

How Roquette prevents Child Labour and protects Young Workers

Policy



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For the purposes of this policy, the following definitions apply:

"Child" refers to any individual who has not yet reached the age of sixteen (16) years.

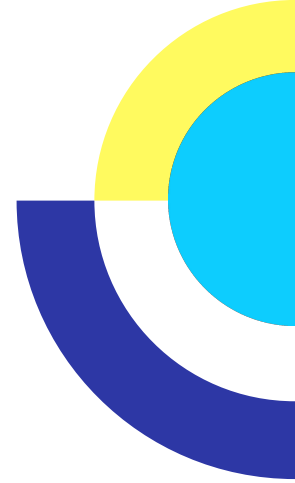
"Young Workers" refers to individuals who are sixteen (16) years old or older but have not yet reached the age of eighteen (18).

"Work" shall encompass any form of employment or activity conducted on Roquette sites by Roquette, for Roquette or on behalf of Roquette, including but not limited to apprenticeships, training programs, and work/study schemes. This definition extends to contractual, temporary, as well as subcontracted activities such as waste management, catering, transport & logistics, cleaning, maintenance, material handling services & building works.

"Hazardous work" is referred to work which, by its nature or circumstances in which it is carried out, is likely to jeopardise the health, safety or morals of children. The list of hazardous work is annexed to this policy.

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Editorial



At Roquette, we are committed to improving the lives of people around the world and this engagement starts with upholding human rights, integrity, and the care of our people above all else. This is how we've become a world leader. That's who we are.

We stand by our values in everything we do. Our culture is based on the following:

Authenticity – Excellence - Forward looking - Well-being

At Roquette, we believe that the talents shaping our company must never include child labour under any circumstances, and that young workers are involved at Roquette only in conditions that ensure their full protection and development. **Children and young workers are a particularly vulnerable group.** Protecting children's and young worker's rights is at the core of our responsibility, and the trust placed in us by our stakeholders depends on our unwavering commitment to the highest standards of integrity and honesty in this regard.

Roquette will not employ directly or indirectly, any person under the age of 16 under any circumstances.

Child labour harms children's mental and physical development. It also harms business as it can lead to legal sanctions, loss of productivity, disruptions in production and reputational damage.

Child labour is a violation of fundamental human rights and of Roquette's values. According to the International Labour Organization, which sets international standards, **work must not be performed by anyone under the minimum working age** of 15 (or higher if stipulated by national law).

Roquette has chosen to enforce a stricter rule as the employment of individuals below the age of sixteen (16) is strictly prohibited for all operations conducted by Roquette, but also for operations and services provided to Roquette by any third-party suppliers on Roquette sites.

The local implementation of this policy at any Roquette site shall give precedence to national labour regulations whenever they impose stricter requirements for the protection of children and the working conditions of young workers.

“Child labour has no place in a modern, competitive and sustainable family company like Roquette.”

Thierry Fournier
CEO of the Roquette group

Ground rules

This document provides **practical rules** for all Roquette sites to prevent child labour through effective age verification, to protect young workers, and to effectively address any such situation should it occur.

To prevent child labour and ensure special protection for young workers under eighteen (18), you must follow this **set of basic principles**, which are **mandatory** and universally applicable, no matter the case:

1. Access to Roquette sites is prohibited to individuals below 16 years old (except exceptional circumstances such as school visits or employee family day, etc.).
2. Direct employment at Roquette is restricted to individuals who are 18 years or older for permanent positions and to individuals who are 16 years or older for apprenticeships, training programs, and work/study schemes (see Part "Child labour prevention & remediation" of this policy for implementation).
3. The same obligation applies to third parties providing outsourced services or temporary labour workforce on Roquette sites (see Part "Child labour prevention & remediation" of this policy for implementation).
4. Although young workers may be allowed on Roquette sites under certain circumstances, their working conditions are governed by specific rules, (see Part "Protection of young workers").
5. In the event that child labour is identified, the immediate priority is safety: the child must safely be removed from the site. However, with the best interests of the child in mind, measures must be implemented to remove the child from the child labour situation and provide for the transition of any such child to enable her or him to attend and remain in quality education until no longer a child (see Part "Protection of young workers" of this policy for implementation).
6. The site HR Manager and the Plant Manager are responsible for overseeing, monitoring, and ensuring the effective implementation of these above rules and acting as point of contact for any question or alerts.



Child labour prevention & remediation

Making **age verification** a central component of Roquette's staffing policy for direct employment, as well as **managing the risks** associated with recruitment agencies and subcontracting, plays a vital role in the prevention of child labour.

Age verification for direct employment

Every Roquette site is responsible to implement a local age verification system for direct employment including:

- following the age screening steps in the Workday hiring process to generate a mandatory validation mechanism for all new hires under 18. In any case, an identity card copy is a prerequisite for this process.
- training local HR teams on Roquette's requirements to carry out age verification, including how to assess the authenticity of identification documents, and how to escalate cases of suspected falsification. Training should notably cover practical checks of identity cards such as verifying the consistency of photos, dates of birth, and official seals against reliable reference standards. In cases of suspected falsification, the local HR teams must immediately suspend the recruitment process and escalate the case to the Site HR Manager and Plant Manager for further review.
- maintaining accurate and secure records of all age verification checks for traceability.

Focus

Enhanced Age Verification in High-Risk Contexts

In situations where candidates do not possess a birth certificate or other official identity documentation proving their age - a circumstance common in certain countries - or where it is known that falsified documents are easily obtainable, local HR teams are encouraged to adopt enhanced verification techniques, such as:

- Cross-checking multiple documents and written attestations: comparing information from different sources can help identify inconsistencies and detect fraudulent documents.
- Conducting interviews: engaging with candidates who appear younger than the minimum legal working age can help gather additional information and clarify concerns.
- School certificates: academic records can serve as a reliable source of information to support age verification.
- In case of persistent doubt and when permitted by local law, pre-employment medical examination: this may help provide an indication of a candidate's actual age while also assessing physical fitness for work. Respect for the individual's right to privacy must always be ensured.

Managing risk factors with external labour/contractor agencies

During peak seasons or labour shortages, when large numbers of workers are necessary, proper hiring processes and age verification may be neglected. The use of external agencies (such as staffing, labour or recruitment agencies), subcontractors and service providers may also increase the risk of child labour.

The below measures must be implemented to manage this particular situation:

Implement Risk Assessment and Mitigation Measures:

- Before selecting a labour/staffing agency, collaborate with the local purchasing teams to evaluate any potential risks involved, including those related to the agency's reputation and recruitment practices, especially in high-risk regions or subcontracting chains.
- Ensure that the agency has established processes to prevent issues, particularly those related to age verification, transparent recruitment practices and worker management. Check with each external labour agency that they maintain records of workers hired by them and placed within Roquette, along with the relevant documents.
- Make sure the relationship with the labour/staffing agency is framed by a written contract.
- Before signing the service contract with external labour/staffing agencies, ask that the following Child Labour Prevention clause be added to the contract. If the provider refuses, reach out to the Legal Department for support:

The [labor/contracting agency] acknowledges that Roquette's Child Labor Policy has been communicated to them in writing and commits to abide by it. The [labor/contracting agency] will allow audits and inspections by Roquette or a third party appointed by Roquette to confirm ongoing compliance with the terms of this Policy. The [labor/contracting agency] is required to report any suspected child labor case including "near miss cases" to Roquette.

Roquette will view any violation of Roquette's Child Labor Policy by the [labor/contracting agency] as a material breach of the contract and may terminate the without prior notice.



- If the external staffing agency has been identified as a “risky supplier” by Roquette’s chosen risk rating methodology, the corresponding action plan must be implemented, notably, audits must verify the effectiveness of age verification processes and recruitment records and, where relevant, include document reviews and worker interviews to ensure no minors are employed or supplied.

Communicating the Child Labour Prevention Policy:

This Policy is available on Roquette’s website, as well as on Roquette’s intranet (ONE).

It must also be communicated clearly to any labour/staffing agencies that they must follow our Child Labour Prevention Policy. To ensure effective communication, for all external labour/ contractor agencies, the Policy must be attached to the contract, either when first concluded (new agencies) or when renewed (for the existing ones that have not received the Policy).

Recommendation: Strengthening local collaboration and employee awareness as preventive measures

Roquette sites are encouraged to raise awareness among their adult employees about the importance of education, with the objective of keeping children in school and away from the labour force. Such awareness initiatives aim to discourage parents from involving their children in work activities and to reinforce the long-term benefits of education for both families and communities.

Child labour remediation

Child labour remediation refers to the process of removing a child from a labour situation to ensure safe and adequate alternatives for them, such as reintegrating them into the education system or, if they are above the minimum age for work, creating an opportunity for them to work in a non-hazardous job.

What should you do if a child were to be found at a Roquette site?

A child may be identified by a Roquette employee or other parties at a production site, or a child may accompany their parents or guardians to the production facilities and can either be playing or helping their parents with some tasks to be kept busy.





In this scenario, **you must:**

- The first thing to do is ensure that the child is safe and does not feel in any way threatened or scared by the situation
- Talk to the child in a calm manner, offer information about yourself and ask open-ended, general questions to establish a rapport. Listen to the child to understand their needs. Assure them that they have done nothing wrong and are not “in trouble”. In a kind manner explain why they can’t be working
- Escort the child safely out of the production area, and arrange for a safe place for the child, e.g., office room

Contact your local HR representative as well as the site manager!

- If the child’s parents or guardians are present onsite, explain clearly to them that children must not be brought to or left at production facilities or workplaces, as this exposes them to significant health and safety risks
- If the child’s parents or guardians are present onsite, contact them and explain the situation
- Ensuring the child leaves the site without exposure to further risks
- The site HR representative or the site manager must document and keep records of each child labour case and **promptly update Roquette corporate Compliance (compliance@roquette.com).**

All interventions are aimed at positively impacting the child, and their family: Roquette’s primary concern should be to act in the best interest of the children, above the interests of all other stakeholders, including parents, institutions, and community leaders.



Roquette sites are encouraged, whenever possible and within the time allocated to their employees, to participate - within their sphere of influence and in collaboration with other companies in the sector - in programs aimed at the reintegration of former child workers. Such programs may include providing opportunities for education or skills development. The objective of developing, participating in and contributing to policies and programmes that put the best interests of the child first, is to provide for the transition of any such child to enable her or him to attend and remain in quality education until no longer a child. Such efforts help address child labour remediation in the long term, in a more global and systemic way.

To that end, the site HR manager and the site manager are encouraged to bring to the attention of the Public Relations' team any opportunity to work collaboratively with local authorities, child rights organizations, trade unions, other companies operating in the same area, industry associations, or employer organizations, to develop a collective approach aimed at addressing the root causes of child labour and identifying sustainable solutions.

Protection of young workers

The employment of young workers on Roquette sites is limited to specific circumstances (apprenticeships, training programs, and work/study schemes) and must obey the following rules:

Prohibition of hazardous work

On Roquette sites, young workers must not be asked to conduct hazardous work.

In order to enforce this prohibition, the Group commits to maintaining a list of hazardous works (see below in Annex) and conduct onsite checks to ensure no young workers are engaged in such activities.

Working hours

Many countries have specific working hour regulations for young workers and Roquette has chosen to apply a strict approach. Unless the country's regulations are stricter, Roquette sites must respect the following:

- No night work for young workers.
- No overtime, in order to allow sufficient time for education and training (including time needed for homework), daily rest, and leisure activities.
- Young workers must not be confined at the employer's premises after the work day
- At least 12 consecutive hours of night rest each day.
- Respect for customary weekly rest days.
- If the young worker is still in compulsory education, their work must not interfere with their school attendance, nor the ability to study.

Global working conditions

Your workers must never be placed in conditions which:

- compromise their health, safety, or moral integrity,
- which harm their physical, mental, spiritual, moral or social development, or
- which interfere with their schooling or deprive them of the opportunity to attend school

No work without supervision by an experienced person.



The first day of work for young workers

All employees at Roquette undergo HSE induction training at their respective sites. For young workers on manufacturing sites an orientation and HSE training session will be organized before they start working. This session includes a review of all key terms of employment, such as contract details, working hours, and plant regulations.

Through interactive sessions and hands-on practice, ensure that young workers gain a comprehensive understanding of your factory's HSE policies and rules. Training should include:

- **A clear message to ensure young workers understand the importance of safety at workplace.**
- A 'walk and talk' safety tour for young workers highlighting specific safety concerns.
- Review of legal requirements for the protection of young workers, e.g., regular health examination, working hours and types of work, processes or positions they CAN and CANNOT do.
- Review and explanation of the list of not allowed activities/ activities to be strictly supervised.
- Explanation of existing HSE risk control measures, e.g., signage for hazards, collective protection, PPE, Job Safety resources available to support the health and safety of young workers
- Explanation of procedures for evacuation in case of an emergency (location of the nearest meeting point, emergency phone number, location of infirmary etc.).
- **Continuous prevention and check-ins during employment**, to ensure young workers have properly understood procedures, protective measures and are progressively integrated into the team.



Receiving feedback, concerns, suggestions, questions and even complaints from young workers is a good way to identify hazards and prevent real or potential risks and to ensure workers safety. **To support this, HR teams must inform young workers about Roquette's alert SpeakUp system, which allows them to raise concerns safely and confidentially.** This system should be presented as a channel available in all circumstances - for example, to report cases of moral harassment (given their greater vulnerability) or to flag particularly dangerous, strenuous, or hazardous tasks that may not have been previously identified.

Identifying hazardous work and conducting risk assessments for young workers

Organize regular observation walkthroughs of facilities with your key staff to identify hazardous tasks or situations. Ensure that the walkthrough considers:

- Activities of all persons having access to the workplace (including Roquette maintenance, contractors and visitors).
- Physical workload and ergonomic risks (such as manual handling of heavy loads, repetitive movements, awkward postures).
- Infrastructure, equipment and materials at the workplace, whether provided by the factory or external parties.
- The design of work areas, installations, the layout of machinery /equipment.
- Processes, standard operating procedures and overall work organization.
- Long-term hazards (e.g., high noise levels, of noise or exposure to harmful substances or to hazardous energy sources like electricity or pressurized systems).
- Adequacy of the supervision for young workers, to ensure that they are never left alone to perform complex tasks.

What should you do when a young worker (above the minimum working age but under eighteen (18)) is engaged in work breaching one of the above rules?

If young workers are found working in hazardous tasks, or in conditions that do not comply with the specific rules listed above for young workers, you should:

- Remove the young workers from the position, after clearly and calmly explaining why they cannot continue working in this specific role and reassuring them that this decision is made for their own safety and well-being.
- **Contact your local HR as well as the plant manager or use the SpeakUp platform if you are not comfortable reporting this situation locally. Then update Global HR and HSE teams on the situation.**
- Offer them access to a compliant and more suitable position, without reducing their salary or benefits.
- Arrange for health checks and, where relevant, ensure any necessary treatment is provided by a healthcare professional, including for long-term exposure to hazards (e.g., dust, vibration, excessive noise).
- Ensure adequate documentation of the incident and corrective actions to build a record for future audits, continuous improvement, and accountability.
- Monitor the young worker's situation regularly to ensure that they do not gradually shift back to high-risk activities.

This policy enhances the protection and support measures already in place to prevent child labour and to ensure a safe working environment for young workers. However, vigilance remains crucial in addressing persistent challenges, particularly those related to economic and social contexts.

It is therefore essential to continue promoting awareness, education, and collaboration among various stakeholders to ensure a future where the rights and well-being of children and young workers are fully respected and protected.

ANNEX _ Hazardous Work List (July 2025)

Strictly prohibited activities for young workers in any of the Roquette group sites include:

- Working near or use of operating machines with unguarded moving parts,
- Operating motorized vehicles (e.g. forklifts)
- Using of electric tools involving high energy (e.g. angle grinders, arc welding station, drills etc.)
- Handling hazardous chemicals (especially CMR - Carcinogenic, Mutagenic, or Reprotoxic, endocrine disruptors, nanomaterials, corrosive, toxic or sensitizing materials)
- Work in extreme temperature conditions (below 4°C, over 30°C)
- Handling hot liquids
- Working near unprotected hot surfaces (>60°C)
- Accessing electric cabins, regardless of voltage
- Lifting heavy loads (>15kg) without mechanical aid
- Working at heights (>1,5m)
- Working in confined spaces (tanks, silos, etc.)
- Work under hyperbaric conditions
- Working in noisy environment
- Work requiring the use of electromagnetic radiations
- Performing tasks requiring repetitive movements
- Engaging in activities involving risks of lacerations or punctures
- Work involving high frequency vibrations
- Engaging in high-paced work
- Working in AtEx (Explosive Atmosphere) areas

