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Whole Foods Market's Disclosure under the California Transparency in Supply Chains Act of 2010

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Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 requires retailers and manufacturers doing business in California to disclose efforts to eradicate slavery and human trafficking from its direct supply chain. The following is Whole Foods Market's required disclosure under the Act:

1. Risk Assessments. Whole Foods Market performs a preliminary risk assessment of suppliers of its 365 Everyday Value Products to determine the level of risk associated with slavery and human trafficking in their supply chains. In addition, Whole Foods Market selectively brands products with its Whole Trade Guarantee mark that have been audited by third parties for compliance with standards regarding wages and working conditions.
2. Auditing. Whole Foods Market performs extensive internal audits of all 365 Everyday Value Product suppliers that include both food safety and elements of social responsibility. Whole Foods Market requires high risk suppliers of those products to provide Whole Foods Market with independent announced third party audits specific to social accountability, including slavery and human trafficking.
3. Certification Requirements. Whole Foods Market is in the process of requiring all its direct suppliers to certify that they and the producers of goods and materials used by them in products they sell to Whole Foods Market comply with Whole Foods Market's standards with respect to slavery and human trafficking. The Whole Foods Market standards include a requirement to comply with the laws regarding slavery and human trafficking in the countries in which suppliers are doing business.
4. Internal Accountability. Whole Foods Market is committed to ethical and socially responsible conduct in the workplace. All of its employees and contractors must adhere to its Code of Business Conduct, which requires compliance with all laws, including laws addressing slavery and human trafficking. Violations of the Code of Business Conduct by employees may result in disciplinary action up to discharge. Violations by contractors may result in their dismissal.
5. Procurement Training. Whole Foods Market's training program teaches its team members responsible for supply chain management the principles underlining its standards relating to slavery and human trafficking and provides education on how to identify and respond to supply chain issues, such as slavery and human trafficking.