



Child labor policy

Version

Version	Datum	Auteur	Description
0.9	01-03-2021	EF	Concept version
1.0	04-06-2021	EF	Definitive version

Policy brief & purpose

Our child labor policy is our position on employing minors and aims to ensure that ARGO360, its subsidiaries and everyone we're connected with follows the law and cares for children's interests.

A child is defined as someone under the age of 18 under the UN Convention and the ILO Conventions. ARGO360 complete supply chain is free of minors under the age of 15, in accordance with ILO Convention 138 on minimum age and the Responsible Business Act.

Under the UN Convention and the ILO Conventions refers that the definition of a child is a group of people that any individual under the age of 15, or under the age of completion of compulsory schooling, or under the minimum age of work in the country they inhabit" is defined as a minor. According to ILO Convention 182, young workers or youth aged between 15 to 18 are permitted to undertake light Labor under the supervision of an adult, with limits on overtime and dangerous employment.

As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn't take part in children's exploitation and also helps end it to the best of our ability.

Scope

This policy applies to our entire organization and those we do business or partner with including suppliers, vendors and contractors.

The [International Labor Organization \(ILO\)](#) and the [U.N Convention on the Rights of the Child](#) guide our policy on child labor. When it comes to legal aspects, we always:

- Follow the stricter law if more than one laws apply (e.g. state and federal, local and international).
- Require suppliers, partners and vendors to follow the stricter applicable laws and recognize children's rights. They must also require their own suppliers, subcontractors and stakeholders to do the same.
- Always in consideration of International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, International Labor Organization (ILO) Convention No. 138 on the minimum age for admission to employment and work, International Labor Organization (ILO) Convention No. 182 on the worst types of child employment, United Nations Guiding Principles on Business and Human Rights (UNGP) These are fundamental principles we based this policy on.

In this policy, we refer to "children" as people who are younger than 18 years of age. "Young children" are people younger than 15.

"Child labor" refers to work that deprives children of their childhood and affects their schooling, their potential and their dignity. Its work that's harmful to them Mentally, physically and socially.

Policy elements

Young children

When it comes to young children (younger than 15), we don't want to stand in the way of their health, schooling or free time. That's why we don't and won't employ anyone younger than [15 years] of age and require our subsidiaries to do the same, regardless of the country they're in.

We're also committed not to do business with any organization that employs children younger than 15. We'll include this condition in every contract we sign and reserve the right to break the contract without penalty if our stakeholder violates this condition and refuses to agree on or follow through with an elimination plan.

Legal exceptions

Parental employment. We might occasionally do business with family-owned businesses. Those businesses are usually allowed to employ the owner's young children as long as the work isn't too hazardous (e.g. mining, manufacturing). We accept this regulation, but we'll still dissolve our contract if it comes to our attention that these children are exposed in danger or are working consistently during school hours.

Occasional work. Sometimes, parents bring their children to work to teach them skills and introduce them to a work environment. They may also hand them some tasks to complete (e.g. a computer repair person may ask their child to help with installing or repairing computers). This is an acceptable practice, as long as it doesn't deprive children of school on a consistent basis or puts them in any danger.

Older children

When it comes to employing children who are older than 15, we'll always follow the local and international laws. As a general rule, these children can have a job, but they should never do work that jeopardizes their health and safety or affects their schooling and development.

With this rule in mind, we may employ children older than 15 for light work such as *stocking shelves, being cashiers, delivering packages in short distances on bicycles, light cleaning duties etc.* They will not use any heavy or dangerous equipment, chemicals or vehicles when working.

We'll determine their work hours and wage based on applicable laws. We won't employ children for more than the maximum weekly or daily hours allowed.

These are mandatory conditions when forming partnerships or other business relationships. We'll refuse to do business with anyone who employs children of any age in hazardous or exhausting jobs or doesn't follow applicable laws on working hours or pay. We also expect them to communicate and enforce the no child labor policy to their own contractors.

Supply chain Employment

ARGO360 itself does not employ people in high risk areas, the reference "employment" in the Child labor policy refers to the employees of its first- and second-tier suppliers. ARGO360 considers the local Partner as first-tier suppliers and the agents as second-tier suppliers. The collection points are lower-tier suppliers.

Actions and Implementation

To make sure we enforce this policy and help eliminate child labor, we're committed to:

- Working with governments and other organizations to end child labor. We may sponsor or organize actions to educate communities.
- Educating our staff on youth work laws and show them how to report child labor if they see or suspect it.
- Requiring hiring managers and HR to avoid hiring minors under the legal age for working. We also expect them to know and follow this policy and laws on wages and hours for older children.
- Keeping and validating documentation verifying our employees' age after they're hired. If we discover that we've hired a minor under the age of 18, we'll review applicable laws and adjust working hours accordingly. If we need to let the child go, we'll assess their situation and make sure to provide for them to the best of our ability (e.g. pay him or her their would-be salary for a couple of months) when necessary.
- Communicating our no child labor policy to organizations we're connected with and ensure our contracts have the right stipulations.
- Auditing suppliers and partners periodically to ensure they aren't involved in child labor, possibly with unannounced onsite visits too. We'll require them to provide us with an updated list of all their business locations at all times. If we discover hidden business sites that employ children, we'll dissolve our contract immediately.
- Demanding and monitoring an elimination plan in cases where suppliers discover child labor in their business. We'll also work together with the stakeholder to create plans to support children, keeping their best interests in mind, and make efforts to involve them and their families in the process.
- Employing or consulting with experts on topics like child labor, health and safety standards or corporate social responsibility.

Reprimand action(s)

If child Labour is discovered, ARGO360 will begin the mitigation measures outlined below to guarantee that the minor is not active in the e-waste collection network. Distributors and facilities are required to work together to develop a preventive that is in the child's best interests. ARGO360 will cancel and revoke the business connection if the collaborator does not participate to prevent child Labour or if the minor is discovered in the supply chain again.

- Cooperation with the involved business partner is paused until the next steps are accepted
- Once arrived at the collecting point, the child is withdrawn from the spot
- Detailed data about the kid should be given: name, date and location of birth, family
- Circumstances, educational background, begin working date, the complete working hours, and wage is recorded
- ARGO360 CEO and its operation department will be briefed
- The event must be documented through the complaint system via the domestic partner. (excel sheet)
- A parent or accountable contact person, as well as a domestic NGO focusing on children's the rights of minor, are contacted.