

CHILD LABOR

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1. PURPOSE

This procedure deals with all aspects related to the management of child, forced and compulsory labor and therefore has the purpose of defining the activities that the company would put into practice if minors and / or children were employed by the company.

2. DEFINITIONS

- **CHILD:** is the minor under the age of 16, or still subject to compulsory schooling (Law 977/1967, as amended by Legislative Decree 345/1999 which transposed the EEC directive 94/33);
- **CHILD LABOR:** work performed by a child (SA8000 standard);
- **YOUNG WORKER:** is the minor aged between 15 and 18, who is no longer subject to compulsory schooling; Law 977/1967 as amended by Legislative Decree 345/1999 which transposed the EEC directive 94/33).

3. REGULATORY REFERENCES

Legislative Decree 81: 2008 Health and safety in the workplace

UNI EN ISO 9001 2015: Quality management systems.

UNI EN ISO 37001 2016: Anti-corruption management systems

UNI EN ISO 9004 2000: Guidelines for improvement

Point 7.1 Resources

Point 7.1.2 People

Point 7.2 Competence

Point 7.3 Awareness

Point 7.1.3 Infrastructure

Point 7.1.4 Environment for the operation of processes

Point 7.1.5 Resources for monitoring and measurement

SA 8000 2014: Social responsibility.

International references

- United Nations Convention on the Rights of the Child (2 September 1990);
- ILO Convention 138: Minimum age for admission to work;
- ILO Recommendation 146: Minimum age for admission to work - Commission application tool 138;
- ILO Convention 182 Prohibition and immediate action for the elimination of the worst forms of child labor;
- ILO Recommendation 190 Prohibition and immediate action for the elimination of the worst forms of child labor - Application tool of the ILO Convention 182;
- Convention on the Rights of the Child Child Protection;

National references

- Law 17 October 1967, n. 977 Protection of the work of children and adolescents;
- Legislative Decree 345/99 Protection of young people at work;
- Legislative Decree 262/2000 Supplementary and corrective provisions of Legislative Decree 345/99 regarding the protection of young people at work;
- Legislative Decree 77/2005 Definition of general rules on school-work alternation, pursuant to art. 4 L. 53/2003;

- L.157 / 81 Minimum age for access to work: 15 years in general, 13 for light jobs, 18 for heavy jobs (16 in special cases);
- Law 176/91 art. 28: Right to education for protection from economic exploitation and harmful activities;
- Law 148/2000 Prohibition and immediate action for the elimination of the worst forms of child labor.

4. CHILD LABOR

4.1. Definition of child labor.

The reference standard defines child labor as any work carried out by a child under the age of 15.

FINCANTIERI NEXTECH does not make use of child labor in any case and adopts all forms of support and necessary actions (contractual, auditing, market selection) aimed at ensuring that even in its context, situations in which safety, health and safety do not exist. , the education and development of children is compromised because they are subjected to child labor.

4.2. Criteria adopted

FINCANTIERI NEXTECH DOES NOT use or support the use of child labor, as defined above.

FINCANTIERI NEXTECH establishes, documents, maintains and effectively communicates to staff and other interested parties, written policies and procedures to remedy child labor situations, and provides adequate financial and other support to allow the children involved to attend the school and remain there until they no longer fall within the definition of a child.

FINCANTIERI NEXTECH DOES NOT employ young workers, who are still subject to compulsory education, and therefore fully respects, as they are not applicable, the criteria established by SA8000 regarding:

- The total time spent between school, work and travel (less than 10 hours a day);
- The daily working time (no more than 8 hours a day);
- Work during the night;
- Situations that are risky or harmful to their physical and mental health and to their development, both inside and outside the workplace.

4.3. Initiatives to protect the child/young worker

FINCANTIERI NEXTECH undertakes to respect and disclose to interested parties, both internal and external, its commitment not to take advantage of child labor and to promote all actions aimed at developing the culture of protecting young people at work.

In particular, it undertakes to:

- Only hire people over 18 years of age;
- Respect the collective labor agreements and all the legislation on the employment of minors and young people in the company;
- Respect the legislation that protects the needs related to student workers;
- Activate forms of collaboration with schools and universities, to encourage training courses (internships in the company) aimed at facilitating the integration of young people into the world of work;
- Promote forms of collaboration with Non-Governmental Organizations (NGOs) to support policies for the protection of minors.

During the selection phase of the new candidate, the function manager and the Human Resources manager specify to the selection company in charge, the existence of the age of 18 as a mandatory and essential requirement for any future recruitment.

After the selection during the recruitment phase, the Personnel Administration Office checks the veracity of the personal data, requesting a copy of the identity documents of the residence permit (in the case of citizens not belonging to the European Union) and those required by the CCNL.

4.4. Remedial actions

If, following audits at suppliers, or through any other source of information, the company staff becomes aware of child labor at the company or by suppliers or subcontractors, they immediately notify the Head of the Quality Management and Social Accountability (RDD). The latter opens a N.C. as indicated in the relative procedure and proceeds to immediately notify the Management.

The Management (in collaboration with RDD) undertakes to implement a series of remedial actions aimed at protecting the minor and his family.

In collaboration with the Telefono Azzurro Association, having received the report of the discovery of a minor at work, the Management Representative immediately contacts the Association at 114 Childhood Emergency (free 24 hours a day).

The intervention of the Association provides for an initial assessment over the telephone of the severity of the report of child labor.

In the case of the exploitation of child labor, the local police forces, the local Labor Inspectorate and in some cases also the General Labor Department at the Ministry of Labor are activated.

When it comes to cases of serious exploitation, the Social Services and the appropriate Territorial Agencies are also activated, to develop a personalized path for the effective and effective recovery of the minor.

The remedy project identified must favor in particular:

- A form of support for the minor and his family for lack of work by providing an alternative income to the family unit;
- Ensure that the minor can complete his / her compulsory education, contributing to the payment of school fees, books, transport to school;
- Try to include a family member of the minor in the workforce or alternatively support in the search for a job.

The Management and the Management Representative undertake to identify the methods and find the resources for the implementation of the remedial project.

If, following audits at suppliers, or through any other source of information, the company staff becomes aware of the employment of young workers, this must be ensured, through audits, etc. that the aforementioned workers:

- Are employed only after having completed the scheduled school hours, where they are subject to compulsory education;
- Do not do heavy work;
- Work in safe conditions and are not exposed to dangerous, risky or harmful situations for physical and mental health and for their development;
- Do not come into contact with dangerous equipment;
- Do not work for more than 8 hours a day;
- The hours of work added to the hours of school and those of travel for school and work do not exceed 10 hours;
- Do not work night shifts.

Anyone who knows of violations of the aforementioned conditions must open a non-compliance by immediately informing the Management Representative. NCs are managed as indicated above.