



Child Labour Policy

At Town & Country Aggregates we are committed to respecting human and subsequently children's rights. Town & Country Aggregates acknowledges that every child has the rights, among others, to a healthy and safe environment with access to education, play and recreation, an adequate standard of living and to be protected from abuse and harm. Town & Country Aggregates does not tolerate child labour in any areas of its operations, including its supply chains. Additionally, Town & Country Aggregates does not tolerate children being exposed to any other risk in supply sites used for our products.

The Town & Country Aggregates Child Labour Policy is based on:

- The United Nations Convention on the Rights of the Child (UNCRC)
- International Labour Organisation (ILO) Conventions No 138 (Minimum Age) and No 182 (Worst Forms of Child Labour).
- The Children's Rights and Business Principles.

1. Terms and Definitions

Town & Country Aggregates will review and update this policy at regular intervals to ensure compliance with changing laws and regulations.

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 ILO conventions, UNCRC, national laws and regulations, Town & Country Aggregates permits the work of children aged 13 to 15 years (unless exceptions by the ILO or national laws apply, whichever is most stringent) to assist on the farm. The work is only permitted if it happens outside of school hours, falls into the category of light work and fulfils the following criteria:

- It must be age-appropriate and must not threaten the child's health or development.
- 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, the participation in vocational orientation or training programmes.
- 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.
- It must be supervised by either the child's parents or guardians, who can ensure the tasks provided to children are not harmful to their current and future health, physical development or interfere with their schooling.

As of January 2023 at Town & Country Aggregates no farm work/farmers are used within the supply chain.

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.

Supply site: Supply sites are defined as any site that is used for the production of products sold by Town & Country Aggregates.

Where local laws and regulations conflict with, or set a different standard compared to international standards (such as applicable ILO or UN Conventions) the principles that provide the highest protection to children apply.



2. Town & Country Aggregates expectations of business partners regarding prevention of child labour

All of Town & Country's business partners must ensure that child labour does not occur at supply sites used for Town & Country Aggregates.

Business partners and their partners should have respective systems, policies and processes in place. This includes the prevention of children performing work, which is classified as child labour, anywhere within the supply site premises, even if carried out on behalf of a third party rather than the supply site. Business partners should also ensure that supply sites do not exclude juvenile workers based solely on their age. A sound hiring , positioning of and safe working environment for juvenile workers should be ensured.

Business partners should ensure that the supply sites used for Town & Country Aggregates 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 names, date 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 supply sites and are not situated in supply areas.
- A clear delineation between non-supply areas (e.g childcare facilities) and supply areas should be ensured.
- Inform Town & Country Aggregates proactively of any risks related to child labourite supply sites used for Town & Country Aggregates.

3. Town & Country aggregates further activities to prevent and address child labour

As of January 2023 Town & Country Aggregates will regularly conduct its own social assessments of supply sites producing for Town & Country Aggregates.

We will establish suppliers and business partners within Town & Country Aggregates do not tolerate the use of unlawful child labour.

Due to the nature of our work at Town & Country Aggregates we do not employ anyone under the age of 17 years old.

If child labour should be found in the supply chain of Town & Country Aggregates we will seek to work in partnership with the supplier and appropriately qualified organisations to develop a responsible solution that is in the best long term interests of the children. The supplier and Town & Country Aggregates will agree a corrective action plan, which may comprise the following, but not exhaustive; actions:

- Take immediate action to minimise the risk to child(ren) by removing them from the production area and/or stopping there work.
- Collate a list of all potential child labourers and young workers.
- Seek advice and help from a recognised local non-government organisation that deals with child labour and the welfare of children.
- Develop a remediation action plan that secures the children's education and protects their economic well-being, in consultation with Town & Country Aggregates and where possible with local NGO, and in consultation with and respecting the views of the child.
- Explain the legal requirements and restrictions on working ages to the affected children and assure them that, if they wish, they will be employed by the facility in question when they reach local law legal working age.
- Understand the children's desires and explore the opportunities for them to re-enter education.
- Whether the child contributes to the livelihoods of their family or they are self-dependant, his or her wage should continue to be paid by the affected facility until such time as they reach local law working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an unemployed adult family member in place the child labourer)
- Ensure that the child worker has adequate accommodation and living conditions.
- Ensure that this remediation policy procedure if enacted due to child labour being discovered is monitored and policed at all times until such time as the child is no longer classed as at risk or classed as a child.

If Child labour is found within Town & Country Aggregates we will do our utmost to work with qualified organisations to develop a responsible solution, we will follow the corrective action plan (listed on the bullet points above).

