

Foyle Food Group			
Human Resources Policy Manual			
Module			Authorisation Signature 
Child Labour Policy			
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Company Child Labour Policy

The Foyle Food Group acknowledges the fact that child labour occurs in many countries. However, the Foyle Food Group does not accept child labour, and works actively against it. The complexity of the child labour issue requires a consistent, long-term effort to create sustainable and broad-based solutions in order to reach our goal; that no products delivered to the Foyle Food Group are produced by child labour.

The Foyle Food Group respects different cultures and values in countries where we operate and source our product, but does not compromise on the basic requirements regarding the Rights of the Child.

The Foyle Food Group Child Labour Policy has been established in order to make our position clear to suppliers and their co-workers, as well as any other parties. The requirements in this code of conduct are mandatory to all suppliers and their sub-contractors.

1. General Principle

The Foyle Food Group does not accept child labour.

The Foyle Food Group supports the United Nations (U.N.) Convention on the Rights of the Child (1989).

The Foyle Food Group child labour policy is based on this Convention, which stipulates:

- *“All actions concerning the child shall take full account of his or her best interests.”* Article 3.
- *“The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development”.* Article 32.1.

In addition, this policy is based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973). According to this convention, the word “Child” is defined as any person below fifteen (15) years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. If, however, the local minimum working age is set at fourteen (14) years of age in accordance with exceptions for developing countries, the lower age will apply.

This Policy also incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

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2. Implementation

All actions to avoid child labour shall be implemented by taking the child's best interests into account. The Foyle Food Group requires that all suppliers shall recognise the U.N. Convention on the Rights of the Child, and that the suppliers comply with all relevant national and international laws, regulations and provisions applicable in the country of production.

Suppliers are obliged to take the appropriate measures to ensure that no child labour occurs at suppliers' and their sub-contractors' places of production.

If child labour is found in any place of production, The Foyle Food Group will require the supplier to implement a corrective action plan. If corrective action is not implemented within the agreed time-frame, or if repeated violations occur, The Foyle Food Group will terminate all business with the supplier concerned. The corrective action plan shall take the child's best interests into consideration, i.e. family and social situation and level of education. Care shall be taken not merely to move child labour from one supplier's workplace to another, but to enable more viable and sustainable alternatives for the child's development.

The supplier shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of The Foyle Food Group Child Labour Policy, and ensure that all measures required are implemented accordingly.

3. Young Workers

The Foyle Food Group supports the legal employment of young workers.

Young workers of legal working age have, until the age of 18, the right to be protected from any type of employment or work which, by its nature or the circumstances in which it is carried out, is likely to jeopardise their health, safety or morals.

The Foyle Food Group therefore requires all its suppliers to ensure that young workers are treated according to the law; this includes measures to avoid hazardous jobs, night shifts and ensure minimum wages. Limits for working hours and overtime should be set with special consideration to the workers' young age.

4. Labour force register

The supplier shall maintain documentation for every worker verifying the worker's date of birth. In countries where such official documents are not available, the supplier must use appropriate assessment methods as per local practice and law.

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5. Monitoring

All suppliers are obliged to keep the Foyle Food Group informed at all times about all places of production (including their sub-contractors). Any undisclosed production centres found would constitute a violation of this code of conduct.

Through the General Purchasing Conditions for the supply of products to the Foyle Food Group, the Company reserves the right to make unannounced visits at any time to all places of production (including their sub-contractors) for goods intended for supply to the Foyle Food. We furthermore reserve the right to assign, at its sole discretion, an independent third party to conduct inspections in order to ensure compliance with our Child Labour policy.

6 Remediation¹

If child labour is found in the supply chains of The Foyle Food Group, it will seek to work in partnership with the supplier and appropriately qualified organisations to develop a responsible solution that is in the best long-term interests of the children. The supplier and the Foyle Food Group will agree a corrective action plan, which may comprise the following actions:

- Collate a list of all potential child labourers and young workers
- Seek advice and help from a recognised local non-governmental organisation that deals with child labour or the welfare of children²
- Develop a remediation plan that secures the children's education and protects their economic well-being, in consultation with the Foyle Food Group and where possible a local NGO, and in consultation with and respecting the views of the child
- Explain the legal requirements and restrictions on working ages to the children and assure them that, if they wish, they will be employed when they reach working age
- Understand the children's desires and explore the opportunities for them to re-enter education.
- Whether the child contributes to the livelihoods of their family or they are self-dependent, his or her wage should continue be paid until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an unemployed adult family member in place of the child labourer).
- Ensure that the child worker has adequate accommodation and living conditions.

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- Document all actions
- Develop processes to prevent recurrence
- Do not:
 - Expel any of the suspected or confirmed child labourers and/or young workers
 - Threaten the children or their families or hamper the progress of investigation and remediation
 - Conceal or falsify any documentation

Such actions will be considered by the Foyle Food Group as evidence that the supplier is not committed to child labour remediation, in breach of this Child Labour Policy.

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