

source right LLC

EXPERTS IN ETHICAL SUPPLY CHAIN MANAGEMENT

**SOCIAL VENTURE PLAN**



Slave children in Mandsaur, Madhya Pradesh, India  
December 1990 © Sophie Elbaz/Sygma/Corbis



Slave girl in slate mines  
Mandsaur, Madhya Pradesh, India  
December 1990 © Sophie Elbaz/Sygma/Corbis

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## EXECUTIVE SUMMARY

### **Vision Statement**

There are over 27 million slaves in the world today. Globalization has economically exploited millions of people as large corporations have been pressured into finding ways to cut costs to remain competitive.

We believe there is a means and there is a market to foster equitable labor practices, maintaining profitability and competitiveness, while producing high quality products. It is our desire to help corporations be simultaneously socially responsible and profitable – through effective ethical supply chain management.

We envision a world with no slaves, where every person is equal—not in wealth or wisdom or opportunity—but in dignity.

### **Mission Statement**

We strive to create strategic and competitive advantage for our clients through consulting on ethical supply chain management, with the vision of eradicating slave labor worldwide while increasing our clients' profitability.

### **Strategy Statement**

SourceRight, LLC is a consulting firm specializing in supply chain management as it relates to fair labor practices and ethical sourcing. Our strategy allows our clients to increase profitability by improving consumer perception of their brand and innovating efficiency through the entirety of the supply chain, while eliminating unfair labor.

Our clients range from small privately held companies to the largest of multi-national corporations and governments—both local and national. These companies strive to be on the forefront of Corporate Social Responsibility (CSR), but often lack the internal expertise and objectivity to effectively accomplish this goal. Our clients understand that profitability and CSR are complementary in nature.

During our first two years our partners will focus on publishing articles, participating in trade conventions, and hosting round-table discussions as a means of building credibility and promoting our brand. We believe that this will establish our firm as a leader in the field of ethical sourcing and fair labor practice. Over time, more resources will be directed toward consulting practice as credibility and experience become inherent in our brand.

In 2010 the International Standards Organization (ISO) will publish ISO 26000, which will set standards for best practice in Social Responsibility worldwide. The standard will be voluntary to start, but will likely become required for member compliance in the near future. This provides a substantial market opportunity as companies seek to follow the standard in preparation for when it becomes required.

## **Competitive Advantage**

SourceRight, LLC differentiates itself from competitors through unmatched strategic alliances and partnerships with industry experts, government agencies, and leading experts on modern-day slavery and unparalleled expertise in our specific field. Our strategy is to come alongside our clients to engage as partners; a rarity in a world where corporations are accustomed only to criticism from social rights advocates.

## **Social Impact**

The social impact of SourceRight, LLC is two-fold. The operation of our firm inherently accomplishes a social good—prevention of unfair labor practices. Beyond the business, a majority of profits will be invested in further preventative and rehabilitative processes for victims of unfair labor practices.

The social impact we envision is primarily accomplished through effective supply chain management. As we investigate the entire supply chain of a company, from raw materials to the hands of the end user, we hope to eradicate all forms of forced or unfair labor practices. By partnering with local and national governments and non-profit agencies we will conduct thorough investigations of each step of the supply chain to aid companies with compliance of national and international labor standards, including the up-and-coming ISO 26000 standard for Social Responsibility.

[end of executive summary]

## FINANCIAL SUMMARY

<b>Consolidated Proforma Income Statements</b>					
for Fiscal Years 2009 through 2013					
	FY2009	FY2010	FY2011	FY2012	FY2013
<b>Income</b>					
Income from Consulting Fees	\$348,000	\$400,200	\$460,230	\$529,265	\$608,654
Income from Expenses Billed	\$24,000	\$27,120	\$30,646	\$34,630	\$39,131
Income from Conference Fees	\$40,000	\$46,000	\$52,900	\$60,835	\$69,960
Other Income	\$0	\$5,000	\$6,650	\$8,845	\$11,763
<b>Total Income</b>	<b>\$412,000</b>	<b>\$478,320</b>	<b>\$550,426</b>	<b>\$633,574</b>	<b>\$729,509</b>
<b>Expenses</b>					
Salaries & Wages	\$246,000	\$275,520	\$308,582	\$345,612	\$387,086
Repairs & Maintenance	\$1,000	\$1,080	\$1,166	\$1,260	\$1,360
Rents & Utilities	\$30,960	\$30,960	\$30,960	\$30,960	\$30,960
Taxes & Licenses	\$7,180	\$8,175	\$9,256	\$10,504	\$11,943
Advertising & Printing	\$20,000	\$21,000	\$22,050	\$23,153	\$24,310
Employee Benefit Programs	\$36,900	\$41,328	\$46,287	\$51,842	\$58,063
Vehicle Expense - Mileage	\$2,500	\$2,625	\$2,756	\$2,894	\$3,039
Computer Operating Expense	\$1,000	\$1,060	\$1,124	\$1,191	\$1,262
Office Supplies & Expense	\$1,000	\$1,060	\$1,124	\$1,191	\$1,262
Telephone and Data	\$2,400	\$2,472	\$2,546	\$2,623	\$2,701
Internet Expense	\$600	\$636	\$674	\$715	\$757
Services - Expense	\$1,500	\$1,545	\$1,591	\$1,639	\$1,688
Security Services	\$360	\$360	\$360	\$360	\$360
Misc. Expense	\$1,000	\$1,050	\$1,103	\$1,158	\$1,216
Dues - Clubs & Subscriptions	\$1,500	\$1,575	\$1,654	\$1,736	\$1,823
Legal & Accounting	\$20,400	\$22,440	\$24,684	\$27,152	\$29,868
Insurance - Fire, Liability, Misc.	\$5,000	\$5,350	\$5,725	\$6,125	\$6,554
Customer Relations	\$6,000	\$6,780	\$7,661	\$8,657	\$9,783
Amusement/Entertainment	\$2,000	\$2,260	\$2,554	\$2,886	\$3,261
Discount Expense	\$5,000	\$5,350	\$5,725	\$6,125	\$6,554
Travel: Project-Related	\$16,000	\$18,080	\$20,430	\$23,086	\$26,088
Travel: Other	\$10,000	\$11,300	\$12,769	\$14,429	\$16,305
Other Project-Related Fees Billed	\$8,000	\$9,040	\$10,215	\$11,543	\$13,044
Conference-Related Expenses	\$6,000	\$6,720	\$7,526	\$8,430	\$9,441
Meals & Entertainment	\$2,000	\$2,260	\$2,554	\$2,886	\$3,261
<b>Total Expenses</b>	<b>\$434,300</b>	<b>\$480,026</b>	<b>\$531,077</b>	<b>\$588,156</b>	<b>\$651,989</b>
Net Income Before Taxes	-\$22,300	-\$1,706	\$19,349	\$45,417	\$77,520
Provision for taxes on income* (*offset by donations)	\$0	\$0	\$0	\$0	\$0
<b>NET INCOME AFTER TAXES (NET PROFIT)</b>	<b>-\$22,300</b>	<b>-\$1,706</b>	<b>\$19,349</b>	<b>\$45,417</b>	<b>\$77,520</b>

**Financial Narrative**

SourceRight, LLC expects to achieve profitability by its third year. Revenue generated from consulting fees is expected to increase 15% annually for the first five years. The same holds true for revenue projections for conference fees. The 'Other Income' category represents income from shared-profit arrangements and any other opportunities that arise in the course of business. 'Income From Expenses Billed' represents project-related expenses billed directly back to the client, including Project-Related Travel and Other Project-Related Fees Billed.

The 'Provision for taxes on income' remains at zero, as any and all net profits will be donated to eligible charitable organizations, as a part of the company's ongoing commitment to achieving the greatest social impact.

Note that these projections are subject to certain contingencies and risks, as outlined in the Risk Analysis section on page 14.

**Investment Required**

An initial investment of \$60,000 is required for the start-up costs associated with SourceRight, LLC. Operating expenses beyond revenues during the first two years of operations will be financed from a revolving line of credit agreement. An outline of these costs can be found below:

<b>Startup Costs: SourceRight, LLC</b>	
<b>Expense</b>	<b>Amount</b>
Leasehold Improvements	\$10,000
Furniture & Fixtures	\$12,000
Initial Operating Capital	\$25,000
Licensing	\$500
Legal & Accounting: Startup	\$2,500
Computer Systems	\$10,000
<b>Total</b>	<b>\$60,000</b>

**Source of Capital**

SourceRight, LLC is seeking capital from an SBA 7(a) bank-financed loan. The company would also entertain offers from private investors, subject to negotiation of terms. See the Risk Analysis section for more information on the risk associated with an investment in this company.

## MARKET RESEARCH

SourceRight, LLC intends to provide consulting on ethical supply chain management to retailers, distributors, manufacturers and government agents seeking increased profits and greater social responsibility, effectively teaming together to ensure fair labor standards are met throughout the supply chain—from raw materials to end user.

### **The Market for Ethical Sourcing Consulting**

Revenue for fair trade labeled goods grew 41% in the 2007 fiscal year<sup>1</sup>. This demonstrates that the average consumer is becoming more socially aware and willing to change their demand for products that reflect equitable labor and environmental processes.

We intend to target companies involved in sourcing from overseas, who may be vulnerable to high public exposure and scrutiny. Such companies include Ford Motor Company, General Motors, and Whirlpool—all of which have been identified publicly as having sourced steel from parts of Brazil that practice slave labor.<sup>2</sup> These companies are interested in improving their profitability by cutting costs along the supply chain, while still meeting compliance with International Standards Organization (ISO) regulations and seeking to ensure fair labor practices are used throughout the process. These companies are global, and often have operations in newly industrialized countries (NICs) and underdeveloped countries.

As the world continues to globalize through free trade and market forces, we expect this pool of clients to continue to grow well into the future. Fierce global competition drives companies and their sourcing agents to cut costs at all levels, in hopes to gain a competitive edge. This process is sometimes done irresponsibly—disregarding international labor laws—or using slave labor—along the way. More often than not, this is not the intention of the clients we wish to serve; but rather sourcing agents practice these cost-cutting measures to appear more competitive to their customers (our clients), and it is very difficult for companies to verify all sources on their own. And finally, after successful implementation and completion of our consulting service—after annual audits to ensure accountability and continued success—we will register companies as compliant with international labor standards (ideal for the Corporate Social Responsibility section of annual financial statements).

### **The Opportunity to Change the World**

*Education is the key to a brighter future.* A common proverbial phrase, this applies to laborers and uneducated workers abroad. Today, there are still 27 million modern-day slaves—most of whom are forced into labor to provide for themselves or their families, or who work for companies with high barriers to exit<sup>3</sup>. We will use our profits to serve these populations by partnering with organizations that seek prevention of forced labor and/or provide rehabilitation for freed slaves. In addition to our

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<sup>1</sup> Fairtrade Labelling Organizations International (2007). [www.fairtrade.net](http://www.fairtrade.net). URL accessed on Feb. 24, 2008.

<sup>2</sup> <http://www.corpwatch.org/article.php?id=14328&printsafe=1>

<sup>3</sup> Bales, Kevin. "Disposable People: New Slavery in the Global Economy." University California Press: 2006. p.2

partnerships, NGOs and non-profits may submit annual applications for funds, from which we'll select an organization based on our mission statement and annual goal for the fiscal year.

Beyond non-profit partnerships and donating our profits, we will seek to educate our clients about current issues in Corporate Social Responsibility, and how changing labor standards or ISO regulations might affect their business. This education will be provided through direct consulting, our monthly newsletter (*SourceRight Report*), seminars, conventions and a series of roundtable discussions focused on specific topics in the field. SourceRight will be a sponsor of Intertek's Annual Ethical Sourcing Forum<sup>4</sup>— being the only sponsor to focus exclusively on issues of fair labor.

## Competition

Though there are thousands of consultants nationwide, and hundreds that consult on supply chain efficiency – our true competition are only those that have some level of focus on *ethical* supply chain management. There are three firms that represent direct competition to the type of services to be offered by SourceRight.

SustainAbility is a consultancy group and think tank which advises clients on the risks and opportunities associated with corporate responsibility and sustainable development. It also seeks exposure to clients by bringing together a field of experts at conventions and seminars, and has served large clients like Nike and Ford Motor Company. However, Corporate Social Responsibility (CSR) is not all SustainAbility focuses on; they also provide consultancy services in emerging markets, environmentally sustainable development, and corporate governance.

The CSR Group is a consulting and communications firm based in Austin, Texas that consults broadly on issues of corporate social responsibility, corporate ethics, sustainability and CSR communications. In recent years, The CSR Group has put extra emphasis on fair labor practices, and has brought David Batstone from the Not For Sale Campaign onto their 'Network of Experts.'

Strategic Sourcing Solutions<sup>5</sup> is a Pennsylvania-based consulting firm specializing in sourcing as it relates to product development, supply chain management and logistics. The emphasis is very much on cost-savings and efficiency; though the company has responded to market demand in recent years by adding a 'compliance inspection' component to their roster of services – emphasizing Child Labor and Forced Labor as their first two areas of inspection.

As a company formed on the basis of ethical supply chain management and how it relates unfair labor practices, SourceRight LLC can become the expert in the field. Rather than adding an 'ethical sourcing'

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<sup>4</sup> The 2008 Ethical Sourcing Forum (ESF) took place in New York from March 13-14. The annual forum, hosted by Intertek—a leading provider of quality and safety solutions serving a wide range of industries around the world—brings together corporations, politicians and consultants to discuss standards and practice of ethical sourcing. Recently the forum has focused primarily on environmental issues, allowing SourceRight to be the leading sponsor for issues of fair labor practice in ethical sourcing.

<sup>5</sup> The company referenced is actually called "SourceRight Group," but for lack of confusion, their tagline has been used as their primary identity in this document. Early research shows that no legal issues exist surrounding the similarity of the names, though SourceRight LLC is not bound by their current name choice.

component to a broad range of services, SourceRight will focus on becoming *the* expert consultant on issues of forced labor.

### **Political and Cultural Factors**

In the course of our business we may likely encounter resistance from governments (both local and national) in the lesser developed countries where slave labor is more common. Brazil, for example, has a patrimonial culture which promotes client-patron relationships between local elites and their constituency. It might sometimes be difficult to convince these elites that adhering to certain labor compliances benefits all parties involved, as they might be more interested in protecting the interests of local businesses instead. In addition, Brazil lacks a centralized collection and reporting system for anti-trafficking law enforcement data; therefore, no comprehensive data on trafficking investigations, prosecutions, convictions, or sentences are available for the local authorities to pursue prosecution of violators.<sup>6</sup> We plan to address these political and cultural factors by working closely with organizations that already have established relations with our target regions, like the Ethos Institute in Brazil. Furthermore, when necessary international authorities and regulators will be involved in governmental interactions.

### **Pricing**

The current market price for similar consulting services is about \$8,000 for full-time monthly fees. In most cases, clients are billed an hourly fee, separately for administrative and direct consulting. Externally incurred fees such as travel are negotiated and billed directly to the client. During the first two years of operations, our fees will be lower than the market average as we build credibility and experience.

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<sup>6</sup> <http://gvnet.com/humantrafficking/Brazil-2.htm>

## PROCESS, PRICING & OPERATIONS

### Process

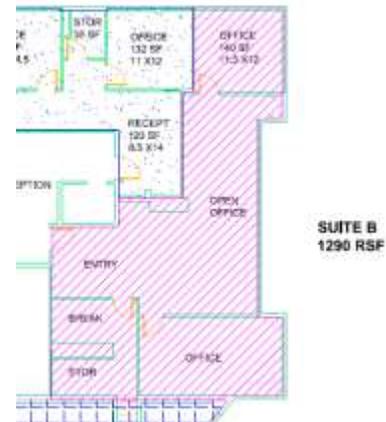
SourceRight will seek to be the leader in its field. The authors of this plan have done a great deal of research and will build strategic alliances with current industry experts and leaders. During the first two years great emphasis will be put on building credibility and experience.

### Pricing

We will begin our pricing at \$125/hr for professional consulting, and \$50/hr for related administrative work (filing, data entry, etc). We will reevaluate our fees as we gain more experience, credibility and exposure.

### Operations

Our headquarters will be located at 3161 Elliot Avenue in Seattle, Washington. The building currently has 4,000 square feet of third-level view office space available overlooking Elliot Bay and Myrtle Edwards Park. The rent of \$24/sq ft/year includes utilities, shared conference room and an on-site fitness facility.



**Diamond Building – 3161 Elliot Avenue, Seattle, Washington**  
4,000 available square feet of third-level office space with water and park view  
Rent includes utilities, shared conference room and on-site fitness facility

## SOCIAL IMPACT

We will measure the success of our impact in two ways: through the effective removal of all unfair labor practices, and through our clients' improved efficiency and image resulting in increased profits. When slave labor is found in any part of a company's supply chain, there are two possible solutions: the company can choose to sever ties with the vendor, or the vendor will change processes to comply with both national and international labor standards. Local labor inspectors, part of our strategic alliances, will conduct regular investigations of the related premises to ensure continued compliance. Growth for SourceRight means more than just increased profitability; we value increased sustainability in our social impact. Our motivation comes not from our salary but from the good we create.

SourceRight, LLC is committed to continued awareness, prevention, and rehabilitation for the victimized. Beyond the tangible results mentioned above, we will expand our social impact by:

- Using available methods to raise awareness of the issue of modern-day slavery including, but not limited to, presentations at trade conventions, publishing articles, and *SourceRight Report*, our monthly newsletter.
- Each trade convention will showcase a specific non-profit working for equitable labor practices, and all profits from each convention will be given to the featured organization.
- Each fiscal year SourceRight, LLC will donate the majority of our profits to strategic partnerships and initiatives with an organization working on the front lines of fair-labor practices.

Finally, we will measure the success of our social impact by the increased profitability of our clients. Through effective supply chain management, our clients will be able to offer slave-free products to a consumer market demanding products that are equitable and reflect high quality. Thus, as our clients' profitability increases, the demand for fair labor is further proven, and our impact is greater.



## RISK ANALYSIS

An investment in SourceRight, LLC involves a high degree of risk. In evaluating an investment in the company, investors should carefully consider the following factors:

**No history of performance.** While consultants nationwide have performed well, SourceRight has no record or performance upon which to base projections, financial or otherwise.

**Uncertainties in the economy.** Though the local region is experiencing growth in the industry, nationwide trends indicate that the economy may be entering a recession, which could have an adverse effect on the success of any startup.

**Dependence on key personnel.** The company's success largely depends on the personal efforts and abilities of Kelly Hogan, Joel VanderHoek and Jason Williams. The loss of the services of any of these individuals could have a material adverse effect on the company. It is the intention of the company to secure a "key person" life insurance policy in the amount of \$1.0-million on each of these persons. There can be no assurance that such insurance will be available at an acceptable cost, if at all, or would adequately compensate the company for a loss of services.

**Recent entry of competitors.** As the market has changed, several existing consulting services have begun to focus on labor-rights issues and compliance inspection services. This recent entry of competitors, those listed in this plan and otherwise, could have an unpredicted and materially adverse effect on the success of SourceRight, LLC.

**Competition.** The company operates in a highly competitive environment. In addition to the existing competitors, new competitors may enter the market at any time.

**Variability in costs.** The profitability of the company is dependent on the costs of doing business remaining at or near projected levels. It is possible that prices will increase significantly, and that the company may not be able to pass on such increases in the form of higher prices without experiencing significant volume declines, which would have an adverse effect on the company's profitability.

**Control by existing shareholders.** The authors will hold a majority of the existing stock after completion of the first seed round of financing. As a result, the authors will effectively be able to control most matters requiring approval by the company's shareholders, including the election of a majority of the company's directors. The authors would also be able to delay, deter, or prevent a change in control of the company. By exercising options, the authors may be able to effectively control the company indefinitely, even after additional rounds of financing.

**Immediate and substantial dilution.** Purchasers of shares of the stock of SourceRight, LLC will incur immediate and substantial dilution in the net tangible book value per share. In addition, investors purchasing shares will incur additional dilution to the extent the company offers options or warrants to employees and directors, or raises funds through additional rounds of private placement or an initial public offering.

**Financing uncertainty.** Successful implementation of the business plan may require significant additional financing, either through additional equity investment, bank loans, or debt offerings. There can be no assurance that any such financing will be available to the company on terms acceptable to it, if at all.

**Financial forecasts.** The financial forecasts in the business plan reflect the company's judgment as to the expected conditions and results of operations in the forecasted period. The ability of the company to achieve the results in the business plan depends on financial, business, competitive, regulatory, and other factors affecting the company and the industry in general, as well as prevailing economic conditions, some of which are beyond the control of the company. The assumptions to the financials identified in the business plan are those the company believes are significant to the forecasts. No representation can be made with respect to the company's ability to achieve the forecasted results. It is likely there will be differences between the forecasted and actual results because events and circumstances frequently do not occur as expected.

**Lack of dividends.** There can be no assurance the company will have sufficient earnings to declare and pay dividends to the holders of the common stock, and in any event, a decision to declare and pay dividends is at the sole discretion of the company's board of directors. The company does not currently anticipate declaring and paying any dividends in the foreseeable future. It is the company's intention to apply any net earnings to increasing its capital base, and to expansion through new store openings.

**Illiquidity.** There is currently no public market for the common stock of SourceRight, LLC. Consequently, holders of the stock must be prepared to hold their shares for an indefinite period of time.

**Offering price.** The offering price for the common stock of SourceRight, LLC, does not necessarily bear any relationship to the asset value, net worth or financial condition of the company, or to any other generally recognized criteria of value, and should not be regarded as an indication of any future value of the stock.

## CONCLUSIONS

### Need and Opportunity for Social Impact

Imagine a world with no slaves, where every person is equal, not in wealth or wisdom or opportunity, but in dignity. Imagine a world where everyone faces the same sort of problems we all face—earning a living, taking care of children, making a marriage work. This is a world where children do not work sixteen-hour days so we can have a pretty rug in our living room. This is a world where parents do not have to choose between food and freedom for their children. This is a world without slavery, and now, more than at any time since the first laws to abolish slavery were passed in 1807, it is within our reach.

The United States formally abolished slavery in 1865 and countries across the world followed suit. Today slavery is not legal anywhere, and yet there are an estimated 27 million persons in slavery worldwide. Generational debt bondage, indentured servitude, child labor, and forced labor are a few of the many forms of this multi-billion dollar industry that profits off of the near-endless supply of human beings. Where poverty is rampant, people are desperate, and slave traders are the masters of exploitation. Recent scandals among companies like Gap and Nike have brought light to the issue of child labor in sweatshops, but this is only the tip of the iceberg. Everyday people eat, touch, use and wear products tainted by slavery. There are hundreds of grassroots organizations that are combating this issue head on, and a few more prominent like International Justice Mission and Free the Slaves.

A world without slaves is a richer world. Every slave is a creative intelligence in shackles. Yes, slaves make things, but slowly and often poorly. They feed into the production side of the economic equation, but they consume almost nothing. They may eat, but they cannot build, except when ordered to and never for themselves or their loved ones. Freed slaves stretch out and dream, then work hard to turn those dreams into reality. Slaves know how to work, and in freedom they work furiously to make their lives stronger, richer; more secure. Without the affliction of slavery, poor countries begin to grow. When workers don't have to compete with slaves, wages go up.

Without the curse of slavery, our ethical dilemmas diminish as well. Today many are troubled by the ugly fact of slavery in our lives. Every day as the message spreads, more people worry about their consumption. But imagine never having that pang of doubt when you buy something you like, never having to wonder "whose freedom was stolen to make this?"

Imagine the 27 million people who are in slavery today, waking up tomorrow in a flood of joy. Their lives won't be perfect, their lives won't have any more of a guarantee of happiness than yours or mine, but they will have a chance, which is all that any of us asks for.

### Conclusions on Consulting—Ethical Supply Chain Management

As consumer awareness of modern day slavery grows, consumer demand for ethical sourcing grows. As demand grows, companies that respond by proving their commitment to ethical sourcing will succeed, while others will fall behind. Furthermore, as international policy and enforcement increases, violators will suffer consequences.

Though existing consultants have acted to respond to this new market, none have yet been formed specifically to address this issue and opportunity. The growth in demand alone is enough to substantiate the entry of SourceRight into the market; but it is the need for an expert in this specific field that truly substantiates the need for SourceRight.

Corporations are often subject to bad press and nagging from social rights organizations, but by coming along side companies—engaging as partners—SourceRight will practice a new breed of social justice: one where slaves are freed and companies thrive—simultaneously.



**May 2007 – Hongdong County, Shanxi, China**

Thirty-one people, forced to work for a year as slaves, given only bread and water and no pay were rescued at a brickworks run by the son of a local Communist Party official, state media reported on June 8, 2007. The slaves suffered beatings, long hours, nutritional deprivation and a loss of dignity—all for cheaper mud bricks.

Photographed May 27, 2007 © China Daily/Reuters/Corbis



[WE ENVISION A WORLD FREE OF SLAVES]

Trader Joe's, a privately-held grocer based in Monrovia, CA offers almost exclusively organic and fair-trade goods and touts their commitment to ethical sourcing. The company has experienced tremendous success as consumer demand for ethically-sourced products has consistently increased.



A busy Trader Joe's grocery store  
Chapel Hills, North Carolina  
November 30, 2007 © Jonathan Bloom 2008



Shoppers line up outside Trader Joe's store  
Brooklyn, New York  
Photographer Unknown, 2006

**KELLY HOGAN**

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**JASON WILLIAMS**

**source right** LLC

EXPERTS IN ETHICAL SUPPLY CHAIN MANAGEMENT

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