



Disclosure in Compliance with SB 657 California Transparency in Supply Chains Act (Human Trafficking and Slave Labor)

Being deeply concerned that the scourge of trafficking in human beings inflicts enormous suffering in the world today, Prime Time International considers unacceptable that millions of people are treated as commodities and slaves and therefore denied their basic human rights and dignity.

Therefore, consistent with our mission to grow and deliver the safest and best-tasting produce in the marketplace, Prime Time is committed to complying with the requirements of the law as well as providing the public with agricultural products that are free of forced labor.

The California Transparency in Supply Chains Act (SB 657) requires many companies, including Prime Time, to disclose on their websites the efforts they take to eradicate slavery and human trafficking from their direct supply chains. SB 657 requires disclosures regarding verification, auditing, certification, internal accountability and training. On that regard, we employ the following policies and procedures.

Verification

Prime Time contracts with Primus Labs, Inc. to provide a third party verification regarding safe food production program in various areas including employee safety and hygiene. Primus Labs performs yearly inspections including field and facility audits to ensure compliance with applicable state and federal legislation.

In addition, Prime Time provides each labor supplier and affiliated growers with a questionnaire and requires their participation and answers regarding existence of forced labor in their operations, legal compliance, and preventive measures in place. Upon receipt and review of the questionnaire, if any answers appear to be unacceptable, Prime Time investigates the supplier and assists in the implementation of corrective measures.

We believe that monitoring our labor suppliers and affiliated growers reduces the risks of human trafficking and slavery in our supply chain. Prime Time expects all suppliers to comply with antislavery and human trafficking laws.

Auditing

Prime Time reserves the right to audit its labor suppliers. Prime Time has not engaged third parties to conduct audits.

Certification

Prime Time requires that all suppliers comply with all applicable laws, including laws against slavery or human trafficking. As part of that effort, Prime Time submits questionnaires to labor suppliers regarding their practices and procedures aimed at identifying and preventing forced labor.

Internal Accountability

Prime Time does not knowingly employ slaves or trafficked persons. In addition, we require all labor suppliers and affiliated growers to provide information regarding legal compliance and the existence of forced labor and/or human trafficking in conducting their operations. Contractors who fail to comply may be prevented from conducting further business with Prime Time and dropped from its supply chain. Moreover, employees who knowingly engage in human trafficking or forced labor are subject to disciplinary action.

Training

Managers and employees have a direct responsibility not to promote the proliferation of slavery and human trafficking in supply chains. In that regard, beginning January 1, 2012, we plan to meet with and provide managers and administrators who have direct responsibility for labor supply chains with training on slavery and human trafficking. This training will cover prevention and elimination of human trafficking and forced labor as well as the penalties associated with violating laws and procedures related to human trafficking and forced labor.