
HUMAN RIGHTS AND FAIR LABOUR

Anti-Child Labour Policy

No one under 18 works for Accenti, on an Accenti site or in our supply chain.

Date 21 October 2026
Reference AC-HR-POL-001 · Revision 00
To All employees, temporary personnel, contractors, subcontractors, labour suppliers and suppliers of Accenti LLC

Issue of the Anti-Child Labour Policy, AC-HR-POL-001, Revision 00

Dear colleagues,

I am pleased to issue the Accenti Anti-Child Labour Policy, effective 21 October 2026. It applies to everyone who works for us or on our behalf, at every site, camp, workshop and office we control, and throughout our supply chain.

Our position is simple. No person under the age of 18 is employed or engaged by Accenti in any capacity, and we will not work with suppliers or subcontractors who use child labour. Children belong in school, not in workshops, yards or camps.

Human Resources will verify the age of every person before engagement, and Procurement will carry the same requirement into every contract, purchase order and labour-supply agreement. Site supervisors are asked to make sure that only verified personnel are present in work areas.

If you see or suspect child labour anywhere connected to our work, report it immediately. No one will face retaliation for raising a concern in good faith. Compliance is mandatory.

Yours sincerely,



Ali Ahmed Dhadhaow
Chief Executive Officer
Accenti LLC



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DEFENSE INFRASTRUCTURE

MISSION SUPPORT

Anti-Child Labour Policy

DOCUMENT	REVISION	EFFECTIVE	STATUS
AC-HR-POL-001	00	21 Oct 2026	Approved / Issued
APPROVAL AUTHORITY		POLICY OWNER	
Accenti LLC Management		Human Resources Department	
APPROVED BY		APPROVED ON	NEXT REVIEW
Ali Ahmed Dhadhaow, Chief Executive Officer		21 Oct 2026	21 Oct 2027

Controlled document. Approval is evidenced by the signed and sealed cover letter. The current revision is held by Human Resources; printed copies are uncontrolled.

Accenti LLC does not employ children and does not tolerate child labour, forced labour or the exploitation of young people anywhere in its activities or supply chain. The minimum age for any work under Company control is 18 years.

1 Application

This policy applies to employees, temporary and casual personnel, contractors, subcontractors, labour-supply agencies and suppliers of goods and services to Accenti LLC. It covers recruitment, engagement and work at all Company sites, camps, workshops, warehouses and offices, at client sites, and within the supply chain.



■ A verified adult workforce: every person on site is 18 or over and on the approved personnel list.

2 Mandatory requirements

- 2.1 Minimum age. No person under 18 shall be recruited, employed or engaged in any capacity, including apprenticeship, casual, day-labour, cleaning, catering or domestic work in Company camps. This standard exceeds national minimum ages because Company work takes place in hazardous environments.
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- 2.2 Age verification. Before engagement, every person's age shall be verified against an original, valid government-issued identity document or equivalent reliable evidence, and a copy retained on the personnel file. Where evidence is missing or doubtful, engagement shall not proceed until age is confirmed by a reliable method approved by Human Resources.
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- 2.3 Forced labour and worst forms. Forced, bonded, trafficked or compulsory labour is prohibited. Workers' identity documents shall not be withheld, recruitment fees shall not be charged to workers, and no person shall be given work likely to harm the health, safety or development of a young person.
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- 2.4 Contractors and supply chain. Contracts, purchase orders and labour-supply agreements shall prohibit child labour and give Accenti the right to verify compliance. Suppliers shall verify the ages of their own workers. Higher-risk suppliers, including labour supply, construction, catering, cleaning and transport, shall be assessed before engagement and monitored.



— Site supervisors confirm that only inducted, age-verified personnel enter work areas.



— Suppliers and subcontractors carry the same age requirement into their own crews.

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- 2.5 Site access. Children shall not be present in workshops, yards, fuel and chemical areas or other work areas. Visits by family members under 18 are permitted only with prior authorisation, under supervision and in designated non-work areas.
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- 2.6 Remediation. If child labour is identified, the child shall be removed from work immediately and safely, with the best interests of the child as the primary consideration. Accenti shall work with the family, the supplier and, where appropriate, competent authorities or child-protection organisations to support the child's return to education and to prevent movement into more harmful work. The supplier relationship shall be reviewed and may be terminated.

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- 2.7 Reporting and non-retaliation. Any person who sees or suspects child labour or forced labour shall report it immediately to Human Resources or any member of management. Reports made in good faith are protected; retaliation is a disciplinary offence.
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3 Responsibilities and enforcement

Management shall provide resources and lead by example. Human Resources shall control recruitment, age verification, personnel records and induction training. Procurement shall include this policy in supplier terms and assess higher-risk suppliers. Site supervisors shall check that only approved personnel are present. Breaches by personnel shall result in disciplinary action up to dismissal; breaches by suppliers may result in termination of the contract.

4 Implementation and review

Personnel records shall be checked for age evidence at least annually and supplier compliance verified through assessments and site checks. This policy shall be communicated at induction, displayed at sites and reviewed at least annually or after any identified case, supplier finding or material change.

5 Reference framework

This policy is intended to align with the following, as applicable. Where requirements differ, the stricter standard applies. This document is company policy, not a certification of compliance with any standard.

- 01 ILO Convention No. 182 on the Worst Forms of Child Labour.
- 02 ILO Convention No. 138 on the Minimum Age for Admission to Employment.
- 03 The UN Convention on the Rights of the Child.
- 04 The UN Guiding Principles on Business and Human Rights.
- 05 Applicable labour law in Somalia, the United Arab Emirates and every country where Accenti works.

No one under 18 works for Accenti or on an Accenti site. No exceptions.

Questions about this policy?

Policy queries and concerns go to Human Resources or to the contacts below. Reports are handled in confidence.

Operations — Somalia

Accenti Compound, Marina Hub
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Mogadishu 0100, Banadir, Somalia

Headquarters

United Arab Emirates

Contact

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Policy owner

Human Resources Department
AC-HR-POL-001 · Revision 00

■ On every site

Speak up

If you see a child working on any site we control or in our supply chain, report it immediately to Human Resources or any member of management.

info@accenti.com →





Zero harm to people, property and the environment.

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