



RECOVERY PLAN AGAINST CHILD LABOR

P04

Rev. 0
del 23.10.18

INDEX

1. GOAL2

2. FIELD OF APPLICATION2

3. REFERENCES.....2

4.OPERATING PROCEDURES.....2

4. 1 POLICY FOR THE PROTECTION OF THE CHILD/YOUNG WORKER2

4.2 AGE VERIFICATION AT THE TIME OF THE INTAKE3

4.3 REMEDIAL ACTIONS IN CASE OF CHILD LABOR3

4.4 INTEGRATION OF YOUNG WORKERS.....3

4.5 MONITORING OF SUPPLIERS4

Rev.	Date	Reason	Drawn up by	Verified by	Approved by
0	23.10.18	1°EMISSION	RSG	RSG	DIR



1. GOAL

In line with the principles and values expressed in the Social Responsibility Policy, LUBE s.r.l. undertakes not to employ workers under the age of 16 and young workers (between the ages of 16 and 18) complies with all the provisions in force under national regulations in order to ensure that they are not exposed to situations that are, outside or inside the workplace, hazardous, dangerous, harmful to health.

Nevertheless, in order to protect children and young workers as fully and comprehensively as possible, this Recovery Procedure is drawn up, laying down the procedures to be adopted by the company and the responsibilities in the recovery activities of child workers in the event of such situations being detected against its suppliers.

2. FIELD OF APPLICATION

This procedure describes how LUBE s.r.l. establishes, documents, keeps active and communicates to the staff any recovery actions in favour of children for whom there is a work situation that is part of the definition of child labour and if there are young workers within the company.

3. REFERENCES

Standard SA 8000: 2014, par 1

International and European references	
Convention ILO 138	Minimum age for admission to employment
Raccomandation ILO 146	Minimum age for admission to work – Application tool Convention 138
Convention ILO 182	Prohibition and immediate action to eliminate the worst forms of child labour
Raccomandation ILO 190	Prohibition and immediate action to eliminate the worst forms of child labour – Application tool Convention ILO 182
Child rights convention	Convention on the Rights of the Child adopted by the ONU on 20 November 1989
Universal Declaration of Human Rights ONU– art. 25	Child protection
European Community with Directive 94/33	Basic principles for working with minors
Nationals references	
Italian Constitution– art. 37	Minimum age limit for work - Child labour protection
Workers' Statute – art. 10	Working students
L.19-01-1955 n.25 L. 8-8-1985 n.443 L. 24-06-1997 n. 196	Apprenticeship and intership contracts
L. 17-10-1967 n. 977	Labour protection for children and adolescents
D. Lgs. 04-08-1999 n.345 (from D. Lgs. 18-08-2000 n.262)	Implementation of Directive 94/33/EC on the protection of young people at work
Charter of commitments - adopted by the Government on 16 April 1998	Charter against child labour committing government, trade unions and entrepreneurs to combat the phenomenon.
Law n. 296/2006	Finance Act 2007 (raising minimum age for starting work)
D.L. 25 june 2008 (art.23)	Repeal of compulsory apprenticeship communications
D. Lgs. 81/2008 (Single Text on Health and Safety at Work) as amended and supplemented by Correction 106/09	Health and safety at work

4. OPERATING PROCEDURES

4. 1 POLICY FOR THE PROTECTION OF THE CHILD/YOUNG WORKER

In order to promote the principles of education for children set out in ILO 146 Racomandation and for young workers, LUBE srl has developed the following policy:

LUBE srl undertakes to respect and disclose to the interested parties, both internal and external, its



commitment not to use child labor either systematically or occasionally and to act as spokesman for a culture of protection of young people at work.

In particular, LUBE S.r.l. undertakes to respect:

- Ccnl and all the regulation on the employment of minors and young workers in the company (internship agreement, apprenticeship, employment contract, forms of alternance school-work, etc.) in accordance with Legislative Decree no. 345 of 1999 and its subsequent amendments;
- legislation to protect the needs of working students;
- forms of cooperation with schools and educational institutions to encourage the integration of young people into employment;
- cooperation with ONGs and local authorities to support child protection policies.

4.2 AGE VERIFICATION AT THE TIME OF THE INTAKE

In order to ensure that no child is wrongly employed in the company, at the time of selection, the RSG of LUBE srl ensures the veracity of the candidate's personal data and, when hiring, requires a copy of the identity documents.

4.3 REMEDIAL ACTIONS IN CASE OF CHILD LABOR

Despite the commitment not to employ workers who fall within the definition of *child*, in the event that the use of a child by its suppliers is detected, the Management of LUBE srl undertakes to implement a series of remedial actions to protect the child and his family. The RSG contacts the institutional bodies and associations active in the sector in order to report such situation of non compliance. RSG also collaborates with the institutions and, directly with the supplier, defines remedial actions aimed at not compromising the child's situation in a negative way.

The recovery plan must indicate:

- the criticality of the child's situation;
- The recovery actions to be undertaken identifying the most suitable for the specific situation.

Aware of the difficulty of managing the situation, the RSG will always make use of the support of associations active in the sector (Telefono Azzurro, local ONGs, etc.), which can provide indications on the most suitable ways to maintain relations with the child and his family as well as for the identification of the most suitable channels for the protection of the child.

The recovery plan must take into account the following aspects:

- ensure a form of support for the child and his family due to lack of work by providing an alternative income to decrease the financial impact on the family;
- ensure that the child can complete his or her compulsory education in accordance with current legislation while promoting orientation to the world of work also through the payment of school fees, books, transport to school;
- try to include in its staff, or alternatively support in the activities of job search, a family member of the minor, in order to ensure the financial support of the family and a lightening of the responsibilities of the minor himself

Identifying the methods and finding the necessary financial resources is the task of the management in collaboration with institutional bodies.

4.4 INTEGRATION OF YOUNG WORKERS

If a young worker who has already completed the compulsory education is employed in the staff, the company undertakes to offer the young worker professional training that reflects his personal



aptitudes. The young worker will be included in a training professional program (as required by current legislation) and compliance with the safety regulations will be guaranteed in order to ensure that it is not exposed to dangerous, risky or harmful situations for health, both inside and outside the place of Work.

In particular in the case of young workers LUBE S.r.l undertakes to:

- not to expose young workers to dangerous job (e.g. exposure to physical, biological, chemical agents or particular processes)
- total prohibition of night working;
- compliance with the legislation on weekly rest.

4.5 MONITORING OF SUPPLIERS

RSG shall ensure that suppliers are made aware of the principles of SA 8000 so that they do not use child labour and that they undertake, in writing, to respect this principle, by signing the declaration of commitment issued by the supplier. The respect of this requirement is fundamental for a lasting business relationship with LUBE s.r.l.

LUBE undertakes also to verify that there are no situations of child labour among its suppliers that do not provide for compliance with the relevant legislation.

In case of the identification of:

- use of young workers for whom the requirements are not observed,

the functions in charge communicate the situation detected to the management representative for social accountability to promptly contact the institutional bodies and associations active in the sector in order to report such situations of non-compliance. Furthermore, the Management representative for social responsibility collaborates with the institutions and defines remedial actions directly with the supplier aimed at not negatively compromising the situation of the minor worker. Such actions must be recorded by the Management representative for social responsibility and kept constantly under control.