

# Child Labour Addendum

Supplier requirements, prevention & remediation  
protocol

We create better experiences together for a better tomorrow

# Child Labour Addendum

## Objective and how to read this document

The objective of this Child Labour Addendum (Addendum) is to provide suppliers with clarity on Woolworths Group's expectations as they relate to respecting children's rights and preventing child labour in our supply chain. The requirements in this document do not replace the Responsible Sourcing Policy or Standards. Rather, they provide further detail on Woolworths' specific expectations relating to respecting children's rights and preventing child labour.

## Our Commitment

Every child has the right to a healthy and safe environment with access to education, play and recreation, an adequate standard of living, and protection from abuse and harm. Woolworths takes a Zero Tolerance approach to child labour in any area of its operations or supply chain and does not tolerate children being exposed to any risk in production sites used for our products or services.

This Child Labour Addendum outlines our approach, and aims to clarify our expectations of supplier partners for the prevention and remediation of any child labour cases should they be identified in Woolworths' supply chain. Woolworths will review and update this Addendum at regular intervals to ensure it remains fit for purpose.

Woolworths recognises that not all work done by children should be classified as child labour. This includes activities such as helping their parents around the home, assisting in a family business or earning pocket money outside of school hours and during school holidays. When the appropriate protections are put in place, these kinds of activities contribute to children's development and to the welfare of their families, providing skills and experience for adult life.

Child labour may be:

- Work that is mentally, physically, socially or morally dangerous and harmful.
- Work that fails to take into account compulsory schooling.
- Work that requires children to combine school attendance with excessively and/or long and heavy work.

The worst forms of child labour involve enslavement, separation of children from their families and exposure to hazardous conditions.

In the event of any failure to comply with the Addendum, Woolworths will require that the situation be remedied as quickly as possible.

## Our expectations | prevention of child labour

Every Woolworths supplier, and including their supply chains, must have systems, policies and processes in place to ensure that child labour does not occur at production sites used for Woolworths. This includes the prohibition of children performing work which is classified as child labour, anywhere within the production site premises or at any other site owned by the same supplier

partner, even if carried out on behalf of a third party rather than the production site. Suppliers should ensure that, at a minimum, production sites used for Woolworths have the following measures in place, aligned to clauses under Woolworths' Responsible Sourcing Standard No. 6 (Child Labour):

- 1) A robust hiring policy is maintained which explicitly states the minimum age for workers and fully respects juvenile workers' rights at work. This includes risks related to labour agents and subcontractors.
- 2) An effective age verification procedure is in place for recruitment which covers the recruitment of all workers: full-time, part-time or temporary, including those hired through labour agents and at subcontractor sites.
- 3) Robust systems exist to protect young or juvenile workers including adequate Occupational Health and Safety training, and systems to ensure no night work and working hours restrictions are respected.
- 4) Protocols are in place to ensure that children are not placed at any risk at production sites including regular training and communication of child labour standards both internally (management staff and workers) and externally (suppliers and sub-contractors).
- 5) Woolworths is informed proactively of any risks of child labour at any of its production sites.

It is also highly recommended that suppliers set up a specific child labour prevention and remediation policy and procedure that includes labour agents and subcontractors.

## Remediation of cases of child labour

### Who to contact

If any child labour or any risk to child rights is identified or suspected in any part of the supply chain, suppliers should immediately contact the Woolworths Responsible Sourcing team via the contact below (end of document), providing a report of the situation. The report should include site details, no. of workers involved, supplier and site contact details and any other relevant information. Woolworths will contact the supplier as soon as possible to agree on the next steps.

### Roles and responsibilities

If child labour is identified as being used directly or indirectly by any supplier producing for Woolworths, we will aim to partner with our supplier and with local expert organisations to reach a solution and agree on any necessary remediation measures which is in the best interests of the child, and their family.

We partner with the 'Center for Child Rights and Business (CRIB)', an organisation specialising in children's rights in global supply chains. Where child labour remediation is required, we may transfer the case to a joint remediation program lead by CRIB or other partner organisation.

In all cases, the supplier is expected to take proactive steps for remediation, bearing full responsibility and costs while a sensitive and satisfactory solution is found. Remediation progress must be regularly monitored and will be verified by Woolworths (see section 3).

The following principles should be followed:

- Where applicable, suppliers must collaborate fully with the relevant local organisation, facilitating as required
- The child with their family is consulted to understand their wishes and needs
- A process and next steps are agreed with the child
- Employers compensate for the loss of income
- Employers must enable the child to attend school and pay associated fees with education costs
- Employers can offer employment to a qualified adult member of the child's family (if possible) or to the child once they reach minimum legal working age

- An investigation is conducted with appropriate child labour and protection agencies
- A monitoring mechanism is established and regular reviews of the child's progress are conducted

### 1. If the child is below the minimum working age

In order to ensure the well-being of the child in such cases, Woolworths requires compliance with the following minimum requirements:

- The child must cease work immediately.
- The employer must provide the child with appropriate compensation for the loss of employment.
- The employer must safeguard and promote the welfare of the child, which will include, for example, verification of continuation of compulsory schooling and financial assistance for the family of the respective child.

### 2. If juvenile workers are found performing hazardous work

2.1 Ensure that the worker is provided with an age-appropriate position.

2.2 Carry out a medical examination of the child with consent from the child and their guardian, without any cost implication to the child. The examination should establish whether the child has experienced any negative impact through the work carried out.

2.3 If the medical examination finds that any negative health impacts have occurred as a result of the work performed, devise and implement a treatment plan in consultation with the child and their parent or guardian.

### 3. Verification and commitment to long-term remediation

3.1 The supplier must provide Woolworths with a child labour remediation plan within 30 days of child labour being identified.

3.2 The production site will be subject to verification audits within 3 months and after 6-12 months from the incident being identified, to monitor progress.

3.3 Suppliers and production sites must also develop and implement a plan to prevent any future cases of child labour. This should include mandatory training on child rights and Woolworths child labour policy.

We are committed to working with our suppliers to find workable solutions and uplift capacity where required. However, if a supplier fails to show commitment to full remediation Woolworths reserves the right to review the suitability of the business relationship and may explore options to cease or suspend it.

## Terms & Definitions

**Minimum working age:** Where national legislation lacks child labour protections, Woolworths adopts the standards set by the International Labour Organization's ('ILO') Minimum Age Convention, (No.138).

**Young or Juvenile worker:** A juvenile worker is defined as a worker who has reached the minimum working age but is not yet 18 years old. Where national laws do not restrict young workers from working overtime, suppliers employing young workers should respect ILO conventions, applying the following guidelines:

- No hazardous work
- No night work

- No overtime
- At least 12 consecutive hours of night rest each day

**Child labour:** 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:** Light work is defined by ILO Convention No. 138 in Article 7 as work that should, (a) not be harmful to a child’s health and development and, (b) not prejudice attendance at school and participation in vocational training or “the capacity to benefit from the instruction received”. The work is only permitted if it happens outside of school hours and aligns to ILO conventions.

**Hazardous work:** According to the ILO, ‘hazardous work’ is defined as any kind of work that might be harmful 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. Suppliers should refer to national hazardous worklists for reference, particularly when defining tasks for juvenile workers

## Additional guidance

This Policy is drafted in accordance with:

- [The United Nations Convention on the Rights of the Child \(UNCRC\)](#).
- [Children’s Rights and Business Principles](#) (UNICEF, the UN Global Compact and Save the Children)

It is informed by the following guidelines and conventions:

- International Labour Organization (ILO) [Conventions No.138](#) (Minimum Age) and [No.182](#) (Worst Forms of Child Labour).
- [ILO Supplier Guidance on Preventing, Identifying and Addressing Child Labour](#).

Woolworths is committed to finding sustainable solutions for tackling child labour in partnership with our suppliers. We will continue to engage in multi-stakeholder initiatives to take an industry wide approach to shared risks in our supply chains, and continue to include child rights in our human rights risk and impact assessments in order to inform our approach and support child rights.

<b>Version:</b>	Version 1, July 2022 (rebranded December 2023)
<b>Contact and feedback:</b>	Responsible Sourcing team via: Email: <a href="mailto:responsiblesourcing@woolworths.com.au">responsiblesourcing@woolworths.com.au</a>
<b>Related documents:</b>	<ul style="list-style-type: none"> <li>• Woolworths Responsible Sourcing Policy &amp; Standards</li> <li>• Woolworths Sustainable Soy Sourcing Policy</li> <li>• Woolworths Sustainable Tea, Coffee, Cocoa &amp; Cane Sugar Sourcing Policy</li> <li>• Woolworths Group Seafood Sourcing Policy</li> </ul>