

	PROCEDURA DI RECUPERO CONTRO IL LAVORO INFANTILE	P04
		Rev. 1 del 18.07.24

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1. PURPOSE

In line with the principles and values expressed in the Social Responsibility Policy, LUBE S.r.l. is committed to not employing workers under the age of 16. For young workers (aged between 16 and 18), the company complies with all applicable national regulations to ensure that they are not exposed to situations—whether inside or outside the workplace—that are risky, dangerous, or harmful to their health.

Nonetheless, in order to provide the most comprehensive protection possible for children and young workers, this **Child Labour Remediation Procedure** has been drawn up. It defines the procedures that the company would adopt, as well as the responsibilities involved, in the remediation of child labour cases should such situations be identified among its suppliers.

2. SCOPE

This procedure outlines how LUBE S.r.l. establishes, documents, maintains, and communicates to its personnel any remediation actions in favour of children found to be in a work situation that falls under the definition of child labour, as well as the procedures to be followed in case young workers are present within the company.

3. REFERENCES

SA8000:2014 Standard, Paragraph 1

International and European References	
ILO Convention No. 138	Minimum age for admission to employment
Raccomandazione ILO 146	Età minima di ammissione al lavoro – Strumento applicativo della Convenzione 138
ILO Recommendation No. 146	Minimum age for admission to employment – Supplementary instrument to Convention No. 138
ILO Convention No. 182	Prohibition and immediate action for the elimination of the worst forms of child labour
ILO Recommendation No. 190	Prohibition and immediate action for the elimination of the worst forms of child labour – Supplementary instrument to ILO Convention No. 182
Convention on the Rights of the Child	Adopted by the United Nations General Assembly on 20 November 1989
Universal Declaration of Human Rights Article 25	Protection of children
National References (Italy)	
Italian Constitution – Article 37	Minimum working age – Protection of minors at work
Workers' Statute – Article 10	Working students
L.19-01-1955 n.25 L. 8-8-1985 n.443 L. 24-06-1997 n. 196	Apprenticeship and internship contracts
L. 17-10-1967 n. 977	Protection of children and adolescents in the workplace
Legislative Decree No. 345 of 4 August 1999, as amended and supplemented by Legislative Decree No. 262 of 18 August 2000	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	Agreement against child labour involving the government, trade unions, and employers
Law No. 296/2006 – 2007 Finance Law (raising the minimum age for entering employment)	2007 Finance Law (raising the minimum age for entering employment)
Law Decree of 25 June 2008 (Art. 23) – Repeal of mandatory apprenticeship notifications	Abolition of the obligation to submit mandatory apprenticeship-related notifications

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Legislative Decree No. 81/2008 (Consolidated Law on Health and Safety at Work), as amended by Legislative Decree No. 106/2009	– Health and Safety in the Workplace
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4. OPERATING PROCEDURES

4.1 POLICY FOR THE PROTECTION OF CHILDREN/YOUNG WORKERS

LUBE S.R.L., IN ORDER TO PROMOTE THE PRINCIPLES OF CHILDREN'S EDUCATION AS DEFINED IN ILO RECOMMENDATION NO. 146, AND TO SUPPORT YOUNG WORKERS, HAS DEVELOPED THE FOLLOWING POLICY:

LUBE S.R.L. IS COMMITTED TO RESPECTING AND COMMUNICATING TO ALL INTERESTED PARTIES, BOTH INTERNAL AND EXTERNAL, ITS PLEDGE NOT TO MAKE USE OF CHILD LABOUR—NEITHER SYSTEMATICALLY NOR OCCASIONALLY—AND TO ACTIVELY PROMOTE A CULTURE OF PROTECTION FOR YOUNG PEOPLE IN THE WORKPLACE.

IN PARTICULAR, LUBE S.R.L. UNDERTAKES TO RESPECT:

- THE APPLICABLE COLLECTIVE LABOUR AGREEMENTS AND ALL LEGISLATION CONCERNING THE EMPLOYMENT OF MINORS AND YOUNG WORKERS IN THE COMPANY (E.G. INTERNSHIP AGREEMENTS, APPRENTICESHIP CONTRACTS, WORK PLACEMENT CONTRACTS, SCHOOL-TO-WORK TRANSITION PROGRAMS), IN COMPLIANCE WITH LEGISLATIVE DECREE NO. 345/1999 AND ITS SUBSEQUENT AMENDMENTS;
- THE REGULATIONS THAT PROTECT THE RIGHTS AND NEEDS OF WORKING STUDENTS;
- COLLABORATIVE INITIATIVES WITH SCHOOLS AND EDUCATIONAL INSTITUTIONS TO SUPPORT YOUTH INTEGRATION INTO THE WORKFORCE;
- PARTNERSHIPS WITH NGOS AND LOCAL AUTHORITIES TO SUPPORT POLICIES AIMED AT PROTECTING MINORS.

4.2 AGE VERIFICATION AT THE TIME OF HIRING

The Social Responsibility Manager (RSG) of LUBE, in order to ensure that no child is mistakenly employed by the company, verifies the accuracy of the candidate's personal data during the selection process and, at the time of hiring, requests a copy of the candidate's identity documents.

4.3 REMEDIATION ACTIONS IN CASE OF CHILD LABOUR

Despite the commitment not to hire workers who fall under the definition of a child, if child labour is found among its suppliers, the management of LUBE S.r.l. commits to implementing a series of remediation actions aimed at protecting the child and their family. The Social Responsibility Manager (RSG) promptly contacts institutional bodies and organizations active in the field to report such non-compliance. Furthermore, the company collaborates with these institutions and directly works with the supplier to define remediation actions that do not negatively affect the child's situation.

The Remediation Plan must specify:

- The severity of the child's situation;
- The remediation actions to be undertaken, identifying those most appropriate for the specific case.

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Aware of the complexity of managing such situations, the RSG will always rely on the support of organizations active in the sector (such as Telefono Azzurro, local NGOs, etc.), which can provide guidance on the most suitable ways to maintain relationships with the child and their family, as well as to identify the best channels for the child's protection.

The identified Remediation Plan must consider the following aspects:

- Ensure a form of livelihood for the child and their family due to the loss of work by providing an alternative income to reduce the financial impact on the family;
- Guarantee that the minor can complete their compulsory education as required by current legislation, while also promoting orientation towards the workforce through support such as payment of school fees, books, and transportation;
- Attempt to employ, within its own workforce, or alternatively support in the job search, a family member of the minor to ensure the family's financial support and to relieve the minor of responsibilities.

It is the responsibility of management, in collaboration with institutional bodies, to identify the methods, find the necessary financial resources, and secure their availability.

4.4 INTEGRATION OF YOUNG WORKERS

IN THE EVENT THAT A YOUNG WORKER WHO HAS COMPLETED COMPULSORY SCHOOLING IS HIRED BY THE COMPANY, LUBE S.R.L. COMMITS TO OFFERING THE INDIVIDUAL PROFESSIONAL TRAINING THAT REFLECTS THEIR PERSONAL APTITUDES. THE YOUNG WORKER WILL BE ENROLLED IN A PROFESSIONAL TRAINING PROGRAM (AS REQUIRED BY APPLICABLE REGULATIONS), AND COMPLIANCE WITH SAFETY REGULATIONS WILL BE ENSURED TO GUARANTEE THAT THEY ARE NOT EXPOSED TO DANGEROUS, RISKY, OR HARMFUL SITUATIONS TO THEIR HEALTH, BOTH INSIDE AND OUTSIDE THE WORKPLACE.

IN PARTICULAR, IN THE CASE OF YOUNG WORKERS, LUBE S.R.L. UNDERTAKES TO:

- NOT EXPOSE YOUNG WORKERS TO HAZARDOUS TASKS (E.G., EXPOSURE TO PHYSICAL, BIOLOGICAL, CHEMICAL AGENTS OR PARTICULAR PROCESSING ACTIVITIES);
- ABSOLUTELY PROHIBIT NIGHT WORK;
- COMPLY WITH CURRENT REGULATIONS REGARDING WEEKLY REST PERIODS.

4.5 SUPPLIER MONITORING

The Social Responsibility Manager (RSG) raises awareness among suppliers about respecting the principles set forth by the SA 8000 standard to ensure they do not use child labour and that they commit in writing to uphold this principle by signing a declaration of commitment issued by the supplier. Compliance with this requirement is considered fundamental for maintaining a long-term commercial relationship with LUBE S.r.l.

Furthermore, LUBE undertakes to verify through periodic audits conducted by the designated functions that no cases of child labour or underage work exist among its suppliers without compliance with the applicable laws and regulations. In the event that the following are identified:

- Use of child labour by the supplier;
- Use of young workers without compliance with the required standards;

the designated functions shall report the findings to the Social Responsibility Manager, who will promptly contact institutional bodies and organizations active in the field to report such non-

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compliance. Moreover, the Social Responsibility Manager collaborates with the institutions and directly works with the supplier to define remediation actions aimed at not adversely affecting the situation of the underage worker. These actions must be documented by the Social Responsibility Manager and continuously monitored.