

## **CHILD LABOUR POLICY**

Active Research Ltd. is committed to respecting human and subsequently children's rights.

We strongly believe children should grow up loved, cherished, and able to enjoy their childhood in a strong caring community. Active Research Ltd. will not knowingly tolerate child labour activities in any areas of its operations, including its supply chains.

Additionally, Active Research Ltd. does not tolerate children being exposed to any other risk in production sites used for our products.

This Child Labour Policy is based on:

- The United Nations Convention on the Rights of the Child (UNCRC).
- International Labour Organization (ILO) Conventions No 138 (Minimum Age) and No 182 (Worst Forms of Child Labour).

Active Research Ltd. will review and update this policy at regular intervals to ensure compliance with changing laws and regulations.

## **1 TERMS & DEFINITIONS**

Child:	The UNCRC defines a child as: "Every human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier".
Minimum working age:	According to the ILO, no person shall work at an age younger than 15, unless exceptions recognised by the ILO apply, or national laws apply, whichever is most stringent.
Juvenile worker:	According to the ILO, a "juvenile worker" is defined as a worker who has reached the minimum working age but is not yet 18 years old.
Child labour:	According to the ILO, "child labour" is defined as work that "deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development".
	This includes:
	• Any child below the minimum working age engaged in non-light work, and

Juvenile workers engaged in hazardous work.

Light work:	In compliance with the ILO conventions, UNCRC, national laws and regulations, Active Research Ltd. would allow the work of children aged 13 to 15 years (unless exceptions by the ILO or national laws apply, whichever is most stringent). The work is only permitted if it happens outside of school hours, falls into the category of light work, and fulfils the following criteria:
	<ul> <li>It must be age-appropriate and must not threaten the child's health or development.</li> <li>It must be in line with children's rights. The work should not negatively impact the development and education of the child. It should not compromise their attendance at school or time dedicated to homework, playtime, and sleeping time, their participation in vocational, orientation, or training programmes.</li> <li>It must not take place on a continuous basis (e.g. it should only take place after school or during holidays) and must take place under non-exploitive conditions.</li> </ul>
Hazardous work:	According to the ILO, "hazardous work" is defined as any kind of work that might be prejudicial to a person's health, safety, morals, and development including, but not limited to, night shifts, overtime, moving heavy objects, exposure to extreme temperature and noise, and handling dangerous machinery.
Production site:	Production sites are defined as any site that is used for the production of products sold by Active Research Ltd.
Hours of work:	The hours of work completed should not exceed those enforced by the country or region (whichever is the strictest) where the child is working.

## 2 EXPECTATIONS OF BUSINESS PARTNERS AND SUPPLIERS

We would expect all business partners and suppliers to ensure that child labour does not knowingly occur in the manufacturing, supply, or the transport of any goods or services supplied to Active Research Ltd. and that they have respective systems, policies, and processes in place.

Business partners should ensure that production sites used for Active Research Ltd. have the following measures in place, at a minimum:

- An employment policy as a basis for hiring decisions at all levels, which explicitly states the minimum age for work and fully respects juvenile workers' rights at work.
- A robust age verification mechanism as part of the recruitment process.
- A juvenile worker listing with names, dates of birth, and current job position.
- A list of age-appropriate job positions for juvenile workers.



Additionally, business partners must:

- Ensure that children below the minimum working age are not placed at any risk at production sites and are not situated in production areas.
- A clear delineation between non-production areas (e.g. childcare facilities) and production areas should be ensured.
- Inform Active Research Ltd. proactively of any risks related to child labour at production sites used for Active Research Ltd.

## **3 PROCESS UPON IDENTIFICATION OF CHILD LABOUR**

If child labour is found at a production site producing for Active Research Ltd., together with local expert organisations and our business partners, we will seek a solution which is in the best interests of the child and their family. Business partners and production sites are required to develop and implement a plan to prevent any future cases of child labour. Production sites must not be used for further Active Research Ltd. production until the situation has been remediated satisfactorily.

Phil Whitehurst Chief Executive Officer August 2023