

## 1. Introduction

TECTO does not accept child labour. We work together with our customers, suppliers and partners to actively promote children's rights throughout our value chain. TECTO is committed to respecting all children's rights. We believe that children are entitled to a healthy and happy childhood at all times, without being forced to enter employment before they are ready for it.

TECTO respects different cultures and values in countries where TECTO sources its products but does not compromise on the basic requirements regarding the Rights of the Child.

TECTO Child Labour Policy has been established in order to make TECTO's position clear to suppliers and their co-workers, as well as any other parties. The requirements in this code of conduct are mandatory to all suppliers and their sub-contractors.

## 2. Child Labour

All actions taken in response to suspected and/or identified child labour cases will be in the child's best interest, TECTO requires that all suppliers and service providers comply with this policy, and that includes complying with all applicable national and international legislation. The supplier shall always comply with the most demanding requirements, whether they are relevant applicable laws or TECTO's requirements. Should the TECTO requirement contradict national laws, the law shall always be complied with and prevail, unless the law contradicts basic principle5 of human rights. If child labour is found at any location that falls under the scope TECTO's supply chain, TECTO requires the supplier to implement corrective and preventive action plans that are in the best interest of the child.

In very specific circumstances, TECTO may allow light work for children, and/or apprenticeship or vocational training for students. Work of this type is subject to the approval of TECTO Directors prior to starting and remains under strict supervision for the duration of the activities. Securing the best interest of the child is always the priority, and that the rights of the child and/or student are both protected and actively supported for his/her future. API actions regarding a child are discussed in advance with him/ her and his/her parents or legal guardians.

Children are not allowed to work:

- without an employment permit issued by the education department of the local council, if this is required by local bylaws,
- in places like a factory or industrial site,
- during school hours,
- before 7am or after 7pm,
- for more than one hour before school (unless local bylaws allow it),
- for more than 4 hours without taking a break of at least 1 hour,
- in any work that may be harmful to their health, well-being or education,
- without having a 2-week break from any work during the school holidays in each calendar year.

### Term time rules

During term time children can only work a maximum of 12 hours a week. This includes:

- a maximum of 2 hours on school days and Sundays
- a maximum of 5 hours on Saturdays for 13 to 14-year-olds, or 8 hours for 15 to 16-year-olds School holiday rules

During school holidays 13 to 14-year-olds are only allowed to work a maximum of 25 hours a week.

This includes:

- a maximum of 5 hours on weekdays and Saturdays
- a maximum of 2 hours on Sunday

During school holidays 15 to 16-year-olds can only work a maximum of 35 hours a week. This includes:

- a maximum of 8 hours on weekdays and Saturdays,
- a maximum of 2 hours on Sunday.

### 3. Young Workers

TECTO supports the legal employment of young workers. A young person's risk assessment should be carried out before employing them.

By law, workers aged 16 or 17 must not work more than 8 hours a day and 40 hours a week.

They must also have, as a minimum:

- a 30-minute break if their working day is longer than 4.5 hours
- 12 hours' rest in any 24-hour period in which they work (for example, between one working day and the next)
- 48 hours' (2 days) rest taken together, each week or – if there is a good business reason why this is not possible – at least 36 hours' rest, with the remaining 12 hours taken as soon as possible afterwards.

Young workers aged 16 to 17 are entitled to at least £4.55 per hour.

Registered employers need to record and report their pay as part of running payroll. If they earn more than £120 a week, you'll also need to do other regular PAYE tasks like making deductions.

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.

TECTO, 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 should be set with special consideration to the workers' young age.

Young workers working in hazardous conditions or in a hazardous type of work is not allowed by TECTO.

### 4. General Principle

TECTO does not accept child labour. TECTO supports the United Nations (U.N.) Convention on the Rights of the Child (1989). TECTO child labour policy is based on this Convention, which stipulates:

- "All actions concerning the child shall take full account of their best interests." Article 3.
- "The right of the child 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.

Our requirements on the prevention of child labour and prohibition of hazardous work of young workers are based on the International Labour Organization (ILO) Minimum Age Convention No. 138 (1973) and the ILO Convention on the Worst Forms of Child Labour No. 182 (1999).

## 5. Implementation

All actions to avoid child labour shall be implemented by taking the child's best interests into account. TECTO 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 suppliers' and their sub-contractors' places of production.

If child labour is found in any place of production, TECTO will require the supplier to implement a corrective action plan. If corrective action is not implemented within the agreed timeframe, or if repeated violations occur, TECTO 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.

The supplier shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of TECTO Child Labour Policy, and ensure that all measures required are implemented accordingly.

## 6. Definitions

**Child:** a child is someone under the minimum school leaving age.

**Child labour:** Child labour is work performed by a child which interferes with a child's right to healthy growth and development and denies them of the right to quality education. Child labour is work performed by a child below the minimum working age that has not been specifically approved by TECTO as light work or apprenticeship / vocational training. The minimum working age is defined by the national legislation and is the age, above which a person can be employed on a full-time basis. It can be 16 years, 15 years or 14 years in certain developing countries.

**Young worker:** Young workers are someone aged 16 or 17, but above the minimum working age, who are engaged in work.

**Minimum working age:** The minimum legal working age is defined by the national legislation and is once they have reached the minimum school leaving age. (in England this is 16) above which a person can be employed on a full-time basis. It can be 16 years, 15 years, or 14 years in certain developing countries.

**Light work:** simple, limited tasks performed under adequate adult supervision, as long as they do not threaten the child's health and safety / their rights to play or hinder their education or vocational orientation and training. The requirements regarding their health and safety for light work are the same as for young workers (no hazardous work). When permitted by national law, 13-14 years olds are allowed to perform light work.

**Apprenticeship / internship / vocational training or orientation:** work that is one by a student of at least 14 years of age and is done as :a) A course of education or training, for which a school or training institution is responsible, b) And either a programme of training for which a school or training institution is responsible,

Every apprenticeship or vocational training of a person under the age of 18 has to be applied for and approved by TECTO prior to the start of the apprenticeship or vocational training.

Signed on behalf of TECTO LIMITED:



Position: Director

Date: December 2024