

Control No: HR 111

Policy Name: Child Labor Policy

Responsible Corporate Function/Business Segment: Human Resources

Effective: 01 January 2021

Coverage: Global – All employees

Policy Overview & Objective

The Greif Way and the Greif Code of Conduct requires the directors, officers and employees of Greif, Inc. and each of its affiliates (collectively, “Greif”) to observe and obey all applicable laws, rules and regulations at all times, including those in relation to the protection, welfare and health & safety of children.

As a responsible corporate citizen, Greif does not tolerate the use of child labor or other acts that violate labor laws or fair employment practices such as, but not limited to – forced labor, human trafficking and exposing children or young workers to hazardous work.

Greif acknowledges that each country may have specific rules and laws that govern the employment of children or young workers. It is the intent of this Policy to recognize those differences and to ensure that the applicable laws addressing such employment are followed per the requirements of each country.

The Policy

Prohibition of Child Labor and Other Illegal and/or Unfair Employment Practices

In line with the worldwide movement against child labor advocated by organizations such as the ILO* and the OECD**, Greif does not and shall not employ children under age of 16 and/or allow children between age 16 and 18 (“young workers”) to be engaged in hazardous work. If a national or local law or regulation is stricter and, respectively, prescribes a minimum working age greater than 16 years, or imposes additional restrictions on activities such as hazardous work, such stricter national or local laws and regulations shall be complied with and prevail over this Policy. If young workers are employed, Greif shall ensure that this work does not preclude their education and schooling.

**The International Labor Organization which is the specialized agency of the United Nations dealing with labor issues such as international labor standards and social justice.*

***The Organisation for Economic Co-operation and Development (OECD) whose mission is to promote policies that will improve the economic and social well-being of people around the world.*

Implementation within Greif and in Relation to Greif’s Business Partners

All Greif employees have the responsibility to implement and ensure compliance with this Policy. Children who work in violation of this Policy shall be removed from the workspace immediately to enable them to return to school to complete their education. Young workers who work in violation of this Policy shall be moved to a different position which complies with this Policy and takes into account their vulnerable situation and educational needs.

Greif employees and management are responsible for making the standards of this Policy known to Greif’s business partners (such as, but not limited to, suppliers and sub-contractors) prior to the establishment of any contractual relationship. If a violation of this Policy by a business partner is detected, Greif shall discuss and take immediate measures with the relevant party to remedy any non-compliance. If a supplier/sub-contractor or other business party refuses to cooperate or, despite remedial actions, fails to consistently meet the standards set forth in this Policy, Greif is entitled to take measures to terminate its relationship with such party.

Any violation of this Policy must be reported to local Management, Human Resources, or the Legal Department. Violations may also be reported through the Greif Ethics Hotline which is available at all times on an anonymous basis.

The Procedure

n/a

References

Please see the related **Human Rights Policy (HR 104 – Global)**.

The **Greif Ethics Hotline** is an option for reporting concerns confidentially and anonymously, where permitted by law. This service is available 24 hours a day, seven days a week. To reach the Greif Ethics Hotline, you can visit greif.ethicspoint.com and file a written report or you can call:

In North America, call toll-free: 866-834-1825

Outside North America, where available, follow the directions at greif.ethicspoint.com under "Report a message".

Addendum

Adopted: 31-Oct-2014

Revised: 01-Jan-2021 – Updated template, updated Coverage, contact for violations, Greif Ethics Hotline and References