

**TABLE OF CONTENTS**

1.	<u>PURPOSE</u> .....	2
2.	<u>FIELD OF APPLICATION</u> .....	2
3.	<u>REFERENCE STANDARDS</u> .....	2
4.	<u>RESPONSIBILITY</u> .....	2
5.	<u>OPERATING PROCEDURES</u> .....	3
5.1	Preventive Actions .....	3
5.2	Child labour reports.....	3
5.3	Actions of the remedy plan .....	4

### 1. PURPOSE

This procedure defines the responsibilities and activities established by the Aquafil Group (hereinafter AQUAFIL) for managing possible child labour situation understood as “*any work carried out by a child<sup>1</sup> except as provided for by the ILO Recommendation 146*”.

The procedure in question establishes in particular the operating procedures followed by the Organisation for managing child labour and the methods to be activated in the event that the use of child labour is ascertained in the context of the activities over which AQUAFIL has direct control or over which it can exert its influence.

### 2. FIELD OF APPLICATION

This procedure applies to all AQUAFIL Group companies which have implemented a social responsibility system and to the activities carried out directly by the Organisation as well as to those suppliers over which AQUAFIL can exercise influence or control (e.g. suppliers who provide on-site services, suppliers in outsourcing etc.).

### 3. REFERENCE STANDARDS

- Social Accountability SA8000:2014
- ILO Convention 138 and Recommendation 146 (Minimum age)
- Annex SA8000:2014 Performance Indicators

### 4. RESPONSIBILITY

PROCESS STAGE	ACTIVITIES	PERSON RESPONSIBLE	OPERATIONS MANAGER
PREVENTIVE ACTIONS	It defines the actions to be taken to prevent the occurrence of child labour	TOP MANAGEMENT	Top management representative in the SA8000 area
CHILD LABOUR REPORT	Management of reports concerning the presence of child labour at a direct or indirect level	HEAD OF SA8000 Committee <sup>2</sup> (Social Performance Team)	DESIGNATED FUNCTION
REMEDY PLAN	Activation of the remedy plan in the event of a significant use of child labour in activities under the direct control of Aquafil	Top management representative in the SA8000 area	SA8000 Committee

<sup>1</sup> Any person under 15 years of age (with national exceptions e.g. 16 years for the Italian territorial context).

<sup>2</sup> In this procedure, the SA8000 Committee should be understood as the Social Performance Team as required by SA8000:2014

## **5. OPERATING PROCEDURES**

### **5.1 Preventive Actions**

As part of its Organisational policy, and within the framework of its Organisation, Management and Control Model (OMM), the AQUAFIL Group has clearly defined its commitment not to resort to child labour and to promote all actions aimed at developing a culture which protects young workers.

The main actions through which AQUAFIL intends to pursue this commitment are:

- ✓ Employment of adult staff (18 years), a requirement verified by checking documents during the hiring phase;
- ✓ compliance with the Collective Labour Agreements and with all legislation relating to the employment of young people in the Organisation (internships and training internships);
- ✓ compliance with the laws concerning the protection of student workers;
- ✓ dissemination to interested parties concerning issues relating to Child Labour.

Should any student be hosted by AQUAFIL in the context of training courses (e.g. internships), the latter will draw up agreements with training institutions and carry out the training courses whilst avoiding their exposure to risky or harmful situations.

At present there is no provision for the employment of young workers (16-18 years) in the company staff, this procedure details the aspects to be considered (e.g. Young workers who work for suppliers):

- ✓ young workers must not work during school hours;
- ✓ under no circumstances can the total time spent between school, work and travel exceed 10 hours a day;
- ✓ under no circumstances can young workers work more than 8 hours a day;
- ✓ the employment of young workers at night is not allowed;
- ✓ young workers are not exposed to situations which are risky or harmful to their physical and mental health and to their growth, both inside and outside the workplace.

At the internal organisational level, a personnel recruitment, selection and evaluation protocol, associated with the OMM, is in place. This defines:

- ✓ the attribution of responsibility within the process itself;
- ✓ the related principles of conduct during the context of the personnel recruitment process;
- ✓ the operating procedures for managing the process in accordance with current laws and the company's ethical standards.

As regards the potential occurrence of child labour cases within its supply chain, AQUAFIL adopts the following preventive measures within its Management System:

- ✓ qualification and control of its suppliers;
- ✓ SA8000 risk assessment, and for suppliers exposed to child labour risk, definition of management measures (e.g. underwriting a commitment to comply with the requirements of the SA8000 standard and with the applicable territorial legislation, possible dedicated control/monitoring procedures);
- ✓ monitoring and control of suppliers (e.g. verification of personnel employed for on-site work, SA8000 audits at suppliers etc.).

### **5.2 Child labour reports**

Reports of any employment of child labour within the activities under AQUAFIL's direct control or that the organisation can influence, may derive from:

- ✓ operational audits;
- ✓ SA8000 reports;
- ✓ Direct communications to AQUAFIL personnel.

Any anomaly in the management of child labour must be promptly reported to the SA8000 Committee.

Should a case of child labour be confirmed, following its verification the Aquafil Management System provides for the immediate opening of a Non-Compliance of the SA8000 Management System.

Following the analysis of the Report and the Opening of the Non-Compliance, the need to activate a dedicated remedy plan to protect the child is assessed.

### **5.3 Actions of the remedy plan**

Should child labour employment be encountered, including should this occur within the supply chain under the direct control of the organisation, the SA8000 Committee must notify the top management Representative for the SA8000 system.

With the support of the SA8000 Committee and of any other internal or external functions, to be involved according to the context of the report, the specific circumstances and the critical issues affecting the minor, the TMR (RAD) undertakes to define with its supplier (should the Non-Conformity relate to the supply chain under direct control), one or more of the following remedial actions:

- to contact the relevant institutional bodies and sector associations on the territory (e.g. educational services, social services, labour inspectorate, etc.);
- to collaborate with the institutions to define a remedial action plan appropriate to the specific case;
- to ensure, if necessary, an alternative form of support for the child's family;
- to ensure that the child completes his/her educational path by contributing to useful expenses (e.g. payment of school fees, purchase of books, transport to school);
- in collaboration with the interested parties, to find the resources for implementing the plan;
- to monitor the child's situation over time;

The activation of a remedy plan is managed as part of the Corrective Actions and will result in the need to assess the updating and adequacy of the SA8000 Risk Analysis.