

RASAD NIGERIA LIMITED

POLICY 02

Child Labour Prevention and Remediation Policy

VERSION	Version 1 · September 2026
POLICY OWNER	Sustainability Lead
APPROVED BY	Board of Directors, Rasad Nigeria Limited
REVIEW	Annually, or sooner if a serious case or a change in law requires it

1. Why this policy exists

Children belong in school, not in hazardous farm work. Child labour remains a real risk in West African cocoa and cashew. We do not pretend it is absent from our sourcing areas. We look for it, we act when we find it, and we put the child's wellbeing ahead of any commercial interest.

2. Scope

This policy applies to Rasad's own operations, including hubs, warehouses and transport, and to every farmer, LBA, aggregator, haulier and contractor in our supply chain in Nigeria and Benin Republic.

3. What we mean

- **Child:** any person under 18 years of age, as defined by the Child's Rights Act 2003.
- **Child labour:** work that is unsuitable for a child because of their age or the nature of the work, or that harms their health, safety, schooling or development.
- **Hazardous work:** work that is likely to harm a child's health, safety or morals. On farms this includes using machetes or sharp tools to clear land or break pods, carrying heavy loads, spraying or handling agrochemicals, burning, felling trees, working at height, working long hours or at night, and working far from home without an adult.
- **Worst forms of child labour:** slavery, trafficking, debt bondage, forced labour, commercial sexual exploitation, use in illicit activities, and hazardous work (ILO Convention 182).
- **Acceptable help:** age-appropriate light tasks for a family farm, done under adult supervision, outside school hours, and that do not harm health or schooling.

4. Our rules

1. Rasad does not employ anyone under 18, directly or through contractors.

2. We follow ILO Conventions 138 and 182, both ratified by Nigeria, the Labour Act, the Child's Rights Act 2003 and its state laws, and the Trafficking in Persons (Prohibition) Enforcement and Administration Act 2015.
3. Suppliers must not use child labour or the worst forms of child labour, must not use any child under 15 for work other than acceptable family help, and must not give any child under 18 hazardous work.
4. We never respond to a child labour case simply by dropping the supplier. Dropping a supplier moves the problem out of sight without helping the child. We stay engaged and remediate, unless the supplier refuses to cooperate or the case involves trafficking or forced labour.

5. Prevention

- **Awareness:** we train farmers, LBAs, hub staff and field agents at least once a season on what child labour is, what hazardous work looks like and how to report it.
- **Community engagement:** we work with community leaders, schools and parents' groups in our sourcing areas (see Policy 06).
- **Livelihoods:** higher farm incomes reduce the pressure to use children's labour. Our training, yield programmes, certification premiums and fair payment terms support this.
- **Education:** we support children's access to school through enrolment support, school materials, scholarships and mentorship for farmers' children.
- **Supplier contracts:** every supplier signs the Supplier Code of Conduct (Policy 08), which includes these rules.

6. Identification and monitoring

We run a child labour monitoring and remediation system (CLMRS) in our sourcing communities, built on the model used across the West African cocoa sector. It includes:

- household visits by trained community facilitators, prioritised by risk;
- farm visits and spot checks by field agents during mapping, buying and training;
- recording of household and child information, handled confidentially under the Nigeria Data Protection Act 2023;
- reports received through our grievance channels (Policy 07).

Staff and suppliers must report any suspected case to the Sustainability Lead within 24 hours.

7. Escalation

Situation	What happens
Child in immediate danger, or signs of trafficking, forced labour or abuse	Act at once to secure the child's safety. Report to the relevant authorities (for example NAPTIP, the police or state social welfare) and notify the Managing Director the same day.

Situation	What happens
Child doing hazardous work	Stop the hazardous task the same day, agree an immediate change with the household, and open a remediation case.
Child out of school or working too much	Open a remediation case and agree a plan with the family.
Supplier refuses to cooperate or repeats the breach	Suspend purchases. Termination follows if there is no change.

8. Child-centred remediation

Remediation starts from what the child and family need, not from what is easiest for us. For each case we:

1. Speak with the child and family in their own language, respectfully and with consent, and involve a trusted adult.
2. Agree a plan suited to the child. It may include school enrolment or re-enrolment, uniforms, books and fees, bridging classes, birth registration, vocational training for older children, help with farm labour for the household, or income support for the family.
3. Assign a named case worker and follow up at least every three months for at least one year after the child is out of child labour.
4. Close the case only when the child has been in school or safe work for at least two follow-ups in a row.
5. Keep all case records confidential and share them only on a need-to-know basis.

We fund remediation directly and with specialist partners. We never cut payments to a household as a punishment in a way that could push the child deeper into work.

9. Safeguarding

- Photos or stories of children are never used for marketing.
- Anyone working with children on our behalf must be vetted and trained, and must follow a safeguarding code.
- No staff member may be alone with a child in a closed space.
- Any abuse or exploitation by a Rasad worker or partner leads to immediate suspension, a report to the authorities and dismissal if proven.

10. Roles and responsibilities

Role	Responsibility
Board of Directors	Approves this policy and reviews child labour results each year.

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Managing Director	Accountable for resourcing and for escalations to the authorities.
Sustainability Lead	Owns this policy, the CLMRS, case management and partner oversight.
Operations and Procurement Lead	Applies supplier consequences and makes sure hub staff report concerns.
All staff and suppliers	Report concerns within 24 hours and cooperate with remediation.

11. Monitoring and reporting

We track: households covered by monitoring, children identified in child labour, cases under remediation, children returned to school, cases closed, and average time to close. We report these figures to buyers and financiers on request and publish a summary each year.

12. Related policies

Policy 01 Responsible Sourcing · Policy 03 Human Rights and Labour · Policy 06 Community Engagement · Policy 07 Grievance Redress and Whistleblower Reporting · Policy 08 Supplier Code of Conduct