



No Child Labour Policy

Background

Swannдри's 'No Child-Labour Policy' is based on the Company's commitment to find practical, meaningful and culturally appropriate responses to support the elimination of child, or under age labour practices. This policy has been founded on best practices and endorses the need for appropriate initiatives to eliminate child, under age and forced labour abuses.

At Swannдри, we believe that every child has a right to attend education, and to experience a care-free childhood, and their wellbeing and safety should not be put at risk.

Definition

The International Labor Organization describes the term "child labour" as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their education

Policy

Swannдри New Zealand Ltd prohibits the use of child or under age labour (as guided by law in any given country). Swannдри expects all suppliers and subcontractors to follow this policy, and all local legal requirements.

Any workers under the age of 18, should not participate in high risk, or unsafe activities, and should not be required to work overnight shifts.

Implementation

This policy shall be clearly communicated to all employees and suppliers, in a manner in which it can be understood. There is zero tolerance policy towards its breach.

Swannдри will cease business immediately with any supplier that engages in child, or under age labour. A remediation plan with the supplier shall be developed in cooperation with Swannдри and other third parties, to help, first and foremost ensure the safety and protection of the child. A corrective action and remediation plan will then be developed in conjunction with the supplier, and will be monitored and audited at regular intervals to ensure there are no ongoing occurrences, and any practices of this kind are ceased.

Monitoring & Audit

Assessment and monitoring are conducted as part of the Swannдри social compliance monitoring. If an incident occurs, or is suspected, then Swannдри reserves the right to increase their monitoring of any facility to ensure there are no breaches to this Policy.

Remediation

In the rare chance that child labour is found in or connected to your facility, we will seek to work in partnership with you and other appropriately qualified organisations, to develop a solution that has the best long-term interests of the child. A corrective action plan will be developed, which may comprise of the following actions:

- Once child labour has been confirmed, the child should be immediately removed from the workplace, and kept in a safe place until remediation has been confirmed.
- Swandri should be notified of any possible or suspected cases of child labour, and all business relationships to be halted until a remediation plan has been developed.
- Focus on the child's welfare, develop an understanding of each child's needs and aspirations, seek their parents' view, and develop effective solutions.
- Swandri will partner with NGOs and other third party organisations on the ground to create and implement a responsible solution for the child, by selecting appropriate schooling, negotiating financial support, and monitoring the child's development over time.
- Swandri will be sensitive to the fact that the child may be working to support their family, and will work with local organisations to help remediate any lost wages for the family, in conjunction with the supplier.
- Swandri will work with suppliers and other third parties to help develop a corrective action plan for the supplier, and to help ensure procedures are in place to prevent any further issues.
- Undertake ongoing monitoring and audits

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