

## **Our Commitment to Eradicating Trafficking and Slavery from our Supply Chain:**

CSS Industries, Inc. is committed to conducting business in a socially responsible manner. This includes the recognition that we have a responsibility towards ensuring that slavery and trafficking do not occur in our supply chain. We seek to operate in compliance with all applicable laws wherever we do business, and to respect and support international principles aimed at preventing and eradicating trafficking and slavery, as described in the 2000 United Nations “Palermo Protocol” and the 1926 Slavery Convention.

To further these goals, we have incorporated these standards into our vendor qualification process and require that our direct suppliers certify their compliance with these requirements, including the requirement that all materials incorporated into our products comply with the laws regarding trafficking and slavery in the country or countries in which they are doing business. Our supply chain monitoring policies and procedures include regular, unannounced compliance audits by third-party monitors and by our dedicated sourcing team, which has many years of training and experience in working with foreign suppliers to implement these policies and to assure that our vendors are fully compliant. Both our US and our international sourcing teams undergo training on mitigating supply chain risks, including risk of labor violations.

In 2009, our compliance program, including our internal monitoring and accountability, was reviewed and approved by the Fair Labor Association (FLA). For 2012 we expect to add all of our companies into FLA membership, which means that in addition to the factory audits that we undertake or commission ourselves, a certain percentage of all the factories we source from will be subject to external, independent monitoring visits by the FLA, to assure compliance with the FLA’s Workplace Code of Conduct – a global set of principles based on ILO Standards outlining fair working conditions in factories around the world. In addition to external accountability to the FLA, all employees are held internally accountable for compliance with the company’s code of conduct, and all contractors are required to certify compliance as a condition of doing business with any CSS Industries company.

To obtain additional information about our efforts to eradicate trafficking and slavery from our supply chain, please contact the CSS Industries Legal Department at 215-569-9900 or via email to [Legal@CSSIndustries.com](mailto:Legal@CSSIndustries.com).