

Child labour procedure and remediation plan

Management Systems

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Summary	This procedure defines the operational procedures adopted by aizoOn to remedy child labour and to protect young workers.

Changes

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1 PURPOSE OF THE DOCUMENT

This procedure defines the operational procedures adopted by aizoOn to remedy child labour and to protect young workers.

In particular, the operational methods adopted aim to:

- Ensure the safety, health, education and development of children for whom a situation has been found to fall within the definition of child labour and from which they have been removed, ensuring continuous monitoring to support the effectiveness of the actions implemented.
- Ensure adequate protection of young workers who may be employed, by promoting the necessary actions to prevent potential hazardous conditions for their health and safety and to foster a suitable path of professional growth and psycho-physical development.

2 SCOPE OF APPLICATION

The procedure applies to the entire aizoOn corporate organisation.

In accordance with the SA8000 standard [ref. IV Social Accountability Requirements - 9.10 Management of Suppliers and Contractors], aizoOn requires and monitors its suppliers to undertake not to use or support the use of child labour and to verify that this requirement is also respected at subcontractors.

3 DEFINITIONS

In accordance with the SA8000 standard the following definitions are accepted.

TERM/ACRONYM	DEFINITION
Child	Any person under 15 years of age, unless the minimum age of work or mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality.
Young worker	Any worker under the age of 18 but over the age of a child, as defined above.
Corrective action	An action to eliminate the root cause(s) of an identified non-conformity. Corrective action is taken to prevent recurrence of the non-conformity.

Non-conformity	Failure to meet a requirement.
Child labour	Any work performed by a child younger than the age(s) specified in the above definition of a child, except as provided for by ILO recommendation 146 (Minimum age).
Remediation of child labourers	All support and actions necessary to ensure the safety, health, education and development of children who have been subjected to child labour, as defined above, and whose work has been terminated.
Supplier	Any entity or individual in the supply chain that directly supplies the organisation with goods or services integrated into, or used in or for, the production of the organisation's goods and services.
Sub-supplier	Any entity or individual in the supply chain that supplies the supplier with goods and/or services integrated into, or used in or for, the production of goods or services of the organisation or one of its suppliers.
SPT	Social Performance Team: responsible for implementing all elements of SA8000.
ILO	International Labour Organisation.

4 ACCOUNTABILITY

The corporate entity responsible for the correct application of the procedure is the Social Performance Team.

5 OPERATING MODES

aizoOn does not employ child labour.

aizoOn adopts specific procedures for the selection and recruitment of its employees. These procedures define the necessary documentation to be produced, by the worker, for the purposes of recruitment; the evaluation of this documentation allows the prevention of child labour situations, in accordance with the SA8000 Standard.

5.1 REMEDIATION OF CHILD LABOURERS

Anyone who directly detects an instance of child labour or becomes aware of possible child labour within aizoOn or at suppliers/subcontractors must immediately report it to the Social Performance Team. Reportings can be made directly to aizoOn in the following ways:

- Send an e-mail to sa8000reporting@aizoongroup.com.
- Using the anonymous reporting platform whose link is available on the corporate website <https://aizoongroup.com>.

The Social Performance Team, once it has received the report, starts the process of ascertaining the facts and/or situations with the collaboration of the Human Resources Management and the company figures responsible for overseeing the company processes and/or the service/structure concerned. If a child labour situation or a situation that falls within the terms of the definition of "child labour" of the SA8000 standard is found, the Social Performance Team, with the collaboration of the Human Resources Management, activates the necessary actions for the immediate removal of the child from the situation.

Once the child labour situation has been removed, the Social Performance Team, in collaboration with the Human Resources Department, is responsible for initiating the necessary remediation actions to ensure the safety, health, education and development of the child, as defined in SA8000, namely:

- Immediately notify the competent bodies.
- Define, in cooperation with the competent legal bodies and the parents, a support plan for the child that plans the following:
 - Employing a parent or relative in place of the child and/or young worker (where possible).
 - Providing financial support to working children and/or young workers in order to enable them to attend and remain in school until the expected age.
 - Organise activities in such a way that the sum of working hours, hours spent at the school and hours to and from work and to and from the school do not exceed 10 hours/day.
 - Check and, if necessary, promote a transport system that allows the worker to move easily and safely between home, workplace and educational institution.
 - Support the worker (and/or his or her family) in obtaining the tools (e.g. qualifications) needed for the education process and organise work activities as defined below.

The Social Performance Team, at the same time as the actions described above, carries out a careful assessment (with the collaboration and involvement of the corporate figures in charge of overseeing the processes concerned) of the causes that generated the occurrence of the identified child labour situation. The Social Performance Team initiates a Corrective Action (CA) with the aim of planning and implementing the necessary actions to overcome the non-compliance and prevent the occurrence of further criticalities.

The Social Performance Team keeps a record of the event, the actions taken to overcome the critical conditions encountered, the monitoring actions identified, the open CAs, the outcomes of the interventions and the closure of the critical situation.

In order to ensure adequate and comprehensive communication to the entire organisation about reportings received on situations that fall within the definition of child labour and possible use of child labour within aizoOn or at suppliers/subcontractors, the data relating to the reportings are documented in the Social Report, which is a document reviewing the effectiveness of the application of the Standard. The data relating to reportings are also analysed by SPT during the periodic meetings aimed at reviewing the effectiveness of the procedures adopted in order to identify any improvement actions and in the Management Review.

5.2 ACTIONS TO PROTECT AND SUPPORT YOUNG WORKERS

In the event that aizoOn employs young workers within its organisation, it undertakes to:

- Put in place all necessary and appropriate actions to ensure protective conditions for physical and mental health and their development, including through the prevention of hazardous or potentially hazardous situations, in accordance with the SA8000 Standard.
- Planning and implementing a career path capable of supporting the development of the young worker's competences and skills with a view to promotion and enhancement.

If the young workers are subject to compulsory schooling, aizoOn guarantees within its organisation working hours that allow and facilitate the fulfilment of the school curriculum, in compliance with the SA8000 Standard [ref. IV Social Accountability Requirements - 1.3 Child labour], which states that:

- Young workers may only work outside school hours.
- Under no circumstances may young workers work for more than 8 hours per day.
- Under no circumstances may the total time spent at school, work and commuting by the young worker exceed 10 hours per day.

5.3 COMMUNICATION MODES

The SA8000 Standard specifies that "The organisation shall establish, document, maintain and effectively communicate to staff and other interested parties, written policies and procedures to remedy child labour situations [...]" [ref. IV Social Accountability Requirements - 1.2 Child labour].

aizoOn in order to guarantee effective communication of the contents of this procedure and its widest dissemination ensures:

- The delivery to all personnel at the stage of hiring.

6 REFERENCES

- Social Accountability 8000:2014.
- Law 977/67 Labour protection of children and adolescents.
- Law 157/81 Minimum age of access to employment.
- Law 176/91 Art. 28: Right to education; Art.32 Protection from economic exploitation and harmful activities.
- Law 148/2000 Prohibition and immediate action for the elimination of the worst forms of child labour.
- Legislative Decree 345/99 Protection of young people at work.
- Legislative Decree 262/2000 Supplementary and corrective provisions to Legislative Decree 345/99 on the protection of young people at work.
- Legislative Decree 77/2005 Definition of the general rules on school-work alternation, pursuant to art. 4 Law 53/2003.
- Law 296/2007 Compulsory education for at least 10 years (6-10 years) with an increase from 15 to 16 years of the age for access to employment.

International normative instruments (ref. Sect. II SA8000:2014 - Normative elements).

- UN Convention on the Rights of the Child.
- ILO Convention 138 (Minimum Age).
- ILO Convention 182 (Worst Forms of Child Labour).
- ILO Convention 81 (Working Conditions).
- ILO Recommendation 190 (Work that impairs the health, safety, morals of the child).

7 ARCHIVING

The Social Accountability Management System Manager (SAMSM) archives the procedure for a period of 3 years.