

POLICY AGAINST CHILD LABOUR

1. PURPOSE

This document is issued to define Termisol Termica S.r.l.'s commitment against child labour and to meet the requirements of the SA8000:2014 standard (Requirement 1 - Child Labour). The purpose of this policy is to define the Organisation's procedures and responsibilities regarding prevention and management of any situations of child labour or young workers' employment found at its premises/construction sites or along the supply chain (suppliers, subcontractors and third parties operating on behalf of the Organisation).

Through this procedure, the Company establishes, documents, maintains and effectively communicates to staff and stakeholders the preventive measures and, if necessary, the remedial actions in favour of minors involved in situations that fall under the definition of 'child labour'.

This policy applies to Termisol Termica S.r.l. and its suppliers/subcontractors.

In line with the principles and values expressed in our Code of Ethics, the Company undertakes to:

- ❖ Not employing minors internally and preventing any form of child labour along the supply chain; furthermore, it refrains from exposing minors (even those who may be participating in authorised training courses) to situations that are risky, dangerous or harmful to their health.
- ❖ Respecting and communicating to internal and external stakeholders its commitment not to use child labour, either systematically or occasionally, and to promoting a culture of protecting young people at work.
- ❖ Comply with applicable collective agreements and all national/EU legislation on the protection of minors and young people at work, in particular:
 - Law No. 977 of 17 October 1967, as amended;
 - Legislative Decree No. 345 of 4 August 1999 (implementation of Directive 94/33/EC);
 - Law No. 296 of 27 December 2006, Art. 1, paragraph 622 (compulsory education for at least ten years and consequent raising of the age of access to work);
 - Any provisions applicable to internships, apprenticeships and work-study programmes.
- ❖ Comply with legislation protecting the needs of working students (e.g. Law No. 300 of 20 May 1970 - Workers' Statute, Art. 10).
- ❖ Comply with forms of collaboration with schools and educational institutions to promote the integration of young people into the labour market.
- ❖ Comply with forms of collaboration with local authorities to support child protection policies (e.g. at national, regional and local level).

The Company does not use and is opposed to the exploitation of child labour. To this end, a remedial programme is in place to deal promptly and effectively with any incidents that may be encountered, either directly or indirectly (e.g. at suppliers/subcontractors).

2. REFERENCE REGULATIONS

- ✓ Universal Declaration of Human Rights;
- ✓ United Nations Convention on the Rights of the Child (CRC);
- ✓ ILO Convention 138 and Recommendation 146 (Minimum Age and Recommendation);
- ✓ ILO Convention 182 (Worst Forms of Child Labour);
- ✓ ILO Convention 155 and Recommendation 164 (Occupational Health and Safety);
- ✓ Directive 94/33/EC (protection of young people at work);
- ✓ Law No. 977 of 17 October 1967, as amended (protection of children and adolescents at work);
- ✓ Legislative Decree No. 345 of 4 August 1999, as amended (adaptation to Directive 94/33/EC);
- ✓ Law No. 296 of 27 December 2006, Art. 1, paragraph 622 (compulsory education for at least 10 years);
- ✓ Standard SA8000:2014 (Requirement 1 - Child labour).

3. DEFINITIONS

Child: any person under the age of 15, unless local laws on minimum age provide for a higher age for work or compulsory schooling, in which case the higher age applies.

Application note (Italy): admission to work is only permitted after the completion of compulsory education; in application of the requirement for at least ten years of education, access to work does not normally occur before the age of 16, except in specific cases provided for by current legislation (e.g. level I apprenticeships).

Young worker: any worker who is over the age of a child (as defined above) and under the age of 18.

Child labour: any work performed by a child, as defined above, with the exception of light work permitted by ILO Convention 138 (Art. 7) and applicable regulations.

Forced labour: any work or service obtained from a person under threat of penalty and for which that person has not offered themselves voluntarily, or which is required as a form of payment for a debt.

Remedial action for children: any form of support and action necessary to ensure the safety, health, education and development of minors who have been involved in child labour and have been removed from it.

4. MANAGEMENT CRITERIA

The criteria set out in this procedure and the requirements determined in the SA8000 Standard are applied by Termisol Termica S.r.l. and required of its suppliers and subcontractors, who must operate in accordance with the established requirements, under penalty of corrective action up to and including exclusion from the supplier register.

The criteria for managing the *child labour* requirement (SA8000:2014 - Requirement 1) are as follows:

- 1.1 The organisation must not use or support the use of child labour, as defined above.
- 1.2 The organisation shall establish, document, maintain and effectively communicate to staff and other interested parties' written policies and procedures to remedy situations of child labour, and shall provide adequate financial and other support to enable children involved to attend school and remain in school until they are no longer covered by the definition of a child.
- 1.3 The organisation may employ young workers, but where such young workers are subject to compulsory education, they shall work only outside school hours. Under no circumstances shall the total time spent between school, work and travel exceed 10 hours per day, and in no case shall young workers work more than 8 hours per day. They are not permitted to work at night.
- 1.4 The organisation must not expose children or young workers to situations that are hazardous or harmful to their physical and mental health and development, either inside or outside the workplace.

Termisol Termica S.r.l. declares that it does not use child labour either directly or indirectly and that it does not directly or indirectly support such practices.

In fact, Termisol Termica S.r.l., in full compliance with Italian, European and international legislation on the protection of minors, applies as **an essential requirement for the commencement of an employment relationship that the employee must be at least 18 years of age.**

The operating procedures for preventing, verifying and remedying situations of child labour (including along the supply chain) are set out below:

- ✓ **Age check during recruitment:** Termisol Termica S.r.l. provides for and applies a check whereby the age of the candidate is verified at the time of recruitment through identity documents and visual verification; this procedure ensures that no personnel who fall within the definition of *child and/or young worker* are hired;
- ✓ **Communication and awareness:** Termisol Termica S.r.l. specifies its intention to communicate to staff and interested parties the policies and procedures for promoting the education of children covered by ILO Recommendation 146 and young workers subject to local compulsory education laws or who are attending school;
- ✓ **Field and supply chain monitoring:** Termisol Termica S.r.l. does not use child labour and always monitors, both through visual checks at construction sites and/or at its suppliers or third parties, and through accounting records of hours worked (time cards, site reports, etc.) etc.) and/or interviews with the persons concerned and/or their superiors, that under no circumstances shall the total hours spent between school, work and travel exceed 10 hours per day, and under no circumstances shall young workers work for more than 8 hours per day. Young workers are not required in any way to work at night;

- ✓ **Support and remedy:** Termisol Termica S.r.l. undertakes to provide adequate financial and/or other support to remedy situations involving children and/or young workers in order to allow the children involved to attend and remain in school until the age specified in the definition of a child described above;

If children or child labour are found in the workplace, including at suppliers or third parties, Termisol Termica S.r.l. will immediately implement the following:

- Propose or implement the immediate termination of the child's employment/involvement and removal from any work activity, ensuring that this does not cause further harm.
- Propose and facilitate the involvement of parents/guardians in order to share a documented remedial plan (education, financial support and/or other appropriate measures).
- Propose and facilitate initiatives aimed at providing a subsidy to the child in order to enable them to attend at least compulsory schooling, monitoring their attendance with the involvement of social workers;
- Assess the causes of child labour within the company and implement corrective/preventive actions to avoid recurrence. If the case involves a supplier/subcontractor: issue corrective actions, verify their effectiveness and, if the issue is not resolved, escalate to the suspension/termination of the relationship.
- Communicate the findings and the related remedial plan adopted to stakeholders.

Termisol Termica S.r.l. undertakes not to expose children and/or young workers to situations that are risky or harmful to their physical and mental health and development, both inside and outside the workplace, by assessing the risks in the Risk Assessment Document, and by educating and training young workers to make them aware of the general and specific risks of the activities entrusted to them, both for their own health and safety and that of others.

This policy is published on the company website and posted at the headquarters and, where applicable, on notice boards at construction sites, together with other company policies, and is the subject of specific information/training for workers.

This policy is reviewed at least annually and when there are significant regulatory changes or updates to the SA8000 standard.

Livorno 07/01/2026

The Chairman of the Board of Directors

Renzo Mannucci
