

Child Labour Policy

1. Policy Statement

We are committed to upholding human rights and ethical labour practices. We strictly prohibit child labour in our operations and throughout our supply chain, in alignment with the Sedex Members Ethical Trade Audit (SMETA) methodology and the ETI Base Code.

ILO Compliance Statement

This policy is explicitly aligned with and implemented in accordance with:

- **ILO Convention No. 138 (Minimum Age Convention)**
- **ILO Convention No. 182 (Worst Forms of Child Labour Convention)**

We commit to complying with these conventions across all operations and supply chains, irrespective of local enforcement levels, and to applying whichever standard is higher between international conventions and national law.

2. Purpose

This policy aims to:

- Prevent and eliminate child labour
- Protect children from economic exploitation
- Ensure compliance with Sedex / SMETA requirements, international standards, and local laws
- Set clear expectations for employees, suppliers, and business partners

3. Scope

This policy applies to:

- All employees, agency workers, and contractors
 - All suppliers, subcontractors, and business partners
 - All sites, facilities, and supply chain tiers where goods or services are provided
-

4. Definitions (ETI / SMETA Aligned)

- **Child:** Any person under 15 years of age, or under the legal minimum working age, whichever is higher (ETI Base Code Clause 4).
 - **Child Labour:** Work that is mentally, physically, socially, or morally dangerous or harmful to children, or interferes with schooling.
 - **Young Worker:** A person over the minimum legal working age but under 18 years of age.
-

5. Applicable Standards & References

This policy is aligned with:

- Sedex / SMETA Best Practice Guidance
 - ETI Base Code – Clause 4 (Child Labour Shall Not Be Used)
 - ILO Convention No. 138 (Minimum Age)
 - ILO Convention No. 182 (Worst Forms of Child Labour)
 - United Nations Convention on the Rights of the Child
 - Applicable national labour laws
-

6. Policy Commitments & Requirements

6.1 Minimum Age Controls

- No child below the minimum legal working age shall be employed.
- Robust age verification procedures must be in place prior to employment.
- Copies of age verification documents must be retained securely.

6.2 Young Workers (Under 18)

In line with SMETA requirements:

- Young workers must not perform hazardous, night, or overtime work.
- Working hours must not interfere with compulsory education.
- Health and safety risk assessments must specifically address young workers.
- Appropriate supervision and training must be provided.

6.3 Prohibited Practices

- Forced, bonded, or trafficked child labour
 - Use of children in hazardous or exploitative work
 - Falsification or concealment of age records
-

7. Supplier & Supply Chain Requirements

- Suppliers must comply with this policy and the ETI Base Code.
 - Suppliers must maintain accurate age verification and personnel records.
 - Suppliers must allow announced or unannounced SMETA or equivalent audits.
 - Any identified non-compliance must be addressed through a corrective action plan (CAP).
 - Serious or repeated breaches may result in suspension or termination of business.
-

8. Remediation (SMETA-Compliant)

If child labour is identified:

- The child must be removed immediately from work.
 - Remediation actions must prioritize the best interests of the child.
 - Remediation may include access to education, financial support, or alternative care.
 - The supplier must implement root cause analysis and preventive controls.
 - Progress must be documented and verified.
-

9. Reporting & Grievance Mechanism

- Workers and stakeholders must have access to confidential grievance mechanisms.
 - Reports may be raised without fear of retaliation.
 - All concerns must be investigated promptly and transparently.
-

10. Roles & Responsibilities

- **Senior Management:** Endorse and support policy implementation.
 - **Human Resources:** Age verification, record keeping, and compliance.
 - **Procurement / Supply Chain:** Supplier due diligence and monitoring.
 - **Suppliers:** Compliance with policy and SMETA requirements.
 - **Employees & Workers:** Report concerns or violations.
-

11. Monitoring, Audit & Review

- Compliance will be assessed through SMETA or equivalent ethical audits.
 - Corrective actions will be tracked to closure.
 - This policy will be reviewed regularly to ensure continued alignment with Sedex requirements.
-

12. Approval

This policy is approved by senior management and is effective from the date of publication.



Michael Rowark
Managing Director
Blends Ltd

A handwritten signature in black ink, which appears to read 'Michael Rowark'. The signature is written in a cursive, flowing style.