



## CHILD / CHILD LABOUR PROCEDURE

**According to the Standard  
SA8000**

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### ***Revision management***

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**References SA8000 Standard**

|       |                                                                                                                                                                                                                                                                                                                                                                                           |
|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4.1   | Child Labor                                                                                                                                                                                                                                                                                                                                                                               |
| 4.1.1 | The organization must not resort to or support the use of child labor, as defined above.                                                                                                                                                                                                                                                                                                  |
| 4.1.2 | The organization must establish, document, maintain and effectively communicate to staff and other stakeholders written policies and procedures for remedying child labour situations, and must provide adequate financial and other support to enable the children involved to attend school and remain in school until they no longer meet the definition of a child.                   |
| 4.1.3 | The organisation may employ young workers, but where such young workers are subject to compulsory education, they must only work outside school hours. Under no circumstances should the total time spent between school, work and travel exceed 10 hours per day, and under no circumstances should young workers work more than 8 hours per day. They are not allowed to work at night. |
| 4.1.4 | The organization must not expose children or young workers to situations that are risky or harmful to their physical and mental health and development, both inside and outside the workplace.                                                                                                                                                                                            |

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## **1. Purpose**

Playsport Spa declares that it has not hired workers under the age of 16 and undertakes not to employ workers in this age group in the future, thanks to the implementation of this procedure that regulates the methods of hiring staff.

Playsport Spa promotes the education of children who fall under the ILO138 Convention (allows work as a minimum age in developed countries of 13 years for light work, 15 years for regular work, 18 years for risky work, minimum age in developing countries of 12 years for light work, 14 years for regular work, 18 years for risky jobs) and in ILO Recommendation 146 (aims to progressively raise the minimum age for admission to work to 16 years);

Any recruitment of Young Workers (aged between 16 and 18) at Playsport Spa will be carried out in full compliance with the current provisions of national regulations (Legislative Decree 262/2000 and Articles 1 and 8 co. 2 of Law no. 977/1967.) and the Company guarantees that no minor has been or will ever be exposed to risky situations, dangerous or harmful to health, both inside and outside the workplace.

The purpose of this procedure is to define the ways in which Playsport Spa guarantees not to use and not to encourage the use of child and child labour and manages the possible presence of young workers (apprentices, interns) at its premises in accordance with current legislation and also verifies their management at its suppliers.

In addition, this procedure establishes the line of conduct that will be adopted by Playsport Spa in the event that the presence of minor workers and the use of unfair and harmful practices towards these categories of individuals are detected among its suppliers and/or contractors.

## 2. Regulatory references

- SA8000 – Social Accountability 8000 (IV Social Responsibility Requirements, point 1. "child labour");
- 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;
- D.Lgs. 345 of 4 August 1999 (Implementation of Directive 94/33/EC on the protection of young people at work) and Legislative Decree no. 262 of 18 August 2000 (Supplementary and corrective provisions of Legislative Decree no. 345 of 4 August 1999 on the protection of young people at work, pursuant to Article 1, paragraph 4, of Law 24 April 1998, no. 128);
- Law no. 977 of 17 October 1967 (Protection of the work of children and adolescents);
- Article 10 Workers ' Statute L 300/70 (Student workers).
- Legislative Decree 04-08-1999 n.345 (integr. Legislative Decree no. 262/2000) Implementation of Directive 94/33/EEC on the protection of young people at work
- L.10-04-1981 n.157 Minimum age for employment
- L.19-07-1994 n. 451 Job training contracts
- Law no. 196 of 24-06-1997 Apprenticeship and training internships (Ministerial Decree no. 142/1998).
- Law 53/03 "Delegation to the Government for the definition of the general rules on education and the essential levels of services in the field of education and vocational training"
- Legislative Decree 59/04 "Definition of the general rules relating to kindergarten and the first cycle of education, pursuant to Article 1 of Law no. 53 of 28 March 2003".
- Legislative Decree 15/04/2005 n.77 "Definition of the general rules relating to school-work alternation"
- Ministerial Decree no. 195 of 3 November 2017 "Charter of rights and duties of students in school-work alternation".

### 3. Terms, definitions and acronyms

- **Child:** Any individual under the age of 16;
- **Child labour:** Any work performed by a child under the age(s) specified in the definition of a child, except as provided for in ILO Recommendation 146;
- **Personnel:** All individuals employed by an organization or with another type of contractual relationship, including but not limited to: directors, executives, managers, supervisors, office workers, laborers, and workers with any form of contract, such as security guards, cafeteria attendants, dormitory and housekeeping staff;
- **Worker:** All personnel without management responsibilities;
- **Remedial actions for child labour:** Any form of support and actions 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 ended;
- **Young Worker:** Any individual who exceeds the age of a child (16 years), as defined above, and who has not reached the age of 18;
- **Hiring:** drafting of a contract between worker and employer that regulates the activity, times and compensation.

#### **4. Liability**

The responsibility for ensuring complete compliance with and the adoption within the Company of the procedures against child and child labour, as defined by Playsport Spa, lies with the Management Manager for SA8000, in collaboration with the other company figures of the Social Performance Team (SPT), i.e. with the HR function.

## **5. Operating methods**

### **5.1. Policy for the protection of the Child and the Young Worker**

Playsport Spa, as a promoter of the values of responsibility and respect for its employees, refuses in any circumstance the hiring of new figures if they are categorized as Children, i.e. under the age of 16, except for marketing and product promotion activities (creation of multimedia material) managed in full compliance with the legal requirements in force in the legislative context of reference.

Currently, Playsport Spa does not intend to hire staff under the age of 18 (categorized as Young Worker) outside of educational initiatives and projects provided for by Italian legislation. Currently, the Company employs personnel categorized as Young Workers exclusively under the conditions relating to the School-Work Alternation (PCTO). Playsport Spa allows the Young Worker to work on site and guarantees that, under no circumstances, the total time spent between school, work and travel will be more than ten hours per day. In addition, the Company verifies and monitors that, under no circumstances, the working hours exceed eight hours per day and categorically excludes night work. It is the task of the SPT to monitor the situation of each Young Worker and ensure the reduced risk of the daily activities carried out by the employee and the compliance of work shifts with school hours. Specifically, the tasks that a Young Worker will be able to perform within the Company are:

- Modeling office and graphic office;
- Administrative or accounting activities;
- Sales Office.

Under no circumstances will Playsport Spa expose Children and Young Workers to situations that are risky or harmful to their physical and mental health and development, both inside and outside the workplace.

This policy for the protection of the Child and the Young Worker is extended to all collaborators and suppliers of the Company.

### **5.2. Procedure: Age verification at the time of intake**

With the desire to comply with the principles described above, Playsport Spa will take care of verifying the candidate's age before any hiring.

It will therefore be the task of the HR function, with the support of the SPT, to proceed with the assessment of the candidate's age through a careful analysis of personal data. In order to conduct this investigation, Playsport Spa will have the responsibility and burden of requesting a valid document from the candidate, including the identity card, driving license or passport. The Company, after having received and carefully checked all the documentation, will not process the original documents for any reason, but will keep a copy of the same as evidence of compliance with company rules and policies.

In the event that, as a result of internal controls within the Company (including by third parties) or reports from staff regarding cases of child labour or child labour that do not comply with company policies and this procedure, it is mandatory to immediately

communicate the situation to the Management Manager for SA8000. Subjects who become aware of a non-compliance in the field of child / child labor or exploitation of the labor of Young Workers, must proceed with a report on the SA8000, which can be either by name or anonymously.

Upon receipt of notice of a probable non-compliance with company policies and procedures regarding child / child labour within Playsport Spa, the Company will initiate a check of the report involving the interested parties. The Social Performance Team will have the task of analyzing the case by interviewing employees to allow all those involved to understand it. In the event of an actual irregularity, Playsport Spa will implement and implement specific remedial actions.

If the report concerns child/child labour practices or exploitation of Young Workers that do not comply with the SA8000 Standard at third-party suppliers or companies, please refer to chapter 5.4 of this procedure.

### **5.3. Remedial actions in case of child/child labour**

In the event of an actual irregularity, Playsport Spa will implement and implement specific remedial actions. In particular, the Company will immediately proceed with the reporting of the case by requesting the intervention of social workers and will start the procedures for terminating the contract. Subsequently, the Company will undertake to provide the subject (under 16 years of age) with financial support so that this allows him to attend school and stay there until he no longer falls within the definition of Child.

Each incident in which child/child labour practices are identified is documented and reviewed by the Social Performance Team with adequate and accurate records available relating to all cases of child/child labour. The case records will be properly kept.

### **5.4. Supplier management**

Playsport Spa is committed to establishing relationships with suppliers and third-party companies with the same principles of safeguarding the health and well-being of its employees.

In order to be able to establish working relationships with other companies, Playsport Spa makes use of requesting and keeping a written declaration in which the third party declares to comply with the policy and procedures against the exploitation of Children and Young Workers.

Specifically, Playsport Spa will send, on the occasion of the engagement of a new supplier with whom a relevant relationship is outlined, a special "Corporate Social Responsibility Suppliers Self-Assessment Questionnaire", which must be completed and returned to the company. The document will be provided in Italian for companies present in the national territory, while for suppliers located abroad, the document will be forwarded in English in order to proceed with the compilation. Once the completed questionnaire has been received, the company will analyze it to confirm or not the compliance by suppliers with the requirements set out in the Social Responsibility Management System implemented by Playsport Spa. In addition, the company makes use of the possibility of carrying out a check within its suppliers, through face-to-face audits, in order to verify the veracity of what has been declared.

In the event that situations relating to the exploitation of Children or Young Workers at a supplier or a third-party company are highlighted through the "Corporate Social Responsibility Supplier Self-Assessment Questionnaire" or during face-to-face audits, these will be the subject of particular in-depth analysis by the Management Manager for SA8000 with the support of the SPT. If the analysis confirms the reported situation, the company management will proceed to warn the top management of the partner company in writing asking for immediate corrections and realignment with the policy of Playsport Spa. Once communication of the realignment to the SA8000 standard has been received, a check will be carried out at the third party, in order to confirm or not compliance with the standard.

In the event of confirmation of non-conformity, Playsport Spa. in the first phase, it will warn the third-party company requesting alignment with the SA8000 standard no later than 60 days from the warning. If, following a second check, the situation is similar to the previous one, Playsport Spa will have to analyze the actions to be taken against the person involved. Depending on the seriousness of the non-compliance detected and not resolved, Playsport Spa may also make use of the possibility of terminating any employment relationship with the third party company.

All reports of any non-compliance with the policies and procedures implemented by Playsport Spa found at suppliers and third-party companies will be adequately documented.

### **5.5. How the policy and procedure are disseminated**

Playsport Spa is committed to disseminating the company's policy and procedures relating to child/child labour.

With the aim of disseminating the company's principles, Playsport Spa undertakes to post the Social Responsibility Management System policy on the company bulletin board with all the necessary references to consult this procedure on child / child labour.