



As of January 1, 2012, California's Civil Code section 1714.43 (California Transparency in Supply Chains Act of 2010) requires disclosure statements to be made on certain manufacturers and retailers websites concerning their efforts to eradicate slavery and human trafficking within its direct supply chain. The law identifies five specific areas of required disclosure: verification, audits, certification, internal accountability, and training. This webpage is intended to fulfill those requirements through a description of our process as set forth below:

**Verification:** SunOpta requires its new key ingredient and food contact packaging suppliers to answer a social responsibility questionnaire. The questionnaire asks about the social policies adopted by the supplier and the working conditions provided for its employees. SunOpta reviews the answers on the questionnaire and decides whether that supplier is aligned with SunOpta's standards before SunOpta does business with the supplier. SunOpta also requires its new key ingredient and food contact packaging suppliers sign the SunOpta Supplier Partner Code of Conduct. Included in the Supplier Partner Code of Conduct is the expectation that suppliers share in our commitment to the rule of law and to compliance with applicable laws, including those related to slavery and human trafficking. SunOpta is currently evaluating its practices as they relate to nonessential suppliers and may expand its scope to include additional suppliers in the future. A subsidiary of SunOpta is a member of SEDEX and has a Fair Trade USA Certificate and a Fairtrade FLO Certificate. When that subsidiary identifies a potential risk, it initiates certification and/or engages third-party audit services.

**Audits:** Other than the verification and audit activities of the subsidiary described above, SunOpta does not engage in a physical audit of its suppliers related to social compliance matters. However, as part of the questionnaire suppliers complete, SunOpta asks whether the supplier has previously been socially audited and certified according to a social standard. Several of SunOpta's suppliers have completed a social compliance audit under other circumstances.

**Certification:** By signing the Supplier Partner Code of Conduct, SunOpta requires its suppliers to make a certification that they comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. In addition, suppliers

agree to comply with SunOpta's Supplier Partner Code of Conduct in the terms and conditions of each Purchase Order.

**Internal accountability:** Each business function has a relationship with its suppliers and is responsible for determining whether its suppliers within that business function comply with company standards regarding human trafficking and slavery. In addition, SunOpta offers a confidential ethics hotline for its employees to call should a concern arise relating to any ethical matter at the workplace. If an ethical violation is reported, then SunOpta will investigate and respond to such claim in a prompt and responsible manner and take appropriate action.

**Training:** SunOpta is evaluating the implementation of an ethical sourcing training program for SunOpta employees who have the responsibility for purchasing products. SunOpta requires its new key ingredient and food contact packaging suppliers to read and sign the Supplier Partner Code of Conduct, which outlines the expectations of its suppliers, and all of its suppliers additionally agree to comply with SunOpta's Supplier Partner Code of Conduct in the terms and conditions of each purchase order. Included in the Supplier Partner Code of Conduct is the expectation that suppliers share in our commitment to the rule of law and to compliance with applicable laws, including those related to slavery and human trafficking.

We support the objectives of the California Transparency in Supply Chain Act of 2010 and confirm that, to the best of our knowledge, SunOpta and our supply chain partners do not engage in slavery or human trafficking.

Our company has evolved to become one of the leading players in the natural, organic and specialty foods business categories in North America and the world. Driven by our commitment to the health and well-being of our customers, communities, and the environment, we manage our business with strongly held values and maintain high quality and certification standards in all our operations.

As such, we have established the SunOpta Supplier Partner Code of Conduct policy to govern all our suppliers in the areas of corporate social responsibility and to set out our philosophy, guidelines and policies as they relate to, among other things, slavery, human trafficking, forced labor, child labor, working hours, and working conditions of the employees of our suppliers.