



Summit Timber Group Ltd : Child Labour Policy

1. Purpose

Summit Timber Group Ltd (“the Group”) is committed to ensuring that **child labour is not used** in any part of its operations or supply chain. This policy establishes our commitment to **preventing child labour** and sets out a clear **remediation plan** in accordance with International Labour Organization (ILO) standards, specifically:

- **ILO Convention No. 138** – Minimum Age
- **ILO Convention No. 182** – Worst Forms of Child Labour

The Group respects the **rights of the child**, as defined by the **UN Convention on the Rights of the Child**, and is dedicated to taking corrective action and supporting remediation if child labour is identified.

2. Scope

This policy applies to:

- All Summit Timber Group operations
- All subsidiaries, contractors, and suppliers
- All staff, regardless of employment type or location

3. Policy Statement

The Group has **zero tolerance for child labour**. We are committed to:

- Preventing employment of children below the legal minimum working age;
- Identifying and eliminating the worst forms of child labour;
- Protecting young workers (aged 15–17) from hazardous work;
- Ensuring immediate corrective action and supporting remediation where violations are found.

Definition of Child Labour:

- Any work that deprives children of their childhood, dignity, or potential;
- Work that is mentally, physically, socially, or morally dangerous;
- Work that interferes with schooling;
- Children: persons under 15, or below the age of completing compulsory education
- Young Workers: persons aged 15–17, requiring protections from hazardous work.

4. Implementation Measures

Hiring Practices:

- Verify age of all employees through official documentation (e.g., birth certificate, passport, ID);
- Maintain records of all workers’ ages;
- Communicate age verification and hiring policies clearly to recruitment agencies and contractors.

**Supplier Requirements:**

- Suppliers must comply with this policy and relevant ILO standards;
- Conduct regular audits via **SMETA or equivalent third-party auditing systems**;
- Require suppliers to demonstrate removal of child labour from their workforce and provide documentary evidence;
- Non-compliance may result in contract termination.

Training and Awareness:

- All employees receive training on child labour risks, detection, and reporting procedures.

5. Child Labour Remediation Plan**Direct Workforce:**

If a child is found to be employed within Summit Timber Group operations:

1. Remove the child from hazardous work immediately;
2. Provide support to the child and ensure they are not dismissed without assistance;
3. Assess the child's health, educational, and welfare needs, facilitating a return to school or vocational training;
4. Collaborate with local authorities or NGOs as necessary;
5. Investigate how the child came to be employed;
6. Strengthen prevention mechanisms and address systemic issues (e.g., poverty, recruitment gaps).

Suppliers:

If child labour is identified in a supplier's workforce:

1. Request immediate removal of the child from hazardous work;
2. Ensure the child is supported and not dismissed without local assistance;
3. Require the supplier to assess the child's needs and facilitate education or training;
4. Encourage collaboration with NGOs or local agencies;
5. Investigate the cause of the violation;
6. Require documented evidence through re-audits (SMETA or equivalent) confirming remediation;
7. Take contractual action if non-compliance persists.

Reporting Mechanism:

- Safe, confidential channels are available for raising concerns, including anonymous reporting.
 - Complaints can be directed to employee representatives or the [ir](#) Managing Director and will be investigated thoroughly.
-



6. Roles and Responsibilities

- **Board of Directors :** Ensure overall enforcement of the policy across the Group.
- **Managers:** Ensure overall enforcement of the policy within their Group Company and supply chain.
- **HR Teams:** Screen, monitor, and maintain age verification records.
- **Procurement Teams:** Request and review ongoing audits of suppliers to assess compliance.
- **QHSE / Compliance Teams:** Conduct internal audits and oversee remediation plans.
- **All Employees and Suppliers:** Report suspected cases of child labour immediately.

7. Enforcement and Accountability

- All suppliers will receive a copy of this policy and are required to acknowledge acceptance and compliance;
- Non-compliant suppliers will be given a clear action plan and support to improve;
- Contracts may be terminated if suppliers fail to meet required standards;
- The Group will monitor remediation and continue to raise awareness of best practices in ethical labour standards.

8. Review

This policy and the associated remediation framework will be reviewed **annually** or sooner in response to:

- Changes in national or international law;
 - Findings from supplier audits;
 - Feedback from stakeholders.
-

Approved by the Board of Directors of Summit Timber Group Ltd