

Disclosure

The California Transparency in Supply Chains Act of 2010 (SB 657) requires retailers and manufacturers to disclose measures used to track possible slavery and human trafficking in their supply chains. The following is Frontier Co-op's disclosure:

1. Verification

Frontier Co-op's verification of its food and essential oils supply chain labor practices includes the co-op's Well Earth program, as well as fair trade certification and SEDEX Members Ethical Trade Audits (SMETA). To apply for inclusion in Well Earth, suppliers complete a comprehensive sustainability questionnaire that addresses labor practices, including the presence of forced labor or other exploitative labor practices. Using the questionnaire responses, a risk assessment of the applicants' labor practices is conducted by an internal team, which includes members of Frontier Co-op's senior management. This process is complemented by an onsite inspection of the supplier. In addition to the Well Earth program, Frontier Co-op verifies labor practices associated with a number of its products through its partnership with Fair Trade USA and through SMETA audits. 23 percent of Frontier Co-op's food and essential oils products are sourced from suppliers who are Well Earth partners and/ or fair trade certified/ SMETA audited.

2. Audits

In addition to review of suppliers' questionnaires, the Well Earth application process includes an announced onsite audit by a member of Frontier Co-op's purchasing team. The Well Earth audit covers labor practices as well as other sustainability parameters. Frontier Co-op's fair trade certified suppliers are audited through a process overseen by Fair Trade USA, and SMETA audits are conducted by an accredited auditing firm. 23 percent of Frontier Co-op's products are sourced from suppliers who are subject to Well Earth and/ or fair trade/ SMETA audits. Additionally, Frontier Co-op's Supplier Compliance Policies state that supplier facilities be made available to Frontier Co-op for inspection of labor practices at any time.

3. Certification

Frontier Co-op's Supplier Compliance Policies require suppliers to certify that materials being supplied to Frontier Co-op comply with the laws regarding slavery and human trafficking of the countries in which they are doing business.

4. Internal Accountability

All Frontier Co-op employees must adhere to the company's Business Ethics and Conduct Policy, which includes the requirement that employees conduct business in accordance with the letter, spirit, and intent of all relevant laws, including labor laws, and refrain from any illegal, dishonest, or unethical conduct. The policy specifically mentions knowingly doing business with suppliers who have slavery and human trafficking in their operations or supply chain. The Business Ethics and Conduct Policy is enforced through a disciplinary policy and procedure, which in the most serious cases may result in an employee's termination.

5. Training

Currently, Frontier Co-op does not provide employees with training on human trafficking and slavery.