UPHOLDING HUMAN RIGHTS IN OUR SUPPLY CHAINS: SUPPLIER PARTNER REQUIREMENTS









Supplier partner responsibility

Supplier partner Supplier partner requirements: requirements: migrant workplace equality

workers

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OUR COMMITMENT AND RESPONSIBILITY



"Continuous improvement towards best practice ethical trade and sustainable sourcing is at the heart of how we do business".

Continuous improvement towards best practice ethical trade and sustainable sourcing is at the heart of how we do business. The World Wise Foods Group is committed to ensuring that all workers in our supply chains are treated with dignity, and that their human rights are respected.

The World Wise Foods Group fully supports the UN Guiding Principles on Business and Human Rights¹ and we take seriously our responsibility to prevent and mitigate human rights abuses. If incidents occur we will support supplier partners to deliver remedy to workers

The World Wise Foods Group is ambitious, we aim to continue to lead the way on responsible sourcing and to support our supplier partners to engage and respond to its challenges and complexities. This ambition is driven by my personal commitment to ensuring that the success of the World Wise Foods Group is built on conscious choices to do business in a way that has a positive long term social, economic and environmental impact.

This document seeks to outline our expectations of supplier partners with regards to human rights. We expect our supplier partners to adopt this policy or develop their own policy reflecting the requirements outlined in this document. The approach we take to ensure compliance to this policy can be found in our Responsible Sourcing Code of Practice.

Supplier partner

John Burton, World Wise Foods Group Chairman and Chief Executive

If you require any further information, please contact: ethicaltrade@worldwisefoods.co.uk

John Burton, Chairman & Chief Executive

1 Translations of the UN Guiding Principles on Business and Human Rights can be found here, they are also explained in this short video.

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HUMAN RIGHTS IN OUR SUPPLY CHAINS

The World Wise Foods Group recognises that economic globalisation has resulted in more complex supply chains and that this complexity makes it challenging to both identify, and influence human rights practices. These dynamics make some workers significantly more vulnerable to exploitation than others. The World Wise Foods Group has identified the three most vulnerable groups of workers within our supply chains as:

- Migrant workers: There are now significantly more migrant workers than ever before; increasing numbers of workers are seeking opportunities to earn and send remittances home and there has also been increased demand in host countries for low skilled labour. Migrant workers make a significant contribution to the World Wise Foods Group's success.
- Women: Alongside migrant workers, we recognise that women are also vulnerable within our supply chains and need additional provisions to ensure their rights are considered and met.

• Child labour and young workers: Although 18 is the expected minimum employment age for our supplier partners, we recognise the potential that young workers could be employed and that they are inherently vulnerable: the ILO defines young workers as between the age of 18-24. There is also the potential risk of child labour in agriculture which is the primary source of all our ingredients.

This policy focuses on ensuring all workers are treated equally in the workplace and outlines the extra provisions required to ensure the human rights of these vulnerable groups are met.

While this policy focuses specifically on people in our supply chains, we also recognise the connection between human rights, responsible sourcing of ingredients, and protecting the environment.





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SUPPLIER PARTNER RESPONSIBILITY: INTRODUCTION



The World Wise Foods Group expects supplier partners to protect and uphold human rights as outlined in this document and as prescribed in local and international law. If abuses occur we expect supplier partners to protect workers from reprisals throughout the investigation process, and to provide remedy as determined by this process. The World Wise Foods Group will always support supplier partners who are honest and transparent about their operations and who are committed to implementing shared action plans.

The World Wise Foods Group expects our supplier partners to comply with the audit expectations of our retail customers, as well as actively engaging with our Ethical Trade team and implementing any ethical action plans that result. Supplier partners should expect a high level of engagement from the World Wise Foods Group if they are operating in high risk countries² and/or employ vulnerable workers.

As a food company our products have multiple ingredients from multiple sources; our ability to identify and improve human rights in our supply chains beyond tier one³ is rooted in our relationships with our supplier partners and their onward implementation of our approach further down the supply chain. We expect our supplier partners to share our, or their, human rights policy with their suppliers, and to engage in ethical supply chain focused initiatives with the World Wise Foods Group.

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2 The World Wise Foods Group is part of the Food Network for Ethical Trade, a group of suppliers and retailers which aims to address human rights risks in global food supply chains through a common approach. We use the FNET risk rating tool to determine high risk countries in our supply chains. These currently include Thailand, China, Philippines, Indonesia, India, Malaysia, Swaziland and Morocco. 3 Tier one are suppliers the World Wise Foods Group purchases products from directly.

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SUPPLIER PARTNER RESPONSIBILITY: MINIMUM STANDARDS

The World Wise Foods Group expects all supplier partners to meet minimum labour standards. The expectation is that they will be:

- compliant with local laws
- actively engaged in continuous improvement towards the Ethical Trade Initiative (ETI) Base Code which is recognised by our retail customers
- committed to becoming a responsible, responsive employer

The approach we take to ensuring these expectations are met by supplier partners can be found in the World Wise Foods Group Responsible Sourcing Code of Practice.

Where ETI base code and local law do not align we expect supplier partners to follow whichever makes the best provision for workers' needs in the local context.

THE ETI BASE CODE

1. Employment is freely chosen.

2. Freedom of association and the right to collective bargaining are respected.

- 3. Working conditions are safe and
- 4. Child labour shall not be used.
- 5. Living wage shall be paid.
- 7. No discrimination is practised.
- 8. Regular employment is provided.
- 9. No harsh treatment of workers is



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SUPPLIER PARTNER RESPONSIBILITY: RESPONSIBLE, RESPONSIVE EMPLOYERS

Engaged, productive workers are the foundation of every successful business. The World Wise Foods Group believe that all workers not only want fair reward and a good quality of life, but that they also want the opportunity to fulfil their aims and ambitions. Equally, it is the leadership in any business that determines working culture; how a business thinks about its workers shapes and informs how every worker is treated.

When companies bring large numbers of workers together, including migrant workers who can be perceived as outsiders, there is dangerous potential for the dehumanisation of workers; management can start to see workers as production units rather than as people. Dehumanisation results in workers accepting poor treatment and reduces the likelihood they will report abuses. For those in authority de-humanisation is a form of moral disengagement; behaviours that we all know are unethical and unfair become accepted and rationalised.

The World Wise Foods Group expects its supplier partners to go beyond meeting minimum standards. It is our ambition that all our supplier partners will be responsible employers; they will go above and beyond to ensure that their working culture is founded on dignity and respect for all employees. Being a responsible employer goes beyond ensuring the rights of workers; it includes establishing ethical behaviours across the business, appreciating and recognising workers contribution to the workplace and actively supporting the integration of vulnerable workers in the workplace and wider community.

The antidote to de-humanisation is meaningful, responsive engagement between all levels of management and workers. The World Wise Foods Group recognises that workers are the most legitimate defenders of their own rights. All supplier partners must have clear grievance mechanisms in place that are accessible and trusted by workers. The World Wise Foods Group accepts and recognise the universal right to collective bargaining and, in the absence of unions, we expect all our supplier partners to have an active, engaged worker committee.

The World Wise Foods Group also encourages supplier partners to invest in pro-actively seeking feedback from workers; through direct access to Human Resources, worker committees, worker satisfaction surveys and employee hotlines, workers can play a critical role in driving workplace improvements that increase employee satisfaction and retention.





SUPPLIER PARTNER REQUIREMENTS: WORKPLACE EQUALITY

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SUPPLIER PARTNER REQUIREMENTS: WORKPLACE EQUALITY

The World Wise Foods Group believes that the equal treatment of all workers regardless of age, gender, religion, caste or nationality is the essential foundation of ethical employment practices.

In order to secure equality in the workplace we expect our supplier partners to comply with the following practices. Where non-compliances are found, remedy must be provided to workers.

A. RECRUITMENT

 The age of applicants must be checked.
 Employment of underage workers is prohibited.
 A remediation process must be in place where under age workers are recruited.

2. Employers must ensure workers have a clear understanding of the site, role, performance requirements, skills, terms, conditions, pay and benefits before they agree to employment. World Wise Foods supports the principles of responsible recruitment. 3. Responsible recruitment processes must be in place. Recruitment must respect the <u>Employer</u> <u>Pays Principle</u>. Fees and costs related to recruitment, and ongoing employment, should be covered by the employer (as per <u>ILO definition</u> of fees and costs). The recruitment process must have integrity; the job offered should be the job provided. Applicants should be treated with respect throughout the recruitment process: employers must ensure there is no harsh or unfair treatment of applicants.

4. No worker should pay for a job (see migrant worker requirements for full details).

B. ORIENTATION AND TRAINING

1. It is the responsibility of employers to ensure workers have a clear understanding of their rights and employment arrangements.

2. All workers must receive adequate orientation and an employee handbook which covers legal rights and obligations, employment terms, pay, benefits, employer rules and regulations, disciplinary systems, how workers can communicate with management (worker voice) and grievance procedures. 3. Training must take place before work commences and the cost of training, including workers time, must be covered by the employer.

C. EMPLOYMENT TERMS

1. All workers must have a written contract of employment in their own language before work commences. Ideally employees should be contracted directly and not through recruitment agents, sub-contractors or labour providers. The only exception to this is ad hoc temporary staff; employers must have a formal procedure for moving these staff to direct employment should their working pattern become regular. Short term contracts must not be used as a mechanism to avoid social security, pay or benefits obligations.

2. Where workers are not employed directly – such as through recruitment agents, subcontractors or other labour providers - it is the supplier partners responsibility to ensure the employer is meeting legal, contractual and best practice employment standards. It is also the supplier partners responsibility to ensure workers linked to labour providers do not pay recruitment fees or costs. This should be verified through regular internal auditing, regularity should reflect the level of risk. Where labour providers do not deliver required employment standards it is the supplier partners responsibility to ensure remedy is secured for workers. Supplier partners are encouraged to outline clear terms in Service Level Agreements (SLAs) including actions that will lead to termination of contracts with labour providers. This should be verified through regular internal auditing (note: some customers may request external audits of labour providers).

3. Contract terms and conditions, including pay and benefits, must be the same for all workers starting in the same roles, regardless of age, gender, religion, caste, nationality or in/direct employment status.

4. Contracts must outline terms and conditions that regulate the relationship between the worker and the employer. Worker Handbooks must outline company practices. Where local law determines the content of contracts the following must be included between the contract and the handbook;

• Description of work, employer address and work location, length of contract and

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renewal conditions, probation period and terms, regular hours, permitted breaks, gross/net rate pay, pay schedule, overtime wage rates, legal wage deductions, legally allowed overtime, notice periods and grounds for contract termination

- Any benefits including medical coverage, holiday pay, sick pay, bonus schemes, annual leave and public holidays, transport, accommodation and meal provision
- Any disciplinary procedures. Pay deductions and fines must not be used as disciplinary measures.

5. Employers must not retain workers' identity documents. A document retention policy must be signed by workers explaining the process when identity documents are required by the employer for permit processing. All workers must be offered safe, lockable storage for their documents. Updated contracts must be re-signed by workers.

6. Changes to contracts, even when required by law, must only be made after adequate explanation.

7. All workers must have equal opportunity for promotion and career progression.

D. WORKING HOURS

1. Overtime must be voluntary in principle and practice. Overtime must be specified as voluntary in workers contracts. It is the responsibility of the supplier partner to ensure any sub-contractors or labour agencies comply to their working hours policy. In order to ensure supplier partners policy of no forced overtime (in principle and practice) there must be a process for approving, accepting or refusing overtime. The process must ensure overtime is allocated fairly. All relevant staff must be trained in the policy.

2. Employers should have a system in place that can verify working hours for each worker - standard hours, overtime hours and total hours worked. A system should be in place that identifies when working hours are going to exceed the legal limit and which ensures workers receive rest days as below.

3. Employers are expected to comply with local law on working hours and overtime. Where legal working hours are higher than ETI base code (60hrs/week), additional safeguards must be in place to ensure rest days are observed (1 day off in 7, or 2 days off in 14) and connections between long working hours and accident rates, production efficiency and product quality must all be closely monitored.

E. PAY

1. All workers must at least receive the locally defined minimum wage, holiday pay and sick pay as defined by local law. Overtime should be paid at a minimum of 125% as defined in the ETI base code, or as per local law where this is higher. Employers must be aware of and working towards meeting living wage/income levels.

2. Wages must be paid regularly and on time. Wages must go into the workers bank account of choice and the account must be in their name. No payments should be made via third parties. Delayed or withheld payments are prohibited.

3. No deductions other than those required by national law must be made from worker's payments. Any legal deductions must be outlined clearly in contracts and payslips. Forced savings schemes are prohibited. Performance issues must be managed through disciplinary procedures, not through pay deductions. Where pay deductions as disciplinary are allowed under local law it must be outlined in workers contracts and there must be a transparent process for implementation. Pay deductions must not reduce the workers salary below minimum wage for that pay period.

4. All workers must receive a detailed payslip listing all payments including overtime payments and legitimate deductions. If providing payslips

in workers own language is not possible, employers must display translations of payslips for workers. It is the responsibility of employers to ensure workers understand their payslip.

F. BENEFITS

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1. Employers must pay for any Personal Protection Equipment (PPE) or uniforms required for workers to fulfil their job requirements. Replacements must be available within a reasonable timeframe. Where replacements are not made available in this timeframe there must be a process for reimbursing workers for PPE purchased.

2. Access to healthcare must be provided for all workers.

3. Workers must have access to injury compensation in cases of injury.

4. Workers must have the freedom to choose to live in private accommodation or accommodation provided by employers (where available). Workers freedom of movement must not be restricted.

5. All accommodation provided by employers must be safe, clean and hygienic, with potable running water and adequate sanitary facilities. Secure lockers must be provided for storage of personal items. Buildings must comply with

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building regulations and multiple occupancy regulations.

6. Where employers offer accommodation, or facilitate access to accommodation, they are responsible for regularly checking that living conditions meet required standards.

7. Employers must ensure workers have access to safe transport between the workplace and their accommodation, particularly after dark. Organised transport must be frequent enough so that it does not negatively impact personal time.

8. Employers must enable access to food that complies with religious requirements either through provision on site or allowing workers to bring food onto site.

9. Employers must provide or facilitate access to social and leisure activities for workers who live on site.

G. WORKER REPRESENTATION

1. Where allowed by national law all workers must have the right to choose whether to form or join trade unions and to bargain collectively.

2. Where unions are prohibited by law, or are not available, employers must ensure

democratic representation of workers through a freely elected worker committee. Suppliers are responsible for ensuring that vulnerable workers such as women or migrant workers are effectively represented. Worker committee meeting minutes must be displayed where all workers can read them in accessible languages. Members of the worker committee must be made visible to all employees through their names, or photos being displayed on an accessible notice board

3. Employers must be able to demonstrate worker committees are representative, active and contributing to site improvements.

4. There must be no penalty, or threat attached to worker organisation.

H. HEALTH AND SAFETY

1. Workplaces must be safe and hygienic, and workers must receive adequate health and safety training for their specific roles before they start work.

2. It is the responsibility of employers to ensure workers understand their health and safety rights and responsibilities.

3. Employers must include worker engagement in health and safety monitoring through

establishing clear communication channels and by including workers in the membership of an active health and safety committee.

I. WORKER PROTECTION AND **GRIEVANCE PROCEDURES**

1 All workers must work free from harassment: the use of violence, threat or intimidation of any kind is strictly prohibited. Sexual harassment of workers in any form is unacceptable and complaints must be addressed sensitively and confidentially. All worker harassment must be regarded as a serious disciplinary offence.

2. Employers must respect worker's religious practice, make appropriate facilities available for religious observance and enable access to places of worship for men and women.

3. Employers will ideally offer a number of confidential communication channels for workers to raise complaints or concerns. With the exception of sensitive issues, employers must have a system in place that shares with workers, for example through the worker committee, the employer's response to all the issues raised through the different communication channels available. The more workers hear their employer responds to their concerns, the more they will communicate. Within any

communication by the employer on issues raised by workers, it is essential that worker's confidentiality and anonymity is respected.

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4. All workers must have access to credible arievance mechanisms, without fear of financial penalty, intimidation, recrimination or dismissal.

5. When grievances have occurred, all workers must have access to remedy, including appropriate compensation. All workers must have access to judicial remedy.

J. END OF EMPLOYMENT

1. All workers must be able to terminate their employment with reasonable notice (as specified in their contract) without penalty.

2. Freedom to change employment must be respected and legal requirements followed.

3. At the end of a contract all workers must be paid outstanding wages and any other benefits or savings accrued in full before they leave.

4. Workers must not face dismissal for any medical reason that does not impede their ability to do their job (e.g. HIV status). Where dismissal is required by law, appropriate remediation must be made to the workers



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SUPPLIER PARTNER REQUIREMENTS: MIGRANT WORKERS

Migrant workers make a significant contribution to the economies of their host countries and home countries through remittances; migrant workers directly contribute to the success of The World Wise Foods Group.

We recognise that migrant workers are a vulnerable group within our supply chains; language barriers can affect how well contractual rights, obligations and training are understood

Migrant workers may not be aware of local legislation, cultural norms and practices. Workers who arrive through recruitment channels where fees have created indebtedness are particularly vulnerable to bonded labour and exploitation; staying in paid employment can be prioritised over speaking up about harassment, discrimination or unacceptable living conditions.

The World Wise Foods Group supports the Dhaka Principles⁴ for migration with dignity.



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The World Wise Foods Group believes in worker equality. To ensure this for migrant workers extra provisions are needed. As well as complying with the practices outlined under Workplace Equality in this policy, we expect our supplier partners to comply with the following practices. Where noncompliances are found, remedy must be provided to workers.

A. RECRUITMENT

World Wise Foods supports the principle of responsible recruitment: the recruitment process must have integrity, the job offered should be the job provided.

1. Migrant workers under the age of 18 must not be recruited. The employment of underage workers is prohibited. Employers must check the age of applicants and have a remediation process for instances where under age workers are recruited.

2. Where possible employers must recruit migrant workers directly. Where this is not possible recruitment agencies must be legally registered and audited.

3. Employers must ensure workers have a clear understanding of the site, role, performance requirements, skills, terms, conditions, pay

and benefits before applicants agree to employment.

4. All successful applicants must receive pre-departure training in their own language which includes contract details, documentation, information on the host country, specifics on the job role, conditions of work, pay, benefits, skills, performance required and access to complaint mechanisms after arrival. If the supplier partner is not conducting training themselves, they must provide information to the recruitment agent. Pregnancy testing must not be conducted unless it is required by local law.

5. Employers must have a policy which prohibits charging migrant workers for recruitment, placement and repatriation costs. This policy position must be shared with applicants during the recruitment process.

6. Employers must have a policy which prohibits harsh or unfair treatment throughout the recruitment process, acceptance of any form of bribe from workers to secure employment, or recruitment agencies to secure employment contracts; these actions by an employee must be considered a serious disciplinary offence.

7. Recruitment processes must respect the Employer Pays Principle. Fees and costs related to recruitment, and ongoing employment, should be covered by the employer (as per ILO definition of fees and costs). These fees

and costs include; agency fees, placement fees, transport costs, taxes, worker cards/ permits and renewals, visa costs, medical costs, pre-departure training, orientation, insurance, and employer contributions to social security. Employers are responsible for any costs when contracts or documents need to be renewed.

8. Employers and recruitment agents must include a list of recruitment costs, and service fees in their contract or Service Level Agreement (SLA). The employer's contract with the recruitment agent must specify who is responsible for the reimbursement of any fees incorrectly paid by the worker, including by sub-agents. Recruitment agents must provide employers with a recruitment process flow, including details on any sub-agents.

9. It is the employer's responsibility to verify that the recruitment agency is complying with their contractual terms including their use, and responsibility for the actions of any sub-agents; this can be through audits, worker interviews and confidential grievance mechanisms. Applicants must be able to access employers grievance mechanisms throughout the recruitment process.

10. Employers must give recruitment agents realistic time for recruitment processes to enable them to follow the correct procedure.

11. Employers must allow recruitment agencies to check that their site and contracts are compliant with information provided in the recruitment process.

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12. Migrant workers already in the country of employment must have the same opportunities for employment as migrant workers recruited across borders.

B. ORIENTATION AND TRAINING

1. On arrival migrant workers orientation must include information on their rights and obligations, relevant local laws and employment registration procedures, healthcare provisions and providers, mental health awareness and support, risks around local infectious diseases (including STDs), employer rules and regulations, disciplinary systems, communication systems, and grievance processes. Employers must also outline how they will support workers in the event of accidents, repatriation and any issues with local authorities. Training must take place before work commences and the cost of training, including workers time, must be covered by the employer.

2. For illiterate employees, the information must be explained to them in their own language by a translator who is independent of the recruitment agency.

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3. Employers must ensure migrant workers are introduced to worker committee representatives and managers who speak their language.

C. EMPLOYMENT TERMS

1. Employers are responsible for ensuring all applicants have the right to work and required paperwork before departure.

2. Employment contracts must be in worker's own language. It is the employer's responsibility to ensure migrant workers understand and freely accept terms and conditions before contracts are signed.

3. Migrant workers must receive a copy of their signed contract which specifies their employment terms and conditions, and the employers policy on recruitment fees and costs, and provisions for illness and repatriation before they leave their home country.

4. Worker's understanding of contracts must be checked pre-departure and on arrival to ensure consistency. Any inconsistency between contracts provided by a recruitment agent and employer must be addressed immediately with remedial action where required.

5. Unless specified in local law, no migrant workers must have to pay deposits or security payments as a condition to their employment. No applicants documents should be retained by recruitment agents, or the employer.

D. WORKING HOURS

1. It is the responsibility of the supplier partner to ensure any sub-contractors or labour agencies comply to their working hours policy.

In order to ensure supplier partners policy of no forced overtime (in principle and practice) there must be a process for approving, accepting or refusing overtime. The process must ensure overtime is allocated fairly. All relevant staff must be trained in the policy.

E. PAY

1. Employers must help migrant workers enrol in obligatory state social security and taxation systems, and if needed, to set up a bank account of their choice. Migrant worker's wages must be paid into an account in their own name.

2. Migrant workers must receive itemised payslips in their own language. Where this is not possible the employer must display translations of itemised payslips on worker notice boards. 3. No deductions must be made from pay including forced saving schemes, deposits, "runaway insurance" or disciplinary purposes.

F. BENEFITS

 Migrant workers must be able to choose whether to live in employer provided housing or to make their own living arrangements.
 Employers must assist workers who require support finding suitable accommodation.

2. If the employer helps to arrange accommodation, workers must have options (including transport) clearly explained in their own language. Migrant workers must not be denied freedom of movement.

3. Migrant workers living in employer provided on-site accommodation must have access to recreation facilities. Employers should consider offering language training to encourage integration along with access to the internet and Wi-Fi.

4. Employers must take account of migrant workers' dietary needs related to health or religious requirements or allow them to provide their own food on site.

5. Migrant workers must be free to return home during paid leave without fear of reprisal or sanction.

G. WORKER REPRESENTATION

1. Migrant workers must have the right to choose whether to join a trade union. Where this is prohibited by law, the employer must ensure migrant workers are fairly represented on their worker committee. Renewal of collective bargaining agreements must be in line with local legal requirements.

 Independent translation facilities must be made available where required to allow migrant workers to communicate confidentially and collectively within the worker committee.
 Provisions must be made for worker representatives to fulfill their roles within working hours, pay must not be deducted for this time.
 Worker committee meeting minutes must be made available in all worker's languages.

3. Employers must not interfere with migrant workers' approaches to worker committee representatives for support. Adequate protections must be in place to protect workers from interference or discrimination.

H. HEALTH AND SAFETY

1. Employers must ensure migrant workers receive health and safety training in a language they understand before they start work. Our commitment and Human rig responsibility supply

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2. Operational instructions, safety notices and labelling of hazardous materials must be translated into relevant languages or put in pictorial form.

3. Employers are responsible for ensuring migrant workers understand the healthcare available to them on and off site.

I. WORKER PROTECTION AND GRIEVANCE PROCEDURES

1. Employers must have a migrant worker policy which complies with international human rights law, signed by senior management.

2. Line managers and supervisors must be trained to recognise the additional provisions required when working with migrant workers so that they are not discriminated against. For example, provision must be made to ensure communication on the factory floor is in worker's languages.

3. Employers must not retain worker's identity documents; safe keeping of documentation or possessions by the employer, at the request of any employee is not an acceptable alternative. All workers must be offered safe lockable storage for their documents that they can access freely. 4. A document retention policy must be signed by workers explaining the process when identity documents are required by the employer for permit processing.

5. Where employers identify migrant workers that have become undocumented, the employer must explore ways to bring workers back to regular status.

6. Employers are responsible for ensuring migrant workers understand the grievance procedures and access to remedy available to them. Grievance mechanisms must be available to all workers on site including sub-contracted workers. They must be accessible to workers. They must be accessible to workers in their own language. All grievances, investigations and remedy must be documented and protection from reprisals must be guaranteed. Sensitive, high risk cases must be investigated by skilled staff who are not related to the case in question and must use an approach that secures the confidence and participation of the worker involved.

Where grievances have occurred all workers must have access to remedy that reflects the severity of the grievance. The worker should play a role in defining remedy - remedy is not only financial compensation. For example remedy may be support for rehabilitation and recovery, health care services, return assistance

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or restitution. Access to judicial remedy must not be denied.

7. Access to judicial remedy must not be denied.

J. END OF EMPLOYMENT

1. The employer must bear the full costs of repatriation for migrant workers at their end of their contract or in exceptional circumstances (e.g. medical emergency, political unrest placing workers in danger). Employers must honour contracts with migrant workers and not use false reasons for terminating a worker's contract prematurely to avoid the costs associated with repatriation.

2. Where migrant workers terminate their contract after their probation, but before contract end, there must be no penalty and the usual assistance in repatriation must be provided unless the worker is in clear breach of contract.

3. Where dismissal occurs, there must be a suspension period to enable independent investigation without risk of deportation. While complaints are being investigated workers have the right to remain employed and remain in their accommodation.

4. Freedom to change employment must be respected and legal requirements followed.

5. At the end of a contract all migrant workers must be paid outstanding wages and any other benefits or savings accrued in full before they leave.

6. In cases of retrenchment, the employer must provide fair compensation and cover the costs of repatriation.

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SUPPLIER PARTNER REQUIREMENTS: CHILD LABOUR AND YOUNG WORKERS

SUPPLIER PARTNER REQUIREMENTS: CHILD LABOUR AND YOUNG WORKERS

The World Wise Foods Group recognises that every child has the right to be protected from harm, the right to an education and should attend school before they start working. The World Wise Foods Group takes responsibility to ensure the protection and welfare of any child or young person identified in our supply chains. The ILO define young workers as between the age of 18-24.

The World Wise Foods Group recognises that child labour is complex, particularly at farm level; visibility can be low and it can be difficult to identify occasional work to assist the family versus child labour. The International Labour Organisation has identified that the majority of child labourers work in agriculture and that low household income and pressure from families to work contribute to child labour. Once in work, children are often put in low skilled positions, are vulnerable to abuse by supervisors and are very dependent on employers if they have left home.

While 18 is the usual minimum employment age for our tier one supplier partners, we recognise that additional efforts are required to verify this, and to ensure child labour does not take place in the lower tiers of our supply chain. The World Wise Foods Group recognises the binding international standards⁵ that define child labour and expect our supplier partners to uphold these standards by meeting the requirements in this policy. We also expect tier one supplier partners to share this, or their own policy, with their suppliers and to identify and verify areas of risk in our shared supply chain.

The World Wise Foods Group expects our supplier partners to comply with the following practices:

- Employers shall employ workers aged over 18, or legal working age. No workers must be employed under the age of 15 or within the age of compulsory school age.
- Employers are responsible for verifying the age of all their workers and must be trained to identify false documents.
- If child labour is found it must be reported to the World Wise Foods Group immediately; The World Wise Foods Group will support supplier partners and work with them on a remediation process. The World Wise

Foods Group is prepared to terminate relationships with supplier partners if they deliberately fail to respect this policy or refuse to undertake an agreed remediation process.

- If child labour is found, the protection of the child and their interest comes first. They must not be dismissed; a remediation process must be followed, and solution sought, in collaboration with their family, that enables access to education. The child must not work but must receive pay and accommodation to ensure work elsewhere is not sought. A full remediation process must be agreed with the World Wise Foods Group before it is implemented.
- Violence against any worker, including children or young workers is a serious offence and must result in dismissal.
- Young workers under the age of 18 must not be employed to work at night, or in conditions which compromise their health, safety or moral integrity, and/or which harm their physical, mental, moral or social development.

Employers are responsible for identifying such conditions through risk assessments.

- Part-time work must not interfere with a child's education.
- The World Wise Foods Group supports formal work-based training and apprenticeship programmes that enable young workers to learn new skills. These must be properly registered and supervised and not used as a form of forced or lowcost labour.
- Children (under the age of 15) are not allowed onto production sites or in working areas on employer owned plantations. The only exception to this is for school educational events.

5 ILO's 'Worst Form of Child Labour Convention' 182, ILO Convention 138 and the ETI Base Code.



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SUPPLIER PARTNER REQUIREMENTS: WOMEN IN OUR SUPPLY CHAINS

The World Wise Foods Group recognises that gender diversity helps businesses perform better; holding back half the population from achieving their full potential at work does not make good business sense. We support the UN <u>Women's Empowerment Principles</u> which focus on empowering women in the workplace and community.

Women are an essential part of global supply chains and make a significant contribution to our business. While globalisation has led to increasing employment opportunities, women hold a greater share of informal and seasonal employment and are more likely to be found in low skilled, low waged jobs. We recognise that women are a vulnerable group in our supply chains, and that ensuring the inclusion of their skills, experiences and potential requires intentional actions.

The World Wise Foods Group recognises that our supplier partners have a unique opportunity to address the constraints that affect women in the workplace by ensuring they are gender sensitive employers – from recruitment, promotion, skills development and working conditions through to support for work life balance.

As well as complying with the practices outlined under workplace equality in this policy, we

expect our supplier partners to comply with the following practices in order to ensure workplace equality for women:

A. EMPLOYMENT TERMS

1. Employers must not ask women for information such as marital status, pregnancy plans or use of contraceptives as part of recruitment processes. Employers must seek to understand and accommodate the specific factors that affect women's attendance and retention within reason – for example primary care responsibility for dependents.

B. ACCESS TO TRAINING

1. Employers must ensure any education and training is provided at a time and location that is accessible to women.

C. WORKING HOURS, PAY AND BENEFITS

1. Women workers' contracts must be equal to other workers in the same role (pay, benefits including maternity pay, holiday pay, job security, length of contract and terms and conditions). 2. All women workers must have full control of their wages. Wages must be paid into a bank account of their choice in their own name.

D. ACCESS TO PROMOTION

1. Women workers must have equal access to opportunities in the workplace; for example through overtime or promotion. Employers must be self-aware regarding promotion practices that are intentionally, or unintentionally excluding women. For example, women's job mobility must not be restricted by the segregation of "male" and "female" jobs.

E. WORKER COMMUNICATION

1. Women workers must be proportionally represented on worker committees.

2. Supervisors must be trained and aware of the power dynamics between male and female workers. Expectations of appropriate behaviour and disciplinary actions for inappropriate behaviour must be included at worker orientation and in all worker's contracts.

3. Employers must proactively seek feedback from women workers either by requesting

auditors to interview women workers individually or in groups, or through analysing women workers' perspectives in their worker surveys.

F. HEALTH AND SAFETY

1. Employers must take into consideration the specific needs of women workers on site. PPE must be available that fits women. Close access and adequate sanitary facilities, provision of lidded sanitary bins, re-assignment and/or additional rest breaks for pregnant workers, breastfeeding rooms, maternity leave (as required by local law as a minimum) and access to women only areas for religious worship. Where possible childcare provision can be offered.

G. PROTECTION FROM HARASSMENT, GRIEVANCE PROCEDURES AND ACCESS TO REMEDY

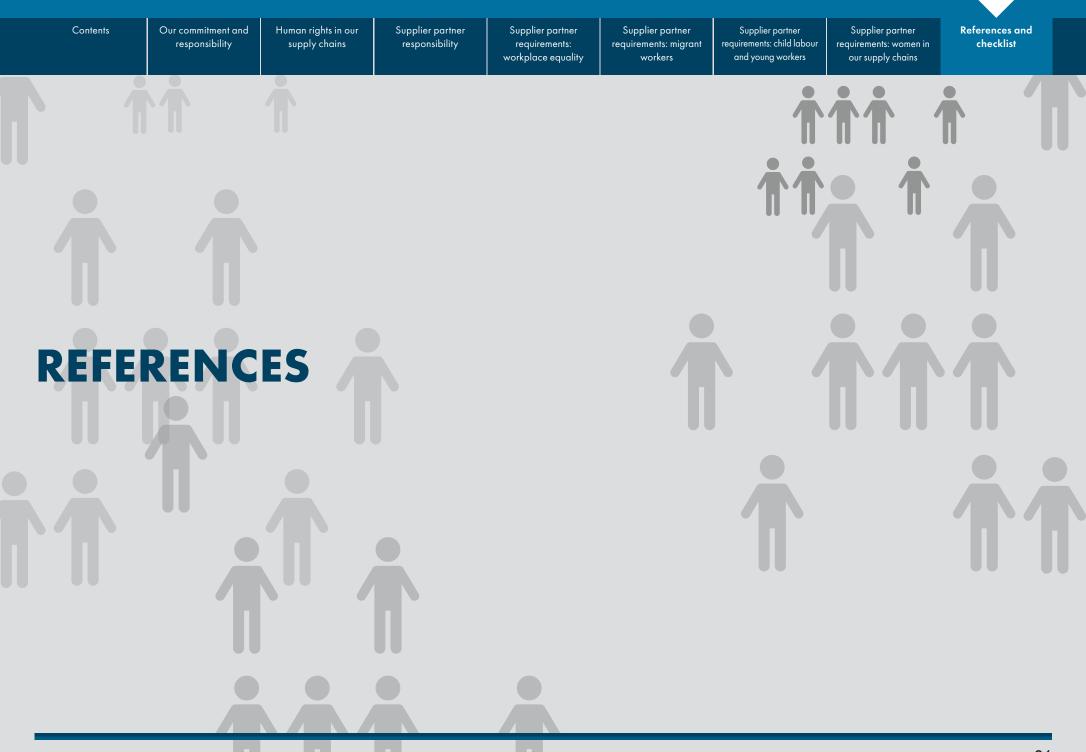
1. Employers must consider any extra actions that are needed to ensure women workers are safe, and feel safe whether it be on site, at on site accommodation, at (provided or recommended) offsite accommodation or through transport provision (particularly after dark).

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Human rights in our Supplier partner supply chains responsibility

Supplier partner requirements: workplace equality Supplier partner requirements: migrant workers Supplier partner requirements: child labour and young workers in our supply chains References and checklist

2. Employers must have a procedure in place when women workers raise grievances relating to sexual harassment, intimidation or violence, which include options for protection (e.g. alternative accommodation) of workers during investigations. The ILO definition of sexual harassment is "sex-based behavior that is unwelcome and offensive to its recipient", the definition of Gender Based Violence is "harmful acts directed at an individual based on their gender". A commitment to remediation must be articulated in the policy, as must serious disciplinary actions for perpetrators.



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Supplier partner requirements: workplace equality

REFERENCES:



ETI Base Code

Dhaka Principles

<u>UN Guiding Principles on Business and Human Rights</u> - they are also explained in <u>this</u> short video

Translations of UN Guiding Principles of Business and Human Rights

UN Women's Empowerment Principles

ILO's <u>'Worst Form of Child Labour Convention' 182</u> and <u>ILO Convention 138</u>

World Wise Foods Responsible Sourcing Code of Practice

ILO Declaration on Fundamental Principles and Rights at Work

Supplier partner responsibility

SUPPLIER PARTNER CHECKLIST

Supplier partner requirement	Compliant ✔/¥	Agreed next steps:
lier partner responsib	ility: minimu	m standards
\inimum standards		
Supplier partner responsib	ility: respon	sible, responsive employers
Responsible, responsive		
employers		
Supplier partner requireme	ents: workpl	ace equality
A. Recruitment		
1		
2		
3		
B. Orientation and training		
1		
2		
C. Employment terms		
1		
2		
3		
4		
5		
6		

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Supplier partner requirement	Compliant ✔/¥	Agreed next steps:	Supplier partner requirement	Compliant ✔/¥	Agreed next steps:
H. Health and safety			11		
1			12		
2			B. Orientation and training		
3			1		
. Worker protection and grievanc	e procedures		2		
]			3		
2			C. Employment terms		
3			1		
4			2		
5			3		
I. End of employment			4		
1			5		
2			D. Working hours		
3			1		
1			E. Pay	1	
Supplier partner requireme	ents: migran	t workers	1		
A. Recruitment			2		
1			3		
2			F. Benefits	1	
3			1		
4			2		
5			3		
6			4		
7			5		
8			G. Worker representation		
9			1		
10			2		
			3		

	References and checklist
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Supplier partner requirement Compliant	Agreed next steps:	Supplier partner requirement	Compliant ✔/¥	Agreed next steps:
H. Health and safety		Supplier partner requireme	nts: women	in our supply chains
1		A. Employment terms		
2		1		
3		B. Access to training		
I. Worker protection and grievance procedures		1		
1		C. Working hours pay and benefit		
2		1		
3		2		
4		D. Access to promotion		
5		1		
6		E. Worker communication		
J. End of employment		1		
1		2		
2		3		
3		F. Health and safety		
4		1		
5		G. Worker protection and grievan	ce procedu <u>res</u>	
6		1		
Supplier partner requirements: child lab	bour and young workers	2		
Child labour and young workers				·

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American Tuna, Inc.



