

FSC® core labour requirements self-assessment

To be completed before your FSC audit and returned to your auditor.

Company name: Jones and Palmer Ltd and approved FSC outsource contractors

COC certificate code (if already certified): INT-COC-002386

Country: Great Britain

NOTE: If you have more than one site, or if you use outsourcers, the self-assessment must cover all of them. Please use multiple copies of this form if required. Use of this template is not obligatory and you may use the editable PDF version available on the FSC website, or develop your own, provided that all the points below are covered.

Confirmation of a Company policy statement which covers the core labour requirements below: *Yes / No*

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

Stephen O'Brien

2nd May 2023

Name

Date

Child Labour

Requirement	Questions	Answer
<p>7.2 The organisation shall not use child labour.</p> <p>7.2.1 The organisation shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.</p> <p>7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours.</p> <p>7.2.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.</p> <p>7.2.4 The organisation shall prohibit the worst forms of child labour.</p>	<p>a) Does your organisation comply with Clause 7.2? If yes, continue at c).</p>	<p>Yes – Jones and Palmer will comply with UK employment law https://www.gov.uk/child-employment</p>
	<p>b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.2.</p>	
	<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies with Clause 7.2.</p>	<p>At the point of employment employees must give proof of their age – driving licence, passport, birth certificate. These are kept as confidential records.</p>
	<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.2.</p>	<p>Driving licence, passport, birth certificate</p>
	<p>e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.2. Please describe them, and how they impact your ability to comply with Clause 7.2.</p>	<p>None known</p>
	<p>f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.2.</p>	<p>Jones and Palmer will:</p> <ul style="list-style-type: none"> • <i>Not engage in or support the use of child labour</i>

Forced Labour

Requirement	Questions	Answer
<p>7.3 The organisation shall eliminate all forms of forced and compulsory labour.</p> <p>7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.</p> <p>7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:</p> <ul style="list-style-type: none"> ● physical and sexual violence ● bonded labour ● withholding of wages /including payment of employment fees and or payment of deposit to commence employment ● restriction of mobility/movement ● retention of passport and identity documents ● threats of denunciation to the authorities. 	<p>a) Does your organisation comply with Clause 7.3? If yes, continue at c).</p>	<p>Yes – Jones and Palmer will comply with UK employment law Modern Slavery Act 2015 https://www.legislation.gov.uk/ukpga/2015/30/contents</p>
	<p>b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.3?</p>	
	<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies Clause 7.3?</p>	<p>Employees are free to come and go as they please within their working contract. Working hours are determined in the employment contract, as well as holidays, sickness and compassionate leave</p>
	<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.3.</p>	<p><u>Employee handbook and contracts include:</u> Working hours and Holiday allowance Compassionate leave Medical treatment/sick pay Pensions Grievance policy Disciplinary policy Leave arrangements Leaving the company Pay, Benefits & Pensions</p>
	<p>e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.3. Please describe them, and how they impact your ability to comply with Clause 7.3.</p>	<p>None known</p>
	<p>f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.3.</p>	<p><u>Labour Practice Policy:</u> <i>Jones and Palmer will:</i></p> <ul style="list-style-type: none"> ● <i>Not engage in or support the use of any form of forced or compulsory labour.</i>

Discrimination in Employment and Occupation

Requirement	Questions	Answer
<p>7.4 The organisation shall ensure that there is no discrimination in employment and occupation.</p> <p>7.4.1 Employment and occupation practices are non-discriminatory.</p>	<p>a) Does your organisation comply with Clause 7.4? If yes, continue at c).</p>	<p>Yes – Jones and palmer will comply with UK employment law https://www.gov.uk/employer-preventing-discrimination</p>
	<p>b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.4.</p>	
	<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies with Clause 7.4.</p>	<p>Applicants for vacancies are not subject to unfair discrimination.</p>
	<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.4.</p>	<p><u>Contained in staff handbook and employment contract:</u> Job descriptions, advertisements for jobs Anti-discrimination policy Bullying and harassment policy Grievance procedure</p>
	<p>e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.4. Please describe them, and how they impact your ability to comply with Clause 7.4.</p>	<p>None known</p>
	<p>f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.4.</p>	<p>Jones and Palmer Labour Practice Policy:</p> <ul style="list-style-type: none"> • <i>Not engage in or support any form of unfair discrimination in any aspect of its employment practices.</i>

Freedom of Association and the Right to Collective Bargaining

Requirement	Questions	Answer
7.5 The organisation shall respect freedom of association and the effective right to collective bargaining.	a) Does your organisation comply with Clause 7.5? If yes, continue at c).	Yes – Jones and palmer will comply with UK employment law https://www.gov.uk/browse/employing-people/trade-unions
7.5.1 Workers are able to establish or join worker organisations of their own choosing.	b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.5.	
7.5.2 The organisation respects the full freedom of workers' organisations to draw up their constitutions and rules.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies with Clause 7.5.	Employee handbooks and contracts do not restrict the right to employee freedom of association and effective right to collective bargaining.
7.5.3 The organisation respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organisation, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.5.	Employee files and 121 notes.
7.5.4 The organisation negotiates with lawfully established workers' organisations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.5. Please describe them, and how they impact your ability to comply with Clause 7.5.	None known.
7.5.5 Collective bargaining agreements are implemented where they exist.	f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.5.	Jones and Palmer Labour Practice Policy: <ul style="list-style-type: none"> • <i>Supports its employees' rights to Freedom of Association and to collective bargaining; all personnel shall have the right to form, join and organise trade unions of their choice that will bargain collectively on their behalf with the organisation</i>

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

In FSC-STD-40-004 v3-1, FSC has provided the following open questions that may be helpful to take into consideration when completing the self-assessment. The level of detail required will depend on the location of the site(s), including the assessment of risk, and the labour environment. This list of questions is not exhaustive.

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