**IMPORTER’S FORCED LABOUR POLICY**

**PURPOSE**

[EMPLOYER'S NAME] and its affiliates are dedicated to complying with all relevant US import laws and regulations. This includes adherence to the prohibition on importing goods made, in whole or in part, by forced, indentured, or convict labor, including the use of child labor.

In accordance with US law, any merchandise produced fully or partially using labor from North Korea, or from China’s Xinjiang Uyghur Autonomous Region, or by entities listed under the Uyghur Forced Labor Prevention Act (UFLPA), is presumed to be produced by forced labor and is therefore prohibited from entering the United States.

As an importer of [DESCRIPTION OF MERCHANDISE], [EMPLOYER'S NAME] is responsible for ensuring that all our import transactions comply with the relevant legal and regulatory standards, particularly regarding the forced labor prohibition. Failing to demonstrate reasonable care in complying with these laws could result in merchandise being detained or seized by US Customs and Border Protection (CBP). This could not only harm our business operations and damage our reputation, but also expose the [EMPLOYER'S NAME] to severe civil or criminal penalties.

Ensuring compliance with forced labor import regulations is both a key ethical obligation and a vital aspect of maintaining our business success and brand integrity.

[EMPLOYER'S NAME] ensures compliance with all applicable Vermont laws and regulations related to forced labor and supply chain transparency.

**STATEMENT**

[EMPLOYER'S NAME] strictly prohibits the use of forced labor in its international supply chain and is committed to working only with suppliers that comply with this policy. The [EMPLOYER'S NAME] does not engage with any supplier that uses or is suspected of using forced labor, including labor in its own supply chains. We consistently evaluate and address the risk of forced labor, including forced North Korean labor and any labor subject to the Uyghur Forced Labor Prevention Act (UFLPA), within our supply chain.

Investigation and corrective action

If forced labor is suspected or identified at any point in our supply chain, [EMPLOYER'S NAME] will initiate an immediate investigation. Should the investigation confirm the use of forced labor, we will either require the supplier to implement corrective actions or sever the business relationship as necessary. Our approach ensures that any use of forced labor is addressed appropriately.

Due diligence measures

As part of our commitment to preventing forced labor, [EMPLOYER'S NAME] employs a range of due diligence measures, which include:

1. Supplier screening: We evaluate both new and existing suppliers for forced labor risks using tools such as questionnaires, site visits, and additional verification methods.
2. Screening against government lists: We review our prospective purchases against US Department of Labor lists, the US State Department lists concerning North Korean labor, and the UFLPA Entity List to identify risks associated with forced labor.
3. Audits: We conduct both announced and unannounced audits of our suppliers' operations, which may be carried out by in-house or third-party auditors.
4. Supplier code of conduct: We require all suppliers to adhere to a Supplier Code of Conduct, which prohibits the use of forced labor in their operations, mandates a system to verify the eligibility of all workers, and requires reporting of violations.
5. Contractual terms: Our contracts and purchase orders explicitly prohibit forced labor and require suppliers to certify that goods provided to us are not produced with forced labor. These agreements also allow us to terminate contracts or require corrective actions if forced labor is discovered.

Supplier accountability

We include provisions in our buying agency agreements to ensure that agents involved in sourcing merchandise also comply with forced labor prohibitions. [EMPLOYER'S NAME] expects full cooperation from our suppliers in investigations related to forced labor and will take immediate action if such practices are identified.

Training and commitment

Senior management is fully committed to sourcing products in compliance with all laws and regulations concerning forced labor. Management will ensure that sufficient resources are allocated for maintaining internal controls and training employees and agents on forced labor prohibitions. We also aim to extend this training to our direct suppliers and, where possible, suppliers further along in the supply chain.

Internal controls

Our internal controls and procedures for preventing forced labor are outlined in our [Import Compliance Manual/[OTHER DOCUMENT]]. Senior management will ensure that adequate resources are allocated to implement and maintain these measures, ensuring compliance with this critical policy.

**POLICY MAINTENANCE AND EXECUTION**

The [DEPARTMENT NAME] is responsible for overseeing the implementation and maintenance of this policy, ensuring that the [EMPLOYER'S NAME]'s forced labor due diligence processes are functioning effectively. The [DEPARTMENT NAME] will regularly assess the effectiveness of these procedures [on a regular basis/[OTHER TIME PERIOD]] and make necessary updates to the policy and procedures. Senior management will support the [DEPARTMENT NAME] with the resources needed to effectively implement and enforce this policy.

**POLICY DISTRIBUTION**

The [DEPARTMENT NAME] will provide all new employees with a copy of this policy as part of their orientation. Additionally, the [DEPARTMENT NAME] will ensure that all new buying agents receive a copy of this policy. The [DEPARTMENT NAME] will distribute this policy annually to all employees [and buying agents], or as otherwise instructed by the [EMPLOYER'S NAME]’s [POSITION]. A copy of this policy will also be available on the [EMPLOYER'S NAME]’s intranet [and website] ([HYPERLINK]).

**TRAINING**

Senior management will ensure that all employees with environmental, social, and governance (ESG) responsibilities, as well as those involved in the supply chain, including the acquisition and importation of merchandise from foreign suppliers, receive adequate training on this policy. The training will ensure that the [EMPLOYER'S NAME] does not knowingly purchase or import any merchandise made wholly or in part by forced labor. Personnel who will receive this training include, but are not limited to, employees in our [DEPARTMENT NAMES] and buying agents engaged by the [EMPLOYER'S NAME].

Additionally, the [EMPLOYER'S NAME] will make efforts to provide training on forced labor prohibitions to its direct suppliers and, where possible, extend the training to suppliers beyond the first tier in the supply chain.

The [DEPARTMENT NAME] is responsible for coordinating and conducting this training.

**ACKNOWLEDGEMENT OF RECEIPT AND REVIEW**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (employee name), acknowledge that on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (date), I received and reviewed a copy of [EMPLOYER'S NAME]’s [NAME OF POLICY]. I understand that it is my responsibility to familiarize myself with the policy and adhere to its terms.

I also acknowledge that this policy is not intended to create an employment contract or alter my at-will employment status, unless otherwise specified in a written agreement signed by an authorized representative of [EMPLOYER'S NAME]. Any delay or failure by [EMPLOYER'S NAME] to enforce the provisions of this policy does not constitute a waiver of its rights to enforce them in the future.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date