

Zero-tolerance policy on child labor and remediation plan

SelleRoyalGroup

SCOPE AND FIELD OF APPLICATION

This Policy outlines the Company's commitment to absolutely prohibiting child labor and establishes the framework for preventing and managing any cases that may be identified along its supply chain.

The Policy applies to all Company operational sites and to all parties acting on its behalf within the supply chain, including suppliers, subcontractors, contractors, labor agencies, and any third-party employing personnel for the provision of goods or services.

REFERENCES AND DEFINITIONS

The Policy is aligned with ILO Conventions No. 138 and No. 182, the SA8000 Standard, and the main requirements of international social audits.

For the purposes of this document:

- a "child" is any person under 15 years of age, or under the legal minimum age for completing compulsory schooling or entering employment, where such age is higher;
- a "young worker" is a person between the legal minimum age and 18 years.

COMMITMENT AND ABSOLUTE PROHIBITION

The Company adopts a zero-tolerance policy toward child labor.

Hiring or employing individuals below the applicable legal minimum age is strictly prohibited.

Where young workers are employed, the Company and its suppliers must ensure full compliance with applicable laws, ensuring they are not assigned hazardous tasks, night work, excessive overtime, or activities incompatible with schooling or with the protection of health and safety.

Any practice that may facilitate age falsification or the withholding of personal documents is strictly prohibited.

PREVENTION AND SUPPLIER RESPONSIBILITIES

Suppliers must implement effective and documented procedures for age verification prior to hiring and for ongoing compliance monitoring.

These procedures must extend to subcontractors and labor agencies through appropriate due diligence and specific contractual clauses. Accurate personnel records, training for staff involved in recruitment, and confidential, retaliation-free reporting mechanisms must be ensured. All suppliers must include this Policy (or documents of equivalent value and content) in their commercial relationships with subcontractors and employment agencies, ensuring full compliance with its requirements.

CASE MANAGEMENT AND INTERVENTION PRINCIPLES

When a case of child labor is identified or reasonably suspected, the work activity must be immediately stopped, ensuring the protection of the child and the absence of punitive measures.

SelleRoyalGroup

Economic support must continue through an appropriate financial contribution or compensatory wage until the child reaches the legal working age, unless otherwise required by law or agreed with the competent authorities. The supplier must appropriately inform the child and involve parents or guardians, ensuring confidentiality and documenting decisions taken.

The monitoring of each individual case shall last no less than twelve (12) months from the date the non-compliance was identified.

ASSESSMENT AND REMEDIATION PROGRAM

Within a reasonable timeframe after identifying the case, the supplier must conduct a structured assessment to verify age, understand family and economic circumstances, identify the causes of employment, and assess any health and safety risks.

Based on this analysis, a documented and customized remediation program must be defined. The program must include appropriate educational solutions, such as school re-entry or training programs, as well as coverage of associated costs, including materials, transportation, or other necessary expenses.

Where appropriate, the possibility of offering a legal and decent job to an adult household member may be assessed to mitigate the family's economic impact.

Each case must be assigned to a responsible contact person for monitoring and, when necessary, managed in collaboration with competent authorities, social services, or specialized organizations.

PREVENTION AND CONTINUOUS IMPROVEMENT

Following each case, the supplier must carry out a root cause analysis and strengthen its recruitment and selection procedures, along with the control and training activities for personnel, in order to prevent the recurrence of the non-conformity.

Documentation related to age verification and case management must be maintained and made available during audits, in compliance with data protection laws.

CONSEQUENCES FOR NON-COMPLIANCE

Failure to cooperate, the absence of adequate remediation measures, or the repeated occurrence of violations may result in the implementation of mandatory improvement plans, additional audits, suspension of orders, or termination of the business relationship, in accordance with contractual agreements and applicable laws.

In particular, the Company reserves the right to:

- a) request an Action Plan within thirty (30) days from the date the non-compliance becomes known;
- b) conduct audits, including unannounced audits;
- c) suspend ongoing orders until the non-compliance has been resolved;
- d) terminate the contract in cases of repeated violations or failure to implement adequate remediation measures.

SelleRoyalGroup

REPORTING

With regard to the Company, reports are managed through the corporate whistleblowing channel, which is compliant with EU Directive 2019/1937 and ensures anonymity, confidentiality, and protection against retaliation. The channel is accessible at the following link: <https://selleroyalgroup.wbisweb.it>

VALIDITY AND REVIEW

This Policy is effective as of the date of issuance. The Group Purchasing Department is responsible for the implementation of this Policy, the monitoring of suppliers, the analysis of non-compliances, and the periodic review of related processes.

The Policy is shared with suppliers via email, with a request to read, understand, and accept its terms through the signature of the document by a legal representative of the company.

V1 - 01/03/2026

COMPANY NAME

COMPANY CONTACTS

Name and surname

Email and phone number

STAMP AND SIGNATURE

For acknowledgment and commitment by a legal representative of the Company.
