



Child Labour Remediation Policy

LTi Metaltech (“LTi”) acknowledges the fact that child labour occurs in many countries. However, we do not accept child labour and are actively opposed to it within our supply chain. The complexity of the child labour issue requires a consistent, long-term effort to create sustainable and broad-based solutions in order to reach our goal which is that no products delivered to LTi are produced using child labour.

Whilst LTi Metaltech respects different cultures and values in countries where we may source our products, we will not compromise on the basic requirements regarding the Rights of the Child.

This Child Labour Remediation policy has been established in order to make our position clear to suppliers and their co-workers, as well as any other interested parties. The requirements in this code of conduct are mandatory to all suppliers and their sub-contractors.

General Principle

LTi Metaltech does not accept child labour.

We support the United Nations (U.N.) Convention on the Rights of the Child (1989) and this Child Labour Remediation policy is based on this Convention, which stipulates:

- “All actions concerning the child shall take full account of his or her best interests.” (Article 3)
- “The right of the child is to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development”. (Article 32.1).

In addition, this policy is based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973). According to this convention, the word “Child” is defined as any person below fifteen (15) years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. If, however, the local minimum working age is set at fourteen (14) years of age in accordance with exceptions for developing countries, the lower age will apply.

This Policy also incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

Implementation

All actions to avoid child labour shall be implemented by taking the child’s best interests into account. LTi requires that all suppliers shall recognise the U.N. Convention on the Rights of the Child and that the suppliers comply with all relevant national and international laws, regulations and provisions applicable in the country of production.

Suppliers are obliged to take the appropriate measures to ensure that no child labour occurs at their, or their sub-contractors, places of production.

If child labour is found in any place of production, LTi will require the supplier to implement a corrective action plan. If that corrective action is not implemented within the agreed time-frame, or if repeated violations occur, LTi will terminate all business with the supplier concerned. The corrective action plan shall take the child's best interests into consideration, i.e. family and social situation and level of education.

Care shall be taken not merely to move child labour from one supplier's workplace to another, but to enable more viable and sustainable alternatives for the child's development.

All suppliers shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of this LTi Child Labour Remediation Policy, and ensure that all measures required are implemented accordingly.

Young Workers

LTi supports the legal employment of young workers, according to the laws of their country.

Young workers of legal working age have, until the age of 18, the right to be protected from any type of employment or work which, by its nature or the circumstances in which it is carried out, is likely to jeopardise their health, safety or morals.

LTi therefore requires all its suppliers to ensure that young workers are treated according to the law; this includes measures to avoid hazardous jobs, night shifts and ensure minimum wages. Limits for working hours and overtime must be set with special consideration to the workers' young age.

Register of Labour

The supplier shall maintain documentation for every worker verifying the worker's date of birth. In countries where such official documents are not available, the supplier must use appropriate assessment methods as per local practice and law.

Monitoring

All suppliers are obliged to keep LTi informed at all times about all places of production (including their sub-contractors). Any undisclosed production centres found would constitute a violation of this code of conduct.

Through the General Purchasing Conditions for the supply of products to LTi, we have reserved the right to make unannounced visits at any time to all places of production (including sub-contractors) for goods intended for supply to LTi. LTi furthermore reserves the right to assign, at its sole discretion, an independent third party to conduct inspections in order to ensure compliance with this Child Labour Remediation policy.

Remediation

If child labour is found in the supply chains of LTi, it will seek to work in partnership with the supplier and appropriately qualified organisations to develop a responsible solution that is in the best long-term interests of the children. The supplier and LTi will agree a corrective action plan, which may comprise the following actions:

- To collate a list of all potential child labourers and young workers
- Seek advice and help from a recognised local non-governmental organisation ("NGO") that deals with child labour or the welfare of children

- To develop a remediation plan that, in consultation with LTi and a local NGO, secures the child's education and protects their economic well-being, as well as working in consultation with, and respects the views of, the child.
- Explains the legal requirements and restrictions on working ages to the child and provides assurance where possible that, if they wish, they will be employed when they reach working age.
- Understands the children's desire to re-enter education and explores the opportunities for them to do so.
- Where the child contributes to the livelihoods of their family or they are self-dependent, wherever reasonably possible, their wage should continue be paid until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an unemployed adult family member in place of the child labourer).
- Ensures that the child worker has adequate accommodation and living conditions.
- All actions must be documented.
- To investigate how a child was employed outside of the legal requirements and restrictions of the country and to develop robust processes to prevent recurrence.

The supplier or sub-contractor **must not**:

- Expel any of the suspected or confirmed child labourers and/or young workers.
- Threaten the children or their families or hamper the progress of investigation and remediation.
- Conceal or falsify any documentation.

Any such actions will be considered by LTi as evidence that the supplier is not committed to this child labour remediation, and is in breach of this Child Labour Remediation Policy.

Should any child be found to be working within LTi Metaltech or their UK supply chain, the Directors of the business must ensure that the local police force and Social Services, the support system provided by local authorities to help vulnerable adults and children, are urgently informed and that the child is immediately transferred to their care. This will ensure that the child is protected from any risk of harm, neglect or abuse whilst an investigation is carried out into their employment with LTi and an assessment is made regarding their safety, as well as their ongoing care arrangements and educational needs outside of that employment.