

Disclosure
California Transparency in Supply Chains Act of 2010

Pulmuone Foods USA, Inc. through its parent company, Pulmuone Holdings Co., Ltd. is a proud participating member of the United Nations Global Compact. As such, we embrace, support and enact, within our sphere of influence, a set of core values in the areas of human rights, labor standards, the environment and anti-corruption. Our commitment extends to our supply chain, and our suppliers play a critical role in ensuring that we manage our business in a responsible manner.

In 2010, the California Transparency in Supply Chains Act (“The Act” also referred to as SB 657) was signed into law, and statutes enacted under the Act became effective on January 1, 2012. The Act requires disclosure of particular efforts to eradicate slavery and human trafficking. Pulmuone Foods USA, Inc. is committed to conducting its business in a lawful and ethical manner and expects its suppliers to conduct themselves in the same manner. To further that effort, and in compliance with The Act, Pulmuone Foods USA, Inc. is in the process of developing and undertaking the following steps:

1. We are engaging an independent, third party survey of our vendor supply chains in order to evaluate and to address risks of slavery and human trafficking inherent in those activities.
2. We are engaging independent, unannounced audits of our suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.
3. We require our 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. We maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
5. We provide company employees and management, who have direct responsibility for supply chain management, on-going and periodic training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.

Any supplier that is not able to provide the foregoing certification will be required, as a condition to continuing to supply materials to Pulmuone Foods USA, Inc. to submit an action plan to achieve such certification within a reasonable period of time. Those suppliers that fail to comply will be subject to increasing levels of discipline, up to and including termination of their relationships with Pulmuone Foods USA, Inc. In an effort to verify supplier responses and to help Pulmuone identify areas of increased risk of slavery and human trafficking, we are requiring that our suppliers complete a survey identifying measures they have taken, or intend to take, to prevent these abuses.