

Child Labour Policy Statement

Purpose

The purpose of this policy is to establish controls to ensure compliance and protection of children's rights with all applicable anti-child labour regulations, forced labour and human trafficking and to ensure OMG Education (OMG) and its supply chain conduct business in a socially responsible and ethical manner.

Definitions

What is Child Labour?

For the purposes of this policy: -

"Child" – means, a person less than 18 years of age;

"Child Labour" – means, Worst Form of Child Labour as defined by ILO Convention 1999 (No. 182) and Minimum Age of Admission to Employment as defined by ILO Convention 1973 (No. 138).

"Worst Forms of Child Labour" means:

- a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs;
- d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Definitions from a) to c) above are referred to as unconditional worst forms of child labour, and definition d) above refers to hazardous labour. All countries that ratify the ILO Convention (No. 182) are required to generate a Hazardous Labour List that specifically identifies hazardous child labour.

"Minimum Age of Admission to Employment" means:

- a) not less than the age of completion of compulsory schooling and will not less than 18 years.
- b) light work is permissible for children and could include work that is not likely to be harmful to their health or development and not such as to prejudice their attendance at school, their participation in vocational orientation or training programmes.

In short, child labour means any work involving a child that is mentally, physically, socially or morally dangerous and harmful to children, prevents him or her from attending school or concentrating at school, or negatively impacts on the health, social, cultural, psychological, moral, religious and related dimensions of the child's upbringing.

What is Forced Labour?

The ILO defines forced labour as work or service exacted from a person under threat or penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered him or herself voluntarily. It includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, and internal or international trafficking.

Forced or compulsory labour is now almost universally banned, and two ILO Conventions – the Forced Labour Convention, 1930 (No. 29) and Abolition of Forced Labour Convention, 1957 (No. 105) – are the most widely ratified of all international labour Conventions. Specific prohibitions of forced labour have also been incorporated in the labour codes or general employment legislation of many countries.

What is Human Trafficking?

Global efforts to control human trafficking has led to a number of new international anti-trafficking instruments, the most noteworthy of which is the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, (the “Palermo Protocol”), which supplemented the United Nations Convention against Transnational Organized Crime (2000), and the Council of Europe Convention on Action Against Trafficking in Human Beings (2005). The Palermo Protocol contains the following definition of trafficking, which is now almost universally accepted:

“Trafficking in persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.” We say “no” to exploitative labour practices and to any associated criminal conduct.

Policy Statement: OMG Education (OMG) Principles on Child and Forced Labour

Child and forced labour are pervasive problems throughout the world. Unfortunately, there are no effective international agreements that define the practice or create enforcement mechanisms against them. As an employer and purchaser of services and goods, OMG has an important role to play in these issues.

- OMG ensures that no person below the age of 18 years is employed in the workplace;
- OMG prohibits the use of forced or compulsory labour in all operations;
- OMG ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work;
- OMG refrains from engaging with vendors and suppliers who resort to using child labour and forced labour in their operations.

To this end, OMG has adopted the following Principles to reinforce its core value of treating all people with dignity and respect:

- OMG will not tolerate the use of child or forced labour in any of its operations and premises.
- We will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, and the physical punishment, abuse, or involuntary servitude of any worker.
- We expect our suppliers and contractors with whom we do business to uphold the same standards.
- Should a pattern of violation of these Principles become known to OMG and not be corrected, we shall discontinue the business relationship.
- It is the responsibility of management to implement and ensure compliance with these Principles at OMG premises.
- This policy is communicated to all employees in an appropriate and meaningful manner.
- Compliance with the Policy will be regularly monitored and evaluated.

Your Responsibilities

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of child labour, forced labour and human trafficking are the responsibility of all those working for us or under our control. You must notify your manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future. We reserve our right to terminate our contractual relationship with any suppliers if found to be in breach of this policy.