

MANAGEMENT OF SA8000 REPORTS

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Sommario

1. GOAL AND SCOPE	3
2. FUNCTION INVOLVED	3
3. PROCEDURE APPLICATION.....	3
3.1. SHARING SA8000 REPORTING PROCEDURES WITH INTERESTED PARTIES	3
3.2. TOOLS FOR SUBMITTING SA8000 REPORTS	3
3.3. REPORT MANAGEMENT	5
3.4. SHARING RESULTS	7
3.5. REFERENCE DOCUMENTED INFORMATION AND RECORDS	7

1. GOAL AND SCOPE

This procedure defines the processes, contents and responsibilities established by the AQUAFILUK for managing reports (or complaints) submitted by interested parties (workers, suppliers, customers, associations, etc.) on the subject of social responsibility, workers' rights and in general, compliance with the requirements of the SA8000 Standard.

The procedure defines the methods with which AQUAFIL:

- investigates, manages and transmits the results of the reports and complaints regarding NCs with the Standard or with the related policies and procedures adopted;
- makes available the results concerning the Management of SA8000 Complaints/Reports to the personnel and, upon request, to the interested parties.

The procedure is applied to AQUAFILUK plant for managing reports from the personnel, from other interested parties and from subjects belonging to the production chain which concern compliance with SA8000 requirements and with the ethical and social principles applied by the Organisation

2. FUNCTION INVOLVED

PROCESS STAGE	ACTIVITIES	PERSON RESPONSIBLE	OPERATIONS MANAGER
DISSEMINATION OF SA 8000 REPORTING TOOLS	Information and provision of procedures for issuing a SA8000 report	Top management representative in the SA8000 area	SA8000 Committee ¹
SUBMITTING SA8000 REPORT	Submitting reports (or complaints) regarding SA8000 aspects	ALL INTERESTED PARTIES	ALL INTERESTED PARTIES
MANAGEMENT OF SA8000 REPORTS	Managing reports concerning SA8000	SA8000 Committee Coordinator	SA8000 Committee
TRANSMISSION OF RESULTS	Notification to interested parties of the outcome of reports and complaints where requested	Top management representative in the SA8000 area	SA8000 Committee Coordinator

3. PROCEDURE APPLICATION

3.1. SHARING SA8000 REPORTING PROCEDURES WITH INTERESTED PARTIES

Sharing the procedures of issuing SA8000 reports to the AQUAFIL interested parties takes place for example through:

- Informing/training internal personnel in this procedure;
- dissemination of this specific procedure (e-mail, intranet, training, document archives);
- information through company bulletin boards;
- publication of the procedures on the company website.

3.2. TOOLS FOR SUBMITTING SA8000 REPORTS

Reporting to the SA 8000 AQUAFIL Committee

The AQUAFILUK interested parties involved in social issues and in the application of the SA8000 Standards can issue reports or make suggestions to organization in relation to:

¹ In this procedure, the SA8000 Committee should be understood as the Social Performance Team as required by SA8000:2014

- compliance with the requirements of the SA 8000 standard;
- complaints regarding the workplace;
- improvement of the organisation's social performance;
- discrepancies with the procedures or policies adopted (e.g. discrimination in the workplace, non-compliance with working hours, limitation of trade union freedom, etc.)

The reports in question can be sent to AQUAFIL's SA8000 Committee through the specific TOOLS made available to the Organisation, accessible on the Aquafil website: <https://www.aquafil.com>

SPECIFIC LINKS TO THE SA8000 REPORTING TOOL		
AquafilUK	fpls.in/sa8000_aquafiluk	EN

The SA8000 REPORTING Tool establishes a series of mandatory and voluntary information useful for contextualising the report:

SUBMITTING AN SA8000 REPORT	
MANDATORY INFORMATION	VOLUNTARY INFORMATION
Company to which the report refers	Data of the whistle-blower (Name, Company to which he/she belongs) ²
Area of the company to which the report refers	Documents attached useful for the report
Country where the violation occurred	Desire expressed concerning the report's update
Date/Time Period and Place where the events occurred	
Indication of the main parties or subjects involved	
Description of the facts	

The reports are collected anonymously, confidentially and impartially by the SA8000 Committee, the Technical Group established by AQUAFILUK (which also includes the SA8000 Workers' Representatives) to ensure compliance with the SA8000 requirements; the presence of workers' representatives in fact aims to ensure a clear management of the reports and the non-implementation of retaliatory measures

Workers can also report through their S8000 workers' representatives.

AQUAFILUK assures that no form of discrimination or retaliation will be carried out following reports or complaints regarding aspects of Social Responsibility

External reports

Upon obtaining the SA8000 system certification, with the aim of establishing a system of credibility and protection of the interested parties, Aquafiluk provide the contact details which specify how the reports concerning Social Responsibility may also be sent to the Certification Body (body in charge of verifying the compliance and adequacy of the Management System for Social Responsibility with the requirements of the SA8000 standard) or to the accreditation body (body responsible for coordinating the activities of accredited certification bodies for SA8000 certification activities).

² The personal details of the whistle-blower are specifically requested as voluntary information in order to provide the possibility of sending a communication even in anonymous form.

3.3. REPORT MANAGEMENT

The receipt of the reports is monitored by the designated functions of the SA8000 Committee of the Aquafiluk.

Upon receipt of the report, the Coordinator of the SA8000 Committee undertakes to carry out the following actions

- To record the Reports;
- To assess the need to investigate the report and make any requests for integration (where possible);
- To analyse/verify the validity and truthfulness of the report;
- To involve, if deemed appropriate and/or applicable, any other members of the SA 8000 Committee in the analysis of the report.

Based on what emerged from the analysis of the Report, the SA8000 Committee may decide to take the following actions (Figure 1):

- Should the report not be backed up by elements such as to be able to determine its truthfulness and validity, the Coordinator of the SA8000 Committee responds to the interested party, motivating the conclusion (if the report is received non-anonymously) and informs the other members of the SA8000 committee and updates the SA8000 Report Register.
- Should the report be true and well-founded, a Non-Compliance of the SA8000 Management System is opened, identifying the appropriate Corrective Actions. The coordinator informs the SA8000 Committee and updates his/her SA8000 report register until the related actions are closed.
- If the report concerns a proposal/suggestion for improvement of the SA8000 system, this is evaluated during the periodic meetings of the SA8000 Committee to possibly integrate it among the input elements of the SA8000 management review; in this case to the report is recorded.

Note: Recording the report, investigating the case and managing any Non-Compliance are managed whilst fully complying with the confidentiality constraint of the whistle-blower and of the other corporate figures involved (names or circumstances directly attributable to a specific individual must be subject to confidentiality).

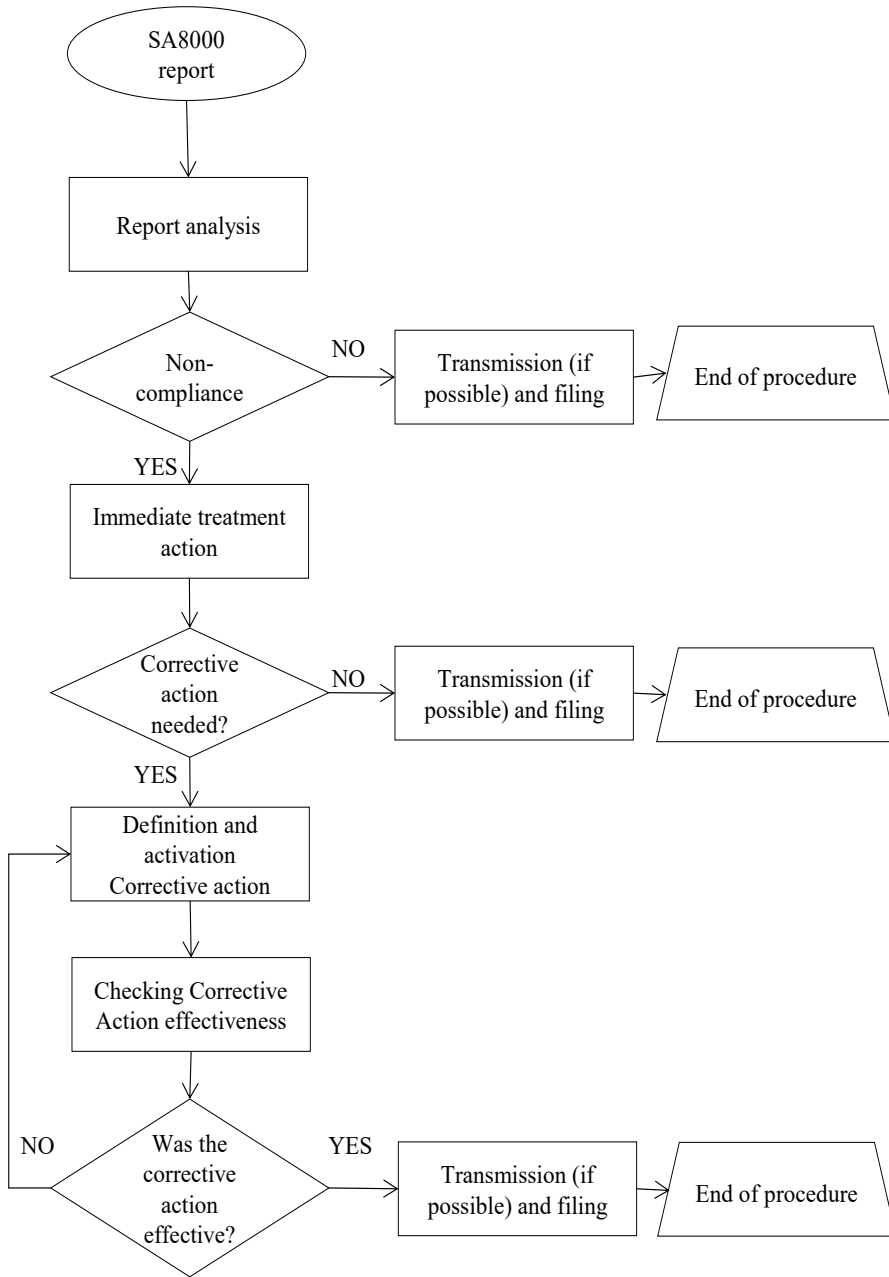


Figure 1 - SA 8000 Whistleblowing Management Process

3.4. SHARING RESULTS

Sharing the results concerning SA8000 reports and findings is guaranteed by:

- As regards the internal interested parties, through periodic publication of the survey management register on the company intranet/notice boards/periodic information.
- As regards the external interested parties, by means of a written reply in relation to the specific requests received.

3.5. REFERENCE DOCUMENTED INFORMATION AND RECORDS

Code	Description