

# Child Labour Policy

## Purpose:

This policy outlines Reflex's commitment to preventing child labour within our operations and supply chain, in full compliance with local laws, international standards, and SEDEX requirements.

## Definitions:

- **Child Worker:** Any person under the minimum school leaving age. For this policy, the minimum school leaving age is defined as the age a child reaches during the school year in which they turn 16 years old.
- **Young Worker (YW):** A person who is over the minimum school leaving age but under 18 years of age.

# Policy Statements'

## Prohibition of Child Labour:

Reflex strictly prohibits the employment or engagement of any child workers as defined above. Verification of age is mandatory for all new hires, conducted through official identification documents such as passports, birth certificates, or national identity cards before employment begins.

If any child labour is identified at any stage, employment or engagement will be terminated immediately. Reflex will take appropriate action to safeguard the child by referring them to a legal guardian or relevant government authority to ensure their protection and wellbeing.

## Supplier Compliance:

All new and existing suppliers are required to provide evidence of their equivalent Child Labour Policy and demonstrate compliance with applicable laws and SEDEX standards.

## Employment of Young Workers:

Reflex complies with all regulations concerning the employment of young workers. A Young Worker Risk Assessment is conducted by the YW's line manager to ensure safety and legal compliance.

Key requirements include:

- Two consecutive days off per week.
- A minimum of 12 hours rest between shifts.
- At least a 30-minute break during shifts longer than 4.5 hours.
- Maximum working hours of 8 hours per day and 40 hours per week (excluding breaks).
- No night shifts permitted.
- Payment at or above the relevant National Minimum Wage.
- Statutory annual leave entitlement, which must be taken.
- Continued education or approved work-based learning (e.g., apprenticeships) until age 18.
- Prohibition from operating machinery restricted to those aged 18 or over.



## Remediation Plan for Child Labour:

If child labour is detected, Reflex will take immediate and responsible action, including:

- Compiling a comprehensive list of all identified child labourers.
- Conducting a full investigation to understand how child labour occurred within our operations or supply chain.

Reflex will collaborate closely with the supplier and qualified organizations to develop and implement a remediation plan that prioritizes the child's best interests. This plan will follow best practices and address the educational, social, and economic needs of the child.

The remediation plan may include:

- Providing clear information on legal employment age and rights, reassuring the child about future employment eligibility upon reaching legal working age.
- Supporting enrolment in formal education where possible, ensuring access to appropriate schooling and support services.
- Offering alternative learning opportunities such as vocational training, workshops, and counselling when formal education is not feasible. These services may be extended to the child's family to promote wider awareness and support.

This policy is reviewed regularly to ensure ongoing compliance with SEDEX standards, national laws, and ethical labour practices.

Last Reviewed: August 2025

Next Review: August 2026



Signed By Ian Kendall CEO

