



Ralcorp Holdings, Inc.'s Disclosure under the California Transparency in Supply Chains Act of 2010

December 31, 2011

The California Transparency in Supply Chains Act of 2010 (SB 657) (the "Act") requires retailers and manufacturers doing business in California to disclose their efforts to eradicate forced labor and human trafficking from their direct supply chain to tangible goods offered for sale. To that end, the following is Ralcorp Holdings, Inc.'s disclosure under the Act on behalf of itself, its subsidiaries and its affiliates (collectively "Ralcorp").

In order to be considered for Ralcorp's direct supply chain, vendors are expected to operate in a manner that respects the rights of people and to act by Ralcorp's Supplier Code of Conduct. This Code of Conduct requires that vendors to Ralcorp not engage in any labor practices that violate the laws and regulations of the country where the products are manufactured or obtained and not engage in any unsanitary or unsafe labor conditions. Vendors are on notice that Ralcorp has the right to periodically audit their facilities to ensure compliance with Ralcorp's standards. Further, Ralcorp does not purchase any of the products from countries listed in the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor issued on September 30, 2011.

In 2011, Ralcorp issued correspondence to all of the members of its direct supply chain informing them of the requirements of the Act. This correspondence required written confirmation that the member was not utilizing forced labor or human trafficking to source, produce or manufacture any product supplied to Ralcorp. Beginning in 2012, Ralcorp will require any vendor that seeks to become a member of Ralcorp's direct supply chain to similarly verify that neither forced labor nor human trafficking are utilized to source, produce or manufacture any product supplied to Ralcorp.

Ralcorp will be providing annual training to its employees responsible for procurement regarding the identification of forced labor and human trafficking issues as well as reminding these employees about the importance of this issue to Ralcorp and Ralcorp's policy against sourcing from vendors utilizing forced labor or human trafficking.

Ralcorp has learned over the years that improving compliance is an evolving and challenging process. However, Ralcorp will not hesitate to walk away from suppliers who do not share Ralcorp's commitment to providing an ethical and responsible work environment.