

In September 2010, California passed the California Transparency in Supply Chains Act of 2010 requiring manufacturers to publicly disclose their efforts to eradicate human trafficking and slavery from their direct supply chains.

Crayola Supplier Code of Conduct

Caring about others is deeply embedded in Crayola's culture. That's evident in our products, of course, but it's also clear in the countless ways our company and employees bring caring commitment to the community. Good corporate citizenship is a value established by our founder and embraced by the company leaders who have followed. Crayola's commitment to corporate citizenship extends to caring for the world around us by acting as a good steward of the environment, and by establishing a Supplier Code of Conduct setting business practice expectations of our suppliers domestically and around the world.

Crayola has communicated these expectations of our direct suppliers to ensure that materials incorporated into our products comply with all applicable laws regarding slavery and human trafficking. Direct suppliers are trained to identify supply chain risks and expected to mitigate these risks within their material and component supply chain. Additionally, Crayola employees who have responsibility for supply chain management are trained to identify and mitigate risks associated with all forms of forced labor.

Monitoring and Enforcement

Crayola uses both third party monitoring firms and internal resources to monitor adherence to its Supplier Code of Conduct in the manufacture of our products. These audits may be completely unannounced or semi-unannounced, meaning that the supplier is given a window of time that the audit will occur (usually two weeks).

Confidential interviews between the auditor and the workers are a key component of the auditing process as is the review of compensation records, working hours and hiring practices. If any evidence is found suggesting that slavery or human trafficking may be present, Crayola will conduct a full investigation. This may include further auditing of sub-tier suppliers and labor recruitment agencies, and/or engaging with non-governmental organizations with specialized expertise in identifying these types of abuses.

If abuses are identified, Crayola will engage in a remediation plan that may include collaboration with other customers doing business with the supplier, further engagement with NGO's, or working with appropriate governmental bodies. While Crayola may choose to end the business relationship with these suppliers, the remediation will continue until the issue is resolved.