Forced Labor Supplemental Guide

Summary of Changes

The Forced Labor Supplemental Guide (formerly known as the Involuntary Labor Supplemental Guide) has been amended to provide greater clarity for users. The following is a list of the principal updates and clarifications included in this latest version of the Forced Labor Supplemental Guide. We encourage you to review the document in full at www.disneylaborstandards.com.

UPDATES

1. Permissible and Non-Permissible Fees

- The Operational Guidance on Recruitment Fees & Expenses section was modified to include the following nonpermissible fees:
 - Language interpretation fees
 - Translation fees
 - Skills test fees
- Clarification has been added regarding early termination of employment:
 - Workers must not be charged any fees for early termination if the reason is due to abuse or threat to worker safety

2. Key Compliance Benchmarks Section

- Color-coded ratings have been added next to each benchmark (a red circle denotes Minimum Compliance Standard (MCS) benchmarks and a yellow circle denotes Non-MCS benchmarks)
- Benchmarks have been added to clarify requirements. Please refer to this section in the document for more information.

3. Terminology

In alignment with terminology in Disney's Supply Chain Code of Conduct, "involuntary labor" has been replaced with "forced labor" throughout the document.

4. Disney Code

The text in the Disney Code section has been replaced with text from the latest version of Disney's Supply Chain Code of Conduct.