Edited: July 27, 2020

Dear Licensee/Vendor,

As you know, Disney's International Labor Standards (ILS) program and <u>Code of Conduct for Manufacturers</u> prohibit the use of involuntary labor in the production of Disney-branded products.

In an effort to strengthen prevention efforts in this area and align with evolving industry practice, we are clarifying that the prohibition against the use of involuntary labor includes:

- (1) the prohibition of workers paying certain fees and expenses to obtain or retain employment;
- (2) the requirement to reimburse workers who were charged non-permissible fees;
- (3) the requirement that terms of employment not be unilaterally changed, if those changes negatively impact workers, once they are signed; and
- (4) the requirement that all terms and conditions of employment be stated in the employment contract and are voluntarily agreed to by workers prior to employment, or in the case of migrant workers, prior to their departure from their points of origin.

Effective **November 1, 2020** violations of the above and any other forms of involuntary labor will be expressly noted in facility audit reports as Minimum Compliance Standard (MCS) violations. Licensees and Vendors will be provided with an opportunity to remediate these violations, including having employers reimburse facility workers for any unpermitted fees paid and/or expenses deducted from wages since the effective date. Disney may require that Disney-branded production at the facility be suspended until remediation is completed.

Further guidance on our requirements can be found in the <u>Involuntary Labor Policy</u>.

In addition, several publicly available resources may help to provide you with more information on involuntary labor and responsible recruitment and how to operationalize these measures:

- Consumer Goods Forum, <u>Guidance on the Priority Industry Principles</u>
- Leadership Group for Responsible Recruitment, <u>Six Steps to Responsible</u>
 Recruitment
- International Labor Organization, Global Business Network on Forced Labour
- International Labor Organization, <u>Indicators of Forced Labor</u>
- Responsible Business Alliance, Responsible Labor Initiative
- Responsible Business Alliance, <u>Guide to Due Diligence on Recruitment Fees in International Supply Chains</u>
- United States, Customs and Border Protection, <u>Forced Labor</u>
- United States Department of State, <u>Responsible Sourcing Tool</u>

Please contact your ILS representative should you have any questions.