

California Transparency in Supply Chains Act

Gold Creek, LLC, its subsidiaries and affiliates, including without limitation Gold Creek Foods, LLC and Gold Creek Processing, LLC (the “Companies”), produce their products at plants in the United States under the inspection of the United States Department of Agriculture and in compliance with applicable federal, state, and local laws. The California Transparency in Supply Chains Act (the “CTSCA”) applies to a business selling products in California. The CTSCA does not require a business to implement standards to ensure that its product supply chains are free from human trafficking and slavery. Instead, the CTSCA only requires a covered business to disclose to what extent, if any, that it does the following: (1) engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery; (2) conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains; (3) requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business; (4) maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking; and (5) provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products. As to each category, the Companies do not take any actions except to the extent that the same are contractually required of the Companies by its suppliers or other parties with which the Companies may contract. Various suppliers with which the Companies contract require that the Companies adhere to an absolute prohibition on the use of human trafficking, slavery, and/or involuntary labor of any kind, including child labor and indentured labor, and the Companies do in fact comply with all such prohibitions. The Companies further show that, with regard to its workforce, they comply with all applicable laws, whether they be at the national or local level, concerning age requirements, child labor, working conditions (to include safety, health, and cleanliness), hours worked and wages earned.