

CANTINERIONDO SpA	Management of child labour and young workers	Ver. 03
		Dated 05/03/2021
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Versions

Number	Description
0	Issuance of the Procedure
1	Paragraph 6.5 introduced regarding the hiring of "young workers" as interns
2	Restyling and adding par 6 "Reference and recording documents"
3	Company new logo and General Manager

Checked	Approved
UP (signed in Italian version)	DG (signed in Italian version)

Distributed to	Company noticeboard and published on the website
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1. PURPOSE AND SCOPE

The aim of this procedure is to define the management of child labour and young workers (juvenile apprentices), and to define operating procedures should situations arise in which the presence of child labour or work performed by young people is ascertained. This procedure applies to Cantine Riondo Spa (here in after referred company or Riondo) and also involves its suppliers and contractors.

As expressed in the international SA8000 standard and in compliance with current legislation, Riondo does not use or support child labour. The company believes that it is essential to safeguard children's right to education during compulsory school age and therefore rejects and condemns any form of child labour.

With regard to adolescent workers who are no longer of compulsory school age: if the company is in a position to hire such workers, then it shall comply with the provisions of the sector national collective bargaining agreement ("CCNL").

2. DEFINITIONS

"Child" any person under the age of 16;

"Young worker" any person over the age of a child, as defined above, and under the age of 18;

"Child labour" work carried out by any person below the age specified in the definition of "child".

3. REGULATORY REFERENCES

(Italian) Legislative Decree no. 81/08 and subsequent amendments and integrations

(Italian) Legislative Decree no. 231/001 - organisational and management model

(Italian) UNI-INAIL guidelines

Risk Assessment Documents (in Italian: "DVR")

(Italian) Law no. 977 dated 17/10/1967 and subsequent amendments and integrations

(Italian) Legislative Decree no. 345/1999 Protection of young people at work

(Italian) Legislative Decree no. 262/2000 Supplementary and corrective provisions of (Italian) Legislative Decree no. 345/1999

(Italian) Law no. 296/2006 Increase of the age for access to employment from 15 to 16

ILO Convention 138; 146; 182

SA8000 Social responsibility 8000 - Social responsibility requirements - point 1 "Child labour"

4. RESPONSIBILITY

The HR department at Riondo (UP) are responsible for implementing this procedure and the SA8000 management representative (RdDSA8000) monitors the implementation.

5. OPERATING PROCEDURES

Copies of the identity documents requested during the preliminary interviews, employment contracts, records of working hours, wages and reports for young workers certifying the professional skills acquired, are kept by the UP in a dedicated archive, also electronic (PR38).

5.1 Checking age at the time of recruitment

When selecting candidates to recruit a new employee the company verifies the applicant's age by checking a valid identity document (identity card, driving licence, birth certificate, etc.). Riondo categorically excludes the employment of a child (under 16 years of age). If staff from "Temporary Employment Agencies" are used, the company check that there are no workers under the age of 16 when they enter the company, and will not accept anyone under this age.

5.2 Young workers

Where the company employ young workers, interns, apprentices or trainees (aged between 16 and 18), it must:

- assign them an *internal mentor* who shall provide the necessary training for the tasks assigned to them
- ensure that they work safely and are not exposed to hazardous or harmful situations
- ensure that they do not carry out heavy work
- ensure that they do not come into contact with dangerous equipment/appliances when carrying out their assigned task
- ensure that under no circumstances do they work more than 8 hours a day or during the night
- in the case of students, ensure that work is not carried out during school hours and check that the total number of hours spent between school, work and travelling does not exceed 10 hours per day
- draw up a report at the end of the apprenticeship period, certifying the professional skills acquired

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Further details on management are provided in the document "IO 39.01".

5.3 Raising awareness and monitoring suppliers

Riondo requires its suppliers to sign a letter of commitment in which they certify compliance with the fundamental principles contained in the SA8000 standard, which forms the basis of social responsibility. One of these fundamental principles is not to use or support *Child Labour*. Compliance with this requirement is essential to create and maintain the business relationship. If a supplier or contractor refuses to sign this commitment, then their relative qualification process will be temporarily suspended.

5.4 Remedial actions

If, following an audit, or through any other source of information, the company finds out that *Child Labour* is being used by suppliers or contractors or in-house, then the following actions must be implemented or put in place.

5.4.1 Investigation activities

An investigation must be carried out

- the RdDSA8000 collect information about the reasons that led the child to work (poverty, family's lack of livelihood, etc.) and his/her family composition
- then Riondo's pertaining scope for intervention is identified (e.g. current laws on the subject), along with the type of influence that the company may have in ensuring the child gets an education and some form of sustenance.

5.4.2 Actions to be taken in relation to the specific nature of each case

Actions to be taken	Children under the age of 16	Young workers over the age of 15 and under the age of 18
Report the situation to the Local Authorities and work with them to find a solution to the child's hardship	X	X
Work with local organisations to resolve any situations of the child lacking sustenance.	X	X
Use trade associations, personal acquaintances, customers and suppliers to search for a job for the child's relatives, who can then use their employment to meet any financial needs.	X	X
If possible, hire the child's family members in order to provide the family with financial support	X	
Provide the child, if he/she is an adolescent who has not completed his/her compulsory schooling, with light and safe work (in compliance with legal requirements regarding the use of equipment and the risks to which he/she may not be exposed), at times and following procedures that allow the adolescent to continue with their schooling (checking that the total of work, study and travel time does not exceed 10 hours, assigning work shifts during the day and at times when they don't have to be at school, not assigning night shifts, and not imposing more than 8 hours of work per day).		X

5.5 Hiring interns (young workers)

The management of Riondo undertakes to guarantee the possibility of welcoming "young workers" as part of training courses that alternate between school and work.

"Young workers" may be placed in the following company departments:

- Offices (purchasing, logistics, administration, quality control, HR, laboratory)
- Production departments (exempt from carrying out hazardous activities as defined in IO 39.01)

The head of department must ensure that the number of interns does not exceed one per department/division and that employees acting as mentors comply with the requirements described in IO 39.01.

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5.6 Dissemination of the principles

The principles expressed in the following procedure are disseminated in the following way:

- this procedure is posted on the company notice board
- Staff are provided with training
- this procedure is published on the website
- this procedure is made available to all other stakeholders upon request

6. REFERENCE AND RECORDING DOCUMENTS

PR38 Management of human resources

IO 39.01 Management of trainees and minors