

## **ANTI-SLAVERY / ANTI-CHILD LABOUR / ANTI-HUMAN TRAFFICKING POLICY**

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0	August 2021	Nembrini C.	Pellegrini F.

## 1 PREAMBLE

The protection of human rights and fundamental freedoms is a top priority for FG VALVOLE and is codified and enforced through the company's own Code of Ethics: *PRO Ethic Procedure Rev.1*. FG VALVOLE will therefore not tolerate any form of slavery, child labour and human trafficking.

## 2 ANTI-SLAVERY

### 2.1 INTROUCTION

The modern world accepts that slavery is a great evil and there are many international documents that denounce it and make it illegal.

**Slavery in international law** is governed by a number of treaties, conventions and declarations. Foremost among these is the *Universal Declaration on Human Rights* (1948) that states in Article 4: "no one should be held in slavery or servitude, slavery in all of its forms should be eliminated."

Slavery, slave-related practices, and forced labour are now regarded as:

- A common international crime when committed against any person.
- A 'crime against humanity' when committed by public officials.
- A 'war-crime' when committed by a nation at war against the citizens of its opponents.

### 2.2 COMPANY ROLE

The company, all employees and members have a responsibility to ensure all colleagues and Business Partners are safeguarded, treated fairly and with dignity. The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically, transparently and with integrity in all our business dealings and relationships and to implementing and enforcing

effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 3 ANTI-CHILD LABOUR

### 3.1 INTRODUCTION

According to International Labour Organisation (ILO), Child Labour represents hazardous forms of work that disrupt the healthy development of a child. Child labour can limit or damage the physical, mental, social or psychological development of children and undermine a child's right to childhood, development and education

### 3.2 COMPANY ROLE

Efforts to Reduce the Engagement of Child Labour:

- Comply with national law on child labour and minimum age.
- Comply with the Convention on the Rights of the Child.
- Not use or support the use of child labour as defined in ILO Convention 138.
- Prohibit and seek to eliminate the worst forms of child labour in accordance with ILO Convention 182.
- Not work with those who use child labour – unless an elimination plan is in place.
- Base decisions about child labour on expert advice about the options available to children in the local context, and the best interests of the children affected
- Educate employees and all staff on child labour and its negative impacts in the work environment and on society as a whole.

Responsibilities:

- All of our leaders are accountable to monitor the effectiveness of these expectations and to provide visible leadership for this Policy.
- It will be disseminated publicly, using best local means, including translation to local language, where necessary, and will be reflected in operational policies and procedures, and supplier contracts, as appropriate. If anything in this Policy is in conflict with local statutes or regulations, the most restrictive will prevail.
- The responsibility for application of this Policy rests with all of FG VALVOLE

## 4 ANTI-HUMAN TRAFFICKING

### 4.1 INTRODUCTION

International law is a powerful conduit for combating human trafficking. The most reputable and recent instruments of international law that have set the course for how to define, prevent, and prosecute human trafficking are the United Nations Convention against Transnational Organized Crime and its two related protocols: the United Nations Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children, and the United Nations Protocol against the Smuggling of Migrants by Land, Sea, and Air, which entered into force in 2003-2004. The United Nations Office on Drugs and Crime (UNODC) created these conventions, which have supported international law's ability to combat human trafficking. In support of enforcing these instruments, the UNODC established the United Nations Global Initiative to Fight Human Trafficking (UN.GIFT) in 2007.

## 4.2 COMPANY ROLE

FG VALVOLE will implement this policy through

- Employee acknowledgement of receipt of the policy and related training
- Compliance plans
- Incident reporting

As required by a funder or local law, country offices may edit the related resources listed at the end of this policy to ensure they are sensitive to the local context. In addition, country offices may translate the policy and any of the related resources in local languages as required

FG Valvole prohibits:

- Engaging in any form of human trafficking
- Engaging in commercial sex acts that may be directly associated with FG Valvole, which includes during work hours, while attending off-site functions, and any time in work travel status
- Using forced labor of any kind for any reason
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents
- Using misleading or fraudulent recruiting practices
- Charging employee candidates recruitment fees for employment
- Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside that employee's nation of residence
- Providing or arranging housing that fails to meet the host country's housing and safety standards
- Failing to provide proof of employment or similar work document in writing prior to the employee departing from his or her country of origin

## 5. RECEIPT OF THE POLICY AND TRAINING

All FG VALVOLE staff will acknowledge receipt and understanding of FG VALVOLE's Ethics Policies and accompanying resources upon hire and annually when they complete the Code of Ethics training.

FG VALVOLE employees are responsible for complying with this policy as well as completing any associated training mandated as a condition of continued employment. When engaging outside parties, FG VALVOLE staff will ensure that the requirements of this policy are communicated to Pact sub-awardees, independent contractors, and vendors.

## 6. MONITORING AND REVIEWING POLICY

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The policy will be regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The Company will ensure that all individuals working for the Company are advised of the policy.

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

## 7. BREACHES OF THIS POLICY

The breach of this policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.



## COMPANY PROCEDURE

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All colleagues will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the People & Culture Team.