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**CHILD LABOUR
POLICY STATEMENT**

Statement on the Company's Child Labour Policy

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Introduction

The Wünsche Group, a globally recognized service and trade organization, is dedicated to upholding and protecting the rights of children throughout its operations and supply chains. We understand that every child has the inherent right to a secure and healthy environment, access to education, recreation, a decent standard of living, and protection from any form of harm or exploitation. As a business dealing primarily in the development and acquisition of store-brand goods, promotional goods, and various product lines, we do not condone any form of child labour or the exposure of children to any risks associated with the production of our goods and services. The Wünsche Child Labour Policy is firmly grounded in the principles of the United Nations Convention on the Rights of the Child (UNCRC), the International Labour Organization (ILO) Conventions No 138 (Minimum Age) and No 182 (Worst Forms of Child Labour), and the Children's Rights and Business Principles. This child labour policy outlines our obligations and measures geared towards the prevention and elimination of child labour. It defines a mandatory framework for our own operations and our business partners and forms an integral part of the Wünsche Group's comprehensive corporate responsibility strategy.

The scope of this policy covers all products under the Wünsche Group and its trading companies, ensuring we uphold the highest standards of corporate responsibility and human rights across our entire operation.

This policy will be revised and updated at regular intervals to ensure we are consistently aligned with the evolving landscape of laws and regulations.

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Terms and Definition

Understanding the correct definitions of the terms related to child labour is essential in establishing an effective child labour policy. The terms are defined as per the International Labour Organization (ILO) conventions and other globally recognized standards.

A **child** is defined by the United Nations Convention on the Rights of the Child (UNCRC) as a person who is under the age of 18 years, unless under the law applicable to the child, majority is attained earlier.

Minimum working age refers to the lowest age legally permissible for employment or work. According to the ILO Convention No 138, the minimum age should not be less than the age of completion of compulsory schooling, typically around 15 years of age.

A **juvenile worker** is a worker who has attained the minimum working age but is still under 18 (as defined by the ILO). These individuals, while legally allowed to work, are provided certain protections under the law to ensure their working conditions do not interfere with their health, safety, moral well-being, or their education.

Child labour, as defined by the ILO, is work that 'deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.' It encompasses:

- Engagement in work by any child who falls below the minimum working age, and
- Involvement in hazardous work by juvenile workers.

Hazardous work is defined by the ILO as work which, by its nature or the circumstances in which it is carried out, is likely to harm the current and future health, safety or morals of children. This could include work that exposes children to physical, psychological, or sexual abuse; work underground, underwater, at dangerous heights or in confined spaces;

Minimum working age (selected countries):

14 Bangladesh, Egypt, India,
Myanmar, Pakistan

15 Cambodia, Thailand,
Turkey

16 China



exposure to extreme temperatures and noise; work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; night shifts and overtime.

It is imperative to understand and apply these definitions accurately to ensure the appropriate implementation of the child labour policy and to protect children effectively.

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Business Partner Compliance and Prevention of Child Labour

At the Wünsche Group, we expect all our business partners to ensure that child labour does not occur within their operations and supply chains. This expectation covers all work activities on the production sites and production facility premises, including those conducted by third-party contractors like cleaning service providers, construction workers, or caterers.

Definition of Production Site

Production sites are defined as any site which is used for the production or the growth of any product sold to Wünsche Group.



Potential Child Labour Situations and Preventive Measures

We view any presence of children in production areas as a potential risk of child labour. For this reason, it's required from our business partners to ensure a clear demarcation between production and non-production areas, such as childcare facilities.

To effectively prevent and remediate child labour, our business partners must meet several expectations:

Policies and Procedures

We expect all business partners to adhere to local and international laws and regulations, to respect the minimum working age and to have robust age verification mechanisms. We also expect the development of policies around the appropriate positioning of juvenile workers, the management of apprenticeships and traineeships, and procedures for identifying and remediating cases of child labour.

Communication and Training

All business partners are required to ensure their policies are signed by senior managers, communicated to all employees, and are a central focus during regular training sessions. We also expect that these policies will be communicated to all contractors to ensure a universal application of the ban on child labour.

Document Management

Keeping accurate records is crucial. Business partners must maintain copies of the production facilities child labour policy signed by senior management, verified proof-of-age documents in the workers' personnel file, complete records of past child labour cases, training and communication records and other documents related to the employment of juvenile workers.

Monitoring

We expect regular checks to be conducted by business partners to ensure policies and control mechanisms are being upheld. Confidential reporting mechanisms for suspected cases of child labour should be in place, and internal assessments, including age verification spot-checks, should be carried out periodically.

Employment Policies and Treatment of Juvenile Workers

Employment policies of our business partners must respect the minimum age for workers and honour the rights of juvenile workers. Age verification mechanisms must be an integral part of the recruitment process. Under no circumstances should medical examinations be used as an age verification mechanism, but only to assess any work-related negative impact, always with the consent of the child and their parents or guardians.

We advocate for the rights of juvenile workers to work in a safe, non-discriminatory, and non-exploitative environment. Production facilities must not exclude eligible juvenile workers based on their age alone and must ensure these young workers have a safe working environment, are not tasked with hazardous work and have sufficient rest periods.

Apprenticeships and Traineeships

Management of apprenticeships and traineeships must always adhere to national laws. We require our business partners to ensure that juvenile workers enrolled in these programs are not overworked by taking into account their work hours, school time, and commute times.



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Corrective Measures When Child Labour is Identified

In the event that child labour is suspected and identified within the Wünsche Group's operations or supply chains, we are committed to taking immediate and decisive corrective actions. If our business partners identify child labour anywhere in the supply chain, the Wünsche Group encourages them to seek out our support in addressing and remediating the case.

Immediate Removal and Protection

The child will be removed from the working environment immediately, ensuring their safety and well-being as our utmost priority.

Reporting and Documentation

The incident will be reported to labour organizations and other relevant agencies as appropriate. Detailed documentation will be kept of all actions taken.

Family and Community Engagement

We will work closely with the child's family and community as appropriate to understand the circumstances that led to the child labour situation.

Education Support

The Wünsche Group is committed to ensuring that every child has access to education. Therefore, we will support the child to return to school or to access appropriate vocational training.

Monitoring and Follow-Up

The situation will be monitored closely after the corrective measures have been implemented and we will conduct regular follow-ups to ensure that the child is not re-engaged in labour until they reach the legal working age.

Supply Chain Engagement

If child labour is identified within our supply chain, we will work with the supplier to understand the root cause and to take remedial and preventive action. If the supplier fails to address the issue effectively and promptly, we will end the business relationship with them.

Preventive Measures

We will review the incident to understand how our policies and procedures could be strengthened to prevent similar occurrences in the future. This will involve regularly reviewing and updating our child labour policy and ensuring effective training and awareness programs are in place for our staff and partners.

The Wünsche Group is firmly committed to combatting child labour. When child labour cases are identified, we consider it not just a violation of our policy, but a call to action. We believe that every child deserves a safe, healthy childhood and we are committed to doing our part to make that a reality.

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Björn Peters



Thomas Wünsche