Joerns Healthcare California Transparency in Supply Chains Act Disclosure Statement

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires qualifying retailers and manufacturers doing business in the state of California to disclose efforts to eradicate human trafficking and slavery from its supply chain, including but not limited to any requirements that our suppliers certify that they comply with all anti-slavery and human trafficking laws in the country or countries in which they do business.

It is and always has been Joerns Healthcare’s policy to observe and comply with all laws applicable to us and our operations wherever our business is located including, but not limited to, anti-slavery and human trafficking laws. Any violations or suspected violations are encouraged to be reported promptly. We have an “open door” policy that allows employees to report concerns to higher levels of management.

In further compliance with the Act, Joerns Healthcare discloses:

Verification

(1) We engage in verification of product supply chains to evaluate or address risks of human trafficking and slavery by, beginning in September 2016, requiring our direct suppliers to certify that materials incorporated into their products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Supplier Audits

(2) Beginning in September 2016, we will require the certifications set forth in item three (3), below. We will not, however, conduct independent audits of our suppliers’ responses or of their business practices.

Certification

(3) Beginning in September 2016, we will require our direct suppliers to certify that materials incorporated into their products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Internal Accountability

(4) We updated our company Code of Conduct to include a California Transparency in Supply Chains Act section, which sets forth written internal accountability standards and procedures for employees and contractors who fail to meet anti-slavery and human trafficking standards.

Training

(5) Beginning in December 2016, we will provide our employees and management who have direct responsibility for supply chain management with formal training specifically on anti-slavery and human trafficking laws.