

OROTON CHILD LABOUR Policy

Oroton is committed to conducting its business with the highest standards of integrity and will only work with suppliers who share and follow our high standards of ethical business behavior and who demonstrate commitment to those standards.

Oroton expects that child labour will not be used by vendors, factories or authorised sub-contractors (“suppliers”) at any stage of the production process of its products. This Child Labour Policy demonstrates our commitment to the elimination of the worst forms of child labour and our remediation plan for any identified instance of child labour in our end to end supply chain.

We align our expectations for elimination of the worst forms of Child Labour in accordance with the International Labour Organisation Conventions:

- C138 - Minimum Age Convention, 1973 (No. 138)
- C182 - Worst Forms of Child Labour Convention, 1999 (No. 182)

This Policy applies to all vendors, factories or authorised sub-contractors (“suppliers”) in all Regions involved in the manufacturing of Oroton proprietary branded and licensed merchandise sold by Oroton or any authorised seller.

Through our Ethical Sourcing Policy and Supplier Code of Conduct, Oroton commit to:

- Adhere to all rules, laws and conventions which govern the behavior of our Vendors and Sub-Contractors concerning child labour;
- Undertake periodic risk assessments to identify where there is a greater likelihood of the presence of child labour in our supply chain;
- Educate all stakeholders on our expectations of our Child Labour Policies and Procedures;
- Adhere to the minimum age provisions of national/international labour laws and regulations concerning child labour;
- Implement our Child Labour Remediation Plan when a case of Child Labour is identified;

Vendors and Sub-Contractors to Oroton will:

- Comply with the minimum employment age limits defined by national law or by International Labour Organization (ILO) Convention 138, whichever is higher;
- Adhere to ILO Convention 138. ensuring the minimum employment age is the local mandatory schooling age, but not less than 16 years of age;
- Ensure hazardous work is not undertaken by anyone under the age of 18;
- Comply with all legal restrictions placed on young/juvenile workers including the number of overtime hours, hazardous and/or night work, annual medical checkups, and taking all necessary precautions to ensure juvenile workers are protected from working conditions likely to endanger their health, safety or welfare;
- Implement hiring procedures to verify age documentation;
- Ensure all factories hold all relevant documentation to verify the date of birth of all workers;

Should an instance of child labour be identified, the Supplier (and factory) must implement the following Child Labour Remediation Plan :

- The Supplier must advise Oroton immediately of any breach of our Ethical Sourcing or Child Labour Policies;
- Engage with civil society to assist with the remediation program of the affected workers as required;

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- Remove the child/ren from the factory or work location;
- Enroll the child/ren in a local school;
- Support the child through the payment of school fees and a monthly wage equivalent to the legal monthly minimum wage while attending full time schooling (until the child turns 16 years of age);
- Seek to offer income generating alternatives for the parents or above working age members of the family.

Oroton will monitor compliance to this Policy and our Ethical Sourcing Policy and we or our representatives, may visit a supplier's factories to audit compliance of any part of this Policy to ensure our business expectations are being upheld. These visits may occur at any time and be announced or unannounced.

Oroton always expects suppliers to co-operate, to be honest and transparent in their dealings with Oroton and commit to making continuous improvements in their operations. Any breaches of this Policy or our Ethical Sourcing Policy will be reported to the supplier for follow up and corrective action. Where there are breaches and/or the supplier does not demonstrate a willingness to comply, Oroton reserves the right to discontinue business with the supplier.

This Oroton Policy and Ethical Sourcing Code does not replace the local laws of the countries in which our suppliers operate. At a minimum, suppliers should always be familiar with and comply with all relevant laws and regulations. In the event of a conflict between these standards and a local law, the stricter requirement must be followed.

Without support, children found working in factories may be forced into worse circumstances such as prostitution and in some instances, where children are the sole providers of income, their immediate removal from work may exacerbate rather than relieve the hardship experienced by the worker and their family. For this reason, Oroton commits to investigate and resolve any identified case of child labour on a case by case basis.

The complete Oroton Ethical Sourcing Policy and Supplier Code of Conduct, can be obtained by visiting www.oroiongroup.com

This Policy should be applied with all Oroton Policies and social compliance expectations and operates within the legal and regulatory requirements of the Country in which Oroton, our Suppliers and Sub-Contractors operate.