

FSC self-assessment for the fulfillment of the basic requirements of the FSC for labor - Bulgaria

This tool has been developed for the convenience of all FSC certificate holders for traceability of production (CoC) in Bulgaria. With the publication of the standard FSC-STD-40-004 V3-1, the requirement was introduced that the holders of such a certificate prepare a self-assessment of the fulfillment of the basic labor requirements of FSC. This self-assessment is required in annual certification audits and is mandatory after 31 December 2021.

The self-assessment is designed to help CoC certificate holders effectively identify and document measures demonstrating compliance with FSC's core labor requirements including:

- The organization does not use child labor (FSC-STD-40-004 V3-1, 7.2)
- The organization has eliminated all forms of forced and compulsory labor (7.3).
- The organization ensures that there is no discrimination in the practices in the creation, implementation and termination of employment relationships (7.4).
- The organization respects freedom of association and the right to collective bargaining (7.5).

To achieve compliance with FSC's core labor requirements, certificate holders are required to develop and implement:

- Policy(s) that cover FSC's core labor requirements. This policy should be made available to affected and interested parties as well as the certification authority (1.5)
- Current self-assessment (current or similar document) and relevant documentation (1.6).

The organization can demonstrate compliance with the requirements through other certification schemes it implements (1.11). The FSC is yet to specify which such schemes it recognises.

The organization must submit a completed and signed self-assessment to its certification body prior to the scheduled audit.

The certification body will use the self-assessment when conducting the audit to verify compliance with the Standard. For its preparation, the organization should use its knowledge and experience, including on the application of national legislation.

To whom do the FSC core labor requirements apply?

FSC's basic requirements for labor are applicable to all FSC-certified organizations, as well as to companies with which the Organization has a contract for services related to FSC production, according to part 13 of Standard FSC-STD-40-004 V3-1.

Compliance with the requirements of national legislation is helpful, but not sufficient

Bulgarian legislation largely incorporates FSC's core labor requirements (see samples of relevant provisions in Annex 1), but merely listing and declaring that relevant national regulatory requirements are met is not sufficient. Certificate holders are required to demonstrate and justify how in practice they apply the relevant requirements of the legislation.

Using self-assessment

Certificate holders and organizations seeking to become certified are not required to use the self-assessment format proposed here and may substitute it with another similar tool. Use of the self-assessment format suggested here does not automatically guarantee compliance with FSC labor requirements. It is the responsibility of the organization to comply with and demonstrate compliance with the requirements.

In the self-assessment, the Organization is also required to declare that the statements made are true based on the best available information. If the organization knowingly declares false circumstances, this may lead to suspension or termination of the certificate. The questions included in the self-assessment should be answered as completely and truthfully as possible. As evidence, relevant documents and/or other materials that the auditor may request to review verifying how the declarations made correspond to the realities should also be indicated.

Document versions

Version	Date
1.0	12/04/2025

Manager: Ivaylo Vatsov

Signature:



Self-assessment of the fulfillment of the FSC basic labor requirements

Declaration: The undersigned, Ivaylo Vatsov, Manager of Europapaper Bulgaria EOOD hereby confirm that, to the best of my knowledge, the statements below are correct and true, and I am aware that knowingly submitting false information may result in non-issuance, temporary or final suspension of the certificate.

Child work

Requirement of FSC standard	Questions	Answer and evidence
7.2 The organization does not use child labor	a) Does your organization meet the requirements of clause 7.2? If yes, continue with c).	☒ Da, and we fulfill the requirements of the national legislation regarding child labor. *Microsoft Word - KODEKS na truda22 (government.bg) ☐ No, see b)
7.2.1 The Organization does not employ persons under the age of 15, or persons under the minimum age,	b) If the answer to point a) above is "no", please describe how or why your organization does not meet the requirements of clause 7.2.	
according to national or local legislation or regulations, whichever age is higher, except as set out in 7.2.2.	c) Describe how your organization certifies that the requirements of clause 7.2 are met for persons employed at the site(s) covered by the certificate.	We can demonstrate this by: When concluding contracts, a copy of the person's identity card is required, verifying (according to the EGN) that it is not child labor. Legislation: *Microsoft Word - KODEKS na truda22 (government.bg) Legislation relating to clause 7.2: Labor Code - Chapter Fifteen (SPECIAL PROTECTION OF CERTAIN CATEGORIES OF WORKERS AND EMPLOYEES (TITLE AMENDED - SG No. 100 OF 1992) Section I. Special Protection of Minors Minimum age for employment Art. 301. (1) The minimum age for employment is 16 years. It is prohibited to employ persons under the age of 16. (2) As an exception, persons from 15 to 16 years of age may also be employed to perform work that is light and is not dangerous or harmful to health and to their proper physical, mental and moral development and the performance of which would not be an obstacle to regular school attendance or participation in vocational guidance or training programs. Legislation relating to clause 7.2.1: See 7.2 above plus: Labor Code, Art. 302 (1) Persons under the age of 16 are accepted for work after a thorough medical examination and a medical conclusion that they are fit to perform the work in question and that it will not harm their health and prevent their proper physical and mental development. (2) Persons under the age of 16 are accepted for work with the permission of the labor inspection for each individual case and according to the procedure specified in Ordinance No. 6 on the terms and conditions for granting work permits to persons under the age of 18. Legislation relating to clause 7.2.2: See 7.2 above plus: Labor Code (Art. 301) and Ordinance on the work of persons under the age of 15 (Art. 1).
7.2.2 In countries where national legislation or regulations permit the employment of persons between the ages of 13 and 15 to carry out work that is		

light, such employment should not be an obstacle to regular school attendance, nor should it be harmful to child health or development . Where compulsory school attendance is required by law, children may only work outside school hours, within normal working hours during the day. 7.2.3 Persons under the age of 18 shall not be employed to carry out dangerous and difficult activities, except for the purpose of training within the limitations provided for in national legislation or other regulations.	Persons under the age of 15 who may be employed only in the field of arts (circuses, filming, preparation and performance of theatrical and other performances.) Legislation relating to clause 7.2.3: See 7.2 above plus: Labour Code: Art. 304 (1) It is prohibited to accept persons from 16 to 18 years of age in jobs that are difficult, dangerous or harmful to health and to their proper physical, mental and moral development. (2) Persons aged 16 to 18 are accepted for work after a thorough preliminary medical examination and a medical conclusion, which establishes their fitness to perform the relevant work. (3) Persons aged 16 to 18 are accepted for work with the permission of the labor inspectorate on a case-by-case basis. Labor Code (Art. 304) and Ordinance No. 6 on the terms and conditions for granting work permits to persons under the age of 18 (Art. 8): Persons under the age of 18 are prohibited from work that is: 1. beyond their physical or mental capabilities; 2. involving harmful effects of agents that are toxic, carcinogenic, cause hereditary genetic damage or damage to the fetus during pregnancy, or that in any other way damage human health upon prolonged exposure; 3. in a radiation environment; 4. at extremely low or high temperatures, noise or vibrations; 5. related to the risk of occupational accidents which it is assumed cannot be realized or avoided by the minor due to his physical or mental immaturity. The prohibition applies to work that is carried out under the influence of physical, chemical and biological agents and to processes and types of work specified in an appendix to the Ordinance, but also when the activity performed is not on the list, but during the risk assessment, the presence of risk to the safety, health and development of persons under the age of 18. Labor Code, Art. 305 (1) The employer takes special care of the work of persons under the age of 18, creating for them reduced working conditions and conditions for acquiring a professional qualification and for its improvement. (2) The employer is obliged to inform minor workers and employees and their parents or guardians about the possible risks at work and about the measures taken to ensure healthy and safe working conditions. (3) The working hours of employees under the age of 18 are 35 hours a week and 7 hours a day in a five-day work week. Their daily and weekly working hours also include the time for acquiring a professional qualification and for its improvement, when it is carried out in the process of work. (4) Workers and employees under the age of 18 are entitled to basic paid annual leave in the amount of not less than 26 working days, including for the calendar year in which they turn 18. Ordinance No. 6, Art. 10: The provisions above may not apply to persons under the age of 18 when the work performed is necessary for their professional training and the employer has ensured: all measures to protect health and proper physical, mental and moral development; and supervision by a competent person designated by order. Legislation relating to clause 7.2.4: See 7.2 and 7.2.3 above plus: The Penal Code defines as criminal acts: Art. 142 (2) - kidnapping of a person under the age of 18. Art. 158a (among others) - recruiting, assisting, using or forcing a person under the age of 18 or a group of such persons to participate in a pornographic performance. Art. 159a - recruiting, transporting, harboring or receiving individuals or groups of people with the purpose of being used for lewd acts, for forced labor or for begging, for the removal of a body organ, tissue, cell or body fluid or to be kept in forced obedience regardless of their consent. When the act is committed against a person under the age of eighteen; or by using coercion or by misleading the person; or by kidnapping or unlawful imprisonment; or by using a dependent state; or by abuse of power or by promising, giving or receiving benefits, aggravated penalties are provided. Art. 155 and Art. 188 - inducing a person under the age of 18 to prostitution by coercion or by using a position of dependence or supervision.
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7.2.4 The organization has prohibited the worst forms of child labour.		Child Protection Act. Art. 11. (1) Every child has the right to protection against involvement in activities unfavorable to his physical, mental, moral and educational development. (3) Every child has the right to protection against being used for begging, prostitution, distribution of pornographic materials and obtaining unlawful material income, as well as against sexual violence.
d) Specify the documents or other records (and their location) by which you consider to demonstrate compliance with the requirement of clause 7.2.		Documents, records or policies demonstrating compliance with FSC's core labor requirements: (to be listed) - lists of the Organization's employed staff; - personal files of employed workers, including copies of employment contracts. - reference in the NRA system for concluded employment contracts; - Labour Code: <u>*Microsoft Word - KODEKS na truda22 (government.bg)</u> - Penal Code: Art. 142, art. 158a, art. 159a, art. 188, art. 11 <u>https://justice.government.bg/home/normdoc/1589654529#:~:text=%D0%BE%D1%82%201995%20%D0%B3.%D0%A7%D0%BB.%20142.%20(%D0%9D%D0%BE%D0%B2%20%D0%94%D0%92%2C%20%D0%B1%D1%80</u> Art. 158
e) Identify any legal obligations that you believe may prevent you from complying with the requirements of clause 7.2. Please describe them and how they affect your compliance with the requirements of clause 7.2.		There are none. Bulgarian legislation does not prevent the fulfillment of the requirements of clause 7.2. The description of the national legislation can be seen at the following link: <u>*Microsoft Word - KODEKS na truda22 (government.bg)</u>
f) Apply policy/declaration(s) made by your organization which cover the requirements of clause 7.2.		☐ Other: Comply with Europapir Group Policy <u>https://intranet/environment/Chain%20of%20Custody/ Internal%20Audit/2022 Internal%20Audit/AT Central/CLR/Mission%20Statement%20CLR.pdf</u>

Requirement of FSC standard	Questions	Answer and evidence
7.3 The organization has eliminated all forms of forced and compulsory labor.	a) Does your organization meet the requirements of clause 7.3? If yes, continue with c). b) If the answer to point a) above is "no", please describe how or why your organization does not meet the requirements of clause 7.3.	☒ Da, and we comply with the requirements of national legislation regarding forced labour. ☐ No, see b)
7.3.1 Employment relationships are voluntary and based on mutual consent, without any form of coercion or threat.	c) Describe how your organization certifies that the requirements of clause 7.3 are met for persons employed at the site(s) covered by the certificate.	We can demonstrate this by: The practices in the Organization are described, e.g.: For employment, interested candidates personally submit an application of interest. The person familiarizes himself with the requirements, rights and obligations in detail, and for this purpose he is provided with a job description, which the candidate familiarizes himself with and signs voluntarily. All employment contracts include equal notice clauses for both parties upon termination and a voluntary relationship clause. The organization does not retain original identity documents. Working hours requirements are met.
7.3.2 There is no evidence of practices indicative of forced or compulsory labor, including: • physical and sexual violence • work under personal dependence (working for the purpose of repaying a debt) • withholding wages / payment of hiring fees		Legislation relating to clause 7.3.1: Constitution of the Republic of Bulgaria: Art. 48. (3) Every citizen freely chooses his profession and place of work. (4) No one may be forced to perform forced labor. Legislation relating to clause 7.3.2: See 7.3.1 above plus: Labour Code: Art. 8 (4) Labor rights and obligations are personal. The waiver of employment rights or obligations, are invalid. Art. 61. The employment contract is concluded between the employee and the employer before starting work. Art. 118. (1) The employer or the worker or the employee may not unilaterally change the content of the employment relationship except in the cases and according to the procedure established by law. Art. 127. (2) The employer is obliged to protect the dignity of the worker or employee during the performance of the work under the employment relationship. Art. 128. The employer is obliged within the established terms (item 2.) to pay the agreed remuneration for the work performed; Art. 245. (1) In the case of conscientious performance of labor duties, the worker or employee is guaranteed the payment of labor remuneration in the amount of 60 percent of his gross labor remuneration, but not less than the minimum wage for the country. (2) The difference up to the full amount of the labor remuneration remains due and is paid additionally together with the legal interest.

	cover the requirements of clause 7.3.	https://intranet/environment/Chain%20of%20Custody/ Internal%20Audit/2022 Internal%20Audit/AT Central/CLR/Mission%20Statement%20CLR.pdf
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Discrimination in the creation, implementation and termination of employment relationships

Requirement of FSC standard	Questions	Answer and evidence
7.4 The organization guarantees that there is no discrimination in the creation, implementation and termination of employment relationships	a) Does your organization meet the requirements of clause 7.4? If yes, continue with c). b) If the answer to point a) above is "no", please describe how or why your organization does not meet the requirements of clause 7.4. c) Describe how your organization certifies that the requirements of clause 7.4 are met for persons employed at the site(s) covered by the certificate.	☒ Da, andwe comply with the requirements of national legislation regarding discrimination. ☐ No, see b)
7.4.1 Practices related to the creation, implementation and termination of employment relationships are non-discriminatory	We can demonstrate this by: The practices in the Organization are described, e.g.: Job postings include qualifications and experience requirements only. Job descriptions of employees describe their duties at work. In the same position, there is no difference in basic remuneration by gender and age, or they are within the range defined by the company. All employees have equal opportunities for promotion. The trainings we conduct (e.g. briefings on safe working conditions) include all personnel, including men and women. Legislation relating to clause 7.4: Labour Code Art. 8 (3). In the implementation of labor rights and obligations, direct or indirect discrimination based on nationality, origin, gender, sexual orientation, race, skin color, age, political and religious beliefs, membership in trade unions and other public organizations and movements, family and financial situation, the presence of mental or physical disabilities, as well as differences in the duration of the contract and the length of working hours. Legislation relating to clause 7.4.1: See 7.4 above plus: Anti-Discrimination Act Art. 12. (1) When announcing a vacancy, the employer has no right to set discriminatory requirements. (2) Before concluding the employment contract, the employer has no right to ask the applicant for information about the signs related to discrimination. Art. 13. (1) The employer ensures equal working conditions regardless of signs of discrimination.	

	Art. 14. (1) The employer shall ensure equal remuneration for equal or equal work. Art. 15. (1) The employer shall provide workers with equal opportunities for professional training and improvement of professional qualification and retraining, as well as for professional growth and growth in position or rank, applying the same criteria when evaluating their activity. Art. 26. Persons have the right to equal conditions of access to a profession or activity, the opportunity to exercise them and to develop them in them.	
d) Specify the documents or other records (and their location) by which you consider to demonstrate compliance with the requirement of clause 7.4. e) Identify any legal obligations that you believe may prevent you from complying with the requirements of clause 7.4. Please describe them and how they affect your compliance with the requirements of clause 7.4.	Documents, records or policies demonstrating compliance with FSC's core labor requirements: (to be listed) - published job advertisements; - lists of the Organization's employed staff; - personal files of employed workers, including employment contracts ; job description; - inquiry in the NRA system for registration of concluded employment contracts; There are none. Bulgarian legislation does not prevent the fulfillment of the requirements of clause 7.4. The description of the national legislation can be seen at the following link: <u>*Microsoft Word - KODEKS na truda22 (government.bg)</u>	Art. 14. (1) The employer shall ensure equal remuneration for equal or equal work. Art. 15. (1) The employer shall provide workers with equal opportunities for professional training and improvement of professional qualification and retraining, as well as for professional growth and growth in position or rank, applying the same criteria when evaluating their activity. Art. 26. Persons have the right to equal conditions of access to a profession or activity, the opportunity to exercise them and to develop them in them.
f) Apply policy/declaration(s) made by your organization which cover the requirements of clause 7.4.	☐ Other: Comply with Europapir Group Policy https://intranet/environment/Chain%20of%20Custody/ Internal%20Audit/2022 Internal%20Audit/AT Central/CLR/Mission%20Statement%20CLR.pdf	Art. 14. (1) The employer shall ensure equal remuneration for equal or equal work. Art. 15. (1) The employer shall provide workers with equal opportunities for professional training and improvement of professional qualification and retraining, as well as for professional growth and growth in position or rank, applying the same criteria when evaluating their activity. Art. 26. Persons have the right to equal conditions of access to a profession or activity, the opportunity to exercise them and to develop them in them.

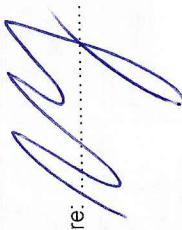
Freedom of association and right to collective bargaining

Requirement of FSC standard	Questions	Answer and evidence
7.5 The organization respects the freedom of association and the effective right to collective bargaining.	a) Does your organization meet the requirements of clause 7.5? If yes, continue with c). b) If the answer to point a) above is "no", please describe how or why your organization does not meet the requirements of clause 7.5.	☒ Yes, we fulfill the requirements of national legislation regarding freedom of association and the right to collective bargaining ☐ No, see b)
7.5.1 Employees may initiate the creation and/or become members of labor or trade union organizations of their choice.	c) Describe how your organization certifies that the requirements of clause 7.5 are met for persons employed at the site(s) covered by the certificate.	We can demonstrate this by: Other: We fulfill the requirements of the national legislation - the Labor Code and the Constitution of the Republic of Bulgaria.
7.5.2 The organization respects the full freedom of labor or trade union organizations to draw up their statutes and rules of operation.		Legislation relating to clause 7.5: Constitution of the Republic of Bulgaria: Art. 49. (1) Workers and employees have the right to associate in trade unions and unions for the protection of their interests in the field of labor and social security. Legislation relating to clause 7.5.1: See 7.5 above plus: Labour Code: Art. 4. (1) Workers and employees have the right, without prior permission, to freely form trade union organizations of their choice, to voluntarily join and leave them, complying only with their statutes.
7.5.3 The organization respects the rights of workers to participate, as well as to refrain from participating in legal activities related to the		Legislation relating to clause 7.5.2: Labour Code: Art. 33. (1) Trade union organizations have the right, within the framework of the law, to draw up and adopt their own statutes and work rules, to freely choose their bodies and representatives, to organize their management, as well as to adopt programs for their activities. (2) Trade union organizations freely define their functions and carry them out in accordance with their statutes and the law. Legislation relating to clause 7.5.3: See 7.5, 7.5.1 and 7.5.2 above plus: Penal Code: Art. 172. defines as a criminal act the deliberate obstruction of membership or non-membership in a trade union or other organization. Legislation relating to clause 7.5.4:

formation, joining and exiting of workers' organizations /union organizations/, or supporting such. The exercise of these rights is not discriminated against and/or penalized.		Labour Code: Art. 50. (1) The collective labor agreement regulates issues of labor and insurance relations of workers and employees, which are not regulated by mandatory provisions of the law. (2) The collective labor agreement may not contain clauses that are less favorable to workers than those established by law or in a collective labor agreement to which the employer is bound. Art. 51a. (1) A collective labor agreement in the enterprise is concluded between the employer and a trade union organization. (2) The draft collective labor agreement is prepared and submitted by the trade union organization. When there is more than one trade union organization in the enterprise, they present a common project. Art. 52.(1) The individual employer, the group of employers and their organizations are obliged to: 1. to negotiate with the representatives of workers and employees to conclude a collective labor agreement;... (2) In case of non-fulfilment of the obligations under the previous paragraph, the guilty employers owe compensation for the damages caused.
7.5.4 The organization participates in the negotiations with legitimate/legal ly established labor organizations and/or duly elected representatives of the workers*, including participates in negotiations and makes the necessary efforts to conclude a collective labor agreement.	d) Specify the documents or other records (and their location) by which you consider to demonstrate compliance with the requirement of clause 7.5.	Legislation relating to clause 7.5.5: Labour Code: Art. 57. (1) The collective labor agreement applies to workers and employees who are members of the trade union organization - a party to the agreement. (2) Workers and employees who are not members of a trade union organization, a party to the contract, may join the collective labor agreement concluded by their employer with a written application to him or to the management of the trade union organization that concluded the contract. Art. 59. In the event of non-fulfilment of the obligations under the collective labor agreement, claims may be brought before the court by the parties to it, as well as by any worker or employee to whom the collective labor agreement applies.
7.5.5 Collective bargaining agreements shall apply where such agreements exist.	e) Identify any legal obligations that you believe may prevent you from complying with the requirements of clause 7.5. Please describe them and how they affect your compliance with the	Documents, records or policies showing compliance with FSC's core labor requirements: Europapaper group policy is followed: https://intranet/environment/Chain%20of%20Custody/Internal%20Audit/2022 Internal%20Audit/AT Central/CLR/Mission%20Statement%20CLR.pdf There are none. Bulgarian legislation does not prevent the fulfillment of the requirements of clause 7.4. The description of the national legislation can be seen at the following link: *Microsoft Word - KODEKS na truda22 (government.bg)

	requirements of clause 7.5.	
	f) Apply policy/declaration(s) made by your organization which cover the requirements of clause 7.5.	☐ Other: Comply with Europapir Group Policy https://intranet/environment/Chain%20of%20Custody/ Internal%20Audit/2022 Internal%20Audit/AT Central/CLR/Mission%20Statement %20CLR.pdf

Manager: Ivaylo Vatsov

Signature: 

Requirement of FSC standard	Relevant provisions of national legislation
Clause 7.2	Labor Code, 1987 Art. 301. (1) The minimum age for employment is 16 years. It is prohibited to employ persons under the age of 16. (2) As an exception, persons from 15 to 16 years of age may also be employed to perform work that is light and is not dangerous or harmful to health and to their proper physical, mental and moral development and the performance of which would not be an obstacle to regular school attendance or participation in vocational guidance or training programs.
Clause 7.2.1	See 7.2 above plus: Labor Code, Art. 302 (1) Persons under the age of 16 are accepted for work after a thorough medical examination and a medical conclusion that they are fit to perform the work in question and that it will not harm their health and prevent their proper physical and mental development. (2) Persons under the age of 16 are accepted for work with the permission of the labor inspection for each individual case and according to the procedure specified in Ordinance No. 6 on the terms and conditions for granting work permits to persons under the age of 18.
Clause 7.2.2	See 7.2 above plus: Labor Code (Art. 301) and Ordinance on the work of persons under the age of 15 (Art. 1): Persons under the age of 15 who may be employed only in the field of arts (circuses, filming, preparation and performance of theatrical and other performances.)
Clause 7.2.3	See 7.2 above plus: Labour Code: Art. 304 (1) It is prohibited to accept persons from 16 to 18 years of age in jobs that are difficult, dangerous or harmful to health and to their proper physical, mental and moral development. (2) Persons aged 16 to 18 are accepted for work after a thorough preliminary medical examination and a medical conclusion, which establishes their fitness to perform the relevant work. (3) Persons aged 16 to 18 are accepted for work with the permission of the labor inspectorate on a case-by-case basis. Labor Code (Art. 304) and Ordinance No. 6 on the terms and conditions for granting work permits to persons under the age of 18 (Art. 8): Persons under the age of 18 are prohibited from work that is: 1. beyond their physical or mental capabilities; 2. involving harmful effects of agents that are toxic, carcinogenic, cause hereditary genetic damage or damage to the fetus during pregnancy, or that in any other way damage human health upon prolonged exposure; 3. in a radiation environment; 4. at extremely low or high temperatures, noise or vibrations; 5. related to the risk of occupational accidents which it is assumed cannot be realized or avoided by the minor due to his physical or mental immaturity. The prohibition applies to work that is carried out under the influence of physical, chemical and biological agents and to processes and types of work specified in an appendix to the Ordinance, but also when the activity performed is not on the list, but during the risk assessment, the presence of risk to the safety, health and development of persons under the age of 18. Labor Code, Art. 305 (1) The employer takes special care of the work of persons under the age of 18, creating for them reduced working conditions and conditions for acquiring a professional qualification and for its improvement. (2) The employer is obliged to inform minor workers and employees and their parents or guardians about the possible risks at work and about the measures taken to ensure healthy and safe working conditions. (3) The working hours of employees under the age of 18 are 35 hours a week and 7 hours a day in a five-day work week. Their daily and weekly working hours also include the time for acquiring a professional qualification and for its improvement, when it is carried out in the process of work. (4) Workers and employees under the age of 18 are entitled to basic paid annual leave in the amount of not less than 26 working days, including for the calendar year in which they turn 18. Ordinance No. 6, Art. 10: The provisions above may not apply to persons under the age of 18 when the work performed is necessary for their professional training and the employer has ensured: all measures to protect health and proper physical, mental and moral development; and supervision by a competent person designated by order. See 7.2 and 7.2.3 above plus: The Penal Code defines as criminal acts:
Clause 7.2.4	

	Art. 142 (2) - kidnapping of a person under the age of 18. Art. 158a (among others) - recruiting, assisting, using or forcing a person under the age of 18 or a group of such persons to participate in a pornographic performance. Art. 159a - recruiting, transporting, harboring or receiving individuals or groups of people with the purpose of being used for lewd acts, for forced labor or for begging, for the removal of a body organ, tissue, cell or body fluid or to be kept in forced obedience regardless of their consent. When the act is committed against a person under the age of eighteen; or by using coercion or by misleading the person; or by kidnapping or unlawful imprisonment; or by using a dependent state; or by abuse of power or by promising, giving or receiving benefits, aggravated penalties are provided. Art. 155 and Art. 188 - inducing a person under the age of 18 to prostitution by coercion or by using a position of dependence or supervision. Child Protection Act. Art. 11. (1) Every child has the right to protection against involvement in activities unfavorable to his physical, mental, moral and educational development. (3) Every child has the right to protection against being used for begging, prostitution, distribution of pornographic materials and obtaining unlawful material income, as well as against sexual violence.
Clause 7.3.1	Constitution of the Republic of Bulgaria: Art. 48. (3) Every citizen freely chooses his profession and place of work. (4) No one may be forced to perform forced labor.
Clause 7.3.2	See 7.3.1 above plus: Labour Code: Art. 8 (4) Labor rights and obligations are personal. The waiver of employment rights, as well as the transfer of employment rights or obligations, are invalid. Art. 61. The employment contract is concluded between the employee and the employer before starting work. Art. 118. (1) The employer or the worker or the employee may not unilaterally change the content of the employment relationship except in the cases and according to the procedure established by law. Art. 127. (2) The employer is obliged to protect the dignity of the worker or employee during the performance of the work under the employment relationship. Art. 128. The employer is obliged within the established terms (item 2.) to pay the agreed remuneration for the work performed; Art. 245. (1) In the case of conscientious performance of labor duties, the worker or employee is guaranteed the payment of labor remuneration in the amount of 60 percent of his gross labor remuneration, but not less than the minimum wage for the country. (2) The difference up to the full amount of the labor remuneration remains due and is paid additionally together with the legal interest. Art. 272. No deductions can be made from the employee's remuneration without the consent of the worker or employee (exceptions are applicable in the case of advances received, amounts overdrawn as a result of technical errors, taxes, etc.) Anti-trafficking in persons law introduces definitions for: "trafficking in persons" - is the recruitment, transfer, harboring or reception of persons, regardless of their expressed will, when carried out for the purpose of exploitation; and "exploitation" - is the illegal use of people for depravity, to take away a body organ, tissue, cell or body fluid from the victim, to carry out forced labor, to beg or to keep in forced submission, to place in slavery or in a position, similar to slavery. Penal Code: Defines as a criminal act. Art. 153. Collusion with a person by forcing him to do so by using his official or material dependence on him. Art. 159a. The recruitment, transportation, harboring or reception of individuals or groups of persons for the purpose of being used for lewd acts, for forced labor or for begging, for the removal of a body organ, tissue, cell or body fluid, or for the purpose of being held in forced servitude regardless of their consent. When the act is committed: against a person under the age of eighteen; by using coercion or by misleading the person; by kidnapping or unlawful imprisonment; by using state of dependence; by abuse of power; by promising, giving or receiving benefits; aggravated penalties are provided for. Art. 159c. The use of a trafficked person for lewd acts, for forced labor or begging, for the removal of a body organ, tissue, cell or body fluid, or to be held in forced servitude without consent.
Clause 7.4	Labour Code Art. 8 (3). In the implementation of labor rights and obligations, direct or indirect discrimination based on nationality, origin, gender, sexual orientation, race, skin color, age, political and religious beliefs, membership in trade unions and other public organizations and movements,

Clause 7.4.1	family and financial situation, the presence of mental or physical disabilities, as well as differences in the duration of the contract and the length of working hours. See 7.4 above plus: Anti-Discrimination Act Art. 12. (1) When announcing a vacancy, the employer has no right to set discriminatory requirements. (2) Before concluding the employment contract, the employer has no right to ask the applicant for information about the signs related to discrimination. Art. 13. (1) The employer ensures equal working conditions regardless of signs of discrimination. Art. 14. (1) The employer shall ensure equal remuneration for equal or equal work. Art. 15. (1) The employer shall provide workers with equal opportunities for professional training and improvement of professional qualification and retraining, as well as for professional growth and growth in position or rank, applying the same criteria when evaluating their activity. Art. 26. Persons have the right to equal conditions of access to a profession or activity, the opportunity to exercise them and to develop them in them.
Clause 7.5	Constitution of the Republic of Bulgaria: Art. 49. (1) Workers and employees have the right to associate in trade unions and unions for the protection of their interests in the field of labor and social security.
Clause 7.5.1	See 7.5 above plus: Labour Code: Art. 4. (1) Workers and employees have the right, without prior permission, to freely form trade union organizations of their choice, to voluntarily join and leave them, complying only with their statutes.
Clause 7.5.2	Labour Code: Art. 33. (1) Trade union organizations have the right, within the framework of the law, to draw up and adopt their own statutes and work rules, to freely choose their bodies and representatives, to organize their management, as well as to adopt programs for their activities. (2) Trade union organizations freely define their functions and carry them out in accordance with their statutes and the law.
Clause 7.5.3	See 7.5, 7.5.1 and 7.5.2 above plus: Penal Code: Art. 172. defines as a criminal act the deliberate obstruction of membership or non-membership in a trade union or other organization.
Clause 7.5.4	Labour Code: Art. 50. (1) The collective labor agreement regulates issues of labor and insurance relations of workers and employees, which are not regulated by mandatory provisions of the law. (2) The collective labor agreement may not contain clauses that are less favorable to workers than those established by law or in a collective labor agreement to which the employer is bound. Art. 51a. (1) A collective labor agreement in the enterprise is concluded between the employer and a trade union organization. (2) The draft collective labor agreement is prepared and submitted by the trade union organization. When there is more than one trade union organization in the enterprise, they present a common project. Art. 52. (1) The individual employer, the group of employers and their organizations are obliged to: 1. to negotiate with the representatives of workers and employees to conclude a collective labor agreement;... (2) In case of non-fulfilment of the obligations under the previous paragraph, the guilty employers owe compensation for the damages caused.
Clause 7.5.5	Labour Code: Art. 57. (1) The collective labor agreement applies to workers and employees who are members of the trade union organization - a party to the agreement. (2) Workers and employees who are not members of a trade union organization, a party to the contract, may join the collective labor agreement concluded by their employer with a written application to him or to the management of the trade union organization that concluded the contract. Art. 59. In the event of non-fulfilment of the obligations under the collective labor agreement, claims may be brought before the court by the parties to it, as well as by any worker or employee to whom the collective labor agreement applies.

Appendix 2. Sample questions for completing the self-assessment

The FSC also provides the following open-ended questions that may be useful to the organization when completing the self-assessment. The questions are divided into the four categories included in the basic job requirements. The level of detail of the responses depends on the location of the organization's manufacturing/commercial/warehouse or other assets, the risk assessment and the overall operating environment. This list of questions is not exhaustive.

Category	A question
Child work	• What is the legal minimum age in the area of your activity?
	• What measures have you taken to ensure that you do not use child labor in your business?
	• Do you record the age (date of birth) of your workers and how do you check that it is correct? Do you check IDs?
	• If there are legal or regulatory constraints that you understand would limit your ability to meet the requirement, describe how you mitigate those constraints.
	• If you employ workers under the age of 18, describe what measures you have taken to ensure that they are not doing dangerous or hard work. If there are training and education requirements, indicate the relevant documents.
Forced labor	• Does the law allow the employment of children between the ages of 13 and 15? Do you hire children this age? If the answer is yes to both, state the measures you have taken to ensure that they do only light work that is not harmful to the child's health or development and that does not interfere with school activities.
	• Describe your hiring/employee and contracting practices to demonstrate compliance.
	• Do you make loans or advances that would require a worker/employee to work outside of legal or contractual agreements? If so, can you describe how you mitigate the risk of working to pay back a loan?
	• How do you ensure that no money is withheld from the worker/employee when starting work?
	• How do you ensure that there is no threat of denunciation of workers (eg exposure of employed expats) to the authorities?
Discrimination	• How do you ensure that wages and other working conditions are not discriminatory?
	• Is there gender/age equality in the organization?
	• Do you have an ethnically diverse workforce?
	• Do you have non-discrimination policies?
	• Do you provide equal opportunity for promotion to all employees?
Freedom of association and right to collective bargaining	• How do you ensure that applicants have equal employment opportunities?
	• If there are legal or regulatory restrictions that you understand would limit your ability to comply with those requirements, describe how you mitigate those restrictions?
	• Are workers organized in a union/labor organization? Describe (to the best of your knowledge) why you think workers chose or did not choose to be represented by unions.
	• If workers are represented by a union, is the union autonomous and independent?
	• What forms of worker representation, other than unions, exist in the company?
	• Are there collective labor agreements/agreements that cover workers and if so, how do you ensure compliance with these agreements/agreements?

