Child Labour and Young Worker Policy

Implementation date:	October 2026
Next review date:	October 2027
Accountable owner:	Chief People Officer
Responsible owner:	Head of ESG

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1. Policy Statement

This Policy establishes a set of principles and rules adopted by The Very Group Limited in relation to Child Labour and Young Workers. This Policy is designed to influence all decisions, actions and other activities that relate to its subject matter.

The primary objectives of this Policy are to:

- Outline applicable requirements and The Very Group's commitments relevant to the subject matter of this Policy
- Identify key roles and responsibilities for both The Very Group and its Suppliers
- Define how The Very Group will comply with the above requirements

Scope
This Policy applies to the entire supply chain of The Very Group, which includes lower production tiers and raw material producers.

Related Policies
The Very Group Code of Conduct
Migrant Worker Recruitment Policy

Additional Information
ILO Conventions on Child Labour 138 and 182
United Nations Guiding Principles on Business and Human Rights (UNGPs)
OECD Due Diligence Guidelines for Responsible Business Conduct
ETI Base Code

Background

The Very Group is committed to respecting and protecting the rights of children throughout its operations and supply chains. We prohibit the use of child labour in accordance with International Labour Organisation (ILO) Conventions 138 and 182. We believe that no child should be deprived of their childhood, dignity, education, health and safety, or development opportunities through work that is inappropriate for their age or harmful to their physical, mental, social, or moral wellbeing.

As members of the Ethical Trading Initiative (ETI) and a partner of the Centre for Child Rights in Business (CRIB), The Very Group is committed to protecting the rights of children and young workers.

We recognise the risk of child labour in global supply chains and where child labour is identified, The Very Group is committed to ensuring remediation in the best interests of the child.

2. Definitions

Child

Any person under the age of 15, or under a higher minimum age where required by national or local law for the completion of compulsory education or entry into full-time employment. In limited circumstances, where national law permits a minimum working age of 14 years, the exception provided under ILO Convention 138 for certain developing countries may apply.

Young Worker

A person who is legally entitled to work, has reached the minimum legal age for employment under applicable law and is under the age of 18 years. Young workers are entitled to additional protections to ensure that work does not jeopardise their health, safety, education or development (ILO Convention 138).

Child Labour

Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development (ILO).

Hazardous Work
Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, wellbeing or moral development of a child or young workers. This may include exposure to hazardous chemicals, dangerous machinery or electrical equipment, work in confined spaces, at heights or in extreme temperature, exposure to excessive noise, dust, fumes or other harmful substances, manual handling of heavy loads, excessive working hours, overtime, or night work. Such work must not be undertaken by anyone under the age of 18.

Supplier
An organisation that manufactures or procures goods or services on behalf of The Very Group.

3. Key requirements

The Very Group expects all suppliers and service providers to uphold the requirements of this Policy and to operate effective management systems to identify, assess, prevent, mitigate and remediate child labour risks. Suppliers must comply with all applicable laws and regulations, and where national law differs from international standards, apply the higher standard where legally permissible.

Key requirements of this Policy are:

- Child labour must not be used
- Access to the production areas by children under legal working age is prohibited
- Young workers must not carry out any form of hazardous work
- Use of labour agents for young workers is prohibited

The Very Group expects suppliers notify to us immediately of any actual of suspected instances of child labour. Where child labour is identified, Suppliers must work collaboratively with The Very Group and relevant stakeholders to implement a time-bound remediation programme that is developed in the best interests of the child, protecting them from further harm and supports their education, development and long-term wellbeing.

The Very Group encourages the use of work-based training programmes that provides young workers access to employment. These programmes should be aimed at skills development and work experience ensuring that the applicable minimum wage is paid, including for any training time.

4. What does this mean to The Very Group?

The Very Group will support our suppliers who provide transparency, disclose any discoveries or risks within their operations or supply chain, and actively engage with us in ongoing due diligence and delivering remediation where necessary. The Very Group is committed to communicating this policy to relevant internal and external stakeholders.

Where child labour is identified, The Very Group will work with the child, their family or guardians, the employer and relevant stakeholders including local NGOs or CSOs, to establish an appropriate remediation programme prioritising the child's wellbeing and education. We will seek to provide a responsible solution to ensure there is no financial detriment to the child or their dependents and no breach of their human rights.

The Very Group will cease its relationship with business partners or suppliers if they fail to address identified risks, obstruct remediation efforts or demonstrate a lack of commitment to meeting the requirements or they are in deliberate breach of this Policy.

5. What does this mean for suppliers?

Suppliers are expected to monitor and conduct due diligence on their own operations and supply chains to identify, prevent, mitigate and address child labour risks. Suppliers must notify The Very Group immediately if they become aware of, or suspect, any instance of child labour or exploitation of young workers within their own operations or supply chain.

Management systems

Suppliers must have an effective management system to prevent child labour, including:

- Recruitment and age-verification procedures that use all available methods to verify the authenticity and accuracy of proof of age documentation such as birth

certificates, passports and national identity cards.

- Maintain accurate and up-to-date records of all employees detailing their full name, department, identification document details, date of birth, and employment start date
- Maintain a separate register of all young workers, including the date they will reach adulthood
- Appropriate controls and risk assessments in place to ensure young workers are protected from harm and do not undertake hazardous work
- Ensure that labour agents are not used in the recruitment of young workers

Identification

If the Supplier suspects that a worker may be underage, they should not approach the individual directly but first conduct discreet age-verification checks to determine their age.

Checks may include:

- Documentation review
- Engagement with parents and guardians of children or young workers
- Contacting local labour authorities to validate identification

If child labour is suspected or confirmed, or a young worker is suspected or confirmed to be undertaking hazardous work, the Supplier must immediately notify The Very Group ESG team.

5.1 Child labour

Immediate actions

Where child labour is confirmed, the Supplier must:

- Remove the child from all work immediately and ensure the child is in a safe environment, and their welfare needs are met.
- Obtain the contact details and home address of child and their parents/guardian
- Where age verification remains inconclusive, remove the individual from work until verifiable evidence is provided.
- Inform the child of what is happening and why, ensure their needs are respected,

provide them with information about available support and remediation options, and obtain their participation in the remediation programme.

Remediation

Suppliers are required to work collaboratively with The Very Group, rights-holders and relevant statehooders to develop a remediation programme in the best interests of the child. The child must be consulted throughout the process.

The Supplier must:

- Obtain commitment from factory management to support the remediation programme
- Provide food and safe accommodation at no cost for the child until a remediation programme is operational and long-term arrangements are established.
- Arrange and maintain financial support through a regular stipend equivalent to the child's previous earnings or the applicable minimum wage, whichever is higher, paid weekly or monthly.
- Engage with parents or guardians to explain the remediation process, available support and importance of education or vocational training and ensure they understand and agree to the remediation programme.
- Provide psychosocial support and where appropriate, skills development opportunities
- Review all the personnel records at the workplace to identify whether there are any other child workers
- Strengthen age-verification and recruitment processes to prevent recurrence including training for factory management, HR personnel and workers.

The Very Group expects its Suppliers to take immediate action upon discovering child labour within their supply chain by promptly orchestrating and initiating a comprehensive remediation programme.

Remediation team

A remediation team must be established to oversee the development and implementation of the remediation programme.

The remediation team should include representatives from:

- Supplier or agent
- Factory
- The Very Group
- Local NGO or child rights organisations
- Trade unions or worker representatives
- Other local experts

The remediation team should define clear responsibilities, governance arrangements and funding commitments. Existing local government, NGO or community programmes should be engaged with in order to avoid duplication of efforts and maximise support.

Protecting the child's welfare is the first priority for any remediation programme. It is vital to understand the individual circumstances and root causes that led to the child's employment, to support the transition into education and reduce the risk of re-entry into child labour.

Ongoing monitoring & reporting

Suppliers are responsible for ensuring that remediation remains effective until the child reaches legal working age. Monitoring may be undertaken by the Supplier or an independent third party such as an NGO, trade union or child rights organisation.

Monitoring activities include:

- Reviewing school attendance, exam results, school reports
- Engagement with teachers, parents or guardians
- Home visits by an appropriately trained independent representative such as a child rights organisation, and assessment of the child's wellbeing
- Ongoing payments of stipends, school fees and other associated agreed costs
- Facilitate visits by The Very Group where appropriate

Suppliers must provide regular updates to The Very Group on the implementation and effectiveness of the remediation programme until the child reaches legal working age or the programme has been formally concluded and agreed by all relevant stakeholders.

5.2 Young workers

The Very Group supports access to employment for young workers and expects its Suppliers to ensure that any work carried out is not likely to harm their health, safety or morals.

Where a young worker is identified to be undertaking hazardous work, the Supplier must:

- Remove the young worker from hazardous work immediately and re-assign to an appropriate non-hazardous role, as determined by an occupational risk assessment
- Conduct a health assessment to determine whether the young worker's health, safety or wellbeing has been adversely impacted, providing any necessary support or remediation
- Identify and address root causes and update risk assessments, controls and management systems to prevent recurrence
- Young workers must not undertake night work, excessive overtime or any activity that interferes with compulsory education, where applicable

If the Supplier is found in breach of this Policy, then The Very Group reserves the right to suspend the relationship until these issues are rectified. If suitable progress is not made in remediating issues found, then The Very Group may cease our trading relationship with the supplier indefinitely.