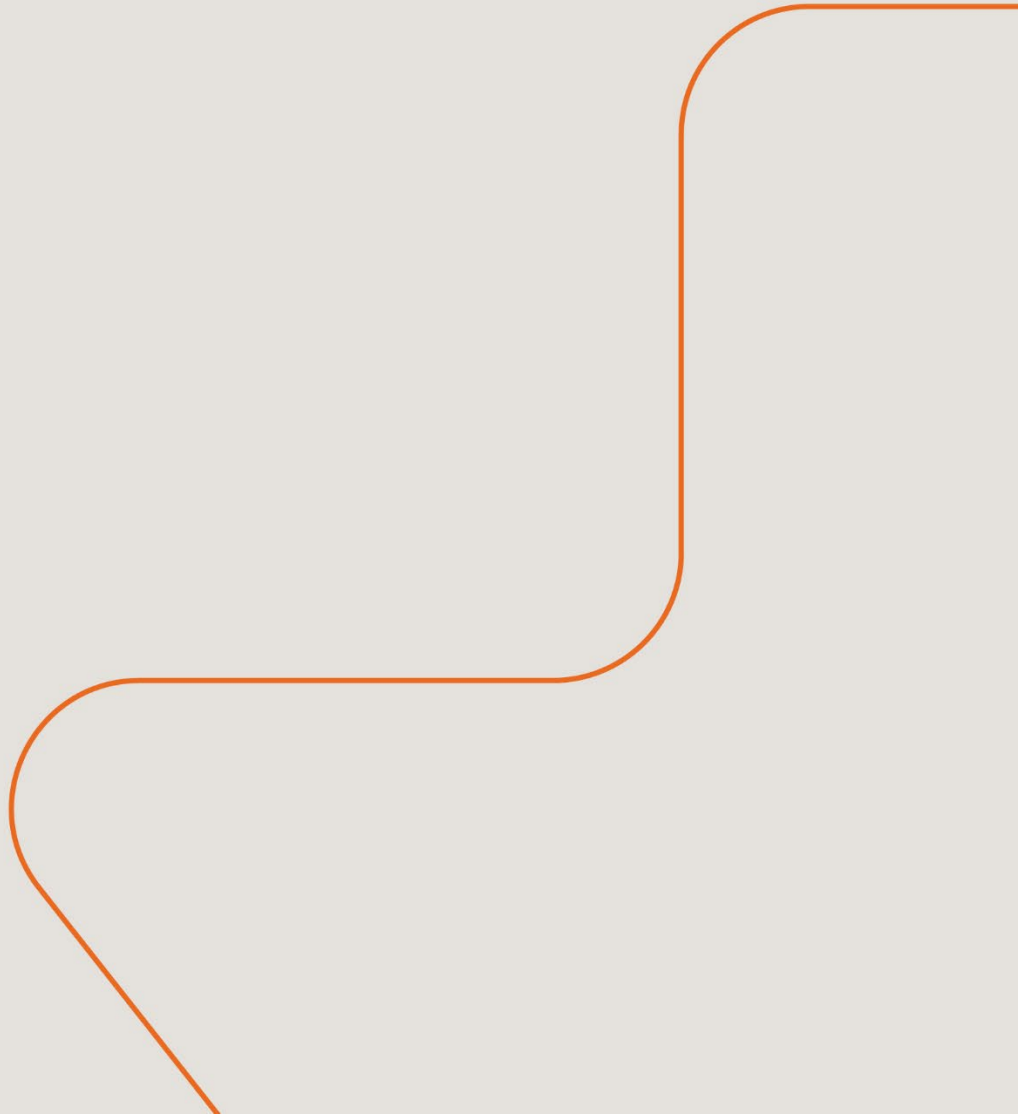




Almarys 

**POLICY ON THE PREVENTION
OF CHILD LABOUR AND
FORCED LABOUR**

Almarys Limited



Document Summary

Document Name	Policy on the Prevention of Child Labour and Forced Labour
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15/05/2023	Head of Governance and Legal Affairs	1.0	Creation
07/04/2026	Chief Legal and Governance Executive	1.1	Rebranding and change of name

COMMITMENT

Almarys Limited recognizes that, as a humane and caring employer, it has a moral and legal duty to ensure that its business is conducted sustainably, ethically and with respect to human rights.

We are fully engaged in providing a working environment in which people are treated with dignity and respect and which prevents and discourages all forms of Child Labour and Forced Labour.

In line with Almarys Group's Code of Ethics and with its strategic intent to drive for positive impact on society, the natural environment and the economy, we at Almarys Group:

- do not employ Children under the age of 16;
- do not employ Young persons on work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety, physical, mental, moral or social development of the Young person or which according to the Permanent Secretary is unsuitable for the young person or will interfere with the young person's education;
- do not force any person to do any work against his own free will;
- use our best endeavours not to indirectly support any form of Child Labour and/or Forced Labour;
- comply with all applicable national laws and regulations on Child Labour and Forced Labour.

In so doing, Almarys Group requires the highest standards of conduct from its employees as well as from Third Party/ies.

APPLICABILITY

This Policy applies to Almarys Limited and its Associated Companies that have adopted Almarys Group's compliance framework. This Policy purports to be without prejudice to any right which an employee has by law.

DEFINITION(S) AND INTERPRETATION

In this document:

1. any reference to one gender shall include the other gender;
2. 'we' or 'our' refers to Almarys Group and/or any Company; and
3. 'in the course of the employee's work' shall include all activities inside or outside the normal working days and hours, in which the employee is involved as a result of his work or training.

"Aggrieved Party" refers to any party whose personal, property, or financial interests or rights are negatively impacted by another's action in contradiction with the present Policy.

“**Almarys Group**” means any of Almarys Limited or its Associated Companies.

“**Associated Company**” means any company related to, or associate of, Almarys Limited that have adopted Almarys Group’s compliance framework and “related” shall be construed in accordance with the Companies Act 2001 while “associate” shall mean those companies disclosed as associates in the audited financial statements of Almarys Limited.

“**Company**” means Almarys Limited or an Associated Company to which this Policy applies.

“**Child(ren)**” means a person under the age of 16;

“**Child Labour**” means the employment of a Child in any industry or business and the employment of any Young person on work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety, physical, mental, moral or social development of the Young person; or on work which has been notified in writing by the Permanent Secretary as being unsuitable for the Young person, or as interfering with the Young person's education.

“**Employee**” means a worker within Almarys Group and includes all categories of employees and workers employed on an indeterminate or determinate duration, including full-time, part-time, casual workers and trainees under an apprenticeship, traineeship/training scheme.

“**Forced Labour**” means all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

“**Perpetrator**” refers to any person, including an employee and a Third Party supporting Child Labour and/or Forced Labour in any manner whatsoever.

“**Third Party/ies**” refers to all contractors, sub-contractors, consultants, vendors, agents, representatives and other service providers performing/ providing work, supplies or services for or on behalf of Almarys Group, joint venture partners, clients, banking and financial institutions/ lenders or otherwise.

“**Young person**” means a person, other than a child, who is under the age of 18.

SCOPE AND RESPONSIBILITIES

Sections 8 and 9 of the Workers’ Rights Act 2019 (as amended) provide, respectively, that:

- (i) no person shall employ a Child in any occupation and
- (ii) no person shall employ a Young person on work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety, physical, mental, moral or social development of the Young person; or on work which has been notified in writing by the Permanent Secretary as being unsuitable for the Young person, or as interfering with the Young person's education.

Section 6 of the Constitution of Mauritius provides inter alia, that *"no person shall be held in slavery or servitude and no person shall be required to perform forced labour"*.

In this context, this Policy shows Almarys Group's commitment to prevent all types of Child Labour and Forced Labour and sets out the procedure for dealing with complaints and/or report any form of Child Labour and Forced Labour in accordance with the applicable legal provisions.

All allegations of Child Labour and Forced Labour will be promptly, fairly and fully investigated, and will be dealt with in accordance with the provisions of the law and of this Policy.

It is the responsibility of Almarys Group, its employees and, in particular, managers and supervisors as well as human resources representatives to ensure that any known incident of Child Labour and/or Forced Labour, is promptly dealt with and corrective action taken.

Managers and supervisors as well as human resources representatives have the added responsibility to:

- (a) lead by example;
- (b) clearly explain to and remind all employees and Third Parties, of their responsibility under this Policy;
- (c) create and perpetuate a positive working environment/culture in which any form of Child Labour and Forced Labour does not occur; and
- (d) ensure a prompt adherence to this Policy.

PROCEDURE FOR DEALING WITH CHILD LABOUR AND FORCED LABOUR

First and foremost, any Employee or Aggrieved Party confronted to Child Labour and/or Forced Labour should, in a situation where the Employee or the Aggrieved Party feels that it is possible to do so, make it clear to any Perpetrator that his behaviour/action is immoral and/or unlawful. The Employee or Aggrieved Party can also, and according to the law, promptly report on any case of alleged Child Labour and/or Forced Labour through the below mentioned processes. In accordance with Almarys Group's Code of Ethics, the Employee or Aggrieved Party may consult the ethics officer prior to deciding on a course of action.

STEP 1: Reporting the matter

In line with Almarys Group's commitment to prevent all types of Child Labour and Forced Labour and in accordance with this Policy, Employees are encouraged and should come forward and report any case of alleged Child Labour and/or Forced Labour witnessed and/or noticed by them at work.

When an Employee in the course of his work witnesses and/or notice any form of Child Labour and/or Forced Labour by any Perpetrator, he shall promptly report the case, including in writing, to his supervisor/line manager and/or to the human resources representative.

Where an Employee reports a case of Child Labour and/or Forced Labour to his supervisor/line Manager only, the latter should promptly seek the guidance of the human resources representative for handling the matter.

Speak Up – the Group’s whistleblowing platform

To ensure the effectiveness of Almarys Group’s Code of Ethics, the codes of conduct, and core values, and encourage accountability at all levels, Almarys Group centralises the management of whistleblowing alerts and malpractice reporting into a single, accessible reporting channel, for employees and third parties.

The Group’s online reporting channel, Speak Up, is available to all stakeholders and can be accessed through-

- a link on the Group Companies’ websites, as well as on MyExperience
- QR codes displayed in emails, on websites and in various locations within Group Companies.

<https://er.whispli.com/speakup>



Speak Up allows anonymous alerts which will be processed as far as practicable. However, employees are encouraged to identify themselves when making an alert as admissibility of the alert may be impacted or an investigation may be limited without the source of information.

Speak Up allows for ongoing communication with the whistleblower including, if deemed necessary, the request for additional information from the whistleblower.

Please consult the Speak Up Policy for more details.

STEP 2: Enquiry

An enquiry shall be promptly conducted by the employer after the case is reported to the employer or the employer becomes aware of the case.

1. The Employee reporting the case of alleged Child Labour and/or Forced Labour at work should provide sufficient information and describe:
 - 1.1. the specific circumstances in which he witnessed and/or noticed Child Labour and/or Forced Labour.
 - 1.2. the location/s;
 - 1.3. the identity of the Perpetrator/s;

- 1.4. whether and in which circumstances the employee made it clear to the Perpetrator/s that his behaviour/act/practices were immoral and/or unlawful;
 - 1.5. any person who can support and/or otherwise provide further details on the Perpetrator and his practices; and
 - 1.6. anyone else to whom the Child Labour and/or Forced Labour has been related.
2. Witness/(es,) if any, will be called to provide information in relation to what they witnessed.
 3. As far as possible, Perpetrator/s will be called to provide his/their version of the case of alleged Child Labour and/or Forced Labour.

Statements and information gathered during the enquiry are internal and will be kept confidential unless processing such as disclosure is required or is permissible under law.

STEP 3: Take appropriate action

Following the enquiry, the employer shall take appropriate action with regard to the outcome of the enquiry undertaken.

1. On the basis of the enquiry, the employer will review the matter and decide whether:
 - 1.1. the matter be closed;
 - 1.2. to initiate disciplinary proceedings or any other action in accordance with law; or
 - 1.3. to advise the employee having reported the case of Child Labour and/or Forced Labour at work as to any other course of action.
2. The employer shall at its discretion with a view to protecting the rights of the employee and comply with all the applicable laws, where the matter is not closed, take appropriate action.

Such action may include but is not limited to:

- 2.1. disciplinary actions;
 - 2.2. counselling sessions and/or medical consultations;
 - 2.3. leaves being taken;
 - 2.4. the case of alleged Child Labour and/or Forced Labour at work being reported to the Police and/or the Ministry of Labour Human Resource Development and Training;
 - 2.5. legal proceedings; or
 - 2.6. any other action deemed appropriate by the employer.
3. The parties shall be informed of the decision/s taken.

4. Should the whole issue end up in a court of law or before any competent tribunal, then the Employee who made the complaint must make himself available to give testimony on behalf of Management, should Management's decision be subjected to the scrutiny of a court of law, irrespective of whether the concerned Employee is still in employment at the time he is required/summoned to give testimony in court.

VIOLATION OF THIS POLICY

Any breach of this Policy and of the related legal provisions in relation to a case of alleged Child Labour and Forced Labour may lead to appropriate disciplinary action and/or the matter being reported to the Police and/or to the Ministry of Labour Human Resource Development and Training.

Failure to comply with the provisions of Section 8 and of the Workers' Rights Act 2019 (as amended) is an offence and is punishable by a fine and imprisonment.

Any false or misleading information and/or frivolous claims in respect of a case of alleged Child Labour and/or Forced Labour, and/or any retaliation or threat of retaliation against any Employee or Aggrieved Party making a complaint or assisting in any complaint or subsequent investigation, will be considered as a violation of this Policy and will lead to appropriate disciplinary action, which may include dismissal for misconduct and/or legal proceedings.

REVISION OF THIS POLICY

The Policy shall be reviewed and updated in accordance with amendments to mandatory legal provisions and on a periodic basis to ensure it remains relevant to Almarys Group. The revised version of the document will be submitted to the Board of Almarys Limited for approval and once approved will automatically apply to the Associated Companies within Almarys Group to which this Policy applies.

Requests for revision or amendments to this document must be submitted to the Group Compliance Function or the Group People Function for review and subsequent updates.