



## CHILD PROTECTION POLICY

### **Our Policy:**

Wilmar International does not tolerate child labour, any forms of child exploitation, and child abuse.

Wilmar is committed to ensuring the rights and protection of children under age 18 (as set in the UN Convention on the rights of the child), and also adopts the definition of Child Labour as contained within the ILO Worst Forms of Child Labour Convention No. 182, and the ILO Minimum Age Convention, 1973 (No. 138).

All Wilmar staff are responsible to ensure this policy is implemented at all times, including adherence by contractors and suppliers.

### **We are committed to:**

- Protecting the interests and wellbeing of children in all of our operations, activities and decisions, including management policies pertaining to working parents, and all areas under direct Wilmar management but may not be part of the workplace (i.e. workers housing, recreational facilities, etc);
- Ensuring that all employment directly carried out by Wilmar adheres to our No Child Labour Clause (see Annex 1)
- Respecting the rights and protecting the welfare and wellbeing of the children who live with their parents within Wilmar management areas, and children that use Wilmar managed services<sup>1</sup>;
- Taking all reasonable steps to protect children from all forms of exploitation and abuse;
- Providing all children of our staff and workers, the best possible opportunities to access primary and secondary education;
- Responding to all forms of child exploitation and child abuse swiftly and appropriately from when these are made known to us; and,
- Ensuring that only suitably qualified persons who have been trained in our Child Protection Policy will be employed in positions where they have direct contact with children as part of their work
- Working with our suppliers to ensure commitment and adherence to this policy

### 1.1 Our Policy and the UN Convention on the Rights of the Child

Wilmar's Child Protection Policy is based on the principles of the UN Convention on the Rights of the Child. It provides a comprehensive framework for the protection, provision for and participation of all children without discrimination to ensure their survival and development.

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<sup>1</sup> Services comprise of schools, childcare facilities, clinics and transportation.

## 1.2 Our Policy and National Laws

Operations, facilities, and sites (including plantations and their associated operations), must observe the laws of the country, province, region, state, and locality in which they are located. All development of specific procedures, guidance and training with regards to children and their care, shall be in line with both local laws and this Policy. At the same time, we recognize that Wilmar International seeks to be consistent in our application of standard operating procedures and requirements, which may at time exceed the requirement of national or local laws. This Policy shall therefore, be adhered to in addition to the relevant national and local laws on Child Protection.

## 1.3 Compliance

The policy will be reviewed whenever there is a major change in the organization or in relevant legislation. Compliance with procedures will be reviewed annually.

### **ANNEX 1 – NO CHILD LABOUR CLAUSE**

Wilmar International (“Wilmar”) is committed to the principles of protecting children from child labour. The Company believes that their future development and that of the communities and countries in which they live is best served through education and not child labour.

#### 1. Definition

- 1.1. Child labour, as defined by the International Labour Organisation (ILO) Convention 182 is “work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under the age of 18 that is hazardous to the physical or mental health of the child.
- 1.2. Wilmar recognizes 18 years old as the minimum age for full employment.
- 1.3. Noting the ILO Minimum Age Convention, 1973 (No. 138) defining 15 years old as the minimum age of work, where local regulations allow the employment of young persons (i.e. 15 – 17 years old), Wilmar will only allow this where the local minimum school age is below 15 years old, and where there is local regulation requiring specific consideration and controls for appropriate safeguards for young persons (i.e. limited hours, no work at night, no heavy and unsafe work, etc). Development of localized specific guidelines is required for this allocation. In any event, Wilmar will comply with the safeguards in ILO Convention 182 against worst forms of child labour.

#### 2. Management Commitment

- 2.1. The Company prohibits the use of child labour and forced or compulsory labour in its global operations.

#### 3. Implementation

- 3.1. In the conduct of its business, Wilmar:
  - Will comply with all relevant and applicable local and international labour regulations, treaties, conventions and principles relating to the protection, welfare and health & safety of children.
  - Will not employ children that fall into the definition as stipulated by ILO Convention, notwithstanding any national law or local regulation;

- Will ensure that this Policy is publicly available throughout the Company and clearly communicated to all employees, contractors, and suppliers in a manner which can be understood.
  - Will maintain employment records documenting all relevant details of its employees, including age, and make these records open to verification by any authorised personnel of relevant statutory body.
  - Shall take appropriate measures to prevent the use of child labour in connection with its activities.
  - Shall employ remedial actions consistent with our “Remedial Action Guidelines” (as contained in section 5) in the case that child labour is uncovered to ensure appropriate follow-up and assistance for protection of the child’s interests and welfare.
4. The Child Labour clause applies throughout Wilmar’s global operations, including our subsidiaries, joint-ventures, and third-party suppliers.
5. Remedial action guidelines:
- 5.1. If child labour is found within the global operations of Wilmar International, we will seek where appropriate, to work in partnership with appropriately qualified organisations to develop a responsible solution that is in the best long-term interest of the affected child/children. Wilmar International will develop a corrective action plan, which may comprise the following actions:
- Collate a list of all potential child labourers and young workers
  - Seek advice and help from recognised organisations that deal with child labour or the welfare of children
  - Develop a remediation plan that secures the children’s education and protects their physical and economic well-being, where possible in consultation with local government authorities, and in consultation with and respecting the views of the child
  - Explain the legal requirements and restrictions on working ages to the children and assure them that, if they wish, they will be employed when they reach working age, as stipulated in section 1.3 of this clause
  - Understand the children’s desires and explore the opportunities for them to re-enter education.
  - Work to find alternative long-term solutions that is agreed with the child and their family (for example employment of an unemployed adult family member in place of the child labourer).
  - Ensure that the child worker, if found to be alone and without parents or guardian, has adequate accommodation and living conditions.
  - Document all actions
  - Develop processes and corrective action plan to prevent recurrence
  - We will not
    - Expel any of the suspected or confirmed child labourers
    - Threaten the children or their families or hamper the progress of investigation and remediation
    - Conceal or falsify any information and documentation

- 5.2. If child labour is found in the operations of our suppliers, we will work with them to ensure the adequate implementation of these guidelines. Failure to comply will be raised to Wilmar's Suspension Committee



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