

The California Transparency in Supply Chains Act of 2010
PCF's Disclosures

PCF Support of Human Rights in Our Business Practices

PCF is a distributor of newspapers and periodicals, as well as a logistics solutions company. We are committed to social responsibility, both as an employer and in how we do business. Our goal is to ensure that human rights are upheld for all workers involved in our supply chain, and that individuals experience safe, fair and non-discriminatory working conditions.

This document describes PCF's actions to support human rights, including our actions in response to disclosure requirements of the California Transparency in Supply Chains Act of 2010 (the "Act"). The Act is designed to increase the amount of information made available by manufacturers and retailers regarding their efforts (if any) to address the issues of slavery and human trafficking, thereby allowing consumers to make better, more informed choices regarding the products they buy and the companies they choose to support. PCF is committed to complying with the law and conducting all business activities in accordance with the highest ethical standards.

Overview of PCF's actions to support human rights

PCF recognizes fair labor practices as being an inherent part of human rights. The focus on human rights in business practice is centered on our use of suppliers, though limited, and in the distribution of publications. While our merchant vendors have fair labor compliance programs in place, PCF stipulates that all vendors apply PCF standards in their distribution of supplies.

PCF's key actions in support of human rights include:

1. PCF specifically prohibits human trafficking and slavery in its product supply chains. Although PCF does not engage in third-party verification to evaluate and address risks, all complaints filed through PCF's Ethics hotline (described below) are promptly and thoroughly investigated and handled as appropriate.
2. PCF requires its suppliers to adhere to PCF's standards with respect to all aspects of business dealings. PCF provides notice to PCF's California supply chain vendors of PCF's position on human rights and expectations of their compliance to follow PCF's protocols. PCF also provides a notice on its website which identifies PCF's compliance and professional standards related to human trafficking and slavery. At this time, audits are not conducted by an independent party.
3. PCF requires all direct suppliers that provide materials incorporated into the product to act in accordance with all applicable international, federal, state, and local laws and regulations, when applicable.
4. Because PCF believes in fair labor practices as being an inherent part of human rights, PCF maintains internal accountability standards for its employees and/or contractors. PCF provides Ethics hotline access for PCF employees and business invitees to report potential issues. Each report is investigated by PCF. PCF also requires its employees to adhere to PCF's ethics standards.
5. Finally, PCF provides employees and management who have direct responsibility for supply chain management with training on human trafficking and slavery. PCF also provides continual

awareness of human trafficking issues and compliance via posting a PowerPoint presentation on PCF's intranet.

PCF maintains a professional code of conduct that includes maintaining a professional and humane work environment for its employees, contractors and visitors. PCF will not use physical or psychological disciplinary tactics. Additionally, PCF will not subject employees to threats of violence, sexual harassment or psychological abuse. PCF will not use forced labor, including imprisonment, indentured, bonded or any other form of compulsory labor, nor will it use persons younger than 18 years of age in any of its facilities.

PCF will meet all legal requirements for wages and benefits where it conducts its business and will meet industry standards. Furthermore, PCF will provide workers with a safe and healthy work environment in compliance with all applicable laws and regulations.

In conclusion, PCF is committed to upholding human rights as it conducts every aspect of its business. PCF will update this notice to reflect improvements and progress in preventing and addressing potential human rights violations in our supply chain, particularly in the areas of slavery and human trafficking. We encourage our employees, customers and the public at large to review this document.

PCF Ethics Hotline 1 -800-779-5560