

Anti-Slavery, Child Labor & Remediation Policy

<i>Policy Owner</i>	<i>Vice President, Human Resources, Van Drunen Farms and FutureCeuticals</i>
<i>Effective Date</i>	<i>March 31, 2026</i>
<i>Last Date of Review</i>	<i>VDFFC Anti-Slavery & Child Labor Policy, February 2023</i>
<i>Applies To</i>	<i>All employees, contractors, subcontractors, suppliers, vendors, consultants, agents, labor providers and all other parties who work or act on behalf of Van Drunen Farms and FutureCeuticals where VDFFC operates.</i>
<i>Review Cycle</i>	<i>Upon material regulatory change</i>

1. Purpose & Scope

Change to Van Drunen Farms and FutureCeuticals (VDFFC) is committed to conducting business ethically, transparently and in full compliance with applicable laws. This Policy consolidates VDFFC's prohibitions against modern slavery, forced labor, human trafficking and all forms of child labor. It also establishes clear remediation procedures to be followed whenever a violation or suspected violation is identified.

All remediation actions will prioritize the best interests, safety, wellbeing, and long-term development of the child.

This Policy applies to:

- All VDFFC employees (full-time, part-time, seasonal and temporary)
- All contractors, subcontractors and labor/staffing agency workers performing work at or on behalf of VDFFC
- All suppliers, vendors, consultants and agents providing goods or services to VDFFC
- VDFFC operations and supply chain activities where VDFFC operates.

2. Modern Slavery & Anti-Slavery Policy

2.1 What Is Modern Slavery?

According to the International Labor Organization (ILO), more than 40 million people worldwide are victims of modern slavery. Modern slavery encompasses practices including forced labor, debt

bondage, forced marriage and human trafficking- situations where a person cannot avoid or leave due to threats of violence, coercion, deception, or abuse of power.

2.2 VDFFC's Commitment

VDFFC believes that modern slavery has no place in our business operations or supply chains. VDFFC strictly prohibits all covered parties from engaging in any form of forced or compulsory labor. All those who work or act on behalf of VDFFC must:

- Maintain and promote fundamental human rights, including freedom of movement of workers.
- Ensure all employment decisions are based on free and informed choice.
- Refrain from coercion, physical punishment, or threats of violence, sexual, psychological, or verbal abuse as a means of discipline or control.
- Ensure employment contracts clearly state terms of employment and do not restrict worker movement through retention of identity papers, holding of deposits, or any other actions designed to prevent workers from freely terminating employment.
- Not requiring workers to pay recruitment or other similar fees to obtain or retain employment.
- Ensure that any third-party recruitment agencies engaged comply with all of the above principles.

2.3 Uyghur Forced Labor Prevention Act (UFLPA) Compliance

On December 23, 2021, the United States enacted the Uyghur Forced Labor Prevention Act (UFLPA), which establishes a rebuttable presumption that goods produced wholly or in part in China's Xinjiang Uyghur Autonomous Region (XUAR), or by entities identified on the UFLPA Entity List, are not importable into the United States.

VDFFC will not transact business with any entity that operates in the XUAR or appears on the UFLPA Entity List. VDFFC will:

- Screen all potential vendors geographically and against the UFLPA Entity List prior to onboarding.
- Conduct periodic reviews of existing China-sourced products and vendor relationships for UFLPA compliance.
- Promptly discontinue any business relationship found to be in violation of the UFLPA.

3. Anti-Child Labor Policy

3.1 Minimum Age Requirements

VDFFC and all covered parties must comply with the minimum employment age defined by local law or regulation, as well as applicable to ILO standards. VDFFC's absolute minimum standard is:

No individual under the age of 14, the local legal minimum working age, or the compulsory schooling age; whichever is HIGHEST in the applicable jurisdiction; shall be employed or engaged in any capacity by VDFFC or on behalf of VDFFC.

3.2 Prohibited Work for Minors

Under no circumstances shall any person working or acting on behalf of VDFFC permit children to:

- Perform work that exposes them to undue physical, chemical, biological, or safety risks.
- Engage in work that could harm their physical, mental, or emotional development.
- Work in a manner that interferes with their compulsory education or vocational training.
- Perform hazardous work as defined by ILO Convention No. 182 or applicable to local law, regardless of parental consent.

3.3 Age Verification

All hiring managers, HR staff and labor providers engaging workers on behalf of VDFFC must:

- Verify the age of every new hire prior to commencing employment through reliable documentation (e.g., government-issued identification, birth certificate, or equivalent).
- Maintain copies of age-verification documentation in the employee or worker file for the duration of employment and for the period required by applicable law thereafter.
- Where labor providers supply workers, contractually require the labor provider to perform and document age verification before any worker is placed at a VDFFC site.

4. Escalation Protocol- Child Labor Identified

If child labor is identified or reasonably suspected in VDFFC operations or through a labor provider, the following escalation protocol must be initiated immediately:

Step	Action Required
1	The discovering employee or supervisor communicates the incident to the local HR Representative immediately.
2	The local HR Representative communicates with the respective Site Director.

3	The local HR Representative communicates to the respective Vice President of Human Resources.
4	If a labor provider is involved, the local HR Representative simultaneously communicates with the labor provider.
5	After all details are gathered and confirmed and the Vice President of Human Resources will coordinate any required legal, compliance, or government notifications.

All escalation communications must be documented in writing (email or secure internal system). No party in the escalation chain shall take unilateral remediation action without coordination with HR leadership and, where applicable, legal counsel.

5. Child Labor Remediation Procedures

The following steps must be carried out immediately upon confirmed identification of a minor in the workplace. Two members of management must be present throughout every interaction with the minor and with any adult identified as a parent, guardian, or supporting person.

5.1 Immediate Protective Steps

1. Immediately remove the minor from the work area to a safe, private location such as an office or conference room. Do not leave the minor unattended at any time.
2. Introduce yourself and clearly explain your role at the facility.
3. Explain to the minor, in age-appropriate language, why they have been removed from the work area and why you are speaking with them. Assure them that they are not in trouble.
4. Speak calmly and compassionately throughout all interactions. Ask the minor if they need an interpreter. If a bilingual member of management is available, confirm with the minor whether they are comfortable with that individual interpreting.
5. Inform the minor of VDFFC's confidentiality policy- only those with a legitimate need-to-know will be informed of the details.

5.2 Information Gathering

Ask open-ended questions to gather information necessary to ensure the minor's safety and well-being. Suggested questions include:

- What is your date of birth? How old are you?
- Is this your first job?
- Are you currently attending school? What grade are you in? Which school do you attend?
- Do you live with your parents or guardians?
- What are your parents' or guardians' names?
- Can you provide a phone number to reach a parent or guardian?

- If parents cannot be reached: Is there another adult in your household we can contact- a relative, sponsor, or case worker?

Document all information provided, including the names of all individuals present, in the official Incident Documentation Form (see Appendix A). Retain a copy in the HR file and forward a copy to the Vice President of Human Resources.

5.3 Determine Employment Circumstances

- Determine whether the minor was engaged directly by VDFFC or through a labor/staffing provider.
- Identify all job duties performed by the minor since the beginning of the employment relationship or assignment.
- Identify all shifts, hours, and schedules worked by the minor.

5.4 Communication with Parent, Guardian, or Responsible Adult

If at least one parent, guardian, or responsible adult is successfully contacted:

- Introduce yourself and explain the situation clearly and professionally.
- Collect the adult's full name, contact phone number(s) and their relationship to the minor.
- Explain that, due to company policy and applicable labor law, the minor cannot continue working.
- Advise compensation: VDFFC will pay the minor for all hours worked during the current week, plus any scheduled hours remaining in that week that are missed due to removal. If the minor was placed by a staffing/labor agency, VDFFC and the agency will share the cost of missed scheduled hours, and the agency will bill VDFFC for confirmed hours worked. This ensures the minor is made financially whole.
- Offer to provide contact information for local support organizations or agencies that may be of assistance to the minor and their family.

If no parent, guardian, or responsible adult can be reached:

- Ensure that two members of management are present for the entire interaction. If the minor was placed by a staffing agency, a representative of the agency must also be present.
- Explain the situation and VDFFC's obligations to the minor directly, using age-appropriate language.
- Explain how the minor will be compensated (as described above).
- Ask whether there is any support VDFFC can provide, including referrals to local organizations or services.
- Contact local authorities or social services as required by applicable law or as directed by HR leadership and legal counsel.

5.5 Labor Provider Accountability

Where the minor was supplied by a labor provider of staffing agency, VDFFC will:

- Immediately notify the labor provider and require their participation in the remediation process.
- Conduct a formal review of the labor provider's age verification and onboarding practices.
- Suspend the labor provider's placement authority pending the outcome of the review.
- Depending on the findings of the review, VDFFC reserves the right to terminate its contract with the labor provider, report the violation to relevant authorities and seek recovery of any costs incurred by VDFFC.

5.6 Supplier & Supply Chain Remediation

Where child labor is identified or suspected within VDFFC's supply chain, including suppliers, subcontractors, or third-party partners, VDFFC will require immediate and appropriate remediation actions aligned with the principles outlined in this Policy.

VDFFC will:

- Require the supplier to implement a remediation plan that prioritizes the best interests, safety, wellbeing and long-term development of the child
- Temporarily suspend or, where necessary, terminate the supplier relationship in cases of non-compliance or failure to remediate effectively
- Conduct follow-up verification, which may include audits, documentation review, or third-party assessments, to ensure remediation actions have been properly implemented

VDFFC will work collaboratively with suppliers, where appropriate, to support sustainable remediation outcomes while maintaining strict expectations for compliance with this Policy.

5.7 Long-Term Remediation & Support

- Support return to school or education
- Work with parents/guardians
- Partner with local NGOs or agencies

5.8 Root Cause Analysis & Preventative Actions

Following any confirmed incident of child labor, Van Drunen Farms will conduct a documented root cause analysis to understand how the incident occurred and to prevent recurrence. This analysis will consider factors such as hiring processes, age verification controls, labor provider practices, and site-level supervision.

Based on the findings, VDFFC will implement appropriate corrective and preventative actions, which may include:

- Strengthening hiring and age verification procedures
- Providing additional training to HR, hiring managers and site leadership
- Enhancing oversight and contractual requirements for labor providers and suppliers
- Updating internal policies, procedures, or controls as needed

All corrective actions will be documented, assigned ownership and tracked to completion.

VDFFC will also monitor and review incidents and trends over time to identify systemic risks and continuously improve its child labor prevention and remediation processes.

6. Non-Retaliation

Van Drunen Farms strictly prohibits retaliation or threats against any individual who:

- Reports a suspected or actual violation of this Policy in good faith.
- Cooperates with or assists in any internal or external investigation of a reported violation.

Any individual who engages in retaliation will be subject to disciplinary action up to and including termination of employment or contract. Where required by law, violations will be disclosed to relevant government authorities.

7. Reporting Suspected Violations

Any employee, contractor, or other covered party who suspects a violation of this Policy should report it immediately. VDFFC encourages prompt reporting and will treat all reports confidentially to the extent possible.

Suspected violations may be reported to:

- Your direct supervisor or manager
- Your local Human Resources representative
- VDFFC management at any level
- VDFFC Safe Report email (monitored exclusively by the VDFFC Legal Team):
safereport@vandrunen.com

Anonymous reports are accepted. VDFFC will investigate all reports thoroughly and take appropriate corrective action.

8. Training & Communication

VDFFC will ensure that all employees in hiring, HR, operations management, and procurement roles receive communication about this policy upon hiring. Specific teams may also receive training that could cover:

- Recognition of indicators of child labor, forced labor and modern slavery.
- The escalation and remediation procedures are set forth in this Policy.
- Reporting channels and non-retaliation protections.
- Applicable legal requirements including the UFLPA and ILO standards.

This Policy will be made accessible to all employees and covered parties via the VDFFC internal policy repository.

9. Policy Governance & Review

The Vice President of Human Resources holds overall ownership of this Policy. The HR, Legal, and Compliance teams are jointly responsible for implementation, monitoring, and enforcement.

This Policy will be reviewed in the event of:

- Material changes to applicable law or regulatory requirements.
- A significant incident or near-miss involving child labor or forced labor.
- Changes to VDFFC's operations, supply chain structure, or labor provider relationships.

Updates to this Policy must be approved by the Vice President of Human Resources and communicated promptly to all covered parties. Child labor incidents and remediation outcomes will be reviewed periodically to assess effectiveness and identify trends.

Policy Acknowledgment

By working or acting on behalf of Van Drunen Farms, all covered parties agree to comply with this Policy. Violations may result in disciplinary action up to and including termination, contract cancellation and referral to relevant authorities.

APPENDIX A

Child Labor Incident Documentation Form

Complete this form immediately upon identification of a minor in the workplace. Forward the completed form to the Vice President of Human Resources within 24 hours of the incident. Retain the original in a secure HR file.

Date of Incident	
Time of Incident	
Location / Facility	
Reported By (Name & Title)	
HR Representative Notified (Name)	
Plant Manager Notified (Name)	
Director of HR Notified (Name)	
Labor Provider Involved? (Yes/No)	<i>If Yes, Name of Labor Provider:</i>

Minor's Information

Minor's Full Name	
Date of Birth	
Age	
Gender	
Country of Origin	
Job Title / Duties Performed	
Start Date at Facility	
Shifts / Hours Worked	
Currently Enrolled in School? (Yes/No)	

Parent / Guardian / Adult Contact

Name of Adult Contacted	
Relationship to Minor	
Phone Number(s)	
Date/Time of Contact	
Adult Present On-Site? (Yes/No)	

Actions Taken

Immediate Steps Taken (describe)	
Compensation Arrangement (describe)	
Referrals to External Agencies (if any)	
Authorities Notified? (Yes/No- if Yes, specify)	

Witnesses / Additional Management Present

Name & Title (1)	
Name & Title (2)	

Signatures

HR Representative Signature / Date	
Plant Manager Signature / Date	
Director of HR Signature / Date	

Additional Notes:
