

# CHILD LABOR REMEDIATION POLICY

---



ASR Group International, Inc.<sup>1</sup> and its subsidiaries (collectively, “[\*ASR Group\*](#)”) are committed to preventing and addressing the use of Child Labor at ASR Group’s facilities and in our supply chains. (See Appendix for definitions).

ASR Group prohibits the use of Child Labor in any of its facilities. ASR Group requires a minimum age of 18 years old for all of its workers, except for Young Persons, age 16 or older, who are hired as apprentices in the U.K. (discussed below). Likewise, ASR Group’s [Ethical Sourcing Policy](#) and [Supplier Code of Conduct](#) expressly prohibit the use of Child Labor by our suppliers and provides, in relevant part, that:

- ASR Group’s policy is to purchase goods and services that are produced and delivered under conditions that uphold fundamental human rights, do not involve the abuse or exploitation of any persons; and are produced, manufactured and sold in accordance with applicable laws.
- Suppliers shall comply with all applicable laws regarding Child Labor. Suppliers shall neither employ anyone under the minimum age or whose employment would interfere with compulsory schooling, nor allow any employee under 18 years old to undertake any Hazardous Work.
- ASR Group’s and its suppliers’ policies and procedures relating to Child Labor shall conform to the provisions of the relevant International Labor Organization (ILO) Standards and The United Nations Universal Declaration of Human Rights.

ASR Group expects its suppliers to undertake credible due diligence and monitor their operations to ensure that their sites and supply chains are free from Child Labor. In addition, ASR Group’s Procurement Terms and Conditions and vendor qualification and setup packages require suppliers to cooperate with any audits conducted by or on behalf of ASR Group to confirm that services are provided and goods are produced without reliance on Child Labor.

---

## Training

Further to the annual training on ASR Group’s [Code of Ethics and Business Conduct](#), ASR Group employees in the U.K. and Lisbon responsible for managing labor, including contract management through third parties, are trained through Stronger Together, a multi-stakeholder initiative aiming to reduce hidden forced labor, labor trafficking and other third-party exploitation of workers.

---

## Reporting Mechanism

ASR Group maintains various communication channels for internal and external stakeholders to report or submit grievances to ASR Group as to actual or suspected

---

<sup>1</sup> ASR Group International, Inc. is a holding company that conducts operations through its subsidiaries.

human rights, ethics or legal concerns, including, but not limited to, Child Labor concerns. Such communication channels include ASR Group's Ethics Hotline, which provides employees with a method of reporting such concerns (anonymously, if the reporter chooses to do so) through an independent third-party. The Ethics Hotline is available globally, twenty-four (24) hours a day, seven (7) days a week, and reports can be made through toll-free numbers, email or a web-based entry. External stakeholders can submit grievances via a web-based email mechanism.

Following a report or discovery of Child Labor at an ASR Group facility, ASR Group shall promptly take appropriate corrective action and execute a remediation plan that includes the actions outlined below. Likewise, ASR Group shall provide its suppliers with a copy of this policy and notify its suppliers of ASR Group's expectation that suppliers will take the same or similar actions if Child Labor is found at supplier's sites or facilities.

---

## Immediate Steps to Protect Children and Young Persons

If Child Labor is discovered at an ASR Group site, ASR Group shall take the following immediate steps:

- Promptly inform the relevant ASR Group Human Resources representative, and ASR Group's Corporate Social Responsibility Department ([ESGGM@asr-group.com](mailto:ESGGM@asr-group.com)), of the matter.
- If a Child is found to be working at ASR Group, ensure, through the relevant HR representative, that (1) the Child immediately stops work and the Child's employment is terminated, (2) the Child is provided a clear explanation of immediate next steps, and (3) the appropriate federal, state or local agencies whose responsibilities include caring for such Child and taking remedial actions in such circumstances are promptly notified.
- If a Young Person is found to be engaging in Hazardous Work at ASR Group, ensure, through the relevant HR representative, that the Young Person is (1) immediately removed from such Hazardous Work, and (2) offered non-Hazardous Work, without reducing salary or benefits.
- Promptly undertake a full review of all site personnel records and create a list of all potential Child and Young Person workers, if any, and take the same corrective actions outlined above with respect to any other potential Child or Young Person workers.
- In the case of a Child found to be working at ASR Group, promptly initiate a root cause investigation to determine how the Child was able to obtain employment in violation of ASR Group codes and policies and take appropriate corrective measures to avoid similar situations in the future.
- In the case of a Young Person found to be engaged in Hazardous Work, promptly initiate a root cause investigation to determine how and why the Young Person was engaged in Hazardous Work in violation of ASR Group codes

policies, and take appropriate corrective measures to avoid similar situations in the future.

---

## Design & Implementation of a Remediation Plan

If a Child is discovered to be working at an ASR Group site, ASR Group's HR and/or Corporate Social Responsibility departments shall implement the following remedial actions:

- Explain the restrictions on working ages to the child and assure the Child that, if the Child wishes, the Child may apply for open positions with ASR Group after the child reaches the legal minimum working age.
- Cooperate with local authorities and relevant child protection agencies to assist the authorities and/or agencies to ensure the Child's safety.
- Document all actions taken in support of remediation.
- Inform relevant internal stakeholders.
- Record any and all instances of Child Labor discovered at a site at the next SMETA audit.

If a Young Person is discovered to be engaging in Hazardous Work at an ASR Group site, ASR Group's HR and/or Corporate Social Responsibility Departments shall implement the following remedial actions:

- Explain the restrictions on Hazardous Work to the Young Person and to relevant supervisors who assign work to Young Persons.
- Ensure that the Young Person will no longer engage in, or be assigned to, Hazardous Work.
- Document all actions taken in support of remediation.
- Inform relevant internal stakeholders.
- Record any and all instances of such Child Labor discovered at a site at the next SMETA audit.

---

## Ongoing Actions and Monitoring

ASR Group shall continue to take the following ongoing actions and monitoring to ensure that there is no Child Labor at its sites:

- Roles and responsibilities are assigned to guide policy implementation and ensure accountability, with skilled personnel allocated to implement and monitor compliance.
- Internal systems are in place for tracking progress.
- Verify the age of all workers, and ensure that all workers are age 18 or older (with the exception of Young Person apprentices in the U.K. – discussed below).

The Company relies on self-disclosure during the job application process, third-party background checks after an offer has been made, and then government accredited processes to confirm age eligibility.

- Undertake annual third-party compliance validation of its facilities via SMETA social audits.
- Apply lessons learned from any incidents to prevent future recruitment or hiring of Children, or to prevent Young Persons from engaging in Hazardous Work, including, but not limited to, monitoring Young Persons' work regularly to ensure their work does not include any Hazardous Work.
- ASR Group further commits not to do any of the following, and to inform its suppliers that it has the same expectation of them – ASR Group shall not:
  - Recruit or hire Child laborers;
  - Conceal any of the suspected or confirmed Child laborers;
  - Threaten the Child or the Child's family;
  - Interfere with any part of the assessment or remediation process;
  - Conceal or falsify any documentation; nor
  - Allow Young Persons to engage in Hazardous Work.

---

## Youth Apprenticeship Program in the U.K.

ASR Group may occasionally employ Young Persons (age 16 or older) in the U.K. who are pursuing an apprenticeship - a vocational qualification that requires continuing study alongside practical work experience. In these circumstances, written statement of employment particulars will be provided, and all legal requirements strictly adhered to.

---

## Follow-up Monitoring

ASR Group partners with local NGOs and child welfare organizations to track the child's progress post-remediation to ensure long-term well-being.

## APPENDIX

### Definitions

**Child:** Any person 15 or less years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

**Young Person:** Any worker over the age of a Child as defined above and under the age of 18.

**Child Labor:** Any work by a Child as defined above, or any work by a Young Person that is likely to be Hazardous Work.

**Hazardous Work:** Any work that is likely to be hazardous or to interfere with a Young Person's education or to be harmful to the Young Person's health or physical, mental, spiritual, moral or social development. Examples of Hazardous Work includes but is not limited to: underground work, underwater work, work at dangerous heights or in confined spaces; work in unhealthy environments such as extreme temperatures, loud noise, excessive dust; work with dangerous machinery, chemicals, vibration equipment or electricity; handling heavy loads; working overtime or working at night; or hazardous work for young workers that is not permitted by local laws and regulations.