

Child labour

REVISION NUMBER	1
DATE OF APPROVAL	30.09.2021
DESCRIPTION	First issue
DRAFTED	V. De Vita
VERIFIED	N. Minini
APPROVED	N. Minini

PRO-RS-01 Operating Procedure

Contents

Purpose	3
Scope of application	3
References	3
Responsibilities and actions	4
Employment of underage workers within the company	
Use of child labour within the supply chain	
Corrective actions to tackle child labour	
Communication to any stakeholders	
Recipients	8

Purpose

The purpose of this procedure is to define the responsibilities and ways according to which the company:

- monitors the presence of child labour as defined and envisaged by the SA8000 standard;
- defines and implements any corrective actions aimed at resolving all those situations in which child labour should be detected.

Scope of application

This procedure is applied for the management of all those cases, found in the company or at suppliers'/sub-suppliers' premises and of which Roveda becomes aware, regarding:

- people under 16 years of age (children);
- people aged between 16 and 18.

References

Manual for Social Responsibility

PRO-02 - Non-conformities, corrective actions

PRO-08 - Control in the supply chain

It should be pointed out that, according to law, the use of workers under the age of 16 is not permitted in Italy and Roveda has always complied with the law.

Management defines the company policy concerning social responsibility in general and, therefore, also the management of child labour, which is not a secondary aspect at all.

This policy, consolidated for years, led to the avoidance of all sorts of critical issues in the context of child labour, as it was decided not to resort, in any way or on any occasion, to workers under the age of 16.

The employment of underage workers (aged between 16 and 18) is permitted by law and by the CCNL (National Collective Labour Agreement). Despite such possibility, Roveda does not employ underage workers.

There is the possibility that Roveda resorts to foreign suppliers and/or that Roveda's suppliers may in turn subcontract the work to foreign companies for which guaranteeing the absence of child labour is not possible.

Therefore, the company's effort shall be concentrated in monitoring and discouraging the use of child labour within its supply chain, as far as feasible based on Roveda's control and sphere of influence.

The Head of the Management System and the Social Performance Team (SPT) is responsible for applying this procedure and ensuring the effectiveness of any mechanisms for control applied.

Employment of underage workers within the company

Roveda does not use child labour in any way within its activities. The use of personnel under the age of 16 is prohibited by Italian law. In order to ensure the foregoing, a mandatory check of any worker's identity documents is carried out from the moment of the very first meeting, and a copy of such documents shall be acquired and filed in the worker's file concerning the employment relationship, in full compliance with the current legislation concerning privacy.

In the unlikely event that the company hires and employs underage workers (aged between 16 and 18), in favour of which specific laws concerning their compulsory education are in force, the company shall ensure that such underage employees may work outside school hours only, in compliance with the minimum requirements set out by the SA8000 standard or by the national law in case this results to be more in favour of workers.

Furthermore:

- training concerning any risks associated with safety in the workplace shall be given in such a way as to be understandable to any underage personnel;
- a prompt check shall be carried out with regards to compliance with the established requirements by the worker;
- the worker shall not be subject to stressful working conditions (i.e. underage personnel are enabled to take advantage of a greater number of breaks, and overtime work is not allowed for them);
- the worker shall be safeguarded with greater attention than the attention already paid to adult personnel, in relation to any offensive or harmful behaviour;
- adequate protective measures shall be prepared in the Risk Assessment Report drawn up pursuant to (It.) Legislative Decree 81/08.

The Manager of the Management System, in close collaboration with the Social Performances Team, is responsible for verifying compliance with all of the above.

Use of child labour within the supply chain

The company in no way supports the use of child labour within its supply chain or by any of those with whom it comes into contact, thus discouraging all forms of use of child labour of which it should become aware.

Roveda undertakes to assess in advance, at the beginning of any employment relationship, the sensitive characteristics for the purposes of social responsibility of the potential supplier company, including the presence of underage workers.

As far as this is concerned, the PRO-08 "Control of the supply chain" procedure shall be applied.

The non-use of child labour by a supplier is one of the basic conditions for maintaining a contractual relationship with suppliers.

For companies with a high impact on labour (shoe factories, shearing factories, upper factories, other product processing), although the use of child labour is deemed to be very unlikely, the following is required:

- provision of a whole series of company data and self-assessment of compliance with the main requirements of the SA8000 standard, by filling in questionnaires;
- identification of any sub-suppliers who are entrusted with the processing of Roveda products;
- signing of the Roveda's Code of Ethics;
- signing of the aforementioned code even on behalf of sub-suppliers who are entrusted with the processing of Roveda products.

In relation to the aforementioned suppliers, the periodic audit referred to in the procedure PRO-08 "Control of the supply chain" is also performed.

The Manager of the Management System is responsible for assessing any information returning from the control of the supply chain, which may also be received through mass media or stakeholders, in order to identify and remedy the cases listed above. Should the company, during the initial assessment or subsequent monitoring of its suppliers, detect the use of child labour, it shall promptly take any required remedial actions and/or corrective actions and the Management System Manager is responsible for activating the procedure PRO-02 "Non-conformities, corrective actions".

Corrective actions to tackle child labour

Should Roveda become aware of the use of child labour within its supply chain, the Manager of the Management System, in agreement with Management, shall immediately take action to register such anomaly and define the proper corrective action aimed at implementing any remedial measures and eliminating the causes of any problems emerged.

The procedure PRO-02 "Non-conformities, corrective actions" shall be referred to as for this activity.

In order to tackle the case of a child worker or an underage worker, the activities below may be undertaken (non-exhaustive list):

- hiring a parent or relative in order to replace the child and/or underage worker (where possible);
- providing for proper financial support measures for the family (measures to be assessed for each specific case);
- organising the subject's working activity in such a way that such activity does not coincide with normal school hours;
- organising the activities in such a way that the sum of working hours, of the hours at school, and the hours of the commute to and from work and to and from school, do not exceed 10 hours/day, the working hours do not exceed 8 hours/day and provided that work during the night is not possible;
- verifying (and if necessary, promoting) a transport system that allows the worker to move easily and safely between its home, workplace and school;
- precluding or discouraging, as far as possible, work in situations that are risky or otherwise harmful to health.

In view of such cases, Roveda shall make all the necessary efforts to resolve the problems emerged, within the limits of what is feasible in the sphere of corporate influence and from an economic point of view.

Furthermore, among its improvement and support actions, Roveda shall assess the possibility of making donations to organisations that are committed to the fight against child labour.

Responsibilities and actions

Communication to any stakeholders

Roveda shall communicate to the stakeholders its own commitment to avoid the use of child labour through:

for workers

- information given during the meetings;
- information provided to the SPT (Social Performance Team) and to the workers' representatives;
- posting of the company policy on the company notice board;
- making the SA8000 financial statements available;

for external stakeholders

- dissemination of the Company Policy;
- publication on the website of the SA8000 financial statements;
- permanent availability, according to the utmost transparency, to provide information upon request.

The Manager of the Management System is responsible for ensuring the effectiveness of the aforementioned communication procedures.

Recipients

Management
 Manager of the Management System
 Social Performance Team
 Stakeholder