



## POL – *Fighting Against Forced Labour and Child Labour in Supply Chains Act* – Report for Year Ended December 31, 2023

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### 1.0 Purpose

1. Jokey North America (**JNA**) respects all human rights, and employees, customers, and suppliers are treated fairly and with respect. We condemn and reject all forms of modern slavery, such as the exploitation of people in the form of forced labour, human trafficking, debt bondage, and any form of physical or psychological abuse. Child labour and the exploitation of children and adolescents is rejected.
2. This report (the “**Report**”) has been developed to address the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) and applies in conjunction with and should be read together with other policies that affect the provision of services to our customers and visitors. This report summarizes the steps that Jokey has taken in the financial year ended December 31, 2023, to reduce the risk and prevent the use of child labour or forced labour at any step in the production of goods, in Canada or elsewhere, or of goods imported into Canada.

### 2.0 Scope

1. This report applies to all employees, contractors, volunteers and other applicable third parties.
2. The terms “we”, “us,” “our,” “company,” “JNA,” “JCAN,” and “Jokey” as used in this report refer collectively to Jokey North America Inc., unless context suggests otherwise.

### 3.0 Statement of Organizational Commitment

1. JNA is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code.
2. JNA understands that obligations under Bill S-211 and its standards do not substitute or limit its obligations under the Ontario Human Rights Code or any other law.
3. Our human rights policies are consistent with the principles of pragmatism, sustainability, social awareness, appreciation, and honesty.

### 4.0 Structure, Activities, and Supply Chains

Issue Date: May 31, 2023

Approved By: Human Resources Manager

Revision Dates:

Page: 1 of 11



## POL – *Fighting Against Forced Labour and Child Labour in Supply Chains Act* – Report for Year Ended December 31, 2023

---

### 4.1 Jokey Group's Structure and Activities

1. Jokey Inc., is a corporation. It is a leading manufacturer of plastic packaging; producing high-quality injection moulded plastic buckets and lids -- for both food and non-food items -- for customers globally. Jokey was originally founded in Fährnichstüttem, Germany, in 1968. Now, the Jokey Group has expanded internationally to 14 plants in 11 different countries with 2,300 employees, and the head office being located in Wipperfürth, North Rhine-Westphalia.
  
2. At the Jokey Group we value a down-to-earth attitude, quality and competence, respect and honesty, and ecological and social responsibility. We believe that entrepreneurial success requires a prudent attitude towards people and nature. Our vision is to become climate neutral by 2030, starting with numerous small opportunities to save energy and material, to extending to large-scale investments in efficient and resource-saving technologies.  
  
To learn more about the Jokey Group, visit the [Jokey Website](#).
  
3. This report is being submitted with respect to the Goderich location located at 150 Mitchell St, Goderich ON. This is currently the only Jokey Group plant located in North America. We have 115 employees and we hire both locally and internationally. We pride ourselves on being a living wage employer (outlined further in subsection 5.2.1.b).

### 4.2 Supply Chains

1. JNA chooses suppliers and partners carefully, and we give preference to those who share our socially and environmentally conscious practices. Suppliers are selected and evaluated beyond economic criteria.
  - a. We also look closely at compliance with human rights and environmental protection.
  
2. JNA has over 200 Suppliers, the majority of which are located in Canada and USA, but we have a small percentage of suppliers in Europe and China as well. Our main Suppliers provide a large range of goods, such as:
  - a. Raw materials (polypropylene)
  - b. Injection Mould Labels (IML)
  - c. Packaging (cardboard, bags, pallets, tape...)
  - d. Machines, molds, and spare parts

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**Issue Date:** May 31, 2023  
**Revision Dates:**

**Approved By:** Human Resources Manager  
**Page:** 2 of 11

---



POL – *Fighting Against Forced Labour and Child Labour in Supply Chains Act* – Report for Year Ended December 31, 2023

---

## 5.0 Policies and Due Diligence Process

### 5.1 Related Policies

1. Jokey Group Code of Conduct:
  - a. We pride ourselves that pragmatism, sustainability, social awareness, appreciation, and honesty are embedded in the foundations of our culture and organization. Lawful and responsible conduct is indispensable to the performance of our daily work and to the success of our business.
  - b. Our Code of Conduct (which applies to all employees, managers, and directors of the Jokey Group) aims to act responsibly long-term and make a positive contribution to society by integrating the principles contained within the Jokey Group Code of Conduct into our daily work.
  - c. Our Code of Conduct ensures that human rights are respected and we reject all forms of modern slavery, as listed in section 1.0.1.
  - d. Our Code of Conduct guarantees that we comply with all labour laws and other relevant regulations.
    - i. To learn more, visit [Jokey's Code of Conduct](#).

2. GKV Code of Conduct

- a. The GKV (German Association of Plastic Converters) is an organization in Germany representing companies in the plastic processing industry.
- b. The GKV Code of Conduct ("CoC") is a voluntary agreement, through which member companies wish to guarantee the observance of global demands on ethical and moral actions. The companies recognizing the GKV CoC regularly inform company members (specifically suppliers) on the ethical goals and behavior principles of this Code of Conduct.
  - i. This CoC outlines several areas of protection, regulations, and guidelines, such as an antitrust law (company is committed to a fair competition), human rights guidelines (rights are supported explicitly and consistently), and violence and harassment principles (disapproving violence.) If companies do not fulfil all of

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Issue Date: May 31, 2023  
Revision Dates:

Approved By: Human Resources Manager  
Page: 3 of 11

---



**POL – Fighting Against Forced Labour and Child Labour in Supply Chains Act – Report for Year Ended December 31, 2023**

---

- the certification requirements, their membership with the GKV will be withdrawn.
- ii. This also means promoting fair and sustainable standards while dealing with suppliers and customers, as well as own company personnel.
  - c. The GKV CoC adheres to the valid laws and standards of the respective countries it is active in; it takes guidance from the general ethic values and principles, especially integrity, righteousness, as well as human dignity.
  - d. The GKV CoC supports all internationally recognized human rights. Equally, in the case of disciplinary measures, all company personnel are to be treated with dignity and respect (such measures are only taken place in accordance with the current national and international standards and internationally recognized human rights.)
  - e. The GKV makes sure that company members must not be forced to work through means of violence or intimidation, as any kind of forced labour, debt bondage, slave work or slavery in similar situations, are rejected. Child labour and any kind of exploitation of children and adolescents is rejected, and the corresponding laws are adhered to.
    - i. To learn more, visit the [GKV Code of Conduct](#)

## 5.2 Supplier Onboarding

- 1. Jokey Group Supplier Charter
  - a. Having signed up for the GKV Code of Conduct in 2012, the Jokey Group has formalized its values in the General Principles of Conduct. The economic, social, and environmental requirements for sustainable development are fundamental elements in the strategy of the Jokey Group. For this reason, Jokey developed a Charter (the “**Charter**”) for suppliers to take part in this process within their own sphere of action.

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**Issue Date:** May 31, 2023  
**Revision Dates:**

**Approved By:** Human Resources Manager  
**Page:** 4 of 11

---



POL – *Fighting Against Forced Labour and Child Labour in Supply Chains Act* – Report for Year Ended December 31, 2023

---

- b. The Charter guarantees that we are a living wage employer, meaning that we pay all direct and indirect employers/employees a living wage based on our region of operation.  
For more information about living wage, visit [ontariolivingwage.ca](http://ontariolivingwage.ca).
  - i. It also guarantees that they are free from any form of discrimination, and that, either indirectly or directly, suppliers should, under no circumstance, resort to the use of child labour or forced labour. Furthermore, they ensure the traceability of raw materials and components for the provision of services and the product.
- c. The Purchasing Department at JNA may be led to take measures they deem necessary to ensure full compliance with the Charter, notably by sending out questionnaires or conducting or having conducted specific audits at the suppliers' and sub-contractors' premises.

2. Vendor Information Form

- a. When JNA acquires a new supplier, an updated Vendor Information Form must be completed.
- b. This form requires all vendors to complete and sign a:
  - i. Labour Law and Compliance Agreement – *“The manufacturer of the product confirms that they comply with all applicable labour laws, and shall continue to abide by the required rules and regulations.”*
  - ii. Prohibition of Forced Labour Agreement – *“The manufacturer of the product shall confirm that they do not engage in or permit the use of forced or compulsory labour, per International Labour Conventions (ILO) C29 and C105 (Forced Labour Convention, 1930) at its facilities.”*
  - iii. Prohibition of Child Labour Agreement – *“The manufacturer of the product confirms that they do not operate their facilities inconsistent with the intent of ILO Convention 182 (prohibit and eliminate the worst forms of child labour, i.e. slavery, trafficking, forced labour... any work that is likely to harm the health/safety or children.)”*

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Issue Date: May 31, 2023  
Revision Dates:

Approved By: Human Resources Manager  
Page: 5 of 11

---



POL – *Fighting Against Forced Labour and Child Labour in Supply Chains Act* – Report for Year Ended December 31, 2023

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## 6.0 Steps Taken Last Year

1. Jokey has several policies and practices in place to reduce the risks and prevent child labour and forced labour within our supply chain, such as:
  - a. Jokey Group Code of Conduct (subsection 5.1.1)
  - b. GKV Code of Conduct (subsection 5.1.2)
  - c. Employee rights and company guidelines (subsection 9.2)
  - d. Living wage employer (subsections 5.2.1.b and 9.1.3)
    - i. These policies and practices apply to all members of JNA and support our commitment of upholding human rights.
2. In our last financial year, we took the following steps to prevent and reduce the risk of child labour and forced labour in our business:
  - a. Discussing the Act and its requirements with administrative staff and applicable committees, and giving light to our human rights policies.
  - b. Carefully reviewing potential suppliers before integrating them into our supply chain.
  - c. Consistently reviewing child labour and forced labour policies and ensuring they are up-to-date and accurate.
  - d. Implementing signed agreements that fight/forbid the use of child labour and forced labour, during the orientation process.
  - e. Integrating a work-life balance for all employees (voluntary overtime, Right to Disconnect Policy\*)

\*The Right to Disconnect Policy establishes employees' rights to disengage from work without having to engage in work-related communications, such as emails, phone calls, and messages, outside of normal working hours.

## 7.0 Identifying and Managing Forced Labour and Child Labour Risks

### 7.1 Identified Risks

1. JNA used the supplier onboarding forms (listed in subsections 5.2.1 and 5.2.2), and analyzed Suppliers based on region and material, to identify any risks of child labour and forced labour. Through this process, we identified that our

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**Issue Date:** May 31, 2023  
**Revision Dates:**

**Approved By:** Human Resources Manager  
**Page:** 6 of 11

---



## POL – Fighting Against Forced Labour and Child Labour in Supply Chains Act – Report for Year Ended December 31, 2023

main Suppliers have a low-risk of modern slavery, however, a small percentage of Suppliers have a higher risk based on their country and type of goods.

2. The criteria used for this country-level risk assessment includes: (i) population of current modern slavery, and (ii) countries commitment of implementing human rights policies.

### 7.2 Assessing Effectiveness

1. The Jokey Group is committed to guarantee that child labour and forced labour are not used in our business or supply chain. As stated throughout this report, JNA has incorporated numerous human rights policies and regulations in our business. However, to date, no action has been taken to assess the effectiveness of these measures.
2. JNA regularly reviews our Supplier Code of Conduct, our Charter, and our Vendor Information forms prior to engaging suppliers.
3. In pursuit of JNA's dedication to ensure that modern slavery is not used in our supply chain or business, we will continue to monitor applicable laws in relation to this Act.

### **8.0 Remediation Measures including Remediation of loss of Income**

1. As Jokey has not identified any incident of modern slavery in the last financial year in our supply chain, no action has been taken to remediate an incident of child labour or forced labour, or to remediate any loss of income resulting from eliminating the use of child labour or forced labour.

### **9.0 Training**

#### 9.1 Recruiting, Hiring and Employees

1. JNA rejects any kind of forced labour, child labour, modern slavery, or similar situations, and informs employees/members of our regulations.
  - a. Regulations are outlined in sections 4.1.4, 5.0, 6.0, and 9.2.
2. JNA vows that extra work must be done on a voluntary basis. Employees and employers can agree, in writing, to work over 48 hours a week. As per the Employment Standards Act, 2000 (ESA), employees are not required to agree

**Issue Date:** May 31, 2023

**Approved By:** Human Resources Manager

**Revision Dates:**

**Page:** 7 of 11



## POL – Fighting Against Forced Labour and Child Labour in Supply Chains Act – Report for Year Ended December 31, 2023

to work extra hours. If employees agree to work excess hours, they cannot work more than the number of hours shown in the agreement.

3. JNA is committed to providing living wages and working hours, that comply with national legislation, for all employees. Our working hours correspond to valid national laws, industry standards, or relevant ILO conventions.

### 9.2 Training

1. JNA is committed to training its staff and volunteers, all persons who participate in developing the organizations policies, and all persons who provide goods, services or facilities on behalf of the organization.
2. All persons in subsection 6.3.1 will be trained as soon as practicable.
3. JNA ensures that employees have read the latest version (9.0) of the Employment Standards Act (ESA) poster and requires a signed agreement during the orientation process.
  - a. The ESA poster outlines the set minimum standards for most workplaces in Ontario. This includes public holiday entitlement, hours of work and overtime, vacation time and pay, etc... This mainly covers forced labour regulations.
    - i. Employers are prohibited from penalizing employees in any way for exercising their rights under the ESA.
4. JNA ensures that employees have read the latest version of the GKV Code of Conduct (outlined further in subsection 5.1.2) and requires a signed understanding during the orientation process. This covers both child labour and forced labour regulations.
5. JNA will maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

### 10.0 Assessing Effectiveness

1. JNA welcomes feedback on how the company can improve human rights policies, specifically in relation to child labour and forced labour. Customer

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**Issue Date:** May 31, 2023  
**Revision Dates:**

**Approved By:** Human Resources Manager  
**Page:** 8 of 11

---



**POL – Fighting Against Forced Labour and Child Labour in Supply Chains Act – Report for Year Ended December 31, 2023**

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feedback will help us identify barriers and respond, as well as assess the effectiveness of our policies and procedures as outlined in this report.

2. All feedback, including complaints can be addressed with the Human Resources department via mail, phone, or email. A response can be expected within fourteen (14) days of receipt of the feedback.
3. Contact information as follows:  
Mail: 150 Mitchell Street Goderich, ON N7A 3X8  
Phone: 519-524-9890 ext. 221  
Email: [rebecca.ferguson@jokey.com](mailto:rebecca.ferguson@jokey.com)
4. Questions about this report should be referred to the Human Resources Manager.

**11.0 Modifications and Review to This or Other Reports**

1. JNA is committed to developing employee and customer service policies that respect and promote human rights in the workplace. Therefore, no changes will be made to this report before considering the impact on employees, visitors, suppliers, and customers. Any policy of JNA that does not respect and promote the principles of human rights will be modified or removed.
2. This report and all relevant policies will be reviewed as needed from time to time to comply with our obligations.

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**Issue Date:** May 31, 2023  
**Revision Dates:**

**Approved By:** Human Resources Manager  
**Page:** 9 of 11

---



**POL – Fighting Against Forced Labour and Child Labour in Supply Chains Act – Report for Year Ended December 31, 2023**

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In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Jokey North America Inc.

A handwritten signature in black ink, appearing to read "P. McInnis", written over a horizontal line.

**Paul McInnis**

*President, JNA*

May 31, 2023

Date

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**Issue Date:** May 31, 2023  
**Revision Dates:**

**Approved By:** Human Resources Manager  
**Page:** 10 of 11

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POL – *Fighting Against Forced Labour and Child Labour in Supply Chains*  
Act – Report for Year Ended December 31, 2023

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**Issue Date:** May 31, 2023  
**Revision Dates:**

**Approved By:** Human Resources Manager  
**Page:** 11 of 11

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