



CALIFORNIA TRANSPARENCY STATEMENT

On January 2012, the California Transparency in Supply Chains Act became effective. This California statute requires retailers and manufacturers to disclose “efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale.” At Primary Products Ingredients Americas LLC (“Primient”), our people are our most valuable resource. Together, we are helping to shape our business, drive positive impact in the communities we call home, and support sustainable practices towards a brighter future.

Primient supply agreements require suppliers to undertake work in accordance with all applicable laws, regulations, standards and codes of practice, including but not limited to child labor, forced labor, or unfair labor practices. This provision, in addition to the Primient Code of Ethics and Supplier Code of Conduct, underscore the Company’s commitment to lawful and ethical practices, including labor practices.

Our Supplier Code of Conduct directly prohibits our suppliers from engaging in forced labor, child labor or unfair labor practices. Compliance with our Supplier Code of Conduct is a requirement in our terms and conditions with suppliers. A copy of the Supplier Code of Conduct can be found on our website: [Supplier Code of Conduct](#)

We believe that the risk of slavery and human trafficking within our own organization is substantially avoided and mitigated as a result of the policies, standards, practices and training and awareness programs that we have in place; the oversight built into our line management structure and business operations; our use of the Sedex social and ethical compliance system (www.sedexglobal.com) including external, third-party audits of our manufacturing facilities against the Sedex Members Ethical Trade Audits (“SMETA”) 4- Pillar protocol¹ - which includes assessment against the Ethical Trading Initiative (ETI) base code requirements; and, the knowledge and integrity of our staff. The third-party audits referenced above cover a variety of potential issues including child labor, forced labor, health and safety, freedom of association, the right to collective bargaining, discrimination, disciplinary practices, working hours and remuneration. This same framework has informed our new Responsible Sourcing (supplier audit) Program which has been rolled out to our supply chain where relevant.

Primient trains its employees in a variety of areas, including ethical business conduct. The Company does not maintain internal accountability and procedures for employees or contractors related to failing to meet standards specifically regarding slavery and human trafficking. However, the Company maintains a robust ethics and compliance program which encourages reporting and is designed to identify and promptly address unethical or unlawful business practices, including labor practices.

¹ The SMETA 4-Pillar audit protocol is a standardized international audit procedure and checklist to audit sites against local laws and international standards for Labor / social compliance, Safety & Health, Environment and Business Integrity; including for labor / social compliance the Ethical Trading Initiative (ETI) Base Code - which is itself based on the ILO (International Labor Organization) Core Conventions and the UDHR (Universal Declaration of Human Rights). These audits are conducted by independent, third-party accredited audit companies using auditors that are trained and certified to conduct them.