

MCKEE FOODS CORPORATION

POLICY TO COMBAT SLAVERY AND HUMAN TRAFFICKING (California Transparency In Supply Chains Act Disclosure)

Effective January 1, 2012, the California Transparency in Supply Chains Act requires large manufacturers to publicly disclose their efforts to eradicate slavery and human trafficking from their direct supply chains. McKee Foods' efforts in this regard are discussed below. We may update this Policy going forward to reflect new information and guidance.

McKee Foods' [Company Statements](#) includes our commitment to how we treat people — with respect, with integrity and overall, with responsibility. Slavery and human trafficking are diametrically opposed to those values. We strongly support the goal of eliminating slavery and human trafficking wherever they exist.

Our suppliers are subject to a [Supplier Code of Conduct](#). The Code of Conduct includes a prohibition on any forced labor, indentured labor, slavery, servitude, or human trafficking. The Code of Conduct also states that McKee Foods and its contractors may access and inspect supplier facilities. That access could, in some cases, be immediate and unannounced.

Under the Code of Conduct, the supplier commits that the materials incorporated into the supplier's products will comply with the laws regarding slavery and human trafficking of the countries in which the supplier operates. We do not currently have a certification requirement.

We periodically communicate with suppliers about this Policy and the Code of Conduct, and we ask suppliers to describe for us any other steps they are taking to insure that their supply chains are free of slavery and human trafficking. We do not currently engage third parties to verify those supplier efforts.

We regularly audit suppliers for various purposes. The audits are not conducted for the purpose of determining compliance with the prohibition on slavery and human trafficking. However, we will promptly investigate any credible claim or indication that a supplier engages in slavery or human trafficking. If we then

determine that a supplier has engaged in such activities, we will take appropriate steps such as discontinuing purchases from the supplier.

Our employees and management with direct responsibility for supply chain management receive training regarding slavery and human trafficking. The training specifically focuses on mitigating risks within supply chains.

Any employee who violates this Policy to Combat Slavery and Human Trafficking may be subject to appropriate discipline. Such discipline may include termination of employment. Similarly, we may terminate our business relationship with any contractor who violates this Policy.