

# Technip Energies Supplier & Subcontractor Practical Guidance on Human Rights

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Technip Energies is fully committed to respecting and conducting their business in compliance with all internationally recognized human rights standards, as per our Global Human rights Policy, including those set out in the Universal Declaration of Human Rights and the International Labor Organisation Declaration on Fundamental Principles and Rights at Work and have an approach to human rights consistent with the United Nations Guiding Principles on Business and Human Rights.

The Suppliers and Subcontractors are responsible for respecting the same rights, ensuring contractual requirements and monitoring that their own supply chains comply with the same principles. At a minimum, the Supplier and Subcontractors should consider:

## Ethical recruitment

- Engaging in ethical recruitment practices and upholding fair employment practices
- Prohibiting any form of forced labor, human trafficking and illicit forms of child labor

## Fair labour practices

- Ensuring fair labor practices and complying with all applicable laws regarding employment, working hours and wages and protecting the rights of migrant workers
- Developing an equal opportunity employment environment that is free from any form of discrimination, harassment or violence and promoting a diverse and inclusive workplace
- Respecting our employees' rights to freedom of association and collective bargaining
- Protecting those who can either directly or indirectly be affected by our business activities by maintaining a safe, healthy and secure workplace

## Right to effective remediation

- Ensuring a confidential and anonymous channel for employees to report potential breaches of these expectations
- Encouraging employees and others to use these channels and report concerns and ensuring remediation is implemented as appropriate
- Promoting a zero-tolerance policy on retaliation against anyone for reported suspected violations of your policies or Code of Business Conduct as applicable

The purpose of this document is to be a practical guidance to improve our value chain management systems and supply chain monitoring implementing these requirements outlined in this guide having active links to tool kits and templates. Note that this Guide does not contain any legal advice. Each company is fully and solely liable for their own. We recognize that our supply chain vary in size, having its own compliance and human rights policies, which can be equivalent or even more robust than ours.

# Ethical Recruitment: Forced labour and recruitment fees

**Requirement:** The Suppliers and Subcontractors shall neither use nor contribute forced or compulsory labour, ensure that recruitment fees and associated costs are not borne by the workers; and not withhold workers' passports or personal documents. A contractual requirement and monitoring along the supply chain to cascade the same principles for their own employees is strongly suggested, particularly if you contract with manpower agencies.

**Purpose:** This requirement prohibits all forms of forced labour and ensures that workers are hired lawfully and in a fair and transparent manner that respects their dignity and human rights.

## Guidelines for implementation

- You must recruit workers through **ethical and legal means** whereby all recruitment must be free from discrimination and all forms of involuntary labour, slavery and trafficking.
- You should **ensure a 'no-fee' recruitment policy**, where workers are not charged any **fees or related costs for recruitment or placement**. These fees and related costs refer to *any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection (ILO)*. Related costs include travel from place of origin to the workplace, the processing of all administrative documents (such as visa and medical check-up).
- You must **not withhold a worker's passport or personal documents**. You should instead provide workers with facilities with **lockable, secure and individual storage** that workers can access at any time to store their passports and personal documentation. You should ensure that that **workers are free to refuse their contract**, cancel and change their employment. Where appropriate, you should **provide home travel** at the end of the worker's employment contract.
- You should **ensure workers have freedom of movement** outside normal working hours, unless there are legitimate safety or security issues that might threaten the health, safety or well-being of the workers. Where possible, you should hire workers directly. If this is not possible, you should **conduct due diligence of recruitment agencies** to ensure they comply with these requirements.

## USEFUL TOOLS



- [ILO: General principles and operational guidelines for fair recruitment and Definition of recruitment fees](#)
- [IHRB: Responsible Recruitment Register](#)
- [B4IG: Recruitment policy template](#)
- [B4IG: Recruitment costs and fees matrix](#)
- [B4IG: Recruitment services agency agreement template](#)
- [B4IG: Recruitment agency inspection checklist template](#)
- [B4IG: Passport consent form template](#)
- [B4IG: Employment offer template](#)
- [B4IG: Employment contract template](#)
- [B4IG: Recruitment fee investigation checklist template](#)
- [B4IG: Recruitment fee reimbursement policy template](#)
- [IOM: Fair and ethical recruitment due diligence toolkit](#)

# Ethical Recruitment: Children and young workers

**Requirement:** The Suppliers and Subcontractors shall not employ any workers below 15 years of age or the legal prescribed minimum age (if higher) and protect workers of ages 15-17 from work which is likely to harm their health, safety or morals, or that interferes with their mandatory schooling. Suppliers and Subcontractors shall establish systems to effectively implement and track these requirements.

**Purpose:** This requirement prevents and addresses any adverse impact on children's human rights by ensuring that Suppliers and Subcontractors do not employ children under the minimum age for employment or allow children to be engaged in hazardous work which may harm their health, safety or morals or expose them to abuse.

## Guidelines for implementation

- You should only employ under-18s who have reached the **minimum age** for employment as set either by national law or in the ILO conventions (whichever offers the greatest protection to young people).
- You must ensure that workers aged 13 -15 are only doing '**light work**' (*ILO, page 3*) outside school hours or during school holidays, in accordance with national legislation. This may require parental consent.
- You **must not employ children under 18 to undertake hazardous work** (which should normally be defined in national legislation, *ref to ILO page 2*). This refers to work likely to harm the health, safety or morals of children.
- You should **not permit under 18s to work long hours, overtime or during the night**. Long hours or nights shifts are considered to be harmful to children and are likely to affect school attendance. At a minimum, you should ensure that young workers have at least 12 hours of rest each day and one day off per week.
- You should **keep records of dates of birth** verified by official documentation (in compliance with national age documentation legislation).

## USEFUL TOOLS



- [ILO Convention at glance: Minimum age](#)
- [ILO Convention at glance: Hazardous work for children](#)
- [EBRD: Guidance note on child labour](#)
- [EBRD: Guidance note on children, young people and work](#)
- [Global Compact: Children's Rights and Business Principles](#)

# Fair labour practices: Employment standards

**Requirement:** The Suppliers and Subcontractors provides all workers with compensation that is equivalent to the most beneficial of legally required minimum standards, including minimum wages, overtime, sick leave and annual holidays, as well as parental leave and mandatory benefits. You shall adhere to all applicable laws regarding working hours, and refrain from imposing working and overtime hours that are excessive and ensure that conditions of employment are transparent and agreed upon in writing prior to commencing work.

**Purpose:** This requirement ensures that Suppliers and Subcontractors uphold at least the minimum standards in regards to compensation, working hours and conditions of employment.

## Guidelines for implementation

- You should **pay wages in full and on time** for ordinary and overtime hours and paid leave, and without lawfully unsanctioned deductions.
- You should ensure that **all employees are made aware** of the key terms of their employment prior to commitment to work, usually in the form of a written contract for employment.
- You should ensure that **working hours and rest periods** are compliant with national legislation and any collective agreements, and that all overtime work is carried out voluntarily. In the absence of local laws, you should aim to meet the goals set out in the **ILO Convention on hours of work and overtime** (where the regular working week does not exceed 48 hours), and that the sum of regular and overtime hours does not exceed 60 hours.
- You should ensure that **migrant workers** are engaged on substantially equivalent terms and conditions to non-migrant works carrying out the same work.
- You should ensure that workers are paid at least the **applicable minimum wage for ordinary hours of work**, and not only paid by piece rate (e.g., per article produced).
- All work should be **compensated according to the most beneficial of legally required minimum standards**, and internationally recognised human rights standards.
- All employees should receive a **payslip** in a language they understand, which outlines each component of their compensation (e.g., wages, benefits, incentives/bonuses and any deductions).
- You should ensure that you **respect employee's leave entitlements**, including annual and parental leave, and keep records of these.
- You should provide **regular trainings** to workers on their rights, including on the conditions of employment.
- You must ensure that **conditions of employment are transparent** and agreed upon with a **written contract in a language that is understood** by the worker. This should outline the key terms of employment (i.e. working hours, overtime, pay, benefits, leave, etc).

## USEFUL TOOLS



- [ILO: Convention on hours of work and overtime](#)
- [EBRD: Guidance note on wages and working hours](#)
- [EBRD: Guidance note on employment documentation](#)

# Fair labour practices: Equality and non-discrimination

**Requirement:** The Suppliers and Subcontractors shall provide equal opportunity and treatment in employment, and not tolerate any forms of discrimination including but not limited to gender, race, colour, religion, ethnic, national or social origin, marital status, sexual orientation, political or other opinion, union membership, nationality, property, birth or other status including health status, disability, or age.

**Purpose:** This requirement ensures that employees receive fair and equal treatment by ensuring that workplace decision-making is based on personal merit rather than personal characteristics, without discrimination.

## Guidelines for implementation

- You should put in place policies and implementation procedures to **prevent discrimination on any ground**, including skin colour, race, nationality, ethnicity, social background, disabilities, gender, sexual identity and orientation, marital status, family responsibilities, union membership, property, age, political or religious conviction, or any other characteristic protected by local law or regulation.
- You should ensure that all employees have **access to equal opportunities** (including recruitment, compensation, advancement, promotion, rewards and benefits, training, discipline, termination and retirement). You should ensure that these policies are **communicated** to all managers and staff, and that managers are **trained** in how to apply these policies consistently.
- You should ensure that **men and women receive equal remuneration**, not only for carrying out the same work, but also for carrying out work that is of an entirely different nature but of equal value in terms of the effort, skill and decision-making required.
- You should make necessary adaptations to the workplace to accommodate the needs of **workers with disabilities** and take steps to enable those workers to retain their work, unless this imposes a disproportionate burden.
- You should ensure that **job announcements**, application forms or interviews should not refer to an applicant's gender, marital status, age, race, disability or other personal characteristic that is irrelevant to the job. You should ensure that candidate selection is based on clear, pre-determined, objective criteria on what is necessary for the job in terms of experience and skill.
- You should not ask or require job applicants or workers to undertake **health or pregnancy tests** except where there is a genuine health and safety need that is closely linked to the requirements of the job.

## USEFUL TOOLS



- [ILO: Tools and resources for business on non-discrimination and equality](#)
- [EBRD: Guidance note on non-discrimination and equal opportunity](#)

# Fair labour practices: Non-harassment

**Requirement:** The Suppliers and Subcontractors shall ensure that no employee or worker is subject to physical, sexual or psychological harassment, humiliation or abuse.

**Purpose:** This requirement ensures that Suppliers and Subcontractors treat their employees with respect and that employees are not subject to physical, sexual or psychological harassment.

## Guidelines for implementation

- You should have a **zero-tolerance policy** towards any form of harassment, including physical, sexual or psychological harassment, or discrimination including gestures, language, and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- **Sexual harassment** includes but is not limited to sexual assault, unwelcome physical contact, asking for sexual favours in exchange for a promised job or promotion, sharing sexually explicit pictures or asking intrusive questions about an employee's private life or body.
- **Physical harassment** includes assault (such as pushing, grabbing, shoving, tripping, slapping, biting, scratching, hitting, kicking, or throwing an object).
- **Psychological harassment** includes harassment, bullying or mobbing behaviour, making derogatory comments, giving impossible goals or deadlines, deliberately holding back information vital for effective work performance.
- You should ensure that **disciplinary practices are compliant with international standards** and local legislation and reflected in internal policies communicated to employees.
- You should regularly provide employees with **information and training** on identified hazards and risks of violence and harassment, and associated prevention and protection measures.
- You should incorporate violence and harassment and associated psychosocial risks in the **management of Occupational safety and health**.
- You should ensure that employees are provided with a **clear and transparent framework to raise these issues**.
- You should ensure that complainants, victims, witnesses and whistle-blowers of harassment are **protected against victimisation and retaliation**.

## USEFUL TOOLS



- [ILO: Violence and Harassment Convention](#)
- [ILO: Violence and harassment at work: A practical guide for employers](#)



# Fair labour practices: Freedom of association and collective bargaining

**Requirement:** The Suppliers and Subcontractors shall recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining and neither disadvantage nor prefer members of employee organizations or trade unions. In places where these rights are restricted, we expect Suppliers and Subcontractors to still ensure effective worker-employer collaboration.

**Purpose:** This requirement ensures that employees' right to freedom of association are respected by being able to form or join trade unions and engage in collective bargaining.

## Guidelines for implementation

- **You should respect workers' right to freedom of assembly and association**, to organize and to collective bargaining and to form trade unions, as well as their right not to do so.
- If the right to freedom of association is restricted under law, you should recognize the right of workers to develop **alternative means for independent and free association** and to communicate and promote their rights and welfare.
- You **must not interfere with workers' rights to form or join a workers' organization**, for example, by favoring one workers' organization over another or unreasonably restricting access to workers by representatives of such organizations.
- You must **not discourage workers from forming or joining** a workers' organization, or discriminate or retaliate against workers who attempt to form or join a workers' organization. Examples of retaliation include refusing to hire workers, or dismissing, demoting or re-assigning workers in response to union activities.
- You should **ensure that workers are free to meet and discuss workplace issues** on the premises during scheduled breaks and before and after work.
- You should **inform employees of their right to elect workers' representatives**, form or join workers' organizations of their choosing and engage in collective bargaining in accordance with national law. This should be done at the time of hiring or induction.
- You should **make information on workers' representatives accessible** to all workers, for example, on a company notice board or on the company intranet.
- Where collective bargaining agreements do not cover all workers, you should offer substantially equivalent terms and conditions of employment to all workers in similar positions.

## USEFUL TOOLS



- [ILO: Freedom of Association and Protection of the Right to Organise Convention](#)
- [ILO: Right to Organise and Collective Bargaining Convention](#)
- [EBRD: Guidance note on labour and working conditions](#)
- [UN: Freedom of Association key resources](#)
- [ETI: A practical guide on freedom of association in supply chains](#)



# Right to effective remediation: Grievance mechanism

**Requirement:** The Suppliers and Subcontractors shall provide access to a confidential and anonymous mechanism for employees to report possible violations of these expectations, and encourage employees to use these channels, whilst ensuring protection of whistleblowers or complainants against retaliation. Suppliers and Subcontractors should also be ready to collaborate on remediation where necessary and maintain appropriate evidence/ documentation. A contractual requirement and monitoring along the supply chain having a grievance mechanism for their own employees is requested.

**Purpose:** This requirement ensures that employees are provided with a clear and transparent framework to raise complaints (such as unethical recruitment, workplace discrimination and sexual harassment), which can then be followed up by management.

## Guidelines for implementation

- You should put in place an **effective grievance mechanism** for employees to raise workplace concerns which is available to all workers, even those who are employed on a short-term or temporary basis, without fear of retaliation.
- You should make the mechanism available to workers in their own language and with the option of complaints to be done anonymously.
- You should **inform your workers** of the grievance mechanism during recruitment, hiring and employment and promote it to all employees.
- You should **encourage employees** to report any suspected or actual cases of harassment, abuse or discrimination, or any other concern or complaint they might have.
- You should ensure that all grievances are treated seriously and consistently followed up in an **impartial, confidential and transparent** manner, including communicating back to the worker or if anonymous, via public channels.
- You should put in place specific measures to deal with grievances requiring **special protection measures** (such as reports of gender-based violence).
- You should involve an **appropriate level of management** and address concerns promptly, using an understandable and transparent process.
- You should provide regular trainings to workers on their rights, including on the conditions of employment and accommodation and to the subcontractors they work with.

## USEFUL TOOLS



- [B4IG: Grievance form template](#)
- [B4IG: Grievance flow chart](#)
- [IOM: Grievance and remediation monitoring tool](#)
- [IOM: Grievance and remediation management tool](#)