

	CORRECTIVE ACTIONS PROCEDURE FOR CHILD LABOUR	IO SA1.2	
		ED 1 REV 0	01/07/21

INTRODUCTION

Following the principles and values expressed in our Policy, we, at Cadicagroup, commit ourselves to not employing child labour (less than 16 years old). In the event that young workers are employed (age between 16 and 18), enforced provisions and national laws are followed, in order to guarantee that young workers are not subjected to hazardous, dangerous and/or harmful situations to their health and safety, inside or outside the workplace. Furthermore, this Procedure for corrective actions is written with the scope, also precautionary, to safeguard children and young workers in the most complete and thorough manner. It settles the modalities and responsibilities adopted by Cadicagroup in case corrective actions shall be implemented when, and if, minor and/or young workers are found in the company or by our suppliers.

1 SCOPE

The Scope of this Procedure is to provide indications related to corrective actions favoring children and young workers, in the event they are found in a working condition included in the abovementioned cases.

2 APPLICATION

This Procedure is applied to all Cadicagroup processes and to its suppliers and sub-suppliers.

3 DEFINITIONS AND ABBREVIATIONS

ISM	Integrated System Management
ISR	Integrated System Representative
SM	Senior Management
WHS	Workers Health and Safety

4 RESPONSIBILITIES

ISR has the responsibility to verify, update and spread this Procedure.

SM has the responsibility to ensure that this Procedure is enforced.

5 OPERATIONAL MODALITIES

5.1 Children / Young worker Safeguard Policy

We, at Cadicagroup, promote the principles of children education defined in the ILO 138 Convention and ILO 146 Recommendation (minimum eligible working age), stating what follows:

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Cadicagroup is committing itself to respecting and spreading to all its stakeholders, both internal and external, the principle of non-employment of children, not in a systematic nor in an occasional manner. Also, we commit ourselves to becoming spokesperson of the culture of young workers and children safeguard.

In particular, Cadicagroup is committing itself to respecting:

- Collective labour agreements and all rules on the employment of children and young workers within the company (internship, apprenticeship, integration contracts, school-work alternation, etc...);
- The regulation that safeguards the needs connected to working students;
- Partnerships with schools and education entities to favor the integration of young people in the working context;
- Partnerships with NGOs and local entities to support the policies of children safeguard

5.2 Age verification when hiring

The HR Manager requests, for obvious reasons when hiring, the copy of ID, copy of residency permit (when necessary), and copy of documents required by the current regulations. Therefore, any risk in erroneously hiring children shall be excluded.

5.3 Corrective Actions in the event of Child Labour

Despite the commitment of respecting the non-employment of children and young workers policies, in the event that children are found working by a supplier, the Senior Management of Cadicagroup collaborating with the ISR shall enforce corrective actions aimed at safeguarding the child and their family.

ISR shall contact immediately the institutional bodies and active associations of the sector in order to report the non-conformity situation. Moreover, they collaborate with the institutions and define directly with the supplier the corrective actions destined not to negatively compromise the child's situation.

The Action Plan shall indicate:

- Level of criticality for the child;
- Corrective actions to implement, identifying the most adequate for the specific situation.

Aware of the difficulty of managing the situation, the ISR shall always have the support of active associations of the sector that can provide indications on the most adequate modalities to create a relationship with the child and their family, and to identify the most suitable channels for the child's protection.

The identified Action Plan must take into account the following aspects:

- Granting a form of support to the child and their family for the lack of work, providing an alternative method of payment to minimising the financial impact on the family;

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- Guaranteeing that the child can finish their mandatory educational studies according to what is established by the current regulations; equally promoting placement activities through paying school taxes, books, and transportation from home to school;
- Looking forward to hiring, supporting the job searching or one child's relative, in order to assure the financial support of the family and unburden the child from any responsibility.

It is a duty of the Senior Management in collaboration with institutional bodies to identifying the modalities and finding the necessary financial resources and their locating.

5.4 Hiring of young workers

In the event that a young worker is hired (age between 16 and 18), who is no longer obliged to pursue an educational path, Cadicagroup is committing itself to providing a professional education that denotes the young worker personal inclinations.

The young worker will be integrated in a professional education program (as required by the current regulations), and the company will abide by the rules regarding health safety to assure that the young worker is not subjected to hazardous, dangerous and/or harmful situations to their health and safety, inside or outside the workplace.

In particular, the ISR is committing themselves to:

- Not exposing young workers to hazardous activities (e.g., physical, biological, chemical agents or specific working processes);
- Absolute prohibition of night shift;
- Abidance of the current regulations regarding weekly rest.

5.5 Suppliers Management

The ISR shall raise awareness of the abidance of the SA8000 Standard principles by suppliers, in order for them not to turn to child labour. Furthermore, suppliers shall, through a declaration in written form, commit themselves to comply with the principles of the Standard. Such requirement is fundamental for an enduring commercial relationship with Cadicagroup.

In addition, at Cadicagroup, we commit ourselves to inspecting our suppliers in order to assure that no situations of child labour is against the law.

If the following are identified:

- Child labour by the supplier,
- The laws are not complied regarding young workers,

the ISR shall immediately contact the institutional bodies and the active associations of the sector in order to report the non-conformity situations. Also, ISR collaborates with the institutions and defines directly with the supplier the corrective actions to undertake, in order not to negatively compromise the child's situation. Such corrective actions shall be recorded by the ISR and constantly checked.

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6 REFERENCES

ILO 138 Convention

ILO 146 Recommendation

Social Accountability Manual – par. 4.1

7 ARCHIVING

All ISM shall be archived by the ISR and kept in digital form permanently, including the records providing evidence of corrective action.