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CHILD LABOR PROCEDURE

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1. INTRODUCTION

In line with the principles and values expressed in the Social Responsibility Policy, the organization commits to not employing individuals who fall within the definitions of child labor and to refraining from exposing them to situations that, inside or outside the workplace, are hazardous, dangerous, or harmful to their health.

Nonetheless, to comprehensively protect children and young workers, this **Child Labor Remediation Procedure** has been developed. It establishes the methods that the company would adopt and the responsibilities involved in recovering underage workers who might be employed at its premises, to prevent them from seeking employment elsewhere due to socio-economic difficulties and lack of financial support for their families. The provisions of this document apply in the following cases:


- Presence of child labor;
- Presence of adolescent labor.

2. PURPOSE AND SCOPE

This procedure describes the methods by which the organization establishes, documents, maintains, and communicates to staff any remediation actions for children found to be in a working situation that qualifies as child or underage labor.

3. LEGAL REFERENCES

INTERNATIONAL REFERENCES	
ILO Convention 138	Minimum Age for Admission to Employment
ILO Recommendation 146	Minimum Age for Admission to Employment (Implementation tool of Convention 138)
ILO Convention 182	Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor
ILO Recommendation 190	Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor (Implementation tool of Convention 182)
Convention on the Rights of the Child	Adopted by the United Nations General Assembly on November 20, 1989
Universal Declaration of Human Rights (UN) - Article 25	Protection of childhood
NATIONAL REFERENCES (Italy)	
Italian Constitution - Article 37	Minimum Age Limit for Work & Protection of Minors in Employment
Workers' Statute - Article 10	Working Students
L. 19-01-1955 n.25 L. 8-8-1985 n.443 L. 24-06-1997 n. 196	Apprenticeship and Internship Contracts

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L. 17-10-1967 n. 977	Protection of Child and Adolescent Labor
L. 19-07-1994 n. 451	Training and Employment Contracts
Legislative Decree 04-08-1999 n.345 (as amended by Legislative Decree 18-08-2000 n.262)	Implementation of Directive 94/33/EC on the Protection of Young People at Work
Commitment Charter - Adopted by the Italian Government on April 16, 1998	Commitment to combating child labor by government, trade unions, and businesses

4. AGE VERIFICATION AT THE TIME OF HIRING

The organization's Administrative Management ensures that no child is mistakenly employed. During candidate selection, it verifies the authenticity of the candidate's personal information and, upon hiring, requires copies of identification documents, residence permits (if applicable), and documents mandated by the national collective labor agreement (CCNL).

5. REMEDIAL ACTIONS

Despite the commitment to not hiring individuals classified as children, if a child or young worker is found to be employed, the organization's Management, in collaboration with the SA8000 Representative, commits to implementing corrective actions aimed at ensuring the child's well-being and enabling them to complete their education.

Each child or young worker will be placed in a structured plan, which includes:

- Ensuring that children under 15 years fulfill their mandatory schooling.
- Providing vocational training to young workers aged 16-18 who have completed their mandatory education, aligned with their personal aptitudes.

Additionally, the company's Safety Officer will ensure that young workers are not exposed to dangerous, risky, or unhealthy conditions within or outside the workplace.

The intervention will focus not only on providing technical skills but also on helping the minor integrate into the labor market and broader society through educational support, recreational activities, vocational training, and apprenticeships.


The SA8000 Representative will draft a Remediation Plan, officially approved by Management, which will:

- Assess the severity of the child's situation;
- Identify the most suitable remediation actions.

Recognizing the complexity of such situations, the SA8000 Representative will always seek support from relevant organizations (e.g., Telefono Azzurro, Social Services Call Center, etc.) to ensure appropriate interactions with the minor and their family and to facilitate their reintegration into society.

To support the minor's family financially and ensure the effectiveness of the plan, the organization commits to:

- Covering school-related expenses (tuition fees, books, transportation);

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- Providing the minor with a safe and light job for a few hours a day or, alternatively, offering an income to mitigate the financial impact of their dismissal, ensuring that their total time spent on school, work, and commuting does not exceed 10 hours per day;
- When necessary, supporting a family member's employment within the organization or assisting them in securing external job opportunities to ease the financial burden on the minor.

The Management and SA8000 Representative are responsible for securing the necessary financial resources.

All cases of child labor identified within the organization must be documented by the SA8000 Representative, including details of the worker, the reasons behind their employment, and contributing factors to prevent recurrence.

6. SUPPLIER MONITORING

The SA8000 Representative must raise supplier awareness regarding SA 8000 compliance, ensuring they do not engage in child labor and that they formally commit to this principle through a signed declaration of compliance. Compliance with this requirement is essential for maintaining a long-term commercial relationship with the organization.

Additionally, the organization commits to verifying that its suppliers do not engage in child or underage labor in violation of applicable regulations. If a supplier is found to:

- Employ child labor;
- Employ young workers under conditions that do not comply with Italian law;

The SA8000 Representative will promptly report the issue to relevant authorities and organizations. They will also collaborate with the supplier and institutional bodies to implement corrective actions that do not negatively impact the underage worker. These actions must be recorded and continuously monitored by the SA8000 Representative.