



# Supplier Transparency

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## Cumberland Packing Corp. Information Regarding California Transparency In Supply Chains Act of 2010

Cumberland Packing Corp. ("Cumberland") is committed to a zero tolerance policy on human trafficking and forced labor. The State of California Transparency in Supply Chains Act of 2010 requires certain retail sellers and manufacturers to post a disclosure on their web site regarding their efforts to combat human trafficking and forced labor in their supply chains. Cumberland is committed to working with suppliers who share the same values and respect for human rights as Cumberland. Accordingly, Cumberland has established the following guidelines when dealing with potential suppliers.

**1. Risk Assessments** - Cumberland performs preliminary risk assessments for slavery and human trafficking of potential suppliers according to a risk based approach based on any suspected or known risks, and country location. As discussed below, each Cumberland supplier will be visited and inspected by Cumberland and/or its representatives to confirm such preliminary risk assessment.

**2. Auditing** - Each existing and proposed Cumberland supplier has been inspected by Cumberland employees and/or independent representatives. If Cumberland should identify any suppliers at high risk for slavery or human trafficking, such suppliers would be subject to an on-site audit to determine if such suppliers are meeting the ethical and quality standards set by Cumberland. Cumberland will determine at the time of such audit whether the audit will be conducted by Cumberland, or its designee or an independent third party.



**3. Certification** - Cumberland is in the process of reviewing and establishing a certification procedure to either (i) require direct suppliers to certify that they are complying with all laws and regulations related to slavery and human trafficking, or (ii) require such compliance by the Supplier contractually as agreements are entered into or renewed.

**4. Internal Accountability** - All employees and contractors of Cumberland are expected to comply with all laws, including laws addressing slavery and human trafficking. Failure to adhere to the applicable laws may result in disciplinary action up to and including discharge and termination by Cumberland.

**5. Procurement Training** - Cumberland encourages employees who are responsible for supply chain management to obtain training on all aspects of supply chain management including on how to mitigate risks of slavery and human trafficking within the supply chain. Such training may include seminars, webinars, or internal presentations.

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