

## Child Labour, Remediation & Young Worker Policy

### John Mackle (Moy) Ltd (T/A Mackle Petfoods)

#### Introduction

John Mackle (Moy) Ltd (T/A Mackle Petfoods) has developed this policy as a declaration of its commitment and responsibilities for protecting Young Workers and ensuring compliance with the United Nations International Labour Organisation's Conventions (ILO) 138 and 182 relating to Child Labour and in accordance with the FSC Core Labour Requirements under the FSC-STD-40-004 Chain of Custody Certification.

At the outset, it should be noted that this policy applies to:

- All departments within Mackle Petfoods
- All our Suppliers as a condition of business. Suppliers are expected to demonstrate full compliance with this policy and accept their responsibilities under the remediation process. Suppliers are also required to monitor their own supply chains including labour providers.

For the operation of this policy the following definitions apply:

- **Child** - A "Child Worker" is defined as someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning full time work. The legal minimum age of work can vary depending on the country and so suppliers should seek guidance from national law.
- **Child Labour** – Is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their social, physical and mental development. This refers to work that is mentally, physically, socially or morally dangerous and harmful to children, and interferes with their schooling. i.e., depriving them of the opportunity to attend school, obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.
- **Hazardous Work** - Any work which, by its nature or the circumstances in which it is conducted, is likely to harm the health, safety or morals of Children or of which exposes children to sexual abuse. This includes working with chemicals, machinery or electrics; working in confined spaces, at height or in excessively hot or cold conditions; being exposed to dust, fumes or loud noise; lifting or carrying heavy loads; working overtime or working at night.
- **Young Worker** - A young person who is legally entitled to work i.e., above the minimum age of employment of 15 and below the age of 18.
- **Heavy Work (in the context of child labour)** – refers to work which is likely to be harmful or dangerous to children's health.
- **Worst forms of child labour:** comprises a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced labour, including forced or compulsory recruitment of children for use in armed conflict; b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performance; c) the use, procuring or offering of a child for illicit activities, in particular for production and trafficking of drugs as defined in the relevant international treaties; d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children (C182, Article 3).

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## Mackle Petfoods Policy Position

- We are committed to protecting the rights of Young Workers and remedying any instances of child labour.
- We will not engage in or condone the unlawful employment or exploitation of children in the workplace or the use of forced labour in our own operations or supply chain.
- No child is to be employed or engaged in the production of our products or the supply of materials or services to us.
- We shall prohibit the worst forms of child labour in the production of our products or the supply of materials or services to us.

Under the Management of Health and Safety at Work Regulations 1999 as an employer we must assess the risks to the health and safety of workers and any other persons who may be affected by their work activities.

The regulations also require that a specific risk assessment in relation to young workers is completed before a young person starts work. The risk assessment should take account of their inexperience; the layout of the workplace; any exposure to hazardous substances; the work equipment; the organisation of the processes and the extent of training to be given. Control measures must be present or introduced which eliminate or minimise any risks, as far as reasonably practicable.

There are certain types of work which young people should not be employed to do. We will not employ a young person for work:

- which is beyond their physical or psychological capability.
- involves exposure to harmful agents.
- involves harmful exposure to radiation.
- involving the risk of accidents which would not be recognised or avoided.
- involving risks from extreme cold / heat, noise or vibration.

We support the employment of Young Workers within the company and our supply chain if they do not perform hazardous or heavy work and there are adequate precautions in place for their protection. These precautions include: -

- Operating a robust procedure for age verification as part of the recruitment process to prevent the employment of child workers. This must be fully auditable based on documentary evidence.
- Undertaking a detailed risk assessment before employing a Young Worker to identify work that they can do safely.
- Providing appropriate training within approved national laws and regulations.
- Having sufficient management controls to ensure that the Young Worker follows safe systems of work and does not perform any form of hazardous work including working at night or overtime.
- We support formal work-based training or apprenticeship programmes that enable Young Workers to learn new skills. These programmes must be aimed at developing Young Workers' skills and experience and meet local legal requirements (where applicable) and subject to the above precautionary measures.
- Young Workers must be paid at least minimum wage for every hour worked including any training time.
- If a Young Worker is found to be performing hazardous work in our sites or in our supply chain the

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following action must be taken:

- Immediately remove the Young Worker from the task where the hazard is present.
- Continue to employ the Young Worker in an alternative role without any reduction in pay or benefits.

In countries where the national law or regulations permit employment of persons between the ages of 13 to 15 years in light work, Suppliers to Mackle Petfoods, should ensure such employment should not interfere with schooling nor be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours.

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## Child Labour and Remediation Process

- If it is suspected that an underage worker is employed at any of our sites or in the supply chain, then immediate steps should be taken to verify the age of the individual against official documentary evidence.
  
- If an underage worker/s is found working, it is necessary to:
  - Act quickly and appropriately by removing the worker from the work area to ensure their safety.
  - Record the names, ages and contact details of the workers concerned.
  - Explain the legal requirements and restrictions on working ages to the child clearly and conduct an age verification check.
  - Consult with child focused organisations (e.g., Child Protection Services) and local authorities regarding any child allegedly or confirmed to be involved in child labour.
  - Terminate the employment relationship.
  - Treat each situation of child labour on a case-by-case basis to ensure the best interest of the child considering their specific needs and aspiration when drawing up the remediation programme.
  
  - The programme is to include: -
    - Assisting them to find a school and support them financially through their education (vocational training or formal education).
    - Compensating the child's family for at least the wage they were earning. These wages will be paid monthly (not as a lump sum) until the child has reached the legal minimum age for working.
    - At the end of the period of education guaranteeing paid employment to the child worker at the same level in which they were previously employed if they wish to return.
    - Agreed monitoring period by Mackle Petfoods.
  
  - A full investigation should be conducted to identify how this has happened and action taken to prevent reoccurrence.
  
- In addition, there is an obligation on the following parties: -
  - **Mackle Petfood's designated contact** (See Appendix A) to notify immediately all relevant Customers where an underage worker has been found working at one of our sites or in our supply chain for their product.

The designated contact will also assume responsibility for the remediation process and will monitor the implementation and progress of the programme.
  
  - **The Supplier** is required to notify immediately the relevant Mackle Petfoods designated contact (See Appendix A) in the event of an underage worker being found working for them or a sub supplier.

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The Supplier is also required to fulfil its responsibilities for financially supporting a remediation programme (as outlined above) by working together with Mackle Petfoods to develop a responsible solution that is in the best interests of the Child, ensuring no financial detriment to the child, their dependents, and no breach to their human rights. Providing this happens then Mackle Petfoods will continue its business relationship with the Supplier.

### Further Action

- We will write to the Supplier and take formal action if they do not demonstrate cooperation with this Policy.
- We reserve the right to discontinue the business relationship with any Supplier if they deliberately breach this policy or fail to demonstrate action towards an agreed remediation programme.
- We will regularly review and audit our own recruitment procedures to ensure compliance and reserve the right to conduct audits of our supply chain.
- We will maintain an up-to-date self-assessment which describes how John Mackle (Moy) Ltd. T/A Mackle Petfoods applies the FSC Core Labour Requirements to our operations.
- This policy shall be reviewed annually and be made available to stakeholders, John Mackle (Moy) Ltd. (T/A Mackle Petfoods) workers, FSC accredited certification body and other interested parties as appropriate.

Signed on behalf of John Mackle (Moy) Ltd (T/A Mackle Petfoods)



John Mackle

**Managing Director**

John Mackle (Moy) Ltd (T/A Mackle Petfoods)

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### Appendix A

#### Designated Company Contact

|   | Designated Contact  |
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| John Mackle (Moy) Ltd (T/A Mackle Petfoods) | <b>Anne Brace</b><br><b>Human Resource Manager</b><br><br>40 Corrigan Hill Road<br><br>Moy<br>Dungannon<br>Co Tyrone<br>BT71 6SL<br><br>T: +44 (0) 28 8778 4641<br>M: +44 (0) 7736 966 990<br>E: <a href="mailto:anne.brace@macklepetfoods.com">anne.brace@macklepetfoods.com</a> |