



Child / Minor Labor Procedure

**According to
SA8000 Standard**

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SA8000 Standard References

4.1	Child Labor
4.1.1	The organization shall not engage in or support the use of child labor as defined above.
4.1.2	The organization shall establish, document, maintain, and effectively communicate to its personnel and other interested parties policies and written procedures for remedying situations of child labor, and shall provide adequate financial and other support to enable children involved to attend school and remain there until they are no longer considered children.
4.1.3	The organization may employ young workers, but where they are subject to compulsory education, they shall work only outside school hours. Under no circumstances shall the total time spent on school, work, and commuting exceed 10 hours per day, and young workers shall not work for more than 8 hours per day. Working at night is not permitted.
4.1.4	The organization shall not expose children or young workers to situations that are hazardous or harmful to their physical and mental health and development, both inside and outside the workplace.

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1. Purpose

Meeting Group S.p.A. declares that it has not employed workers under the age of 16 within its organization and commits to not employing workers in this age group in the future, thanks to the implementation of this procedure that regulates the hiring process.

The hiring of Young Workers (aged between 16 and 18 years) will be carried out in full compliance with the current national regulations¹, and the company ensures that no minors have been or will ever be exposed to risky, dangerous, or harmful situations to their health, both inside and outside the workplace.

Additionally, this procedure establishes the course of action that Meeting Group S.p.A. will take in the event of identifying, among its suppliers and/or contractors, the presence of underage workers and the use of improper and harmful practices towards these categories of individuals.

¹ D.Lgs. 262/2000 and Articles 1 and 8 para. 2 of law no. 977/1967.

2. Regulatory References

- SA8000 – Social Accountability 8000 (IV Social Responsibility Requirements, point 1. “Child Labor”).
- ILO Convention 138 and Recommendation 146 (Minimum Age).
- ILO Convention 182 (Worst Forms of Child Labour).
- Universal Declaration of Human Rights.
- United Nations Convention on the Rights of the Child.
- United Nations Guiding Principles on Business and Human Rights.
- Article 32 of the Charter of Fundamental Rights of the European Union.
- Article 37 of the Italian Constitution.
- Legislative Decree August 4, 1999, no. 345 (Implementation of Directive 94/33/EC on the protection of young people at work) and Legislative Decree August 18, 2000, no. 262 (Supplementary and corrective provisions of Legislative Decree August 4, 1999, no. 345, on the protection of young people at work, in accordance with Article 1, paragraph 4, of Law April 24, 1998, no. 128).
- Law October 17, 1967, no. 977 (Protection of the employment of children and adolescents).
- Article 10 of the Workers' Statute (Student Workers).

3. Terms, Definitions, and Acronyms

- **Child:** Any individual below the age of 16;
- **Child Labor:** Any work performed by a child below the age(s) specified in the definition of child, except as provided in ILO Recommendation 146;
- **Personnel:** All individuals employed by an organization or with any other contractual relationship, including but not limited to: directors, executives, managers, supervisors, employees, workers, and individuals with any form of contract, such as security guards, cafeteria staff, dormitory attendants, and cleaners;
- **Worker:** All personnel without management responsibilities;
- **Remedial Actions for Child Labor:** Any form of support and actions necessary to ensure the safety, health, education, and development of children who have been subjected to child labor as defined above and whose work has ended;
- **Young Worker:** Any individual who has surpassed the age of a child (16 years), as defined above, and has not yet reached 18 years;
- **Company:** Meeting Group S.p.A.

4. Responsibilities

The responsibility for ensuring full compliance with and adoption of the procedures against child and minor labor within the Company, as defined by Meeting Group S.p.A., lies with the SA8000 Management Representative, in collaboration with other company members of the Social Performance Team (SPT), including the Administration Manager.

5. Operational Procedures

5.1. Child and Young Worker Protection Policy

Meeting Group S.p.A., as a proponent of values of responsibility and respect towards its employees, categorically rejects the hiring of new personnel classified as Children, i.e., under the age of 16, under any circumstances.

Currently, Meeting Group S.p.A. has no intention to hire individuals under the age of 18 (categorized as Young Workers) outside of educational initiatives and projects mandated by Italian regulations. At present, the Company employs personnel categorized as Young Workers solely under the conditions related to School-Work Alternation (PCTO). In such cases, Meeting Group S.p.A. assumes the role of an entity safeguarding the employee's health and growth. Meeting Group S.p.A. allows Young Workers to work on-site only outside of school hours and ensures that, under no circumstances, the total time spent between school, work, and commuting exceeds ten hours per day. Furthermore, the Company verifies and monitors that, in no case, the working hours exceed eight hours per day and categorically excludes night work. It is the responsibility of the SPT to monitor the situation of each Young Worker and ensure the reduced risk of the employee's daily activities and the compliance of work shifts with the school schedule.

Specifically, the tasks that a Young Worker may perform within the Company include:

- Pattern-making office and graphic office;
- Administrative or accounting activities;
- Sales Department.

Under no circumstances will Meeting Group S.p.A. expose Children and Young Workers to situations that are hazardous or harmful to their physical and mental health and development, both inside and outside the workplace.

This Child and Young Worker Protection Policy extends to all collaborators and suppliers of the Company.

5.2. Procedure: Age Verification at Hiring

With the intention of adhering to the principles described above, Meeting Group S.p.A. will undertake the verification of the candidate's age prior to any potential hiring.

It will be the responsibility of the SPT to proceed with the candidate's age verification through a careful analysis of their personal data. In order to conduct this investigation, Meeting Group S.p.A. will have the responsibility and obligation to request a valid identification document from the candidate, including an ID card, driver's license, or passport. The Company, after receiving and thoroughly verifying all the documentation, will not, under any circumstances, retain the original documents but will keep a copy of them as evidence of compliance with the company's policies and regulations.

In the event that, following internal checks within the Company (including by third parties) or reports from employees regarding cases of child labor or minor labor that do not conform to company policies and this procedure, it becomes necessary to immediately report the situation to the SA8000 Management Representative. Individuals who become aware of a non-conformity related to child or minor labor or the exploitation of young workers must complete a dedicated form for SA8000 reporting, which may be either personalized or anonymous.

Upon receiving a report of a potential violation of company policies and procedures regarding child or minor labor within Meeting Group S.p.A., the Company will initiate an investigation into the report, involving relevant parties. The Social Performance Team will be responsible for analyzing the case by conducting interviews with employees using the "Non-Conformity Management Survey" document, available in both Italian and English to ensure understanding by all parties involved. In case of actual irregularities, Meeting Group S.p.A. will implement specific remedial actions, as outlined in the "Risk Assessment" document.

With the aim of further monitoring the situation within the Company, Meeting Group S.p.A. annually distributes the "Anonymous Survey on the Social Responsibility Management System" document. This anonymous questionnaire guides the staff through all the points of the Standard and allows for a more detailed analysis of the current situation within the Company. The questionnaires should be submitted, either via email or through the physical mailbox located at the entrance of the Lancenigo (TV) facility, to the Social Performance Team for review.

If the report concerns non-compliance with SA8000 Standard regarding child or minor labor practices or the exploitation of young workers by suppliers or third-party companies, please refer to Chapter 5.4 of this procedure.

5.3. Remedial Actions in Case of Child / Minor Labor

In the event of actual irregularities, Meeting Group S.p.A. will implement specific remedial actions. Specifically, the Company will promptly report the case, requesting the involvement of social workers, and initiate contract termination procedures.

Subsequently, the Company will commit to providing financial support to the individual (under the age of 16) to enable them to attend school and stay there until they no longer fall within the definition of a Child. Each instance in which child or minor labor practices are identified is documented and reviewed by the Social Performance Team, which logs the case in the "Internal Evidence Register" document⁹. Within this plan, appropriate and accurate records of all cases of child or minor labor are reported. Case records will be kept in a specific register.

5.4. Supplier Management

Meeting Group S.p.A. is committed to establishing relationships with suppliers and third-party companies based on the same principles of safeguarding the health and well-being of its employees.

To engage in working relationships with other companies, Meeting Group S.p.A. requires and retains a written declaration in which the third party confirms its compliance with the policies and procedures against the exploitation of Children and Young Workers.

Specifically, Meeting Group S.p.A. will annually send the "Self-Assessment Questionnaire for the Social Responsibility Management System" document to all its suppliers, which must be completed and forwarded to the Social Performance Team. The document will be provided in Italian for companies located within the national territory, while for suppliers located abroad, the document will be sent in English for completion. Upon receipt of the completed questionnaire, the Social Performance Team will analyze it to confirm whether the suppliers comply with the requirements outlined in the Social Responsibility Management System implemented by Meeting Group S.p.A. The Social Performance Team has the option to conduct on-site audits within its suppliers to verify the accuracy of their declarations.

In cases where situations related to the exploitation of Children or Young Workers are identified through the "Self-Assessment Questionnaire for the Social Responsibility Management System" or during on-site audits, these cases must be reported to the SA8000 Management Representative. The Social Performance Team will then analyze the case in detail by interviewing the personnel of the third-party company. If the analysis confirms the reported situation, the Social Performance Team will communicate the outcome to the Management, who will issue a written warning to the top management of the partner company, requesting immediate corrections and alignment with Meeting Group S.p.A.'s policy. Upon receiving communication of alignment with the SA8000 Standard, the Social Performance Team may conduct an audit at the third-party company to confirm compliance with the Standard.

In the event of confirmation of non-conformity, in the initial phase, Meeting Group S.p.A. will issue a warning to the third-party company, requesting alignment with the SA8000 Standard within 60 days from the warning. If, following a second audit by the Social Performance Team, the situation remains similar to the previous one, Meeting Group S.p.A. will need to analyze the actions to be taken against the involved party. Depending on the severity of the identified and unresolved non-conformity, Meeting Group S.p.A. may also have the option to terminate any working relationship with the third-party company.

All reports of non-conformities regarding policies and procedures implemented by Meeting Group S.p.A. found within suppliers and third-party companies will be recorded in the "External Evidence Register" document.

5.5. Dissemination Methods for Policy and Procedure

Meeting Group S.p.A. is committed to disseminating the company's policy and procedures related to child and minor labor.

With the aim of spreading corporate principles, Meeting Group S.p.A. pledges to post the Social Responsibility Management System policy¹² on the company bulletin board, along with all necessary references for consulting this child and minor labor procedure. All documentation displayed on the company bulletin board will be replaced with the latest versions based on the semi-annual and annual updates conducted on the Management System.

Additionally, the Company is committed to sharing the key information contained in this procedure in the following ways:

- Periodic email distribution to each employee and relevant third parties involved.
- Inclusion within the annual safety training for employees.