

STORMTECH Child Labor and Forced Labor Policy

1. Purpose and Scope

The protection of human rights and fundamental freedoms is a major concern for Stormtech, reflecting our commitment to ethical business practices and sustainability. Stormtech complies with international standards and rejects any form of child labor or forced labor.

As we embark on a journey to address these critical issues, our Child Labor and Forced Labor Policy serves as a robust framework, establishing guidelines and procedures to eliminate such practices from our operations and supply chain.

According to the International Labor Organization (ILO), millions of children worldwide are subjected to exploitative labor conditions, and an alarming number of individuals, including children, are forced into work under compulsion. Recognizing this global challenge, Stormtech stands firmly against child labor and forced labor, contributing to the international effort to eradicate these violations of fundamental human rights.

This policy does not only reinforce our commitment, but also aligns with the Stormtech Social Standards, which delineate the basic rights of employees and provide guidelines for environmental stewardship based on global standards. By implementing this policy, Stormtech seeks to explore the issues of child labor and forced labor, providing essential background information to enhance our understanding and drive meaningful change.

Application of the Policy

The Stormtech Performance Apparel Ltd policy is mandatory for all employees, highlighting our collective responsibility to protect human rights. Additionally, it extends to our valued partners and suppliers, ensuring compliance with the Stormtech Social Standards and, consequently, this policy, is a prerequisite for establishing and maintaining business relationships. Stormtech urges business partners to comply with their obligations, ensuring that subcontractors and sub-suppliers are informed of and adhere to the Stormtech Social Standards.

Stormtech is committed to monitoring, addressing, and eliminating instances of child labor and forced labor. This policy sets a comprehensive framework, reinforcing our commitment to ethical and responsible business practices, and fostering a supply chain free of exploitation.

2. Stormtech Child Labor Policy

1. Distinction between Child Labor and Young Workers

Stormtech, in alignment with internationally recognized standards, makes a clear distinction between child labor and young workers. While we strictly prohibit child labor, the employment of young workers who have reached the minimum age of employment and completed compulsory schooling is allowed under stringent conditions and in adherence to ILO standards.

2. Definition of Child Labor

Stormtech adopts the ILO's definition of the term “child labour” which means work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially, or morally dangerous and harmful to children; and/or
- interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

The worst forms of child labour involve children being enslaved, separated from their families, exposed to serious hazards and illnesses and/or left to fend for themselves on the streets of large cities – often at a very early age.

According with ILO Convention 138, employment of children who are under 15 years of age and have not completed compulsory schooling is not allowed.

Whilst child labour takes many different forms, a priority is to eliminate without delay the worst forms of child labour as defined by Article 3 of ILO Convention No. 182;

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

3. Prohibition of Child Labor

Stormtech, as an internationally active entity, is committed to setting minimum standards for itself and its business partners, outlined in the Workplace Code of Conduct posted on website and in Stormtech Supplier Manual.

We strictly prohibit child labor and collaborate with all suppliers based on these standards. Any failure to comply requires prompt remediation.

4. Preventive Strategy

To prevent child labor, Stormtech mandates effective controls in hiring procedures, including age verification through official identification. Reliable checks ensure compliance with minimum age requirements, with employers responsible for document authenticity. Inconsistent appearances may require additional verification through medical documents. Stormtech also requires confirmation of completed compulsory schooling.

Social compliance audits will be conducted regularly for direct business partners, ensuring adherence to our standards. For fabric and trimmings suppliers, self-assessment questionnaires will be required.

5. Dealing with Violations / Procedure

Any violation triggers immediate remediation, including cessation of child labor, compensation, and measures to safeguard the child's welfare. Stormtech monitors the implementation, requests information regularly, and assists in difficulties. Non-cooperation may lead to termination of the business relationship as a last resort.

6. Young Workers

According with understanding of ILO, Stormtech defines young workers as those aged 15 to 18 who have completed compulsory education. Their employment adheres strictly to national laws and international standards, ensuring fair pay, reasonable working hours, rest, and social security coverage.

7. Strategy for Avoidance of Non-Compliance

Proper registration of young workers and compliance verification through social audits and self-assessment for finished goods suppliers, fabric and trimmings suppliers are essential to prevent non-compliance.

8. Dealing with Violations / Procedure for Young Workers

Violations trigger immediate remediation and indemnification requirements. Stormtech monitors implementation, requests information regularly, and provides assistance in difficulties. Non-cooperation may lead to termination of the business relationship as a last resort.

9. ILO Reference

International Labour Standards on Child labour

<https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/child-labour/lang--en/index.htm>

International Labour Standards on Forced labour

<https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/lang--en/index.htm>

10. Compliance with Bill S-211

This Compliance Policy outlines the guidelines and expectations regarding the Fighting Against Forced Labour and Child Labour in Supply Chains Act, also known as Bill S-211.

This policy is designed to ensure that our company and its supply chain partners operate in accordance with the Act's provisions to eradicate forced labor and child labor.

Stormtech commits to full compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. We recognize the importance of eradicating forced labor and child labor from our operations and supply chains.

11. Supplier Engagement:

a. Due Diligence:

Stormtech will conduct due diligence to assess the risk of forced labor and child labor in its supply chain.

Suppliers will be required to provide detailed information on their manufacturing facilities, audits, and policies related to forced labor and child labor.

b. Documentation Requirements:

Suppliers must submit on yearly basis, individual factory documentation, including addresses, contact information, and details of products or services produced at each location.

Audits conducted in the last 12 months focusing on labor practices, with corrective actions taken if necessary, must be provided.

Suppliers are expected to submit policies and procedures related to forced labor and child labor, including recruitment practices and age verification.

c. Timely Submission:

Suppliers are expected to submit the requested documentation within the specified timeframe communicated by Stormtech.

12. Consequences of Non-Compliance:

Non-compliance with the provisions outlined in this policy may result in a reassessment of our business relationship with the supplier, up to and including termination of the contract.

13. Continuous Improvement:

Stormtech is committed to continuous improvement in its compliance efforts. We will regularly review and update this policy to reflect changes in legislation and best practices.

14. Reporting Violations:

Any employee, contractor, or supplier who becomes aware of a potential violation of this policy is encouraged to report the violation through established reporting channels. Any actual or potential violations of Stormtech's Social Standards, including forced labor, may be reported directly to Stormtech at compliance@stormtech.ca

15. Conclusion:

Compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act is not only a legal obligation but also a reflection of Stormtech's commitment to social responsibility and ethical business practices. We expect the cooperation of all employees and supply chain partners in upholding these principles.

This Compliance Policy will be regularly reviewed and updated as necessary.