



**OPERATIONAL PROCEDURES AGAINST
CHILD LABOUR**

P05

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CONTENTS

1. PURPOSE.....2

2. REFERENCES.....2

3. DISTRIBUTION2

4. OPERATIONAL METHODS3

4. 1 Policy for the safeguarding of children/young workers3

4.2 Age verification at the time of employment.....3

4.3 Remediation actions in case of child labour.....3

4.4 Inclusion of young workers.....4

4.5 Supplier monitoring4

| | | | | | |
|-------------|-------------|---------------|----------------------------------|-------------------------------------|-------------------------------------|
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1. PURPOSE

In line with the principles and values expressed in the Social Responsibility Policy, the G&P NET Group undertakes not to employ persons under the age of 16 and, for young workers (between the ages of 16 and 18), the Group will abide by all of the current provisions in national law in order to guarantee that they are not exposed to situations that are risky, hazardous or harmful to health, either inside or outside the workplace.

In spite of this, in order to protect children and young workers as thoroughly and as far as possible, this *Remediation Procedure* has been drawn up to set out the methods that would be used by the company and officers in the remediation activities for child labourers in the event that this situation is identified with any of its suppliers.

2. REFERENCES

SA 8000: 2014 par. 1

| International and European References | |
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| ILO Convention 138 | Minimum Age for Admission to Employment |
| ILO Recommendation 146 | Minimum Age for Admission to Employment - Application tool for Convention 138 |
| ILO Convention 182 | Prohibition and immediate action for the removal of worst forms of child labour |
| ILO Recommendation 190 | Prohibition and immediate action for the removal of worst forms of child labour - Application tool for ILO Convention 182 |
| Convention on the Rights of the Child | Convention adopted by the General Assembly of the United Nations on 20 November 1989 on the rights of the child |
| Universal Declaration of Human Rights - Art. 25 | Child protection |
| European Community with Directive 94/33 | Basic principles on the protection of young people at work. |
| National references | |
| Italian Constitution – art. 37 | Minimum age limit for employment - Protection of minors at work |
| Workers' statute - art. 10 | Working students |
| L.19-01-1955 no. 25 L. 8-8-1985 no. 443 L. 24-06-1997 no. 196 | Apprenticeships and trainee contracts |
| L. 17-10-1967 no. 977 | Protection of children and adolescents |
| Lgs. Decree 04-08-1999 no.345 (as amended and integrated by Lgs. Decree no. 262 18-08-2000) | Implementation of Directive 94/33/EC regarding protection of young people in the workplace |
| Charter of commitments – implemented by the government on 16 April 1998 | Charter against child labour involving government, unions and entrepreneurs against this problem. |
| L.D. 25 June 2008 (Art. 23) | Repeal of obligatory communications on apprenticeship |
| Lgs. Decree 81/2008 (Consolidated law on health and safety in the workplace) as amended and integrated by corrective action 106/09 | Health and safety in the workplace |
| Budget law 2020 | Incentive for long-term employment for young people ("Young people under 35") |

3. DISTRIBUTION

- HR Manager
- SA8000 Management Representative

4. OPERATIONAL METHODS

4.1 Policy for the safeguarding of children/young workers

the G&P NET Group has developed the following policy in order to promote the principles of child education, as defined in the ILO Recommendation 146:

The G&P NET Group undertakes to comply with and to inform interested parties of, both in house and externally, its commitment not to use child labour, either regularly or occasionally, and to be a spokesperson for the safeguarding of young people in the workplace.

Specifically, the G&P NET Group undertakes to comply with the following:

- collective work contracts and all regulations on the employment of minors and young people in the company (internship agreements, apprenticeships, entry-level contracts, programmes alternating school-work, etc.) in conformity with Lgs. Decree no. 345 of 1999 as amended;
- the regulations that safeguard the needs of student workers;
- forms of collaboration with schools and educational institutes to foster the entry of young people into employment;
- forms of collaboration with NGOs and local entities to support child protection policies.

4.2 Age verification at the time of employment

In order to guarantee that no child is employed by error in any of the companies belonging to the G&P NET Group, at the time of recruitment, the HR Division will check the truthfulness of the candidate's personal details, as well as requiring a copy of an identity document at the time of employment.

4.3 Remediation actions in case of child labour

In spite of the best efforts not to hire workers who fall within the definition of children, in the event that any child labour is found to be used by any of its suppliers, the individual management of the G&P NET Group undertakes to put in place a series of remediation actions to safeguard the child and his/her family. The HR Division will, in a timely manner, contact the institutional bodies and associations that operate in the supplier's sector and country in order to report the non-compliance. It will also work with the institutions as well as directly defining, together with the supplier, all remediation actions aimed at not adversely affecting the child's situation.

The Recovery Plan must state:

- the critical nature of the child's situation;
- the recovery actions to be undertaken, identifying the most suitable for the specific situation in question.

Aware of the difficulties in managing the situation, the HR Division will make use of the support of associations that are active in the field, both at national and international level (Telefono Azzurro, local NGOs, etc.) that can provide information about the most suitable methods to follow in relations with the child and his/her family, as well as to identify the most suitable channels to protect the child.

The remedial programme identified must consider the following, to:

- guarantee a form of support for the child and his/her family in place of the work, providing an alternative income to reduce the financial impact on the family;
- guarantee that the minor can complete his/her compulsory education as provided for in the current laws, while promoting an orientation towards employment, also through payment of school taxes, books, and transport;
- seek to integrate one of the child's family members into the company workforce or alternatively, to support them in finding employment so as to ensure financial support for the family and to remove the burden of responsibility from the child.

It is the task of management, in conjunction with institutional entities, to identify the methods and to source the financial resources needed.

4.4 Inclusion of young workers

In the event that a minor is to be integrated into the workforce of one of the G&P NET Group companies, the HR Division will check beforehand to ensure that the new collaborator has finished his/her obligatory schooling. In the event this is true, the company in question undertakes to offer the young person professional training in line with his/her personal aptitudes. The young person will be included in a professional training programme (as provided for in current laws) and compliance with current safety regulations is guaranteed, ensuring that the young person is not exposed to situations that are dangerous, risky or harmful to health, either inside or outside the workplace.

In particular, in case of young workers, G&P NET Group undertakes:

- not to expose young workers to hazardous tasks (e.g. exposure to physical, biological, or chemical agents, or specific processes);
- never to allow young workers to work at night;
- to comply with current regulations concerning the weekly rest period.

4.5 Supplier monitoring

The Operation Department will, through in-house officers appointed to assess and monitor supply, ensure continued awareness raising among the latter for the principles set out in the SA 8000 regulation so that they make no use of child labour and commit, in writing, to comply with this principle by signing the Code of Corporate Social Responsibility. Compliance with this requirement is an essential condition for a lasting business relationship with the companies in the Group.

The G&P NET Group has put in place a regular assessment and monitoring system for suppliers, consisting of an in-house team of qualified auditors who constantly check suppliers and subcontractors to ensure compliance with the prohibition of child labour.

In the event that critical situations are found regarding this requirement during the monitoring process, the Operations Manager will inform the HR Division to implement an immediate remediation action.