

Bon-Ton is owned by The Bon-Ton Stores, Inc. ("Bon-Ton") which has established a Social Compliance Guide to which Bon-Ton's suppliers must adhere in order to do business with Bon-Ton. The Social Compliance Guide is designed to protect workers in Bon-Ton's supply chain by ensuring that, among other things, the supply chains are free from slavery and human trafficking. Bon-Ton's efforts in this regard include:

- Bon-Ton's suppliers must verify in writing that they comply with all laws governing forced labor, slavery and human trafficking.
- After Bon-Ton has decided to do business with a supplier, Bon-Ton conducts an audit of the supplier's factories to ensure they comply with Bon-Ton's Social Compliance Guide. The audits are conducted by an independent auditor. Factories are given about three weeks' notice before the audit.
- Bon-Ton audits factories on an annual basis. The audits are conducted by independent third-party auditors. A factory is given three weeks' notice of the audit. As part of the audit process, auditors randomly select employees who are interviewed in private, making it more conducive for employees to speak to the auditors without fear of repercussion.
- If Bon-Ton determines that a factory has violated the law relating to slavery or human trafficking, Bon-Ton will address the problem by (i) working with the supplier in an effort to prevent reoccurrence of the problem; (ii) canceling the affected purchase contract(s); (iii) terminating its relationship with the supplier; (iv) commencing legal action against the supplier; (v) reporting the violation(s) to the appropriate governmental authorities, and/or (vi) taking other actions as warranted.
- Bon-Ton's direct suppliers must certify in writing that materials used in the product comply with slavery and human trafficking laws of the country or countries where they conduct business.
- Bon-Ton's Divisional Vice President of Quality Assurance has direct responsibility for overseeing suppliers' adherence to Bon-Ton's Social Compliance Guide. He is trained on issues regarding human trafficking and slavery. To reduce the risk of slavery or human trafficking being used in Bon-Ton's supply chain, at least once a month he communicates with the Bon-Ton employees and management involved in sourcing to reinforce their understanding of responsibilities with respect to the use of forced labor and slavery.