



PANGAIA

Child Labour & Young Workers Policy





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PANGAIA is committed to respecting human rights and prohibits all forms of forced labour including the worst forms of child labour. This policy aims to prevent the exploitation of children and safeguard the rights of young workers in our own operations and supply chain.

This policy is the minimum standard that applies to all PANGAIA partners - vendors, suppliers, agents, distributors, factories, mills, processing facilities, farms and any associated subcontractors, subsidiaries and other suppliers who contribute to PANGAIA's products (henceforth referred to in this policy as 'Suppliers') must meet. All Suppliers shall uphold this policy, or have a similar policy of their own, and are responsible for disseminating to their suppliers and any approved subcontractors to ensure that these principles are adhered to.

Suppliers must comply with all applicable international, national, local and other relevant laws and regulations, including The International Labor Organization ("ILO") Minimum Age Convention 138, The ILO Worst Forms of Child Labour Convention 182, and The UN Convention on the Rights of the Child. Where there are differences or conflicts with local law, the higher standard should prevail.

CHILD LABOUR

Our Commitment

At PANGAIA we recognise the rights of every child and believe that a child or young person should never experience abuse of any kind. All children have the right to have a childhood, to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with their education, or to be harmful to their health or physical, mental, moral, or social development.

We acknowledge that children can be connected to supply chains, and that there is a high potential for them to be present at raw material sourcing stage, present on family farms and homeworking arrangements, or connected with informal economies.

PANGAIA is committed to protecting the rights of young workers and remedying any instances of child labour. As stated in PANGAIA'S Code of Conduct there shall be no use or recruitment of child labour.

We shall undertake due diligence and work towards visibility of our supply chain to understand the social practices and where there are risks of child labour. In any instances of child labour we will work in the best interests of the child to ensure satisfactory remediation.

Supply Chain Responsibilities

Suppliers are required to have systems in place to ensure that child labour is not employed directly by them or by any affiliate, or subcontractor.

Suppliers must maintain a full list of all employees, detailing full names, work department, details from identification documents, date of birth and date employment commenced.

Age verification systems and processes must be in place to diligently verify the authenticity and accuracy of proof of age documents, e.g. birth certificates, passports, ID cards etc.

Suppliers must undertake due diligence in monitoring their own operations, and those of their subcontractors, suppliers, and service providers, and to contact PANGAIA if they have any concerns regarding child labour.

Whilst PANGAIA does not endorse light work, we recognise that there are still structural and socio-economic situations that keep children present in the workplace through light work. Where children are engaged in light work, PANGAIA expects that it will only be undertaken in line with boundaries set by the



ILO and guardrails are put in place to protect children, their health, childhood and education. In instances where light work is completed, it must be limited in hours which do not compromise a child's health or access to education, that any work is not a primary income for a household, that work is not hazardous in any manner, and that it is not at the detriment to their safety.

To monitor practices, Suppliers should pursue external third-party verifications methods such as certification of materials, including the assessment of social elements and working practices.

Remediation

PANGAIA is committed to remedying any use of child labour. If child labour is confirmed in PANGAIA'S supply chain operations (directly, in supply chain, or via subcontractors), we require that the Supplier will engage with PANGAIA and qualified organisations (e.g. local NGO experts) to ensure that measures are taken in the best interest of the child to develop a responsible solution.

PANGAIA requires Suppliers to immediately communicate to PANGAIA'S Impact Team if child labour is found to be or have been in use, and to provide to PANGAIA full details of the instances of it and information on the remediation process, which at a minimum must include;

1. Child should be removed from work immediately to a safe place where the situation and risks should be explained in a sensitive and safe manner (local child rights NGOs can be used to engage with the child);
2. Clarification and confirmation of identity and the true age of the child;
3. In cooperation with the child's family, employer and other relevant parties, the Supplier is required to understand and listen to the needs of the child and seek a satisfactory solution, taking into consideration the child's age, social situation, education etc;
4. Possible remediation options should be recorded including enrolment into quality education, training or appropriate courses, where applicable;
5. Provision of food and safe accommodation free of charge by the Supplier to the child if family situation cannot provide these, until remediation is completed;
6. Arrangement of a stipend payment, and the cost of transportation, if applicable, must be endorsed and paid to the child or family until the end of remediation program (e.g. the child meets the legal working age and the stipend should be at least local minimum wage standard);
7. Consistent communication about the remediation program with the child and parents or guardian. Supplier can work with a non-governmental organisation to support the remediation, if necessary;
8. Commitment by Supplier to re-hire the child once reaching minimum working age, if the child wishes;
9. Supplier to keep all the necessary documents and records, including payslips or bank transfers of stipend; and
10. Supplier to review the accuracy and authenticity of personnel records and to improve age verification system with records.

In delivering this policy we expect those in our supply chain to protect the welfare and living conditions of all suspected or confirmed child labourers, it is also expected that all remediation communication is in a language the child fully understands and that it is made clear and comprehensible to the child and their family or guardian. All remediation must be in the best long-term interests of the child. No suspected or confirmed child labourer should be threatened or expelled and the Supplier must be transparent and honest with PANGAIA throughout the remediation process.

PANGAIA reserves the right to cease operations with Suppliers that violate this policy immediately on written notice.



YOUNG WORKERS

Our Commitment

PANGAIA supports the employment of young workers, on the condition that they are not employed in hazardous conditions. This includes no overtime, night work, handling chemicals, working with heavy machinery or electrics and being exposed to hazardous materials or environments.

PANGAIA supports Suppliers who provide formal work-based training or apprenticeship programmes in factories that enable young workers to learn new skills and are not in hazardous conditions or working with hazardous substances. These programmes must meet local law (where applicable) and develop young workers' skills and experience.

Supply Chain Responsibilities

Suppliers must ensure that adequate precautions are put in place for the protection of young workers and that they are not employed in hazardous conditions or exposed to hazardous materials.

Suppliers must maintain a complete list of all employees, detailing full names, work department, details from identification documents, date of birth and date employment commenced.

Age verification systems and processes must be in place to diligently verify the authenticity and accuracy of proof of age documents, e.g. birth certificates, passports, ID cards etc. If official date of birth documents are not available (e.g. because of lack of Governmental documentation systems) the worker's age must be established using other available methods.

There will be no discrimination based on age or any other characteristic. All workers shall be afforded equality of treatment and opportunity.

All working conditions must adhere to the PANGAIA Code of Conduct, and other key policies.

Third-party verifications such as certifications, audits and assessments should be completed to monitor practices and adherence to PANGAIA's policies.

Remediation

If it is found that young workers are employed in hazardous work, then the Supplier must:

1. Immediately remove the young worker from the hazard;
2. Continue to employ the young worker without any reduction in pay or benefits;
3. Carry out a detailed risk assessment to establish work that the young worker can do safely;
4. Establish sufficient management systems and training to ensure that the young worker follows safe systems of work and avoids all forms of hazardous work.

Suppliers are expected to be fully transparent with PANGAIA on the employment of young workers at all sites and subcontractors.

PANGAIA reserves the right to cease operations with Suppliers that violate this policy immediately on written notice.



DEFINITIONS

Child: Any person less than 15 years of age unless local minimum age law stipulates a higher age of mandatory schooling, in which case the higher age shall apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, the lower will apply in strictly limited circumstances.

Child Labour: Any work undertaken by a Child (as defined above). This also includes any work that is likely to be hazardous or interfere with their education, or cause harm to their physical, mental, spiritual, moral or social health or development.

Employer: An Employer is a legal entity that provides any form of (permanent, casual, full or part time) work in return for remuneration and that controls and directs workers at the workplace.

Hazardous Work: Work which by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children or young people. This includes handling chemicals or harmful substances, working with heavy machinery or electrics, working in confined spaces or underground or under water, working at height or in extreme temperatures, being exposed to dusty environments, fumes or loud noise, lifting heavy loads or strenuous work, working excessive hours, working overtime or working at night.

Light Work: Children are allowed to perform light tasks or work in some circumstances, aligned with the ILO Convention 138 with restrictions. This kind of work might include children helping out with their parents work, is not a household's primary income and is not hazardous in any way. This work is distinguished from Child Labour as it does not impede child rights or put their health, development, or education at risk.

Supplier: Factories, vendors, manufacturers, mills, licensees, partners, affiliates, agents and any other party who supplies PANGAIA with goods or materials.

Worst Forms of Child Labour: Children coerced into forms of labour as defined under ILO Convention 182 including; modern slavery and forced labour, such as child trafficking and forced recruitment for armed conflict; the use of children in prostitution and pornography; the use of children in illicit activities; and any activity or work by children that, by its nature or the conditions in which it is carried out, is likely to harm their health, safety or morals, often referred to as "hazardous work".

Young Person: Any person over the age of a Child but under the age of 18.

Young Worker: A person legally entitled to work, who is 15 years old or above the minimum age of employment in the country where they work but below the age of 18.

PANGAIA is committed to working collaboratively with Suppliers and will provide guidance, support and encouragement to Suppliers working towards becoming more sustainable. For any queries, feedback, disclosures, or whistleblowing please contact: impact@thepangaia.com