

Employment Policy

Department: Human Resources

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Overview

Hemlock Printers Ltd., Hemlock Printers (USA) Inc., Hemlock Connect Inc. and Hemlock Display Solutions Ltd. (collectively referred to as “Hemlock”) does not tolerate the use of child labor, forced or compulsory labor or discrimination in employment and occupation. We respect and comply with both Canadian and US local, provincial/state and federal law as it relates to these issues, and as it relates to freedom of association and the right to collective bargaining.

The purpose of this document is to outline employment requirements to ensure that Hemlock complies with all applicable laws and regulations.

Policy

In addition to the specific requirements posted for each position, the following are requirements for Hemlock employment:

A. Employment of Minors

Due to the nature of work at Hemlock, employees must be at least 16 years of age to ensure their safety and comply with legislation and laws.

Employees that are enrolled in school are not permitted to work during school hours unless it is part of an apprentice, work-experience or internship program.

Maximum hours:

- School in session:
 - 4 hours per day on any school day
 - 8 hours per day on any non-school day or any day preceding a non-school day
 - 48 hours per week
- School not in session:
 - 8 hours per day
 - 48 hours per week
- Spread of hours:
 - 5:00am – 10:00pm on any school day
 - 5:00am – 12:30am on any non-school day or any day preceding a non-school day

Prohibited duties include:

- Repairing, maintaining or operating machinery, tools or other equipment that could impose a risk of injury, including forklifts
- Working with goods that a minor cannot legally distribute, purchase or use
- Lifting, carrying or moving an item that puts the minor at risk of injury
- Working with or exposure to hazardous chemicals or materials
- Working higher than 3 meters/10 feet from ground or floor level

Minor employees must be paid as an adult employee based on the same pay scale experience levels in relation to quantity, quality and classification of work, including wage rates above the minimum wage of the jurisdiction.

Legal Requirements

British Columbia:

Hemlock must comply with the BC Employment Standards Act (BC ESA) and WorkSafeBC with regards to the employment of young workers. Employers with workers 16 and older must:

- Follow employment standards for regular employees
- Meet WorkSafeBC requirements for young workers (under 25 years old)
- Make any required federal payroll deductions

Washington State:

Hemlock must comply with the Federal and Washington State laws and regulations with regards to the employment of young workers. Employees with workers between 16 and 18 must:

- Obtain a minor work permit endorsement on our business license through WA Department of Revenue (DOR) and post the new business license on premise
- Receive a completed parent/school form (when school is in session) or summer authorization form (during summer break)
- Verify the worker’s age.

California:

Hemlock must comply with the Federal and California laws and regulations with regards to the employment of young workers. Employees with workers between 16 and 18 must:

- Obtain a Permit to Employ and Work through State of California Department of Education
- Receive a Statement of Intent to Employ Minor and Request for Work

B. Employment Eligibility Verification (Canada T4/ USA Form I-9)

Both Canadian and US federal regulations require all employers to verify the identity and eligibility to legally work of every person hired. A new employee must complete Employment Eligibility Verification forms (Canada T4/ USA Form I-9) no later than the close of business on their first day of work.

C. Employee Work Authorization documentation

New employees must present a Canadian Social Insurance (SIN) or US Social Security (SSN), proof of Citizenship, Residency status or Work Permits on or before the first day of work.

D. Forced Labour

Hemlock shall prohibit any form of forced labour, including bonded labour, indentured labour, slave labour, or human trafficking. Hemlock employees shall be allowed to move freely and leave their place of work when their work shift ends.

E. Freedom of Association and Rights to Collective Bargaining

Hemlock shall respect employees’ rights to form, join or not join a labour union or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment. If no legally recognised union exists in the area of operations, or in the case of Hemlock USA if only state-authorized organisations are allowed, Hemlock shall respond to initiatives to establish internal means to achieving effective representation of workers’ interests.

Employment Policy

Compliance

All subsidiaries within the Hemlock Group shall comply with the provisions of the Employment Policy as well as both Canadian and US local, provincial/state and federal law and regulations. Should there be differences between the content of this policy and local, provincial/state and federal laws and regulations or other applicable standards, the more rigorous requirements shall apply.