

1 PURPOSE AND APPLICATION FIELD

The purpose of this procedure is to define the ways in which **T.i.S. Service** guarantees not to use and encourage the child labour.

It also specifies the activities carried out by **T.i.S. Service** to implement the recovery of child wrongly used in its own company or inside their suppliers company.

In particular:

- Defines the ways in which **T.i.S. Service** promotes the children education inside the ILO138 Convention (allows work as a minimum age in developed countries: 13 years for light work, 15 years for regular jobs and 18 years for risky jobs; minimum age in developing countries: 12 years for light work, 14 years for regular jobs and 18 years for risky jobs) and ILO 146 (aims to progressively increase the minimum age at work at age 16);
- Defines the ways in which **T.i.S. Service** remedies child labor situations and provides support for school attendance and permanence up to compulsory schooling;
- Moreover, it defines how **T.i.S. Service** manages young workers (apprentices, interns) at its premises and checks their treatment with its suppliers.

2 REFERENCES

- SA 8000 STANDARD: 2014
- Human Rights Convention
- Children Rights Convention
- UN platform on women's rights
- D.l.gs 395\1999 modified into d.l.gs 262\2000
- ILO138 Convention ratified with l.10-04-1981, n.157
- Recommendation 146 concerning the minimum age to access work
- ILO 182 Convention on the worst forms of child labor ratified with l..25-05-2000, n.148;
- D.Lgs. 04-08-1999 n.345 (int. D.Lgs.n.262/2000) directive implementation 94/33/CEE for the protection of young people at work
- L. 17-10-1967 n.977 Protection of children and adolescents
- L.10-04-1981 n.157 Minimum age for employment
- L.19-07-1994 n. 451 Work training contracts
- L. 24-06-1997 n.196 Apprenticeships and training internships (D.M. n.142/1998).
- Law 53/03 "Delegation to the Government for the definition of the general rules on education and the essential levels of services of education and training"
- "D.Lgs 59/04 "Definition of the general rules relating to kindergarten and the first cycle of education, in accordance to article 1 law 28 march 2003, n. 53".
- D.Lgs 15/04/2005 n.77 "Definition of general rules concerning school-work alternation"
- Ministerial Decree November 3, 2017, n. 195 "Charter of the rights and duties of students alternating between school and work".

3 TERMS AND DEFINITIONS

- **Child:** any person under 15 years of age, unless the local laws provide a higher minimum age for work and compulsory schooling, in this case the highest age applies in that location.
- **Child Labour:** continuous or occasional work, carried out in a non-family environment by a person under the age of 15, unless local laws regarding the minimum age to work or completion of the highest grade of school education, for which a remuneration is paid.
- **Young worker - underage worker:** person aged between 15 and 18 who carries out work activities and receives a remuneration.
- **Recruitment:** drafting a contract between worker and employer that regulates the work activity, timing and remuneration.
- **Remedial action for children:** any form of support and actions necessary to guarantee the safety, health, education and development of children who have undergone child labor, as defined above, and have ended this work.

4 RESPONSIBILITY

Ensure that young people, under the age of 16, are not hired is the HR (responsible human resources) in collaboration with RSGII (Responsible for integrated management systems).

RSGII is responsible for the application of child labor verification procedures and any recovery programs.

5 OPERATING MODES

In line with the principles and values expressed in the SA 8000 Policy, **T.i.S. Service** undertakes not to employ child labour, as established by Italian law, and in particular under 16 years of age, as specified by Recommendation 146 concerning the minimum age to access work.

In order to protect completely the children, in the following procedure are established and illustrated the activities that would be adopted by **T.i.S. Service** for the recovery of children who, by mistake, may be used at their company or at suppliers company.

In the event that **T.i.S. Service** becomes aware that with its suppliers are working young employees, it will verify that they are refraining from exposing young workers to the situations mentioned above and respecting the instructions contained in the internship agreements and in the current legislation.

6 EMPLOYMENT INTERVIEWS AND RECRUITMENTS

It is Personnel manager task, when hiring a new employee, to make sure that it's not a child, through a careful analysis of the personal data, asking and checking carefully an identity document (identity card, driving license, passport, birth certificate, etc.).

When it's time time to hire the Personnel Manager, in collaboration with the Labor Consultant, he/she will request the following documents:

- Identity Card;
- Fiscal Code;
- Other qualification copy (Forklift Driver Course, Safety Certificates ...);

These documents exclude the child recruitment.

The **T.i.S. Service**, as collaborate with employment agencies and professional training institutions to host internships in its structure and the possibility, according to the CCNL, to hire apprentices, and in case, for some reason, decide to hire a young worker, aged between 15 and 18, undertakes to refrain from exposing such young worker to situations that are, outside or inside the workplace, risky, dangerous and harmful to physical or mental health, respecting the indications contained in the internship agreements and in the current legislation. In particular, for initial training, reference is made to the training procedure and to the assessment of risks to the documentation relating to D.lgs 81/08. It also ensures that the young person will not be used in activities of pure labour but it will be trained to achieve the ability to become a skilled worker.

7 SUPPLIERS CONTROL

If you become aware, by monitoring the supplier of a reality linked by products suppliers contract or outsourcing suppliers, that there is the presence of children, you need:

1. verify the age;
2. verify the need of work;
3. verify the transport access to go to school;
4. verify the work type (Heavy or light)
5. verify the total work hours and if it's a part-time or full time job;
6. verify if there are healthy risks.

Furthermore, if the suppliers use a young workers, it shall be verified whether they are exposed to dangerous or harmful work and that the instructions contained in the internship agreements and in the regulations in force are respected.

The responsibility of these activities is of the RSGII or of the persons appointed by him for the verification at the suppliers that, in the case there is an anomalous management (not respecting safety conditions, non-compliance with reference legislation...) of young workers, has the task of take actions against the supplier and agreeing with the same special actions, to ensure these young employees will work in safe conditions and they will respect the current legislation.

8 RECOVERY PLANS

Established the existence or absence of child labour, both in **T.i.S. Service** and among suppliers, maximum protection must be given to health and safety risks, whenever possible to remove the child from work and then re-employ him/her when the minimum requirements are met, and find alternative solutions in the meantime.

Each child will be included in a specific path that provides the most suitable activities for his/her training: the priority is to guarantee that the school obligation is absolved.

Responsible for ethical management, in collaboration with the Manager in charge, draws up a recovery plan for the child, determining:

- How critical the child situation is;
- The recovery actions to be implemented, identifying the most suitable ones for the specific situation.

Aware of the difficulty in managing the situation, **T.i.S. Service** will use the support of active associations in this sector (Telefono Azzurro, local NGOs, etc.), which can provide indications on the most suitable ways to entertain relations with the child and his family, as well as for the identification of the most suitable channels to reintegrate him/her into the child's society.

In order to ensure the real progress of this plan, and to support the child's family expenses for its development, **T.i.S. Service** undertakes to:

- Ensure child education by paying tuition fees, books, school transportation;
- Provide the child with an alternative income to reduce the financial impact on the family, or alternatively provide the child with a light and safe work for a few hours a day, ensuring that the total hours dedicated to school, work and travel from/to these places does not exceed 10 hours in total.

Once the remedial action has been planned and developed, these are monitored and recorded by RSGI with interviews with the educational and social authorities.

9 COMMUNICATION AND BUSINESS COMMITMENT

The refusal of child labour is communicated at all levels, in the Company Policy, also outside, to all its stakeholders.

During the audits, both internal and with the suppliers, it is always necessary to check the presence of children or young workers.