	Document Title:	Document Number:	CCE_HR_008
	Child and Forced Labour Prevention Policy	Process Owner:	Human Resources Manager
		Revision Number:	004
		Revision Date:	June 4, 2025

Child and Forced Labour Prevention Policy

Purpose - Markdom is committed to eliminating all forms of child labour, forced labour, and human trafficking in its operations and supply chains. This policy supports the principles of the UNGC and the International Labour Organization (ILO) standards.

This policy also establishes a formal remediation and responsible disengagement framework to address any identified or suspected instances of child labour or forced labour in a manner that protects affected individuals, prevents further harm, and aligns with applicable legal and ethical obligations, including Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211).

Scope - This policy applies to all Markdom employees, managers, contractors, business partners, and suppliers, including all third parties who provide goods or services to Markdom

Definitions:

- **Child:** Any person under 18 (eighteen) years old.
- **Child Labour** Work that deprives children of their childhood, education, potential, or dignity, and is harmful to their physical or mental development, as defined by the International Labour Organization (ILO).
- **Forced Labour:** Any work or service exacted from a person under threat or coercion, including withholding wages, restricting movement, retaining identity documents, or debt bondage
- **Voluntary Employment** means workers’ consent to enter into employment and to their freedom to leave the employment at any time, with reasonable notice in accordance with Ontario’s law or the Markdom’s contract agreements.


Policy Statements

a. Prohibition of Child Labour

Markdom strictly prohibits and does not tolerate any use of child labour in its operations or supply chains. If a violation occurs, corrective measures will be taken immediately, including safeguarding the child's welfare and ensuring the continuation of their schooling.

Preventive Measures: Markdom has established a reliable strategy to prevent child labour by verifying the ages of job applicants through the following methods:

- Verification of employee age through valid government-issued identification

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- Requiring the Recruitment Agency to submit a registration form with ID for age verification.
- Inclusion of age verification in the new hire checklist.

If a violation occurs, corrective and remediation measures will be taken immediately, including safeguarding the child’s welfare and ensuring access to education.

b. Prohibition of Forced Labour

Markdom prohibits all forms of forced, bonded, or compulsory labour. Workers must have freedom of movement and the right to leave employment voluntarily with reasonable notice.

Preventive Measures: Markdom implements a strategy in order to prevent forced labour practices using the following techniques:

- Written employment contracts for all employees specifying wages, working hours, and rights.
- Prohibition of withholding identity documents or wages.
- Regular training on the Ontario Human Rights Code, Forced Labour, and Human Trafficking.
- Engage shareholders and potential investors on ethical practices, focusing on forced labour prevention as part of our commitment to responsible business.


c. Supplier Expectations

All suppliers, contractors, and partners must adhere to Markdom's ethical standards as outlined in the Supplier Code of Conduct. Key requirements include:

- Compliance with all laws regarding labour, environment, and human rights.
- Elimination of forced, bonded, or child labour.
- Provision of safe and inclusive workplaces.
- Support for human rights and fair labour practices.
- Acknowledgment and signing of the Supplier Code of Conduct.
- Suppliers must ensure fair treatment and equal opportunities for all employees, prohibiting discrimination based on race, gender, sexual orientation, health condition, disability, age, nationality, or religion.

Monitoring & Compliance:

Markdom requires suppliers to provide traceability of raw materials to ensure compliance with the Uyghur Forced Labour Prevention Act (UFLPA) and other relevant laws. Markdom may initiate due diligence, targeted audits, or remediation actions where elevated risk is identified.

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Reporting – Employees, visitors, contractors, and suppliers can report concerns anonymously if they are a witness to any use of child labour.

- ✓ They can use the [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- ✓ Use the QR
- ✓ Email at hr@markdom.com



Remediation Protocol

1. Immediate Protective Actions

If child labour or forced labour is identified or reasonably suspected:

- Affected individuals will be immediately removed from the harmful situation without retaliation.
- Procurement activity with implicated suppliers may be suspended;
- Immediate steps will be taken to protect health, safety, dignity, and well-being.

2. Supplier Corrective Action & Accountability

If a supplier is implicated:


- A documented corrective action plan will be required;
- Enhanced monitoring, audits, or third-party verification may be implemented;
- Failure to remediate may result in termination of the supplier relationship

Documentation & Governance

- All remediation actions will be documented.
- Issues may be escalated to senior management and the Board.
- Lessons learned will inform training, supplier risk scoring, and policy updates.

Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Awareness and prevention of child and forced Labour	100% completion rate of annual training for employees and suppliers	Annual	HR / Procurement
Zero tolerance for child and forced labour	Zero substantiated incidents across operations and supply chains	Annual	HR/Procurement
Strengthen supplier due diligence	100% of Tier 1 suppliers assessed for child and forced labour risks.	By 2026	HR / Compliance
Remediation readiness	100% cases addressed per protocol	Ongoing	HR / Compliance

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Monitoring and Review

Regular reviews will be conducted to ensure compliance with laws and continuous improvement in the Child and Forced Labour Prevention Policy. Noncompliance will lead to corrective actions or termination of the supplier relationship

RECORD OF REVIEWS

Date	Revision Description	Approved By	Revision Level
02/20/2024	Initial Release	HR Manager - Johanna Agaton	001
04/29/2024	Document # allocated	HR Manager - Johanna Agaton	002
02/04/2025	Added our Target	HR Manager - Johanna Agaton	003
June 4, 2025	Revised and aligned with UNGC targets Added targets and goals	HR Manager - Johanna Agaton VP Global Operations	004