

MCKEE FOODS CORPORATION
POLICY TO COMBAT SLAVERY AND HUMAN TRAFFICKING

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' current efforts in this regard are discussed below. Since this law is relatively new, we plan to continue to gather information and guidance about the law and its goals. We may update this Policy going forward to reflect such new information and guidance.

McKee Foods' [Guiding Values](#) include respect for people, doing business with integrity, and overall 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 representatives and contractors) may access and inspect supplier facilities. That access could, in some cases, be immediate and unannounced.

We are in the process of requiring our suppliers to certify that materials incorporated into their products comply with the laws regarding slavery and human trafficking of the countries in which those suppliers do business. We are also asking our suppliers to affirm their agreement to the Code of Conduct, and we are communicating with them to evaluate their efforts to insure that their supply chains are free of slavery and human trafficking. We do not currently engage third parties to evaluate those efforts.

We regularly audit suppliers for various purposes. Typically audits are not conducted solely 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 are receiving 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 is 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.