

Child Labour Remediation Policy – for Supply Chain

This Policy is to set out the minimum standards we expect in terms of preventing and addressing the use of child labour in our supply chain. Lynn’s Country Foods (t/a Finnebrogue) are passionate about protecting the rights of young workers, both within our own workforce and in our supply chain.

Our Supplier Code of Conduct expressly prohibits the use of child labour. It further states that:

- The supplier shall comply with the national minimum age for admission to employment or work in any occupation which should not be less than the age for completing compulsory schooling and, in any case, not be inferior to 15 years old.
- The supplier shall neither recruit nor exploit children in any way. If children are found on production site, (except in a childcare room), the supplier shall seek a sensitive and satisfactory solution that puts the best interests of the child first.
- The supplier shall not employ young workers under the age of 18 years old at night, or in conditions which could jeopardize their health, their safety or their moral integrity, and/or which could harm their physical, mental, spiritual, moral or social development in accordance with ILO Convention 182.

We expect suppliers to undertake credible due diligence and monitor their operations to ensure that their sites are free from child labour and/or young people employed in hazardous work. If suppliers need support in understanding how to adequately monitor their employee details, Finnebrogue can provide support and training.

If child labour is found on one of our supplier sites, we commit to engaging with the supplier, the site and any appropriately qualified organisations to develop a solution that prevents further harm and supports the long-term interests of the children involved.

Suppliers are expected to fully support all stages of the investigation and remediation process, and cover any costs detailed in this policy or deemed necessary by Finnebrogue and an external support provider.

Following a report or discovery of child labour, the supplier and Finnebrogue will agree a corrective action and remediation plan with the site, which should include the following actions.

- Immediate protection of any children & young people found to be at risk
- Ensure that children stop work immediately
- Provide family and children with a clear explanation of immediate next steps and ensure they are supported through the process by either a Ethical Trading representative or an appropriate member of the supplier’s Human Resources team;
- Undertake a full review of all site personnel records and create a list of all potential child labourers and young workers;



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- Ensure that all children identified have access to safe and adequate housing, are provided with meals, and are adequately protected from harm until they can be reunited with their family;
- Inform Finnebrogue Ethical Lead via email: hadmin@finnebrogue.com

Finnebrogue will:

- Inform the appropriate relevant authorities, and seek support for the supplier through appropriate organisations
- Record all internal actions and communicate any additional requirements to the supplier.
- Have a remediation plan ready to use
- Support the supplier in developing any remediation actions designed to prevent new recruitment of child workers and enhance protection for young workers who remain in employment

In collaboration with Finnebrogue and any appropriate support provider, suppliers must:

- Explain the restrictions on working ages to the children and assure them that, if they wish, they can continue working after they reach the legal minimum working age.
- Take steps to understand what the children want and need in the short-term, and find out what options exist for re-starting education.
- Develop a remediation plan that:
 - Provides the opportunity for children to re-enter education and also protects their economic wellbeing, where possible in consultation with a relevant non-governmental organisation, and always in consultation with the child;
 - Ensures the child receives compensatory remuneration on a monthly basis until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example, the employment of an unemployed adult family member in place of the child).
 - Wages should be set at the national or regional legal minimum and paid irrespective of whether the child is supporting family members, or if the child is self-dependent;
 - Ensures the child has access to appropriate training, apprenticeships or counselling that may be required to support their ongoing wellbeing and development.
 - Guarantees the child has acceptable and safe accommodation and living conditions;
 - Documents all actions taken in support of remediation. Ongoing actions and monitoring.
- Regularly check and report back on the welfare of the child to ensure remediation plans are being delivered effectively. This can be undertaken by a local third party organisation if appropriate.



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Throughout this process, Finnebrogue would not expect suppliers to:

- Remove, dismiss or conceal any of the suspected or confirmed child labourers and/or young workers without prior notification to Finnebrogue;
- Threaten the children or their families, or interfere with any part of the assessment or remediation;
- Conceal or falsify any documentation.

Such actions may be considered by Finnebrogue as evidence that the supplier and site are not committed to effective child labour remediation, and are in breach of the Supplier Code of Conduct.



Andrew Nethercott
Managing Director
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