

## CHILD FORCED LABOR POLICY

Forced labor can take many forms, including human trafficking, slavery, and child labor. As a global employer RA has an important role to play in these issues. To this end, RA has adopted the following Principles to reinforce its core value of treating all people with dignity and respect. This policy will compliment any submissions to the United Nations Global Compact (UNG) and regulations indicated by the International Labor Organization (ILO).

### 1. Principles

- 1.1 RA will not tolerate the use of child or forced labor, slavery or human trafficking in any of its global operations and facilities.
- 1.2 We will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, or the trafficking, physical punishment, abuse, or involuntary servitude of any worker.
- 1.3 We expect our suppliers and contractors with whom we do business to uphold the same standards. Should a pattern of violation of these principles become known to RA and not be corrected, we shall discontinue the business relationship.
- 1.4 For purposes of these principles, a "child" is anyone who is less than 15 years of age.
- 1.5 We support temporary workplace internships and apprenticeship education programs for younger persons as well as customary seasonal employment, so long as such persons are closely supervised and their morals, safety, health, and compulsory education are not compromised in any way.

It is the responsibility of local management to implement and ensure compliance with these principles at RA facilities in each region around the world. RA's Head of HR and the Head of Supply Chain both have the responsibility for ensuring the implementation and compliance with the principles on a global basis by RA suppliers and contractors. The following guidelines are provided to help in carrying out these responsibilities:

### 2. RA Guidelines on Child Labor

- 2.1 For purposes of these principles, RA defines a "child" as anyone who is less than 15 years of age.
- 2.2 Notwithstanding any national law or local regulation that permits a worker to be less than 15 years of age, for purposes of these principles, RA defines such a person as a "child".
- 2.3 At sites and in locations where a national or local law or regulation provides for a minimum employment age greater than 15 years or imposes additional restrictions in activities such as hazardous work, such laws and regulations must be observed.
- 2.4 RA global operations and facilities includes all RA operations, its worldwide subsidiaries and joint ventures.
- 2.5 In the case of hazardous work, any person under the age of 18, must not be employed.
- 2.6 In determining work that is unsuitably dangerous for persons under the age of 18,

consideration should be given to:

- 2.6.1 Work which exposes them to the possibility of physical, psychological or sexual abuse.
- 2.6.2 Working underground, under water, at dangerous heights or in confined spaces.
- 2.6.3 Working with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads.
- 2.6.4 Working in an unhealthy environment which may, for example, expose them to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health.
- 2.6.5 Working under particularly difficult conditions such as work for long hours or during the night or work where they are unreasonably confined to the premises of the employer.

### 3. RA Guidelines on Forced Labor

- 3.1 Forced labor is any and all work or service which is exacted from any person under the menace of any penalty for its non-performance and for which the worker does not offer him or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that that labor is not forced or compulsory.
- 3.2 RA, together with its worldwide subsidiaries, affiliates, joint ventures or other associated entities, will not use Forced Labor in any of its operations anywhere in the world. This commitment also extends to the use of any factory or sub-vendors who make or assemble RA products.
- 3.3 RA, will not purchase, rent, lease, borrow or otherwise use any products, goods, services, or raw materials anywhere in the world, made or provided by a supplier who knowingly uses forced or involuntary prison labor.

### 4. Guidelines for Vendors, Contractors and Suppliers

- 4.1 RA, together with its worldwide subsidiaries and joint ventures, requires that all of its global vendors, contractors, and suppliers of any product or raw material, wherever its origins, apply its Child Labor and Forced Labor principles.
- 4.2 All current and future goods, services, supply contracts will be modified to contain the following clause:

### 5. Child Labor and Forced Labor Prohibition

- 5.1 “[Contractor] hereby certifies that it is fully aware of the prohibition regarding the employment of children under fifteen (15) years of age pursuant to the RA International Child Labor Principles and on the prohibition on use of involuntary labor, human trafficked or slave labor, pursuant to the RA International Forced Labor Principles (hereinafter referred to collectively as “RA International Principles”).
- 5.2 [Contractor] certifies that it does not currently employ, and will not in the future employ, directly or indirectly, or through any subcontractor, any child to perform work for RA who is under fifteen (15) years of age, or eighteen (18) years of age in the case of hazardous

work, in any of its operations or activities in a manner contravening RA International Principles, or in violation of relevant laws and regulations. [Contractor] certifies that it, and its suppliers of goods and services, will not utilize persons under the age of fifteen (15), or eighteen (18) years of age for hazardous work, in contravention of the RA International Principles or in violation of relevant laws and regulations.

- 5.3 [Contractor] certifies that the workers it uses, and will use, to produce and supply the goods and services offered are in all cases present voluntarily. [Contractor] certifies that it and its suppliers of goods and services, will not knowingly utilize prison, slave, human trafficked or forced labor as it is defined in the RA International Principles.
- 5.4 [Contractor] understands that these certifications and undertakings are essential to this contract. [Contractor] agrees to indemnify RA and hold RA harmless with respect to any violation of relevant laws and regulations, or for any civil liability arising from the contravention of the RA International Principles by [Contractor], or any of its suppliers of goods or services. [Contractor] also agrees that, in the event that RA determines that a violation, or contravention of relevant laws or regulations or the RA International Principles has occurred, RA shall notify [Contractor] and [Contractor] shall immediately remedy the violation or contravention. In the event that RA determines that [Contractor] has not remedied the violation or contravention and complied with the law and/or the RA International Principles, then RA may terminate this contract immediately.

## 6. Legal

These policies and procedures shall conform to the provisions of the relevant ILO standards and specifically as follows:

ILO Conventions

C138: Minimum Age for Employment, 1973

C105: Worst Forms of Child Labour, 1999

Other international guidelines:

Preventing the engagement of children in or removing them from the worst forms of child labour, protecting them from reprisals and providing for their rehabilitation and social integration through measures which address their educational, physical and psychological needs. (ILO R190 - 1999)

Full-time attendance at school or participation in approved vocational orientation or training programmes, should be required and effectively ensured up to an age at least equal to that specified for admission to employment (ILO R146 – 1973)

## 7. Human Resources

RA will maintain all records and documentation associated with ensuring that both best practice and principles are enforced to include but not restricted to:

- 7.1 Implementing policy on child labour
- 7.2 Zero employment of workers below the age of 15
- 7.3 Verifying the age of job applicants

- 7.4 Amendment to recruitment policy for young workers
- 7.5 Maintaining records of employee ages to show they are of legal age for their jobs

## 8. Summary

Child labour can limit or damage the physical, mental, social or psychological development of children and undermine a child's right to childhood, development and education. RA recognises its responsibility to take an effective role in reducing child labour.

RA is firmly committed to creating strong business growth, which is not achieved at the expense of the environment, quality of life, or social equity. The aim of this policy is to ensure that RA takes appropriate steps, with regards child labour issues, enriching the communities in which we operate, thus contributing to the wellbeing of our stakeholders, enhancing the organisation's relations and protecting reputation. This policy encourages the development and implementation of responsible business practice.

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CEO

Policy Implementation/ Review Date	Next Policy Review Date
January-2026	January-2027