



The Neil Jones Food Company

ANTI-HUMAN TRAFFICKING POLICY

Policy Number: 190

Effective Date: March 15, 2019

APPLICABILITY AND SCOPE

This Policy applies to all personnel employed by or engaged to provide services to The Neil Jones Food Company (NJFC), including, but not limited to, NJFC's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, suppliers, and independent contractors (for ease of reference throughout this Policy, "workers").

Every NJFC worker is responsible for reading, understanding and complying with this Policy.

NJFC managers are responsible for ensuring that workers who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them.

The Director, Purchasing is responsible to communicate this policy to our contractors, subcontractors, and suppliers.

PRINCIPLE

Guided by our values and beliefs as further discussed in the Business Code of Conduct, NJFC is committed to integrity and social responsibility which includes a work environment and supply chain that is free from Human Trafficking. This policy outlines the efforts NJFC makes to seek to eliminate Human Trafficking from our supply chain. NJFC will not tolerate or condone Human Trafficking in any part of our organization.

POLICY

NJFC will not tolerate and will not condone the use of Human Trafficking in any form, including slavery, forced, involuntary or coerced labor, or Child Labor. NJFC employees, contractors, subcontractors, vendors, suppliers, partners and others through whom NJFC conducts business must not engage in any practice that constitutes trafficking in persons or slavery. To that end, NJFC shall, and requires its workers, agents, subcontractors, and suppliers, to:

1. Not engage in any form of Human Trafficking, whether by force, fraud, or coercion; or any form of involuntary servitude or slavery; or any form of sex trafficking or the procurement of any commercial sex act;
2. Not knowingly use any form of forced or involuntary labor, including through the use of:
 - threats of serious harm to, or physical restraint against, a person or another person; or
 - any scheme, plan, or pattern intended to cause a person to believe that, if the person did not perform such labor or services, that the person or another person would suffer serious harm or physical restraint; or
 - any abuse or threatened abuse of law or the legal process;
3. Not engage in or support the use of Child Labor and comply with all applicable local child labor law;
4. Not destroy, conceal, confiscate, or otherwise deny access to a worker to the worker's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority;
5. Not use misleading or fraudulent practices during the recruitment of workers or offering of employment, and endeavor to the extent possible to disclose to worker(s), in a format and language accessible to the worker, basic information regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by NJFC or its agents), any significant cost to be charged to the worker, and, if applicable, the hazardous nature of the work. If required by law, NJFC or its agents shall provide an employment contract, recruitment agreement, or other required work document in writing, which shall be in a language the employee understands;
6. Comply with all applicable local wage, benefit, and working hour labor laws;
7. Not charge workers recruitment fees and not use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
8. If required by law or contract, provide return transportation or pay for the cost of return transportation upon the end of employment;
9. If NJFC provides or arranges housing for workers, the housing shall meet the host country housing and safety standards;

DETAILS

NJFC is committed to a work environment that is free from Human Trafficking, which for purposes of this policy includes Forced Labor and unlawful Child Labor. This policy is consistent with NJFC's Business Code of Conduct and core values: 1) We will obey all legal requirements, 2) We will be honest and truthful in our communications, 3) We will act with integrity, mindful of our obligations, and 4) We will be fair and respectful in our workplace.

NJFC employees, contractors, subcontractors, vendors, suppliers, partners and others through whom NJFC conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

Responsibility

Employee Compliance

Each employee and agent of NJFC is responsible for ensuring compliance with this Policy. NJFC shall periodically review and evaluate its internal operations and supply chain to identify and assess the potential risks of activity that could violate this policy.

As part of its mandated annual employee training, NJFC will include training on Human Trafficking to employees responsible for managing other employees as well as those employees responsible for its supply chain. Additionally, NJFC will provide training to employees who are members of its procurement team, who are tasked with communicating this policy to our contractors, subcontractors, and suppliers.

Third Party Compliance

NJFC suppliers and subcontractors who supply any product or service that is incorporated into NJFC's products are required to review this Policy and comply with it and with the NJFC Purchasing & Supplier Guidelines. Such suppliers and subcontractors will be required to periodically certify that they (a) have read and understand this Policy and the NJFC Purchasing & Supplier Guidelines and (b) comply with the expectations in the NJFC Purchasing & Supplier Guidelines and the laws regarding Human Trafficking and the labor standards of the country or countries in which they do business.

Reporting

Any NJFC worker, agent, subcontractor, or supplier that is informed of or witnesses a violation of this Policy, or is uncertain about the proper course of action relating to the matters addressed in this Policy, is encouraged to immediately contact his or her supervisor or Human Resources Department. If the issue is not resolved or the worker is not comfortable raising the issue with his or her supervisor, the following reporting channels are available:

1. Information regarding a potential violation of this Policy, whether by a NJFC employee, agent, subcontractor or subcontractor employee, or supplier must be immediately reported to the Human Resources Department.
2. Any reporting shall be done without fear of retaliation. NJFC will not tolerate retaliation against a worker for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.
3. Workers, agent, subcontractor or subcontractor employee or supplier aware of potential Human Trafficking violations may, in addition, contact the U.S. State Department's Global Human Trafficking Hotline directly at 1-844-888-FREE or help@befree.org.

Violations

NJFC has a zero tolerance policy regarding any of its workers, agents, contractors, subcontractors or suppliers who engage in or support the use of Human Trafficking, including slavery, forced, involuntary or coerced labor, Child Labor, or sex trafficking. Failure to comply with this Policy will result in disciplinary action, up to or including termination of employment. If a

contractor, subcontractor or supplier is found in violation of this Policy, NJFC will take remedial measures to address the violation, up to and including termination of the supplier or subcontractor.

DEFINITIONS

For purposes of this policy, the following definitions apply:

HUMAN TRAFFICKING – Trafficking in persons, human trafficking, and modern slavery are used as umbrella terms to refer to both sex trafficking and compelled labor. This describes the act of recruiting, harboring, transporting, providing or obtaining a person for compelled labor or commercial sex acts through the use of force, fraud, or coercion. The Trafficking Victims Protection Act of 2000 as amended (TVPA) and the *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime* (the Palermo Protocol) describe this compelled service using a number of different terms, including involuntary servitude, slavery or practices similar to slavery, debt bondage, and forced labor.

FORCED LABOR – sometimes also referred to as labor trafficking, encompasses the range of activities – recruiting, harboring, transporting, providing, or obtaining – involved when a person uses force or physical threats, psychological coercion, abuse of the legal process, deception, or other coercive means to compel someone to work. Once a person's labor is exploited by such means, the person's prior consent to work for an employer is legally irrelevant: the employer is a trafficker and the employee a trafficking victim.

CHILD LABOR – does not include all work performed by minors; rather, only that which harms their physical and mental development. Such labor deprives children of their childhood, potential, and dignity.

QUESTIONS

Any questions or concerns regarding this policy should be addressed to the NJFC Corporate Human Resources Department.

RESOURCES

- The Neil Jones Food Company Business Code of Conduct
- The Neil Jones Food Company Purchasing & Supplier Guidelines
- The California Transparency in Supply Chain Act
- U.S. Department of State Human Trafficking Definitions (<https://www.state.gov/j/tip/what/>);
- U.S. Department of State Human Trafficking Awareness Training (https://www.dhs.gov/xlibrary/training/dhs_awareness_training_fy12/launchPage.htm)