Juvenile Labor Policy and Expectations

Introduction

Cisco has had a long-standing commitment to uphold and respect the human rights of all people, wherever we operate. In our Global Human Rights Policy, Cisco commits to uphold the eight core International Labour Organization (ILO) Core Conventions, including Convention 182 on the Worst Forms of Child Labour (1999), Convention 138 on Minimum Age (1973), and Convention 29 on Forced Labour (1930) and its 2014 protocol. Our approach to uphold this commitment is informed by internationally recognized standards outlined within the United Nations Guiding Principles on Business and Human Rights ("UN Guiding Principles"). Cisco's approach to identifying, preventing, and mitigating child labor risks is further informed by the *ILO-IOE Child Labour Guidance Tool for Business*.

In addition to holding ourselves and our employees accountable to this commitment, we expect partners, suppliers, and contractors to also follow in our footsteps. The Supplier Ethics Policy outlines our requirements for conducting business with integrity, while our Cisco Supplier Code of Conduct addresses specific standards in the areas of labor, health and safety, environment, ethics and management systems. We expect Suppliers to adopt responsible business practices and governance structures that promote respect for human rights that are consistent with the UN Guiding Principles. Protecting the rights of workers who are vulnerable to exploitation around the world is a priority for Cisco. Suppliers must implement policies and processes to identify, prevent, mitigate, and remediate human rights impacts on the vulnerable workers who could be affected.

This document outlines Cisco's policies and minimum requirements for Suppliers to uphold the human rights of children, juvenile or young workers, students, interns, and apprentices. It also lays out our policies and requirements for Suppliers to institute ethical practices when managing and employing these vulnerable workers. Many countries have ratified ILO Conventions or have enacted laws that aim to protect these types of workers. The contents of this document are not intended to be legal advice; Suppliers are expected to ensure that they comply with employment laws and legal remediation procedures dictated by the jurisdictions where they operate, including when the mandatory applicable law imposes stricter or more onerous obligations on Suppliers than this policy. In cases where the law is silent or allows practices that violate Cisco policies, Suppliers are expected to follow this policy. Cisco does not tolerate retaliation against workers or worker representatives. If Suppliers find themselves non-conformant to this policy, they should not terminate workers' contracts, but work to remediate and address impacts on the workers affected.

Child Labor

"Child Labor" refers to workers who are under the age of 15, under the legal age to work, or under the age for completing compulsory education, whichever is greatest.

Suppliers must have a policy prohibiting the use of Child Labor and institute effective management system procedures that prevent children from being employed. Suppliers must have an adequate process for verifying age and identification including visual verification of a government recognized photographic identification document.

In the case that documents alone cannot verify age and identification, Suppliers may employ the following as cross-verification:

- Medical examination prior to employment (that is culturally sensitive and age appropriate)
- Written documents and affidavits
- Certificate indicating completion of compulsory schooling

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Suppliers must have procedures that facilitate the immediate remediation and protection of the well-being of children, in case they are found working onsite. At a minimum, procedures must include:

- Immediate removal from production lines and placement in a safe location
- Child returned to his/her family or appropriate guardians
- Child enrolled in school until they complete compulsory schooling or meet the legal age to begin work
- Support for the child and family with the equivalent of the child's income until legally eligible to work

Cisco's priority is to ensure that any solution must improve the child's situation and that the child is not made more vulnerable to abuse. Some relevant legal and procedural references are provided in Table 1.

Table 1. References regarding Prohibition and Remediation of Child Labor

Reference and Hyperlink
ILO Convention 138 (April 28, 1999) and ILO Convention 182 (August 8, 2002) *ILO Conventions Ratified by China*
U.S. Tariff Act of 1930 (19 U.S.C. § 1307) *Convict-made goods; importation prohibited*
Rules Prohibiting the Use of Child Labor (2002) of the People's Republic of China *Articles 2, 4, 6, 10, 11, 13*
Labor Law of the People's Republic of China (2018 revised) *Articles 15, 58, 64, 65, 94, 95*
Educational Law of the People's Republic of China (2015 revised) *Article 19*
Implementing Rules on Free Education Law of the People's Republic of China (1992)
Cisco Supplier Code of Conduct *Freely Chosen Employment, Young Workers*
Eliminating and Preventing Child Labour: Checkpoints for Companies (ILO, 2016)
LO-IOE Child Labour Guidance Tool for Business

Juvenile or Young Workers

"Juvenile or Young Workers" are workers who are legally allowed to work but are under the age of 18. Young workers are vulnerable to hazards because they are still developing physically and mentally and are generally less aware of risk than adults are.

Suppliers must have policies and procedures in place specific to preventing young workers from being exposed to workplace conditions that could harm their long-term health and well-being. These expectations include ensuring that workers are not placed in roles conducting hazardous work. In alignment with ILO's Worst Forms of Child Labour Recommendation, hazardous work includes but is not limited to: working with heavy loads, operating heavy machinery, working from heights, using hazardous chemicals, night work, long hours or overtime.

Suppliers must have:

- Clear risk evaluations or job hazard assessments that identify hazardous work or hazards that could cause harm
- Assigned young workers to positions that are deemed non-hazardous
- Scheduling procedures so that young workers do not work night shifts or overtime
- Conduct adequate health checks, as required

Note: Night work for Young Workers may be defined specifically by local law. Generally, night work means any consecutive period of at least 7 hours between 10PM and 7AM.

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If young workers are found conducting hazardous work or night work, workers must be immediately removed from harm and reassigned to alternative work that is age appropriate. Employers are to conduct health checks of young workers to identify and treat any occupational diseases or health risks before reassignment to another position. Some relevant legal and procedural references are provided in Table 2.

Table 2. References regarding Prohibition and Remediation of Young Workers Conducting Hazardous Work

Reference and Hyperlink
Worst Forms of Child Labour Recommendation, (ILO 1999 No. 190)
U.S. Fair Labor Standards Act *Hazardous Jobs*
Labor Law of the People's Republic of China (2018 revised) *Articles 58, 64, 65*
Regulations for the Special Protection of Juvenile Employees (1995) *Articles 3-10*
Cisco Supplier Code of Conduct *Freely Chosen Employment, Young Workers*
Eliminating and Preventing Child Labour: Checkpoints for Companies (ILO, 2016)
U.S. Department of Labor Occupational Safety and Health Administration *Young Workers Hazards*

Students, interns, and apprentices

"Students, interns and apprentices" are people who engage in employment with the intent to further their vocational skills or work study, sometimes arranged by an educational institution. Cisco supports the use of legitimate workplace learning and vocational programs, if they are managed responsibly and ethically; and provide the appropriate support and training to all student workers, interns, and apprentices. If Suppliers employ these types of workers under the age of 18, they must comply with all requirements aforementioned for managing "juvenile or young workers," in addition to the below requirements. If students, interns, and apprentices are recruited from foreign countries as part of a work study program, Suppliers must also comply with Cisco Supplier Code of Conduct on freely chosen employment for foreign migrant workers.

Suppliers who choose to hire students, interns, and apprentices must have policies and procedures in place to ensure voluntary employment and uphold the integrity of students' work education. If working with vocational schools or learning institutions to provide workplace learning programs, Suppliers are responsible for ensuring educational partners act ethically and within the relevant standards. Suppliers must:

- Conduct due diligence of educational partners to ensure program legitimacy
- Institute agreements directly with students with clear terms and specifications outlining internship scope and job duties; as necessary, institute tri-partite agreements with the worker (and legal guardian) and education institution
- Pay wages directly to students and not through an intermediary; ensure students are not subject to financial penalties or educational penalties such as loss of their school degree
- Pay students at least the same rate as full-time, entry level workers performing equal or similar tasks (unless law or legitimate collective bargaining agreement specifies otherwise)
- Assign students work that is related to their field of study or with the intent of enhancing their skills and internship goals
- Provide training and supervision appropriate for the students' age and experience; training, at a minimum, should address what is necessary to perform the job and how to maintain health and safety

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- Assure students have access to appropriate grievance mechanisms to advocate for themselves without fear of retaliation if they are subject to harmful or exploitative conditions

Learning institutions and Suppliers must not:

- Charge students internship deposits, commissions for internship remuneration, management fees, or other internship fees
- Hold students' government issued documents or IDs
- Collect student property

Some relevant legal and procedural references are provided in Table 3.

Table 3. References regarding Prohibition and Remediation of Students, Interns, and Apprentices

Reference and Hyperlink
Labor Law of the People's Republic of China (2018 revised) *Article 66, 68*
Provisions on Management of Vocational School Student Internships (2016), People's Republic of China *Articles 6-19, 32-36*
Cisco Supplier Code of Conduct *Freely Chosen Employment, Young Workers*

Reporting Ethical Concerns

Cisco regularly conducts due diligence of suppliers for their conformance to this policy. Should Suppliers suspect they are non-conformant to this policy, they are encouraged to inform Cisco and request guidance for addressing, mitigating, and remediating human rights impacts. Furthermore, Cisco encourages all employees, customers, partners, suppliers, shareholders, and stakeholders to speak up promptly about any conduct or circumstances they believe may constitute a violation of this policy or any other Cisco policy. Reports can be made using the Cisco EthicsLine tool regarding any known or suspected illegal or improper behavior relating to dealings with or on behalf of Cisco. Cisco investigates and addresses allegations brought to our attention from all channels. Issues are tracked through our incident management systems and follow corrective actions, accountability and reporting mechanisms when necessary.

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