

1. Purpose

Sonapack Ghana Limited is committed to maintaining a workplace free from all forms of forced, bonded, or involuntary labour.

2. Scope

This policy applies to:

- All employees (permanent, temporary, and contract).
- Labour hire agencies and recruitment firms (Reliance Services, First Manpower).
- Contractors, vendors, and suppliers.

3. Legal and Regulatory Framework

This policy is guided by:

- **Ghana Labour Act, 2003 (Act 651)** — Section 116 prohibits forced labour.

4. Key Principles

1. Employment is freely chosen — no coercion or threat.
2. Employees have the right to terminate their employment freely with reasonable notice.
3. No recruitment fees or deposits shall be charged.
4. Employees retain control of their personal identification and travel documents.
5. Work is performed under safe and fair conditions with full consent.

5. Roles and Responsibilities

Role	Responsibility
Management	Ensure enforcement of this policy; allocate resources for training and audits.

Role	Responsibility
HR Department	Conduct fair recruitment, verify ages, and keep proper employment records.
Procurement Department	Include forced labour clauses in all supplier contracts and monitor compliance.
Supervisors	Observe and report any behaviour or practice that may indicate forced labour.
Employees	Work voluntarily and report any suspected coercion or violations.

6. Procedures

6.1 Prevention Procedures

1. Recruitment and Hiring

- All recruitment must be voluntary, transparent, and documented.
- Employment contracts must be written in a language understood by the employee and signed before work begins.
- Contractors and agencies must confirm in writing that they do not engage in forced labour practices.

2. Identity and Document Retention

- The Company shall not hold original IDs, passports, or certificates of employees.
- Secure storage can be provided at the employee's request, but documents must remain accessible at all times.

3. Freedom of Movement

- Employees shall have the right to move freely within and outside the workplace during non-working hours.
- No curfews or restrictions shall be imposed, except for lawful safety or security reasons.

4. Employment Terms

- Wages, working hours, and conditions must comply with Ghana's labour laws.
- Overtime shall be voluntary and compensated per law.

6.2 Detection Procedures

1. Audits and Inspections

- HR and Compliance will conduct periodic audits of employment practices and supplier sites.
- Audit indicators include withheld documents, unpaid wages, excessive working hours, or inability of employees to resign freely.

2. Interviews and Assessments

- Confidential employee interviews may be conducted to verify voluntary employment.
- Suppliers and labour agencies must provide evidence of compliance during site visits.

3. Reporting Channels

- Employees and contractors can report suspected forced labour anonymously through:
 - **HR Office** (confidential report)
 - **Suggestion/Complaint Box**
- All reports are treated confidentially and without retaliation.

6.3 Response and Remediation Procedures

1. Investigation

- HR and Compliance will promptly investigate any reported or suspected case of forced labour.
- The investigation will include employee interviews, document review, and site inspections.

2. Immediate Action

- If a worker is found to be in forced or coercive conditions, they will be **immediately released** from that situation.

3. Corrective Measures

- Contractors or suppliers found violating this policy will be required to:
 - Cease the practice immediately.
 - Provide remediation and compensation to affected workers.
 - Undergo a re-audit to verify corrective action.
- Persistent non-compliance will result in contract termination and possible legal reporting.

4. Remediation Support

- The Company may assist affected individuals by:
 - Providing safe accommodation or counselling.
 - Referring them to relevant authorities or social services.
 - Ensuring they receive all due wages and benefits.

7. Training and Awareness

- Annual **training programs** will be provided for all staff and management on forced labour awareness, identification, and reporting.

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- **Suppliers and contractors** will be briefed on this policy during onboarding and contract renewals.

8. Monitoring and Review

- Compliance with this policy will be monitored through internal audits and supplier assessments.
- The HR Department will maintain records of investigations, training, and corrective actions.
- This policy will be **reviewed annually** or as required by changes in law or company operations.

9. Disciplinary Action

Any employee, contractor, or supplier found in breach of this policy shall face:

- Disciplinary action up to and including termination of employment or contract.
- Reporting to the Ghana Police Service or Labour Department if criminal activity is suspected.

RACHEL KOUAME

Managing Director of Sonapack GH Ltd



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