

Child Labour, Remediation & Young Worker Policy

Introduction

John Mackle (Moy) Ltd (T/A Mackle Petfoods) affirms its commitment to protecting Young Workers and ensuring compliance with the United Nations International Labour Organisation's Conventions 138 and 182. This policy applies to:

- All departments within Mackle Petfoods
- All Suppliers, as a condition of business

Suppliers must monitor their own supply chains, including labour providers, and demonstrate full compliance with this policy. Suppliers are required to engage fully in remediation processes and support long-term solutions for affected children and their families.

This policy forms part of Mackle Petfoods' human rights and ethical trade framework and should be read in conjunction with:

- Human Rights Policy
- Modern Slavery Statement
- Supplier Code of Conduct

This policy sets out Mackle Petfoods' approach to remediation and supports our commitment to identifying, addressing, and preventing child labour and wider human rights risks.

Definitions

- **Child:** A person under 15 years of age or the minimum age defined by local law.
- **Child Labour:** Work that deprives children of their childhood, potential, dignity, and is harmful to their development.
- **Hazardous Work:** Work likely to harm health, safety, or morals, including exposure to chemicals, machinery, confined spaces, extreme temperatures, dust, fumes, noise, heavy lifting, night work, or overtime.
- **Young Worker:** A person aged 15 to 17 who is legally entitled to work.
- **Heavy Work:** Work harmful or dangerous to children's health.
- **Worst Forms of Child Labour:** Includes slavery, trafficking, forced labour, prostitution, pornography, illicit activities, and work harmful to health or morals (ILO C182, Article 3).

Policy Position

Child labour is recognised as a form of modern slavery risk, and this policy supports the commitments outlined in our Modern Slavery Statement.

- We are committed to protecting the rights of Young Workers and remedying any instances of child labour.

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- 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.

Risk Assessment

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.

A specific risk assessment must be completed before employing a Young Worker which should include:

- Take into account their inexperience
- The layout of the workplace
- The extent of the training given
- Control measures must be present or introduced which eliminate or minimise any risks, as far as reasonably practicable.
- Young Workers must not be employed in work:
 - Beyond their physical or psychological capability
 - Involving harmful agents or radiation
 - With accident risks not easily recognised
 - In extreme cold/heat, noise, or vibration

Young Worker Protection

We support the employment of Young Workers in our 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:

- Robust age verification procedures during recruitment process
- Detailed risk assessments
- Appropriate training and supervision
- Prohibition of hazardous work, night work, and overtime

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- Participation in formal training or apprenticeship programmes to learn new skills. These programmes are aimed at developing Young workers' skills and experience and meet local legal requirements (where applicable) and subject to the above precautionary measures.
- Payment of at least minimum wage for all hours worked, including training
- Mentorship or buddy systems to support development

If a Young Worker is found performing hazardous work:

- Remove them immediately from the task
- Reassign to a safe role without loss of 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 does 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.

Child Labour Remediation Process

This procedure forms part of Mackle Petfoods' overall remediation framework and may be applied, where relevant, to other human rights issues identified within our operations or supply chain.

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:

1. Verify age using official documents
2. Remove the child from the work area
3. Record details and explain legal restrictions
4. Consult child protection organisations and local authorities
5. Remove the child from employment in a manner that prioritises their safety and wellbeing while ensuring no financial harm
6. 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.

Develop a remediation programme:

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- 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.

Obligations

- **Mackle Petfoods Contact:** The Head of HR must notify relevant stakeholders, including customers where appropriate, and oversee the remediation process
- **Supplier:** Must notify Mackle Petfoods Head of HR and co-develop the remediation programme, ensuring no financial detriment to the child or dependents

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.

Mackle Petfoods is committed to ensuring that remediation outcomes are sustainable and in the best interests of the child, with ongoing monitoring where appropriate.

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



Philip Hamilton

Operations Director

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

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