure point</u> , 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. 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.
Company Name	3M
Point	Yes
Explanation	In a section of its report titled “Auditing,” Company describes its auditing practice, including both supplier self-assessments and on-site audits.
Disclosure Link	http://multimedia.3m.com/mws/media/7386170/supply-chain-sustainability-report.pdf
Company Name	Douglas Labs
Point	Yes (no affirmative practice)
Explanation	Company’s statement reads “We...conduct no independent, unannounced audits.”
Disclosure Link	http://www.douglaslabs.com/california-transparency-act/
Company Name	Polartec



Point	No (tricky)
Explanation	Company states that it “reserves the right to access a supplier’s site, and may also audit the supplier’s records...” It did not earn a disclosure point because it did not state whether or not, or to what extent, it conducts audits of suppliers.
Disclosure Link	http://polartec.com/sb-657
Company Name	Brandt
Point	Yes (tricky)
Explanation	Company states that it conducts announced, regularly scheduled audits and further reserves the right to conduct unannounced audits. This is an acceptable use of the phrase “reserves the right.”
Disclosure Link	http://thebrandtfoundation.org/Legal

Indicator	3.B. Disclosure of audit type?
CA-TISCA Language	“The disclosure shall specify if the verification was not an independent, unannounced audit.”
Operationalization	A company was awarded a <u>disclosure point</u> when it described whether or not audits were independent <i>and</i> unannounced. Disclosures would only get a point if both audit practices (unannounced AND independent) were addressed. Language along the lines of “We are currently developing auditing procedures” did not receive a disclosure point, as it does not make clear whether or not past audits had taken place and whether they were independent and unannounced.
Company Name	Douglas Labs
Point	Yes (no affirmative practice)
Explanation	Company’s statement reads “We...conduct no independent, unannounced audits.” Because it went further in its disclosure than most companies that did not conduct audits by including the phrase “independent, unannounced” as the law requires, it earned one disclosure point more than many other companies.
Disclosure Link	http://www.douglaslabs.com/california-transparency-act/
Company Name	ON Semiconductor
Point	Yes
Explanation	Company describes its auditing practices and states, “These audits are announced and conducted by a third party firm...”
Disclosure Link	https://www.onsemi.com/site/pdf/Slavery-Human-Trafficking-Policy.pdf
Company Name	3M
Point	No (Tricky)
Explanation	Though Company gives a comprehensive description of its auditing practices and discloses that its audits are not independent (but



	conducted by internal staff), it does not state whether its audits are announced or unannounced (or scheduled / unscheduled).
Disclosure Link	http://multimedia.3m.com/mws/media/7386170/supply-chain-sustainability-report.pdf

Indicator	4. 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.”
Operationalization	<p>As the term “certify” is not defined by CA-TISCA, we interpreted the legislative intent to signify an affirmation 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 specify whether or not their certification involved an independent, 3rd party verification premised on established standards of production – conventionally associated with the term “certification.”</p> <p>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.</p> <p>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.</p>
Company Name	Herrick Steel
Point	Yes (no affirmative practice)
Explanation	Company states that it, “does not require direct suppliers to certify that materials incorporated into the product comply with



	the laws regarding human trafficking and slavery of the country or countries in which they are doing business.” Thus, it earned a disclosure point but not an affirmative practice point.
Disclosure Link	http://www.herricksteel.com/california-transparency-supply-chains-act
Company Name	Lucky Brand Dungarees
Point	No
Explanation	Under the heading, “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” company does not mention requesting a certification of compliance with AHT / AS laws. Rather, it states, “direct suppliers are prohibited from utilizing unauthorized subcontractors for the production of [company] products or components without prior written approval. [Company] approval may require an audit of the subcontractor prior to work beginning to ensure compliance with our Code of Conduct.”
Disclosure Link	http://www.luckybrand.com/social-responsibility/social-responsibility.html
Company Name	Zumiez
Point	No (tricky)
Explanation	Company states that it “holds its direct suppliers contractually responsible for adhering to [its] policies” but does not mention AHT / AS laws and it does not mention requesting a certification of compliance.
Disclosure Link	http://www.zumiez.com/help/community

Indicator	5. 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.”
Operationalization	Company stated whether or not it maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
Company Name	Herrick Steel
Point	Yes (no affirmative practice)
Explanation	Company states that it “does not maintain internal accountability standards and procedures for employees or contractors failing to



	meet company standards regarding human trafficking and slavery.”
Disclosure Link	http://www.herricksteel.com/california-transparency-supply-chains-act
Company Name (2)	Inditex
Point	Yes
Explanation	Company describes its internal accountability standards and procedures in detail.
Disclosure Link	http://www.inditex.com/sustainability/suppliers/transparency-in-supply-chains
Company Name	Urban Outfitters
Point	No (Tricky)
Explanation	Company focuses on its accountability standards and procedures for its suppliers, not its internal accountability standards and procedures for its employees or contractors. Thus, because the law requires focus on such standards for employees and contractors, Company was not awarded a point.
Disclosure Link	http://www.urbn.com/documents/california-transparency-in-supply-chains-act

Indicator	6. 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.”
Operationalization	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.
Company Name	Burberry
Point	Yes
Explanation	Company describes its AHT / AS training program in detail.
Disclosure Link	Burberry AHT / AS Disclosure Link
Company Name	Green Bay Packaging
Point	No (tricky)



Explanation	Company describes a training program, but doesn't mention AHT / AS training.
Disclosure Link	http://gbp.com/wp-content/uploads/2015/07/CaliforniaTransparencyAct.pdf

II. AFFIRMATIVE PRACTICE INDICATORS

Indicator	2.A. Company conducted supply chain risk verification and mitigation?
Operationalization	<p>A company was awarded an <u>affirmative practice point</u> if it specified that it undertook:</p> <ol style="list-style-type: none"> supply chain mapping, <i>or</i> risk assessment, <i>or</i> risk mitigation <p>Supply chain mapping is essentially a prerequisite for risk assessment and mitigation.</p> <p>The other question is whether a point would be granted if a company reported undertaking these analyses on all suppliers or just “<i>at-risk</i>” or “<i>high-risk</i>” suppliers. If a company discloses that it is undertaking some form of risk verification or mitigation on just at-risk or high-risk suppliers, an affirmative practice point is awarded. The evaluation framework thus acknowledges company efforts to conduct meaningful supply chain analyses to identify and prioritize relevant risk in the supply chain.</p>
Company Name	Cisco Systems
Point	Yes
Explanation	In a section titled “verification,” Company describes that it conducted verification through the EICC Maplecroft Risk Assessment Tool, Supplier Self-Assessment Questionnaire, Validated Audit Process, and more specifically “to evaluate and address risks of human trafficking and slavery.”
Disclosure Link	http://www.cisco.com/c/en/us/about/corporate-social-responsibility/statement-slavery-human-trafficking.html
Company Name	Polartec
Point	No (tricky)
Explanation	Though Company’s statement has a section for “verification,” the section states, “Polartec <i>reserves the right</i> to access a suppliers’ factories...” and thus it does not state whether or not, or to what extent, the company had conducted verification, so it was



	awarded neither a disclosure point nor an affirmative practice point.
Disclosure Link	http://polartec.com/sb-657

Indicator	2.B. Risk verification performed by 3rd party?
Operationalization	<p>It may be inferred by this disclosure requirement that the lawmaker's preference is that such verification be in fact carried out by or involving a 3rd party.</p> <p>A company was awarded an <u>affirmative practice point</u> if it had some aspect of Anti-Human Trafficking / Anti-Slavery (AHT/AS) risk identification, assessment and/or mitigation performed by 3rd party.</p>
Company Name	American Eagle Outfitters
Point	Yes
Explanation	In a section of its report titled "External Verification," Company states that it is a participating company in the Fair Labor Association (FLA), describing the FLA's relevant risk verification functions, and that the company relies on the International Labor Organization's (ILO's) Better Work program factory assessments in lieu of conducting its own assessments where the Better Work program operates.
Disclosure Link	AEO CA-TISCA Disclosure

Indicator	3.A. Company conducted / commissioned supplier / supply chain audits?
Operationalization	<p>A company was awarded an <u>affirmative practice point</u> when it stated that it conducted or commissioned audits of suppliers (Tier 1 or deeper) to evaluate their compliance with company standards, the audit standards however needing to include stipulations concerning human trafficking and/or modern-day slavery and/or forced labor in supply chains.</p> <p>We note that the law's language does not limit audits to direct suppliers, and could therefore be interpreted to mean the entire supply chain. The point was therefore awarded to a company that discussed having either audit scope.</p>
Company Name	Inditex
Point	Yes
Explanation	Company describes its audit process in detail, including "inspections of the installations, document reviews (management systems, payroll, hours worked, production, worker documentation and permits among others), interviews with



	factory managers, employees...” and represents its audit process visually in a chart.
Disclosure Link	http://www.inditex.com/sustainability/suppliers/transparency-in-supply-chains
Company Name	Herrick Steel
Point	No
Explanation	Company states it “does not conduct audits of suppliers to evaluate supplier compliance with standards for human trafficking and slavery in supply chains.”
Disclosure Link	http://www.herricksteel.com/california-transparency-supply-chains-act

Indicator	3.B. Audits performed by independent 3rd party?
Operationalization	It may be inferred by this disclosure requirement that the law’s sponsors hold that audits conducted by an independent 3 rd party are more robust and carry with them inherent fraud deterrence or enhanced supplier accountability. The evidence indeed points in that direction: it is clear that auditor independence is imperative, in particular independence from the auditee. We marked “yes” here when the company stated it undertook / commissioned independent 3 rd party audits.
Company Name	American Eagle Outfitters
Point	Yes
Explanation	Company describes using a mix of third-party auditors, local independent auditors, and its own inspectors in its factory inspection program and provides a hyperlink to more information.
Disclosure Link	AEO CA-TISCA Disclosure
Company Name	Belkin International
Point	No
Explanation	Company states that it does audits, but that those audits “are not independent and unannounced.”
Disclosure Link	http://www.belkin.com/us/Supply-Chain-Responsibility/

Indicator	4. Company required supplier certification of compliance with pertinent laws?
Operationalization	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.
Company Name	Clearwater Paper
Point	Yes



Explanation	Company states that it “Annually sends a letter to all current vendors and suppliers requesting signed certification that materials incorporated into supplied products are in compliance with state and federal laws regarding slavery and human trafficking of the country or countries in which business is being conducted.” A step further than clause in purchase order terms and conditions requiring a supplier to “certify,” the annual letter requesting signed certification earned an affirmative practice point.
Disclosure Link	http://www.clearwaterpaper.com/docs/downloads/california-transparency-of-supply-chain-act-disclosure.pdf?Status=Master
Company Name	Zumiez
Point	No
Explanation	Company states that it “holds its direct suppliers contractually responsible for adhering to [its] policies” but does not mention AHT / AS laws and nor requesting a certification of compliance.
Disclosure Link	http://www.zumiez.com/help/community

Indicator	5. Company maintains internal accountability standards and procedures?
Operationalization	<p>Standards and procedures are components of an internal accountability system. Language stating that the company had such relevant elements of an accountability system in place allowing the company/contractor to take necessary action would receive an affirmative practice point.</p> <p>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, and 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.</p>
Company Name	Patagonia
Point	Yes
Explanation	Company describes its internal standards and procedures for AHT / AS in detail, including internal audits by the Fair Labor Association (FLA).
Disclosure Link	http://www.patagonia.com/california-transparency-in-supply-chains-act-sb-657.html
Company Name	Inditex



Point	Yes
Explanation	Company describes its internal AHT / AS standards and procedures for employees and contractors in detail, including a whistleblower channel and corrective action plans.
Disclosure Link	http://www.inditex.com/sustainability/suppliers/transparency-in-supply-chains
Company Name	Urban Outfitters
Point	No (Tricky)
Explanation	Company focuses on its accountability standards and procedures for its suppliers, not its internal accountability standards and procedures for its employees or contractors, such as whistleblower programs, hotlines, and internal audits.
Disclosure Link	http://www.urbn.com/documents/california-transparency-in-supply-chains-act

Indicator	6. Company provides in-house training on human trafficking and slavery?
Operationalization	The 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.
Company Name	Patagonia
Point	Yes
Explanation	Company describes its AHT / AS training program in detail, including a two-hour training event conducted by a 3rd party together with its Director of Social and Environmental Responsibility.
Disclosure Link	http://www.patagonia.com/california-transparency-in-supply-chains-act-sb-657.html
Company Name	Urban Outfitters
Point	No (tricky)
Explanation	Company describes a training program “to identify and evaluate risks in the supply chain” but does not mention AHT / AS training.
Disclosure Link	http://www.urbn.com/documents/california-transparency-in-supply-chains-act

III. TRANSPARENCY INDICATORS

Indicator	1. Referenced law in statement?
Operationalization	Company referenced the Act in their statement.



Company Name	Patagonia
Point	Yes
Explanation	The heading of company's statement clearly reads, "California Transparency in Supply Chains Act of 2010 (SB 657)"
Disclosure Link	http://www.patagonia.com/california-transparency-in-supply-chains-act-sb-657.html
Company Name	Amazon
Point	No (Tricky)
Explanation	Company has a comprehensive statement, but it does not reference CA-TISCA.

Indicator	2. Supply chain mapping described?
Operationalization	Note the method(s) employed to carry out supply chain mapping.
Company Name	Svenska Cellulosa (SCA)
Point	Yes
Explanation	Company states, "together with the non-profit organization BSR, [it] has mapped out and identified its human rights risks through a Group-wide human rights impact assessment process." Thus, it carried out supply chain mapping through a third-party service.
Disclosure Link	http://www.sca.com/en/Sustainability/Human-rights/
Company Name	Gap
Point	Yes
Explanation	Company stated that it conducted supply chain mapping through on-the-ground Assessment & Remediation specialists who gained knowledge of the reputations and risks associated with local factories.
Disclosure Link	http://www.gapinc.com/content/gapinc/html/sustainability/ca-transparency-insupplychainsact.html

Indicator	3. Supply chain transparency exhibited?
Operationalization	The company disclosed a list of suppliers/contractors.
Company Name	Gap
Point	Yes
Explanation	Company provided a link to its "approved list of factories."
Disclosure Link	http://www.gapinc.com/content/gapinc/html/sustainability/ca-transparency-insupplychainsact.html
Company Name	Sierra Aluminum
Point	Yes
Explanation	Company provided links to the websites of its two suppliers, Rio Tinto and Alcoa, with its statement.
Disclosure Link	Sierra Aluminum



Indicator	4. Risk assessment described?
Operationalization	Note the method(s) employed to carry out risk assessment.
Company Name	Intel
Point	Yes
Explanation	Company described its risk assessment methods, including a self-assessment questionnaire and a more detailed questionnaire for high-risk suppliers, in detail.
Disclosure Link	http://www.intel.com/content/www/us/en/policy/policy-human-trafficking-and-slavery.html
Company Name	International Paper
Point	Yes
Explanation	Company developed a global risk heat map for its supply chain, assessing country risk based on Transparency International's Corruption Perception Index.
Disclosure Link	http://www.internationalpaper.com/documents/EN/California_Transpare.pdf

Indicator	5. Human trafficking / slavery-related risk(s) in supply chain(s) described?
Operationalization	The company described specific human trafficking/slavery-related risk(s) in their supply chain(s).
Company Name	Archer Daniels Midland
Point	Yes
Explanation	Company discussed industry-specific risks for multiple products including cocoa, palm, and soy.
Disclosure Link	http://www.adm.com/en-US/responsibility/2014CRReport/Documents/CA-TSCAct-ToCustomers-June2015.pdf
Company Name	Gildan
Point	Yes
Explanation	Company described the risk of the use of cotton from Uzbekistan.
Disclosure Link	http://www.genuinegildan.com/en/people/code-conduct/california-transparency-supply-chains-act/

Indicator	6. Risk mitigation described?
Operationalization	Note the method(s) employed to carry out risk mitigation.
Company Name	Archer Daniels Midland
Point	Yes
Explanation	Company described its efforts to mitigate risks in cocoa, palm, and soy industries through a combination of certifications, audits, industry programs, and government partnerships.



Disclosure Link	http://www.adm.com/en-US/responsibility/2014CRReport/Documents/CA-TSCAct-ToCustomers-June2015.pdf
Company Name	Gildan
Point	Yes
Explanation	Company described how it mitigated the risk of the use of cotton from Uzbekistan through a cotton traceability assessment.
Disclosure Link	http://www.genuinegildan.com/en/people/code-conduct/california-transparency-supply-chains-act/
Company Name	Apple
Point	Yes
Explanation	Company described sending an onsite team to provide hands-on guidance to suppliers during periods of peak production before new product launches when suppliers hire significantly more workers so risks of slavery and human trafficking are higher.
Disclosure Link	https://www.apple.com/euro/supplier-responsibility/c/generic/pdf/SB_657_3.24.2016.pdf

Indicator	7. Metrics for supply chain mapping, risk assessment and risk mitigation discussed?
Operationalization	The company used Key Performance Indicators (KPIs) to quantitatively measure performance of supply chain mapping, risk assessment and/or risk mitigation. Possible KPIs could be, e.g.: <ul style="list-style-type: none"> • Tiers in supply chain mapped as % of total tiers • Identification and quantification of risk practices • Cut-off for identification of <i>at-risk</i> or <i>high-risk</i> suppliers • <i>At-risk</i> or <i>high-risk</i> direct suppliers assessed as % of all direct suppliers • Quantification of risk mitigation actions • Quantification of risk mitigation targets
Company Name	Inditex
Point	Yes
Explanation	Company described measuring success by number of assessments conducted per year, conducting 2,367 pre-assessment audits in one year.
Disclosure Link	http://www.inditex.com/sustainability/suppliers/transparency-in-supply-chains
Company Name	Motorola Solutions
Point	Yes
Explanation	Company described measuring success by number of suppliers verified as a % of spend, verifying the suppliers in its top 80% of spend.



Disclosure Link	https://www.motorolasolutions.com/en_us/about/company-overview/corporate-responsibility.html
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Indicator	8. KPI results of the risk verification discussed
Operationalization	The company discussed the findings of its risk verification KPIs.
Company Name	N/A
Point	N/A
Explanation	N/A
Disclosure Link	N/A

Indicator	9. Frequency of supply chain mapping, risk assessment and risk mitigation discussed?
Operationalization	With what periodicity did the company undertake such actions? E.g. quarterly, biannually, annually, biennially, triennially, etc.
Company Name	Apple
Point	Yes
Explanation	Company stated that it conducted verifications “every year.”
Disclosure Link	https://www.apple.com/euro/supplier-responsibility/c/generic/pdf/SB_657_3.24.2016.pdf
Company Name	Searing Industries
Point	No
Explanation	Company stated that it performed “periodic evaluations of its supply chain.” This was not specific to earn a point.
Disclosure Link	http://www.searingindustries.com/wp-content/uploads/2016/04/SEA1602-CAL-Supply-Chain-Act-Disclosure-Letter.pdf

Indicator	10. 3rd party entity/ies that performed risk verification mentioned?
Operationalization	Company specified 3 rd party entity.
Company Name	Intel
Point	Yes
Explanation	Company stated, “We regularly engage with outside experts such as BSR, Verité, The FAIR Hiring Initiative and Elevate...” for risk verification.
Disclosure Link	http://www.intel.com/content/www/us/en/policy/policy-human-trafficking-and-slavery.html
Company Name	Prana
Point	Yes



Explanation	Company references its FLA membership with regard to risk verification.
Disclosure Link	http://www.pрана.com/california-transparency-act

Indicator	11. Supplier / supply chain audit methods discussed?
Operationalization	What were the audit method(s) – including standards – employed to carry out audits?
Company Name	Burton
Point	Yes
Explanation	Company described its audit methods and standards in detail, including its comprehensive rating system.
Disclosure Link	http://akamai-ssl.burton.com/2017/images/sustainability/docs/burton-scp.pdf
Company Name	Amazon
Point	Yes
Explanation	Company stated, “Every site audit includes: Inspection of all areas of the site and any living quarters; Confidential worker interviews conducted without site management present; Review and analysis of site documents to assess workers' age, contracts, compensation, working hours, and workplace conditions; Audit and review of current licenses and any past compliance issues; and Identification of areas for improvement and development of a remediation plan.”
Disclosure Link	Amazon Disclosure

Indicator	12. Audit findings discussed?
Operationalization	Company listed (select) incidents (e.g. supplier code of conduct violations) and their incidence.
Company Name	Reckitt Benckiser
Point	Yes
Explanation	Company discussed its audit findings with the following statement, “The common areas of non-conformity relate to health & safety, working hours and a lack of sustainability management systems, which are common issues shared across the wider manufacturing industry especially within developing markets.”
Disclosure Link	http://rbnainfo.com/productpro/CA-Trans-Antislavery.pdf
Company Name	Gap
Point	Yes (tricky)
Explanation	Company stated, “We publicly report on the findings of assessments at the factories that make our branded apparel on our company website.” While it did not discuss its audit findings in



	detail in its disclosure, it was awarded a point for referencing a discussion of its audit findings elsewhere.
Disclosure Link	http://www.gapinc.com/content/gapinc/html/sustainability/ca-transparency-insupplychainsact.html

Indicator	13. Incident remediation discussed?
Operationalization	Company specified which incidents were (being) followed-up and were (being) remediated.
Company Name	American Eagle Outfitters
Point	Yes
Explanation	Company issued a report on the results of its factory inspections.
Disclosure Link	AEO Disclosure
Company Name	Intel
Point	Yes
Explanation	Company discussed remediation of a number of specific incidents.
Disclosure Link	http://www.intel.com/content/www/us/en/policy/policy-human-trafficking-and-slavery.html

Indicator	14. Violation consequences discussed?
Operationalization	Company specified what processes are in place to conduct such remediation?
Company Name	Aeropostale
Point	Yes
Explanation	Company described a corrective action plan including, “(i) the immediate action that will be taken, (ii) persons responsible for action, (iii) the date of completion and (iv) the root cause of the issue and change in system that will prevent reoccurrence.”
Disclosure Link	http://theaeroway.com/?page_id=54
Company Name	Burberry
Point	Yes
Explanation	Company described that in the event of a violation it would “first take steps to protect factory workers, then work on a supplier remediation plan.”
Disclosure Link	Burberry Disclosure

Indicator	15. Supplier / supply chain audit metrics discussed?
Operationalization	The company used KPIs to quantitatively measure performance of supplier / supply chain audits. E.g.: <ul style="list-style-type: none"> • Tiers in supply chain audited as % of total tiers • % of <i>at-risk</i> or <i>high-risk</i> suppliers audited • <i>At-risk</i> or <i>high-risk</i> direct suppliers audited as % of all direct suppliers



Company Name	Hewlett-Packard
Point	Yes
Explanation	Company described measuring audit success by number of audits conducted and % of audits that were independent, 192 and 46% respectively.
Disclosure Link	http://www8.hp.com/us/en/hp-information/global-citizenship/society/california-transparency-in-supply-chains-act-of-2010.html
Company Name	Xerox
Point	Yes
Explanation	Company described measuring audit success by number of suppliers audited as a percent of spend.
Disclosure Link	https://www.xerox.com/en-us/about/supplier-relations/supply-chain-transparency

Indicator	16. Results of the audit KPIs discussed?
Operationalization	The company discussed the findings of its audit KPIs.
Company Name	N/A
Point	N/A
Explanation	N/A
Disclosure Link	N/A

Indicator	17. Frequency of supplier / supply chain audits discussed?
Operationalization	Were audits conducted quarterly, biannually, annually, biennially, triennially, etc.?
Company Name	Patagonia
Point	Yes
Explanation	Company states that the FLA audits a percentage of its supply chain annually.
Disclosure Link	http://www.patagonia.com/california-transparency-in-supply-chains-act-sb-657.html
Company Name	DelMonte Foods
Point	No
Explanation	Company stated that it conducted “periodic” audits. This was not specific enough to earn a point.
Disclosure Link	http://www.delmontefoods.com/corporate-responsibility/supplier-relations/ca-transparency-supply-chains-act

Indicator	18. AHT / AS policy or code of conduct public and referenced?
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Operationalization	The company referenced its policy or supplier code of conduct that addresses the company's standards and expectations regarding anti-human trafficking / anti-slavery, and this policy is publicly accessible. The specific Code of Conduct designation varies between companies. Some companies called it "supplier code of conduct," "code of business" or "code of ethics."
Company Name	Hewlett-Packard
Point	Yes
Explanation	Company references its AHT / AS code of conduct and, crucially provides a link to the code of conduct on its website making it public.
Disclosure Link	http://www8.hp.com/us/en/hp-information/global-citizenship/society/california-transparency-in-supply-chains-act-of-2010.html

Indicator	19. Nature of internal accountability standards discussed?
Operationalization	In the way of standards, a company could e.g. reference an employee/ supplier code of conduct.
Company Name	General Motors
Point	Yes
Explanation	Company describes its internal code of conduct to which employees are required to certify compliance yearly.
Disclosure Link	http://www.gm.com/supply-chain-responsibility.html

Indicator	20. Nature of internal accountability procedures discussed?
Operationalization	To receive this transparency point, relevant information would be a discussion of the procedures, e.g. whether or not there would be consequences for non-compliance, and/or the existence of an employee grievance or dispute resolution mechanism, and/or a hot-line for employees to report complaints, etc.
Company Name	General Motors
Point	Yes
Explanation	Company describes two hotlines in multiple languages with whistleblower protections and investigation of allegations.
Disclosure Link	http://www.gm.com/supply-chain-responsibility.html
Company Name	Burberry
Point	Yes
Explanation	Company describes a third party hotline operated by local NGOs and "providing over 19000 workers across 33 factories with improved access to remedy."
Disclosure Link	Burberry Disclosure
Company Name	Patagonia



Point	Yes
Explanation	Company describes its own headquarters being formally audited every three years by the FLA under the FLA’s Principles of Fair Labor and Responsible Sourcing.
Disclosure Link	http://www.patagonia.com/california-transparency-in-supply-chains-act-sb-657.html

Indicator	21. AHT / AS training topics listed?
Operationalization	To receive this transparency point, the company would note the training topics.
Company Name	Berry Plastics
Point	Yes
Explanation	Company describes training specifically on the ISO 26000 Social Responsibility Standards, the UN Palermo Protocol on Human Trafficking and the current U.S. State Department Trafficking in Persons Report.
Disclosure Link	http://www.berryplastics.com/docs/default-source/legal-documents/ctsca---global-acquisition-and-accountability-policy-june-2013.pdf?sfvrsn=4
Company Name	Lucky Brand Dungarees
Point	Yes
Explanation	Company describes training on the definitions of slavery, human trafficking, debt bondage, forced labor, and child labor as well as methods of recognizing and responding to the signs of human trafficking in the supply chain.
Disclosure Link	http://www.luckybrand.com/social-responsibility/social-responsibility.html