



COUNTY OF NORTHERN LIGHTS

POLICY

FAIR LABOUR PRACTICES

CREATED: 2/9/2025

REVISED:

TOTAL PAGES: 2

PURPOSE

The purpose of this procedure is to establish guidelines for fair labor practices.

SCOPE

This document is applicable to all employees.

GUIDELINES

Measures in Place to Prevent Child Labor

County of Northern Lights must develop an awareness and understanding of the causes and consequences of child labor to help take action against child labor. County of Northern Lights must determine whether or not child labor is a problem within the business. Examples of measures companies should put in place to prevent child labor include:

- Be aware of countries, regions, sectors, economic activities where there is a greater likelihood of child labor and respond accordingly with policies and procedures.
- Develop and implement mechanisms to detect child labor.
- Use adequate and verifiable mechanisms for age verification in recruitment procedures.
- Exercise influence on subcontractors, suppliers, and other business affiliates to combat child labor
- Have remediation procedure in place if child labor is discovered.

Discrimination is Prohibited

County of Northern Lights should eliminate discrimination in the workplace (employment and occupation), including where it may occur in the terms and conditions of employment. Discrimination in employment and occupation means treating people differently or less favorably because of characteristics that are not related to their merit or the inherent requirements of the job, such as ethnicity, age, race, etc. Discrimination can arise in a variety of work-related activities, including access to employment, particular occupations, promotions and to training and vocational guidance.

Suppliers Adherence

County of Northern Lights must ensure subcontractors and suppliers do not use forced labor. Steps should be taken to ensure forced labor in all forms is prohibited in all areas of the value chain in our operations. This includes ensuring suppliers and subcontractors are using fair labor practices and eliminating any risks for forced labor conditions. Mechanisms for this include supplier or subcontractor evaluations, site visits, etc.

Employees are Fairly Compensated

County of Northern Lights must pay employees a wage that is in-line with regional standards for average wages. Adequate compensation is intended to enable employees to support their families, keeping in mind the average family size and basic needs like housing, food, healthcare and education. This program requirement is not asking for County of Northern Lights pay-scales or individual salaries, only that County of Northern Lights ensures fair wages are provided for employee work.

Adequate Working Conditions

All employees are provided adequate working conditions. County of Northern Lights must ensure that adequate working conditions are ensured for all employees. Conditions of work include wages and other forms of compensation, working time, rest periods, holidays, disciplinary and dismissal practices, maternity protection and welfare matters such as safe drinking water, sanitation, canteens and access to medical services.

Many of the conditions of work are set by national laws and regulations or by legally binding agreements between those for whom work is performed and those who perform work. County of Northern Lights determines many of the



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conditions of work. Conditions of work greatly affect the quality of life of workers and their families and also economic and social development.

Fair and appropriate consideration should be given to the quality of conditions of work. County of Northern Lights should provide decent conditions of work with regard to wages, hours of work, weekly rest, holidays, health and safety, maternity protection and ability to combine work with family responsibilities.

TRAINING

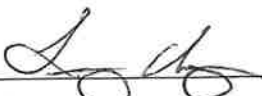
Management is trained on the definition of forced labor. This protocol is based on industry best practice guidance from the United National Global Compact (UNGC) principles, ISO 26000 Guidance on Social Responsibility, and guidance from the Organization for Economic Co-Operation and Development. It is encouraged to review these industry best practice documents, as well as any applicable regional laws or legislation surrounding our approach and/or requirements for addressing fair labor practices in County of Northern Lights operations and supply chains.

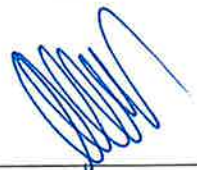
County of Northern Lights should ensure that all management members have a full understanding of what forced labor is. Forced or compulsory labor is any work or service involuntarily provided from any person under threat of penalty. Forced labor can take a number of forms. Situations of forced labor are generally characterized by a lack of consent to work (the route into forced labor) and the menace of a penalty (the means of keeping someone in forced labor). The following are forms of forced labor:

- Slavery
- Bonded labor or debt bondage
- Child labor
- Physical abduction or kidnapping
- Sale of a person into the ownership of another
- Physical confinement in the work location (in prison or in private detention)
- The work or service of prisoners
- Labor for development purposes
- Work required to punish opinion or expression of views
- Exploitative practices such as forced overtime
- The lodging of deposits (financial or personal documents) for employment
- Physical or psychological (including sexual) violence
- Full or partial restrictions on freedom of movement
- Withholding and non-payment of wages
- Deprivation of food, shelter, or other necessities
- Deception or false promises
- Induced indebtedness
- Threats to denounce workers in an irregular situation to the authorities

Employees are trained on non-discrimination practices. Employees must be provided training on non-discrimination policies and practices, including disability awareness.

Employees are provided with access to skills and/or development training. County of Northern Lights should provide all workers with access to skills development, training and apprenticeships, and opportunities for career advancement on an equal and non-discriminatory basis.



Chief Elected Official

Chief Administrative Officer