



Introduction

Child Labour Remediation and Young Worker Policy

Community Foods 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.

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

- All Community Production and Operational Facilities in the UK
- 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, through the platform SEDEX where it is a requirement to be a B member as a condition of supply into Community Foods.

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 suppliers should seek guidance from their 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 work.
- **Hazardous Work** - Any 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. This includes working with chemicals, machinery, or electrics; working in confined spaces, at height or in excessively hot/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.

Community Foods 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.

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- No child is to be employed or engaged in the production of our products or the supply of material 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, so 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 chemicals.
- 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 at Community Foods and our supply chain provided that they do not perform hazardous 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.
 - 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 any overtime
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- We support formal work-based training or apprenticeship programs that enable Young Workers to learn new skills. These programs 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 will 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 the 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.

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 must 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 carry out 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 program.
 - The program 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 Community Foods Ltd.
 - A full investigation should be carried out to identify how this has happened and action taken to prevent reoccurrence.
- In addition, there is an obligation on the following parties: -
 - **Community Foods Ltd designated contact** to notify immediately all relevant Customers where an underage worker has been found working at one of our sites or in our supply

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chain for their product.

The designated contact will also assume responsibility for the remediation process and will monitor the implementation and progress of the program.

- **The Supplier** is required to notify immediately the relevant Community Food Ltd designated contact (Technical Director) in the event of an underage worker being found working for them or a sub supplier.

The Supplier is also required to fulfil its responsibilities for financially supporting a remediation program (as outlined above) by working together with Community Foods 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 Community Foods will continue its business relationship with the Supplier.

Signed on behalf of Community Foods Ltd

Name: J Chambers

Position: -Technical Director 10/2/2022



Appendix A

Community Foods Ltd: Child Labour, Remediation & Young Worker Policy compliance confirmation.

Company Name:

We acknowledge receipt of the following document:

- Community Foods Ltd: Child Labour, Remediation & Young Worker Policy Version Number 1.0 (Dated: 5.8.2021)

We hereby confirm that we have read, understand, and agree to comply with the above policy and that we fully understand Community Foods Ltd commitment to protecting the rights of Young Workers and the prevention of Child labour and our own obligations as a supplier to Community Foods Ltd.

In addition, we agree, if requested, to the verification of compliance by appointed representative from Community Foods Ltd.

Signed by:

Name (Print):

Date:

Company Stamp:

Community Foods Child Labour acknowledgement