

Child Labour Policy



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Child Labour Policy

Dulcop has always paid attention to ethical issues and is committed to both internal and supply chain controls. Child labor policy is a complex issue involving the protection of children's rights, the promotion of education and the prevention of exploitation. Effective policies must balance the need to ensure opportunities for young people and the need to protect them from dangerous or abusive working conditions.

Here are some key aspects:

1. **Legislation:** Many countries have laws prohibiting child labor in certain industries and setting age limits and working conditions for minors. It is critical that these laws are strictly enforced.
2. **Education:** Promoting access to education is crucial. When children have access to quality education, they are less likely to be forced to work.
3. **Support Programs:** It is helpful to implement economic support programs for struggling families so that they do not feel forced to make their children work.
4. **Awareness and outreach:** Awareness campaigns can help educate communities about the risks and consequences of child labor.
5. **International cooperation:** The fight against child labor requires globally coordinated efforts, particularly in developing countries.
6. **Monitoring and reporting:** It is important to have monitoring systems in place that document the working conditions of children and the effectiveness of policies implemented.

Child Labour Policy

This policy is intended to ensure that all suppliers involved in the supply chain or production of goods for Dulcop are aware and have a clear protocol on roles and responsibilities in the prevention, mitigation and resolution of child labor **(Child Labor protocol)**.

All definitions used in this document are based on internationally recognized standards.



Rights of Children's Convention

A child means any human being under the age of 18, unless under the law, the age of majority is reached earlier.

Child labor deprives children of their childhood, their potential and dignity and can be detrimental to their physical and mental development.



International Labour Organization (ILO CONVENTION)

The minimum age specified in accordance with paragraph 1 of this Article must not be less than the age of completion of compulsory schooling and, in any event, shall not be less than 15 years.

However the disposition of paragraph 3 of this Article, a Member whose economy and educational facilities are not sufficiently developed may initially specify a minimum age of 14, after consulting the employers 'and workers' organisations concerned, where they exist.

International Labour Organization (ILO CONVENTION)

Any Member who has specified a minimum age of 14 years in accordance with the provisions of the preceding paragraph shall include in its reports on the application of this Convention submitted pursuant to Article 22 of the Constitution of the International Labour Organization a declaration:

- a) that the reason for doing so still exists; or
- b) that waive the right to make use of the disposition from a certain date.

However the provisions of paragraph 1 of this Article, national laws or regulations or the competent authority may authorise employment or work from the age of 16, after consulting the employers and workers' organisations concerned, where they exist. It must be provided that health, safety and morals of the young people concerned are fully protected and that the young people have received appropriate specific education or vocational training in the relevant field of activity.

International Labour Organization (ILO CONVENTION)



For the purposes of this Convention, the term “**worst forms of child labor**” includes:

- a) all forms of slavery or slavery-like practices, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
- b) the use, engagement or offering of a child for prostitution, the production of pornographic materials or pornographic performances;
- c) the use, engagement or offering of a child for illicit activities, particularly drug production and trafficking, as defined in relevant international treaties;
- d) work which, by its nature or the circumstances under which it is carried out, is likely to harm the health, safety or morals of minors.

A person wearing a blue denim jacket is holding a white piece of paper with the word 'HELP' written on it in black marker. The person's hands are visible, and they are holding the paper up towards the camera. The background is slightly blurred, showing what appears to be a wooden surface.

International Labour Organization (ILO CONVENTION)

1. Each Member, taking into account the importance of education in the elimination of child labor, shall take effective and timely measures to:

- a) prevent the involvement of children in the worst forms of child labor;
- b) provide necessary and appropriate direct assistance to remove children from the worst forms of child labor and for their rehabilitation and social integration;
- c) ensure access to free basic education and, where possible and appropriate, vocational training for all children removed from the worst forms of child labor;
- d) identify and reach out to children at particular risk; and
- e) take into account the special situation of girls.



STOP CHILD LABOUR

International Labour Organization (ILO CONVENTION)

2. Each Member shall take all necessary measures to ensure the effective implementation and enforcement of the provisions giving effect to this Convention, including the provision and enforcement of criminal or, where appropriate, other sanctions.
3. Each Member shall designate the competent authority responsible for implementing the provisions giving effect to this Convention.



A close-up photograph of two hands holding a thick, braided rope. The rope is yellow and white, showing signs of wear and fraying. The hands are positioned on either side of the rope, with fingers wrapped around it. The background is blurred, showing a person's face and other hands, suggesting a group activity or a workshop setting.

International Labour Organization (ILO CONVENTION)

Members shall take appropriate measures to assist each other in implementing the provisions of this Convention through increased international cooperation and/or assistance, including support for social and economic development, poverty eradication programs, and universal education.

For the purposes of this Convention, where children between the ages of 15 and 18 engage in non-hazardous but forced or compulsory labor, extorted from a person under threat of punishment and for which that person has not volunteered or by such means as debt accumulation, withholding of documents or threat of reporting to immigration authorities, shall still be considered child labor.



International Labour Organization (ILO CONVENTION)

However, for the purposes of this Convention, the term **forced or compulsory labor** does not include:

- a) any work or service required under compulsory military service laws for work of a purely military character;
- b) any work or service that is part of the normal civic obligations of citizens of a fully selfgoverning country;
- c) any work or service required of any person as a result of a conviction in a court of law, provided that such work or service is performed under the supervision and control of a public authority and that such person is not hired or made available to private individuals, companies or associations
- d) any work or service required in cases of emergency, that is, in case of war or calamity or threat of calamity, such as fire, flood, famine, earthquake, violent epidemic or epizootic disease, invasion of animals, insects or plant pests, and, in general, any circumstance that may endanger the existence or welfare of all or part of the population;
- e) minor communal services of such a nature that, being performed by members of the community in the direct interest of the community, may therefore be considered normal civic obligations incumbent on the members of the community, provided that the members of the community or their direct representatives have the right to be consulted about the need for such services.

International Labour Organization (ILO CONVENTION)

According to Dulcop's Code of Conduct, all suppliers must actively share these requirements and disseminate them to all stakeholders involved. Dulcop supports its suppliers to implement this protocol and to mitigate and remediate to this practice.

Youth Workers

Youths between 15 and 18 years old if they are subjected to proper rules can work (and should be encouraged). This allows for formals even if they are lacking at the school level **BUT ONLY IF THERE ARE CIRCUMSTANCES THAT ALLOW IT. DULCOP IS COMMITTED TO NOT HIRING STAFF UNDER THE AGE OF 18.**

International Labour Organization (ILO CONVENTION)

Child	The International Labour Organization (ILO) Worst Forms of Child Labour Convention (No. 182) defines a child as all persons under the age of 18
Child labour	<p>ILO defines child labour as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Child labour refers to one or more of the following:</p> <ol style="list-style-type: none">1) Work done by a child who is under the minimum age of admission to employment for the type of work concerned;2) Work that interferes with compulsory education;3) Work that is likely to jeopardize a child's health, safety or morals, known as hazardous work;4) Other "worst forms of child labour" besides hazardous work.
Young worker	For the purposes of this guidance, "young worker" refers to a person who has reached the minimum legal working age, usually 15, but is under 18 years old (still a child).
Child labour remediation	Corrective measures taken to remove a child from child labour by providing alternatives and ensuring their safety and wellbeing.

Young Workers Management

Young workers under the age of 18 need special protection, but they are also valuable employees who form the basis of your company's future. You must have systems in place to ensure a non-discriminatory but protective workplace for young workers, where their occupational safety and health (OSH) is guaranteed. This includes the implementation of specific measures on bargaining, working hours, orientation, communication and ongoing OSH protection specifically targeting young workers. A system to identify hazards and assess risks is essential to create a safe working environment for young workers who have different characteristics:

- They breathe more and consume more air: they need more oxygen.
- They face physical risks if they have tasks that are beyond their physical characteristics.
- They need more rest than adults (12 hours): no night shifts, no overtime, do not interfere with school education.

Young Workers Management

The first day of youth workers must begin with training on company and employee conditions in terms of safety, contract, hours, and regulations. One must listen to suggestions from such figures and try to improve.

In addition, one must identify risks, protective measures and processes to reduce them also by making rounds in production and within the plant and talking to more experienced workers.



Young Workers Management

Risk Assessment

After identifying the risks, the degree of it, the probability (PROBABLY, POSSIBLY, IMPROBABLY) of its occurrence, and the harm it could cause (SEVERE, MODERATE, LIEVE) must be checked. Based on these requirements, the level of risk, low medium and high, is assessed. Young workers should not be assigned to tasks that have medium and high levels of risk. Tasks that have low risk must be analyzed so that they can be assigned to young workers and continuously evaluated as the process evolves and the health and safety of these workers must be monitored.

Young Workers Management

Risk Assessment

Level of risk	Actions and risk controls (for all workers)	Appropriate for young workers
High risk	<p>Remove young worker from the task/position immediately and initiate child labour remediation processes. Assess if the right safety precautions are in place:</p> <ul style="list-style-type: none">✓ Require detailed pre-planning and substantial safe work controls.✓ Enhanced risk controls will be required. Closely monitor progress & compliance.	<p>X</p> <p>Tasks and processes labelled as HIGH RISK should never be assigned to young workers.</p>
Medium risk	<p>Remove young worker from the task/position immediately and initiate child labour remediation processes. Documented safe work procedure to be used:</p> <ul style="list-style-type: none">✓ Detailed operational planning and controls.✓ Risk controls to be introduced before any work.✓ Workers should understand requirements and implement risk controls.	<p>X</p> <p>Tasks and processes labelled as MEDIUM RISK should never be assigned to young workers.</p>
Low risk	<p>Ensure the task and working environment are safe for young workers. Review current controls and, if they are inadequate, apply more effective measures:</p> <ul style="list-style-type: none">✓ Check local law (i.e., the national hazardous work list) industry regulations and existing in-house risk assessment reports to ensure position is not off-limits to young workers (see Annex VIII).✓ Review work/tasks and discuss the task with the young worker before they start working.	<p>✓</p> <p>Tasks and processes are likely suitable for young workers.</p>

Young Workers Management

How to behave?

Dulcop, to make sure that everyone is informed about the occurrence of this condition, has developed several steps in line with the Ilo Convention to guide its employees and suppliers in case one is faced with or suspected of a case of child labor.

► 1. Child labour prevention



Clearly state the **minimum ages** for general work and hazardous work in your hiring policy and job announcements.

See
section
2.1



Hiring procedures and processes must include a **robust age verification mechanism**, which includes checking ID documents and in-person interviews.

See
section
2.2



Medical examinations are **not an appropriate means** of verifying age



Risks linked to **increases in demand, recruitment agencies, subcontractors and service providers** must be managed.

See
section
2.2

Young Workers Management

How to behave?

First:

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1. Clear conditions of **minimum age and hazardous work (ex: to work in Dulcop is required as minimum age 18 years)** and **verification of incoming documents during the selection process. Avoid clinical examinations and verify employment agencies.**

Dulcop does not hire staff under the age of 18, and the entire document verification process comes through the consulting firm we use with document verification (ID card and social security number). The same process is done for the employment agencies used.



Young Workers Management

How to behave?



In case someone has suspicion or the fact occurs one must:

- 1.** If a child or youth is found in child labor conditions, immediately seek a solution with the person in charge to do the best for the child, remove and secure the child, and call, if possible, immediately the parents or supervisors, authorities and relevant associations.
- 2.** If a young worker under the age of 18 is found doing dangerous work you must:
 - Reallocate him without lowering his salary.
 - Check his physical condition and treat him if necessary.
 - Do training.
 - Monitor the situation so that he does not return to dangerous activities.

Young Workers Management

How to behave?



3. If a child under the minimum age is found in production plant then one must:

- Talk to him/her to understand information and offer cooperation.
- Activate safety measures and remove the child immediately to take him/her to a safe place.
- Contact parents or supervisors.
- Verify that he/she has been paid for the work done.
- Provide with a financial sum to help him and his family all the way to school and in case he is admitted hire him for nonhazardous work.
- Keep track of all cases of child labor.
- If an expert is involved explain the situation to him through the CHILD LABOUR NOTIFICATION Form and support him to solve the problem.
- If there is no expert then seek support from ILO and UNICEF Agencies.

Young Workers Management

How to behave?

3.1. If a child under the minimum age is found in production plant during an audit then one must:

- Fill out the CHILD LABOUR NOTIFICATION form: interviews will then be conducted to find out what the situation is like
- Find a remedial program that includes training and education

3.2. If a child under the minimum age is found in manufacturing plant **THAT IS NOT WORKING** then one must:

- Talk to parents and explain why he/she cannot be at the company
- Contact parents if not present
- Move him away and secure him
- Understand if parents or supervisor need assistance
- If there is a place for example daycare or children's room put him there otherwise have parents contact a daycare center
- Keep track of paperwork



Young Workers Management

How to behave?

All suppliers and related manufacturers must implement their own protocol on child labor and ensure that they are all informed. Dulcop supports suppliers with required documentation and explanations in case they are required and provides its policy in the preferred language as requested.

► 3. Child labour remediation (after identifying child labour)

If a child or young worker is found to be in child labour, seek together with your buyers, and ideally an expert organization, solutions that are **in the best interests of the child or young worker concerned**.



When a young worker (above the minimum working age but under 18) is engaged in **hazardous work**, the following actions should be taken:

1. Job re-allocation
2. Health check
3. Training for the young worker



See
section
4.1

When a child **below the minimum age** for work is found at the production facility, the following actions should be taken:

1. Immediate actions, including taking the child to a safe place
2. Providing a living stipend
3. Enrolling him/her in a suitable educational/vocational



See
section
4.2



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Thank you