

CANADA'S FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

CHUDLEIGH'S LTD. S-211 REPORT WORKSHEET FOR THE FINANCIAL YEAR ENDED OCTOBER 31, 2023.

S-211 REPORTING REQUIREMENTS FOR THE REPORTING ENTITY/ENTITIES	Draft Outline of Information to be Provided
Legal Corporate Name of Reporting Entity/Entities	Chudleigh's Ltd.
Is the Report for a Single Entity or is it a Joint Report for Multiple Entities?	Single
Introduction and Identity	
<p>Steps Taken to Prevent and to Reduce the Risks of Forced Labour and Child Labour</p> <p>Report on the steps the reporting entity has taken <i>during its previous financial year</i> to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.</p>	<p>Updated Vendor Certification process to include the vendors policy on Forced/Child Labour.</p> <p>Chudleigh's participates in the SMETA audits</p>
Structure, Activities and Supply Chains	<p>Structure:</p> <p>Document Management</p> <p>Activities:</p> <p>Internal Audits</p> <p>Supply Chains: Raw Material Procurement</p>

<p>S-211 REPORTING REQUIREMENTS FOR THE REPORTING ENTITY/ENTITIES</p>	<p>Draft Outline of Information to be Provided</p>
<p>Policies and its Due Diligence Processes in Relation to Forced Labour and Child Labour</p>	<p>Policies: All vendors must have an active Forced Labour policy and be aligned with Chudleigh's policy</p> <p>Due Diligence Processes: Annual request to update policy on file. Vendor profile in system uploaded with documents</p>
<p>The Parts of its Business and Supply Chains That Carry a Risk of Forced Labour or Child Labour Being Used and the Steps Taken to Assess and Manage That Risk</p>	<p>Identification of parts of its business and supply chains that carry a risk of forced labour or child labour:</p> <p>NA</p> <p>Risk Assessment/Management Steps Taken:</p> <p>Vendor compliance</p>
<p>Any Measures Taken to Remediate any Forced Labour or Child Labour</p>	<p>Has Chudleigh's Ltd. found or become aware of any forced labour and/or child labour in its business operations or supply chains? If so, were any measures taken to remediate the forced labour and/or child labour?</p> <p>Chudleigh's has not become aware of any forced labour withing its business or supply chain models.</p>
<p>Any Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families That Results From any Measure Taken by the Reporting Entity to Eliminate the Use of Forced Labour or Child Labour in its Activities and Supply Chains</p>	<p>Has Chudleigh's Ltd. taken any measures taken to remediate the loss of income to the most vulnerable families that results from any measure that it had taken to eliminate the use of forced labour or child labour in its activities and supply chains?</p> <p>Chudleigh's has not become aware of any forced labour withing its business or supply chain models.</p>
<p>The Training Provided to Employees on Forced Labour and Child Labour</p>	<p>Details, scope and cadence of employee, management and Board of Directors training on forced labour and child labour. Is training provided to suppliers?</p> <p>Training of employees will be managed within two formats.</p> <ol style="list-style-type: none"> 1. NEW employees will receive training during orientation. 2. Current employees will use our Alchemy Training program.

<p>S-211 REPORTING REQUIREMENTS FOR THE REPORTING ENTITY/ENTITIES</p>	<p>Draft Outline of Information to be Provided</p>
<p>How Does the Reporting Entity Assesses its Effectiveness in Ensuring that Forced Labour and Child Labour are not Being Used in its Business and Supply Chains</p>	<p>Starting Point: Does Chudleigh’s Ltd. have a program in place to assess the effectiveness of its other compliance programs?</p> <p>Add to our internal audit process in collaboration with BRCGS audit requirements.</p> <p>How did Chudleigh’s Ltd. assess its effectiveness in ensuring that forced labour and child labour are not being used in its business operations and supply chains</p> <p>Annual vendor audits – documentation control and supply chain review</p>
<p>Identify the Governing Body(ies) for the Reporting Entity/Entities</p>	<p>Dean Chudleigh</p>
<p>Will this Governing Body will be approving the Report?</p>	<p>YES</p>
<p>List Name of the Member of the Governing Body designated to provide the required attestation and to sign the S-211 Report</p>	<p>Dean Chudleigh</p>
<p>Will the same person complete the Questionnaire? If not, list name of the person authorized to complete the Questionnaire.</p>	<p>NO. Janette Brito</p>



Company Policy on Prohibition of Forced and Child Labour

Scope: This policy outlines our stance against forced and child labour and affirms our dedication to ethical business practices.

We at Chudleigh's are committed to conducting our business in a manner that respects the rights and dignity of all people. We believe that all labour must be voluntary, and we strongly oppose all forms of forced and child labour. Our commitment is reflected in the following policy:

1. **Prohibition of Forced Labour:** We do not use any form of forced, bonded, indentured, or prison labour. All work will be voluntary, and employees shall be free to leave work or terminate their employment with reasonable notice.
2. **Prohibition of Child Labour:** We adhere to the minimum age provisions of applicable laws and regulations. We support the use of legitimate workplace apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs.
3. **Workplace Conditions:** We provide a workplace environment that is safe, hygienic, and humane. All employees shall be treated with respect and dignity and shall not be subject to any form of physical, sexual, psychological, or verbal harassment or abuse.
4. **Working Hours and Compensation:** We comply with all applicable laws and industry standards relating to working hours and compensation, including those pertaining to minimum wages, overtime hours, piece rates, and other elements of compensation.
5. **Freedom of Association:** We respect the rights of employees to associate freely, seek representation, and engage in bargaining as permitted by law.
6. **Monitoring and Compliance:** We will regularly monitor our supply chain to ensure compliance with this policy. We will take immediate and appropriate action if non-compliance is detected.
7. **Reporting Violations:** Employees and external stakeholders are encouraged to report any concerns or violations of this policy. We ensure that all reports will be taken seriously and investigated promptly and thoroughly.
8. **Continuous Improvement:** We are committed to continuously reviewing and improving our policies and procedures to ensure they are effective in preventing forced and child labour.

This policy applies to all employees, contractors, suppliers, and other business partners of Chudleigh's. Any violation of this policy will result in appropriate disciplinary action, up to and including termination of employment or business relations.

Approved by: Dean Chudleigh, Owner
Effective Date: May 31, 2024
Policy Number: PL0001

Dean Chudleigh
Dean Chudleigh (May 30, 2024 10:51 EDT)

