

Child Labour Remediation Policy

(PPP007)



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1 Introduction

Papilo is committed to preventing and addressing the use of child labour within our supply chain and protecting the rights of young workers. Our Ethical Trade & Human Rights Policy explicitly prohibits the use of child labour.

We expect suppliers to undertake credible due diligence and monitor their operations to ensure that their sites and supply chain are free from child labour and/or young people employed in hazardous work.

If child labour is found at a site owned and operated by a member of our supply chain, we commit to engage with the supplier, the site, and any qualified organisations to develop a solution that prevents further harm and supports the long-term interests of the children involved.

Suppliers and sites found utilising child labour are expected to fully support all stages of the investigation and remediation process, and cover any costs detailed in this policy or deemed necessary by Papilo and any external support provider.

2 Immediate protection of children & young workers

Following a report of discovery of child labour, the supplier and Papilo will agree a corrective action and remediation plan with the site, which should include the following actions.

Suppliers must:

- Ensure that children stop work immediately, are provided a clear explanation of immediate next steps and are supported through the process by either a Social Compliance / Ethical Trading Representative or an appropriate member of the supplier's Human Resource / Personnel team.
- Undertake a full review of all site personnel records and create a list of all potential child labourers and young workers.
- Ensure that all children identified have access to safe and adequate housing, are provided with meals, and are adequately protected from harm until they can be reunited with their family.
- Inform Papilo via email: compliance@wearepapilo.com

Papilo will:

- Inform the Ethical Trading Initiative (ETI) of the issue and share details of the affected site(s). We aim to work in collaboration with the ETI, their members and other affected stakeholders in the delivery of any remediation.

- Inform relevant stakeholders including, but not limited to, Commercial, Supply Chain, PR & Technical.
- Record all internal actions and communicate any additional requirements to the supplier.

3 Design & implementation of a remediation plan

In collaboration with Papilo and our external support provider, suppliers must:

- Explain the restrictions on working ages to children and assure them that, if they wish, they can continue working after they reach the legal minimum working age.
- Take steps to understand what the children want and need in the short-term and find out what options exist for re-starting education.
- Develop a remediation plan that:
 - Provides the opportunity for children to re-enter education and protects their economic wellbeing, where possible in consultation with a relevant non-governmental organisation, and always in consultation with the child.
 - Ensures the child receives compensatory remuneration on a monthly basis until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example, the employment of an unemployed adult family member in place of the child). Wages should be set at the national or regional legal minimum and paid irrespective of whether the child is supporting family members, or if the child is self-dependent.
 - Ensures the child has access to appropriate training, apprenticeships or counselling that may be required to support their ongoing wellbeing and development.
 - Guarantees the child has acceptable and safe accommodation and living conditions.
 - Documents all actions taken in support of remediation.

4 Ongoing actions & monitoring

In collaboration with Papilo and our external support provider, **suppliers must**:

- Regularly check site personnel records and any remediation actions designed to prevent new recruitment of child workers and enhance protection for young workers who remain in employment.
- Regularly check and report back on the welfare of the child to ensure remediation plans are being delivered effectively. This can be undertaken by a local third-party organisation if appropriate.

During this process, suppliers & sites **must not**:

- Remove, dismiss, or conceal any of the suspected or confirmed child labourers and/or young workers without prior notification to Papilo.
- Threaten the children, or their families, or interfere with any part of the assessment or remediation.
- Conceal or falsify any documentation.

Such actions will be considered by Papilo as evidence that the supplier and site are not committed to effective child labour remediation and are in breach of Papilo Ethical Trade & Human Rights Policy.

5 Appendix (Definitions)

Child: Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or 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 No. 138, the lower will apply.

Young Person: Any worker over the age of a child as defined above and under the age of 18.

Child Labour: Any work by a child younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education or to be harmful to the child's or young person's health or physical, mental, spiritual, moral, or social development.

Hazardous Conditions: The following are examples of hazardous work according to the ILO:

- Work which exposes children to physical, psychological, or sexual abuse.
- Work underground, underwater, at dangerous heights, or in confined spaces
- Work with dangerous machinery, equipment, and tools, or which involves the manual handling or transport of heavy loads.
- Work in an unhealthy environment which may, for example, expose children to hazardous substances, agents, or processes, or to temperatures, noise levels, or vibrations, damaging to their health.
- Work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.

6 Director sign-off

Name Paul Hodgkiss

Position CEO

Signature *Paul Hodgkiss*

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Document Control

Version	Version Date	Changes By	Version Notes
V1	19/10/2023	MK	Policy implemented
V2	06/02/2023	MK	Updated with Papilo Branding

