

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

CLARCOR Inc. (including its affiliated companies, "CLARCOR") supports the human rights goals of the California Transparency in Supply Chains Act of 2010, which requires disclosures about the global issues of human trafficking and slavery.

Ethical behavior and compliance with law are non-negotiable elements of CLARCOR's culture and are expected of every employee. CLARCOR strives to select and engage suppliers with the same values.

CLARCOR's actions in this area include the following:

- 1. Product Supply Chains / Suppliers.** The CLARCOR Standard Supplier Terms and Conditions (the "Supplier Terms") and the CLARCOR Supplier Code of Conduct (the "Supplier Code") contain various standards for CLARCOR suppliers. In particular, the Supplier Terms require the supplier to warrant its compliance with all laws, including those that prohibit human rights violations. The Supplier Code addresses specific areas such as safe working conditions, child labor, fair wages and otherwise humane and respectful business practices.
- 2. Supplier Verifications, Audits and Certifications.** CLARCOR does not specifically investigate each prospective supplier to independently verify the supplier's compliance with laws prohibiting human trafficking and slavery. CLARCOR also does not require its suppliers to provide specific, ongoing and stand-alone certifications about compliance with laws prohibiting human trafficking and slavery. In some cases, however, CLARCOR does reserve the right to verify that one or more existing suppliers are in compliance with the Supplier Terms and the Supplier Code by performing an audit (which may be done by a third party). CLARCOR may demand corrective measures or terminate its relationship with the supplier if the audit reveals non-compliance by the supplier (including any non-compliance with laws prohibiting human trafficking and slavery).
- 3. Human Rights in our Business Practices.** Since the company was founded, CLARCOR's leadership has emphasized the importance of integrity, fair dealing and respect for the individual. CLARCOR believes that these principles are at the very core of our business and are reflected by each of our employees.
- 4. Corporate Conduct Guidelines.** The CLARCOR Corporate Conduct Guidelines (the "CLARCOR Guidelines") outline expectations and standards for CLARCOR employees. The CLARCOR Guidelines requires CLARCOR employees to follow all applicable laws. While the CLARCOR Guidelines do not specifically address laws prohibiting human trafficking and slavery, compliance with these laws is certainly included within the general requirement to follow all applicable laws and any non-compliance would not be tolerated.
- 5. Employee Training.** Compliance training is regularly provided to CLARCOR employees on a variety of topics. However, to date there has been no focused training effort to employees in CLARCOR purchasing departments that is specifically directed toward laws prohibiting human trafficking and slavery.