



**+ Child Labour and
Young Worker Policy**

2021 Edition



About Pentland Brands Ltd

Pentland Brands Ltd is the brand management division of Pentland Group Limited.

Our brands include Berghaus, Canterbury of New Zealand, ellesse, Endura, KangaROOS, Mitre, SeaVees, Speedo and Red or Dead. We are the UK licensee for Kickers and in a joint venture with Lacoste.

Contents	
Section	Page Number
Introduction	4
Child Labour and Young Worker Definitions	5
Our Commitment	6
Our Expectations	7
Supplier and Partner Responsibilities	8
Child Labour Remediation	10
Contacts	10



Introduction

Building a sustainable business has never been more important. It's also the right thing to do, and our stakeholders expect it.

Pentland Brands aims to clearly document its policy and expectations relating to the employment of children and young workers within its operations, and those of its partners and supply chains.

Pentland Brands believes that it is its responsibility to ensure the welfare and protection of any child or young person identified within its business operations, partnerships, or supply chains.

For any queries, feedback, disclosures or whistleblowing please contact corporate.responsibility@pentland.com

Child Labour & Young Worker Definitions

Child	Pentland Brands defines a child as a person or persons yet to reach their 16th birthday, or any higher age specified in national or local law for completing mandatory schooling or beginning full time work.
Child Worker	A child who is not legally entitled to work, who is below the minimum age of employment or under the age of 16 if this is higher.
Young Person	A person legally entitled to work, who is 16 years old or above the minimum age of employment and below the age of 18.
Hazardous Work	<p>Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of children or young people.</p> <p>This includes handling chemicals, working with heavy machinery or electrics, working in confined spaces, at height or in extreme temperatures, being exposed to dusty environments, fumes, or loud noise, lifting heavy loads, working overtime or working at night.</p>
Child Labour	The term for employment of children, or young workers exposed to hazardous work or conditions.

Our Commitment

Pentland Brands is committed to protecting the rights of young workers and remedying any instances of child labour.

1. Pentland Brands supports the employment of young persons, on condition that they are not subjected to hazardous work or are migrant workers.
2. Pentland Brands is committed to fully and consistently supporting our suppliers/partners who provide transparency on conditions and practices, report any discoveries within their own or their supplier's operations, and actively engage with us in the process of developing and delivering agreed, time bound improvement plans where necessary.
3. In the event of child workers being identified, Pentland Brands will work in partnership with the child, the employer, the parents/carer, and local NGO/experts in providing appropriate welfare and a safe transition back to education.
4. Pentland Brands is prepared to terminate its relationship with business partners or suppliers if it is found they are in deliberate breach of this policy or unprepared to engage with appropriate remedy.
5. We will collaborate to ensure there is no financial detriment to the child, or their dependants, and no breach of their human rights.

Our Expectations

Child workers must not be employed within our business operations, or those of our partners or our suppliers and supply chains.

We have set clear standards relating to the employment of children within our Code of Conduct which reflects the Ethical Trading Initiative (ETI) base code and the International Labour Organisation's (ILO) Conventions 138 and 182 relating to child labour.

Our Code of Conduct states:

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions. 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

4.4 In this Code, "child" means anyone under 16 years of age, unless national or local law stipulates a higher mandatory school leaving or minimum working age, in which case the higher age shall apply; and "child labour" means any work by a child or young person.

Supplier and Partner Responsibilities

Our suppliers/partners are expected to monitor their own operations, and those of their suppliers and service providers, and to contact Pentland Brands if they have any concerns regarding child labour.

Brands in the Pentland portfolio require all suppliers/partners to adopt and implement this policy or have a similar policy of their own.

Supplier/partners should have a management system in place for the prevention of child labour.

This will include:

- Using all available processes to verify the authenticity and accuracy of proof of age documents, i.e., Birth certificates, passports, ID cards etc.
- Maintain a full list of all employees, detailing full names, work department, identification documents and serial numbers, date of birth and date employment commenced.
- Maintain a similar list of all young workers, including date they will reach adulthood.
- Prevent access to the production areas by child under legal working age. This includes the children of workers who live in factory accommodation and/or children brought to care facilities on site.
- Ensure any young worker employed has adequate precautions to protect them while carrying out non-hazardous work and ensure they do not perform hazardous work.

If child labour is identified or suspected, we expect our suppliers/partners to protect the welfare and living conditions of all suspected or confirmed child labourers and take the following actions:

- Report all child labour discoveries to Pentland Brands,
- Provide a list of all child names and actual dates of birth.
- Explain the legal and policy requirements, and the restrictions on working ages to the child clearly, and in a language they fully understand.
- Remove the child from work and ensure suitable housing and meals are provided.
- Consult with child and their guardians to establish what they want.
- Support the child/ren through wage compensation on at least a monthly basis until legal working age so that the child/ren do not need to work in any other factory.

- Document all actions and transactions, including payslips, bank transfers and any receipts
- Review copies of ID card of all employees
- Develop /review age verification procedure to prevent recurrence.
- Collaborate fully with the child labour remediation programme.

They should not:

- Threaten or expel any suspected or confirmed child labourer.
- Relocate a child without both the consent of their guardian and Pentland Brands.
- Produce or present any falsified documents.
- Compensate the child or family unless an agreed action within the remediation process.

Child Labour Remediation

Pentland Brands will seek to work in partnership with suppliers/partners and a local NGO expert in remedying cases of child labour.

In each case we will look to provide a responsible solution that is in the best long-term interests of the child.

Suppliers/partners should expect to provide the following support:

- Security and protection to the child until family repatriation by a local NGO can be facilitated.
- Assurance of re-employment opportunity on attaining legal working age.
- Continuation of wage payments to the child, family or legal guardian, at least adult legal minimum wage, on a monthly basis throughout the remediation process, and until minimum legal working age is reached.
- Costs relating to the child participating in appropriate vocational courses, training for work, apprenticeship, and any counselling deemed appropriate.

Contacts

We encourage feedback on any of the content in this document.

For any queries, feedback, disclosures or whistleblowing please contact corporate.responsibility@pentland.com