



COMPANY POLICY AGAINST MODERN SLAVERY, CHILD LABOR, AND YOUTH PROTECTION AT FOLBB

Version	Date	Responsible
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1. Purpose

This policy establishes the principles and measures that FOLBB applies to prevent child labor, protect young workers, and combat modern slavery. The goal is to ensure that all practices are in accordance with international human rights standards and national laws.

2. Scope

This policy applies to all employees, departments, and locations of FOLBB, as well as to all business partners and suppliers of FOLBB.

3. Definition

- **Child Labor:** Any form of work carried out by children below the legal minimum age that endangers their development, health, or education. This definition is based on ILO Conventions No. 138 and 182, Article 32 of the UN Convention on the Rights of the Child (UNCRC), and national laws.
- **Modern Slavery:** Includes forced labor, debt bondage, human trafficking, and other forms of involuntary labor.
- **Forced Labor:** Work that is performed under the threat of punishment or without the voluntary consent of the person involved.
- **Debt Bondage:** Work performed to pay off a debt, where the person has no reasonable opportunity to pay off the debt.
- **Human Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of persons through threats, violence, abduction, fraud, deception, or abuse of power for the purpose of exploitation

4. Principles

4.1 Prohibition of Child Labor

FOLBB does not tolerate any form of child labor throughout its supply chain.

4.2 Youth Protection

FOLBB ensures the protection of young workers from hazardous work and ensures that their work complies with legal requirements.

4.3 Prohibition of Modern Slavery

FOLBB does not tolerate any forms of modern slavery, including forced labor, debt bondage, and human trafficking, throughout its supply chain.

4.4 Human Rights

FOLBB recognizes and will protect and respect the human rights of all employees and contract workers.

4.5 Compliance with Laws and Standards

FOLBB adheres to all relevant local, national, and international laws and standards, including the conventions of the International Labour Organization (ILO).

5. FOLBB Measures

5.1 Age Verification and Working Conditions for Young Workers

- Implementing robust procedures for age verification when hiring new employees.
- Ensuring that young workers (16-18 years) only perform light work that does not endanger their health and development.
- Compliance with legal regulations regarding working hours and conditions for young workers.

5.2 Risk Assessment and Due Diligence

- Conducting risk assessments to identify areas within the supply chain that are vulnerable to child labor and/or modern slavery.
- Implementing due diligence procedures to verify and monitor compliance with this policy.

5.3 Supplier Management

- Integrating clauses to prevent modern slavery in all supplier contracts.
- Conducting regular audits and inspections of suppliers to ensure compliance with this policy.

5.4 Training and Awareness

- Conducting regular training for employees and suppliers to raise awareness of the risks and signs of modern slavery.
- Providing informational materials and resources to support compliance with this policy.

5.5 Working Conditions and Rights

- Ensuring that all employees and contract workers work under fair conditions that respect their rights and dignity.
- No tolerance for forced labor, debt bondage, or other forms of modern slavery.

6. Responsibilities

6.1 Management

Management is responsible for implementing and monitoring this policy and providing the necessary resources.

6.2 Employees

All FOLBB employees are required to follow the measures set out in this policy and report any suspected cases of modern slavery or human trafficking immediately.

6.3 Procurement and Supply Chain Management

The Procurement and Supply Chain Management departments are responsible for ensuring that all suppliers comply with this policy and have implemented appropriate measures to prevent modern slavery.

6.4 Compliance Officer

The Compliance Officer monitors adherence to the policy, conducts regular audits, and reports to management.

7. Monitoring and Reporting

7.1 Audits

Confirmation from the supplier that they comply with the policy at their own sites as well as at their subcontractors' sites.

7.2 Reporting System

Establishing a transparent and anonymous reporting system for employees and external stakeholders to report violations of this policy.

7.3 Reporting

Preparing and publishing annual reports on the measures and progress in preventing modern slavery.

7. Consequences of Violations

Violations of this policy will not be tolerated and may result in disciplinary actions for FOLBB employees. If a supplier violates this policy, it may lead to the termination of business relationship

8. Review and Update

This policy will be regularly reviewed and updated as necessary to ensure that it complies with the latest legal requirements and industry best practices.

9. Final Provision

This policy takes effect immediately and is binding on all employees and suppliers.

Baiersbronn, 30. August 2024

Signiert von:

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Dietmar Kiechle / CFO & Compliance Beauftragter