

PROCEDURE

SA8000

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1 Purpose

This procedure ensures that the activities carried out by M.E.P. Macchine Elettroniche Piegatrici S.p.A. (henceforth MEP) take place in full compliance with the requirements of the SA8000 standard, in particular concerning:

- ✓ Child labour management;
- ✓ Forced labour
- ✓ Safety at work
- ✓ Freedom of association
- ✓ Fighting discrimination
- ✓ Communication activities towards the company's Stakeholders;
- ✓ Workers' Representative for Social Responsibility / Social Performance Team.

2 Applicability

This procedure applies to the activities required by the SA8000 standard.

3 References

Regulations	SA8000:20014
Regulations	CCNL [National Collective Bargaining Agreement] "Metalworkers"
Regulations	RU Manual
Regulations	Legislative Decree no. 81/2008, as subsequently amended and supplemented
Regulations	Legislative Decree no. 152/2006, as subsequently amended and supplemented
Regulations	UNI EN ISO 14001:2015
System documents	Integrated Quality and Environment Manual
Procedures	PG_20 <i>Procedure for the management of Occupational Safety</i> Code of Ethics FL_010 <i>Education and training of personnel</i> Ref. Integrated System procedures
Operating Instructions	IO_029 <i>Analysis of SA8000 risks</i>
Forms	MD_038 <i>Improvement actions</i> MD_053 <i>Risk Analysis</i> MD_054 <i>SA8000 reports suggestions complaints</i>

4 Responsibility

The responsibility for the content of this procedure and the proper implementation of the described activities lies with the Integrated Management Systems Manager (hereinafter also RSGI) and the Human Resources Office (hereinafter also RU) for the operational part.

5 Operational control

The content of the following table summarises the documented procedures required by the reference standard, contained within this procedure. For all other activities, reference is made to the documented procedures of the management system, as well as the practices in use at the company.

<p>§0 Child labour management¹</p>	<p>Child labour management is governed by international regulations such as:</p> <ul style="list-style-type: none"> - ILO Conv. 138 (International Labour Organisation) Minimum Age and Recommendation; - ILO Conv. 182 Worst forms of child labour; - UN Convention on Child Rights. <p>At national level, the management of child labour is governed by Legislative Decree 81/08 Safety Consolidation Act (Articles 183, 190, 202), Legislative Decrees 345/99 and 262/00 on the protection of minors in the workplace.</p>
<p>§5.2 Forced labour</p>	<p>MEP strongly discourages any form, even indirect, of forced and compulsory labour</p>
<p>§5.3 Safety at work</p>	<p>MEP guarantees a safe and healthy working environment in compliance with the applicable legislation in force</p>
<p>§5.4 Freedom of association</p>	<p>MEP guarantees its workers maximum freedom of membership in all trade union organisations</p>
<p>§5.5 Fighting discrimination</p>	<p>No form of discrimination is tolerated at MEP</p>
<p>§5.9.2 Workers' Representative for Social Responsibility</p>	<p>The workers must elect their own Representative for Social Responsibility; the manner in which this election is carried out and the tasks assigned to this figure are set out in §5.9.2. The elected representative is a member of the Social Performance Team, which operates in accordance with §9.2 of the SA8000 standard.</p>
<p>§5.9.6 Complaint management</p>	<p>There is a written complaints procedure that is confidential, impartial, non-retaliatory, accessible and available to staff and interested parties to make comments, recommendations, reports or complaints regarding the workplace and/or non-compliance with the SA8000 Standard.</p>
<p>§5.9.7 Stakeholder communication activities</p>	<p>The identification of and communication to all stakeholders of the organisation is made explicit in §5.9.7.</p>
<p>Audits of the Certification Body</p>	<p>MEP is committed to compliance with the regulations issued by the Certification Body, in particular with regard to the acceptance of unannounced audits.</p>

¹ **child:** a child who has not yet reached the age of 15 or who is still subject to compulsory schooling (up to the age of 16);
adolescent: a child between 15 and 18 years of age who is no longer subject to compulsory schooling;
Child labour: continuous or occasional work activity carried out in a non-family environment by a person under the age of 15 or compulsory school age (16).

5.1 Child labour management

The age of all workers is verified by the Human Resources RU office during the interview and at the time of recruitment, also by requesting a document in cases of doubt; RU files (in compliance with current privacy legislation) a copy of workers' identity documents.

At the same time, it also verifies the fulfilment of compulsory schooling by requesting the appropriate documentary evidence from school administration offices. This procedure ensures that there are no children, young workers who have not completed compulsory education at the time of recruitment, or young workers, in general.

Young workers may be employed for the pursuit of an occupation but, as stipulated in ILO Conventions 138 and 182, they may not be employed in work that may compromise their health, safety or morality by its very nature or by the conditions under which such work is carried out.

The organisation does not normally use workers under the age of 18.

If this is necessary (e.g. in the case of internships), a series of measures must be put in place to ensure that the minor can perform the assigned task in full health and safety.

Specifically, MEP, before assigning minors to work and on the occasion of any relevant changes in working conditions, carries out the planned risk assessment with particular regard to:

- a) incomplete development, lack of experience and awareness of existing or possible age-related work hazards;
- b) equipment and arrangement of the workplace and workstation;
- c) nature, degree and duration of exposure to chemical, biological and physical agents;
- d) manual handling of loads;
- e) arrangement, selection, use and handling of work equipment, specifically agents, machines, apparatuses and tools;
- f) planning of work processes and work performance and their interaction with the overall work organisation;
- g) training and information situation of minors.

The information on the risk assessment, documented in a special report, must also be given to the minor's parents, who must be informed in writing of the minor's fitness or temporary or total unfitness for work. In addition,

- minors must be guaranteed a weekly rest period of at least two days, consecutive if possible, including Sunday;
- an internal tutor must be designated to ensure the training of the minor worker in the correct performance of the assigned tasks, as well as in the correct use of equipment and devices;
- it is prohibited to employ adolescents in the work, processes and jobs² listed in Annex I of Legislative Decree 345/99 (and partially amended by Legislative Decree 262/00).

² See [Annex I](#)

5.1.1 Child labour remedy procedure

1 PURPOSE

The purpose of this procedure is to define the steps the company intends to take if it becomes aware of the use of child labour in activities over which it can exert influence.

2 SCOPE OF APPLICATION

The modalities of intervention set out below are applicable to the activities carried out directly by MEP or, in relation to the influence that MEP can exert, to the activities carried out by the Suppliers, operating in compliance with the laws in force on the subject and in any case under the most favourable conditions for the parties concerned.

3 DESCRIPTION OF THE ACTIVITIES

MEP undertakes to respect and disseminate to both internal and external stakeholders its commitment not to use child labour and to promote all actions aimed at developing a culture of protection of young workers at work.

In particular, it undertakes to:

- Only hire people who have reached the age of 16 (the age after compulsory schooling in Italy);
- Comply with collective bargaining agreements and all regulations on the employment of minors and young people in companies;
- Comply with regulations protecting the needs of working students;
- Activate forms of collaboration with schools/universities, Trade Associations to promote training courses (in-company internships) aimed at facilitating the insertion of young people into the world of work;
- Promote forms of collaboration with non-governmental organisations to support child protection policies.
- Not expose children or young workers to situations that are risky and harmful to their physical and mental health and development, either inside or outside the workplace (e.g. work related to weapons production, pornography, etc.).

These principles are disseminated in the following way:

- All suppliers are required to adhere to ethical principles, including the obligation not to employ minors and to protect young workers
- Training is provided to staff on this topic
- This procedure is made available to all other interested parties upon request

If MEP becomes aware of child labour, it will act in accordance with the following minor remedy programme.

3.1 Age verification during recruitment

During the selection of a new candidate by a company/recruitment agency, the Human Resources Manager specifies to the appointee the attainment of 16 years of age as a mandatory and indispensable requirement for possible future employment.

After selection, during the recruitment phase, RU verifies the veracity of the personal data, requesting a copy of the identity documents, residence permit (in the case of non-EU citizens), tax code and those required by the CCNL.

3.2 Procedure for monitoring child labour compliance at MEP and suppliers

MEP guarantees compliance with this procedure through:

- Internal audits planned annually and carried out by SPT members or external consultants to detect any non-compliance with the social responsibility system;
- Training of personnel who can report any anomalies / non-compliances in the system;

- Implementation of the procedure on anonymous reports / suggestions by staff;
- Unannounced audits carried out by SPT members qualified to perform audits of the company's suppliers on the basis of a sampling plan defined annually to ascertain compliance with the procedure in person;
- Compliance with the provisions of Legislative Decree no. 81/08 and Law of 17 October 1967 no. 977.

3.3 Remedial actions

In the (albeit remote) event that minors under the age of 16 are found to be employed, the company management, in cooperation with the SPT, undertakes to implement a series of remedial actions aimed at protecting the minor and his or her family.

Upon receiving a report of a minor being found at work, the SPT works in cooperation with the Telefono Azzurro [ChildLine] association, contacting it immediately on the number 114 Emergenza Infanzia [Child Emergency] (free of charge 24 hours a day). The association's intervention includes an initial assessment over the phone of the seriousness of reports of child labour.

If a case of child labour exploitation by MEP is detected, the competent territorial law enforcement agencies, the local Provincial Labour Directorate and, in some cases, also the General Labour Department at the Ministry of Labour are activated. When cases of serious exploitation are also involved, the Social Services and the appropriate territorial agencies are also activated, in order to set up a customised pathway for the effective recovery of the child.

The identified remedial plan must guarantee in particular and also as an alternative:

- A form of livelihood for the minor and his/her family for not working by providing an alternative income for the household
- Ensuring that the minor can complete his or her compulsory education by contributing to the payment of school fees, books, transport to school;
- Seeking to employ or, alternatively, supporting a family member of the minor in finding employment.

The SPT undertakes to identify the best ways to implement the remedial project with the Company's Management.

3.4 Monitoring of suppliers

At the qualification stage, MEP's suppliers sign a commitment to comply with the ethical principles and combat child labour by signing an SA8000 "Adherence to Principles of Social Responsibility" form.

Should the supplier refuse to enter into such an undertaking, the supplier's qualification process is suspended until the situation is remedied. In some cases it may be necessary to communicate this situation directly to the customers.

If, on the other hand, workers under 16 years of age are identified during surprise or planned audits at suppliers, the SPT, after consulting the Management, suspends the supplier's qualification and takes action by contacting the 114 number of Telefono Azzurro or the NGOs operating on site, taking steps to ensure that the supplier takes remedial action as defined above in §3.3.

All remedial actions carried out must be recorded regularly; the records must be kept and the progress must be duly monitored. An appropriate Corrective Action will be opened in the Social Responsibility System.

If the supplier does not co-operate in finding a resolution, it is removed from the qualified supplier list.

5.1.2 Remedial procedure for young workers, without completion of compulsory schooling

In the event that MEP employs a young worker between the ages of 16 and 18, it undertakes to include him/her in a vocational training programme and to ensure compliance with safety regulations in order to prevent him/her from being exposed to situations that are dangerous, hazardous or harmful for his/her health, both inside and outside the workplace.

If MEP, as a result of internal inspections (audits), or through any other source of information, learns of the employment of young workers (underage workers aged 16 or over) who have not completed their compulsory education, the RSGI opens a non-compliance (as indicated in the relevant procedure) and proceeds to immediately notify the Company Management and RU.

The remedial actions envisaged in the case of employing a young worker who has not completed compulsory education are as follows:

- The RSGI shall, within six months, take action with the competent bodies in order to enable enrolment and attendance at recognised educational establishments and to facilitate obtaining that diploma.
- Hiring a family member of the minor at MEP.
- Provide support for the minor, including financial support, so that he/she is able to attend at least compulsory school (10 years).
- Monitor school attendance with the involvement of parents (if any) and social workers (if any). Ensure that the child continues to attend school regularly, by undertaking to pay all necessary expenses (e.g. fees, purchase of books and other expenses) for school attendance. Involve social workers, voluntary associations, etc., who can assist in monitoring the situation of the child and his/her family context.

The remedial action to be taken, among those listed or all those listed, is decided according to the specific situation.

If, on the other hand, workers over the age of 16 who have not completed compulsory schooling are identified during surprise or planned audits at suppliers, the SPT requests that the Management immediately suspend relations with the supplier/sub-supplier with suspension of payments, until the implementation/conclusion of the remedial actions referred to in the previous paragraph.

DIR GEN, RSGI, the SA8000 Workers' Representative, the supplier/sub-supplier, the child's parents and, if involved, also representatives of local authorities, bodies or institutions take part in deciding the resolutions to be taken.

The remedial action agreed with the supplier/sub-supplier constitutes corrective action of the detected non-compliance.

The RSGI is in charge of monitoring the implementation and conclusion of the decided remedial action.

5.2 Forced labour

MEP does not resort to or support the use of forced or compulsory labour.

The RU office does not retain original identity documents and does not require staff to pay “deposits” at the start of employment.

At MEP, all overtime is voluntary; no forms of coercion, threats or sanctions are used to force workers to work overtime. RU monitors data on the amount of overtime.

Overtime is always voluntary and any requests for peak demand are handled as per the CCNL.

All MEP personnel have the right to leave the workplace at the end of the standard working day and are free to terminate their employment by giving the employer the notice required by the CCNL.

While working in an office, workshop or construction site, there are no unreasonable restrictions on the freedom of movement of staff, including movement to the canteen, movement during breaks, including toilet breaks, movement to access water, necessary medical care or areas for religious practices.

The safety measures applied by MEP do not intimidate workers or unjustifiably restrict their movement, as systematically verified by the RSGI and RSPP [Health and Safety Officer]

The RU office monitors to make sure that the working conditions laid down at the time of recruitment correspond to those applied later during employment.

RU monitors to make sure that personnel are free from any form of pressure, coercion or threats that could in any way coerce them to accept a job or retain employment.

MEP, through the RU department, verifies on a random basis and through interviews, that labour agencies do not withhold any part of wages, compensation allowances, property or documents from staff, in order to force them to continue working for the organisation.

RU collects relevant information concerning temporary work:

- control of absence of deposits by workers,
- periodic sampling of pay slips,
- verification of the application of minimum rates in the company labour contract

5.3 Safety at work

For this issue, reference is made to PG 20 *Procedure for the Management of Safety at Work*.

5.4 Freedom of association

All MEP personnel have the right to form, join, and organise trade unions of their choice, and to bargain collectively with the organisation, as provided for in the applicable National Collective Bargaining Agreement (CCNL), the Workers' Statute, and relevant legislation.

MEP, for its part, informs staff that they may freely join any workers' organisation of their choice, without any negative consequences or retaliation by the organisation.

Furthermore, MEP does not interfere in any way in the formation, operation or management of the aforementioned workers' organisations or in the collective bargaining process.

Workers' elections are independent and freely managed by the workers; their participation in this process is voluntary

RU monitors to make sure that union members, workers' representatives and personnel engaged in organising workers are not subject to discrimination, harassment, intimidation or retaliation for being union members, or workers' representatives, or being engaged in organising workers, and must ensure that such representatives can have contact with their members in the workplace.

The workers can meet their representatives at an agreed time and place

5.5 Fighting discrimination

The company does not engage in or support discrimination in hiring, remuneration, access to training, promotion, dismissal or early retirement based on race, class, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age.

The company does not interfere with the exercise of personnel's right to follow principles or practices, or to meet needs related to race, class, national origin, religion, disability, gender, sexual orientation, union membership or political affiliation.

The company does not permit conduct, including gestures, language or physical contact, that is sexually coercive, threatening, abusive or exploitative.

The company ensures that staff representatives are not subject to discrimination and that these representatives can communicate with their employees in the workplace.

Operationally, reference is made to the following procedures:

- FL_010_Education and training of personnel
- RU Manual "MEPeople"
- Code of ethics

5.6 Disciplinary measures

MEP applies the CCNL, the Workers' Statute and the regulations on disciplinary measures, both with regard to the disciplinary procedure and the relevant sanctions.

5.7 Working hours

The working hours are governed by the CCNL and the RU Manual "*MEPeople*" to which reference is made.

RU manages and verifies the hours worked by employees through computer programs, also using badge reader readings.

The holiday and leave/reduced working hours status of all employees is kept under control using electronic programs.

On a quarterly basis, the SPT analyses the holiday report and submits the findings to the Management for decision-making.

In cases of Non-Compliance with national legislation and/or the applicable CCNL, the Management (aware of the sanctions it would face), takes the necessary measures and communicates directly with the employees involved.

5.8 Remuneration

The remuneration of each worker is determined in accordance with the minimum rates of pay and the provisions of the CCNL.

Pay slips, processed at the end of the work month, are sent to the workers in electronic format by e-mail with a personal password-protected attachment.

Following the processing of pay slips, bank transfers are made to the personal current accounts indicated and held by the employees, by the 12th day of the following month, or the next day if a public holiday or a day before a public holiday.

In the event of enquiries from employees, RU is available to clarify the details contained in pay slips.

5.9 Document system

5.9.1 Policy

The policy, applied at all levels of the organisation, identifies the principles on which the organisation's commitment to improvement and that of its Social Responsibility activities is based. This policy is communicated and disseminated to all personnel, through the company network system and by posting on special notice boards, and to all interested parties by publication on the company website.

The Corporate Integrated Quality System ensures that the company's management system is established, applied and improved in accordance with the adopted reference standards for Quality (ISO 9001), the Environment (ISO 14001), Technical Standards (ISO 3834) and Social Responsibility (SA 8000).

With regard to the integration of the various Management Systems, please refer to the published department organisation chart.

5.9.2 Social Performance Team

a. Election of the RLSA 8000 representative

Worker representation in the Social Performance Team (SPT) must be assumed by one or more members of the RSU [Unitary workplace union structure], if the RSU is constituted and chooses to fulfil this role.

In cases where the RSU does not designate a representative, workers may freely elect one or more SA8000 representatives (RLSA) from among themselves. Under no circumstances should the SA8000 Workers' Representative be seen as a substitute for trade union representation

The election of the SA8000 Workers' Representative is up to the workers in the number of one representative for every 150 employees in force, who periodically choose their own Workers' Representatives for Social Responsibility, who are representative figures to whom all workers can turn to report any anomalies or problems concerning the application of the requirements of the SA8000 standard.

The role of the SA8000 Workers' Representative is to ensure that the report raised by the worker reaches Management, so that it can assess whether and how to take corrective action. The SA8000 Workers' Representative also has the task of informing the workers concerned of the actions taken. In short, he or she is the reference figure who will enable effective communication between operators and Management with a view to the continuous improvement of working conditions.

The organisation ensures that personnel choose their own representative to facilitate relations with Management on matters relating to SA 8000 requirements.

b. Method of Election

All employees can apply for the role of RLSA Workers' Representative by communicating their willingness to stand as candidate to their colleagues during a meeting. Once the RSGI has received the nominations, he/she proceeds to call for the election of the SA8000 Workers' Representative, which can also take place by a show of hands.

Any ballots (if voting is by that method) are collected in a ballot box and counted by a committee of at least three members (two chosen from among the workers), with the RSGI as chairman.

c. Appointment of the RLSA Workers' Representative

Once the ballots have been counted, the RSGI draws up a record of the result of the vote and announces the elected Representative, proceeding to appoint him/her with an *SPT Letter of Assignment*. The Representative must formally accept the appointment and remains in office until resignation or possible re-election.

In order to participate in the activities of the SPT, the members must be adequately trained through one of the following methods:

- external consultant
- internal training by the RSGI
- shadowing a previous member
- course by a Certification Body

At the end of this phase, the RSGI sends notification to all staff members of the elected appointee. All documentation pertaining to the election (Voting Cards) is kept by the RSGI for a period of at least 5 years.

d. Functioning of the SPT

The Social Performance Team (SPT) consists of:

- RSPP [Health and Safety Officer] - Company Representative
- RU Office - Company Representative
- 2 x SA8000 Workers' Representatives
- RSGI - System administrator

The meeting of the SPT is convened by the RSGI on the following occasions:

- Meeting for the annual system review;
- Extraordinary meeting to update the system review;
- Accident review;
- SA8000 Non-Compliance review;
- Regular **six-monthly** review of Corrective and Preventive Actions list.

The SPT periodically carries out a risk reassessment to identify and prioritise areas of actual or potential non-compliance with the Standard.

The SPT proposes actions to the Management to address the risks identified. These actions should be prioritised according to the severity of the risks or the fact that a delay could make it impossible to solve the problem.

The SPT must conduct these assessments based on the information in its possession and that obtained through data collection techniques and consultation with stakeholders. If necessary, the SPT convokes other employees or collaborators depending on the topics/issues to be analysed.

The activity is documented in MD_053 *SA8000 RISK analysis*, which, due to its structure, serves as a guideline for carrying out the activity.

The meetings of the SPT are reported in minutes by the RSGI and signed by the participants.

5.9.3 Risk assessment

For the SA8000 risk assessment, please refer to Operational Instruction IO_029 *SA8000 Risk Analysis*.

The findings are documented in MD_053 *SA8000 RISK Analysis*

5.9.4 SPT monitoring

The SPT checks:

- ✓ compliance with the Standard;
- ✓ the implementation of actions planned to address the risks identified by the SPT;
- ✓ the effectiveness of the methods adopted to meet the organisation's policies and the requirements of the Standard.

The Management mandates the SPT to collect information from or to involve stakeholders in the monitoring activities.

The SPT also works with other areas of the organisation to examine, define, analyse and/or resolve any possible non-compliance with the SA8000 Standard.

The SPT organises annual internal audits and prepares reports for Management on the performance and benefits of actions taken to meet the requirements of the SA8000 Standard.

5.9.5 Internal engagement and communication

For internal communication activities, please refer to the Integrated Manual §7.4

The notice boards host copies of the SA8000 Standard and of the Performance Indicators Annex, making them available to all workers.

The SGI participates in drawing up training programmes, including SA8000.

5.9.6 Complaints procedure

All workers may lodge complaints in the following ways:

- Internal e-mail SA8000@mepgroup.com
- Whistleblowing procedure available at the bottom of the page under the “Legal & compliance” link on the institutional website <https://www.mepgroup.com/>
- *MD_054_SA8000_reports_ideas_complaints* report cards to be posted in the special suggestions/complaint boxes located near the time clocks dedicated to recording attendance located in the production areas of Building A and Building B; these cards can be found in paper form near the boxes or on the website <https://www.mepgroup.com/> at the bottom of the page under the link “Legal & compliance”. They also contain references to the external Bodies that workers can turn to in case of need
- Contact details Certification body Bureau Veritas S.p.A. Via Monza 347 – 20126 Milano (MI) Telephone: (+39) 02 270911 e-mail csr@it.bureauveritas.com
- Accreditation Body for SA8000:
Social Accountability International 9 East 37th Street; 10th Floor New York, NY 10016 United States of America
Email: info@sa-intl.org Phone: +1 (212) 684-1414
<https://sa-intl.org/saas-online-complaints-submission-form/>
- In the case of complaints received anonymously. The SPT considers the advisability of giving a public response to the report by posting it on the notice board.

The RSGI and/or the SA8000 Workers’ Representative evaluate the report and bring the findings to the SPT agenda.

The SPT decides whether to take corrective action and, if necessary, to update the risk assessment.

5.9.7 External audit and stakeholder involvement

Identification of Stakeholders

The stakeholders with whom the organisation interacts in carrying out its activities have been identified in these macro-categories:

- shareholders and employees;
- customers;
- suppliers;
- institutions and social partners (trade organisations, industrial associations, most representative trade unions, local public bodies, etc.);
- social groups and associations (e.g. sports associations, NGOs, etc.).

The organisation has identified, for each of these categories, which are the main stakeholders by listing them in the *Stakeholder List*

Communication towards Stakeholders

There are multiple modes of communication (internal and external), distinguishing between different communication aspects, such as:

- the institutional sphere;
- the operational field.

In the institutional sphere, communications, which take place through publication on the company's website or through information campaigns in the media, concern:

- Company policy;
- Management Review;

In the operational field, the communications concern:

- Service features;
- Amendments or new laws and regulations;
- Information on risk assessment and control;
- Stakeholder needs/requirements;
- Organisational arrangements (e.g. how to elect the SA8000 Workers' Representative).

The dissemination of the indicated data takes place in the manner specified within the *Stakeholder List* form where, for each name, the manner of communication is indicated. The leaflets *SA8000 Customer Information* and *SA8000 SUPPLIERS Information* are also distributed

Stakeholder communications take the form of:

- free reports, which are recorded in the non-compliance report form, if they concern operational aspects or those relating to the Integrated Management System (ref. *MD_054_SA8000_reports_suggestions_complaints*). The RSGI must immediately verify the legitimacy of such report and, if the complaint/report is significant, he/she contacts Management to agree on a resolution of the problem. In the event that the complaint proves to be unfounded, the RSGI shall ensure that the Complainant is notified of the failure to take the matter up.
- "Contact" section of the MEP website
- Annual contacts by the RSGI or other involved Bodies on SA8000 issues and performance

For each activated project, the modalities of engagement of the pertinent external stakeholders are defined.

5.9.8 Corrective and preventive actions

Reference is made to procedure PG_03 *Management of Corrective and Preventive Actions*

The SPT directly follows the evolution and closure of those related to SA8000 issues.

5.9.9 Training

Safety Training:

MEP ensures that each worker receives sufficient and adequate training on the specific risks as required by the applicable regulations.

The training and, where foreseen, the specific instruction must take place:

- 1) upon establishment of the employment relationship or of the beginning of the employment in the case of labour supply;
- 2) upon secondment or change in duties;
- 3) upon the introduction of new work equipment or new technologies, new hazardous substances and mixtures;
- 4) when the RSPP evaluates additional training beyond the statutory training, including for workers already trained in previous work experience.

Training is carried out by an experienced person and at the workplace.

Safety at Work training must be repeated periodically in relation to the evolution of risks or the emergence of new risks.

Training and/or instruction is also provided in the event of an employee's injury, with consideration being given to extending it to all workers involved in the same task.

"On the job" training:

This is job-related training by the area/department manager (Supervisor), on induction and/or change in duties

SA8000 training:

a. It is the RSGL's task to manage the training of the entire workforce on issues of social responsibility. He/she has the task of identifying and proposing to the Management the most appropriate resources for the purpose. These can be found both inside and outside the company.

b. In the first case, personnel training is delegated to internal figures, capable of ensuring that the employees entrusted thereto receive adequate training on the theoretical contents of the company's SA8000 system, on the reference regulations and on the application of what is documented in the performance of company activities. In the second case, staff training will follow attendance at courses, seminars, refresher sessions, held by lecturers from outside the company.

Typical topics are:

- ✓ Training on the basic concepts of Corporate Social Responsibility at Work (SA8000) by the RSGL, also with the support of a qualified consultant; the *SA8000 Employee Information* form and applicable procedures are explained; each worker must have the following information, as a minimum:
- ✓ SA8000 principles
- complaints procedure (suggestions and complaint box, whistleblowing, internal email SA8000@mepgroup.com certification body email csr@it.bureauveritas.com)
- ✓ existence of the SPT and names of the RLSA8000 Workers' Representatives (with contact details)

Regulatory Training:

The RU Office draws up and distributes a collection of rules to be followed with reference to:

- a. behavioural norms and recognition techniques within the company, working time and its discipline
- b. recruitment and selection
- c. regulations and procedure concerning disciplinary measures
- d. overtime, extra work and services exceeding the working hours
- e. legislation and procedure on time off work
- f. human resource evaluation procedures and regulations.

The members of the Supervisory Body provide specific training for the MOG [Organisation, Management and Control Model] pursuant to Legislative Decree 231/01

5.9.10 Suppliers

Subcontracting and procurement

Annually, the SPT, in cooperation with RU/UACQ, assesses the significant risks of non-compliance by suppliers/subcontractors, private employment agencies and sub-suppliers.

As a result of this activity there is form *MD_053_Risk Analysis*, which also reports the significant risks of non-compliance by suppliers/subcontractors, private employment agencies and sub-suppliers.

Relationship with temporary employment agencies

RU maintains a list of private temporary employment agencies with which MEP works. This list includes the office address of the private employment agency and information on each sub-agency used.

RU draws up a contract with each private temporary employment agency used, including clearly defined performance indicators (e.g. 100% of workers must be graded in accordance with Italian law, etc.).

The following elements are specified in contracts with private temporary employment agencies:

- Private employment agencies operate with a valid business licence/authorisation in accordance with local law (including private employment agencies operating in the worker's country of residence);
- No expenses or costs for recruitment are borne in whole or in part by the workers;
- Prior to employment (including, if applicable, before leaving their country/region of origin) workers are informed of the basic terms and conditions of employment, either verbally or in writing, through a letter of employment in their local language as required by law.

In the event that MEP becomes aware that workers have incurred expenses or costs in whole or in part, MEP undertakes to reimburse the expenses incurred and to claim them back from the agency.

Monitoring criteria applied for temporary employment agencies:

Audit on the following documents:

1. pay slips,
2. employment contracts,
3. authorisations/qualifications

Frequency of controls:

- o quarterly, RU requests sample documents from each Employment Agency, for points 1. and 2. The workers subject to the audit must vary in each survey from the previous one.
- o annually, RU requests copies of the documents from each Employment Agency, for item 3.
- o sample interviews by the RSGI with agency workers, which are conducted confidentially and whose findings are discussed in confidence at the SPT meeting.

Monitoring criteria applied for suppliers

MEP draws up an audit plan to verify the degree of implementation of SA8000 requirements by its suppliers.

The following are required during the audit:

- Analysis of all points of the SA8000 standard
- Specific data to develop performance monitoring indicators and to ensure that suppliers/subcontractors, private employment agencies and sub-suppliers are adequately addressing the significant risks identified
- Chamber of commerce business register file search
- List of supplier personnel who can come to the company
- Certification of technical/professional requirements
- Third-party liability and employee liability insurance cover
- Single insurance contribution payment certificate (Documento Unico di Regolarità Contributiva - DURC)
- For suppliers that have been given a target in line with SA8000, a performance review is conducted annually against their commitment to meet the requirements of the standard.
- Accident trends
- Open disputes with workers
- Possible SA8000 issues
- Ongoing CSR-related improvement projects, if any

5.10 Issue and distribution

This procedure is issued (drafted, checked and approved) by the RSGI

This procedure is distributed to DL, SPT,