

Fillable version of FSC-STD-40-004 Annex D. FSC core labour requirements self-assessment (normative)

Under FSC-STD-40-004 *Chain of Custody Certification*, organizations shall apply the FSC core labour requirements to their operations. FSC has determined that to do so, the organization shall:

1. adopt and implement a policy statement, or statements, that encompass the FSC core labour Requirement's; and
2. maintain an up-to-date self-assessment in which the organization describes how the organization applies the FSC core labour requirements to its operations.

The following offers guidance on how the organization can fulfil these requirements.

Requirements

FSC has developed a series of requirements that apply to all CoC-certified organizations. They are as follows:

FSC core labour requirements¹

7.1 In the application of the FSC core labour requirements, the organization shall give due consideration to the rights and obligations established by national law, while at the same time fulfilling the objectives of the requirements.

7.2 The organization shall not use child labour.

7.2.1 The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.

7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal daytime working hours.

7.2.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulations.

7.2.4 The organization shall prohibit the worst forms of child labour.

7.3 The organization shall eliminate all forms of forced and compulsory labour.

7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.

7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:

- physical and sexual violence
- bonded labour

¹ Source: FSC report on generic criteria and indicators based on ILO Core Conventions principles (2017).

- withholding of wages /including payment of employment fees and or payment of deposit to commence employment
- restriction of mobility/movement
- retention of passport and identity documents
- threats of denunciation to the authorities.

7.4 The organization shall ensure that there is no discrimination in employment and occupation.

7.4.1 Employment and occupation practices are non-discriminatory.

7.5 The organization shall respect freedom of association and the effective right to collective bargaining.

7.5.1 Workers are able to establish or join worker organizations of their own choosing.

7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.

7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

7.5.4 The organization negotiates with lawfully established workers' organizations and/or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.

7.5.5 Collective bargaining agreements are implemented where they exist.

Policy statement

FSC requires the organization to have and implement one or more policy statements that encompass the FSC core labour requirements (above). Many organizations already have statements or implemented policies that cover the principles and practices outlined in the FSC core labour requirements, and such statements and implemented policies may be used to demonstrate compliance with the Chain of Custody Standard.

An acceptable statement need not be a verbatim recitation of the FSC core labour requirements. The statement merely needs to cover the scope of the principles outlined in the FSC core labour requirements. However, merely having a statement alone, including a verbatim recitation of the FSC core labour requirements, is not sufficient. Rather, the statement or statements, shall be accompanied by a completed self-assessment in which the organization indicates its compliance with the scope of the FSC core labour requirements and the organization's implementation of the policy statement or statements. The policy statement or statements shall be accompanied by documentation that indicates its implementation.

For example, an organization that has a policy statement prohibiting employment of anyone younger than 18 years old satisfies the requirement of having a policy covering Clause 7.2 (prohibition of child labour). The organization would still need to provide evidence, including documentation in the self-assessment, to demonstrate the implementation of that policy statement.

The self-assessment

Instructions: Each organization shall complete the self-assessment in which the organization describes how it applies the FSC core labour requirements to its operations. The certification body uses the self-assessment to guide the audit and verification of compliance with the standard. FSC has designed this process to be an efficient and cost-effective means to verify compliance with the requirements, while at the same time to ensure compliance with applicable law. The process benefits from the organization's knowledge of its operations and applicable laws to assist the auditor in completion of the audit.

The organization shall declare on the self-assessment that the statements are true and correct to the best available knowledge. The organization knowingly making false statements on its self-assessment may result in suspension or termination of the certificate.

The organization shall respond to the questions in the self-assessment as completely and truthfully as possible. Organizations shall identify relevant documents and other materials that the auditor can review to verify the referenced statement on the self-assessment.

NOTE: For Multi-site or Group CoC certificates, the Central Office shall be responsible for completing the self-assessment for all Participating Sites under the scope of the certificate.

Central to the FSC core labour requirements is their interplay with applicable national law. At all times, organizations are expected to comply with applicable national law. However, in some situations, national law allows action that is prohibited by the FSC core labour requirements or gives rights to the organization that may result in behaviour that contravenes the principles of the FSC core labour requirements. In those situations, the organization is expected to give due consideration to the rights and obligations established by national law, while at the same time fulfilling the objectives of the requirements. How to achieve that balance is not always clear and is best accomplished by an explanation offered by the certificate holder in the self-assessment. In rare cases, the response may require an analysis regarding compliance with applicable law to provide clarity to the certification body, and that analysis should be included as part of the response.

Examples of questions that may prove helpful in completing the self-assessment:

FSC has provided the following open questions that may be helpful to the organization to take into consideration when completing the self-assessment. The questions are broken down into four categories covered by the FSC core labour requirements. The level of detail required will depend on the location of the organization’s operational site, including the organization’s assessment of risk, and the labour environment. This list of questions is not exhaustive.

Category	Question
Child Labour	<ul style="list-style-type: none"> • What is the statutory, legal, or regulated minimum age at the place of your operations? • What measures have you taken to ensure that child labour is not used in your operations? • Do you register the age (birthday) of your workers and how do you verify that this is the actual age? Do you check the identification papers? • If there are legal or regulatory restriction which to your understanding would limit your ability to comply with the requirement, describe how you mitigate those limitations. • If you employ workers below the age of 18, describe what measures you have taken to ensure that they don't perform hazardous or heavy work. If there are a requirement for training and education, indicate supporting documents. • Is the employment of children between the age of 13 or 15 legally allowed? Do you employ children between that age? If yes on both accounts, specify measures you have taken to ensure that they only perform light work that is not harmful to their health or development and that allows them to work outside school hours only.
Forced Labour	<ul style="list-style-type: none"> • Describe your recruitment and contracting practices to show compliance with this principle. • Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case? • How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment? • How do you ensure that the workers do not experience any form of mobility restriction? • How do you ensure that the workers have access to their passports and identification documents at all times while at the same time offering a safe place for storing the documents? • How do you ensure that there are no threats of denouncing workers to the authorities?
Discrimination	<ul style="list-style-type: none"> • How do you ensure that wages and other working conditions are non-discriminatory? • Is there gender/age ratio parity? • Do you have an ethnically diverse workforce? • Do you have policies about non-discrimination? • Do you ensure all employees have equal opportunity for promotion? • How do you ensure applicants have equal opportunity for employment? • If there are legal or regulatory restriction which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?
Freedom of Association and the Right to Collective Bargaining	<ul style="list-style-type: none"> • Are workers organised into a trade union? To the best of your knowledge, describe why you believe the workers have or have not chosen to be represented by a trade union. • If workers are represented by a union, is the union autonomous and independent? • What forms of worker representation other than unions exist at the site? • Are there collective bargaining agreements in place that cover workers, and if so, how do you ensure compliance with such agreements?

FSC core labour requirements self-assessment

Attestation: I, Lakshmanan Ganapathy, hereby affirm that the following statements are true and correct to the best of my knowledge, and I acknowledge making a knowingly false statement can result in the suspension or termination of the certificate or non-issue of the certificate.

Lakshmanan Ganapathy
Name

22nd May 2023
Date



Child Labour

Requirement	Questions	Answer
7.2 The organization shall not use child labour.	a) Does your organization comply with Clause 7.2? If yes, continue at c).	Yes
7.2.1 The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.	b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.2.	Not applicable
7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal daytime working hours.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.2.	7.2.2 The Ministry of Human Resources and Emiratization (MoHRE) does not issue work permits to expats under the age of 18 however the employment policies of AGPP made it clear that concerned people would only hire people who were at least 20 years old. When hiring for any position, AGPP verifies the applicant's age using either their national passport and their academic qualifications
7.2.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.		7.2.3 & 7.2.4 Not Applicable we are not hiring employee below age of 18 and as
7.2.4 The organization shall prohibit the worst forms of child labour.		

		<p>per the company policy company recruitmens policy says “no candidate below the age of 20 would be employeed” age can be verified by the recruiting managers as per passport or academic certificates. All managers shall adhere to the policy, if not their visa will not be processed.</p>
	<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.2.</p>	<p>To complay with the clause 7.2, the below listed documents can be verified.</p> <p>Employment hiring procedure and employee records which includes the date of birth for Home country Passport of employees Employee Census Record updated in the system * Employment VISA copy DOB can be verified - Employee Passports & Academic Qualification Certificates will be verified at the time of interview and also arranging employment VISA</p>
	<p>e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.2. Please describe them, and how they impact your ability to comply with Clause 7.2.</p>	<p>As the company comply with UAE labour laws which is taking care of clause 7.2 and there will not be any legal obligations.</p>

	f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.2.	<p>Please see our FSC Policy Statement regarding child labour in our website</p> <p>http://www.alghurairprinting.com/qualityAssurance.aspx</p> <p>Also pics attached (with policy Display)</p>
--	---	--

Forced Labour

Requirement	Questions	Answer
<p>7.3 The organization shall eliminate all forms of forced and compulsory labour.</p> <p>7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.</p> <p>7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:</p> <ul style="list-style-type: none"> • physical and sexual violence • bonded labour • withholding of wages /including payment of employment fees and or payment of deposit to commence employment • restriction of mobility/movement • retention of passport and identity documents • threats of denunciation to the authorities. 	<p>a) Does your organization comply with Clause 7.3? If yes, continue at c).</p>	<p>Yes, We have labour contract agreement which will be signed by both the parties employee and employer. Where all the terms and conditions of the contract clearly mentioned and agreed. After that only we initiate the employment VISA process.</p> <p>The company complies to the clause 7.3 all the requirements addressed in the our policy “Forced labour / contract labour, which excels the commitment to eliminate all forms of forced labour or contract labour.</p> <p>As per UAE labour law company signs contract with each employee for a period 2 years and emiartes id will be issued after medical fitness test. So no one have right to keep any employee beyond the contract period. also no one is authorized to force or bond any labour beyond the contract. All the employees have right to resign and go to their home country on one month notice period. (Referer forced / bonded labour policy)</p> <p>As per the UAE law if the company didn’t process agreed wages to the employees through WPS company trade license get bloced.</p>

	b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.3?	Not applicable
	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies Clause 7.3?	<p>* We cover all the requirements during the during induction program which covers following points.</p> <p>a) physical and Sexual violence, AGI have made 3 polices and Implemented across the group to Control Physical and Sexual Violence / Harassment</p> <ol style="list-style-type: none"> 1.Code of conduct policy 2. Ant-Bullying and Harassment Policy 3. Disciplinary Policy <p>In addition to this,"iCare" application is available for anyanonymous complaint with privacy. These complaints will reached to Pepoples partner / HR authorities. When evern such complaints comes, Committee of HR and Line manger will investigate immediately to know the facts of the complaints.</p> <p>Deciplinary actions will be taken against the proved guilty or breaches the above plocies in terms of physical and Sexual violence.</p>

		<p>If any employee involved in any disciplinary action at the workplace. It will be reported to the disciplinary committee which is heading by HR Head and other core team members. Based on the initial enquiry report submitted by the respective LM and HR Head will issue a Suspension letter for 7 days immediately, after that the formal enquiry will be initiated and based on the findings the appropriate action will be recommended by the committee and submitted to the General Manager based on his confirmation appropriate action will be action as per company norms.</p> <p>b) not applicable</p> <p>c) Providing free visa and tickets for employment and not charging any fees from candidates. We are also not deducting any expenses from the employees after joining as well.</p> <p>d) Employees are free to move around and also learn and understand their colleagues works there is no any restriction from the company side.</p> <p>e. We are not retaining any employee without their consent.</p> <p>f. Both the parties are not allowed, any such thing it will be handled based on disciplinary & equal opportunity policy and Antibullying and harassment policy. As per UAE Wage protection system, all the companies have to process their employees salaries through WPS system, the</p>
--	--	--

		<p>same will be verified by the Govt. on monthly basis through inspection. if there is no compliance the companies will get hefty penalties.</p> <p>if we do not process through WPS system, the company trade license will get blocked</p>
	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.3.	/ Employee records & employment contracts signed by all employees / Disciplinary Policy / Anti bullying and Harrassement policy / Equal opportunities policy
	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.3. Please describe them, and how they impact your ability to comply with Clause 7.3.	None
	f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.3.	<p>Please see our FSC Policy Statement regarding forced and compulsory labour in our website</p> <p>http://www.alghurairprinting.com/qualityAssurance.aspx</p>

Discrimination in Employment and Occupation

Requirement	Questions	Answer
<p>7.4 The organization shall ensure that there is no discrimination in employment and occupation.</p> <p>7.4.1 Employment and occupation practices are non-discriminatory.</p>	<p>a) Does your organization comply with Clause 7.4? If yes, continue at c).</p>	<p>Yes</p>
	<p>b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.4.</p>	<p>Not applicable</p>
	<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.4.</p>	<p>We are briefing during our inductions regarding the discrimination at work place and we have dedicated policy which covers all the points.</p> <p>AGPP as a company we have not encountered any discrimination issues so far.</p> <p>The Group has, with the help and cooperation of our people, built a culture of zero-tolerance towards any discrimination. Our people should show a commitment to not discriminate or harass other people, current and former employees, job applicants, clients, customers, suppliers and visitors.</p> <p>This commitment extends beyond the workplace when representing the group with customers, suppliers or other work-related contacts. It also extends to work-related trips and events including social events.</p> <p>Questions concerning pregnancy, age, race/ethnic origin, sexual identity, religion, or severe disability are not allowed</p>

		<p>within company policy and human resources operating procedures in all sites of our certificate. Our people come from many different cultures and nationalities, and we need to be respectful of all points of view and practices. What may seem like to joke to one of our people may be harassment or discrimination to another. Our policy lists the following forms of discrimination that are prohibited and may be unlawful under local law in the country of operations:</p> <ul style="list-style-type: none"> i. any distinction, limitation, exception or preference among because of a Protected Characteristic. ii. harassment, including sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt further in the Company's Anti-harassment and Bullying Policy. iii. victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. <p>Positive discrimination, where some of our people are actively supported in the workplace (any advantage, preference or benefit conferred on women, children, GCC nationals or local nationals in the country of operations, the disabled, elderly or others) is not a breach of this policy if it follows the local law in the country of operations .</p>
--	--	---

	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.4.	Equal Opportunities Policy / Grievance Policy /
	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.4. Please describe them, and how they impact your ability to comply with Clause 7.4.	None
	f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.4.	Please see our FSC Policy Statement regarding discrimination in employment and occupation in our website http://www.alghurairprinting.com/qualityAssurance.aspx Photos attached.

Freedom of Association and the Right to Collective Bargaining

Requirement	Questions	Answer
7.5 The organization shall respect freedom of association and the effective right to collective bargaining.	a) Does your organization comply with Clause 7.5? If yes, continue at c).	No
7.5.1 Workers are able to establish or join worker organizations of their own choosing.	b) If the answer is no to a) above, please describe how or why your organization does not comply with Clause 7.5.	Labour unions or workers councils are not legal in the U.A.E labour law no 8.
7.5.2 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organization knows it complies with Clause 7.5.	Not applicable
7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.5.	Not applicable
7.5.4 The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.5. Please describe them, and how they impact your ability to comply with Clause 7.5.	Not applicable
7.5.5 Collective bargaining agreements are implemented where they exist.	f) Attach a policy statement, or statements, made by your organization that encompasses Clause 7.5.	Not applicable