

Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657, which adds to California Civil Code Section 1714.43) will require retailers doing business in the State of California to provide information regarding their efforts to eradicate slavery and human trafficking in their supply chains. Vintners Distributors does not believe there is an appreciable risk of human trafficking or slavery corrupting our direct supply chain, which is located within the United States.

1. **Verification.** Vintners Distributors does not conduct the verification actions described in Section 1714.43(c)(1) of the Civil Code.
2. **Audits.** Vintners Distributors does not conduct supplier audits as described in Section 1714.43(c)(2) of the Civil Code.
3. **Certification.** Vintners Distributors does not require direct suppliers certification as described in Section 1714.43(c)(3) of the Civil Code.
4. **Internal Accountability.** Vintners Distributors does not maintain internal accountability standards for human trafficking as described in Section 1714.43(c)(4) of the Civil Code.
5. **Training.** Vintners Distributors does not provide the specific management training as described in Section 1714.43(c)(5) of the Civil Code.