

Corporate Disclosure in Compliance with SB657 California Transparency in Supply Chain Act

Beginning January 1, 2012, the California Transparency in Supply Chain Act requires retailers and manufacturers above a certain size doing business in California to disclose its efforts to eradicate slavery and human trafficking in its direct supply chain.

Niagara Bottling, LLC (Niagara) believes in the importance of international and human rights standards. We prohibit any form of slavery or trafficked labor at Niagara and within our supply chain. We conduct business in compliance with our Company Values and company policies, emphasizing strong adherence to high professional and social standards regarding legal and ethical responsibility.

Verification, Audits, and Certification

Niagara engages in verification of its product supply chain by conducting audits of suppliers to evaluate supplier compliance with Niagara's Supplier Code of Conduct, which strictly prohibits slavery and human trafficking. Such audits are conducted by Niagara and/or third party auditors and may be announced or unannounced. Niagara also requires its suppliers to certify (via our standard terms & conditions) that materials incorporated into products supplied to Niagara comply with laws regarding slavery and human trafficking in the United States and in the country in which they are doing business, if applicable.

Accountability Standards and Procedures / Training

Niagara requires all suppliers to meet standards set forth in the Niagara Supplier Code of Conduct regarding slavery and trafficking. Any supplier who fails to meet these standards regarding slavery and trafficked labor will be subject to remedial action, up to and including termination of the business relationship.

Niagara is in the process of implementing a training program for employees who have direct responsibility for sourcing suppliers of materials originating outside of the United States. Training will include identifying signs of slavery and human trafficking, and mitigating risks in our supply chain. Any Niagara employee with knowledge of slavery or trafficked labor at Niagara or within a supplier's organization is expected to report such information to the direct supervisor or to the anonymous Niagara Ethics Hotline.