



CHILD LABOR POLICY

PURPOSE

Our Child Labor Policy is our position on employing minors and aims to ensure that our company, its subsidiaries and everyone we're connected with follows the law and cares for children's interests.

International, local and federal child labor laws are stricter today than they were years ago. But millions of children are still forced to work in bad conditions all around the world, even in developed countries.

As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn't take part in children's exploitation and also helps end it to the best of our ability.

SCOPE

This policy applies to all Associates of RCO, Subcontractors and their employees ("Subcontractors") and Agents and their employees ("Agents") doing business with RCO, its subsidiaries and affiliated companies.

POLICY

Young Children

When it comes to young children (younger than 14), we don't want to stand in the way of their health, schooling or free time. That's why we don't and won't employ anyone younger than 15 years of age and require our subsidiaries to do the same, regardless of the country they're in.

We're also committed not to do business with any organization that employs children younger than 15. We'll include this condition in every contract we sign and reserve the right to break the contract without penalty if our stakeholder violates this condition and refuses to agree on or follow through with an elimination plan.

Legal exceptions

Parental employment. We might occasionally do business with family-owned businesses. Those businesses are usually allowed to employ the owner's young children as long as the work isn't too hazardous (e.g. mining, manufacturing). We accept this regulation, but we'll still dissolve our contract if it comes to our attention that these children are exposed in danger or are working consistently during school hours.

Occasional work. Sometimes, parents bring their children to work to teach them skills and introduce them to a work environment. They may also hand them some tasks to complete (e.g. a painter may ask his child to help with a painting job he's taken). This is an acceptable practice, as long as it doesn't deprive children of school on a consistent basis or puts them in any danger. (For example, the painter shouldn't allow his son to inhale toxic paint or ask him to climb on scaffolding.)



Older Children

When it comes to employing children who are older than 15, we'll always follow the local and international laws. As a general rule, these children can have a job, but they should never do work that jeopardizes their health and safety or affects their schooling and development.

With this rule in mind, we may employ children older than 15 for light work such as [packaging, manual assembly, janitorial, clerical, etc.] They will not use any heavy or dangerous equipment, chemicals or vehicles when working.

We'll determine their work hours and wage based on applicable laws. We won't employ children for more than the maximum weekly or daily hours allowed.

These are mandatory conditions when forming partnerships or other business relationships. We'll refuse to do business with anyone who employs children of any age in hazardous or exhausting jobs or doesn't follow applicable laws on working hours or pay. We also expect them to communicate and enforce this Child Labor Policy to their own contractors.

ROLES AND RESPONSIBILITIES

RCO Associates, Subcontractors and Agents within the scope of their employment or contract relationship with RCO will:

- Require hiring managers and HR to avoid hiring minors under the legal age for working. We also expect them to know and follow this policy and laws on wages and hours for older children.
- Keep and validate documentation verifying our employees' age after they're hired. If we discover that we've hired a minor under the age of 18, we'll review applicable laws and adjust working hours accordingly.
- Communicate our Child Labor Policy to organizations we're connected with and ensure our contracts have the right stipulations.
- Audit suppliers and partners (especially those in industries with high child labor risk) periodically to ensure they aren't involved in inappropriate child labor.
- Demand and monitor an elimination plan in cases where suppliers discover child labor in their business.

Subcontractors and agents will communicate RCO's Child Labor Policy to its employees as well as the Company's intent to enforce same.



REPORTING AND RETALIATION

When informed of or witness to a violation of this policy, or when in doubt about the propriety of a particular course of action, RCO Associates, Subcontractors and Agents are encouraged to contact the RCO Manager of Human Resources. Communications can be made to the RCO Manager of Human Resources every day, 24 hours a day by email at cliff.weyhing@rcoeng.com. RCO will not tolerate any form of retaliation against anyone who, in good faith, communicates facts that could constitute a violation of this policy.

Questions regarding this policy can be directed to the RCO Manager of Human Resources (for Associates) or the RCO Corporate Purchasing Manager (for Subcontractors and Agents).