



**FSC CORE LABOUR
REQUIREMENTS:
TECHNICAL WEBINAR
SELF-ASSESSMENT**

AGENDA

1. FSC CORE LABOUR REQUIREMENTS QUICK RECAP
2. COMMON QUESTIONS ON THE SELF-ASSESSMENT
3. COMPLETING THE SELF-ASSESSMENT

4. CORE LABOUR REQUIREMENTS RESOURCES

5. QUIZ

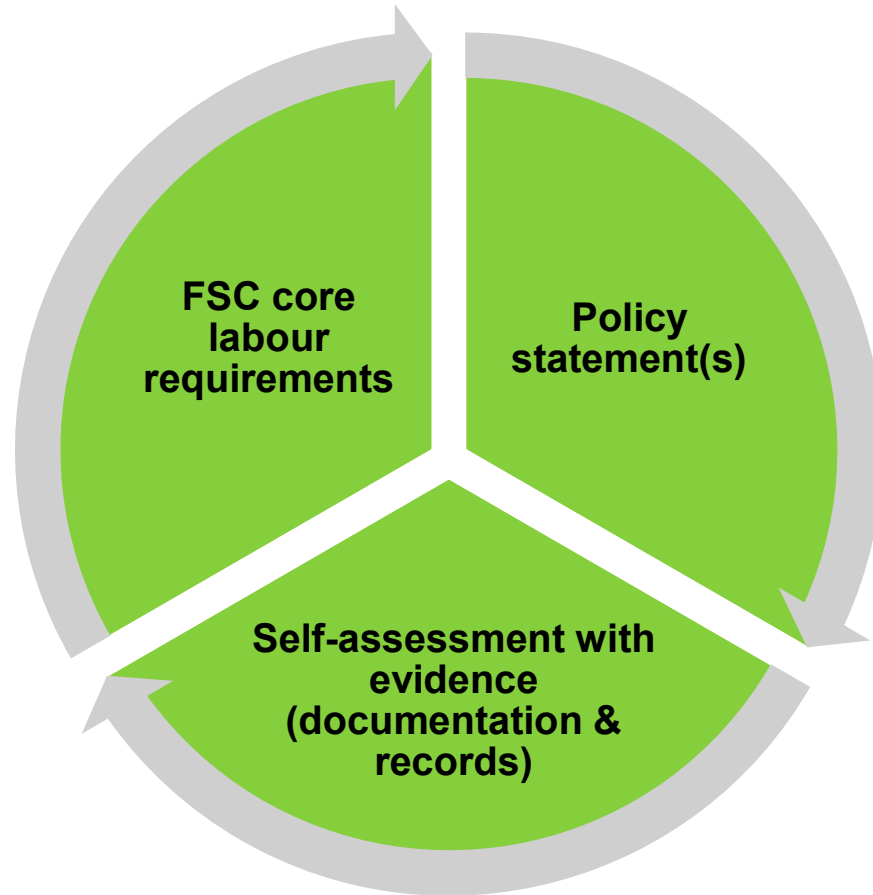
AUDIENCE

CERTIFICATE HOLDERS

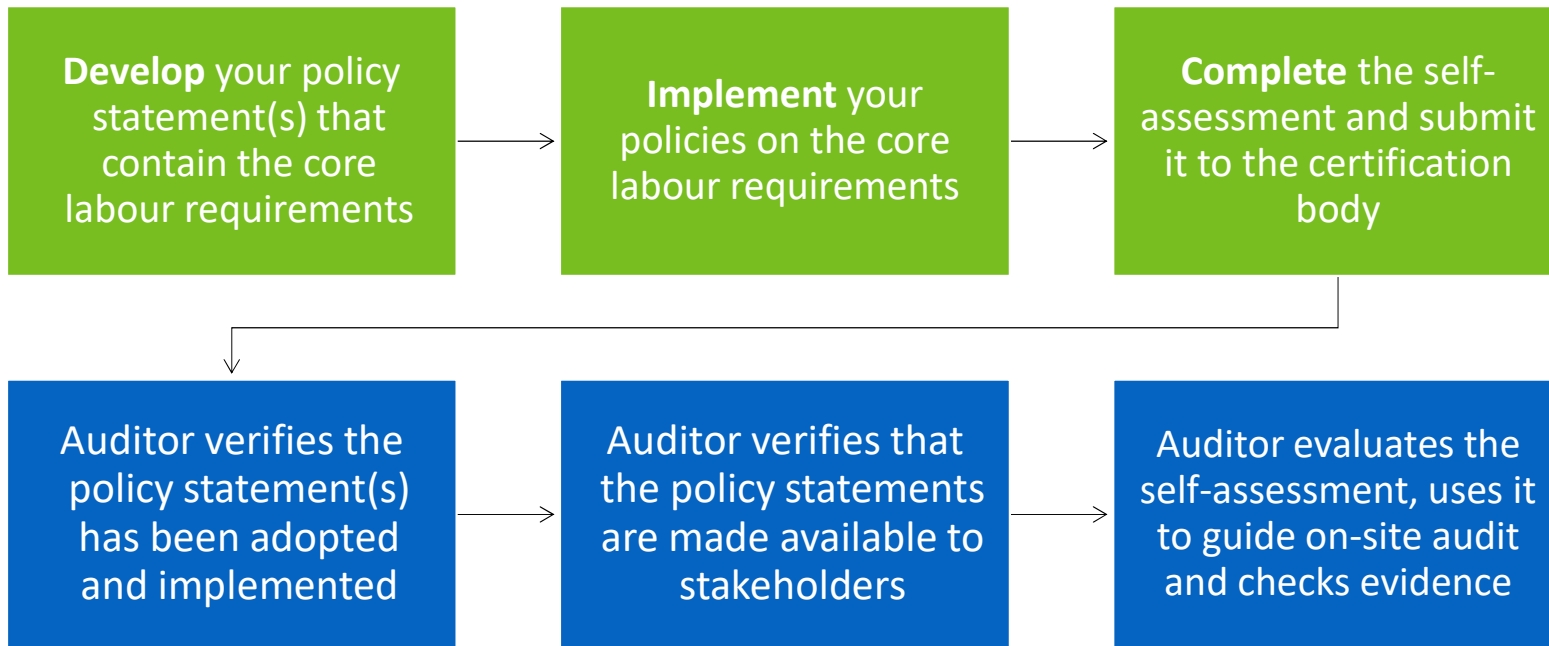
**WEBINARS
RECORDINGS**

CERTIFICATE HOLDERS

THE FSC CORE LABOUR REQUIREMENTS



Implementing the FSC core labour requirements



COMMON QUESTIONS SELF-ASSESSMENT



- 1. Where can we find the self-assessment template?**
- 2. Is the self-assessment available in different languages?**
- 3. Are there rules on how we complete the self-assessment (i.e., one for all sites etc.)?**
- 4. How often do we need to complete the self-assessment?**
- 5. Do we need to complete a new self-assessment every year?**
- 6. Does the self-assessment have to be sent to the certification body before the audit?**
- 7. What if I am the sole proprietor or have no employees?**

SELF-ASSESSMENT

1.6 The organization shall maintain an up-to-date self-assessment in which it **describes how the organization applies the FSC core labour requirements to its operations.** The self-assessment shall be submitted to the organization's certification body.

❑ **Organizational** situation



❑ Additional **evidence** to demonstrate conformity



❑ **Country** situation/legal framework –
i) applicable or conflicting/restricting laws &
ii) ILO convention ratified or not



COMPLETING THE SELF-ASSESSMENT



ORGANIZATIONAL SCENARIO

Type of organization: Multinational food and beverage packaging manufacturing company

CoC certificate: CoC Multisite

Locations: Germany (manufacturing and sales) and India (manufacturing and sales)

Sites: 4

Germany: Sales office and production plant **India:** Sales office and production plant

Number of employees: 1250

Products: plastic-coated paper cartons

Sub-contractors: 2 companies for outsourcing of manual activities – bulk shrink-wrapping food and beverage packaging

CHILD LABOUR i



Questions	Answer
a) Does your organization comply with Clause 7.2? If yes, continue at c).	Yes.
b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.2.	N/A
c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.2.	<p>German sites: Germany has ratified the ILO convention Worst Forms of Child Labour Convention, 1999 (No. 182). The Youth Labor Protection Laws (Jugendarbeitsschutzgesetz) apply to teenagers between 15-18 which grants them rights and protection, children younger than 14 are not allowed to work. We hire apprentices between 16 and 19 as part of the dual education system (duales Ausbildungssystem) where the vocational training is part of a degree course.</p> <p>We hire apprentices in their final year, they must be enrolled in a course at university and provide proof of enrolment and academic results. We also request job references and additional certificates as required. This is checked as part of the selection and recruitment process.</p>

PROMPTING QUESTIONS

- What is the statutory, legal, or regulated minimum age at the place of your operations?
- What measures have you taken to ensure that child labour is not used in your operations?
- Do you register the age (birthday) of your workers and how do you verify that this is the actual age? Do you check the identification papers?
- If you employ workers below the age of 18, describe what measures you have taken to ensure that they don't perform hazardous or heavy work. If there are requirements for training and education, indicate supporting documents.

7.2 The organization shall not use child labour.

7.2.1 The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.

7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal daytime working hours.

7.2.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.

7.2.4 The organization shall prohibit the worst forms of child labour

CHILD LABOUR ii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.2.</p>	<p>German sites: Students agree to a training Contract that outlines the training content, schedule, duration as well as remuneration and holiday entitlement. Employee records are kept which includes their date of birth as with other information such as their tax file number.</p> <p>The National law on the Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) will enter into force in 2024 for companies with more than 1000 employees. We are already in the process of preparing for the implementation of the requirements and the reporting requirements this includes:</p> <p>i) Risk management, analysis and monitoring of our direct suppliers and subcontractors. ii) Reporting annually on the actual and potential human rights impact of our operations. iii) Adopting a policy statement on a human rights strategy and embed appropriate preventive measures with our operations. We will have to submit the report to the Federal Office of Economics and Export Control (BAFA) to ensure compliance. This applies to all the following core labour requirements.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • What is the statutory, legal, or regulated minimum age at the place of your operations? • What measures have you taken to ensure that child labour is not used in your operations? • Do you register the age (birthday) of your workers and how do you verify that this is the actual age? Do you check the identification papers? • If you employ workers below the age of 18, describe what measures you have taken to ensure that they don't perform hazardous or heavy work. If there are requirements for training and education, indicate supporting documents.

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7.2.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.

7.2.4 The organization shall prohibit the worst forms of child labour

CHILD LABOUR iii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.2.</p>	<p>India sites: India has ratified the ILO convention, Worst forms of Child Labour Convention (No.182). The following constitutional and legislation exist, Article 24 Prohibition of employment of children in factories and Child Labour (Prohibition & Regulation) Act 1986, where the engagement of children up to 14 years is prohibited.</p> <p>The minimum age for employment is 14 years, and we do not employ workers below the age of 18. We have a Graduate Apprentice Program for Engineering undergraduates. During a period of 12 months, students work in a different functional area and are trained on-the-job.</p> <p>Applications are checked and scrutinized including their academic results and proof of graduation is required. Successful candidates are issued an appointment letter communicating the details of training, subsequent employment and are issued an employment contract.</p> <p>Employee records are kept which includes their date of birth as with other information such as their tax file number.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • What is the statutory, legal, or regulated minimum age at the place of your operations? • What measures have you taken to ensure that child labour is not used in your operations? • Do you register the age (birthday) of your workers and how do you verify that this is the actual age? Do you check the identification papers? • If you employ workers below the age of 18, describe what measures you have taken to ensure that they don't perform hazardous or heavy work. If there are requirements for training and education, indicate supporting documents.

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7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal daytime working hours.

7.2.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.

7.2.4 The organization shall prohibit the worst forms of child labour

CHILD LABOUR iv



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.2.</p>	<p>Subcontractors (1, India & 1, Germany):</p> <p>FSC outsourcing agreements are signed by each of our non-FSC certified contractors stating they shall conform to all applicable certification requirements which includes the FSC core labour requirements.</p> <p>We have informed all our subcontractors about the FSC core labour requirements and send them a copy of our policy statements.</p> <p>We send to all our subcontractor's a short questionnaire to complete regarding their conformity to the FSC core labour requirements where we ask them for supporting documents such as a Code of Conduct.</p> <p>We perform regular audits with our subcontractors and one of the items we now check is conformity to FSC core labour requirements.</p> <p>This is applied to all the FSC Core Labour Requirements within the self-assessment.</p>

13.2 Activities that are subject to outsourcing agreements are those that are included in the scope of the organization's CoC certificate, such as purchase, processing, storage, labelling and invoicing of products.

13.4 The organization shall establish an outsourcing agreement with each non-FSC certified contractor, specifying at a minimum that the contractor shall:

- a) conform to all applicable certification requirements and the organization's procedures related to the outsourced activity;...

7.2 The organization shall not use child labour.

7.2.1 The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.

7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal daytime working hours.

7.2.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.

7.2.4 The organization shall prohibit the worst forms of child labour

CHILD LABOUR v



Questions	Answer
<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.2.</p>	<p>Germany (located within the Human Resources department):</p> <ul style="list-style-type: none"> • Procedure and policy on how we hire apprentices, copies of applicant school reports, and certificates. • Student training contracts • Employment hiring procedure and employee records which include the date of birth and tax file number) • Policy statement on our human rights strategy • Risk management analysis and monitoring reports <p>India (located within the Human Resources department):</p> <ul style="list-style-type: none"> • Employment hiring procedure and employee records which include the date of birth and tax file number) • Procedure and policy on our we hire graduates, copies of applications for the graduate program. • Appointments letters and graduate contracts
<p>e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.2. Please describe them, and how they impact your ability to comply with Clause 7.2.</p>	<p>Germany: None</p> <p>India: None</p>
<p>f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.2.</p>	<p>Please see our policy statement regarding child labour on our websites:</p> <p>www.companyabc.de/workersrights</p> <p>www.companyabc.in/workersrights</p>

ENCUESTA 1

¿Con qué frecuencia debo realizar la autoevaluación?

- Cada mes
- Por lo menos una vez al año como parte de cada evaluación de vigilancia
- Por lo menos una vez durante la evaluación de vigilancia de mi certificado

POLL 1

How often do I need to complete the self-assessment?

- Every month
- At least annually as part of each surveillance audit
- At least once for the duration of my certificate validity



FORCED & COMPULSORY LABOUR i



Questions	Answer
a) Does your organization comply with Clause 7.3? If yes, continue at c).	Yes.
b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.3.	N/A
c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.3.	<p>All sites: We advertised all job openings (internal and external) with detailed role descriptions. All employees have a copy of their employment contracts both in German and English or Hindi, and all the terms of employment outlined at the time of recruitment are explained to all new employees through our onboarding activities.</p> <p>All employees are free to resign from their employment at any time without penalty, by giving reasonable notice according to the terms of their employment contract of (X) months.</p> <p>We do not grant loans or wage advances or request fees or payments to commence employment. This is not part of our company policy.</p> <p>We keep records of all our employees, their contracts including all payments of wages, statutory deductions (tax, social security etc.)</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> Describe your recruitment and contracting practices to show compliance with this principle. Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case? How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment? How do you ensure that the workers do not experience any form of mobility restriction?

7.3 The organization shall eliminate all forms of forced and compulsory labour.

7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.

7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:

- physical and sexual violence
- bonded labour
- withholding of wages /including payment of employment fees and or payment of deposit to commence employment
- restriction of mobility/movement
- retention of passport and identity documents
- threats of denunciation to the authorities.

FORCED & COMPULSORY LABOUR ii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.3.</p>	<p>German sites: Germany has ratified the ILO conventions on forced Labour Convention, 1930 (No. 29) and Abolition of Forced Labour Convention, 1957 (No. 105). The German Criminal Code (StGB) includes § 232b StGB Forced Labour, § 233 StGB Labour Exploitation and § 233a StGB Exploitation Taking Advantage of the Deprivation of Liberty.</p> <p>The Supply Chain Due Diligence Act have a reporting obligation to the German Federal Office of Economics and Export Control (BAFA) on the actual and potential negative impact of our business activities on human rights. Failure to comply we potentially risk fines. This comes into force in 2024 however we have started the preparation for these requirements.</p> <p>We identify risks within our own company, our supply chains through our direct suppliers, and take preventive measures. For example, through appropriate agreements with our subcontractors which include the core labour requirements on forced and compulsory labour.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Describe your recruitment and contracting practices to show compliance with this principle. • Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case? • How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment? • How do you ensure that the workers do not experience any form of mobility restriction?

- 7.3 The organization shall eliminate all forms of forced and compulsory labour.
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- physical and sexual violence
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 - restriction of mobility/movement
 - retention of passport and identity documents
 - threats of denunciation to the authorities.

FORCED & COMPULSORY LABOUR iii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.3.</p>	<p>German site: As an employer, we are required by the Documentary Evidence Act (Nachweisgesetz) to lay the terms and conditions of the employment relationship no later than one month after the commencement of employment. It is a statutory obligation that the employment contract should have:</p> <ul style="list-style-type: none"> • name and address of the employer and the employee; • information on the starting date; • duration (only in case of fixed-term contracts); • the place of work; • the nature of the activity involved; • composition and amount of the remuneration; the working hours; • the duration of annual leave; • the notice period; and • a general reference to the collective bargaining agreements, works or service agreements applicable to the employment relationship.

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Describe your recruitment and contracting practices to show compliance with this principle. • Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case? • How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment? • How do you ensure that the workers do not experience any form of mobility restriction?

7.3 The organization shall eliminate all forms of forced and compulsory labour.

7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.

7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:

- physical and sexual violence
- bonded labour
- withholding of wages /including payment of employment fees and or payment of deposit to commence employment
- restriction of mobility/movement
- retention of passport and identity documents
- threats of denunciation to the authorities.

FORCED & COMPULSORY LABOUR iv



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.3.</p>	<p>India sites:</p> <p>India has ratified the Forced Labour Convention (No. 29) and Abolition of Forced Labour Convention (No.105). The two conventions and following laws are enforced by the National Human Rights Commission in India. These are the Bonded Labour System (Abolition) Act, 1976, Contract Labour Act, 1970, the Inter-State Migrant Workmen Act, and the Minimum Wages Act.</p> <p>We are obligated as an employer under the Shop and Establishment Act to specify and communicate in writing certain terms and conditions of employment to our employees. This includes job responsibility and place of work, probation period, working hours, leave entitlement, salary and other statutory benefit entitlement, etc. This is all included within our employment agreements.</p> <p>We are liable as an employer under the Employees' Provident Funds and Miscellaneous Provisions Act, 1952 to deduct and deposit both employer and employee contributions to the fund, This must be filed with the Employee Provident Fund Organization and we retain these records.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Describe your recruitment and contracting practices to show compliance with this principle. • Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case? • How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment? • How do you ensure that the workers do not experience any form of mobility restriction?

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7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.

7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:

- physical and sexual violence
- bonded labour
- withholding of wages /including payment of employment fees and or payment of deposit to commence employment
- restriction of mobility/movement
- retention of passport and identity documents
- threats of denunciation to the authorities.

FORCED & COMPULSORY LABOUR v



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.3.</p>	<p>India site: We follow the Wages Act that mandates that wages must be paid without deductions of any kind except certain authorized deductions, such as taxes on income, fines, or deductions owing to absence from duty. All employees' salaries and deductions according to the law are recorded within our payroll records and our employees' pay statements. For casual or contract workers (who work for a specific period and carry out a specific task only) who are provided through contractors. We are obligated under the Contract Labour (Regulation and Abolition) Act to:</p> <ul style="list-style-type: none"> • Register the establishment where we hire contractual workers with the authorities. • Hire workers only from licensed contractors. • Maintain a register of contractors, a register to record the work performed, wages paid, receipts etc. • Post up notices showing the place and time of disbursement of wages, rate of wages, hours of work, wage period, dates of payment of wages, and date of payment of unpaid wages. • Display notices in a language understood by most of the contract labourers and workers.

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Describe your recruitment and contracting practices to show compliance with this principle. • Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case? • How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment? • How do you ensure that the workers do not experience any form of mobility restriction?

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7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:

- physical and sexual violence
- bonded labour
- withholding of wages /including payment of employment fees and or payment of deposit to commence employment
- restriction of mobility/movement
- retention of passport and identity documents
- threats of denunciation to the authorities.

FORCED & COMPULSORY LABOUR vi

Questions	Answer
<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.3.</p>	<p>Germany sites:</p> <p><i>Located within Human resources department:</i></p> <ul style="list-style-type: none"> • Human resources procedure • Job opening templates • Records of all application forms • Records of employment contracts signed by all employees • Employee records <p><i>Located within Payroll/Finance department:</i></p> <ul style="list-style-type: none"> • Payroll records • Records of mandatory payroll deductions (e.g., tax, social security or insurance, health insurance) for each employee <p><i>Located within our Legal department:</i></p> <ul style="list-style-type: none"> • Outsourcing agreements with subcontractors <p>India sites:</p> <p><i>Located within Human resources department:</i></p> <ul style="list-style-type: none"> • Human resources procedure • Job opening templates • Records of all application forms • Employee records & employment contracts signed by all employees including the register of contractual workers • Copies of notices posted for contractual workers • Records of filings to the Employee Provident Fund Organization <p><i>Located within Payroll/Finance department:</i></p> <ul style="list-style-type: none"> • Payroll records • Records of mandatory payroll deductions (e.g., tax, social security or insurance, health insurance) for each employee <p><i>Located within our Legal department:</i></p> <ul style="list-style-type: none"> • Outsourcing agreements with subcontractors

FORCED AND COMPULSORY LABOUR vii



Questions	Answer
e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.3. Please describe them, and how they impact your ability to comply with Clause 7.3.	Germany: None India: None
f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.3.	Please see our policy statement regarding forced and compulsory labour on our websites: www.companyabc.de/workersrights www.companyabc.in/workersrights

ENCUESTA 2

¿Verdadero o falso? La autoevaluación debe ir acompañada de la(s) declaración(es) de política(s).

- Verdadero
- Falso

POLL 2

True or false? The self-assessment should be accompanied by the policy statement(s).

- True
- False



DISCRIMINATION IN EMPLOYMENT & OCCUPATION i



Questions	Answer
a) Does your organization comply with Clause 7.4? If yes, continue at c).	Yes.
b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.4.	N/A
c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.4.	<p>For all sites: We document each application process and store it for at least three months from receipt to the rejection of the applicant. We have detailed and objective selection criteria for applicants. We use a fixed questionnaire during interviews, and additional questions tailored for the position. Questions concerning pregnancy, age, race/ethnic origin, sexual identity, religion, trade union affiliation or severe disability are not allowed within company policy and human resources operating procedures in all sites of our certificate.</p> <p>We send out neutrally formulated rejection letters, we base the rejection of an applicant on an objective hiring criteria, such as the job profile and required qualifications.</p> <p>All application forms and employee records do not contain information about marital status or religion or other personal information that could lead to discrimination.</p>

- PROMPTING QUESTIONS**
- How do you ensure that wages and other working conditions are non-discriminatory?
 - Is there gender/age ratio parity?
 - Do you have an ethnically diverse workforce?
 - Do you have policies about non-discrimination?
 - Do you ensure all employees have equal opportunity for promotion?
 - How do you ensure applicants have equal opportunity for employment?
 - If there are legal or regulatory restriction which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

DISCRIMINATION IN EMPLOYMENT & OCCUPATION ii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.4.</p>	<p>For all sites: We are an equal opportunity employer and have a policy about non-discrimination. We provide equal opportunity training for management and employees which includes an alternative dispute resolution program. We have a special program to encourage more women from STEM to apply for open positions.</p> <p>We have clear policies covering a wide range of relevant workplace issues. These include probation periods, conduct in the workplace, workplace safety, sexual harassment, dress requirements, use of email, use of employer's property, and attendance/timekeeping termination procedures.</p> <p>We have a salary range system to pay employees consistently for the work they do in a given position. The range usually allows for differences in education, experience, tenure or performance. Employees in the same type of job know their salary is relatively similar to other colleagues.</p> <p>Promotions and salary increases are based on appraisal criteria through performance assessments. We actively analyze the makeup of our organization to inform our recruitment and hiring strategy (i.e., gender parity within management roles and heads of departments).</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • How do you ensure that wages and other working conditions are non-discriminatory? • Is there gender/age ratio parity? • Do you have an ethnically diverse workforce? • Do you have policies about non-discrimination? • Do you ensure all employees have equal opportunity for promotion? • How do you ensure applicants have equal opportunity for employment? • If there are legal or regulatory restrictions which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

DISCRIMINATION IN EMPLOYMENT & OCCUPATION iii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.4.</p>	<p>German sites: Germany has ratified the ILO Conventions on Equal Remuneration 1951 (No. 100) and Discrimination (Employment and Occupation) 1958 (No. 111). Constitutionally and legislatively, all employees and employers are covered by Article. 3 of the German Basic Law (Grundgesetz; GG) and the General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz; AGG) , and the Act on the Protection against Unfair Dismissal (Kündigungsschutzgesetz).</p> <p>We follow the constitution and legal acts that protect against discrimination about access to employment, self-employment, and promotion. We keep documents and records to demonstrate and prove our selection process should we be called in for claims for damages due to discrimination by the authorities.</p> <p>All recruitments are reviewed and approved by our in-house works council according to the statutory requirements for non-discrimination. The chair of the works council is Elisabeth Mueller (E.mueller@companyabc.de). Any employee who feels discriminated against can register their grievances with the company's works council for further investigation and resolution.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • How do you ensure that wages and other working conditions are non-discriminatory? • Is there gender/age ratio parity? • Do you have an ethnically diverse workforce? • Do you have policies about non-discrimination? • Do you ensure all employees have equal opportunity for promotion? • How do you ensure applicants have equal opportunity for employment? • If there are legal or regulatory restrictions which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

DISCRIMINATION IN EMPLOYMENT & OCCUPATION iv



Questions	Answer
c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.4.	<p>German sites: As part of German gender regulations, our job advertisements are listed with m/w/d to make clear we consider all applicants who identify as gender diverse or non-binary and that our positions are open to all genders. We use generic and/or gender-neutral job titles.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • How do you ensure that wages and other working conditions are non-discriminatory? • Is there gender/age ratio parity? • Do you have an ethnically diverse workforce? • Do you have policies about non-discrimination? • Do you ensure all employees have equal opportunity for promotion? • How do you ensure applicants have equal opportunity for employment? • If there are legal or regulatory restrictions which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

DISCRIMINATION IN EMPLOYMENT & OCCUPATION v



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.4.</p>	<p>India sites: India has ratified the Equal Remuneration Convention (No.100) and Discrimination (Employment Occupation) Convention (No.111). Articles 14, 15, 15(3), 16 and the constitution includes provisions related to gender equality, prohibition of discrimination based on sex, special provisions for women and children (scope for affirmative action for women), and equal opportunity in matters of public employment.</p> <p>The 'Equal Remuneration Act 1976' covers discrimination with remuneration on the grounds of gender at the time of recruitment or during employment. We adhere to the company salary scales to provide for the payment of equal remuneration for men and women but based on roles and tenure.</p> <p>In addition, we are obligated by the Act to maintain registers and other documents in relation to all employees that contain detailed information regarding their remuneration. We are checked by government inspectors for compliance with the provision of this Act, failure to comply we risk fines or imprisonment.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • How do you ensure that wages and other working conditions are non-discriminatory? • Is there gender/age ratio parity? • Do you have an ethnically diverse workforce? • Do you have policies about non-discrimination? • Do you ensure all employees have equal opportunity for promotion? • How do you ensure applicants have equal opportunity for employment? • If there are legal or regulatory restrictions which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

JM2

Slide 26

JM2

I changed this to read "legal or regulatory restrictionS" just fyi in case the original copy can be amended

Jannicka Murphy, 20/08/2021

DISCRIMINATION IN EMPLOYMENT & OCCUPATION vi



Questions	Answer
<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.4.</p>	<p>Germany <i>Located within Human Resources department:</i></p> <ul style="list-style-type: none"> • Human resources policies and procedures • Job advertisements, questionnaires, selection criteria templates • Job application forms and employee records • Performance assessments procedure and appraisal criteria • Salary scales/range • Equal opportunity and non-discrimination policy • Women in STEM program • Analysis of workforce • EEO training program • Hiring and recruitment strategy • Complaint procedure and records <p><i>Located within the Marketing department:</i></p> <ul style="list-style-type: none"> • Annual Corporate Social responsibility report <p>India <i>Located within Human Resources department:</i></p> <ul style="list-style-type: none"> • Human resources policies and procedure • Job advertisements, questionnaires, selection criteria templates • Job application forms and employee records • Performance assessments procedure and appraisal criteria • Salary scales/range • Equal opportunity and non-discrimination policy • Women in STEM program • Analysis of workforce • EEO training program • Hiring and recruitment strategy • Complaint procedure and records • Hiring and recruitment strategy • Statutory reporting register • Advisory Committee documents and records (meeting minutes and agenda) <p><i>Located within the Marketing department:</i></p> <ul style="list-style-type: none"> • Annual Corporate Social responsibility report

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

DISCRIMINATION IN EMPLOYMENT & OCCUPATION vii



Questions	Answer
e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.4. Please describe them, and how they impact your ability to comply with Clause 7.4.	<p>Germany: None</p> <p>India: None</p>
f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.4.	<p>Please see our policy statement regarding discrimination in employment and occupation on our websites:</p> <p>www.companyabc.de/workersrights</p> <p>www.companyabc.in/workersrights</p>

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

ENCUESTA 3

¿Qué documentos y registros podrían utilizarse para demostrar la conformidad de la libertad de asociación y el derecho efectivo a la negociación colectiva?

- Acuerdos colectivos de negociación, actas o documentos de las reuniones con los sindicatos y el comité de empresa, o registros de las elecciones de los representantes de los trabajadores
- Acuerdos colectivos de negociación, vales de regalo o registros de las elecciones de los representantes de los trabajadores
- Acuerdos colectivos de negociación, actas o documentos de las reuniones con los sindicatos y el comité de empresa, o registros de las deducciones legales.

POLL 3

What documents and records could be used to demonstrate conformity freedom of association and the effective right to collective bargaining requirements?

- Collective bargaining agreements, minutes or documents from meetings with trade unions and works council, or records of the workers' representative(s) elections
- Collective bargaining agreements, gift vouchers, or records of the workers' representative(s) elections
- Collective bargaining agreements, minutes or documents from meetings with trade unions and works council, or tax file numbers.



FREEDOM OF ASSOCIATION & THE RIGHT TO COLLECTIVE BARGAINING



Questions	Answer
a) Does your organization comply with Clause 7.5? If yes, continue at c).	Yes
b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.5.	N/A
c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.5.	<p>All sites: The majority (approx. 80% within both countries) of employees have trade union membership, we uphold and respect the collective bargaining agreement. The collective agreement entitlements refer to salary, allowances for overtime, and for working on public holidays. Other financial entitlements are included are severance payment and Christmas/ Diwali bonus.</p> <p>Employees and managers work together to ensure that the collective bargaining agreements are applied, and related meetings are documented. Managers make sure that workers are paid the agreed rates and that working conditions are implemented as specified in the latest agreement.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Are workers organised into a trade union? To the best of your knowledge, describe why you believe the workers have or have not chosen to be represented by a trade union. • If workers are represented by a union, is the union autonomous and independent? • What forms of worker representation other than unions exist at the site? • Are there collective bargaining agreements in place that cover workers, and if so, how do you ensure compliance with such agreements?

7.5 The organization shall respect freedom of association and the effective right to collective bargaining.

7.5.1 Workers are able to establish or join worker organizations of their own choosing.

7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.

7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.

7.5.5 Collective bargaining agreements are implemented where they exist.

FREEDOM OF ASSOCIATION & THE RIGHT TO COLLECTIVE BARGAINING ii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.5.</p>	<p>All sites: Trade union officers regularly communicate with employees, explaining what has been agreed and discussing how to approach the implementation of any changes. Trade union representatives have free access to their members.</p> <p>We recognize trade unions and engage with them at multiple levels as regulated by the law, the union have identified the office bearers which we liaise directly with.</p> <p>Managers and trade union representatives will monitor the application of the agreement and work together to resolve any problems that arise, minutes are documented from these meetings.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Are workers organised into a trade union? To the best of your knowledge, describe why you believe the workers have or have not chosen to be represented by a trade union. • If workers are represented by a union, is the union autonomous and independent? • What forms of worker representation other than unions exist at the site? • Are there collective bargaining agreements in place that cover workers, and if so, how do you ensure compliance with such agreements?

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7.5.1 Workers are able to establish or join worker organizations of their own choosing.

7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.

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7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.

7.5.5 Collective bargaining agreements are implemented where they exist.

FREEDOM OF ASSOCIATION & THE RIGHT TO COLLECTIVE BARGAINING iii



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.5.</p>	<p>German sites: Germany has ratified the ILO Conventions of Freedom of Association and the Protection of the Right to Organize 1948 (No. 87) and the Right to Organize and Collective Bargaining Convention 1949 (No. 98). The right of association of both workers and employers is guaranteed as a basic right within the German Basic Law (Art. 9 para. 3).</p> <p>There is an active works council (Betriebsräte). The work council monitors whether the employer is complying with the applicable laws, occupational safety and health provisions, collective agreements and organizational-level agreements.</p> <p>The members of the works council are elected democratically by employees, using a specified electoral process. The chairperson of the works council is Elisabeth Mueller (e.mueller@companyabc.de)</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Are workers organised into a trade union? To the best of your knowledge, describe why you believe the workers have or have not chosen to be represented by a trade union. • If workers are represented by a union, is the union autonomous and independent? • What forms of worker representation other than unions exist at the site? • Are there collective bargaining agreements in place that cover workers, and if so, how do you ensure compliance with such agreements?

- 7.5 The organization shall respect freedom of association and the effective right to collective bargaining.
- 7.5.1 Workers are able to establish or join worker organizations of their own choosing.
- 7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.
- 7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.
- 7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.
- 7.5.5 Collective bargaining agreements are implemented where they exist.

FREEDOM OF ASSOCIATION & THE RIGHT TO COLLECTIVE BARGAINING iv



Questions	Answer
<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.5.</p>	<p>India site:</p> <p>The right to freedom of association is included in the constitution and guaranteed under the Trade Union Act. India has not ratified the ILO Conventions Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) and the Right to Organize and Collective Bargaining Convention, 1949 (No. 98).</p> <p>The company has a works committee comprising of equal representation of workers and employers' representatives. The purpose of this committee is to settle and discuss work-related issues and issues related to the conditions of employment with the support of the trade union. We have an active trade union, they hold worker's representatives' elections independently, the current representatives are:</p> <ul style="list-style-type: none"> • Sunita Devi • Sanjeewani Reddy • Anushree Gupta <p>We have three active trade unions that is affiliated with INTUC, BMS and CITU unions.</p>

PROMPTING QUESTIONS
<ul style="list-style-type: none"> • Are workers organised into a trade union? To the best of your knowledge, describe why you believe the workers have or have not chosen to be represented by a trade union. • If workers are represented by a union, is the union autonomous and independent? • What forms of worker representation other than unions exist at the site? • Are there collective bargaining agreements in place that cover workers, and if so, how do you ensure compliance with such agreements?

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7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.

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7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.

7.5.5 Collective bargaining agreements are implemented where they exist.

FREEDOM OF ASSOCIATION & THE RIGHT TO COLLECTIVE BARGAINING v



Questions	Answer
<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.5.</p>	<p>Germany <i>Located within Human Resources Department:</i></p> <ul style="list-style-type: none"> • Collective bargaining agreements • Minutes or documents from meetings with trade unions and works council • Freedom of association statements within our policies <p>India <i>Located within Human Resources Department:</i></p> <ul style="list-style-type: none"> • Collective bargaining agreements • Minutes or documents from meetings related with trade union • Freedom of association statements within our policies <p><i>Located with Works committee:</i></p> <ul style="list-style-type: none"> • Meeting agenda and minutes • Records of worker representative elections

7.5 The organization shall respect freedom of association and the effective right to collective bargaining.

7.5.1 Workers are able to establish or join worker organizations of their own choosing.

7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.

7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.

7.5.5 Collective bargaining agreements are implemented where they exist.

FREEDOM OF ASSOCIATION & THE RIGHT TO COLLECTIVE BARGAINING vi



Questions	Answer
e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.2. Please describe them, and how they impact your ability to comply with Clause 7.5.	<p>Germany: None</p> <p>India: None</p>
f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.5.	<p>Please see our policy statement regarding freedom of association on our websites:</p> <p>www.companyabc.de/workersrights</p> <p>www.companyabc.in/workersright</p>

7.5 The organization shall respect freedom of association and the effective right to collective bargaining.

7.5.1 Workers are able to establish or join worker organizations of their own choosing.

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7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.

7.5.5 Collective bargaining agreements are implemented where they exist.

ENCUESTA 4

Debe presentar su autoevaluación:

- Después de su evaluación de vigilancia
- Durante la evaluación de vigilancia
- Antes de la evaluación de vigilancia

POLL 4

You should submit your self-assessment:

- After your surveillance audit
- During your surveillance audit
- Before your surveillance audit



CORE LABOUR REQUIREMENTS RESOURCES



WEBINARS:

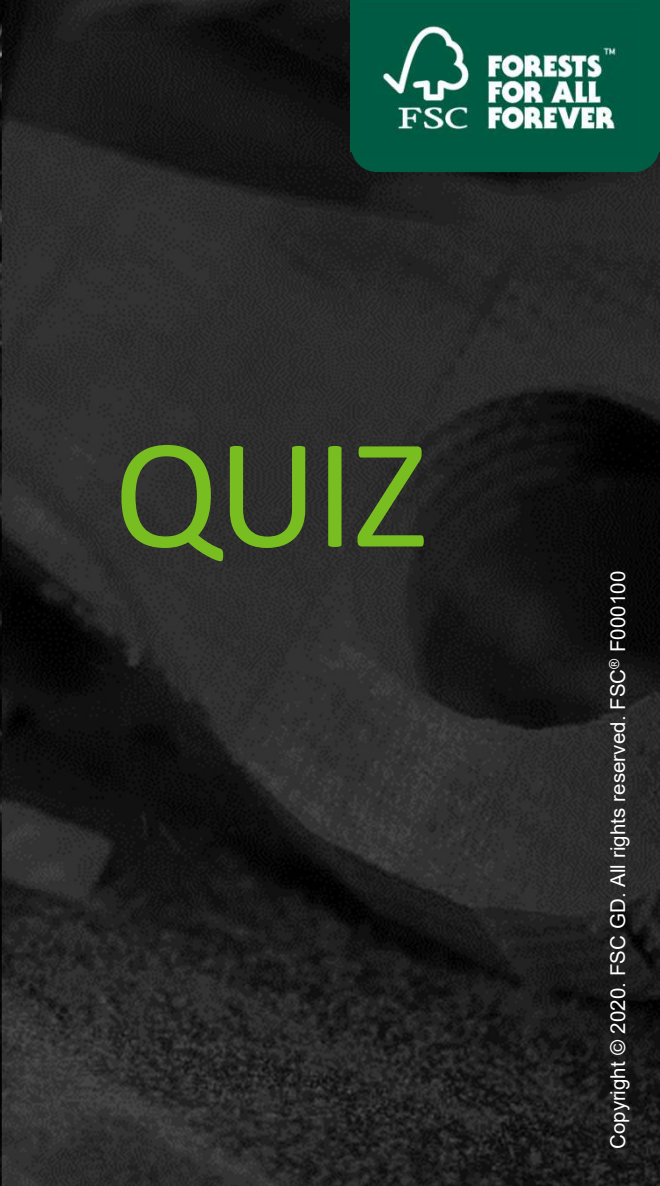
- Introduction
- First technical
- Second technical*

MATERIALS:

- Q&A
- Guidance document*
- National self-assessment templates*

TRAINING:

- E-training



QUIZ

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