


LIU·JO	Social Responsibility System Procedure	PRO.01 Rev.2
	REMEDY FOR CHILD LABOUR	

STATUS OF REVISIONS

Rev. No.	Reason for revision	Rev. Date
0	First issue	01.03.2019
1	Update of company name	18 April 2024
2	Update of contact details and operating procedures	16 January 2026

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1. PURPOSE

This procedure sets out the operating procedures adopted by EXELITE SpA to address any instances of child labour and to protect young workers.

In particular, the operating procedures adopted aim to:

- a. ensure the safety, health, education and development of children for whom a situation falling within the definition of child labour has been identified and from which they have been removed, ensuring continuous monitoring to support the effectiveness of the actions implemented
- b. ensure adequate protection for any young workers employed, promoting the necessary measures to prevent potential risks to their health and safety and to foster a suitable path of professional growth and psycho-physical development

2. SCOPE OF APPLICATION


This procedure applies to the entire EXELITE SpA organisation. EXELITE SpA does not, under any circumstances, use child labour.

In accordance with the SA 8000 standard, EXELITE SpA also requires its suppliers to undertake not to use or support the use of child labour, monitors compliance with this requirement, and verifies that this requirement is also met by subcontractors [ref. PG 09.10 Supplier Management]

3. DEFINITIONS

In accordance with the SA8000:2014 Standard, the following definitions apply:

Child	Any person under the age of 15, except where local laws establish a higher minimum age for access to work or for compulsory schooling, in which case the higher age applies locally (currently 16 years in Italy).
Young worker	Any worker who is no longer a child, as defined above, and who has not yet reached the age of 18 years of age
Corrective action	An action designed to eliminate the root cause(s) of an identified non-conformity. Corrective actions are taken to prevent the non-conformity from recurring
Non-conformity	Failure to meet a requirement
Child labour	Any work performed by a child below the age specified in the definition of a child above, except as provided for in ILO Recommendation 146 (Minimum Age)
Remedial action for child labour	Any form of support and action necessary to ensure the safety, health, education and development of children who have been subjected to child labour, as defined above, and whose work has ceased
Subcontractor	Any entity or individual in the supply chain that supplies the supplier with goods and/or services incorporated into, or used in or for, the production of goods or services by the organisation or one of its suppliers
SPT	Social Performance Team: responsible for implementing all elements of SA8000
ILO	International Labour Organisation

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4. RESPONSIBILITIES

The Social Performance Team and the Human Resources department are responsible for the correct application of the procedure.

5. OPERATING PROCEDURES

As stated above, EXELITE SpA does not use child labour in any way. As a further safeguard, EXELITE SpA has specific procedures in place for the selection and recruitment of workers; these procedures set out the documentation that must be provided by the worker for the purposes of recruitment and to verify the candidate's age.

EXELITE SpA also requires that this commitment be upheld by its subsidiaries and suppliers.

EXELITE SpA employs minors only for the following activities:

- photo or video shoots for the creation of look books relating to its products
- to carry out production trials from a modelling perspective.

These activities are typical of the fashion sector.

In such situations, contracts are signed on a case-by-case basis with agencies in the sector, which define the duration and appropriate remuneration for the minor in accordance with the following steps:


- Casting call: agencies are contacted, and fees, rights and duration are agreed;
- Once the children have been selected and confirmed for the job, all the necessary documentation is gathered for the Labour Inspectorate (date, times, documents and the headteacher's authorisation) so that the Inspectorate can grant its approval.
- Only after authorisation has been granted the employment contracts are drawn up with the children and their pay paid to their parents via payslips

The child's occasional involvement is limited to the type of event within the limits of the law, in suitable venues with a consistently playful atmosphere, preserving the child's integrity and image, in a context where the parents or those delegated to exercise parental authority are present.

5.1 Remedial measures for child labour

Anyone who directly observes a case of child labour or becomes aware of possible child labour within EXELITE SpA or at suppliers/subcontractors must immediately report this to the Social Performance Team. Reports can be made in accordance with the procedures set out in the system documentation, via the Parrot portal

Once the Social Performance Team has received the report, it initiates the process of investigating the facts and/or circumstances, with the assistance of the Human Resources Department and the company personnel responsible for overseeing the relevant business processes.

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Should a case of child labour be identified, or a situation falling within the definition of “child labour” as set out in the SA 8000 standard, the Social Performance Team, in collaboration with the Human Resources Department, shall take all necessary steps to ensure the immediate removal of the child from that situation.

Once the case of child labour has been resolved, the Social Performance Team, in collaboration with the Human Resources Department, is responsible for implementing the necessary remedial measures to ensure the child’s safety, health, education and development, as defined in the SA 8000 standard:

- immediately notify the relevant authorities
- draw up, in collaboration with the relevant legal authorities and the parents, a support plan for the child that provides for:
 - a) the provision of financial support for the child
 - b) the possibility for the child to return to school or ensure their continued education
 - c) where necessary, the payment of school fees, teaching materials, etc. to ensure the child’s continued education
 - d) appropriate arrangements to provide an alternative form of support for the family of the child, including, where necessary, by appointing a family member
 - e) measures to ensure continuous monitoring of the child’s situation and the effectiveness of the measures implemented.

In parallel with the actions described above, the Social Performance Team carries out a careful assessment of the causes that led to the identified instance of child labour.

The Social Performance Team promptly initiates a Corrective Action with the aim of planning and implementing the necessary interventions to resolve the non-compliance and prevent the emergence of further critical issues.

The Social Performance Team records the incident, the actions taken to resolve the critical conditions identified, the monitoring measures put in place, the Corrective Actions initiated, the outcomes of the interventions, and the closure of the critical situation.


The Social Performance Team also monitors the child’s situation and the outcome of the actions taken, with full details recorded on the appropriate forms.

Furthermore, data relating to reports are analysed by SPT during regular meetings aimed at reviewing the effectiveness of the procedures adopted in order to identify any potential improvements.

5.2 Measures to protect and support young workers

Should EXELITE SpA, within its organisation, identify the employment of young workers (excluding occasional employment contracted through fashion agencies), it undertakes to:

- to implement all necessary and appropriate measures to ensure conditions that safeguard the physical and mental health and development of young workers, including through the prevention of dangerous or potentially dangerous situations, in accordance with the SA 8000 Standard
- to plan and implement a career path capable of supporting the development of the young worker’s skills and abilities with a view to their enhancement

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Where young workers are subject to compulsory education, EXELITE SpA ensures, within its organisation, that working hours are arranged in such a way as to allow and facilitate the completion of their studies, in compliance with the SA 8000 Standard, which stipulates that:

- young workers may only work outside school hours
- Under no circumstances may young workers (who are no longer subject to compulsory schooling) work for more than 8 hours a day
- Under no circumstances, for minors still subject to compulsory schooling, may the total time spent by the young worker at school, at work and travelling exceed 10 hours a day

5.3 Training programmes

EXELITE SpA establishes partnerships with educational institutions to facilitate the placement of students in work experience and training placements designed to provide guidance and offer direct insight into the world of work within the company. This activity falls under the area of responsibility of the Human Resources Department, which defines the operational and organisational procedures, as well as the mechanisms for supervision and monitoring. These partnerships are governed in accordance with current regulations and are planned on the basis of a training programme drawn up by the educational institutions.

Under no circumstances does the training and work experience placement constitute an employment relationship.

5.4 Communication procedures

The SA8000 Standard states: "The organisation shall establish, document, maintain and effectively communicate to staff and other interested parties written policies and procedures to address child labour situations"

EXELITE SPA, in order to ensure effective communication of the contents of this procedure and its widest possible dissemination, ensures its publication on the website and the company portal

6. REFERENCES

National legislation, with particular reference to:

Law 977/67 Protection of the employment of children and adolescents and subsequent reform of Legislative Decree 345/99 Law 157/81 Minimum age for access to employment

Law 176/91 Art. 28: Right to education; Art. 32 Protection from economic exploitation and harmful activities Law 148/2000 Prohibition and immediate action for the elimination of the worst forms of child labour

Legislative Decree 345/99 Protection of young people at work

Legislative Decree 262/2000: supplementary and amending provisions to Legislative Decree 345/99 on the protection of young people in the workplace

Legislative Decree 77/2005 Defining general rules on work-study programmes, pursuant to Article 4 of Law 53/2003

Act 296/2007 Compulsory education for at least 10 years (6–10 years) with the school-leaving age raised from 15 to 16 work