

PURPOSE

At Gi Group Holding, we are aware of the social and public service role we play as an ecosystem of HR companies; therefore, we are committed to actively preventing or mitigating negative human rights impacts that may be related to our services.

Beyond the mere compliance to law, at Gi Group Holding our people pursue a well-defined goal with great passion: to contribute, every day, **to change the labour market and people's lives for the better.**

This commitment is also fundamental part of **Our Sustainable Work Manifesto**, which inspires the daily actions of the Group's companies with respect to four pillars:

- DECENT AND SAFE WORK
- EMPLOYABILITY AND SATISFACTION
- DIVERSITY, EQUITY AND INCLUSION
- SAFEGUARDING RESOURCES FOR THE FUTURE

In particular,

DECENT AND SAFE WORK:

<<Sustainable Work guarantees dignity, regular contracts, protection from exploitation, safe working conditions, fair income, equality, personal wellbeing, and empowerment for individuals to have a voice in these areas.>>

This Policy aims to establish the general operating **framework** of Gi Group Holding, by virtue of which each Group Company can ensure full compliance of human resources management and service provision with the following objectives.

- **Effectively combatting informal labour** to eliminate all forms of exploitation, unsafe and illegal work, guaranteeing people full protection of their rights and benefits and effectively supporting people in career transitions.
- **Ensuring Human Rights and inclusive working conditions** to recognise the value of even the most vulnerable people, through greater understanding of their capabilities and sensitivities, and facilitating access to career guidance and training to improve their employability and satisfaction.
- **Developing initiatives and tools** that favour the evolution of the world of work in an increasingly inclusive, non-discriminatory and safe way, pursuing the dissemination of a culture of Sustainable Work **through** our value chain, for people, organizations and society.

SCOPE

This Policy is issued by Gi Group Holding S.p.A. (hereinafter also the "Parent Company") and it applies to all the companies directly or indirectly controlled by it, or to its affiliates, in Italy and worldwide (hereinafter referred to as "Gi Group Holding" or simply the "Group's Companies"), which formally adopt it and implement it.

It applies to all current and potential Personnel of Group companies, Candidates and Workers. It also applies to all external stakeholders.

GI GROUP HOLDING'S COMMITMENTS

- Not to favour, engage or support the use of child labour, not only by complying with laws and regulations, but by putting also in place **processes and procedures to eliminate the risk of child labour.**
- Not to favour, use or support practices of forced labour, modern slavery, and human trafficking, not only through the exclusive use of legal recruitment channels, but also by **actively combating informal and illegal labour** and ensuring that all categories of workers do not incur any cost to be recruited (responsible recruitment/free employment).
- **To provide adequate, accessible, safe, and healthy workplaces** and take measures to prevent accidents, injuries, and occupational diseases within the area of its responsibility.
- **To respect the right of staff to join workers' associations and collective bargaining**, ensuring that they are not discriminated against or penalised because of their membership.
- **Not to engage in or support any type of discrimination** against personnel, whether in the selection process, working conditions or human resources management, also ensuring that no one is discriminated against in recruitment or employment practices on the basis of any legally protected characteristic and any personal characteristic that does not interfere with a worker's ability to perform a specific job.
- **Not to engage in or support disciplinary practices or verbal abuse** conflicting with respect for human dignity, and communicate effectively with workers about the code of conduct and the disciplinary procedures adopted.
- **To comply with thresholds set forth by ILO or industry standards**, national laws, and applicable collective bargaining agreements on working hours, not only by tracking the number of hours worked by personnel in a clear way and with their confirmation, but also allowing overtime only if agreed with personnel, and providing days off and access to leaves, breaks and holidays.
- **To pay wages regularly, fully, in a timely manner and in accordance with contractual conditions** agreed in advance with each employee/worker, by ensuring that compensation for standard working hours meets or exceeds applicable legal minimum wage, industry standards or collective bargaining agreements (where applicable), also considering the criteria to meet the pertinent local living wage.
- **To choose to work only with customers and suppliers who share our commitment to Human Rights protection**, by making available to all our commercial partner our Code of Ethics and Sustainable Work Manifesto, and by making all reasonable efforts to ensure that significant risks identified within our value chain are adequately addressed.
- **To allow people to have a voice** on Human Rights issues in the workplace, respecting the right of our Stakeholders to freely organise and express their demands and concerns.

ROLES AND RESPONSIBILITIES

The Policy clearly identifies roles and responsibilities for the implementation of commitments and actions required by the Policy to:

- the Top Managers of Gi Group Holding S.p.A. and of the Group's companies;
- the Global HR Department and to each Country HR Department;
- the Corporate Affairs & Compliance Global Department;
- the Global Purchasing Department;
- the Global Corporate Social Responsibility Team (CSRT).

Everyone at Gi Group Holding is responsible for implementing and disseminating the Policy through its behaviour.

IMPLEMENTATION

An inventory of Human Rights risks in the workplace is progressively implemented, in order to verify that the organisation's activities do not cause or contribute to cause negative impacts on Human Rights.

Taking into consideration the priorities

- given by the United Nations, ILO and WEC,
- emerged in the risk assessment mentioned above,
- and expressed by our Stakeholders and by the Top Management of the Parent Company,

we ensure that respect for Human Rights is always integrated in our activities, policies and decisions, by progressively

- designing appropriate procedures and defining specific objectives, both regarding HR management and service delivery;

- implementing a programme of communication and training activities and initiatives on these topics,
- constantly sharing best practices with our internal and external Stakeholders,
- and monitoring the appropriate KPIs.

This Policy is made **known to all Group's personnel** through appropriate communication activities and via posting on the Group Company's' intranet.

Each Group's Company plans and manages the **mandatory training** on the issues addressed in this Policy.

GRIEVANCE AND DISCIPLINARY PROCEDURES

Gi Group Holding promotes a culture that does not admit any retaliation towards any reporting of breach (or suspected breach) of this Policy. Individuals who believe they have detected a case of violation of Human Rights may report the case without fear of retaliation.

Any violations of this Policy may be reported:

- to the line manager.
- to the Country HR department.
- to the Global CSR Team at the e-mail address CSRT@gigroup.com or by post to the address CSR Team - piazza IV Novembre 5 - Milan - Italy

and especially

- through the **Gi Group Holding Reporting Channel** available also on Group websites in line with the provisions of the "**Whistleblowing Global Policy**".