

WILLIAM TURNER

Child Labour Policy

June 2025

Policy Commitment

At William Turner Ltd, we uphold the fundamental rights of children and are committed to ensuring that child labour is neither used nor supported in any part of our business operations or supply chain. We recognise the complexity of the issue and work collaboratively and proactively to promote long-term, sustainable solutions that protect children's wellbeing and development.

This policy applies to all our employees, suppliers, subcontractors, and business partners, regardless of location.

1. Our Principles

William Turner Ltd does not tolerate child labour under any circumstances.

We are guided by and fully support the following international frameworks:

- UN Convention on the Rights of the Child (1989)
- ILO Minimum Age Convention No. 138 (1973)
- ILO Convention on the Worst Forms of Child Labour No. 182 (1999)

Definitions:

- A child is defined as any person under the age of 15, or the age for completing compulsory schooling, or the minimum age of employment in the country, whichever is higher.
- In developing countries where permitted by law, the minimum working age may be set at 14.
- A young worker is someone aged 15 to 17 who is legally employed but must be protected from hazardous or exploitative work.

2. Supplier Expectations

All suppliers and subcontractors must:

- Prohibit child labour in any stage of production or service delivery.
- Comply with all applicable national and international laws on child and young worker employment.
- Take proactive measures to prevent child labour, including age verification and responsible recruitment practices.

3. Prevention and Due Diligence

Suppliers are expected to:

- Maintain a labour force register with verified documentation of each worker's date of birth.
- Where documentation is unavailable, implement alternative, locally appropriate, and lawful age assessment methods.
- Disclose all production facilities (including subcontractors) to William Turner Ltd and maintain up-to-date records.

William Turner Ltd reserves the right to conduct announced and unannounced inspections, directly or via independent third parties, to ensure compliance.

4. Young Workers

William Turner Ltd permits the lawful employment of young workers aged 15–17 only if:

- The work is non-hazardous and appropriate for their age and capacity.
- Legal limits on working hours and night work are strictly observed.
- Adequate supervision, training, and protections are in place.

5. Remediation Approach

If child labour is identified:

- William Turner Ltd will work with the supplier and, where possible, a qualified NGO or child welfare organisation to develop a Remediation Plan in the best interest of the child.

Actions may include:

- Withdrawing the child from work immediately and safely.
- Ensuring continued access to education, support services, and family assistance.
- Preventing displacement to other workplaces or sectors where the risk of exploitation remains.
- Addressing root causes to ensure the situation is not repeated.

Failure to implement corrective actions within an agreed timeframe or repeated violations may result in the termination of the business relationship.

6. Communication and Monitoring

- Suppliers must communicate this policy clearly to their workers and subcontractors and ensure full understanding and implementation.
- Any changes in the supply chain must be reported to William Turner Ltd without delay.
- Continuous monitoring and periodic reviews of supplier practices will be conducted as part of our ethical sourcing program.

7. Shared Responsibility

William Turner Ltd acknowledges that eliminating child labour requires joint efforts. We are committed to working with industry peers, civil society, and local communities to:

- Promote ethical practices in sourcing regions.
- Strengthen child protection systems.
- Support access to quality education and vocational training.

Signed:
Position: Managing Director
Print Name: Bruce Freeland
Date of Issue:

William Turner & Son Ltd

Building 6, Swift Court, Scott Drive,
Altrincham, Cheshire, WA15 8AB

Registered Company: No. 01819061

Tel: 0161 480 8582

Email: sales@william-turner.co.uk

Part of The Banner Group

banner®

