

## CHILD AND FORCED LABOUR

### PURPOSE & SCOPE

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Forced labour can take many forms, including human trafficking, slavery, and child labour. These are pervasive problems throughout the world. Unfortunately, there are no effective international agreements that define the practice or create enforcement mechanisms against them. As a global employer and purchaser of services and goods, Visy has a role to play in these issues.

Visy has adopted Guidelines on Child Labour, and will apply the Principles set out in this document to reinforce its core value of treating all people with dignity and respect.

It is the responsibility of local management to implement and ensure compliance with these Principles at Visy facilities in each state or territory in Australia, and any country it operates in around the world.

Visy Procurement & Sourcing has responsibility for ensuring the implementation and compliance with the Principles on a global basis by Visy suppliers and contractors.

### DOCUMENT OWNER

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Human Resources Corporate, Level 11, 2 Southbank Boulevard, Southbank, Vic, 3006.

### REVIEW DATE

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### POLICY

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#### 1. PRINCIPLES

Visy will not tolerate the use of child or forced labour, slavery or human trafficking in any of its global operations and facilities.

These Principles apply to all Visy entities, related bodies corporate, worldwide subsidiaries and joint ventures.

Visy will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, or the trafficking, physical punishment, abuse, or involuntary servitude of any worker.

Visy expects our suppliers and contractors with whom we do business to uphold the same standards. Should a pattern of violation of these Principles become known to Visy and not be corrected, we shall discontinue the business relationship.

For purposes of these Principles, a “child” is anyone who is less than 16 years of age, and a “younger person” is anyone who is between 16 and 18 years of age.

Visy supports temporary workplace internship and apprenticeship education programs for younger persons as well as customary seasonal employment so long as such persons are closely supervised and their psychological wellbeing, safety, health, and compulsory education are not compromised.

The Guidelines set out in this document are provided to interpret and apply these responsibilities.

## 2. GUIDELINES ON CHILD LABOUR

### 2.1 Definition of child

For purposes of these Principles, Visy defines a “child” as anyone who is less than 16 years of age, notwithstanding any national law or local regulation that permits a worker to be less than 16 years of age to be employed.

At any site or location where a national or local law or regulation provides for a minimum employment age greater than 16 years, or imposes additional restrictions in activities such as hazardous work, such laws and regulations must be observed.

### 2.2 Hazardous work

In the case of hazardous work, any younger person or child must not be employed. In determining whether work may be hazardous, consideration should be given to:

- Work which exposes them to the possibility of physical, psychological or sexual abuse;
- Work underground, under water, at dangerous heights or in confined spaces;
- Work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads;
- Work in an unhealthy environment which may, for example, expose them to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; or
- Work under particularly difficult conditions such as work for long hours or during the night or work where they are unreasonably confined to the premises of the employer.

### 2.3 Temporary employment

In accordance with our Principles, a younger person or a child may be employed on a temporary basis for a fixed term under certain conditions. This employment should be documented and reviewed from time to time by local management under the following guidelines:

- The employment is a temporary internship, apprenticeship, or is a seasonal common and customary practice in the industry;
- The employment does not interfere with compulsory schooling;
- The younger person or child is working with the permission of his or her parent or legal guardian;
- The employment does not violate any applicable labour law or regulation;
- The employment will be directly supervised; and
- The younger person or child’s safety, health, and psychological wellbeing will be a primary concern.

Examples of customary seasonal employment include work required in seasonal fruit and produce packaging, carton erecting and other seasonal activities

The management of Procurement & Sourcing may apply these Guidelines for the temporary employment of younger persons and children by the suppliers and contractors of Visy, and by the suppliers and contractors of Visy’s worldwide operations and joint ventures upon the same conditions.

It is necessary to document temporary employment of younger persons. Local management is responsible for maintaining appropriate records to document that any such employment is consistent with our Principles and Guidelines.

Employment records should be retained indefinitely whilst active in the payroll/employment systems. After the cessation of employment, they are subject to the policies of the pertinent records retention program and guidelines established by law or legislation. All persons employed by Visy must have employment records maintained in the formal payroll systems used in Visy businesses.

## **2.4 Verification of age**

Both local management, and each supplier, are individually responsible for verification of the age of any person selected for any particular type of employment with either of them.

Commonly accepted proof of age includes, but is not limited to: a government-issued birth certificate with raised seal; a record of birth maintained in connection with religious practices that is contemporary with the birth and shows the date of the birth event; or an official passport showing the age of the child when such record has been in existence for at least a year.

A driver's licence is NOT acceptable evidence of proof of age.

## **3. GUIDELINES OF TRAFFICKING AND FORCED LABOUR**

Globally, governments broadly define trafficking in persons as all conduct involved in reducing a person to, or maintaining a person in, a state of compelled service for sex or labour.

Forced labour is any and all work or service which is exacted from any person under the menace of any penalty for its non-performance and for which the worker does not offer himself or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that that labour is not forced or compulsory.

### **3.1 Visy commitments regarding forced labour**

The Visy Group, together with its worldwide subsidiaries, affiliates, joint ventures or other associated entities, will not use forced labour in any of its operations anywhere in the world. This commitment also extends to the use of any factory or sub-vendors who make or assemble Visy products.

The Visy Group will not purchase, rent, lease, borrow or otherwise use any products, goods, services, or raw materials anywhere in the world made or provided by a supplier who knowingly uses forced or involuntary prison labour.

### **3.2 Examples of what constitutes forced labour**

Examples of forced labour include:

- Otherwise legal child or young person labour where the child or young person has no choice about whether to work or not;
- The work or service of prisoners if they are hired out or placed at the disposal of private individuals, companies, or associations involuntarily and without supervision of public authorities;
- Involuntary labour for development purposes required by the authorities, including assistance in construction, agriculture, and other public works;
- Work required in order to punish opinion or expression of views ideologically opposed to the established political, social or economic system; or
- Bonding workers through debt.

Forced labour does not include:

- Compulsory military service for persons over the age of 16 of a purely military character;
- Normal civic obligations such as jury duty; or
- The work or service of prisoners resulting from a conviction in a court of law which is carried out under the supervision and control of a public authority.