

APPROVED:

By order No. VMGco/22-05V of 1 February 2022  
of CEO of VMGcorp, UAB

## REGULATIONS FOR THE PREVENTION OF CHILD LABOUR IN THE COMPANIES OF VMG GROUP

### I. GENERAL PROVISIONS

1. The Regulations for the Prevention of Child Labour in the Companies of the VMG Group (hereinafter referred to as 'the Regulations') establish the procedure for the prevention of child labour and support for young workers in the companies of VMG Group and supplier companies, taking into account the requirements of IWAY Standard on child protection.

2. The Regulations are drawn up, applied, amended, and supplemented in accordance with the IWAY Standard and applicable legal norms.

3. Amendments and supplements to the Regulations are binding on all companies of the VMG Group.

### II. MAIN TERMS AND DEFINITIONS

4. **'Company or company of the VMG Group'** means a Company included in the List of Companies of the VMG Group approved by the Strategic Council;

5. **'Young worker'** means an employed person who is under the age of 18 but older than the minimal legal working age;

6. **'Vocational training'** means various forms of practical training and work experience aimed at achieving training objectives. Vocational training shall be conducted in collaboration with educational establishments or in accordance with a training programme approved by a competent authority or shall act as an advisory guidance programme to assist the learner in choosing his or her profession or field of study.

7. **'Supplier'** means a company or organisation with which a company of the VMG Group has a contract, as well as any subcontractors relating to that contract and delivering products, services, raw materials, or components.

8. **'Child'** means any person below the age of 18 years, except for the cases where the age of majority is reached earlier under the laws applicable to the child.

9. **'Child labour'** means work performed by children below the minimal legal working age, which deprives them of their childhood, potential, dignity and impairs their physical and mental development. A work performed by anyone under the age of 18 may also be considered 'child labour', depending on the type of work, working hours and the conditions under which the work is performed.

### III. PREVENTION OF CHILD LABOUR IN THE COMPANIES OF THE VMG GROUP

10. All employees, including young workers, of the companies of the VMG Group, are employed in accordance with applicable laws.

11. Children under the minimal legal working age do not perform any work at the companies of the VMG Group.

12. Children, whether they are young workers or vocational trainees, do not perform any hazardous work or night work at the companies of VMG Group.

13. The staff responsible for hiring an employee have to check the employee's identity document (passport or identity card) before hiring. A copy of the respective document is kept in the employee's personal file.

#### **IV. PREVENTION OF CHILD LABOUR AT SUPPLIERS**

14. Companies of VMG Group do not use the services of suppliers using child labour nor do they purchase products, raw materials, or components from such suppliers.

15. Suppliers are notified of such a provision, by making them aware of the requirements of IWAY requirements in writing.

16. The heads of subdivisions of the companies of the VMG Group working with suppliers are responsible for acquainting the suppliers with IWAY requirements.

17. The Company does not allow an employee of the supplier to enter the Company's area if there is a suspicion regarding the age of such person and if an identity document confirming the age is not submitted.

18. In case of suspicion that the supplier uses child labour, it is obligatory to check the data concerning the youngest employee at the supplier.

19. The age of the supplier's employees may be verified during a visit, during an IWAY audit or upon receipt of information about a violation of conditions concerning child labour prevention.

20. The employees of the agency providing security services must ensure that no children enter the production area of the companies of the VMG Group.

#### **V. ACTIONS TO BE TAKEN HAVING DETECTED CHILD LABOUR**

21. If a supplier has been found to be in non-compliance with the requirements of the IWAY standard for the prevention of child labour, the Company's employee responsible for the collaboration with the supplier has to request the supplier to provide a document confirming the age of the respective person.

22. In the event of establishing the fact of child labour at supplier, the Company's employee responsible for the collaboration with the supplier has to request the supplier to terminate the employment relationship with the child in order to ensure the compliance with the child labour prevention requirements of IWAY Standard and of the companies of VMG Group.

23. The information concerning illegal child labour has to be provided to the State institution responsible for the protection of children's rights and the State Labour Inspectorate.

#### **VI. PROMOTING YOUNG WORKERS**

24. Vocational training and guidance projects are carried out in Companies in cooperation with vocational training institutions to inform young workers about job opportunities and enable them to enter the labour market smoother.

25. Trainees in vocational trainings may participate in vocational guidance projects from the age of 14.

26. The trainees in vocational trainings who reached the age of 18 may be admitted to practical training related to their education under practical training contracts. Practical trainings are carried out in accordance with the requirements established by laws.

27. Due to occupational safety and health requirements, the workers for jobs to be carried out in the production area of the companies of VMG Group are employed only from the age of 18.

28. The admission a trainee in vocational training for practical training under a contract or the employment of a young worker have to be in compliance with the restrictions imposed by the state in relation with the nature of work, work and rest time, and occupational safety and health of minors, as well as the conclusion of an employment contract and provision of additional guarantees, as provided for by laws.

## VII. RESPONSIBILITY

29. Employees of the companies of VMG Group shall be responsible for the implementation of these Regulations according to the procedure established by laws and the local normative legal acts of the respective Company.