

CHILD LABOR POLICY

Purpose: The purpose of this policy is to establish Rich's commitment to upholding the law and protecting the interests of children

Scope: This policy applies to our Rich Products Corporation, its subsidiaries and affiliates and those we do business with, including suppliers, vendors and contractors

Definitions:

Child – a person under the age of 18, unless the laws of a particular country set the legal age for adulthood younger

Child Labor - the engagement of children in prohibited work

The International Labour Organization (the "ILO") – An agency established in 1919 that brings together governments, employers and workers of 187 Member States to set labour standards, develop policies and devise programs promoting decent work for all peoples

- *ILO Minimum Age Convention, 1973 (C138)* – sets general minimum age for employment or work at 15 years and minimum age for hazardous work at 18 years.
- *ILO Worst Forms of Child Labour Convention, 1999 (C182)* – prohibits the worst forms of child labour

Policy Statement: Rich Products Corporation shall follow the ILO Conventions C138 and C182 in all decisions relating to children in the workplace.

Because of the inherent danger in working around the industrial equipment in our supply chain, no child under the age of 18 shall be employed to work in production, maintenance, security, warehousing or any other potentially dangerous activity, or as prohibited by national law.

Children between 16 and 18 years of age can be considered for appropriate clerical positions or internships if they meet all of the requirements for the position and where this is permitted by national law.

Where national law permits workers under the age of 18 to work this may be permitted as long as all work follows national legal requirements and at minimum aligns with ILO C138 and C182.

Rich's requires all suppliers and subcontractors to adhere to this policy on Child Labor. Any supplier or contractor who does not adhere to this policy after notice of violation and an appropriate amount of time, no longer than 30 days, shall be disqualified as a

supplier or subcontractor of Rich's.

Responsibilities: Rich's will:

- Prohibit the use of child labor in all its locations
- Adopt strict compliance with all relevant local and international laws and standards in respect to child labor
- Not employ any person below the age of eighteen years at the workplace except as set forth above
- Train supervisors and managers on child labor requirements
- Require suppliers, vendors and contractors to follow the stricter applicable laws and recognize children's rights. They must also require their own suppliers, subcontractors and stakeholders to do the same

Review and Monitoring: This policy is implemented by Human Resources, Procurement, and site leadership. The Chief Human Resources Officer and the Vice President of Compliance have responsibility for overseeing company-wide compliance with this policy.

In the event that employment of a child is discovered anywhere in Rich's supply chain, Rich's will take immediate step to act in the best interests of the child. Local management will contact Rich's Vice President of Compliance who will work with local management to resolve all issues consistent with the ILO Conventions. Any unlawful labor will cease immediately. The parents of the child and the local social services agency charged with the protection of children shall be contacted and any parties with whom Rich's is contractually obligated will also be notified. Rich's reserves the right to involve other experts and stakeholders as needed. The goal of such activity shall be to identify the appropriate people to determine and resolve the needs of the particular child

