

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

Overhill Farms, Inc. is committed to improving our communities, respecting human rights, and acting with integrity and accountability while serving the needs of our customers and shareholders. These commitments are embodied in our Code of Ethics and Conduct, which provides information about how we conduct our day-to-day business activities. The Code is required reading for all directors and employees. Failure by employees to comply with company policies and procedures may result in disciplinary action up to and including termination of employment.

To that end, Overhill Farms expects its suppliers and supply chain partners to reflect these same values. Our relationships with our suppliers are based on lawful and equitable practices. We expect our suppliers to obey the laws that require them to treat their workers in a fair manner and to provide these workers with a healthy and safe work environment.

The California Transparency in Supply Chains Act of 2010 (SB-657) requires retail sellers and manufacturers doing business in California to disclose their efforts to eradicate slavery and human trafficking in their direct supply chain. To address the requirements of this Act, Overhill Farms' discloses the following:

At this time, Overhill Farms does not (1) engage in verification of product supply chains to determine and address risks of human trafficking and slavery; (2) conduct audits of suppliers to determine supplier compliance with company standards for human trafficking and slavery in supply chains; (3) require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country in which they are doing business; (4) maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking; or (5) provide company employees and management who have direct responsibility for supply chain management with training on human trafficking and slavery. However, Overhill Farms management is in the process of determining to what extent, if any, it can practicably implement programs to help ensure that the Company's suppliers reflect its values regarding human rights, obey the laws that require them to treat their workers in a fair manner, and provide their workers with a healthy and safe work environment.