



The Regatta Group has a stringent Code of Conduct regarding Child Labour and Young Workers, and we take all factory non-compliance issues very seriously.

We expect all suppliers to know and follow the Child Labour and Young Worker Policy.

Definitions:

Child: Someone who is under the age of 15.

Child Worker: A Child who is not legally entitled to work, i.e., Below the age of 15 or the minimum age of employment, if this is higher. However, in strictly limited circumstances, where local law sets the minimum age at 14 years, the lower will apply under the ILO Convention 138 in accordance with developing country expectations.

Hazardous Work: Any work which, by the nature of the circumstances in which it is carried out, is likely to harm the health, safety, or morals. Hazardous conditions may include but are not limited to overtime, nightwork, chemical handling, physical hazards, safety hazards and unsafe working conditions.

Child Labour: The exploitation of Children through any form of work that deprives them of their childhood, interferes with their ability to attend regular school, or is mentally, physically, socially, and morally harmful.

Young Worker: A Young Worker is older than a Child but below 18 years of age and legally entitled to work.

Our Policy:

All Regatta Group suppliers must ensure that child labour does not occur within their facilities. No person should be employed or complete work if:

- They are under 15 years old (or 14, where ILO Convention 138 makes an exception). This includes the children of workers living in factory-provided accommodation and children brought to care facilities on site.
- They are below 18 years of age and engaged in dangerous/hazardous work that might jeopardise their physical, mental, or moral well-being because of its nature or the conditions under which the work is carried out.

Supplier Responsibilities:

We expect suppliers to undertake credible due diligence and monitor their operations to ensure their sites and supply chains are free from child labour and/or young people employed in hazardous work. Suppliers must cover all cost repercussions involved in the breach of the Child Labour and Young Workers Policy.

Transparent communication also helps The Regatta Group in its endeavour to continuously improve the supply chain facilities' management system and, at the same time, is critical to protecting the best interest of the concerned child.

If Child Labour is found, suppliers must:

- If child workers are found in The Regatta Group supply chain, we expect to be made aware of the situation immediately.
- All measures must be taken in the child's best interest, and all communication must be respectful and avoid questions, attitudes or comments that are judgmental or insensitive to cultural values.
- Clearly explain the legal requirements and restrictions on working ages to the child and confirm that they can have a job when they are no longer a child.
- Understand the child's situation and work with The Regatta Group on a remediation programme in the child's best interests.
- When a child worker is found, and there is evidence of criminal activity or trafficking, then, as the first port of call, the child should be placed into the care of the local authority for their safety. This must be done by a trusted party so as not to alert the criminals to the process.
- Support the livings of the child and ensure that the living conditions are secure through minimum wage compensation monthly until legal working age so that the child does not need to work in another factory.
- Document all actions, including payslips and fare receipts.
- Maintain copies of ID cards of ALL employees and develop age screening procedures.
- Ensure the root cause analysis occurs to understand how the child started working on-site.

If Child Labour is found, suppliers must not:

- Threaten the child or their family or hamper the implementation of the remediation programme.
- Expel without compensation any of the suspected or confirmed child labour.
- Send the child anywhere without prior notice to the Regatta group.
- Produce falsified records.
- Limit access to reasonably requested records or documents.
- Compensate the child without prior agreement with the Regatta Group.

Child Labour Redemption Programme

- If child workers are found in The Regatta Group supply chain, we will seek to work in partnership with the supplier and local NGOs to develop a responsible solution that meets the educational, social, and economic needs of the children concerned and is in the best long-term interests of the children.
- Local NGOs will meet with the family to build trust and understand the child's and family's background and needs.
- The local NGO will facilitate:
 - Monthly compensation to the child's family.
 - The enrolment of the child in school and monitor their attendance,
 - Offer skill sessions for the whole family, especially other children, and where possible, offer the job to an adult family member to retain the family income.
 - Local contact and monitoring of the child and family is required until they reach a working age.

If Young Workers are found working in Hazardous areas, Suppliers must:

- Immediately remove the young worker from the hazard
- Explain to them why they cannot work in that role. An alternative position should be found for the worker which meets the criteria for the employment of young workers but does not penalise them by reducing their income.
- Arrange a health check and ensure that any necessary treatment is provided (including long-term exposure to hazards).
- Continue to employ the young worker without any reduction in pay or benefits.
- Establish where the worker can work safely.
- Establish training to ensure the young worker stays safe and avoids all forms of hazardous work.
- Monitor the young worker's situation regularly to ensure they do not gradually shift back to high-risk activities.