

CHILD LABOR POLICY

Our company upholds a high standard of ethical conduct, including compliance with all laws and regulations related to child labor. We strictly prohibit the use of child labor as defined by any one under the age of 18 in our field operations to include production, manufacturing, and supply chain activities in our plants. This prohibition extends to all employees, and contractors working with HP Hood.

Employment restrictions in our corporate offices include those employees between the ages 14-16 restricted hours (no full time work & no evening/night work) and types of work (those under 18 are prohibited from hazardous occupations, thus light administrative office work only).

We require proof of age during the hiring of any new employee to ensure compliance with the Federal Fair Labor Standards Act (FLSA). Training of our managers occurs yearly to ensure compliance. Our HR team is responsible for monitoring compliance with this policy and conducting regular audits. Any employee whose employment is determined to be in violation of this policy will be immediately terminated. If there is any suspicion of under-age workers, employees may call the Ethics Hotline at 1-800-344-2918.

VERIFICATION OF AGE

HP Hood will verify that individuals who join the Company are of legal age to work in the position for which they are hired through the I-9 process in E-verify. From a remediation procedure standpoint, any underage individual found working in an HP Hood manufacturing environment or any underage individual working in an administrative capacity will be instructed to immediately cease work, be paid for hours worked, and the matter will be elevated to the site HR Director and the site leader, or their designee(s) in their absence. Site HR will contact the appropriate local authority and keep the underage individual safe until such time as they can be released to a parent or such local authority. Should this be the case, an investigation (gap analysis) shall be performed by HR to determine if any gaps exist that allowed a deviation from our employee age hiring requirements. All documentation or information related to a remediation procedure will be kept confidential and will only be disclosed to Hood personnel with a need to have such documentation or information.