

Child Labor Remediation Policy

Shamrock Foods Company and Shamrock Farms Company (collectively, “Shamrock”) are committed to preventing and addressing the use of child labor and protecting young persons.

Shamrock does not employ any person under the age of 18 and expressly prohibits the hiring of persons under the age of 18. It is Shamrock’s policy that there shall be no new recruitment of child or young labor for employment by Shamrock or at Shamrock’s workplaces.

A child is any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply. A young person is any worker over the age of a child as defined above and under the age of 18.

Child labor is any work by a child younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child’s or young person’s education or to be harmful to the child’s or young person’s health or physical, mental, spiritual, moral or social development. The following are examples of hazardous work: work which exposes children to physical, psychological, or sexual abuse; work underground, underwater, at dangerous heights, or in confined spaces; work with dangerous machinery, equipment, and tools, or which involves the manual handling or transport of heavy loads; work in an unhealthy environment which may, for example, expose children to hazardous substances, agents, or processes, or to temperatures, noise levels, or vibrations, damaging to their health; and work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.

If child labor is found at a Shamrock workplace, Shamrock would develop a corrective action and remediation plan, which should include immediate protection of any children and young workers. Shamrock would ensure that children stop work immediately, are provided a clear explanation of immediate next steps and are supported through the process by an appropriate member of Shamrock’s human resources team. Shamrock would undertake a full review of the site’s personnel records and create a list of all potential child laborers and young workers, ensure that all children identified have access to safe and adequate housing and meals, and are adequately protected from harm until they can be reunited with their family.

Shamrock expects its suppliers to undertake credible due diligence and monitor their operations to ensure that their sites and supply chains are free from child labor and young people employed in hazardous work.

If child labor is found at a site supplying products to Shamrock, the supplier must notify Shamrock. Shamrock would engage with the supplier or site and any appropriately qualified organization to develop a solution that prevents further harm and supports the long-term interests of the children involved. Suppliers and manufacturing sites are expected to fully support all stages of the investigation and remediation process. The supplier must develop a corrective action and

remediation plan, which should include immediate protection of any children and young workers. Suppliers must ensure that children stop work immediately, are provided a clear explanation of immediate next steps and are supported through the process by an appropriate member of the supplier's human resources team. Suppliers must undertake a full review of all site personnel records and create a list of all potential child laborers and young workers, ensure that all children identified have access to safe and adequate housing and meals, and are adequately protected from harm until they can be reunited with their family.

Suppliers must not (i) remove, dismiss or conceal any of the suspected or confirmed child labors and/or young workers without prior notification to Shamrock, (ii) threaten the children or their families, or interfere with any part of the assessment or remediation; or (iii) conceal or falsify any documentation. Such actions will be considered by Shamrock as evidence that the supplier and site are not committed to effective child labor remediation and are in breach of Shamrock's policies and procedures.