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## **Wells Enterprises, Inc. Position on Slavery and Human Trafficking**

Wells Enterprises, Inc. (“Wells”) strongly opposes slavery and human trafficking. Accordingly, Wells solicits its active direct suppliers to provide certification that all of the materials incorporated into each product supplied to Wells comply with the laws regarding slavery and human trafficking of the country(s) where they do business. Supplier certifications are requested during on-boarding of new suppliers. Wells verifies the suppliers’ certifications during announced Supplier Quality Management Audits conducted by Wells (not a third party), based on a risk-based assessment schedule developed by Wells each year.

Wells maintains internal accountability for employees through its Code of Conduct, which is guided by Wells’ core values of honesty, respect, integrity, discretion, humility, and accountability. It is the strict policy of Wells to comply with all federal, state, and local laws, rules, and regulations. If an employee becomes aware or reasonably suspects any violation of laws, rules, or regulations, it is his or her duty to report the potential violation to his or her supervisor.

Wells employees and management, who have direct responsibility for supply chain management, shall be provided training on slavery and human trafficking, particularly with respect to mitigating risks within the supply chains of products, during employee orientation and thereafter on a bi-annual basis, commencing in January, 2012.

