



Nissin Foods Disclosure in Compliance with California Transparency in Supply Chains Act (SB657)

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) will go into effect in the State of California. This law was designed to increase the amount of information made available by manufacturers and retailers regarding their efforts (if any) to address the issue of slavery and human trafficking, thereby allowing consumers to make better, more informed choices regarding the products they buy and the companies they choose to support. Slavery and human trafficking can take many forms, including bonded or forced involuntary labor and child labor. Nissin Foods (USA) Co., Inc. (Nissin) prohibits any form of slavery and/or human trafficking throughout the supply chain. Specifically, we have implemented the following action steps to address the issue of slavery and human trafficking:

Verification:

Nissin has sent letters to all its suppliers informing them of the implementation of SB 657 and requesting them to review their compliance procedures and complete a questionnaire regarding their efforts to combat human trafficking and slavery in their own supply chains. We further require our Suppliers to certify that all materials incorporated into products supplied to Nissin comply with the laws regarding slavery and human trafficking of the country or countries in which the Supplier is doing business.

Auditing:

Nissin Foods USA has adopted a stringent Supplier Code of Conduct ("Code") that sets out specific standards and requirements for any Supplier doing business with Nissin and is designed to protect workers in this country and abroad. Among other things, the Code requires our Suppliers to allow unannounced factory inspections for contractual compliance, as well as for compliance with laws and regulations dealing with child or forced labor and unsafe working conditions. Nissin will not tolerate the involvement of its suppliers in human trafficking and slavery. We will make unannounced factory inspections (either directly or through a third party) and quickly investigate any reports alleging human trafficking and slavery in the supply chain. We will take swift and decisive action against any supplier that is found to have acted improperly in this regard.

Certification:

Nissin has purchasing agreements in place with all its direct suppliers requiring them to comply with all applicable laws and regulations regarding forced labor and child labor including International Labour Organization Convention 29 Concerning Forced or Compulsory Labour and Convention 105 Concerning the Abolition of Forced Labour. Through signing Nissin's purchasing agreement, suppliers also agree to comply with the obligations stated in Nissin's Supplier Code of Conduct. Lastly, our direct suppliers must certify that all materials incorporated into products supplied to Nissin comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Internal Accountability:

We require all Nissin employees to comply with our Business Ethics and Conflict of Interest Policy as well as our non-harassment and anti-discrimination policies. Suppliers, contractors and service providers as well are expected to act ethically and abide by our Business Ethics and Conflict of Interest Policy. As with other alleged violations of company policy, we will investigate the issue and take the appropriate action up to and including termination for employees and termination of agreements for suppliers and contractors.

Training:

Beginning January 1, 2012, we plan to include training on slavery and human trafficking in all of our employee ethics training. This training will teach employees responsible for supply chain management how to identify and respond to supply chain issues, such as forced labor or child labor.