



Introduction

PureCircle Labor Policy emphasizes PureCircle's commitment to basic human rights as a core component of how PureCircle conducts business and works with its employees. This policy directly supports PureCircle's mission of producing the highest quality stevia product in a way that provides social, environmental, and economic benefits to the people and communities in which we do business. This policy applies to all PureCircle employees and suppliers.

Policy

It is PureCircle's policy to comply with all labor laws and to promote International Labor Organization (ILO) Decent Work Core Labor Standards. The core labor standards are drawn from the most fundamental of the ILO's labor conventions.

Purpose

PureCircle aims to uphold the following four core labor standards:

1. Freedom of association and the right to collective bargaining are respected. The right to organize and form employers' and workers' organizations is the prerequisite for sound collective bargaining and social dialogue. Sound collective bargaining practices ensure that employers and workers have an equal voice in negotiations and that the outcome will be fair and equitable.

PureCircle management should not impose any punitive actions — such as threatening, fining, suspending, or firing — against workers exercising their rights.

PureCircle management should not:

- Use intimidation, unreasonable searches, or police or military force to obstruct workers' rights to freedom of association.
 - Interfere with workers' rights to conduct their activities and elect their representatives.
2. No forced labor is permitted. Forced labor is defined as "all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily." This includes:
 - *Prison Labor:* Work performed by incarcerated individuals as a requirement of their sentence.
 - *Indentured Labor:* Work performed by individuals contractually bound to their employer for a designated time period, usually in return for payment of travel and living expenses.
 - *Bonded Labor:* Work performed by individuals who are subjected to loans that they are required to pay off through low wages by the lender and employer.



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PureCircle management should not place any restrictions for workers to voluntarily end their employment, such as excessive notice periods or substantial fines for terminating their employment contracts. Labor contracts must also meet legal requirements.

Factories must not restrict or limit employee access to religious facilities, toilets or drinking water in any way.

Management must not require, or allow employment agents to require, any monetary deposits. Management must not keep any original identification documents.

Smallholders (including tenants, share-croppers and other categories) have the right, on a voluntary basis, to establish and develop organizations representing their interests.

3. Child labor shall not be used. Processing facility workers should be no less than 15 years of age (or the legal minimum age if different) and, where laws require, not younger than the compulsory age to be in school. Farms cannot employ children to the extent that employment would interfere with the child's schooling. Moreover, children should not conduct hazardous work.

Facilities and farms must have age-verification procedures that are effectively implemented, so that every personnel file contains copies of the identification documents (such as birth certificates, national ID cards or school certificates) submitted by applicants.

4. No discrimination is practiced. Freedom from discrimination is a fundamental human right. Workers should not be discriminated against based on their gender, age, race, religion, or any other characteristics that do not pertain directly to their work performance.

Hiring, compensation, promotion, termination, and retirement practices, and access to training, should be based on a person's ability to perform the job effectively, not on a person's individual characteristics.

Procedure

PureCircle employees should follow procedures that comply with and support ILO Decent Work standards when hiring, compensating, and promoting employees. Management should not prohibit employees from forming or joining organizations of their choice. Additionally, PureCircle should not threaten or penalize workers who choose to bargain collectively.





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PureCircle recognizes the challenges involved in detecting and correcting violations of applicable laws and labor standards where the company does not have direct control, especially in a smallholder farm setting. With this said, PureCircle has an obligation to address any issues that may arise. Management also recognizes that steps can be taken to promote lawful and ethical labor conditions. To this end, on an annual basis, PureCircle field teams should clearly communicate PureCircle's policy and procedures to all PureCircle employees, contractors, and suppliers. This communication should include adequate description of decent work standards, labor laws, and the process to report confirmed or suspected violations.

Buyers who purchase stevia leaf from producers should convey PureCircle's policy to the producers.

Any confirmed or suspected violations of these procedures should be reported as soon as practical. All reported violations shall be investigated, and corrective actions established, as appropriate.

Training

PureCircle employees, contractors, and suppliers should be trained annually. The training should be documented.

Records

Maintain a copy of training documents and any reports of violations (with corrective actions as appropriate) in files for three years.

