



**GLOBAL  
BATTERY  
ALLIANCE**

BATTERIES POWERING  
SUSTAINABLE DEVELOPMENT

**GBA** BATTERY  
PASSPORT

# Child Labour Index

Developed in collaboration with



LEVIN SOURCES

# Table of Contents

|   |    |
|---|----|
| Key to the icons .....  | 2  |
| The Child Labour Index  |    |
| Core expectations for any enterprise that is a user of the GBA Battery Passport.....  | 3  |
| Additional expectations for enterprises that have identified child labour as a salient issue in their operations, supply chains or business relationships, or where the risk of child labour is medium or high per the UNICEF Children's Rights Atlas. .... | 7  |
| Incident expectations for companies who have identified at least one incident of child labour in their operations, supply chains, or business relationships.....  | 31 |

Disclaimer: This document is published by the Global Battery Alliance. The findings, interpretations and conclusions expressed herein are a result of a collaborative process facilitated and endorsed by the Global Battery Alliance but whose results do not necessarily represent the views of the entirety of its Members, Partners or other stakeholders. © 2022 Global Battery Alliance.

All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means, including photocopying and recording, or by any information storage and retrieval system.





# The Child Labour Index

Version 1.0

*Please see accompanying document for introduction and background to this version 1.0 of the CLI.*

*Developed in collaboration with*



LEVIN SOURCES

# Key to the icons



Index is equivalent to the given standard. An enterprise certified by this system does not need to answer this question.



Index is partially equivalent to the given standard. An enterprise certified by this system needs to answer this question for those aspects that are not aligned.



Index is not equivalent to the given standard. An enterprise certified by this system still needs to answer this question.



This expectation aligns with and **goes beyond** UNICEF (2013) [Child Rights Impact Assessment Tool](#)



This expectation aligns with UNICEF(2013) [Child Rights Impact Assessment Tool](#)



This **CLI** expectation will move to another issue index after Davos 2023.



Horizontal – this indicator pair will be found in other issue indices, in adapted form.



Fundamental – this indicator pair will be moved into, or adapted into a new management systems index. Where it will be adapted into a new MSI, then it will remain in the CLI.



Specific – this indicator pair will only be found in this index.










## NOTE TO THE READER

We encourage readers first to read the [Background & Glossary](#) for the Human Rights Index (HRI) and Child Labour Index (CLI) which provides an important explanation of the development, scope, structure, and logic of both indices, as well as key definitions.

# Core expectations for any enterprise that is a user of the GBA Battery Passport

**Core criteria** apply to any enterprise and its supply chains, regardless of where they operate or do business.

## Provision 1: Policy commitment on the right of children to be free from child labour

| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains) | Guidance Placeholder   | Indicator Type  |
|--|---|---|--|---|
| <b>Criterion 1.1: Content</b><br>The enterprise has a policy and public commitment in regard to children's right to be free from child labour and this applies to its operations and business relationships. It puts in place the management systems necessary to implement this policy and commitment.  |   |   |  |   |
|  <p><b>C11.1.</b><br/> <b>Statement on the minimum age for employment</b><br/>                     in line with international minimum standards.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 1<sup>1</sup></li> <li>• ILO-IOE 2014, C1.1.1<sup>2</sup></li> <li>• UNICEF 2013<sup>3</sup>, CRBP<sup>4</sup> 2, P§9.</li> </ul> |  <p>The enterprise has a policy clearly stating the minimum age for employment and this applies across its operations and business relationships. <b>(1)</b></p> <p><i>AND</i></p> <p>The policy is in line with the higher standard as captured in either national law or international minimum standards. <b>(1)</b></p> |   |  | <br>Specific   |
|  <p><b>C11.2</b><br/>                     Alignment with international recognised child labour frameworks.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 1.</li> <li>• UNICEF 2013, CRBP 2</li> </ul>  |  <p>The policy is aligned with:</p> <ul style="list-style-type: none"> <li>- <b>ILO Convention 138</b> (minimum age) and <b>182</b> (Worst Forms of Child Labour) <b>(1)</b></li> <li>- Article <b>8.7</b> of the <b>UN SDGs</b> <b>(1)</b></li> </ul>   |   |  | <br>Specific   |
|  <p><b>C11.3</b><br/>                     Safe work and decent working conditions for young workers.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 6.</li> <li>• ILO-IOE 2014, C.11</li> <li>• UNICEF 2013, CRBP 3.</li> </ul>   |  <p>The policy permits <b>safe work</b> and <b>decent working conditions</b> for young workers, if such work exists. <b>(1)</b></p> <p><i>AND</i></p> <p>The policy commits to non-discrimination of young workers in the workplace. <b>(1)</b></p>  |   | Applicable only to enterprises that are legally able to have young workers.<br><br>The provision of decent work to young workers protects them from the risk of age-based discrimination and reduces the likelihood that they must find precarious work such as in the informal economy or in hazardous roles. | <br>Specific |












<sup>1</sup> ILO 2016, Checkpoints for Companies: Eliminating and Preventing Child Labour. At [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms\\_456960.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_456960.pdf)

<sup>2</sup> ILO-IOE 2014, Child Labour Guidance Tool for Business, <https://www.ilo.org/ipecinfor/product/download.do?type=document&id=27555>

<sup>3</sup> UNICEF 2013, Children's Rights in Impact Assessment. At [https://sites.unicef.org/csr/css/Children\\_s\\_Rights\\_in\\_Impact\\_Assessments\\_Web\\_161213.pdf](https://sites.unicef.org/csr/css/Children_s_Rights_in_Impact_Assessments_Web_161213.pdf)








<sup>4</sup> The UNICEF Child Rights in Impact Assessment tool operationalises the Children's Rights and Business Principles. CRBP 'number' indicates which principle is referenced. P§[number] indicates primary criterion; S§ indicates a supplementary criterion.

## Provision 1: Policy commitment on the right of children to be free from child labour

| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type   |
|--|--|--|---|--|
| <b>Criterion 1.1: Content</b><br>The enterprise has a policy and public commitment in regard to the children’s right to be free from child labour and this applies to its operations and business relationships. It puts in place the management systems necessary to implement this policy and commitment.                |  |  |   |  |
|  <p><b>C1.1.4</b><br/>Procedure to <b>check the age</b> of job applicants.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 3.</li> <li>• UNICEF 2013, CRBP 10.</li> </ul>                                |  <p>The enterprise has processes for implementing its child labour or child rights commitment or policy. <b>(1)</b></p> <p><i>AND</i></p> <p>These processes include a procedure to <b>check the age</b> of job applicants. <b>(1)</b></p>  |  | Procedure could be requiring, for example, a birth certificate or other official identification to verify age.  | <br>Specific  |
| <b>Criterion 1.2: Embedding, accountability, resources and decision-making</b><br>In order to take effective action, the right internal decision-making structures need to be in place. The people in the enterprise whose decisions or actions can affect the management of child labour impacts also need to be engaged. |  |  |   |  |
|  <p><b>C1.2.1</b><br/>Alignment with the GBA Human Rights Index.</p>  |  <p>Child labour is included in scope for the enterprise’s human rights due diligence policy and procedures. <b>(1)</b></p> <p><i>AND</i></p> <p>Child rights is included in scope for the enterprise’s human rights due diligence policy and procedures. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise’s supply chain due diligence policy and processes are aligned with <a href="#">OECD 2017 Practical Actions for companies to identify and address the worst forms of child labour in minerals supply chains</a>. <b>(1)</b></p> |  <p>The enterprise verifies that child labour and/or child rights are included in scope for suppliers’ human rights due diligence policies and procedures or where they have a child labour or child rights policy, that these align with the suppliers’ human rights policy. <b>(1)</b></p>  | Where child labour or child rights is in scope for the enterprise’s human rights due diligence process, then all expectations set out in the Battery Passport’s Human Rights Index apply to the issue of child labour or child rights.<br><br>This helps enterprises avoid the burden of responding to specific indicators in the CLI that would seek to ensure that these expectations are being met for child labour or child rights. | <br>Horizontal<br><br>All HuR issue indices must align with the Human Rights Index.   |
|  <p><b>C1.2.2</b><br/>Business partners are aware of the enterprise’s expectations for addressing and eliminating child labour.</p>   |  <p>The enterprise has a document or code that sets out its expectations of how its business partners should conduct child labour due diligence and respect child rights in their operations and supply chains. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise communicates this code of conduct to all its business partners. <b>(1)</b></p>   |  <p>The enterprise has a document or code that sets out its expectations of how its tier 1 suppliers should conduct child labour due diligence and respect child rights in their operations and supply chains. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise communicates this code of conduct to all its suppliers as part of supplier onboarding and contract renewal. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise requires suppliers to adhere to this code of conduct as part of its contractual terms and conditions. <b>(2)</b></p> | The code of conduct could set out the expectations of this index for business partners, including suppliers. By communicating these expectations, the enterprise raises awareness of good practice and can be clear on its terms and conditions where the expectations are classified as contractually required.  | <br>Horizontal<br><br>An enterprise’s supplier code of conduct should set out expectations of how suppliers manage ESG+ issues. |

## Provision 2: Risk and impact assessment

Follow the human rights risk and impact assessment expectations in the Human Rights Index for the purpose of establishing the salience of child labour to the enterprise’s operations, business relationships and supply chains.

| Performance expectation   | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder | Indicator Type   |
|---|---|--|----------------------|--|
| <b>Criterion 2.1: Process</b>   |   |  |                      |  |
|  <p><b>C2.1.1</b><br/>Child labour is included as part of the enterprise’s human rights risk monitoring and assessment.</p> <p>Source: UNICEF 2013, CRBP 10.</p> |     <p>The enterprise <b>includes</b> child labour as part of its ongoing human rights risk monitoring. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise includes child labour as part of any human rights risk assessments that it may undertake. <b>(1)</b></p> <p><i>AND</i></p> <p>This monitoring and/or assessment is gender-responsive. <b>(1)</b></p> |  <p>The enterprise <b>checks</b> its tier 1 suppliers include child labour as part of its ongoing human rights or responsible sourcing risk monitoring and/or any human rights or responsible sourcing risk assessments that they may undertake. <b>(1)</b></p> |                      |  <p>Horizontal</p> <p>Will be included in adapted form in any human rights issue index.</p> |

## Provision 3: Prioritisation, prevention and mitigation

Follow the human rights prioritisation, prevention and mitigation expectations in the Human Rights Index

## Provision 4: Monitoring effectiveness and reporting

Follow the monitoring, tracking and reporting expectations in the Human Rights Index.

## Provision 5: Stakeholder engagement

No core expectations.

## Provision 6: Remediation

Follow the Remediation expectations in the Human Rights Index.



# Additional expectations for enterprises that have identified child labour as a salient issue in their operations, supply chains or business relationships, or where the risk of child labour is medium or high per the UNICEF Children's Rights Atlas.










**Additional expectations** apply either to enterprises where child labour has been identified as a salient issue in an enterprise's operations and/or business relationships, including their supply chains or enterprises operating in or sourcing from areas where the risk of child labour is medium or high according to whichever is higher of the Workplace Index and the Community Index of the [UNICEF Children's Rights Atlas](#)<sup>5</sup>. These expectations are to be implemented only for those sites, suppliers and provenances that have been assessed as medium- or high-risk for child labour. If an enterprise is medium or high risk for child labour in its operations, but not its supply chains, it should do ID1 only. If an enterprise is medium or high risk for its supply chains, but not its operations, it should do ID#2 and the supply chain management systems indicators within ID#1<sup>6</sup>.

---

<sup>5</sup> If a country or jurisdiction is not listed in the UNICEF Child Rights Atlas, the enterprise should treat it as a high risk context for child labour.

<sup>6</sup> For enterprises with medium- or high-risk supply chains only, they are additionally expected to do ID1 for the following performance expectations: A.1.1.6, A.1.1.7, A.1.4.2, A.1.4.3, A.1.4.5, A.2.1.2, A.3.1.11, A.6.1.1

## Provision 1: Policy commitment on the right of children to be free from child labour

| Performance expectation  | Impact Domain 1 Indicators (operations) | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder  | Indicator Type  |
|--|---|---|---|---|
| <b>Criterion 1.1: Content</b><br>The enterprise has a policy and public commitment in regards to the children's right to be free from child labour   |   |   |   |   |
|  <p><b>A1.1.1.</b><br/><b>Statement on the minimum age for employment</b> in line with international minimum standards.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 1.7</li> <li>• ILO-IOE 2014, C1.1.1<sup>8</sup></li> <li>• UNICEF 2013<sup>9</sup>, CRBP<sup>10</sup> 2, P§9.</li> </ul> |   |  <p>The enterprise requires its tier 1 suppliers to have a policy clearly stating the <b>minimum age</b> for employment in line with national law or international minimum standards. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise verifies that its suppliers' minimum age policy applies across suppliers' operations and business relationships, including supply chain. <b>(1)</b></p> <p><i>AND</i></p> <p>Any failure to adhere to the minimum age policy, which is not remedied within the shortest timeframe possible (to be agreed between the parties), leads to the termination of the contractual relationship with the supplier. <b>(1)</b></p> | <p>This expectation may be captured in the supplier code of conduct.</p> <p>Shortest possible timeframe should align with good practice in minerals supply chains of 6 months maximum for high risk operations and provenances, per OECD Minerals Guidance.</p> | <br>Specific   |
|  <p><b>A1.1.2</b><br/>Alignment with international recognised child labour frameworks.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 1.</li> <li>• UNICEF 2013, CRBP 2.</li> </ul>  |   |  <p>The enterprise requires that its tier 1 suppliers have a policy that is aligned with:</p> <ul style="list-style-type: none"> <li>- ILO Conventions 138 and 182. <b>(1)</b></li> <li>- Article 8.7 of the UN SDGs. <b>(1)</b></li> </ul>   |   | <br>Specific  |
|  <p><b>A1.1.3</b><br/><b>Aligning with international standards for the minimum age for employment.</b></p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 1</li> <li>• ILO-IOE 2014, C.1.1</li> <li>• UNICEF 2013, CRBP 2.</li> </ul>   |   |  <p>The enterprise requires its medium- and high-risk tier 1 suppliers to have a policy clearly stating the <b>minimum age</b> for employment in line with national law or international minimum standards, whichever is higher. <b>(1)</b></p> <p><i>AND</i></p> <p>If the supplier doesn't have a policy clearly stating the <b>minimum age</b> for employment in line with national law or international minimum standards, the enterprise supports them to implement one. <b>(1)</b></p> <p><i>AND</i></p> <p>If the supplier doesn't have processes to implement the policy, the enterprise supports them to develop these. <b>(1)</b></p>                  |   | <br>Specific |
















<sup>7</sup> ILO 2016, Checkpoints for Companies: Eliminating and Preventing Child Labour. At [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms\\_456960.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_456960.pdf)

<sup>8</sup> ILO-IOE 2014, Child Labour Guidance Tool for Business, <https://www.ilo.org/ipeinfo/product/download.do?type=document&id=27555>













<sup>9</sup> UNICEF 2013, Children's Rights in Impact Assessment. At [https://sites.unicef.org/csr/css/Children\\_s\\_Rights\\_in\\_Impact\\_Assessments\\_Web\\_161213.pdf](https://sites.unicef.org/csr/css/Children_s_Rights_in_Impact_Assessments_Web_161213.pdf)

<sup>10</sup> The UNICEF Child Rights in Impact Assessment tool operationalises the Children's Rights and Business Principles. CRBP 'number' indicates which principle is referenced. P§[number] indicates primary criterion; S§ indicates a supplementary criterion.















## Provision 1: Policy commitment on the right of children to be free from child labour

| Performance expectation   | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder  | Indicator Type  |
|---|--|---|---|---|
| <b>Criterion 1.1: Content</b><br>The enterprise has a policy and public commitment in regards to the children's right to be free from child labour  |  |   |   |   |
|  <p><b>A11.4</b><br/>Commitment to prevent, mitigate and remediate child labour.</p> <p>The Centre for Child Rights and Business (hereafter referred to as the Centre) 2022 UNICEF 2013.</p> |     <p>The enterprise has a commitment to prevent, mitigate and remediate child labour in its operations, business relationships and supply chains. <b>(1)</b></p>   |  <p>The enterprise requires its tier n medium- and high-risk suppliers for child labour have a commitment to prevent, mitigate and remediate child labour in their operations, business relationships and supply chains. <b>(1)</b></p>  |   | <br>Specific   |
|  <p><b>A11.5</b><br/>Commitment to seek to address the root causes of child labour over where it has agency to do so.</p> <p>CRBP 2012, Principle II Part 25 The Centre 2022</p>             |     <p>The enterprise has a commitment to take actions to help address the root causes of child labour where it has agency to do so whether in its operations, business relationships, supply chains, or communities. <b>(1)</b></p> |   |   | <br>Specific   |
| <p><b>A11.6</b><br/>Safe work and decent working conditions for young workers.</p> <p>ILO-IOE 2014, C.11 ILO 2016, Checkpoint 6.</p>  |  |  <p>The enterprise requires its suppliers to have a policy that:</p> <ul style="list-style-type: none"> <li>permits safe work and decent working conditions for young workers. <b>(1)</b></li> <li>includes a commitment to non-discrimination of young workers in the workplace. <b>(1)</b></li> </ul> <p><b>AND</b><br/>Any failure to include safe work and decent working conditions for young workers in the child labour policy, where applicable, which is not remedied within the shortest timeframe possible (to be agreed between the parties), leads to the termination of the contractual relationship with the supplier. <b>(1)</b></p> | <p>Applicable only to suppliers that are legally able to have young workers.</p> <p>The provision of decent work to young workers protects them from the risk of age-based discrimination and reduces the likelihood that they must find precarious work such as in the informal economy or in hazardous roles.</p> | <br>Specific |

## Provision 1: Policy commitment on the right of children to be free from child labour













| Performance expectation   | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder   | Indicator Type   |
|---|--|--|--|--|
| <b>Criterion 1: Content</b><br>The enterprise has a policy and public commitment in regards to the children's right to be free from child labour  |  |  |  |  |
|  <p><b>A1.1.7</b><br/>Safe work and decent working conditions.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• ILO 2016, Checkpoint 4</li> <li>• UNICEF 2013, CRBP 16b.</li> </ul>                               |     <p>The enterprise clearly defines and categorises hazardous tasks and/or roles in their operations. <b>(1)</b></p> |  <p>The enterprise requires its tier 1 suppliers to clearly define and categorise hazardous tasks and/or roles in their operations.</p>   | See <a href="#">ILO 2016 Checkpoint 4</a> for further guidance.  |  <p>Move to KPI #16 on Workers Health and Safety.</p> |
| <p><b>A1.1.8</b><br/>Alignment with <b>internationally recognised frameworks.</b></p> <p>Source:</p> <ul style="list-style-type: none"> <li>• <a href="#">ILO 2016</a>, Checkpoint 1</li> <li>• ILO-IOE 2014, C.1.1</li> <li>• UNICEF 2013, CRBP 2.</li> </ul>  |  |  <p>The enterprise requires its high-risk tier 1 suppliers to have their policies align with the ILO Conventions 138 and 182 or Article 8.7. <b>(1)</b></p>   |  |  <p>Specific</p>                                      |
|  <p><b>A1.1.9</b><br/>Procedure to <b>check the age</b> of job applicants.</p> <p>Source:</p> <ul style="list-style-type: none"> <li>• <a href="#">ILO 2016</a>, Checkpoint 3.</li> <li>• UNICEF 2013, CRBP 10.</li> </ul> |  |  <p>The enterprise verifies that its tier 1 suppliers describe the processes their personnel must implement to fulfil their child labour or child rights commitment or policy. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise checks that these processes include a procedure to <b>check the age</b> of job applicants. <b>(1)</b></p> | Procedure could be requiring, for example, a birth certificate or other official identification to verify age. |  <p>Specific</p>                                    |

## Provision 1: Policy commitment on the right of children to be free from child labour








| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type   |
|--|--|--|---|--|
| <b>Criterion 1.2: Development and approval</b><br>Development of the policy involves staff in key internal functions, such as procurement and human resources, as well as relevant children's and wider labour rights expertise from inside and outside the enterprise. It can also be helpful to test the statement with relevant business partners to whom it will apply and with representatives of directly affected stakeholders. The involvement of senior leadership in approving the commitment helps signal its importance. |  |  |   |  |
|  <p><b>A1.2.1</b><br/>Consultation with experts in child labour.</p> <p>ILO-IOE 2014, C.1.2<br/>UNICEF 2013, CRBP 1.</p>  |     <p>Internal and/or external experts in the protection of children's rights have been consulted to ensure the development of a robust child labour policy and processes. <b>(1)</b></p>   |  <p>The perspectives of tier n suppliers at high risk of child labour issues have been considered in the development of the policy. <b>(1)</b></p>  | <p>The inclusion of relevant expertise ensures that an understanding of leading practice in the prevention of child labour influences the content of the child labour policy and supporting processes.</p> <p>Relevant expertise may include:</p> <ul style="list-style-type: none"> <li>• ILO country officers</li> <li>• Government agencies, including child protection</li> <li>• Women's organisations</li> <li>• Gender experts</li> <li>• Children's rights experts</li> <li>• (Potentially) affected people, their legitimate representatives or alternatives.</li> <li>• Trade unions and employee representatives</li> <li>• Recognised experts in leading practice in the management of the risk and impacts of child labour in the enterprise's sector and/or communities.</li> </ul>   |  <p>Horizontal</p> <p>Engaging with issue experts can help a business better understand its impacts on rights-holders.</p>            |
| <b>Criterion 1.3 Embedding: accountability, resources and decision-making</b><br>In order to take effective action, the right internal decision-making structures need to be in place. The people in the enterprise whose decisions or actions can affect the management of child labour impacts also need to be engaged.  |  |  |   |  |
|  <p><b>A1.3.1</b><br/>Embedding child labour and child rights throughout the enterprise's <b>human rights due diligence processes.</b></p> <p>UNICEF 2013, CRBP 1, P§1.</p>   |     <p>Child labour is fully integrated into the enterprise's human rights risk management and/or due diligence processes. <b>(1)</b></p> <p><i>AND</i><br/>Child rights is fully integrated into the enterprise's human rights risk management and/or due diligence processes. <b>(1)</b></p> |  <p>The enterprise checks that all its medium and high risk tier n suppliers' have fully integrated child labour into their human rights risk management and/or due diligence processes. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise checks that all its medium and high risk tier n suppliers commit to respecting and supporting the fulfilment of child rights. <b>(1)</b></p> | <p>Enterprises have a responsibility to respect human rights, and thus children's rights, under the UNGPs and the UNICEF Children's Rights and Business Principles.</p> <p>Enterprises can support the fulfilment of children's rights by working in collaboration with duty-bearers, i.e. governments and adults in communities, to reduce the vulnerability of children to the risk of child labour (by addressing root causes), to reduce the likelihood of child labour arising, and to reduce the severity of impacts on children and other affected stakeholders when child labour occurs.</p> <p>When child labour or child rights are a fully integrated part of the enterprise's human rights due diligence processes, then the enterprise applies all criteria in the Human Rights Index to the issue of child labour in its operations and business relationships.</p> |  <p>Horizontal</p> <p>Applies to all human rights issues in the index to ensure the enterprise's HRDD process is comprehensive.</p> |










## Provision 1: Policy commitment on the right of children to be free from child labour

| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder   | Indicator Type   |
|--|---|--|--|--|
| <p><b>Criterion 1.3 Embedding: accountability, resources and decision-making</b></p> <p>In order to take effective action, the right internal decision-making structures need to be in place. The people in the enterprise whose decisions or actions can affect the management of child labour impacts also need to be engaged.</p> |   |  |  |  |
|  <p><b>A1.3.2</b><br/>Developing a roadmap or action plan to address child labour.</p> <p>Source: The Centre 2022.</p>  |  <p>The enterprise has developed its own roadmap or action plan to address child labour in its operations, supply chains and business relationships. <b>(1)</b></p> <p><i>AND</i><br/>The roadmap/action plan is implemented in collaboration with appropriate business partners. <b>(1)</b></p>   |  <p>The enterprise checks that its high-risk tier n suppliers have developed a roadmap or action plan to address child labour in their operations, supply chains and business relationships. <b>(1)</b></p> <p><i>AND</i><br/>It is company policy to support high-risk suppliers to develop such a roadmap where they do not have the capacity to do so alone. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise monitors the implementation of its suppliers' roadmaps as part of its own risk monitoring processes. <b>(1)</b></p> | <p>A roadmap to address child labour would focus on the actions an enterprise can take to meet the targets set out in its child labour policy relating to, for example, ways of reducing the likelihood of child labour, of minimising the severity of impacts of child labour, of strengthening management systems to better mitigate the risks and impacts of child labour, etc.</p> |  <p>Horizontal</p> <p>There should be a roadmap or action plan for addressing each salient risk.</p>                            |
|  <p><b>A1.3.3</b><br/>Assigning responsibility for policy implementation.</p> <p>ILO-IOE 2014, C.3.1<br/>UNICEF 2013, CRBP 1, P§1 and CRBP 4, S§4a.</p>  |  <p>The enterprise has assigned responsibility for implementing the identification, mitigation, prevention and remediation of child labour risks and impacts in its own operations and supply chains to personnel trained in addressing human rights or child labour issues. <b>(1)</b></p>   |  <p>The enterprise checks that tier 1 suppliers have assigned responsibility internally for implementing the identification, mitigation, prevention and remediation of child labour risks and impacts arising in their operations and supply chains. <b>(1)</b></p>  | <p>The responsibility can be for implementation of child labour specifically or part of other policies and procedures, such as human rights or human resources. Responsibility may sit with a staff member or with a representative of a workers or trade union.</p> <p>Responsibility should be assigned through an individual's job description.</p>                                 |  <p>Horizontal:</p> <p>Responsibility for implementing policies must always be assigned to adequately trained individuals.</p> |
|  <p><b>A1.3.4</b><br/>Sufficient internal financial and other resources for implementing the child labour policy and procedures.</p> <p>ILO-IOE 2014, C.3.1<br/>UNICEF 2013, CRBP 4, S§4b<br/>The Centre 2022.</p>                                |  <p>The enterprise has allocated sufficient internal financial and other resources for implementation of the child labour policy and supporting processes and to enable effective responses to the remediation and mitigation of child labour incidents arising in its operations and business relationships. <b>(1)</b></p> <p><i>AND</i><br/>If these funds are not used the enterprise invests the surplus into preventative child labour work in high-risk areas. <b>(1)</b></p> |  <p>The enterprise has allocated sufficient internal financial and other resources for implementation of the child labour policy and supporting processes and to enable effective responses to the remediation and mitigation of child labour incidents arising in its supply chains. <b>(1)</b></p> <p>If these funds are not used the enterprise invests the surplus into preventative child labour work in high-risk areas. <b>(1)</b></p>   | <p>"Sufficient" may be judged by whether or not there is a surplus in available funds at the end of the budget period.</p>   |  <p>Horizontal:</p> <p>No policy can be implemented without allocation of adequate resources.</p>                             |









## Provision 1: Policy commitment on the right of children to be free from child labour

| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder | Indicator Type  |
|--|--|--|----------------------|---|
| <p><b>Criterion 1.3 Embedding: accountability, resources and decision-making</b><br/>                     In order to take effective action, the right internal decision-making structures need to be in place. The people in the enterprise whose decisions or actions can affect the management of child labour impacts also need to be engaged.</p> |  |  |                      |   |
|  <p><b>A1.3.5</b><br/>                     The enterprise trains its personnel to address child labour and respect children's rights.</p> <p>UNICEF 2013, CRBP 1, S\$4c, and P\$5.; CRBP 2.</p>   |     <p>The enterprise or a third-party provides training for its personnel and business partners on how to address child labour in its medium- and high-risk operations and business relationships. <b>(1)</b></p> |  <p>The enterprise checks that its medium- and high-risk suppliers provide and/or have received training on how to address child labour. <b>(1)</b></p> <p><i>AND</i><br/>                     Where medium and high risk tier n suppliers do not have access to training, the enterprise makes training on how to address child labour available to them. <b>(1)</b></p> |                      |  <p>Horizontal: Implementation of ESG policies and processes require training for employees.</p> |









## Provision 2: Risk and impact assessment

| Performance expectation   | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type  |
|---|---|--|---|---|
| <b>Criterion 2.1: Process</b><br>There is a process in place to identify and assess risks and impacts related to underage workers, i.e., to identify where and how girls and boys may be at risk of child labour, within the enterprise's operations and supply chain                 |   |  |   |   |
|  <p><b>A2.1.1</b><br/>Researching the enterprise's exposure to the risk of child labour.</p> <p>ILO-IOE 2014, C.2.1<br/>OECD Minerals Guidance Alignment.</p>  |  <p>Building on its mapping of human rights issues, the enterprise:</p> <ol style="list-style-type: none"> <li>maps which of its operations and business relationships present child labour as a salient risk. <b>(1)</b></li> </ol> <p>AND</p> <ol style="list-style-type: none"> <li>researches and maps the factual circumstances of each operation and business relationship that is red flagged or marked as high-risk for child labour. <b>(1)</b></li> </ol> <p>AND</p> <ol style="list-style-type: none"> <li>researches and maps the prevalence of child labour in its red-flagged and high-risk operating and sourcing environments. <b>(1)</b></li> </ol> <p>The enterprise maps the factual circumstances of each business relationship that is red flagged or marked as high-risk for human rights abuses. <b>(1)</b></p> |  | <p>See performance expectation 2.1.1 in the Human Rights Index.</p> <p>See also 4.1.1.</p> <p>The enterprise researches and maps which of its processes, business units and business relationships present a high risk of child labour. The risk level may be a function of various aspects, such as poor risk controls or a high prevalence of child labour in the operating environment. Mapping risk in operating and sourcing environments may require the use of third party publications and tools such as the UNICEF Children's Rights Atlas.</p> <p>The ILO guides enterprises to "look at the Constitution, child labour laws, regulation and ordinances, forced and bonded labour laws, occupational safety and health laws and regulations, minimum age legislation" to establish the regulatory situation where they and their business partners operate.</p> <p>Enterprises should also seek to understand the prevalence and factual circumstances of child labour through – for example - a.) engagement with relevant government ministries, local authorities, child rights and human rights NGOs, and the country offices of multilateral institutions such as the ILO and UNICEF, b.) desk-based research using reporting from NGOs, CSOs, trade unions, academics, and consultants.</p> |  <p>Horizontal</p> <p>Applies to all human rights issues, but guidance here is specific to child labour.</p> |
|  <p><b>A2.1.2</b><br/>Additional procedures where there is a risk that <b>identification documents</b> may be lacking or forged.</p> <p>ILO 2016, Checkpoint 3<br/>UNICEF 2013, CRBP 2, P§10a.</p> |  <p>In addition to age checking procedures in C1.1.4, the enterprise has established additional procedures for checking the age of workers where there is a risk that identification documents may be lacking or forged. <b>(1)</b></p>  |  <p>The enterprise verifies that its tier 1 suppliers have established additional procedures checking the age of young workers where there is a risk that identification documents may be lacking or forged. <b>(1)</b></p> | <p>This is a delicate area where there is a risk of unacceptable practices and human rights violations in the methods used, which may lead to an unreliability of the methods used, as well as a risk of deceit or inaccuracy by job applicants who may wish to lie about their age to get work.</p> <p>Methods may include:</p> <ul style="list-style-type: none"> <li>cross-checking multiple written documents and affidavits</li> <li>culturally sensitive interviews with employees and applicants who appear to be below the minimum age</li> <li>obtain end of compulsory schooling certificate for those above minimum age</li> <li>Obtain school enrolment certificate for young workers in light work</li> </ul>  |  <p>Specific</p>   |

## Provision 2: Risk and impact assessment

| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type  |
|--|--|--|---|---|
| <b>Criterion 2.1: Process</b><br>There is a process in place to identify and assess risks and impacts related to underage workers, i.e., to identify where and how girls and boys may be at risk of child labour, within the enterprise's operations and supply chain  |  |  |   |   |
|  <p><b>A2.1.3</b><br/>Identifying risks of or use of child labour through the available grievance mechanisms.</p> <p>Source:<br/> <ul style="list-style-type: none"> <li>• UNICEF 2013 P§7.</li> <li>• The Centre 2022.</li> </ul> </p> |  <p>The enterprise has trained child rights focal points within its own business, business partners and third party grassroots organisations or the local community to regularly report observed risks of or use of child labour through the available grievance mechanisms. <b>(1)</b></p>                   |  <p>The enterprise checks that its medium- and high-risk suppliers have child rights focal points that are trained to regularly report observed risks of or use of child labour through the available grievance mechanisms. <b>(1)</b></p> <p><i>AND</i><br/>Where its suppliers do not have such focal points, it supports them to identify, empower and train them. <b>(1)</b></p>  | <p>By empowering people on the ground to communicate their observations, an enterprise can overcome the risk that stakeholders who encounter or experience child labour are unlikely to report this through classical grievance mechanisms.</p> | <br>Horizontal   |
| <b>Criterion 2.2: Root Causes</b><br>The enterprise identifies the root causes of its actual or potential child labour risks and impacts.  |  |  |   |   |
|  <p><b>A2.2.1</b><br/>The enterprise identifies the root causes of its actual or potential child labour risks and impacts and uses this information to support mitigation planning.</p> <p>ILO-IOE 2014, C.4, Hard question #6.</p>     |  <p>The enterprise identifies the root causes of the actual or potential child labour risks and impacts in its operations. <b>(1)</b></p> <p><i>AND</i><br/>in its business relationships. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise bases its mitigation actions upon this information. <b>(1)</b></p> |  <p>The enterprise checks that medium to high-risk suppliers carry out root cause analysis of the actual or potential child labour risks and impacts in their supply chains with suppliers, where possible. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise supports suppliers that need it to do root cause analysis through collaborative assessments. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise bases its mitigation actions upon this information. <b>(1)</b></p> |   | <br>Horizontal<br><br>Prevention and mitigation planning for any ESG issue should be founded on root cause analysis. |





### Provision 3: Prioritisation, prevention and mitigation

| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type   |
|--|---|--|---|--|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children’s rights more broadly.   |   |  |   |  |
|  <p><b>A3.1.1 Living Wage and Living Income.</b></p> <p>UNICEF 2013, CRBP 2, Criterion 13.</p>              |  <p>The enterprise has taken steps to understand what constitutes an adequate living wage for its employees in its country of operation. <b>(1)</b></p> <p><b>AND</b></p> <p>The enterprise has identified and considered what steps can be taken to provide a living wage to employees – enabling families to survive without recourse to child labour – for each country where the business operates where there is a disparity between minimum wage and living wage. <b>(1)</b></p> <p><b>AND</b></p> <p>The enterprise verifies that its business partners are paying a living wage to their workers. <b>(1)</b></p> |  <p>The enterprise checks that its suppliers are paying a living wage to their workers. <b>(1)</b></p> <p><b>AND</b></p> <p>Where they are not, incentivises and facilitates them to do so. <b>(2)</b></p> <p><b>AND</b></p> <p>The enterprise checks if pricing levels for workers who are paid by piece or yield are relatively equivalent to the local living wage. <b>(1)</b></p> | <p>A living wage implies going above minimum wage when minimum wage is not adequate.</p> <p>Where suppliers are not paid with wages but are entrepreneurs (e.g. in small businesses or ASM) then it is important to determine whether pricing is fair, as a basis for the individual to be able to receive a living income. Where pricing levels are relatively equivalent to the local living wage, then a worker selling a day’s worth of material is likely to make amounts equivalent to the daily living wage.</p> <p>Please see <a href="#">Living Wage   UN Global Compact</a> for more information.</p> <p><b>Connection to elimination of child labour:</b><br/> <i>Evidence points to a strong link between household poverty and child labour, and child labour perpetuates poverty across generations by keeping the children of the poor out of school and limiting their prospects for upward social mobility.</i><br/> <a href="https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/child-labour/lang--en/index.htm">https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/child-labour/lang--en/index.htm</a></p> <p><i>Through the provision of a “living wage” or a “living income”, we can ensure that households no longer depend on children’s income from hazardous work.</i></p> |  <p>Move to KPI#14: <i>Justness (Pay, equality, diversity, inclusion)</i></p> |
|  <p><b>A3.1.2 Sick pay, overtime pay and social contributions.</b></p> <p>UNICEF 2013, CRBP 3, S§21a.</p> |  <p>The policy on working conditions stipulates the following payments to all employees:</p> <ul style="list-style-type: none"> <li>• <b>statutory sick pay. (1)</b></li> <li>• <b>overtime pay. (1)</b></li> <li>• <b>social contributions. (1)</b></li> </ul>  |  <p>The enterprise checks that its suppliers’ policies on working conditions stipulate the payment of statutory sick pay, overtime pay, and social contributions to all its employees. <b>(1)</b></p>   | <p><b>Connection to the elimination of child labour</b></p> <p>Social protection, by providing additional sources of regular income and access to health care, or compensating households in the face of economic or health shocks, can effectively reduce the need for households to resort to child labour as a precautionary or coping strategy.<sup>11</sup></p>  |  <p>Move to KPI#14: <i>Justness</i></p>                                     |

<sup>11</sup> The role of social protection in the Elimination of child labor: Evidence Review and policy implications, ILO & UNICEF joint report, p17















## Provision 3: Prioritisation, prevention and mitigation












| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder   | Indicator Type  |
|--|--|---|--|---|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.   |  |   |  |   |
|  <p><b>A3.1.3 Decent working conditions for, parents and caregivers.</b></p> <p>UNICEF 2016, CRBP 3, P§21, supplementary criteria 21c, 21d.</p> |  <p>The enterprise has <b>family-friendly policies</b> for workers with caregiving responsibilities, irrespective of gender. <b>(1)</b></p> <p>AND</p> <p>The enterprise grants <b>parental leave</b> to both male and female employees for newborn, adopted and other dependent children. <b>(1)</b></p> <p>AND</p> <p>The enterprise provides <b>access to day-care</b> for children that are not in school during business hours. <b>(1)</b></p> <p>AND</p> <p>The enterprise extends <b>flexible employment practices</b> to support workers, irrespective of gender, in their roles as parents or caregivers. <b>(1)</b></p> <p>AND</p> <p>The enterprise complies with the provisions of ILO Convention No. 183 on <b>maternity protection</b>, including the international minimum of 14 weeks paid maternity leave, with a compulsory 6-week period after birth. <b>(1)</b></p> |  <p>The enterprise verifies that its tier 1 suppliers and their sub-contractors:</p> <ul style="list-style-type: none"> <li>• Have family friendly policies. <b>(1)</b></li> <li>• Grant parental leave to both male and female employees for newborn, adopted and other dependent children. <b>(1)</b></li> <li>• Provide day-care for children that are not in school during business hours. <b>(1)</b></li> <li>• Extend flexible employment practices to support workers in their roles as parents or caregivers, irrespective of workers. <b>(1)</b></li> <li>• Comply with the provisions of ILO Convention No. 183 on maternity protection, including the international minimum of 14 weeks paid maternity leave with a compulsory 6-week period after birth. <b>(1)</b></li> </ul> | <p>Family friendly policies include measures that seek to ensure policies on working hours and leave allow parents to support their children's schooling, or provide child care support (e.g. after school centres). For example, family friendly policies do not put work meetings on at times when parents would typically be attending to children's needs (wake-up, breakfast, dinner and bed time), or have maternity and paternity policies that attend to parental mental and physical health and wellbeing, etc.</p> <p>Parents or caregivers includes migrant and seasonal workers whose children may be left in their hometown.</p> <p><b>Connection to the elimination of child labour – Family-friendly policies</b><br/> <i>"Family-friendly policies are the measures and arrangements that have a positive impact on workers' abilities to reconcile work and family responsibilities – and advance the development and well-being of children and caregivers. The potential advantages of family-friendly policies include reducing child mortality, and low birthweight, decreasing instances of child abuse, increasing rates of breastfeeding and immunization, enhancing children's cognitive development and school performance, and increased economic empowerment and wellbeing for primary caregivers."</i><sup>12</sup></p> <p><i>The enhancement of school performances and the increase in economic empowerment for the primary caregivers will enable communities to eliminate child labour</i></p> <p><b>Connection to the elimination of child labour – parental leave</b><br/> <i>Paid parental leave provides working parents with time off from work around the birth or adoption of a child with replacement of some or all of their usual earnings. Paid parental leave thus reduces the need to resort to child labour to cope with lack of income following the birth or adoption of a child.</i></p> <p><b>Connection to the elimination of child labour – flexible employment practices</b><br/> <i>Flexible employment practices, if coupled with adequate social protection measures can have a positive impact on the elimination of child labour as it will enable caregivers to care for their children without needing to ask their other children to do this work (depriving them from the opportunity to go to school, for instance) and will ensure that caregivers do not lose their jobs, which could push them to rely on their children's income to support the family.</i></p> <p><b>Connection to the elimination of child labour – Maternity Protection</b><br/> <i>Working women and their families are vulnerable during pregnancy and after child-birth, which can influence decisions on children's education and child labour (ILO 2013). Adequate maternity protection ensures the income security and access to health care that they need to prepare for childbirth and recover and care for new children; preventing their premature return to work while safeguarding their jobs and earnings. Without adequate maternity protection, poor families may resort to child labour to cope with any deprivations, including with the high cost of delivery if maternity care is not provided for free (ILO 2013).</i></p> |  <p>Move to KPI#14: Justness</p> |

<sup>12</sup> WIEGO, UNICEF, and ILO (2021) Family-Friendly Policies for Workers in the Informal Economy. At <https://www.unicef.org/media/102821/file/Family-Friendly%20Policies%20for%20Workers%20in%20the%20Informal%20Economy%20.pdf7>. Accessed 6th December 2022.








## Provision 3: Prioritisation, prevention and mitigation

| Performance expectation   | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder   | Indicator Type   |
|---|---|---|--|--|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.  |   |   |  |  |
|  <p><b>A3.1.4</b><br/>Protective measures for maternal health in the workplace.</p> <p>UNICEF 2013, CRBP 3, S§21b.</p> |  <p>The policy on working conditions outlines protective measures for maternal health in the workplace. <b>(1)</b></p>   |  <p>The enterprise verifies that its tier 1 suppliers' policy on working conditions outlines protective measures for maternal health in the workplace. <b>(1)</b></p>  | <p>Protective measures for maternal health in the workplace may include:</p> <ul style="list-style-type: none"> <li>• Prohibition of discrimination in hiring pregnant women</li> <li>• Prohibition of pregnancy testing in hiring</li> <li>• Need to assess and adjust tasks during the pregnancy period</li> <li>• Ensuring training, protective equipment and regular health checks for all employees who handle chemicals or other materials potentially hazardous to their reproductive health.</li> </ul> <p>Removal of pregnant workers from any work environment that may threaten their health and relocation to a safer environment through the duration of pregnancy and while breastfeeding.</p> |  <p>Move to KPI#16: Workers Health and Safety</p> |
|  <p><b>A3.1.5</b><br/>Health and Safety for young workers.</p> <p>UNICEF 2013, CRBP 3.</p>                             |  <p>The enterprise has a mechanism in place for supervision of young workers, with clear instructions on how to perform tasks safely and effectively. <b>(1)</b></p>   |  <p>The enterprise verifies that its tier 1 suppliers have a mechanism in place for supervision of young workers, with clear instructions on how to perform tasks safely and effectively if applicable. <b>(1)</b></p> | <p>A young worker is a child between the ages of the legal minimum age for employment and 18 that are engaged in youth employment.</p> <p><i>Only applicable where an enterprise has young workers in its labour force.</i></p>  |  <p>Move to KPI#16: Workers Health and Safety</p> |
|  <p><b>A3.1.6</b><br/>Recording young workers.</p> <p>UNICEF 2013, CRBP 3, P§18.</p>                                 |  <p>The enterprise identifies and maintains up-to-date records of all young workers and their task allocations. <b>(1)</b></p> <p><i>AND</i><br/>It does this with the involvement of workers' representatives or trade unions. <b>(1)</b></p> |  <p>The enterprise verifies that its tier 1 suppliers identify and maintain up-to-date records of all young workers and their task allocations. <b>(1)</b></p>   | <p>These indicators are seeking to ensure that the enterprise has clear procedures in place for how to prevent, identify and address any alleged violations of a young worker's labour rights.</p> <p><i>Only applicable where an enterprise has young workers in its labour force.</i></p>  |  <p>Move to a new KPI on Decent Work?</p>       |













## Provision 3: Prioritisation, prevention and mitigation

| Performance expectation   | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder   | Indicator Type  |
|---|---|---|--|---|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.  |   |   |  |   |
|  <p><b>A3.1.7</b><br/>Decent working conditions for young workers.</p> <p>ILO 2016, Checkpoint 4<br/>ILO-IOE 2014, B.2<br/>UNICEF 2013, CRBP 3, Primary criteria 16, 18.</p> |  <p>The enterprise carries out a young persons' risk assessment to determine what jobs can be safely performed by young workers. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise has a list of job functions that can safely be performed by young workers. <b>(1)</b></p>   |  <p>The enterprise verifies that its tier 1 suppliers have a list of job functions that can safely be performed by young workers. <b>(1)</b></p>   | <p>Young person's risk assessments should include but not depend upon any available nationally determined "hazardous work list".</p> <p><i>Only applicable where an enterprise has young workers in its labour force.</i></p> <p><b>Connection to the elimination of child labour</b><br/><i>Since 2015, the NGO, Pact, has been working to train 950 adolescent miners in alternative trades to artisanal mining. Pact, members of the communities and companies (including mining companies) identified alternative and appropriate jobs for adolescents which were needed by the companies. As a result, several graduate apprentices have been hired by mining companies to carry out jobs which can be safely performed by young workers (mostly in welding, making sure adolescents are properly trained, supervised and wear protective equipment). If adolescent miners know they can be hired by companies if they have the adequate skills, this constitutes a huge incentive for them to leave the artisanal mines, and earn a stable income in a safe environment.</i></p> |  <p>Move to a new KPI on Decent Work?</p> <p>Or KPI#28: Local suppliers and employment</p> |
|  <p><b>A3.1.8</b><br/>Training for young workers.</p> <p>UNICEF 2013, CRBP 3, S§18d.</p>   |  <p>The enterprise provides training for young workers on their rights and the training includes how to access and use the grievance mechanism. <b>(1)</b></p>   |  <p>The enterprise verifies that its tier 1 suppliers provide training for young workers on their rights and the training includes how to access and use the grievance mechanism. <b>(1)</b></p> |  |  <p>Specific</p>   |
|  <p><b>A3.1.9</b><br/><b>Planning to support the elimination of child labour.</b></p> <p>UNICEF 2013, CRBP 2<br/>The Centre 2022.</p>                                      |  <p>The enterprise has contributed to the development of a roadmap/action plan to address the root causes of child labour in its communities and sector, by working in collaboration with other stakeholders. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise is involved in implementation of this roadmap/ action plan. <b>(1)</b></p> |   | <p>By contributing to the development and implementation of a road map to address the root cause(s) of child labour, working with national/ local authorities, state services, communities, child protection experts, civil society organisations (including those working on gender) and other companies from the region, the enterprise can participate in the development of a concerted and sustainable response to child labor.</p>   |  <p>Move to KPI #27: Contribution to Local Economic Development</p>                      |

## Provision 3: Prioritisation, prevention and mitigation














| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder  | Indicator Type   |
|--|---|---|---|--|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.   |   |   |   |  |
|  <p><b>A3.1.10</b><br/><b>Taking action to prevent and address harms broadly in local communities.</b></p> <p>Source: UNICEF 2013 CRBP 2, P§14; CRBP 20, Primary Criteria 57.</p> |     <p>The enterprise can demonstrate that it invests in local initiatives near its operations that address the root causes of child labour that are related to company activity. <b>(1)</b></p> <p><b>AND</b></p> <p>The enterprise supports local stakeholders to fulfil children's rights more broadly by supporting or investing in local initiatives in its communities/ operating environment, even where direct linkage to company activity is not known. <b>(1)</b></p> |  <p>The enterprise can demonstrate that it prioritises investments in community activities that address the root causes of child labour in its sourcing communities. <b>(1)</b></p> <p><b>AND</b></p> <p>Working with its suppliers, the enterprise supports local stakeholders to fulfil children's rights in its supply chains by supporting or investing in local initiatives. <b>(1)</b></p> | <p>In cases of direct linkage, investments in local initiatives to address the root causes of child poverty will likely be the primary way for enterprises to prevent and address harms.</p> <p>In cases of indirect linkage, the enterprise may choose to support or invest in local initiatives that address the root causes of child labour generally, but which may have no relation to company activities, e.g. playfields, child or maternal health, women's empowerment etc.</p> <p>Example actions companies may take to prevent and address harms broadly include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Improving access to water/electricity/etc.</li> <li>• Building or providing equipment for health care/educational facilities</li> <li>• Improving provision of social welfare, including health care / educational facilities / care for the elderly, infirm, women-headed or orphan-headed household</li> <li>• Rehabilitating abandoned mine sites so they can be used by communities: rehabilitation: plant food trees/play fields for children</li> <li>• Empowering women</li> <li>• Any other locally applicable action that addresses the root causes of child labour.</li> </ul> <p><b>Connection to the elimination of child labour</b></p> <p><i>Improved access to basic services (water, electricity, health care, educational facilities, etc) will: 1) decrease costs to access those services for the household; 2) decrease time dedicated to accessing those services; 3) improve the health of community members.</i></p> <p><i>Access to educational facilities helps increase the educational offer, and (hopefully) the quality of education. Access to healthcare facilities helps reduce the impact of illness or accidents on adults' ability to work, so reducing the need for income from child labour.</i></p> <p><i>An increase in recreational activities ensures children do not start working at mining sites because there is nothing else to do in the community.</i></p> <p><i>Planting food trees can increase nutritional intake as well as communities' revenues, so reducing the need to depend on children's income.</i></p> <p><i>Empowering women increases household income, reduces infant mortality rates and ultimately helps children go to school and stay in school longer</i></p> |  <p>Move to KPI #27: Contribution to Local Economic Development</p> |

## Provision 3: Prioritisation, prevention and mitigation







| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder   | Indicator Type  |
|--|--|---|--|---|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.   |  |   |  |   |
|  <p><b>A3.1.11</b><br/>Participation in multistakeholder initiatives to address and eliminate child labour.</p> <p>ILO-IOE 2014, C.4, Hard question #5.</p>   |  <p>The enterprise is a member of multistakeholder, joint or industry initiatives that create on-the-ground changes that have demonstrated positive impacts on child rights, including to address and eliminate child labour, whether in their operating or sourcing environments. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise participates actively in this initiative, e.g. as a contributing member of working groups, expert panels, advocacy work, etc. <b>(1)</b></p> |  <p>The enterprise has successfully incentivised a supplier to either become a member of a multistakeholder, joint or industry initiative dedicated to addressing and eliminating child labour, or to gain support from a specialized NGO or governmental organization. <b>(1)</b></p>               | <p>There is a range of multistakeholder, joint and industry initiatives that work on preventing and remediating child labour in battery supply chains. Industry can support these initiatives in multiple ways, through contributing time, expertise, money, or use of other assets to facilitate these initiatives' programmes and increase their likelihood of success.</p>  |  <p>Horizontal:</p> <p>Participation in MSIs oriented at eliminating an enterprise's most salient or significant ESG issues leading practice, but will be particular for each ESG issue.</p> <p>Relates to MS Index: Participation and Inclusion</p> |
|  <p><b>A3.1.12</b><br/><b>Working with authorities</b> to remove barriers to eliminating child labour.</p> <p>UNICEF CRBP 2, Supplementary Criteria 14b, 15a.</p>                                     |  <p>The enterprise engages with local and/or national authorities to understand and remove the barriers to eliminating child labour. <b>(1)</b></p>   |  <p>The enterprise engages with local and/or national authorities in its medium- and high-risk supply chains to understand and remove the barriers to eliminating child labour. It does this either directly, or with or through its suppliers or multistakeholder/joint initiatives. <b>(1)</b></p> | <p>Where possible, the enterprise should take steps to support government efforts to prevent and address child labour, such as:</p> <ul style="list-style-type: none"> <li>• government approach to protecting children from child labour, and related policies and initiatives</li> <li>• national action plans and legal reform processes for the elimination of child labour</li> <li>• identify ways the enterprise can support these plans in ways that strengthen institutions and avoid any risks of corruption or bribery.</li> </ul>  |  <p>Move to KPI #27: Contribution to Local Economic Development</p>  |
|  <p><b>A3.1.13</b><br/>Taking specific actions to <b>support the broader community, industry, and national and international efforts</b> to eliminate child labour.</p> <p>UNICEF 2013, CRBP 2.</p> |  <p>The enterprise works with NGOs, CSOs and women's organisations to implement projects to address child labour in parts of its operations with a high risk of child labour. <b>(1)</b></p>  |  <p>The enterprise works with NGOs, CSOs and women's organisations to implement projects to address child labour in parts of its supply chain with a high risk of child labour. <b>(1)</b></p>   | <p>Relevant projects include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Awareness-raising on the negative effects of child labour in mining, on children's rights, and/or on parental responsibilities and adult and state duty to protect</li> <li>• Economic empowerment of vulnerable families who are sending or are at risk of sending their children to work at mine sites</li> <li>• Improved access to education for children who are not enrolled in schools/working part time at mine sites to pay for school fees and material</li> <li>• Any other locally applicable action that either reduces the likelihood or severity of child labour risks or impacts</li> <li>• Economic empowerment of vulnerable families and in particular of women</li> <li>• Cash transfer / child allowance support programmes.</li> </ul> |  <p>Move to KPI #27: Contribution to Local Economic Development</p>  |







## Provision 3: Prioritisation, prevention and mitigation

| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type   |
|--|--|--|---|--|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.   |  |  |   |  |
|  <p><b>A3.1.14 Promoting economic diversification and employment opportunities for youth.</b></p> <p>ILO 2016, Checkpoint 14. UNICEF 2013, Primary Criteria 17, 19.</p>                           |     <p>The enterprise works directly with vocational education training structures to train community youth in trades which are in high demand in the community or in high demand in the relevant industry. <b>(1)</b></p>   |  <p>The enterprise checks that its suppliers take steps to promote economic diversification and employment of youth. For example they work directly with vocational education training structures to train community youth (with particular attention to girls) in trades which are in high demand in the community or in high demand in the relevant industry. <b>(1)</b></p> <p><b>AND</b></p> <p>The enterprise works with its suppliers to proactively offer vocational training and decent work opportunities to youth (with particular attention to girls) in trades which are in high demand in the community or in high demand in the relevant industry. <b>(1)</b></p> | <p>This expectation pertains to youth and not just young workers, i.e. people aged between 15 and 24.</p> <p>Efforts to support employment opportunities for youth must be gender-responsive, and pay particular attention to girls.</p> <p>It is however important to implement a mechanism that will enable young workers to earn a minimum daily income, which they can bring back home, to make up for the loss of income from mining activities.</p> <p><b>Connection to the elimination of child labour</b><br/> <i>NGO, Pact, has been working since 2015, to train 950 adolescent miners in alternative trades to mining. While monitoring has not been possible for all of them, out of 123 who graduated from the programme in Oct 2021, none have gone back to mining and 95% are currently working in the trade they learnt, including 22 who have resumed school. Average monthly earning is above \$100 and many are paying for their siblings' school fees and contributing to household income. Also, many are teaching their trade to their friends/siblings with whom they used to work in the mines.</i></p> |  <p>Move to KPI#27: Contribution to local economic development</p>              |
|  <p><b>A3.1.15 Approaching social investment</b> in ways that consider how the most vulnerable children in a community will be supported.</p> <p>UNICEF 2013, CRBP 2, S§14c; CRBP 10, P§57.</p> |     <p>The enterprise consults the community when planning social investment. <b>(1)</b></p> <p><b>AND</b></p> <p>The enterprise considers how its social investment projects will support the most vulnerable girls and boys in the community. <b>(1)</b></p> |  | <p>See UNICEF 2013, CRBP 10 for more guidance.</p> <p><b>Connection to the elimination of child labour</b><br/> <i>This leading practice will help ensure that the social investment planned by the enterprise is in line with the communities' realities, priorities &amp; needs regarding the elimination of child labour.</i></p>  |  <p>Move to KPI#27: Local Economic Development</p> <p>or KPI#14: Justness</p> |

## Provision 3: Prioritisation, prevention and mitigation















| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains) | Guidance Placeholder  | Indicator Type  |
|--|---|---|---|---|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.   |   |   |   |   |
|  <p><b>A3.1.16</b><br/>The enterprise <b>supports skills development</b> of youth through apprenticeships and training.</p> <p>ILO 2016, Checkpoint 14<br/>UNICEF 2013, P§19.</p> |     <p>Apprenticeships and training programmes are implemented in line with good practices, as identified by the International Labour Organization, for providing quality apprenticeship programmes that bridge training to productive and decent work. <b>(1)</b></p> <p><i>AND</i><br/>There is a gender quota for these programmes. <b>(1)</b></p> |   | <p>This generates youth employment.</p> <p>Examples of good practices in provision of quality apprenticeships and training include:</p> <ul style="list-style-type: none"> <li>• Apprenticeships organized within industry sectors by tripartite bodies (government, employers' organizations and trade unions)</li> <li>• Identifying training needs</li> <li>• Curricula</li> <li>• Apprenticeship standards</li> <li>• Mechanisms for assessing learning outcomes.</li> </ul> <p>It is important to implement a mechanism that will enable young workers to earn a minimum daily income, which they can bring back home, to make up for the loss of income from mining activities.</p> <p><b>Connection to the elimination of child labour</b><br/><i>When young workers (and their caregivers) know they have opportunities to build their skills and gain experience working formally, in better conditions that at the mining site, then they tend to want to leave informal employment, like artisanal mining.</i></p> |  <p>Move to KPI#28: Local suppliers and employment</p> |

## Provision 3: Prioritisation, prevention and mitigation









| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder   | Indicator Type  |
|--|---|--|--|---|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.   |   |  |  |   |
|  <p><b>A3.1.7</b><br/>Recognising that child labour is prevalent in artisanal and <b>small-scale mining</b>, the formalisation of ASM can reduce the likelihood and severity of child labour incidents.</p> |  <p>Enterprises interacting with ASM (e.g. ASM-adjacent large-scale miners) where child labour is known to occur, implement 'ASM strategies' to engage with and support ASM miners and communities in appropriate ways. <b>(2)</b></p> <p>AND</p> <p>In so doing, pays particular attention to structural inequalities between different genders and social groups. <b>(1)</b></p> |  <p>Enterprises sourcing directly from ASM (e.g. refiners, traders) where child labour is known to occur, implement 'ASM strategies' to engage with and support ASM miners and communities in appropriate ways. <b>(2)</b></p> <p>When sourcing indirectly from ASM where child labour is known to occur, or, when sourcing directly from a supplier that interacts with ASM (e.g. large scale miners), the enterprise</p> <ul style="list-style-type: none"> <li>• Checks that the supplier sourcing directly/ interacting with the ASM organisations is implementing ASM strategies. <b>(1)</b></li> <li>• Supports them in doing so. <b>(1)</b></li> <li>• Directly supports or participates in relevant ASM initiatives. <b>(1)</b></li> </ul> <p>AND</p> <p>In so doing, the enterprise pays particular attention to structural inequalities between different genders and social groups. <b>(1)</b></p> | <p>For enterprises sourcing directly from ASM or interacting with ASM where child labour is known to occur, appropriate actions for ASM Strategies may include:</p> <ul style="list-style-type: none"> <li>• Mapping and understanding the ASM operations and communities</li> <li>• Ongoing engagement with ASM miners and communities</li> <li>• Supporting ASM with institutional strengthening, professionalisation and / or formalisation</li> <li>• Improving working conditions for ASM, e.g. overburden removal, training, provision of equipment or services that reduce hazardous work</li> <li>• Incorporating ASM related issues into risk and impact assessment and management</li> <li>• Ensuring that any security activities respect the human rights of ASM</li> <li>• Fostering partnerships with ASM which can include providing knowledge, technical equipment, improved access to health services on site, providing access to markets and/or purchase ASM minerals (at prices that support a living income)</li> <li>• Supporting the creation of alternative livelihoods and income sources</li> <li>• Developing programmes targeting ASM communities to keep children in school (e.g., school holiday programmes, free meals)</li> <li>• Investing and participating in joint initiatives to support ASM miners and communities</li> <li>• Investment in joint initiatives to support the formalization of ASM where child labour is known to occur or there is a high or medium risk of its occurrence.</li> </ul> <p>Appropriate actions for enterprises sourcing indirectly from ASM where child labour is known to occur, or, when sourcing directly from a supplier that interacts with ASM (e.g. large scale miners), may include:</p> <ul style="list-style-type: none"> <li>• Monitoring the actions (listed above) from the ASM strategies</li> <li>• Engaging, supporting or investing in ASM partnerships and joint initiatives to support ASM miners and communities.</li> </ul> <p><b>Connection to the elimination of child labour</b><br/><i>Actions that increase the income and health and safety of ASM reliant families, reduce the need for them to depend on children's work and income. The most effective approaches – or combination of approaches -for doing this will vary depending on particular ASM scenarios. In some cases, this can be achieved by developing alternative livelihoods for ASM communities; this can also boost the development of businesses at community level. In other cases this can be through professionalization and formalization of the ASM mining. This can enable amongst other things, the reduction of OHS risks, an increase in ASM operators' productivity, and an increase in ASM operators' likelihood of receiving a fair price for their minerals (including women miners). Also, when formalization is coupled with awareness raising and specific measures to ensure children cannot enter mining sites, then the risk of child labour decreases further (for more information on this, please refer to Mutoshi Cobalt impact evaluation report).<sup>13</sup></i></p> |  <p>Move to KPI#28: Local suppliers and employment</p> |

<sup>13</sup> [https://www.trafigura.com/media/2433/2019\\_trafigura\\_the\\_mutoshi-pilot\\_project.pdf](https://www.trafigura.com/media/2433/2019_trafigura_the_mutoshi-pilot_project.pdf)

### Provision 3: Prioritisation, prevention and mitigation

| Performance expectation   | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder                         | Indicator Type  |
|---|--|--|--|---|
| <b>Criterion 3.1 Address root causes</b> through the fulfilment of children's rights more broadly.  |  |  |  |   |
|  <p><b>A3.1.18</b><br/>Supporting <b>children's education</b>.</p> <p>ILO 2016, Checkpoint 14.</p> |     <p>The enterprise invests in programmes to support free, easy, and/or safe access to education for children of its workers or in its communities. <b>(1)</b></p> <p>AND<br/>This programme privileges support to vulnerable girls and boys. <b>(1)</b></p>             |  <p>The enterprise invests in programmes to support free, easy, and safe access to education for children in its supply chain communities where child labour is prevalent. <b>(1)</b></p> |  |  <p>Move to KPI#27: Local Economic Development</p> |
|  <p><b>A3.1.19</b><br/>Supporting <b>children's feeding programmes</b></p>                         |     <p>The enterprise invests in programmes to support free, easy and/or safe access to feeding programmes for the children of its workers or in its communities. <b>(1)</b></p> <p>AND<br/>This programme privileges support to vulnerable girls and boys. <b>(1)</b></p> |  <p>The enterprise invests in programmes to support free, easy and/or safe access to feeding programmes for the children in its supplier communities. <b>(1)</b></p>                      | ID#2 may be scored if it's in one community. |  <p>Move to KPI#27: Local Economic Development</p> |









## Provision 4: Monitoring effectiveness and reporting

| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type  |
|--|---|--|---|---|
| <p><b>Criterion 4.1: Monitoring, performance tracking and verification</b><br/>           To verify whether child labour impacts are being addressed, companies monitor and track the effectiveness of their outcomes. This includes both qualitative and quantitative indicators, as well as feedback from both internal and external information sources, including affected stakeholders<sup>14</sup></p>   |   |  |   |   |
|  <p><b>A4.1.1</b><br/> <b>Monitoring trends</b> in child labour.</p> <p>ILO 2016, Checkpoint 18.<br/>           ILO-IOE 2014, C.4<br/>           UNICEF 2013, CRBP 2, P§10.</p>   |  <p>The enterprise monitors the prevalence, rates, and trends of child labour in its high-risk operating environments and communities, paying particular attention to 'red flags'. <b>(1)</b></p>  |  <p>The enterprise monitors the prevalence, rates, and trends of child labour in its high-risk supply chains, paying particular attention to 'red flags'. <b>(1)</b></p>  | <p>Red flags that may indicate a high probability of child labour are indicated in UNICEF 2013, CRBP 2, P§10, as follows:</p> <ul style="list-style-type: none"> <li>• “age of school completion is not the same as the legal working age;</li> <li>• “high risk or incidence of child labour in the area, country or region;</li> <li>• “high levels of labour migration;</li> <li>• “low availability of schooling, low quality of schooling, and low levels of school enrolment and education completion;</li> <li>• “poverty and prevalence of informal economy;</li> <li>• “weak legal systems, policies and institutions.”</li> </ul> <p>Red flags that can be derived from supply chain monitoring or audits may include:</p> <ul style="list-style-type: none"> <li>• “supplier’s recruitment process is not described sufficiently in countries that are considered high-risk</li> <li>• “level of supplier’s compliance maturity level</li> <li>• “change of factory or facility management”</li> </ul> <p>Another red flag would be an absence of policies in managing human rights risks, modern slavery, child rights, or decent working conditions.</p> |  <p>Horizontal</p> <p>Specific guidance provided.</p>  |
|  <p><b>A4.1.2</b><br/> <b>Monitoring and verifying effectiveness</b> of child labour management systems using diverse tools and systems, including independent monitoring and third-party verification.</p> <p>ILO-IOE 2014, C.4<br/>           OECD Minerals Guidance, Step 4.<br/>           UNICEF 2013, CRBP 1, P§6;<br/>           CRBP 2, P§11;<br/>           CRBP 4, P§24<br/>           EU CSDDD Article 11.</p> |  <p>The enterprise tracks the effectiveness of corrective and preventative actions intended to address child labour in its operations and business relationships. This includes but is not limited to assessing the effectiveness of its roadmap/action plan to address root causes. <b>(2)</b></p> <p><i>AND</i><br/>           The enterprise uses a cohesive and comprehensive system of tools to track the effectiveness of its efforts to prevent and address child labour impacts in its own operations and business relationships. <b>(1)</b></p> <p><i>AND</i><br/>           These tools and systems include third party verification of the effectiveness of the enterprise’s child labour due diligence systems. <b>(1)</b></p> <p><i>AND</i><br/>           The enterprise analyses whether and how its child labour risk management systems are effectively and efficiently addressing the reasons for child labour in its operations and business relationships. <b>(2)</b></p> <p><i>AND</i><br/>           The enterprise can demonstrate how the outcomes of this performance tracking have influenced improvements in its child labour due diligence processes. <b>(1)</b></p> |  <p>The enterprise periodically tracks the effectiveness of its tier 1 suppliers’ actions to correct and prevent child labour in their operations and supply chains. <b>(1)</b></p> <p><i>AND</i><br/>           The enterprise involves suppliers in its performance tracking and analysis of trends identified through its child labour incident monitoring, resolution, remediation, reporting and general management of child labour risks in its supply chains. <b>(2)</b></p> | <p>Performance tracking may be done through the enterprise’s human rights monitoring system, its responsible sourcing monitoring system, or a dedicated child labour monitoring system. It may also be done as part of risk assessment.</p> <p>Tools and systems that support monitoring may include:</p> <ul style="list-style-type: none"> <li>• Record keeping and tracking of incidents of child labour by gender, age, and other relevant identities including how many of the child labour cases have been referred to child protection or similar services, what sort of support had been provided</li> <li>• Periodic review processes</li> <li>• Human Rights Working Group with incident monitoring and management functions</li> <li>• Internal audits</li> <li>• Systems to track occupational health and safety risks by age and gender</li> <li>• Engagement with representative experts (e.g. trade unions and civil society organisations) or affected people</li> <li>• Surveys of employees or external stakeholders to identify what is and is not working, and the outcomes of its efforts, with a gender quota.</li> </ul>                       |  <p>Horizontal</p> <p>Specific guidance provided</p> |




<sup>14</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)



## Provision 4: Monitoring effectiveness and reporting





| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder  | Indicator Type   |
|--|---|---|---|--|
| <b>Criterion 4.2: Reporting and communication</b><br>Companies are prepared to communicate about their efforts to prevent and mitigate child labour  |   |   |   |  |
|  <p><b>A4.2.1 Reporting publicly.</b></p> <p>ILO-IOE 2014, C.5.1<br/>OECD Minerals Guidance, Step 5.<br/>OECD 2017 §1.4<br/>UNICEF 2013, CRBP 2, P§6.</p> |  <p>The enterprise reports publicly on</p> <ul style="list-style-type: none"> <li>• how it addresses child labour. <b>(1)</b></li> <li>• the effectiveness of its risk management systems. <b>(1)</b></li> </ul> <p><i>AND</i></p> <p>The enterprise reports on its child labour risks and impacts in alignment with the Global Reporting Initiative framework: “Children’s Rights in Sustainability Reporting”. <b>(1)</b></p> <p><i>AND</i></p> <p>This reporting is gender-responsive. <b>(1)</b></p> <p><i>AND</i></p> <p>Children’s safety, privacy and identities are protected throughout reporting. <b>(1)</b></p> |  <p>The enterprise verifies that its high-risk suppliers are formally and publicly reporting on how they address child labour and/or child rights impacts, on the effectiveness of their child labour risk management systems, and in ways that are gender-responsive. <b>(1)</b></p> <p><i>AND</i></p> <p>Where this is not the case:</p> <ol style="list-style-type: none"> <li>1. The enterprise encourages its high-risk suppliers to formally and publicly report on child labour. <b>(1)</b></li> </ol> <p><i>AND</i></p> <ol style="list-style-type: none"> <li>2. The enterprise requires its tier 1 suppliers to report to it on how they address child labour issues in their operations and supply chains, on the effectiveness of their child labour risk management systems, and in ways that are gender-responsive. <b>(1)</b></li> </ol> <p><i>AND</i></p> <ol style="list-style-type: none"> <li>3. The enterprise supports its small-scale suppliers in their reporting either directly (making internal resources available) or indirectly (financing 3rd party support on due diligence). <b>(1)</b></li> </ol> | <p>Global Reporting Initiative (GRI) framework: ‘Children’s Rights in Sustainability Reporting’, <a href="http://www.unicef.org/csr/148.htm">www.unicef.org/csr/148.htm</a>.</p> <p>Gender responsive reporting means at a minimum disaggregating data by gender and being explicit on the specific impacts on girls and other marginalised genders.</p>  |  <p>Horizontal</p> <p>Enterprises should report on their salient or significant ESG issues in ways that are appropriate to ensuring transparency as to their identification, prevention, mitigation, remediation and the effectiveness of their management systems.</p> |
|  <p><b>A4.2.2 Comprehensive reporting.</b></p> <p>UNICEF 2013, CRBP 2, P§6.</p>   |  <p>Formal communications by the enterprise include the following.</p> <ol style="list-style-type: none"> <li>1. Child labour incidents arising, where applicable. <b>(2)</b></li> <li>2. Child labour risk management systems. <b>(2)</b></li> <li>3. Information or observations from internal and external stakeholders. <b>(1)</b></li> </ol>  |  <p>The enterprise requests its suppliers to report on child labour incidents arising, where applicable; child labour risk management systems; and information or observations from internal and external stakeholders. <b>(1)</b></p> <p><i>AND</i></p> <p>The enterprise helps them to build the capacity to do this reporting, where required. <b>(1)</b></p>   | <p>Child labour incidents arising includes</p> <ol style="list-style-type: none"> <li>1. Child labour rates or prevalence and trends, including a typology of child labour (e.g. disaggregated by light or hazardous work, etc.)</li> <li>2. Child labour incident closure rates and trends</li> <li>3. Corrective actions taken (in a non-attributable way)</li> </ol> <p>Internal and external stakeholders includes but may not be limited to affected people and their legitimate representatives, and independent third parties. Inclusion of information or observations from these stakeholders may help to increase the credibility of the report.</p> <p>Child labour risk management systems</p> <ol style="list-style-type: none"> <li>1. Improvements</li> <li>2. Preventative actions</li> <li>3. Leverage used</li> </ol> |  <p>Horizontal</p>  |

## Provision 4: Monitoring effectiveness and reporting








| Performance expectation  | Impact Domain 1 Indicators (operations) | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder | Indicator Type  |
|--|---|--|----------------------|---|
| <b>Criterion 4.2: Reporting and communication</b><br>Companies are prepared to communicate about their efforts to prevent and mitigate child labour  |   |  |                      |   |
|  <p><b>A4.2.3</b><br/> <b>Not accepting incident data</b><br/>           at face value.</p> <p>The Centre 2022<sup>15</sup></p> |   |  <p>Where the enterprise has not recorded any child labour incidents despite sourcing from high-risk areas, it carries out or commissions research and exchange with child rights experts to ascertain if there are reasons to believe its grievance and monitoring systems may not be adequate and what can be done to resolve this <b>(1)</b></p> |                      |  <p>Specific</p> |

<sup>15</sup> Child Rights Stress Test on v0.3 of the CLI, 13th August 2022 – The Centre for Child Rights in Business

## Provision 5: Stakeholder engagement





| Performance expectation   | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder  | Indicator Type   |
|---|---|---|---|--|
| <p><b>Criterion 5.1: Engaging all relevant stakeholders for all aspects of child labour due diligence</b><br/>           Companies should engage with relevant stakeholders about their efforts to prevent and mitigate child labour, including engagement about potential child labour risks and impacts. There should be a special focus on engaging vulnerable or marginalised groups (including women and girls) that may be impacted by an enterprise's operations, business relationships or supply chains.</p> |   |   |   |  |
|  <p><b>A5.1.1 Engaging relevant stakeholders</b><br/>           for all aspects of child labour due diligence.</p> <p>ILO-IOE 2014, C.6.2.</p>   |  <p>The enterprise follows expert guidance when designing or conducting any engagement with potentially affected children or their families. Where such engagement is not possible, the enterprise considers consulting with credible proxies for children's views. <b>(1)</b></p> <p><i>AND</i><br/>           The enterprise identifies and engages other relevant stakeholders about child labour risks in its operations. <b>(1)</b></p> <p><i>AND</i><br/>           Stakeholders themselves can initiate engagement with the enterprise. <b>(1)</b></p> <p><i>AND</i><br/>           Learnings from engagement with experts or stakeholders is taken into account in enterprise decision making on how to address child labour issues in its operations and business relationships. <b>(1)</b></p> |  <p>The enterprise identifies and engages with relevant stakeholders who may help it identify, prevent, mitigate and remedy child labour in its medium- and high-risk supply chains, including where they identify child labour issues in their supply chains <b>(1)</b></p> <p><i>AND</i><br/>           Learnings from this engagement is taken into account in enterprise decision making on how to address child labour in its supply chains. <b>(1)</b></p> | <p>Expert guidance is publicly available. For example, the Government of Scotland Guidance: Decision making: children and young people's participation, directs readers to relevant information: <a href="https://www.gov.scot/publications/decision-making-children-and-young-peoples-participation/pages/guidance/">https://www.gov.scot/publications/decision-making-children-and-young-peoples-participation/pages/guidance/</a></p> <p>Credible proxies for children's views may include: local children's rights experts, women's organisations or community-based organizations.</p> <p>Relevant stakeholders may include: potentially affected groups and credible proxies, such as representatives of trade unions, civil society organisations, women's organisations, local children's rights experts, community-based organisations, international organizations, or governments.</p> <p>Where such engagement is not possible, the enterprise should consult credible proxies for children's views, such as local children's rights experts or community-based organizations</p> |  <p>Fundamental</p> <p>MS Index: Participation and Inclusion</p> <p>Will remain in CLI in this specific form.</p> |

## Provision 6: Remediation





| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder  | Indicator Type  |
|--|---|---|---|---|
| <b>Criterion 6.1: Remediation</b>  |   |   |   |   |
| The enterprise has a strategy and system in place to provide for or participate in remedy where it causes or contributes to a child labour impact                              |   |   |   |   |
|  <p><b>A6.1.1 Remediation readiness.</b></p> <p>ILO-IOE 2014, C.71<br/>UNICEF 2013, P§15.</p> |     <p>The enterprise has defined operating procedures to provide for or participate in remedy should a child labour incident arise in its operations. <b>(2)</b></p> <p><i>AND</i><br/>The procedures ensure that actions are taken to protect the rights of children. <b>(1)</b></p> <p><i>AND</i><br/>The procedures ensure that actions do not perversely incentivise child labour within the family or community. <b>(1)</b></p> <p><i>AND</i><br/>The remediation approach includes a commitment to work with independent child rights organisations or governments to ensure that the implementation of the procedure will protect the rights of the impacted child and stakeholders. <b>(1)</b></p> |  <p>The enterprise verifies that its tier 1 suppliers operating in medium- and high-risk contexts have defined operating procedures to provide for or participate in remedy should a child labour incident arise. <b>(2)</b></p> <p><i>AND</i><br/>The enterprise verifies that these operating procedures include a commitment to work with independent child rights organisations or governments to ensure that the implementation of the procedure will protect the rights of the impacted child and stakeholders. <b>(1)</b></p> | <p>The operating procedures should clearly define the enterprise's standard procedure for engaging with impacted stakeholders should cases of child labour in its operations, business relationships or supply chain be reported.</p> <p>It should set out that when designing a remediation approach enterprises should:</p> <ol style="list-style-type: none"> <li>1. assess the child's individual situation (family background, community situation, education infrastructure, work environment, seasonality of push/pull factors, etc.) to identify which activities are most appropriate for the specific case,</li> <li>2. check those activities to assure that they do not cause unexpected harm to the child, their family or the community (e.g. by indirectly perpetuating child labour through perverse incentives), and</li> <li>3. include expert organisations (local/international NGOs, government, etc.) in the design of those activities.</li> </ol> <p>It should include that actions to be taken to protect the rights of children may include but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Ensuring the child is in a safe place,</li> <li>2. Ensuring access to education. This can take different forms from organizing a school bus to paying school fees, organizing or providing apprenticeship programs for children of working age (generally 15-17), etc.,</li> <li>3. Supporting children to be integrated into education suitable to their situation,</li> <li>4. Providing a living stipend or other material support to replace lost income and to avoid children returning to work, and</li> <li>5. Provide ongoing support to children and families in a remediation program (e.g. counselling, monitoring) to ensure a long-term impact.</li> </ol> |  <p>Horizontal</p> |

**Incident expectations for enterprises that have identified at least one incident of child labour in their operations, supply chains, or business relationships**

## Provision 1: Policy commitment on the right of children to be free from child labour

| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder   | Indicator Type   |
|--|--|--|--|--|
| <b>Criterion 1.1: Embedding, accountability, resources and decision-making</b><br>In order to take effective action, the right internal decision-making structures need to be in place. The people in the enterprise whose decisions or actions can affect the management of child labour impacts also need to be engaged. |  |  |  |  |
|  <p><b>1.1.1 Sufficient resources</b> for implementing appropriate remedy.</p> <p>UNICEF 2013, CRBP 4, S§4b.</p>  |  <p>The enterprise assigns trained personnel to be responsible for implementing the child labour remediation plan for the business as a whole and for each individual case. <b>(1)</b></p> <p>AND</p> <p>This personnel reports to the person accountable for implementation of the child labour policy. <b>(1)</b></p> <p>AND</p> <p>Sufficient financial and other resources are made available to be able to implement remediation. <b>(1)</b></p> |  <p>The enterprise verifies that suppliers that have caused or contributed to a child labour impact have assigned trained personnel and sufficient financial and other resources to implement appropriate remedy. <b>(1)</b></p> <p>AND</p> <p>Helps them build the capacity to do so, where required. <b>(1)</b></p> | <p>Adequate financial resources may be judged by whether or not there is a surplus in available funds at the end of the budget period.</p> |  <p>Horizontal</p> <p>Responsibility for implementing remediation must always be assigned to trained individuals.</p> |

## Provision 2: Risk & impact assessment

| Performance expectation   | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder   | Indicator Type   |
|---|--|--|--|--|
| <b>Criterion 2.2: Root Causes</b><br>The enterprise identifies the root causes of its actual or potential child labour risks and impacts.   |  |  |  |  |
|  <p><b>2.1.1</b></p> <p>The enterprise undertakes joint fact-finding processes on child labour.</p> <p>OECD Minerals Guidance.</p> |  <p>The enterprise undertakes joint fact-finding processes on incidents of child labour with local NGOs, communities, government agencies, trade unions and/or workers to identify root causes, including hearing the perspectives of affected people (children, parents) or their legitimate representatives. <b>(1)</b></p> |  <p>The enterprise undertakes joint fact-finding processes on incidents of child labour in its supply chains with its suppliers, local NGOs, communities, government agencies, and/or independent third parties. <b>(1)</b></p> | <p>There is a risk of child rights violations when suppliers are directly involved in assessing or handling child labour cases. According to the Centre for Children's Rights and Business, there have been cases of children and families being blackmailed, threatened and even assaulted where remediation has been led by the implicated enterprise.</p> |  <p>Horizontal</p> <p>Investigation into the causes human rights violations should involve third parties to minimise the risk of abuse.</p> |








### Provision 3: Prioritisation, prevention and mitigation

No incident expectations. See Provision 3 of the Human Rights Index.

### Provision 4: Monitoring, tracking and reporting

No incident expectations. See Criterion 4.1.2 in Additional Expectations and Provision 4 of the Human Rights Index.





### Provision 5: Stakeholder engagement

| Performance expectation  | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder  | Indicator Type  |
|--|---|--|---|---|
| <b>Criterion 5.2: Engaging potentially affected stakeholders</b><br>The enterprise engages with people who may be impacted by their operations, business relationships or supply chains  |   |  |   |   |
|  <p><b>5.2.1</b><br/>Third party engagement with people who may be impacted by the enterprise's operations or business relationships.</p> <p>UN 2012<sup>16</sup>.<br/>UNICEF 2013, P§26.</p> |     <p>The enterprise assigns child labour remediation case handling to an independent third party. <b>(1)</b></p> <p><i>AND</i><br/>Through this third party the enterprise seeks to directly engage with affected children or their families, particularly regarding design and implementation of remedy, assessing its impacts and tracking the effectiveness of its responses. Where such engagement is not possible, the enterprise consults credible proxies for children's views. <b>(1)</b></p> |  <p>The enterprise requires its tier n suppliers to assign child labour remediation case handling to an independent third party. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise requires that through this third party its suppliers engage with affected children or their families, particularly regarding design and implementation of remedy, assessing the supplier's impacts and tracking the effectiveness of its responses. <b>(1)</b></p> <p><i>AND</i><br/>The enterprise checks that where such engagement is not possible, its suppliers consult credible proxies for children's views. <b>(1)</b></p> | <p>Engagement with affected children or their families is done through a third party in order to avoid conflict of interest and ensure remediation is always done in the interest of the impacted rights holders. Third party handlers should ideally be a child protection agency or specialist organisation.</p> <p>Credible proxies may include: representatives of trade unions, civil society organisations, women's organisations, local children's rights experts, community-based organisations, international organizations, or governments.</p> |  <p>Specific</p> |








<sup>16</sup> The Corporate Responsibility to respect human rights, an interpretive guide, 2012, UN ([https://www.ohchr.org/documents/publications/hr.pub.12.2\\_en.pdf](https://www.ohchr.org/documents/publications/hr.pub.12.2_en.pdf))











## Provision 6: Remediation

| Performance expectation   | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)   | Guidance Placeholder   | Indicator Type  |
|---|---|---|--|---|
| <b>Criterion 6.1: Remediation</b>   |   |   |  |   |
| The enterprise has a strategy in place to provide for or participate in remedy where it causes or contributes to a child labour impact  |   |   |  |   |
|  <p><b>6.1.1 Immediate actions (before designing a remediation programme).</b></p> <p>UNICEF 2013, CRBP 2, P§11.</p> |  <p>In each case where a child has been found to be subject to child labour in the enterprise's operations, the enterprise can demonstrate that it has taken the following actions: <b>(2)</b></p> <ul style="list-style-type: none"> <li>Removed the child from all work immediately</li> <li>Explained to the child (and parents or carers if there are any) about potential remediation measures</li> <li>Obtained the child's (and parents' or carers' if there are any) agreement to enrol the child in a remediation programme</li> <li>Provided free food and free and safe accommodation to the child until a remediation programme is operational, where applicable.</li> </ul> |  <p>In each case where a child has been found to be subject to child labour in the enterprise's supply chain, the enterprise verifies that its affected supplier has taken the following actions: <b>(2)</b></p> <ul style="list-style-type: none"> <li>Removed the child from all work immediately</li> <li>Explained to the child (and parents or carers if there are any) about potential remediation measures</li> <li>Obtained the child's (and parents' or carers' if there are any) agreement to enrol the child in a remediation programme</li> <li>Provided free food and free and safe accommodation to the child until a remediation programme is operational, where applicable.</li> </ul> | <p>Perverse incentives may be measures that may incentivize the child, their family or other community members from putting a child into a situation of child labour in order to benefit from a remediation programme.</p> |  <p>Horizontal</p> <p>All ESG issues will have some issue-specific actions necessary in immediate response to an incident arising, before the design of the remediation programme.</p> |

## Provision 6: Remediation

| Performance expectation  | Impact Domain 1 Indicators (operations)  | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder   | Indicator Type  |
|--|--|--|--|---|
| <b>Criterion 6.1: Remediation</b>  |  |  |  |   |
| The enterprise has a strategy in place to provide for or participate in remedy where it causes or contributes to a child labour impact   |  |  |  |   |
|  <p><b>6.1.2</b><br/><b>The design</b><br/>of a remediation programme for each child labour incident.</p> <p>UNICEF 2013, CRBP 2, P§11.</p> |     <p>The enterprise designs each remediation case in accordance with its remediation procedure and with due regard to the specific circumstances of each child labour case. <b>(1)</b></p> |  <p>The enterprise verifies that its supplier follows the supplier's remediation procedures in designing the specific remediation approach for each child labour case. <b>(1)</b></p> | <p>When designing a remediation approach enterprises should:</p> <p>a) assess the child's individual situation (family background, community situation, education infrastructure, work environment, seasonality of push/pull factors, etc.) to identify which activities are most appropriate for the specific case, b) check those activities to assure that they do not cause unexpected harm to the child, their family or the community (e.g. by indirectly perpetuating child labour through perverse incentives), and c) include expert organisations (local/international NGOs, government, etc.) in the design of those activities.</p> <p>The design of remediation for each child labour incident will differ depending on each case, but should include the following actions:</p> <ul style="list-style-type: none"> <li>• Identification of the remediation team</li> <li>• Engagement of an independent third party handler of each incident</li> <li>• Investigation into the specific circumstances of each child (including family background, education history and economic circumstances)</li> <li>• Identification of an appropriate school/training or tutoring facility</li> <li>• Identification of an appropriate accommodation facility, if needed</li> <li>• Agreement of who will fund the remediation costs</li> <li>• Agreement on who will be responsible for monitoring the ongoing programme</li> <li>• Agreement with the parents or guardian on the remediation programme.</li> </ul> |  <p>Fundamental</p> <p>MS Index:<br/>Remedy</p> <p>Guidance is specific to child labour.</p> |

## Provision 6: Remediation

| Performance expectation   | Impact Domain 1 Indicators (operations)   | Impact Domain 2 Indicators (in supply chains)  | Guidance Placeholder   | Indicator Type   |
|---|---|--|--|--|
| <b>Criterion 6.1: Remediation</b>   |   |  |  |  |
| The enterprise has a strategy in place to provide for or participate in remedy where it causes or contributes to a child labour impact  |   |  |  |  |
|  <p><b>6.1.3</b><br/>Supporting measures that may prevent the impacted child from being likely to participate in child labour in the future.</p> <p>UNICEF 2013, CRBP 2, P§11.</p> |  <p>For each child labour case in its operations, the enterprise provides support by following the measures most appropriate to the child's circumstances, with the goal of avoiding perverse incentives. <b>(2)</b></p> <p><i>AND</i><br/>This support is for a determined period. <b>(1)</b></p> |  <p>For each child labour case in its supply chains, the enterprise verifies that its supplier provides support by following the measures most appropriate to the child's circumstances, with the goal of avoiding perverse incentives. <b>(2)</b></p> <p><i>AND</i><br/>That this support is for a determined period. <b>(1)</b></p> | <p>See A6.1.1.</p> <p>All support measures should be done with the interest of the child as the priority.</p> <p>Perverse incentives may be measures that may incentivize the child, their family or other community members from putting a child into a situation of child labour in order to benefit from a remediation programme.</p> <p>Determined period should be at a minimum until the child reaches working age or has completed compulsory education, when it can be ensured children are able to find alternative sources of income that not force them back into child labour.</p> |  <p>Specific</p>  |
| <p><b>6.1.4</b><br/>Tracking impacts of remediation on affected children.</p>   |  <p>The enterprise assesses the positive and adverse impacts of its remediation programme on each affected child and their family. <b>(1)</b></p>  | <p>The enterprise checks that its suppliers assess the positive and adverse impacts of their remediation programme on each affected child and their family. <b>(1)</b></p>   |  |  <p>Specific</p>  |
| <p><b>6.1.5</b><br/>Supporting <b>small enterprises</b> to remediate child labour.</p>  |   |  <p>Where the supplier is a small enterprise and does not have the capacity to adequately remedy the harm, the enterprise provides additional support to bridge the gap if the enterprise contributed to the child labour impact. <b>(1)</b></p>  | <p>Small enterprise may include an artisanal / small scale mining enterprise.</p> <p>For example, the enterprise may work towards establishing or support and/or fund remediation mechanisms via third parties, such as civil society organisations.</p>   |  <p>Horizontal:</p> <p>Each KPI will need provisions that ensure small businesses can address their human rights impacts.</p> |

