



Policies & Practices: California Transparency in Supply Chains Act

SunRice Group, through its U.S. subsidiary SunFoods LLC (collectively “SunRice”) distributes rice products, and mills and packs locally sourced rice in the U.S. SunRice is dedicated to promoting transparency and ethical practices within its global supply chain to combat modern slavery and human trafficking. In alignment with this commitment, SunRice complies with the California Transparency in Supply Chains Act of 2010. This Act mandates that manufacturers and retailers disclose their efforts to eliminate slavery and human trafficking from their supply chains.

Verification:

SunRice is committed to monitoring the domestic and international landscape to respond to evolving challenges and opportunities to minimize the risk of modern slavery in its operations and supply chains.

SunRice utilizes a grievance mechanism, “Speak Up,” that affords its workers, customers and those in its supply chain the opportunity to confidentially speak freely and openly about concerns or issues through a range of channels including an e-mail address and hotline. The Speak Up hotline is managed by an independent third party. Any concerns that are raised through the “Speak Up” reporting channels are reviewed on a regular basis and are updated on our risk profile and controls where relevant.

Audits:

SunRice utilizes EVELATE’s integrated risk platform EiQ (a third-party risk and due diligence tool) to draw on publicly available data sets, along with proprietary supply chain risk information and other calculations, to identify and assess modern slavery risks in the SunRice supply chain.

SunRice audits its sites in the U.S. These audits are announced beforehand and completed against the Sedex Members Ethical Trade Audit (“SMETA”) methodology. The purpose of the audits, which are conducted by SMETA approved auditors, is to understand the labor, health, safety, business ethics and environmental performance of a particular site and identify and risks to working conditions, overwork, discrimination, underpayment and forced labor.

Certification Requirements:

SunRice publishes its standards and expectations of business practices for suppliers in a Supplier Sustainability Code that includes provisions around preventing forced labor practices and exploitation within its supply chain. The Supplier Sustainability Code states that SunRice is opposed to all forms of forced and compulsory labor and is committed to developing a secure and ethical supply chain to exceed our consumers’ expectations, and to support efforts globally to reduce exploitative labor practices. Clauses that refer to the Supplier Sustainability Code are included in most of SunRice’s contracts to outline its expectations of suppliers and support compliance with its code.

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**Internal Accountability:**

SunRice has several policies informed by internationally recognized human rights standards and industry collaboration codes which are communicated to our employees through the SunRice intranet, email, training modules and other forms of communication.

We hold our employees and suppliers accountable for their actions. Breaches of the SunRice Code of Conduct are investigated where appropriate. Speak Up reports are dealt with sensitively and assessed to determine if they should be investigated. Where they are to be investigated, that is done in a thorough, fair and independent manner.

Training:

SunRice mandates continued training for our employees on issues regarding human trafficking and slavery. Employees receive mandatory Code of Conduct training as part of their induction training. The training is required to be completed every two years. Information related to the Code of Conduct is also included in the SunRice Group employee booklet at induction, which states that we do not tolerate child labor or forced labor practices.

SunRice also outlines its expectations with respect to freedom of association, force labor and human trafficking, child labor, working hours, wages and benefits, servitude, and diversity and inclusion in the Labour Rights Standards Policy which is a key component of training.