

| Name | Child Labour and Young Worker Policy |
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| Ref | PS-003-WB-UED |
| ISSUE DATE | 06/12/2024 |
| REVISION NO | 1 |
| PREPARE BY: | SM |
| APPROVE | RM |

Policy Statement

Our Child Labour and Young Workers Policy is our position on employing minors, and aims to ensure that Westbank businesses and everyone we are connected with follows the law and cares for children's interests. We recognise that millions of children are still forced to work in bad conditions all around the world, even in developed countries.

At Westbank group, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labour, and treating young people in our employment with respect, is part of that commitment. We want to make sure that our Westbank group doesn't take part in children's exploitation and also helps end it to the best of our ability.

Scope

This policy applies to our entire Westbank group businesses working only with suppliers, contractors and partners who are approved and monitor every year as part of our Integrated Management System. In a case of employ young people special plan is applied and approved.

Definitions apply to this policy

- a child is a person under the age of 16
- a young person is anyone aged 16 or 17

Employment of Young People

- Westbank group may employ a person under the age of 18, either as an apprentice, for work experience or for work. However, due to the nature of the work carried out is limited in the work that can be offered to young workers.
- If WestBank Businesses does employ young workers, it has the same responsibilities for the health and safety of young workers as we do for other employees.
- We acknowledge that the law is in place to protect the health of young workers and ensure that work carried out during school years does not put young people's education at risk.
- WestBank Businesses complies with this legislation and as such will consider the legislation prior to offering employment to any young worker.

We are fully committed to adhering to the law in respect of

- Who is regarded as a young person
- The rights of young people
- Record keeping
- Any additional requirements which are in place at any time

Young Worker Rights

 Young workers have a number of additional rights and different rights from workers over the age of 18.

These are:

• The maximum working week for young people aged 16 and 17 is 40 hours with a maximum of 8 hours a day.



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- If a young person under 18 works for more than one employer, the combined daily or weekly hours of work cannot exceed the maximum number of hours allowed.
- Young persons are only permitted to work between 6am and 10pm

a daily rest break of 12 consecutive hours. This is the gap in time between finishing work one day and starting work the next

- A weekly rest break of 48 hours
- After every 4.5 hours, the young worker is entitled to a minimum 30-minute rest break

Additional requirements

As required by legislation we will provide the following:

- Employers must give employees aged under 18 years a copy of the official summary of the protection of Young Persons (Employment Act) along with other details of their terms of employment.
- Employers with employees under 18 must also display the official summary of the Act at a place in their workplace where it can be easily read.

Health and safety

- WestBank Businesses has the same responsibilities for younger workers health and safety as it does for all workers.
- WestBank Businesses recognises that many younger workers will be unfamiliar with business risks and with workplace behaviours expected of them.
- WestBank Businesses will arrange, as appropriate, for additional help and training to allow younger workers to carry out their work without putting themselves and others at risk.
- WestBank Businesses will ensure that young workers are appropriately supervised at all times and may place age limits and usage restrictions on some equipment and machinery, and some vehicles such as forklift trucks.
- WestBank Businesses will carry out a risk assessment for the job role before a young worker begins employment. The risk assessment and any necessary control measures implemented will be communicated to the young worker's parent or guardian.

Actions and Implementation

To make sure we enforce this policy and help eliminate child labour, we're committed to:

- Educating our staff on youth work laws and show them how to report child labour if they see or suspect it.
- Requiring hiring managers and HR to avoid hiring minors under the legal age for working. We also expect them to know and follow this policy and laws on wages and hours for older children.
- Keeping and validating documentation verifying our employees' age after they're hired.
 If we discover that we've hired a minor under the age of 18, we'll review applicable
 laws and adjust working hours accordingly. If we need to let the child go, we'll assess
 their situation and make sure to provide for them to the best of our ability (e.g. pay him
 or her their would-be salary for a couple of months) when necessary.
- Communicating our no child labour policy to organisations we're connected with and ensure our contracts have the right stipulations.
- Auditing suppliers and partners periodically to ensure they aren't involved in child labour, possibly with planed onsite visits too. We'll require them to provide us with an



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updated list of all their business locations at all times. If we discover hidden business sites that employ children, we'll dissolve our contract immediately.

• Demanding and monitoring an elimination plan in cases where suppliers discover child labour in their business. We'll also work together with the stakeholder to create plans to support children, keeping their best interests in mind, and make efforts to involve them and their families in the process.

Records to be kept

In compliance with legislation WestBank Businesses will keep records for every employee under the age of 18 that contains the following information:

- The employee's full name
- The employee's date of birth
- The employee's starting and finishing times for work
- The wage rate and total wages paid to the employee

Children's Welfare is Everyone's Business

WestBank Businesses want to grow and thrive as a business, but we're also committed to do good by the community we belong in. We ask all of our employees and partners to follow this policy, not just because we demand it as an Organisation, but because securing a bright future for children is everyone's duty.

Andrew Reeks
Operations Director

Signature

06/12/2024