EXPECTATIONS FOR THE PREVENTION AND REMEDIATION OF CHILD LABOUR AND PROTECTION OF YOUNG WORKERS FROM HAZARDOUS WORKING

Airbus is committed to , taking into account international standards and principles, including:

- International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- United Nations Guiding Principles on Business and Human Rights (UNGPs);
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- OECD (Organisation for Economic Cooperation and Development) Guidelines for Multinational Enterprises on Responsible Business Conduct;
- OECD Due Diligence Guidance for Responsible Business Conduct; and
- Ten Principles of the UN Global Compact, of which Airbus has been a signatory since 2003.

As part of its commitments, Airbus aims to ensure that child labour does not exist in its business, operations and supply chain, and to protect young workers from hazardous working.

This commitment aligns with the International Labour Organization (ILO) Minimum Age Convention, 1973 (No. 138), the Worst Forms of Child Labour Convention, 1999 (No. 182), the Night Work of Young Persons (Industry) Convention, 1919 (No. 6), and the United Nations Convention on the Rights of the Child (UNCRC), emphasising that:

- All actions concerning the child shall take full account of his or her best interests (Article 3); and
- The right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development (Article 32.1); as well as
- Protection from Violence, Abuse and Neglect (Article 9), and the Right to Education (Article. 28),

For definitions of terms, see the end of this document.

Scope of this document

The 'expectations for the prevention and remediation of child labour and protection of young workers from hazardous working' (herein after referred to as "this document") outlines Airbus' expectations on suppliers and other third parties to prevent and address child labour as well protecting young workers from hazardous working. This document reflects Airbus' values and commitments, as defined in the Airbus Company Human Rights Policy, the Airbus Human Rights Policy Statement and the Airbus Supplier Code of Conduct.

Airbus Human Rights Policy Statement: "In accordance with ILO Convention C182 (child labour) Airbus condemns all forms of child labour. As a minimum, Airbus respects the minimum working age as defined by ILO Convention C138 or the provisions of national law or valid collective agreements, if they are more favourable to the child. Airbus is committed to protecting all workers under the age of 18 from performing work that is likely to be hazardous or harmful to their education, health, physical, mental, social, spiritual, or moral development."

The **Airbus Human Rights Policy Statement** can be found on Airbus.com **here**

Airbus Supplier Code of Conduct: "Suppliers must ensure that child labour is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labour Organization (ILO), whichever is higher. All workers under the age of 18 must be protected from performing work that is likely to be hazardous or that may be harmful to their health, physical, mental, social, spiritual, or moral development."

The **Airbus Supplier Code of Conduct** can be found on Airbus.com **here**

Suppliers and other third parties are expected to uphold the expectations outlined in this document, either by adopting the requirements directly or by ensuring that their own practices align with the requirements. Suppliers and third parties are also responsible for extending these principles to their other business relationships.

Not all work carried by children is considered to be child labour. Work that is legally permissive, does not affect a child's health and personal development or interfere with schooling, and that is age-appropriate, safe, light and not hazardous, is classed as **child work**. This includes activities such as helping at home, family farming /business assistance, or earning pocket money outside school hours.

Child labour on the other hand is work that deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development. This prohibited work is characterised by being mentally, physically, or morally dangerous, or by interfering with their schooling, either by preventing attendance or by requiring excessively long and heavy work.

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Responding to child labour

Airbus expects all business activities across its value chain to recognise international standards on the protection of child rights and to comply with all relevant national and international laws, regulations and provisions on child labour, applicable in the country of operation. It is also expected that the appropriate measures are implemented to ensure that no child labour occurs at their places of operations.

Airbus is committed to the prevention of child labour and will only work with suppliers and other third parties who are also committed to the prevention of child labour. Examples of **specific measures** that can be taken to proactively manage child labour risks include:

- Put in place a policy which stipulates the minimum age of all workers, aligned with applicable laws /international standards, as well as the procedures to follow in the event a child labour case is identified;
- Ensure business partners are aware of the company policy and expected procedures to follow for identified child labour cases;
- Provide training and awareness programmes to employees and stakeholders on child labour risks, legal requirements and signs to watch for;
- Ensure grievance mechanisms are in place, accessible and transparent, with an anonymous reporting channel for employees and third-party stakeholders to report suspected cases of child labour without fear of retaliation;
- Conduct regular risk assessments to identify risks of child labour in different regions or sectors, especially in lower supply chain tiers, areas with a higher prevalence of child labour, or in roles where child labour is common;
- Include child labour indicator checks in audits;
- Implement an age verification process (e.g., verifying the applicant's proof-of-age documents in their original form /conducting in person interviews) and maintain a robust database to document age verification and employee details (name, job ID number, date of birth and date of joining);
- Develop a child labour remediation programme with the support of relevant expertise for long-term support if child labour is identified, including steps to withdraw children from labour, provide education and support, and ensure their wellbeing; and
- Identify child labour specialist third-party organisations such as NGOs, civil society organisation or government bodies that can provide support in remediating any cases of child labour.

Expectations if child labour is found

- Inform Airbus of all identified cases of child labour;
- If the child is in immediate risk of harm (i.e., hazardous child labour or worst forms of child labour) then the child must be safely removed from the situation ASAP;
- Engage a specialist third-party organisation to support in managing identified cases of child labour;
- Ensure a corrective action plan (CAP) is implemented (using specialist support as indicated), including remediation measures as appropriate, that takes the child's best interest into consideration and responds to their needs (details on developing a CAP can be found in the following section), and share it with Airbus; and
- Monitor the effectiveness of the corrective action plan.

In addition:

- Do not immediately dismiss or remove any suspected or confirmed child labourers;
- Do not threaten the children or their families or take any actions that would interfere with or delay the remediation process;
- Do not conceal evidence of child labour. If child labour is found, it is essential to focus on investigating and addressing the issue rather than concealing it; and
- Do not limit access to or falsify any documentation.

Developing a corrective action plan

A CAP is a structured and individually tailored response plan that a company implements. The goal is to ensure the immediate safety and wellbeing of the child, address the root causes of the issue, and prevent recurrence. When developing a CAP the protection of the child should be a priority at all times.

The Ethical Trading Initiative outlines a set of principles that should be followed when developing a CAP:

- Prioritise the child's welfare and interests: Every action should place the highest priority on protecting the child and ensuring their best interests.
- Ensure actions improve the child's situation: Any intervention should aim to enhance the child's situation without increasing their vulnerability to further abuse or harm.
- Consider the child's welfare in decisions regarding employment: A child should not be dismissed or redirected without carefully assessing the potential consequences on both the child and their family's welfare.

It is strongly recommended that qualified specialist support is sought as soon as possible to support in the remediation of a case of child labour and the implementation of a CAP. This could include an organisation such as an NGO, member of civil society or local government body to ensure the safety of the child and support a more targeted, effective remediation plan.

The CAP should ensure:

- The situation is assessed as soon as possible and the child appropriately protected;
- Where required, specialist resources are engaged (such as counselling, medical care, education access), especially in high-risk situations (such as cases of abuse);
- Parents of the child are engaged as appropriate ideally by a specialist organisation to understand the factors contributing to the situation (e.g., financial hardship, lack of schooling access);
- An appropriate remediation plan is implemented, which focuses on the best interest of the child including in terms of access to education etc, considering any specific circumstances; and
- A follow up plan is established to ensure ongoing support by following up with the child and family during the CAP's implementation and to monitor effectiveness.

All actions should be documented. Airbus reserves the right to request a progress update and associated documentation during or following the process.

Protecting young workers

Airbus is committed to the fair and legal employment of young workers. Young workers should be safeguarded from roles or work environments that could potentially harm their health, safety, or moral development. This is essential as young workers are still physically and mentally developing making them more vulnerable to health impacts as well as accidents and injuries. To maintain this standard, Airbus expects the following requirements for young workers to be strictly adhered to. This includes ensuring young workers are not conducting hazardous work.

The following are examples of hazardous work according to the ILO *(check also applicable laws)*:

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

The Ethical Trading Initiative outlines a set of principles to follow in this process:

- Protect young workers through adequate safeguard: Young workers must not be employed unless suitable precautions are in place to ensure their safety and protection.
- Prohibit the use of labour agents for young workers or children: Children and young workers should not be employed through labour agents, as they are at greater risk of exploitation than adults.

Examples of specific measures which can be taken to proactively protect young workers include:

- Create policies outlining age restrictions, acceptable roles, and work conditions for young workers and communicate these policies to all employees and suppliers;
- Implement an age verification process (e.g., verifying the applicant's proof-of-age documents in their original form) and maintain a robust database to document age verification and employee details (e.g., name, job identify number, date of birth and date of joining);
- Conduct safety assessments to identify and record any hazardous work or conditions where young workers should not be working, as well as non-hazardous work that is safe for young workers and complies with applicable laws;
- Limit working hours for young workers ensuring they have sufficient time for rest, education and personal development
- Assign mentors or supervisors to young workers who can ensure they are not exposed to unsafe conditions;
- Ensure grievance mechanisms are in place, accessible and transparent, with an anonymous reporting channel for employees and stakeholders to report suspected cases of young workers in hazardous conditions without fear of retaliation; and
- Where required by local laws, register young workers with appropriate authorities (e.g., labour authorities).

Expectations if young workers are found doing hazardous work:

- Immediately remove the young worker from the hazard;
- Reassign the young worker to non-hazardous tasks without any reduction in pay or benefits;
- Carry out an assessment to establish work that the young worker can do safely under international requirements;
- Establish sufficient management systems and training to ensure that the young worker follows safe systems of work and does not participate in any form of hazardous work.

Key definitions

"Child" refers to any person under 18 years of age (ILO No. 182). For the purposes of employment, the minimum working age is set at not less than 15 years, or higher if local laws dictate so (ILO No. 138).

"Child labour" is defined by the ILO as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

"Child work" (or permissible light work) refers to the participation of children in light, safe, and age-appropriate activities that do not harm their health or development or interfere with schooling (e.g., helping at home, family farming/business assistance, or earning pocket money outside school hours), in line with the light work provisions of ILO No. 138.

"Worst forms of child labour" refers to slavery and similar practices, sexual exploitation, involvement in illicit activities, and work that endangers the health, safety, or morals of children (ILO No. 182).

"Young worker" refers to anyone who is above the legal minimum working age (typically 15 or older) but under the age of 18.

"Hazardous work" is work that, by its nature or circumstances, is likely to harm a child's health, safety, or moral development. This includes working with heavy machinery, chemicals, extreme temperatures, at heights, and working overtime or nights.

A link to the **ILO Helpdesk on Business and Child Labour** can be found **here**

For further information, see the **human rights page** on Airbus.com **here**