

HUMAN RESOURCE MANUAL	GUIDELINE ON CHILD LABOUR	Guideline No
		HR/74

1 . PURPOSE:

Our Company, that is Gujarat Fluorochemicals Limited, GFL Americas LLC., GFL GmbH, GFL GM Morocco and IWL, IWISL, IRL is committed not to accept child labour, and works actively against it. The complexity of the child labour issue requires a consistent, long-term effort to create sustainable and broad-based solutions in order to reach our goal; that no products delivered by the Company and delivered to the Company are produced by child labour. The Company respects different cultures and values in countries where it operates and sources its products, but does not compromise on the basic requirements regarding the Rights of the Child.

The Policy has been established in order to make the company position clear to all its employees, suppliers and their co-workers, as well as any other parties. The requirements in this guideline are mandatory to all employees working in the company, company suppliers and their sub-contractors.

2. GENERAL PRINCIPLE

The Company shall not accept child labour. It supports the United Nations (U.N.) Convention on the Rights of the Child (1989). The Child Labour policy is based on this Convention, which stipulates:

- “All actions concerning the child shall take full account of his or her best interests.” Article 3.
- “The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development”. Article 32.1.

In addition, this policy is based on the International Labour Organisation (ILO) Minimum Age Convention no. 138 (1973). According to this convention, the word “Child” is defined as any person below fifteen (15) years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. If, however, the local minimum working age is set at fourteen (14) years of age in accordance with exceptions for developing countries, the lower age will apply.

This Policy also incorporates the ILO Convention on the Worst Forms of Child Labour no. 182 (1999).

3. IMPLEMENTATION

- a. As a policy the Company shall not engage anyone below the age of eighteen. It shall also not any labour below the age of eighteen to be engaged by any contractor to be deployed in its premises.

All actions to avoid child labour shall be implemented by way of verification of age certificate and any other relevant document which authenticates the date of birth of the person.

- b. The Company requires that all its employees, suppliers shall recognise the U.N. Convention on the Rights of the Child, and that the suppliers comply with all relevant national and international laws, regulations and provisions applicable in the country of production. Suppliers and contractors are obliged to take the appropriate measures to ensure that no child labour occurs at suppliers’ and their sub-contractors’ places of production.

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- c. If child labour is found in any place of production, the company will require the supplier to implement a corrective action plan. If corrective action is not implemented within the agreed time-frame, or if repeated violations occur, the Company will terminate all business with the supplier concerned. The corrective action plan shall take the child's best interests into consideration, i.e. family and social situation and level of education. Care shall be taken not merely to move child labour from one supplier's workplace to another, but to enable more viable and sustainable alternatives for the child's development.
- d. The supplier shall effectively communicate to all its sub-contractors, as well as to its own co-workers, the content of the company's Child Labour Policy, and ensure that all measures required are implemented accordingly.

4. LABOUR FORCE REGISTER

The Company shall maintain documentation for every employee verifying the worker's date of birth. Supplier and Contractors must use appropriate assessment methods as per local practice and law where such official documents are not available.

5. MONITORING

All suppliers are obliged to keep the Company informed at all times about all places of production (including their sub-contractors). Any undisclosed production centres found would constitute a violation of this code of conduct.

Through the General Purchasing Conditions for the supply of products to the Company, the company has reserved the right to make unannounced visits at any time to all places of production (including their sub-contractors) for goods intended for supply to the company. The Company furthermore reserves the right to assign, at its sole discretion, an independent third party to conduct inspections in order to ensure compliance with the company's Child Labour policy.

6. REMEDIATION

Where, following inspections at supplier's premises or through any other sources of information, company personnel become aware of the use of child labour within the company or by its suppliers or sub suppliers, they immediately shall check their IDs as part of routine document check process without raising the alarm.

The supplier and the Company shall agree on a corrective action plan, which may comprise the following actions:

- a. Collate a list of all potential child labourers and young workers. Remove the children from all work immediately ensuring children are in safe place.
- b. Obtain contact details of child and parents/guardian (contact number, address) wherever possible.
- c. Clarify the true identity and age of the child. Review age documents of the child and verify they are genuine.
- d. Understand the children's desires and explore the opportunities for them to re-enter education. Ensure they agree to participate in the remediation plan by explaining the legal requirements and restrictions on working ages to the children and assure them that, if they wish, they will be employed when they reach working age.
- e. Provide free food and safe accommodation to the child until the remediation plan is operational. Arrange payment of stipend to the child during the exploratory phase and throughout the remediation plan.

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- f. Whether the child contributes to the livelihoods of their family or they are self-dependent, his or her wage should continue be paid until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an unemployed adult family member in place of the child labor).
- g. Seek advice and help from a recognized local non-governmental organization that deals with child labour or the welfare of children.
- h. Develop a remediation plan that secures the children’s education and protects their economic well-being, in consultation with the Company representatives and where possible a local NGO, and in consultation with and respecting the views of the child and parents/guardian.
- i. Document all actions and obtain signed agreements from the parent/guardian of each child and all parties to the remediation setting out the elements of each child’s remediation programme and duties of each party in ensuring the success of the remediation.
- j. Ongoing support and monitoring of progress of the remediation programme to ensure that it continues to benefit the child he or she reaches working age. This includes monitoring the child progress at school, exam results, school reports, discussions with teachers etc. Home visits on regular basis on their hopes, fears and ambitions. Regular payment of stipend, school fees and any other expenses.
- k. Develop processes to prevent recurrence

7. BREACH OF THIS POLICY

Such actions shall be considered by the company as evidence that the supplier is not committed to child labour remediation:

- i. Expel any of the suspected or confirmed child labour and/or young workers
- ii. Threaten the children or their families or hamper the progress of investigation and remediation
- iii. Conceal or falsify any documentation

Violation of this policy or the refusal to cooperate shall result in disciplinary action, up to and including suspension or termination of employment with the Company.

8. POWER TO AMEND:

- a. Any change of the guideline shall be approved by the Head – Group Corporate HR.
- b. The management shall have the overriding right to withdraw and/or amend the guideline at its own discretion as it deems fit from time to time. The decision of the management shall be final and binding.

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