TS.LB.006

MANAGEMENT REQUIREMENTS FOR HUMAN RIGHTS

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REVISION HISTORY

Version	Date	Brief Description of Change
1.0.	18-01-2023	Launch of first version of TS.HH.006.
2.0	09-05-2023	Inclusion of Modern Slavery additional specific requirements
3.0	01-03-2025	Formatting for Landbell Group under TS.LB.006.

PURPOSE

The objective of the current Technical Specification (TS) is to establish the Human Rights minimum requirements to be fulfilled by any waste management operator (supplier) conducting activities of waste transport, handling, storage and/or treatment, who is currently offering or expected to offer such services directly to Landbell Group and its customers.

The requirements described here are to be read and interpreted on top of the requirements on TS.LB.001 (Technical and Management Requirements for WEEE), TS.LB.003 (Technical and Management Requirements for WBA) and TS.LB.010 (Technical and Management Requirements for Textile and Textile Waste). For ease of understanding and reference, some of the requirements from TS.LB.001, TS.LB.003 and TS.LB.010 are duplicated here. The duplicated requirements are shown in *italic* and colored in grey.

SCOPE

The guidelines described in this TS are applicable to all first-tier (1T) waste management suppliers belonging to the Landbell Group end-of-life supply chain, regardless if the services are performed at the suppliers´, customers´ site or any subcontractors´ site.

Geographical Scope

The current TS is applicable in any market where Landebll Group manages, or intends to manage directly, waste treatment operations or delivers take-back solutions to its customers, extended, in some cases, to other countries where downstream treatment vendors are located.

APPLICATION

Landbell Group programs of waste management and take-back are global. Landbell Group recognizes that the operational matrix where it operates, through our suppliers and partners, is very diverse in terms of legal and cultural maturity. While Landbell Group recognizes such differences and risk levels regarding Human Rights issues, the TS is applicable in all the markets where it operates as well as where our supplies and their downstream vendors operate.

Landbell Group waste management and take-back suppliers are required to understand and meet the requirements within this TS, and as a minimum require their immediate next tier to acknowledge and implement the TS.

However, it is only used as a standard to be audited against specific contexts (both markets and supply chain) where and when Landbell Group recognizes a poteantial Human Rights High Risks, following the guidance of the HB.LB.016 (EoL Supply Chain Audit Manual) and/or when the customers specifically demand. This assessment is done by TAM and CFO.

RULES OF DISSEMINATION

Landbell Group encourages the dissemination of the present TS to any waste management supplier, especially the ones that are a part of Landbell Group EoL supply chain. Such distribution should not alter, in any way, the meaning and content of the TS, therefore it is not authorized to share extracts of the TS, remove content or rephrase the standard requirements. The disclosure of the TS should always be integral to avoid misinterpretation of the requirements herein.

REFERENCES

References to conventions standards and other guidelines mentioned in the current TS are to be interpreted as referring to the latest version. References to legal acts mentioned in this TS are to be interpreted in its consolidated version, including all the corrections and amendments done subsequently after its first publication.

Reference	Description
GRI 401 (2016)	Employment
GRI 402 (2016)	Labour / Management Relations
GRI 403 (2018)	Occupational Health and Safety
GRI 404 (2016)	Training and Education
GRI 405 (2016)	Diversity and Equal Opportunity
GRI 406 (2016)	Non-Discrimination
GRI 407(2016)	Freedom of Association and Collective Bargaining
GRI 408 (2016)	Child Labour
GRI 409 (2016)	Forced or Compulsory Labour
GRI 413 (2016)	Local Communities
GRI 414 (2016)	Supplier Social Assessment
ILO (1998)	Declaration of the Fundamental Principles and Rights at Work
ILO 001 (1919)	Hours of Work (Industry) Convention
ILO 003 (1919)	Maternity Protection Convention
ILO 014 (1921)	Weekly Rest (Industry) Convention
ILO 019 (1925)	Equality of Treatment (Accident Compensation) Convention
ILO 029 (1930)	Forced Labour Convention
ILO 047 (1935)	Forty-Hour Week Convention
ILO 077 (1948)	Medical Examination of Young Persons Convention
ILO 087 (1948)	Freedom of Association and Protection of the Right to Organize Convention
ILO 089 (1948)	Night Work Convention
ILO 095 (1949)	Protection of Wages Convention
ILO 097 (1949)	Migration for employment Convention
ILO 098 (1949)	Right to Organise and Collective Bargaining Convention
ILO 100 (1951)	Equal Remuneration Convention
ILO 102 (1952)	Social Security (Minimum Standards) Convention
ILO 105 (1957)	Abolition of Forced Labour Convention
ILO 111 (1958)	Discrimination (Employment and Occupation) Convention
ILO 117 (1962)	Social Policy (Basic Aims and Standards) Convention
ILO 118 (1962)	Equality of Treatment (Social Security) Convention
ILO 121 (1964)	Employment Injury Benefits Convention

ILO 128 (1967)	Invalidity, Old-Age and Survivors Benefits Convention
ILO 130 (1969)	Medical Care and Sickness Benefits Convention
ILO 131(1970)	Minimum Age Fixing Convention
ILO 132 (1970)	Holidays with Pay Convention
ILO 135 (1971)	Workers Representatives Convention
ILO 138 (1973)	Minimum Age Convention
ILO 148 (1977)	Working Environment (Air Pollution, Noise and Vibration) Convention
ILO 154 (1981)	Collective Bargaining Convention
ILO 155 (1981)	Occupational Safety and Health Convention
ILO 156 (1981)	Workers with Family Responsibilities
ILO 157 (1982)	Maintenance of Social Security Rights
ILO 158 (1982)	Termination of Employment Convention
ILO 161 (1985)	Occupational Health Services Convention
ILO 162 (1986)	Asbestos Convention
ILO 170 (1990)	Chemicals Convention
ILO 171 (1990)	Night Convention
ILO 173 (1992)	Protections of Worker´s Claims (Employer´s Insolvency) Convention
ILO 174 (1993)	Prevention of Major Industrial Accidents Convention
ILO 175 (1994)	Part-Time Work Convention
ILO 183 (2000)	Maternity Protection Convention
ILO 190 (2019)	Violence and Harassment Convention
ILO MNE (2017)	Tripartite Declaration of Principles Concerning Multinational Entreprises and Social Policy
LB CC (2022)	Landbell Group Code of Conduct
OECD (2011)	Guidelines for Multinational Enterprises
OECD (2018)	Due Diligence Guidance for Responsible Business Conduct
TS.LB.001	Technical and Management Requirements for WEEE
TS.LB.003	Technical and Management Requirements for WBA
UDHR (1948)	Universal Declaration of Human Rights (10th of December 1948)
UN CEDAW (1979)	Convention on the Elimination of all Forms of Discrimination against Women
UN (1965)	Convention on the Elimination of all Forms of Racial Discrimination
UN (1989)	Convention on the Protection of the Rights of All Migrant Workers and Members of their Family
UN (1990)	Convention on the Protection on the Rights of the Child
UN (2008)	Protect, Respect and Remedy: A Framework for Business and Human Rights
UN (2011)	Guiding Principles on Business and Human Rights

DEFINITIONS

Downstream Operators	Operators to whom the output fractions, resulting from the treatment of waste, are sent to, independently of the treatment process and the tier on the supply chain.
Subcontractor	Any service provider who takes a portion of the work pursuant a take-back services contract or similar arrangement between the waste management operator and Landbell Group. Includes only the subcontractors that conduct operations and services of waste treatment (handling, storing, transport and processing), and its parts, components, or materials.
Waste	Substances or objects which are disposed of or are intended to be disposed of or are required to be disposed of by the provisions of national law.

ABBREVIATIONS & ACRONYMS

CPO	Chief Procurement Officer
EHS	Environment, Health and Safety
EoL	End of Life
GRI	Global Reporting Initiative
LB	Landbell Group
ID	Identity card
ILO	International Labour Organization
TAM	Technical Audit Manager
TS	Technical Standard
UN	United Nations
WBA	Waste Batteries and Accumulators
WEEE	Waste of Electric and Electronic Equipment

DESCRIPTION

Management System	
Minimum Requirements	**Additional Requirements**
Issues of Context	
Comply with local laws and regulations related to Human Rights.	When and where national law does not provide adequate guidance, apply the principles of the International Convention relating to Human Rights (ILO/UN) and the requirements described in this TS.
Provide evidence of compliance with all such laws, regulations, and standards upon reasonable written notice.	
Code of Conduct and Policies	
Define, communicate, and keep updated a Human Rights Code of Conduct to meet the respect of human rights responsibility.	Human Rights Code of Conduct must include, as a minimum, the following commitments: ▪ Compliance with all applicable laws, statutory and specific contractual requirements. ▪ Respect relevant International Recognized Human Rights conventions, standards, and guidelines. ▪ Remediating risks of causing or contributing to Human Rights abuse. ▪ Continual improvement.
Make available the Human Rights Code of Conduct to all stakeholders and cascade it down to the downstream vendors.	

Management System	
Define and communicate, internally and externally, a whistleblowing policy and program to allow employees to raise concerns regarding breach of law and/or breach of any of the human rights code of conduct requirements to the public interest, namely modern slavery. The whistleblowing policy shall be monitored and evaluated (via appropriated KPI´s) and revised regularly to ensure its effectiveness and improvement.	The whistleblowing policy and program must: ▪ Be clear and concise, defining what constitutes whistleblowing, how to report a concern, the process for handling reports, and the protection that whistleblowers will receive. ▪ Keep confidential the identity of the whistleblower and ensure no retaliation for reporting concerns. ▪ Define mandatory training for all employees on the policy, including what constitutes whistleblowing, how to report a concern, and what protections they will receive. ▪ Include an effective reporting system for receiving, tracking, and investigating whistleblower reports. ▪ Investigate reports promptly and thoroughly and take appropriate action to address any wrongdoing.
Due Diligence	
Carry out and keep updated a due diligence process to identify investigate, prevent, assess, and mitigate adverse Human Rights impacts: ▪ Caused directly by your operations and activities, or ▪ Linked to your operations, products, and services by a business relationship. ▪ Appropriated to the size and nature/context/evolution of the operations of the organization.	Provide evidence of the due diligence process upon reasonable written notice.
Remediation	
Where due diligence concluded that the organization have caused or contributed to adverse Human Rights impacts provide remediation for or cooperate in their remediation, though legitimate processes.	Appropriate action will vary according to the extent of the organization leverage in addressing the adverse impact. Remediation of Human Rights should be effectively integrated across appropriate level and functions within the organization and using the adequate processes for acting (internal decision making, budget allocation, oversight controls, etc.).
Firstly, seek to prevent and mitigate the most severe Human Right impacts or where the delayed response would make them irremediable.	
Establish a process to act upon the findings, track responses and communicate how impacts are addressed. To ascertain that adverse Human Rights impacts are being addressed, the effectiveness of the response shall be tracked.	Evidence of the remediation follow-up, closure and effectiveness shall be available.
Perform self-evaluations/audits/inspections to ensure that the activities are completed in accordance with legal, statutory, and contractual/customer requirements.	*Be cooperative and available for periodic audits conducted directly or indirectly by HH, and share any evidence needed to demonstrate compliance with the present TS.*
Documentation and Record Management	
Maintain procedures and other documentation to demonstrate compliance with the Human Rights Code of Conduct and with applicable legal requirements.	Human Rights information is to be disclosed to Landbell Group as appropriated and needed.
Keep critical records for 5 years unless a higher period is specified by applicable law/contract requirements.	*Falsification of records or records showing a misrepresentation of reality is not tolerated.*
Records shall be legible, available, and/or easily retrievable in hard copies or digital format.	*Maintain an adequate and periodical backup. Digital copy backups shall be kept off-site or by using a cloud environment.*

Downstream Network	
Minimum Requirements	**Additional Requirements**
Selection	
Evaluate your downstream waste management suppliers with the aim of selecting and retaining those whose policies and practices align with your Human Rights requirements/standards.	Implement a process to communicate, within your immediate downstream network, the present TS.
Contracts/Agreements	
Maintain with all your active subcontractors and immediate downstream operators, signed contracts/agreements that reflect the following obligations: ▪ Uphold respect for Human Rights, including anti-modern slavery controls. ▪ Comply with all applicable Human Rights laws, regulations, and international standards. ▪ Comply with the present TS.	The contracts/agreements should enable: ▪ Access to active subcontractors and immediate downstream vendors sites/facilities by mandated auditors (even on behalf of the customers). ▪ Provision, as needed, of the information/documentation from the selection, qualification, control, and audit process to demonstrate compliance with the Human Rights legislation, regulations, international standards, and the present TS. ▪ Cascade down of the requirements to their immediate downstream treatment operators ensuring the same level of obligation. ▪ Cooperation in mitigation and remedy of Human Rights abuses/violations.
Audits	
Audit, your immediate downstream vendors as soon as you are aware of any Human Rights abuse/violation, including abusive labour practices.	Additionally, we encourage periodic formal reviews and/or annual audits based on a risk assessment of the immediate downstream suppliers considered high risk in what relates to Human Rights.
Maintain evidence of audit completion (audit plans/schedules, audit summary reports, audit reports, corrective action plans, and follow-up) and make them available to HH, upon request.	*The findings resulting from the audits (deviation and improvement suggestions) need to be followed and measured for their closure and effectiveness*

Environmental, Health & Safety (EHS)	
Minimum Requirements	**Additional Requirements**
Living Conditions	
Provide to all workers a safe and healthy working environment and, when applicable, safe, healthy and, dignifying residential facilities, complying with applicable local law, as a minimum.	*Potable water, dining facilities and clean toilets should be available to workers.*
Incidents and Accidents	
Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Implement a process to identify, investigate, solve (by implementing appropriate corrective actions) and control incidents and accidents occurring at the facility.	*Implement and maintain updated an annual log to track EHS incidents and accidents*
Occupational Medicine	
Provide workers adequate and regular medical surveillance to prevent occupational diseases, in accordance with risk assessment. In the case of a work accident or an occupational illness provide necessary medical treatment and facilitate the worker´s return to work.	*Ensure that medical or physical exams conducted to workers or potential workers are not used in a discriminatory way.*
Workers dealing with hazardous substances/materials of concern shall undergo periodically a medical check to investigate the level of exposure.	
Identify the workstations considered hazardous for pregnant, nursing women or workers with a medical condition and ensure that there are not exposed to the hazardousness while the medical condition is in place.	*Accommodate those workers to a non-hazardous position, while the medical condition is in place.*
Training	
Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.	

Labor Relations	
Minimum Requirements	**Additional Requirements**
Dignifying Work Environment	
Do not tolerate any form of harsh or inhumane treatment.	*No worker shall be subjected to corporal punishment, sexual, psychological, verbal harassment, or abuse.*
Workers should be treated with dignity and respect, as understood by the international community.	
Child Labor – Minimum Age	
Do not tolerate any form of child labor.	*Unless local law stipulates a higher age limit, no person younger than the age for completing compulsory education, or younger than 15, shall be employed.*
Do not allow juvenile workers to work overtime, night swifts, or in hazardous environments or to conduct dangerous operations.	*Juvenile workers are under the age of 18 years old.*
Forced or Compulsory Labour/Modern Slavery	
Do not tolerate any kind of forced, bounded, or involuntary labour. relations.	Demonstrate that you have in place adequate controls and processes to avoid modern slavery, both within the borders of own sites and network, but also at your downstream supply chain.
No employee shall be tied to the labour relation against his/her will.	
Equality of Opportunity and Treatment	
Do not allow any form of discrimination.	Any distinction, exclusion, or preference made on the basis of race, colour, sex, religion, political opinion, national extraction, or social origin in all aspects of work should not be applied.
Non-Discrimination is applicable, but not limited to, hiring, advancement, compensation, benefits, training, layoffs, and terminations.	Workers should be able to develop their potential to the full and reap economic rewards based on merit.
Wages and Benefits	
Exceed or match wages, including overtime and benefits, as required by applicable law.	*Wages shall not be deducted as a fine or penalty under any disciplinary practice unless regulated under a collective bargaining agreement or recognized by law.*
Pay wages at regular intervals, to ensure workers may subsist and provide dignifying living conditions for themselves and their families.	In cases where partial payment of wages is in kind, the value of such allowances should be fair and reasonable. Workers shall be free to dispose of their wages as they choose.
Provide workers an understandable pay slip.	*Pay slips should include information on the details of wages and benefits calculations (e.g. overtime, bonuses, deductions).*
Apply the principle of equal remuneration, Equal Pay for Equal Work, without discrimination.	The principle of equal remuneration for men and women workers for work of equal value should be applied.
Labour Agreements	
Ensure that all labour relations are covered by written employment agreement/contract describing the terms and conditions of employment.	*The employment agreement/contract should be written down in a language understandable by the employee and a full signed copy given to the employee.* *All amendments to the terms and conditions of the employment are fully and freely consent and documented.*
Garantee that all workers can terminate their labour relationship, upon reasonable notice and withouth a penalty.	Workers shall not pay for any recruitment or job onboarding fees. No personal documentation (ID cards, passports, visas, etc.) shall be retained from workers.

Labor Relations	
Security of Employment	
Comply with the legal limits for usage of temporary, dispatch and/or outsourced labour.	Avoid the use of excessive use of flexible employment contracts (e.g., repeated short-term contracts).
Avoid arbitrary dismissal procedures. Ensure that dismissals are fair and used as a last resort and only if there is a valid reason for such termination connected with the worker's capacity or conduct.	Reasons for dismissal not considered valid include those based on: ▪ Union membership or participation in union activities. ▪ The filing of a complaint against an employer. ▪ Race. ▪ Colour. ▪ Sex. ▪ Marital status. ▪ Family responsibilities. ▪ Pregnancy. ▪ Religion. ▪ Political opinion. ▪ National extraction or social origin. ▪ Temporary absence due to illness and during maternity leave.
Maternity Protection	
Entitled women, absent from work on maternity leave, to a cash benefit which ensures that they can maintain themselves and their child in proper conditions of health and with a suitable standard of living.	Such benefit shall be no less than stipulated in corresponding legislation.
Employment of a woman during pregnancy or absence on maternity leave, or during a period following her return to work, should not be terminated except on grounds unrelated to pregnancy, childbirth, and its consequences, or nursing.	Women returning to work must be returned to the same or an equivalent position paid at the same rate.
Migrant Workers	
Ensure the recruitment of foreign migrants' workers who are legally permitted to work.	*Equivalent working conditions during employment should be provided to foreign migrant workers, such as:* ▪ *Contract terms & conditions.* ▪ *Compensation package (payroll and fringe benefits).* ▪ *Appropriate work conditions/infrastructures.* ▪ *Training opportunities.* ▪ *Freedom of labour contract termination.* ▪ *No extra-charges for employment.*
Working Time	
Comply with the maximum admissible by law for working hours, including overtime.	*Working time shall never exceed 60 hours per week, including paid overtime.*
Accommodate the mandated rest days, working breaks, holidays, vacations, and leaves.	*In the absence of local applicable regulations ensure workers are allowed at least to take one day off every seven days.*
Freedom of Expression	
Respect the right of every worker to freedom of thought, conscience, and religion.	
Respect the right of every worker to freedom of opinion and expression.	This includes the freedom to hold opinions without interference and to seek, receive and impart information and ideas.
Right for Privacy or Reputation	
No worker shall be subjected to arbitrary interference with his privacy, family, home, or correspondence, nor to attacks upon his honour and reputation.	
Freedom of Association and Collective Bargaining	
Respect the worker's right to collectively bargain.	*Allow all workers to exercise their legal rights to form, join or refrain from joining organizations representing their interests as workers.*
Honour the worker´s right to freedom of peaceful assembly and association.	No worker shall be compelled to belong to an association.
Modern Slavery Awareness	
Organize regular and documented modern slavery awareness sessions, namely, how to identify/confirm that the employee is	Awareness sessions must include the entire workforce (employees and management): ▪ Effective and temporary employees.

there freely and without fear of mental and bodily harm and how to reduce the risks of suspected forced labour.	▪ Part-time and full-time employees.
Communication, Consultation and Grievance Process	
Implement legitimate engagement workers mechanisms that allows workers to raise Human Rights concerns, and suggestions for improvement and support workers' participation on Human Rights due diligence.	Facilitate regular and proactive Human Rights communication. Workers should have the right to refuse to work in imminent seriously danger working environments.
Put in place a confidential, anonymous, effective mechanism available to all workers to report grievances without the fear of reprisal (e.g., unethical, unfair treatment).	*The grievance process should cover:* ▪ *Reporting, processing, and investigation.* ▪ *Implementation plan.* ▪ *Follow-up for closure and effectiveness.* ▪ *Appeal procedure.*
	The established grievance mechanism should abide to the following minimum principles: ▪ Transparent - keeping the parties informed about its progress and providing sufficient information about the mechanism's performance (e.g., average length of time to resolve grievances and number of reported grievances vs remediated ones) to build confidence in its effectiveness. ▪ Predictable - providing a clear and known procedure with indicative time frame for each stage, clarity on the types of outcomes available and means of monitoring implementation. ▪ Accessible – Detailed on how workers access the grievance process and how they are protected from retaliation. ▪ Based on engagement and dialogue – explaining how workers who submitted the grievance are included in the resolution process

Social Responsibility	
Minimum Requirements	**Additional Requirements**
Stakeholders Interests	
Implement a process to ensure effective and open feedback, consultation and/or dialogue with customers, workers, suppliers, community, and other stakeholders, related to the business and operations.	
Encourage your workers to participate in community social responsibility activities and provide them the conditions for that.	

LANDBELL GROUP is an international supplier of service and consulting solutions for environmental and chemical compliance. Our aim is to reduce the complexity of extended producer responsibility legislation, as well as other product- and packaging- related requirements for producers and distributors. In everything we do, we seek to provide our customers with the most competitive solutions in terms of service quality, compliance and cost.

At LANDBELL GROUP, we prepare our clients for the uncertainties to come. We help them unlock the value of the circular economy and strive to be their best partner on the journey to a more sustainable future.

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