	PREVENTION & REMEDIATION OF FORCED LABOUR AND CHILD LABOUR POLICY		
	Approved by:	**Carol Bendo – Director of Human Resources**	
	Document Number	Effective Date	Document Type
	HRP-ALL-0024-R01	**January 1, 2025**	**Corporate**

Policy:

Mucci is committed to preventing, identifying and remediating forced labour and child labour through its organization, affiliates, and supply chain. Where the use of forced labour or child labour is found to exist, our aim is to place the interests of the individual at the center of our response and assist the individual to be free from exploitation and focus on their best interests.

Mucci sources supplies and products from several countries, including some which may pose a risk of child labour. While we specifically prohibit forced labour and child labour in our organization, we recognize that risks remain, and where found, must be addressed.

The scope of this policy includes workers who are permanent, temporary, under contract, agency workers, those that work from home, whether directly or indirectly employed by the management of the Company as well as individuals or children who have been forced into labour.

Definitions:

Child (worker)	A child who is not legally entitled to work i.e. below the minimum age of employment or under the age of 15 if this is higher.
Child Labour	A general term that includes the employment of a Child Worker or a situation where a Young Worker is exposed to Hazardous Work. Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Child Labour refers to one or more of the following: • Work done by a child who is under the minimum age of admission to employment for the type of work concerned. • Work that interferes with compulsory education. • Work that is likely to jeopardize a child's health, safety or morals (hazardous work).
Young Worker	Generally defined as a person between the age of minimum age of employment and 18 years.
Forced Labour **Modern Slavery**	Forced labour describes situations where the victim is either not free to stop working or not free to leave their place of work. Both are terms used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. These terms are only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. Modern slavery or forced labour as defined can include eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour
Remediation	Corrective measures are used to remove an individual from forced labour or child labour by providing alternatives and ensuring their safety and wellbeing. Action taken to improve, correct or stop damage.
Supply Chain	A supply chain is defined as a sequence of activities or parties that provide products or services to the organization.

Key Principles:

1. **Prevention**
    a. Apply responsible recruitment strategies.
    b. Provide leadership and employee training on how to recognize forced or child labour.
    c. Supply Chain commitment to socially responsible business management.
2. **Identify and Protect Victim**
    a. Verify the Child's Age and Work Conditions.
    b. Safely remove individuals from exploitative conditions.
    c. Ensure their immediate safety and prevent further harm.
3. **Assess Needs and Provide Support**
    a. Conduct professional assessments.
    b. Offer tailored support like education, healthcare, legal aid, and psychosocial services.
    c. A person/child should not be dismissed without a plan in place for what will happen to them.
4. **Engage Stakeholders**
    a. Plans should include the individual or the child's parents or guardian.
    b. Collaborate with NGOs, government agencies, community leaders, trusted professionals.
    c. Ensure culturally sensitive and locally appropriate solutions.
    d. and consultation from relevant local and trusted professionals, including the local government authorities and child protection agencies is encouraged.
5. **Deliver Remedies**
    a. Provide compensation (e.g. back pay).
    b. Facilitate access to education, vocational training, or alternative livelihoods.
6. **Monitor and Prevent Recurrence**
    a. Track remediation outcomes.
    b. Strengthening internal systems and supply chain oversight to prevent future cases.
7. **Document and Report**
    a. Maintain transparent records.
    b. Share progress with stakeholders and integrate lessons into policy and practice.

Prevention Strategies:

1. **Create and Ensure Responsible Recruitment Strategies**
    a. Clearly state minimum age for general work and hazardous or safety sensitive positions in job announcements and hiring policies.
    b. Apply a vetting process to third party or contract recruitment agencies to ensure company, customer and legislative standards are consistently adhered to.
    c. Use licensed recruiters, confirm licensing.
2. **Establish Consistent Hiring Processes**
    a. include a verification mechanism for age requirements and employment eligibility (i.e. photo ID, SIN/SSN, work permits, visas, conduct interviews in person when possible).
3. **Pre-Employment Documentation**
    a. Successful candidates are provided with employment agreements/contracts, information on job description, wages, payroll deductions (i.e. taxes, benefits, etc.), hours of work, conditions of employment and legislation governance prior to acceptance.
4. **Training**

a. Provide training to all employees on recognizing forced and child labour, worker rights, human rights, health and safety compliance, company policies and complaint/grievance mechanisms.

5. **Due Diligence**
    a. Create policies and procedures that identify risks, document violations, establish transparency and promote a culture of respect.
    b. Measure effectiveness of policies, processes and remediation strategies.

Supply Chain Requirements:

Companies that supply products or services to Mucci and wish to remain in good standing will be asked to agree to the Mucci Supplier Code of Conduct. Violation of this Code of Conduct can constitute a cause and reason for Mucci or its affiliates, to audit the supplier for compliance including all associated supply contracts.

The Mucci Supplier Code of Conduct is based on national laws and regulations as well as international conventions. We expect our suppliers to adhere to all relevant laws and regulations as well as to the requirements of standards. A summary is below for complete details please refer to the Mucci Supplier Code of Conduct.

1. Employment is freely chosen, commitment to no forced labour or child labour.
2. Employees are paid the wages for all hours worked.
3. Working conditions are safe.
4. Discrimination or harassment of employees is not tolerated. Retaliation is not permitted, and worker rights are protected.
5. Freedom of association.

Suppliers will be required to complete and submit a Forced Labour and Child Labour Supplier Questionnaire. The purpose is to provide transparency and to help identify instances of and mitigate the risk of forced labour or child labour between Mucci Farms and their supply chain.

Suppliers are required to monitor their organization and supply chains to prevent or minimize the risk of forced labour or child labour. Suppliers are to report any instance of forced labour or child labour and remediation taken to a Mucci Representative or Human Resources. Documentation may be requested to confirm remediation has taken place and preventative measures have been established.

Remediation Steps:

If an instance of forced labour, child labour or a youth engaged in hazardous work has been detected, Human Resources will initiate remediation. We have identified three (3) potential instances with steps to take.

Action Steps: Child Under 16 Found Working

1. Verify the Child's Age and Work Conditions
    a. Confirm the worker's age using government-issued ID.
    a. Identify the type of work and workplace setting.
    b. Check if the child is working during school hours.
2. Cease Working activity Immediately.
    a. Remove the child from the work environment and to a safe location.

   b. Ensure no further duties are assigned until the situation is resolved.
   c. Establish a report:
      Speak calmly, introduce yourself and ask open-ended, general questions.
      Assure them that they have done nothing wrong and are not "in trouble".
      Listen to the child to understand their needs.
      Offer an explanation as to why they can't work.
3. Notify Human Resources
   a. Advise senior leadership and legal counsel.
   b. Contact Family or Guardian
      i. HR will contact the child's parents/guardians and explain the situation.
      ii. Let the child know they will be paid for the hours they have worked and once they are legally able to work assure them that they are eligible to be rehired.
4. Create a plan of action
   a. Determine the type and level of response needed, stakeholders and social services if required.
   b. Let the individual know they will be paid for the hours they have worked.
5. Document
   a. Record all relevant details including age, job duties, schedule, and supervisor information
   b. Document remediate steps taken.
   c. HR documents and prepare reports for stakeholders.
6. Review
   a. Define Root Cause, review hiring process, policies and SOPs.
   b. Action deficiency findings.
   c. Retrain.

Action Steps: Young Worker (Between 16 and 18 years) Engaged in Hazardous Work

1. Verify the Youths' Age and Work Conditions
   a. Confirm the worker's age using government-issued ID.
   b. Identify the type of work and workplace setting.
2. Cease Working activity Immediately.
   a. Remove the youth from hazardous work and to a safe location.
   b. Ensure no further duties are assigned until the situation is resolved.
   c. Establish a report:
      i. Speak calmly, introduce yourself and ask open-ended, general questions.
      ii. Assure them that they have done nothing wrong and are not "in trouble".
      iii. Listen to the child to understand their needs.
      iv. Offer an explanation as to why they can't work in that role specifically.
3. Notify Human Resources
   a. Advise senior leadership and legal counsel. (if applicable).
   b. Contact Family or Guardian.
4. Create a plan of action
   a. Determine the type and level of response needed, stakeholders.
   b. Identify services needed. For example: safe accommodations, financial assistance, mental health, social services, law enforcement, legal counsel.
   c. Let the individual know they will be paid for the hours they have worked.
   d. Advise the individual, they will be monitored to ensure they have not returned to hazardous work.

5. Document
    a. Record all relevant details including age, job duties, schedule, and supervisor information
    b. Document remediate steps taken.
    c. HR documents and prepare reports for stakeholders.
6. Review
    a. Define Root Cause, review hiring process, policies and SOPs.
    b. Action deficiency findings.
    c. Retrain.

Action Steps: Individual Identified as Forced Labour

1. Verify the Individual's Identification and Work Conditions
    a. Confirm the worker's ID, using government-issued ID.
    b. Identify the type of work and workplace setting.
2. Cease Working activity Immediately.
    a. Remove the individual from work and to a safe location.
    b. Ensure no further duties are assigned until the situation is resolved.
    c. If required, provide medical assistance.
    d. Establish a report:
        i. Speak calmly, introduce yourself and ask open-ended, general questions.
        ii. Assure them that they have done nothing wrong and are not "in trouble".
        iii. Listen and seek to understand their needs.
3. Notify Human Resources
    a. Advise senior leadership and legal counsel.
    b. Canadian Human Trafficking Hotline: 1-833-900-1010
    c. Contact Law Enforcement if applicable.
    d. DO NOT promise confidentiality beyond your role
    e. Explain that you must report to protect them and comply with the law.
4. Create a plan of action
    a. Engage the individual in the next steps.
    b. Let the individual know they will be paid for the hours they have worked.
    c. Determine the type and level of response needed, stakeholders and social services if required.
    d. Identify services needed. For example: safe accommodations, financial assistance, mental health, social services, law enforcement, legal counsel.
    e. Assist in repatriation or return to home country or with reintegration services.
5. Document
    a. Record all relevant details including age, job duties, schedule, and supervisor information
    b. Document remediate steps taken.
    c. HR documents and prepare reports for stakeholders.
6. Review
    a. Define Root Cause, review hiring process, policies and SOPs.
    b. Action deficiency findings.
    c. Retrain.

References:

Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9
International Labour Organization, Fundamental Principles and Rights at Work Branch (FUNDAMENTALS), Geneva: ILO, 2020.

Related Policies:
HRP-ALL-0008-R02 Mucci Farms Human Rights Policy
HRP-ALL-0015-R01 Mucci Farms Open Door Feedback Policy
HRP-ALL-0023-R01 Mucci Farms Supplier Code of Conduct

Acknowledgement and Agreement:

I have read and understand the **FORCED LABOUR AND CHILD LABOUR REMEDIATION POLICY**. I agree to adhere to this policy and will ensure, if applicable, that employees working under my direction adhere to this policy. I understand that violating the rules/procedures outlined in this policy could lead to corrective action, up to and including termination of employment.

Employee Name

Employee Signature

Date