

California Transparency in Supply Chains Act of 2010

Under the *California Transparency in Supply Chains Act of 2010*, Bumble Bee provides the following information to demonstrate its efforts to eradicate slavery and human trafficking from its direct supply chain:

- Product Supply Chain Verification/Certification. As part of onboarding new direct suppliers, the Company ensures that the suppliers receive and understand the Company's *Supplier Code of Conduct*. First tier suppliers certify that materials incorporated into the Company's products comply with the laws regarding slavery and human trafficking of the country or countries in which they conduct business through their agreement to comply with our Supplier Code of Conduct.
- Supplier Auditing. Based on perceived risk, the Company commissions third-party, independent, semi-unannounced social audits of its tier one suppliers to evaluate and address the risk of human trafficking and slavery. As part of this process, the Company reviews the audit results to determine compliance with Company standards regarding human trafficking and slavery.
- Internal Accountability Standards. The Company has an internal compliance program that includes a Code of Conduct that addresses human trafficking including a requirement for employees to immediately report any suspicion of forced labor or human trafficking. The Company also maintains a platform through which team members can anonymously report any concerns. The Company commissions third-party, independent social audits of its own facilities on a regular basis.
- Training. The Company provides all its salaried employees regular third-party developed, online training on forced labor and human trafficking and slavery.