

Child Labour, Modern Slavery, and Human Trafficking Policy

iFathom has zero tolerance for child labour, modern slavery, and human trafficking. We are committed to ensuring that our business activities, including those conducted through third-party suppliers and partners, do not support or perpetuate any form of exploitation. iFathom upholds the highest ethical standards and complies with all applicable laws, including the Employment Standards Act, 2000 (Ontario), the Criminal Code of Canada, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

This Policy applies to:

- All employees, officers, and directors of iFathom
- Contractors, subcontractors, suppliers, and any third parties who do business with the Company
- All jurisdictions where iFathom operates, with particular attention to operations within Ontario and suppliers both domestic and international

Definitions

Child Labour: Work that deprives children of their childhood, potential, or dignity, and is harmful to their physical and mental development. In Ontario, the legal minimum working age is typically 14 to 16, depending on the industry. *(please see below in "Minimum working age by Industry")*

Modern Slavery: Includes forced labour, debt bondage, forced marriage, and human trafficking.

Human Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons through force, fraud, or coercion for the purpose of exploitation.

Company Responsibilities

iFathom will:

- Conduct due diligence on suppliers and partners to assess the risk of child labour and modern slavery
- Include anti-slavery clauses in supplier agreements
- Regularly review operations and supply chains for potential risks
- Provide training to staff involved in procurement and supply chain management
- Take immediate corrective action if any concerns are identified

Employee and Contractor Responsibilities

All employees and contractors must:

- Always Comply with this Policy.
- Report any suspected violations or risks immediately.
- Cooperate with investigations and audits related to labour practices.

Reporting Violations

Anyone who suspects a violation of this Policy must report it through one of the following:

- Their manager or supervisor
- The Human Resources Department
- The anonymous whistleblower line or reporting email (See Whistleblower Policy)

Reports will be treated confidentially and taken seriously. Retaliation against individuals who report concerns in good faith is strictly prohibited.

Enforcement and Disciplinary Action

Any employee or business partner found to be in violation of this Policy will be subject to disciplinary action, up to and including termination of employment or contract, and may be reported to legal authorities where appropriate.

Policy Review

This Policy will be reviewed annually and revised as needed to reflect changes in legislation, organizational practices, or identified risks in the supply chain.

Minimum working age by industry

Regulations made under the *OHSA* set out the minimum working age for certain industries.

You must be at least 19 years old to be a:

- shaft attendant for a shaft where a hoist is being used on a construction project

You must be at least 18 years old to work:

- in an underground mine or at the working face of a surface mine
- in window cleaning
- offshore on or from an oil or gas rig

You must be at least 16 years old to work in:

- a mining plant or surface mine, excluding the working face
- construction, excluding the role of shaft attendant for a shaft where a hoist is being used
- logging operation

You must be at least 15 years old to work in factories other than a logging operation, such as:

- manufacturing or assembly plants
- repair shops
- restaurant kitchens
- automotive service garages
- produce and meat preparation in grocery stores
- shipping and receiving areas in grocery stores
- laundries (for example in a public hospital or a hotel)
- warehouses

You must be at least 14 years old to work in other industrial establishments such as:

- offices
- stores
- arenas
- restaurant serving areas

Other restrictions on the age of workers

Under the Education Act, children must generally attend school from the age of 6 until the age of 18. Employers are also prohibited from employing children under the age of 16 during school hours. However, the *Education Act* provides a list of legal exceptions to these requirements. For example, children aged 14 years and older may be excused from school or required to attend school only part-time in order to attend supervised alternative learning programs, which may include employment.

In addition to the regulations made under the *OHSA* that set the minimum age for working in Ontario workplaces, some employers have their own policies for minimum ages in the workplace.

Age to visit the workplace

People who are too young to work in industrial establishments such as offices, stores, arenas, restaurants and factories are still allowed to visit those workplaces if any of the following conditions are met:

- they are accompanied by someone who is at least 18 years old
- they are being guided on a tour of the industrial establishment
- they are in an area of the establishment used for sales purposes
- they are in an area of the establishment that is accessible to the public



Unless accompanied by and under the direction of a guide, you must be at least 18 years old to visit:

- underground mines
- the working face of a surface mine

You must be at least 16 years old to visit:

- a construction project while work is being performed there
- surface mines (excluding the working face) or mining plants, unless accompanied by and under the direction of a guide.

This resource does not replace the Occupational Health and Safety Act (OHSA) and its regulations and should not be used as or considered legal advice. Health and safety inspectors apply and enforce these laws based on the facts they find in the workplace.

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