

**POLICY STATEMENT REGARDING
Risk Exposure to Minors**

1 PURPOSE

1.1 It is the official hiring policy of BioSpectra not to hire Minors for permanent employment, defined as “persons under the age of Eighteen Years of Age”. Since it is legal to hire minors in the Commonwealth of PA with legitimate working papers under the conditions of the PA Child Labor Act, and since from time to time BioSpectra may allow the employment of an intern, who may be a minor and related to an employee in good-standing, or may allow a minor access to our facilities or volunteer at company events, or may work with a contractor or third party who interact with minors, we hereby institute this formal policy statement. This policy is referenced in the Employee Handbook, Section 2: Employment.

1.2 While the Pennsylvania Child Labor Act requires all minors ages to have a work permit to be legally employed it is the official hiring policy of BioSpectra Inc. that no person under the age of eighteen years of age, shall be employed and if such a person were to be allowed an exception (such as a High School Intern from a longstanding employee), that intern would never be exposed to safety or health risks for chemicals, pesticides, machines or tools, dust or excessive cold heat or noise.

1.3 At BioSpectra, we prioritize the safety and well-being of all our employees including by exception any minor in all our activities and operations. We recognize the vulnerabilities of minors and our duty of care, and have therefore developed the following policy as guidance to mitigate risk exposure:

2 SCOPE

2.1 This policy applies to all U.S based facilities, all employees, volunteers, contractors, and third parties who interact with minors in the course of their duties on behalf of BioSpectra Inc.

2.2 **Definition of Minors:** Minors are defined as individuals under the age of 18 years.

3 GOVERNANCE

3.1 Our leadership team endorses this Risk Exposure to Minors Policy and is committed to providing the necessary resources and support for its implementation throughout the organization. The leadership team works with the Sustainability Team to ensure policy implementation and success

4 IMPLEMENTATIONS

3.1 **Risk Identification and Assessment:** We conduct regular risk assessments to identify potential risks to minors involved in our programs, events, or services. Risks may include but are not limited to physical harm, emotional harm, abuse, neglect, or exploitation.



3.2 Preventative Measures:

- 3.2.1** Hiring Policy: It is the official policy of BioSpectra Inc. not to employ on a regular basis or practice persons under the age of eighteen.
- 3.2.2** Screening: All individuals who have direct contact with minors undergo appropriate background checks and screening processes.
- 3.2.3** Background Checks: All candidates must undergo appropriate background checks which confirm age of employee.
- 3.2.4** Supervision: Adequate supervision is maintained to ensure the safety and security of minors at all times.
- 3.2.5** Code of Conduct: A clear code of conduct is established for all employees as defined in the Employee Handbook.
- 3.2.6** Anonymous and Direct Reporting: Human Resource access by all employees is direct and not withheld to allow for any reporting of suspicions or allegations of abuse or neglect, ensuring swift action and cooperation with authorities as required by law.

4 RESPONSE AND REPORTING

4.1 Any concerns, suspicions, or allegations regarding the safety or well-being of a minor are taken seriously and addressed promptly and confidentially by Senior HR personnel. Reporting procedures are communicated clearly to all staff and volunteers.

5 COMPLIANCE AND REVIEW

5.1 This policy complies with all applicable laws and regulations concerning the protection of minors. It is regularly reviewed and updated to reflect best practices and evolving standards.

5.2 It is the responsibility of all employees, volunteers, and relevant stakeholders to familiarize themselves with this policy and adhere to its provisions.

6 CONTINUOUS IMPROVEMENT

6.1 By adhering to this policy, our goal and priority is to create a safe environment for minors involved in our programs and activities. BioSpectra Inc., is committed to continuous improvement in our safeguarding practices to ensure the protection of minors under our care.

7 POLICY REVIEW

7.1 This policy will be reviewed in the Fourth Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.



Policy Approval: Authorized person name: Paul DiMarco - Title: Sr. Vice President

A handwritten signature in black ink, appearing to read "Paul DiMarco". The signature is written in a cursive style with a long horizontal stroke at the end.

Paul DiMarco | Senior Vice President

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