

Maersk Guideline for dealing with (potential) cases of child labour and labour of young persons

Child labour and young persons

No child should be engaged in work that deprives them of their childhood, their potential, and their dignity. This includes work that is mentally, physically, socially, or morally dangerous and harmful to children; work that interferes with their schooling.

No child should be subjected to the worst forms of child labour including, but not limited to, trafficking, sexual exploitation, debt bondage, forced labour and the recruitment or use of underage children for security or military purposes.

No child under the legal age limit for work (but no less than 15 (16 at sea)– whichever offers greater protection to the child) should be employed to carry out commercial tasks (either paid or unpaid).

Children aged 15-17 ('young workers') can be in employment if that is acceptable under local law and must be under strict provisions that support their wellbeing and development and protect them at work for all hazardous conditions. Provisions will be made for these young workers to ensure their working conditions and environment are age-appropriate and aligned with international standards, our own internal standards (the Maersk COMMIT Rule on Global Employee Relations, Maersk Supplier Code of Conduct, and the Maersk Global Standards for Third-Party Labour), and with applicable local legislation regarding safe working conditions.

We will ensure that any child that is found working (below the legal minimum, or 15 whichever is most beneficial for the child) will be offered remediation to ensure that their rights are respected, always considering the best interests of the child.

Application: this Guideline is applicable to all of our own operations worldwide and to all our suppliers. This Guideline covers permanent, temporary, informal or contract labour, whether directly or indirectly (via subcontractor) employed by the management of the workplace.

Immediate actions and remediation

If it is established, through credible due diligence and/or monitoring, that a (potential) case of child labour is found at an own operations site, we commit to immediately develop a solution that prevents further harm and supports the long-term interests of the child involved.

We expect suppliers to undertake credible due diligence and monitor their operations to ensure that their sites and supply chains are free from child labour and/or young people employed in hazardous work. Our suppliers are expected to fully support all stages of an investigation and remediation process and cover any costs from actions detailed in this policy or deemed necessary by Maersk or external support provider.

We will act if:

- Any substantiated knowledge or any credible evidence or suspicion that a child is being employed anywhere in our business or supply chain – i.e. we will commission an internal investigation or a third party investigation, depending on the circumstances
- Any child below the age specified here in this Guideline is actually found working.

- A young worker is found to be employed and not protected from hazardous working conditions.

What we will do with immediate effect if an underage child is found working:

- Put the welfare of the child and its interests as a first priority.
- Ensure that the child stops work immediately and is provided a clear explanation of immediate next steps. The child should be afforded all of the protections from applicable local labour law, and/or our own standards, whichever is better for the child.
- Explain what options are available and explain that they can have a say on what happens next.
- Contact the child's parents or guardians (where possible), explain the background of the situation and all possible options to them.
- Ensure immediately that the child has access to safe and adequate housing, is provided with meals, and is adequately protected from harm until the child can be reunited with its family or until the remediation plan is implemented – free of charge to the child (and its guardians).
- Develop a **remediation plan** with the child and relevant stakeholders (including parents/guardians. In case that is considered helpful or necessary, also including a relevant NGO or specialist local organisation and always in consultation with the child)
- Ensure that the child or parent/guardian receive(s) a financial compensation for the wages that are no longer paid in the short-term.
- Take steps to understand what other immediate basic needs the child has and provide for these needs in the short-term. If needed, ask for the assistance or advice from a relevant NGO or specialist local organisation.
- Explain the restrictions on working ages to the child and assure the child that, if it wishes, it can continue working after it reach the legal minimum working age. In case by that time the work is no longer available, the company will make a reasonable effort to provide other appropriate work.

What we will do if a young worker is found working in hazardous conditions:

- Immediately remove the young worker from hazardous tasks.
- Check if the young worker is safe and his/her health has not been negatively impacted. Conduct medical checks where appropriate. If required, support appropriate medical assistance to bring the young worker back to full health.
- Allow the young worker back to work when correct and adequate controls are in place and when there is no longer any risk of hazardous work.
- Ensure payment by Maersk or supplier of adequate financial compensation for the time the young worker was unable to work.

At the site in either case we will:

- Undertake a full review of all site personnel records and create a list of all potential child labourers and young workers and to unpick the gaps in current management systems, prioritising, and upskilling site management with clear KPIs monitored. Understand the root cause.
- Work with any appropriate local stakeholders.
- When the case involves a supplier, it is essential that this supplier reports any actual or suspected cases to Maersk immediately. This can be done by reporting the case or suspected

case in the Maersk Whistle-blower system, or by contacting Maersk Sustainable Procurement (see contact information below).

Development of a remediation plan:

- Provide the opportunity for children to enter education.
- Ensure the child receives adequate financial compensation on a monthly basis until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example, the employment of an unemployed adult family member in place of the child).
- Wages should be fair in the specific circumstances, and in line with at least the applicable national statutory minimum wage and paid irrespective of whether the child is supporting family members, or if the child is self-dependent.
- Ensure the child has access to appropriate training, apprenticeships or counselling that may be required to support their ongoing wellbeing and development.
- If the child is unable to return to his/her home, provide for short term acceptable and safe accommodation and living conditions for the child, in line with the Maersk HSSE guidelines for accommodations for workers, until the child can return to his/her home.
- All actions taken in support of remediation will be properly documented and stored.

Definitions:

Child Labour: Any work by a child younger than the age 15 (16 at sea) specified in the above policy, and any work that interferes with the child's education or is considered to be harmful to the child's or young person's health or physical, mental, spiritual, moral, or social development.

Young Person: Any worker over the age of a child labourer as defined above and under the age of 18.

Hazardous Conditions: The following are examples of hazardous work according to the ILO (International Labour Organisation) and any other relevant local restrictions for young workers:

- Work which exposes children 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 children 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 child is unreasonably confined to the premises of the employer.

*These Guidelines are an annex to the **Maersk Commit Rule on Global Employee Relations** and the **Maersk Global Standards for Third Party Labour**. The guidelines supplement the **Maersk Code of Conduct** and **Maersk Supplier Code of Conduct** (please refer to [Sustainability – Reports and Resources | Maersk](#)).*

Contact info:

1. **Reporting cases:** Maersk Whistle-blower Hotline - <https://secure.ethicspoint.eu/domain/media/en/gui/102833/index.html>, or Maersk Sustainable Procurement – sustainableprocurement@maersk.com
2. **Support & advice:** Maersk Global Employee Relations - employee.relations@maersk.com and Maersk Corporate Sustainability - sustainability@maersk.com

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