

SAS 01 CHILD LABOUR

SOCIAL ACCOUNTABILITY ORGANISATIONAL PROCEDURE

1 edition					
Rev	Date of Drafting	Description	Function Manager	S.A.M.	In force from
0	01/09/2014	Issue	M. Tommesella	M. Tommesella	01/09/2014

SAS 01 OBJECTIVE AND AREA OF APPLICATION

The objective of this procedure is to define the procedures whereby MASTER ITALIA S.P.A. can guarantee that it will not employ or support child or juvenile labour.

In addition, the procedure specifies the activities that MASTER ITALIA S.P.A. must follow in order to implement the rehabilitation of children erroneously employed at its place of business and the remediation methods to be adopted in the event that its suppliers are found to make use of child labour.

In particular:

- it defines the measures with which MASTER ITALIA S.P.A. can promote the education of children addressed by ILO138 Convention (which sets the minimum age for admission to employment in developed countries at 13 years for light work, 15 years for regular work, 18 years for hazardous work, and the minimum age for admission to employment in developing countries at 12 years for light work, 14 years for regular work, 18 years for hazardous work) and the ILO 146 recommendation (which sets out the objective of gradually raising the minimum age for admission to employment to 16 years);
- it defines the measures with which MASTER ITALIA S.P.A. provides remedies for situations of child labour and adequate support to attend and remain in school for the period of compulsory schooling.
- in addition, it defines how MASTER ITALIA S.P.A. can manage young workers (apprentices, internees) at its place of business and verify their treatment by its suppliers.

SAS 02 REFERENCES

Standard SA 8000:08

Convention on human rights

Convention on the rights of the child

UNO Platform on the rights of women

Legislative decrees 395\1999 amended by legislative decree 262\2000

ILO138 Convention ratified by l.10-04-1981, no.157

Recommendation 146 on the minimum age for admission to employment

ILO 182 Convention on the worst forms of child labour; ratified by law 25-05-2000, no.148;

Legislative decree 04-08-1999 n.345 (supplemented by legislative decree no. 262/2000) Implementing directive 94/33/EEC on the protection of young people at work

Law 17-10-1967 no.977 Safeguarding children and young people

Law 10-04-1981 no.157 Minimum age for admission to employment

Law 19-07-1994 no. 451 Labour training contracts

Law 24-06-1997 no.196 Apprenticeship and internships (Ministerial Order no.142/1998).

Law 53/03 “Enabling act for the government to define general educational standards and essential service levels of schooling and professional training”

Legislative decree 59/04 “Definitions of the general standards on pre-school and elementary schooling pursuant to article 1 of law 28 March 2003, no. 53”

SAS 03 TERMS AND DEFINITIONS

- **Child:** Any person under 15 years of age, unless local laws lay down a higher age limit for work or mandatory schooling, in which case the stipulated higher age applies in that territory.
- **Child labour:** continuous or occasional gainful employment carried out in a non-family environment by a person under fifteen years of age, without prejudice to local laws positing higher ages as the minimum age for admission to employment or the completion of compulsory schooling.
- **Young worker - under-aged worker:** a person aged between fifteen and eighteen years who is gainfully employed.
- **Hiring:** the drawing up of an employment contract between a worker and an employer that regulates activities, working hours, and remuneration.
- **Remediation action for children:** Any form of support and action necessary to ensure the safety, health, education, and development of children involved in child labour, as defined above, and subsequently dismissed

SAS 04 ACCOUNTABILITY

The Management in cooperation with the Social Accountability Manager is responsible for ensuring that no children aged under 16 are hired.

Responsibility for the application of the verification procedures for child labour and any remediation programmes is part of the remit of the Social Accountability Manager

SAS 05.01 OVERVIEW

In line with the principles and values set forth in the SA8000 Policy, MASTER ITALIA S.P.A. pledges not to employ workers in its corporate structure whose age comes under the definitions of the child, as enshrined by Italian law, and especially workers aged under 16, as specified in Recommendation 146 on the minimum age for admission to employment.

In order to safeguard children in the most complete and comprehensive manner possible, the activities to be adopted by MASTER ITALIA S.P.A for the remediation of children who may be erroneously employed at our place of business or at suppliers are hereby laid down and

illustrated.

In the event that MASTER ITALIA S.P.A. is apprised of the presence of young workers at its suppliers, it undertakes to verify that the latter abstain from exposing young workers to the foregoing situations and respect the indications set out in the conventions on internship and the law in force.

SAS 05.02 INTERVIEWING AND HIRING

When a new employee is hired, it is the task of the Personnel Manager to ascertain that he or she is not a child by carefully examining the worker's particulars and requesting and scrupulously controlling an identity document (Identity card, driving licence, passport, birth certificate, etc.)

To facilitate the procurement of all significant data the Personnel Manager during the initial interview, must ask the questions set out in the "Initial interview" form.

Successively, the Personnel Manager in cooperation with the Labour Consultant will request the following documents when hiring a worker:

- Identity card;
- Tax identification number;
- Copy of the academic certification held;
- Copy of other qualifications held (fork-lift truck course, safety certificates ...);
- Family status.

These documents categorically exclude the hiring of a child.

In the light of the company's cooperation with professional training bodies for purposes of hosting internships at its structure and the possibility, pursuant to the pertinent sector of the National Collective Bargaining Agreement, of hiring apprentices, and also in the event that, for whatever reason, the company decides to hire a young worker, namely someone aged between 15 and 18, MASTER ITALIA S.P.A. undertakes not to expose any young worker to situations, either inside or outside the working environment, that are hazardous, risky, noxious to physical or mental health and, moreover, to observe all the indications contained in the internship conventions and the law in force. In particular, for initial training reference will be made to Proc. ADD procedures and the assessment of risks specified by the documents referred to under legislative decree 81/08. In addition, the company guarantees that the young person will not be assigned to purely manual tasks and will undergo the training necessary to enable the apprentice acquire the skills to become a qualified worker.

SAS 05.03 CONTROLS ON SUPPLIERS

If in the course of the supplier monitoring described in the preceding ACQ Procedure the company is apprised of a situation relating to product supply contracts or outsourcing suppliers in which recourse is made to the use of children, it is necessary to:

1. verify their age;
2. verify the need for work;
3. verify the access to school transport;
4. verify the type of work (heavy or light);
5. verify the total working hours and whether the work is part-time or full time;
6. verify the health risks.

In addition, if the company discovers that its suppliers employ young workers, it must verify if they are exposed to hazardous or noxious work and that the indications contained in apprenticeship conventions and the law in force are observed. (see subsection 5.1 General Details and subsection 2 References).

The Social Accountability Manager is responsible for such activities. In the event that he discovers an anomalous situation (no respect for safety conditions, no respect for reference laws, ...) involving young workers, he shall be required to take appropriate actions with respect to the supplier and reach agreement with him on special actions to guarantee safe working conditions and the observance of the law in force for such young workers.

SAS 05.04 REMEDIATION PLANS

Having ascertained the existence or otherwise of child labour either at MASTER ITALIA S.P.A., or its suppliers, it is necessary to provide the maximum protection against health and safety risks, and where possible remove the child from the workplace so that he can be hired when the minimum requirements for his employment have been met and, in the meantime, propose alternative solutions.

Each child will be admitted to a specific itinerary that makes provision for activities that are most suitable for his training/instruction: first and foremost, provision will be made to guarantee the obligation of compulsory schooling.

The Social Accountability Manager, in association with the person in charge will draw up a remediation plan for the child to determine:

- the critical issues of the child's situation;
- the remedial actions to be taken, by identifying the most suitable for the specific case in question.

Being aware of the difficulties in managing such a situation, MASTER ITALIA S.P.A., will avail itself of the assistance of associations operating in the sector (Telefono Azzurro, local NGOs, etc.), able to provide indications on the most suitable ways to handle relations with the child and his family as well as to identify the most suitable channels for the child's reintegration into society.

To ensure the factual implementation of such a plan, and help the child's family meet the expenses incurred in the course of its application, MASTER ITALIA S.P.A., undertakes to:

- ensure the child's schooling by paying school fees, textbooks, and transport to school;
- provide the dismissed child with alternative income in order to lessen the financial impact on the family, or alternatively, to provide the child with light and safe work for a few hours a day, while assuring that the young worker's school, work, and transportation time exceed a combined total of 10 hours per day.

Once remediation actions have been planned and set in motion, the Social Accountability Manager will monitor them through discussions with the school and social authorities and follow appropriately registered and precise verification plans.

SAS 05.05 COMMUNICATIONS AND CORPORATE COMMITMENT

The refusal of child labour will be communicated at all corporate levels, as part of the internal and external communication of company policy to all stakeholders.

During an internal audit or even one conducted at suppliers, the presence of children or young workers must always be verified.