

## **EUROVISION SERVICES**

**Child Labour Policy** 



Ethics & Compliance

#### **Eurovision Services S.A.**



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## **Our Commitment**

#### **UPHOLDING ETHICS & HUMAN RIGHTS**

Our success depends on the highest standards of professionalism, both in our external dealings and in how we conduct ourselves in relation to other individuals. Ethics and transparency are a corporate responsibility and have a profound influence on the way companies conduct their business affairs.

As underlined by our Code of Ethics and Business Conduct, Eurovision Services is committed to respecting and promoting the fundamental rights set forth in the Universal Declaration of Human Rights, the dignity and value of human beings and equal rights for women and men and strongly objects to any violation of human dignity and in particular all forms of forced or compulsory labour related to children ("Child Labour").

Several decades of concerted efforts to combat child labour have led to an impressive reduction in absolute numbers of child labourers. Nevertheless, as of 2012, there were still an estimated 168 million child labourers, including over 85 million children in hazardous work – one of the worst forms of child labour that pose the greatest risks to children's mental and physical health. Worldwide, approximately one in every 10 children is involved in Child Labour, and in Sub-Saharan Africa it is one in five.

The UN Guiding Principles on Business and Human Rights (UNGPs), adopted unanimously in 2011<sup>1</sup> by the UN Human Rights Council, address the government duty to protect individuals from violations of human rights and also provide a blueprint for employers to develop robust management systems for due diligence in relation to human rights and Child Labour.

The goal of this Child Labour policy (the "**Policy**") is to describe our position on employing minors and aims to ensure that our company and all our subsidiaries and everyone we are connected with follow the law and cares for children's interests.



Any suspicion of Child Labour must be reported immediately through the appropriate channels: <a href="https://eurovisionservices.integrityline.io/">https://eurovisionservices.integrityline.io/</a>,or <a href="mailto:https://eurovisionservices.com">hrhotline@eurovisionservices.com</a> or <a href="mailto:compliance@eurovisionservices.com">compliance@eurovisionservices.com</a>.

<sup>1</sup> UNGPs



## Legal Framework

A child means every human being below the age of eighteen (18) years.

#### WHAT IS CHILD LABOUR?

Our definition of child labour is based on conventions and recommendations on child labour:

- by the International Labour Organisation (**ILO**) Conventions No. 138 <sup>2</sup> (1973) and No.182<sup>3</sup> on Worst Forms of Child Labour (1999) and the ILO-IOE Child Labour Guidance Tool for Business of 15 December 2015<sup>4</sup>; and
- the OECD Due Diligence Guidance for Responsible Business of 30 May 2018<sup>5</sup>;
- the UN Guiding Principles on Business and Human Rights<sup>6</sup>;
- by the ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour dated 3 December 2021 adopted by The Swiss federal Council (**DDTrO**)<sup>7</sup> which aims to regulate the responsible sourcing of minerals and metals to ensure that these materials are not associated with conflict regions or child labour.

Child Labour refers to work that:

- ) is mentally, physically, socially or morally dangerous and harmful to children; and
- ) interferes with their schooling by:
  - depriving them of the opportunity to attend school;
  - obliging them to leave school prematurely; or
  - requiring them to attempt to combine school attendance with excessively long and heavy work.

Not all work performed by children is Child Labour.

Millions of young people above the relevant minimum age undertake work, paid or unpaid, that is lawful, appropriate for their age and maturity and part of their socialisation and school to work transition. By working, these young people learn to take responsibility, gain skills, add to their family's or their own income and wellbeing, and contribute to their country's economy.

The following terms are important to understand when child work becomes Child Labour:

**Light work:** this is work that children can do as long as it does not threaten their health and safety, or hinder their education or vocational training (generally, non-hazardous work for fewer than 14 hours per week). It should only be performed by children aged 13 or over (or, provisionally, age 12 in certain developing countries) when permitted by local law.

<sup>3</sup> C182 ILO

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<sup>&</sup>lt;sup>2</sup> C138 ILO

<sup>&</sup>lt;sup>4</sup> ILO-IOE Child Labour Guidance Tool for Business

<sup>&</sup>lt;sup>5</sup> OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct

<sup>&</sup>lt;sup>6</sup> U.N Convention on the Rights of the Child

<sup>&</sup>lt;sup>7</sup> DDTro



- **) Basic minimum age:** The minimum age for work should not be below the age for finishing compulsory schooling, and in all cases not lower than 15 years of age (or, provisionally, age 14 in certain developing countries). Some countries set the minimum age at 16.8
- **Hazardous work:** One of the worst forms of Child Labour, this is work that is inherently dangerous, such as working with pesticides or underground, or carried out under conditions that are particularly risky for children, such as work for excessively long hours or in high temperatures. It should not be performed by people under 18 (19 in Switzerland Minimum age needs to be checked for each country 9).
- Other worst forms of child labour: These comprise slavery, trafficking, debt bondage and other forms of forced labour, including forced recruitment for use in armed conflict, the use of children in prostitution and pornography, and in illicit activities such as organised begging or the trafficking or sale of narcotics. Children should never be involved in such activities.

### **Our Position**

#### YOUNG CHILDREN

EUROVISION strictly prohibits the work of children below the age of 16 to be employed in factories producing the equipment purchased by EUROVISION to provide its services to its customers. If the law mandates a higher minimum age, it must be followed.

Young workers below the age of 18 can only undertake light work, and all laws regarding young workers must be adhered to.

The use of Child Labour is not acceptable, and EUROVISION will not work with suppliers that use child labour in any of their facilities, or who do not have efficient systems in place to ensure that child labour cannot occur on the production premises.

#### PARENTAL EMPLOYMENT

Eurovision may occasionally conduct business with family-owned enterprises. These businesses are typically permitted to employ the owner's young children provided that the work is not hazardous. Eurovision complies with this regulation but will terminate the related contract if it becomes evident that these children are exposed to danger or are consistently working during school hours.



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<sup>&</sup>lt;sup>8</sup> Minimum

<sup>&</sup>lt;sup>9</sup> Minimum



#### OCCASIONAL WORK

Sometimes, parents or schools bring children to work and/or visit the office to teach them skills and introduce them to a work environment. (i.e. schools' days in the office). This practice is acceptable as long as it does not consistently interfere with school attendance or place the children in any danger.

#### OLDER CHILDREN

For children older than 16, local and international laws will be followed. Generally, these children can work, but they should not engage in activities that put at risk their health and safety or interfere with their education and development.

## Actions & Implementation

What are the different actions taken by EUROVISION to enforce this Policy and help eliminate Child Labour?

- 1. **Corporate responsibility:** the Senior Leadership Team has approved this Policy and is committed to enforcing it and assessing it.
- Dissemination: Eurovision is making a public commitment to respect human rights including children's right to be free from child labour by publishing this Policy on its website.
- 3. **Internal alignment**: all relevant operational policies and procedures will be aligned with this commitment.
- 4. **Educating Employees**: on youth work laws and invite them to report Child Labour if they see or suspect it on the whistleblowing platform.
- 5. **Documentation checking:** keeping and validating documentation, verifying the Employees' age after they are hired. If a minor under the age of 18 has been hired, local applicable laws will be reviewed and adjustment of working hours accordingly if needed.
- 6. **Application to business relationships**: All our suppliers will have to commit to the below which is part of the Supplier Ethics Charter and in case of breach or suspicion, the contract will be suspended or terminated.

#### **EACH SUPPLIER MUST COMMIT TO:**

- ✓ respect and implementation the <u>UN Guiding Principles on Business and Human</u>
  <u>Rights</u> and the <u>Children's Rights and Business Principles</u>
- ✓ the adoption of a hiring policy that includes a minimum age of 16 (or older if specified by the applicable local law);
- √ have efficient management systems to ensure age verification
- ✓ that only persons over the age of 16 are present in the workplace (including during school holidays when risk of children being present in the factories may be higher)
- ✓ that in factories where childcare facilities are provided, children be restricted to these
  areas only and are prohibited from the work area

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- ✓ that legally defined light-work requirements for young workers employed in the factory are respected
- ensure that any sub-suppliers and sub-contractors are not involved in employment of Child Labour and that they respect legally defined light-work requirements for young workers.

# Corporate Responsibility & Risk Assessment

The Senior Leadership Team of Eurovision Services, together with each legal representative and director of the different entities, has approved this Policy and is committed to enforcing it and assessing it.

#### RISK MAPPING

Under the <u>UN Guiding Principles on Business and Human Rights</u> and the <u>Children's Rights and Business Principles</u>, businesses have a responsibility to identify, assess, and address relevant human rights risks, including risks to children's rights. To carry out this risk assessment, EUROVISION will perform a risk mapping to identify and assess any actual or potential adverse impact on children's rights amongst its suppliers.

#### **DUE DILIGENCE**

As part of its internal due diligence process, EUROVISION is performing compliance checks on its suppliers which includes human rights due diligence process such as:

- assessing impacts, including risks of Child Labour;
- integrating the results into actions and decisions; and
- tracking performance; and
- being prepared to communicate about performance,

Eurovision will define appropriate measures in light of the results of the assessment carried out (entry into or continuation of a business relationship, implementation of an action plan, suspension or termination of a business relationship). In relation to Human rights, remediation processes will include operational-level grievance mechanisms via the <a href="whistleblowing system">whistleblowing system</a> or via <a href="https://hrthotline@eurovisionservices.com">hrthotline@eurovisionservices.com</a>.