

## 01.PURPOSE

For Gi Group Holding, the commitment to Social Responsibility is an integral part of the Group's Mission:

*"Through our services we want to contribute, as a key player and on a global basis, to the evolution of the Labour Market and to emphasize the personal and social value of work."*

In this framework, this Suppliers' Code of Conduct (also called **SCoC**) sets out the values and principles that the Group (hereinafter "Gi Group Holding") has decided to adopt in conducting its business and in its dealings and relationships with all its Stakeholders.

Gi Group Holding works to ensure that the interests of all parties involved in its business are respected, and trusts that its Stakeholders are equally guided by the **principles of integrity, loyalty, honesty, transparency, respect for the rules and the law, and the absence of conflicts of business or personal interests.**

## 02. SCOPE

The SCoC is adopted by all the companies controlled by Gi Group Holding Spa, or to its affiliates, in Italy and worldwide.

**The SCoC applies to all current and potential Group's Suppliers: it defines commitments for the Group's Suppliers, the observance of which becomes an essential factor in starting and/or continuing a collaboration with them.**

Suppliers undertake to ensure that their subcontractors and sub-suppliers also comply with the principles required by Gi Group Holding.

## 03.GENERAL PRINCIPLES OF CONDUCT AND SUPPLIERS' COMMITMENTS

### LEGISLATIVE AND REGULATORY COMPLIANCE

In its actions and through their organisation, Suppliers shall comply with international, national and local laws on working conditions, business ethics, health and safety and the environment.

Suppliers must prove the possession of the necessary authorizations to carry out the assignment/supply entrusted or must take action and obtain them within three months of the assignment.

In cases where industry standards and/or international guidelines are stricter than locally applicable legislation, Suppliers shall comply with these requirements.

### HUMAN RIGHTS IN THE WORKPLACE

Suppliers must commit to operate in **compliance with the laws and regulations** in force in the countries in which they operate, adopting behavioural criteria, policies and operational practices aimed at respect human rights and workers rights.

- Suppliers are required to contribute to the **effective abolition of child labour**, implementing processes and procedures to eliminate the risk of child labour; and, if necessary, taking measures to remedy established violations, helping the child removed from the workplace and his/her family to access viable alternatives.
- Suppliers undertake to **combat all forms of forced and compulsory labour**, implementing processes and procedures to eliminate practices of modern slavery/human trafficking; adopting free employment/responsible recruitment practices, ensuring the workers employed have not been charged money in the promise of a job or under any other pretext; and taking measures to remedy established violations, for example, reimbursing the money to the workers.
- Suppliers undertake to **eliminate all forms of discrimination**, implementing processes and procedures to manage selection, recruitment, training, remuneration and management of human resources based on merit and competence; and taking action to overcome any existing gaps based on gender bias or other individual characteristics such as (but not limited to) religion, national or

ethnic/racial origin, cultural or social background, disability or illness, sexual orientation, age, marital status or political opinion.

- Suppliers must **respect workers' rights**, in particular recognising the right of association and collective bargaining; implementing disciplinary measures that safeguard the dignity of workers; respecting threshold on working hours and recognising proper remuneration, in order to enable a decent standard of living.

### HEALTH & SAFETY

Gi Group Holding makes the protection of health and safety at work a key principle of its way of doing business.

Therefore, it asks the Supplier to define and maintain **Occupational Health and Safety Policies** aimed at providing safe and healthy working conditions to its employees **in compliance with the applicable legal requirements.** Especially:

- Suppliers are required to adopt the principles of the Management Systems which, inspired by the ISO 45001 standard (or equivalent), promote the continuous improvement of performance.
- Suppliers are committed to spreading and consolidating a culture of safety that promotes responsible behaviour on the part of workers by training employees.
- When its activities are outsourced, the Supplier undertakes to adopt the applicable legislation and to eliminate, where possible, the hazards to the health and safety of workers, as well as to assess the residual risks, implementing solutions aimed at reducing them to a minimum level.
- Suppliers who carry out their activities at Gi Group Holding locations are asked to adopt the same Health and Safety Standards.

Gi Group Holding has **zero tolerance** for offensive, discriminatory, dangerous or slanderous behaviour and strictly prohibits physical or emotional aggression, the use of obscenities and verbal aggression, harassment, mobbing or bullying. Therefore we ask to our Business Partners to operate according to the same approach, in order to eliminate violence and harassment in the world of work.

### BUSINESS CONDUCT

Suppliers must commit to operate in accordance with the principle of **legality, fairness, confidentiality, honesty and transparency** in their contractual relationships with Business Partners.

### ANTI-CORRUPTION

Gi Group Holding is committed to **fight against corruption in all its forms**; we refrain from offering, paying or accepting sums of money as bribes, and also refuse offers, gifts or hospitality that could lead to or suggest undue influence.

Likewise, Gi Group Holding requests its Suppliers to refrain from any practices relating to corruption or bribery in order to influence decision-making and obtaining advantages.

### PRIVACY AND DATA SECURITY

Gi Group Holding guarantees that the processing of the personal data of its employees and individuals who come into contact with the Organization is carried out with respect for the fundamental **rights and freedoms**, as well as the **dignity** of those concerned, as set by the **regulatory provisions in force** in the countries in which we operate.

Gi Group Holding processes personal data lawfully and fairly and records data collected only for specified, explicit, and legitimate purposes, keeping it for a period of time no longer than necessary for the purposes of collection.

It takes appropriate **security measures** during the collection and storage of personal data in order to avoid risks of destruction or loss of personal data, unauthorized access, or unauthorized processing.

The Supplier of Gi Group Holding, undertakes:

- to act in accordance with applicable data protection laws, respecting the rights and freedoms of all data subjects whose data it processes;

- to use the personal data collected only for legitimate purposes, defined and appropriate to the conduct of its business: under no circumstances may those authorized to process the data use the information for purposes unrelated to the conduct of business activities;
- to process personal data in the agreed manner: the collection, processing and storage of any personal data may be carried out only by persons expressly authorized to do so;
- to prepare and implement organizational and technical measures aimed at ensuring the confidentiality, integrity and availability of processed personal data;
- to take appropriate measures so that data is stored accurately and for a period congruent with the expressed need, ensuring that it is kept up-to-date;
- to protect access to data by unauthorized parties, ensuring its integrity and confidentiality through the most suitable technical and organizational tools;
- to promptly report any incidents or cyber attacks suffered that pose non-negligible risks to the rights and freedoms of the data subjects, and to initiate all appropriate procedures suitable for the resolution of the event.

Within the business relationship, no Supplier is authorised to convey personal opinions in the name of Gi Group Holding on any channel, including social media. The disclosure of information and data or the use of logos are possible only by the explicit authorization of the relevant functions.

Everyone who works at or on behalf of Gi Group Holding undertakes to respect the strictest privacy procedures to protect all parties concerned, adhering to relevant legislation and agreed commitments relating to the hiring contract or specific non-disclosure agreements.

## ENVIRONMENTAL SUSTAINABILITY

Gi Group Holding conducts its activities in **respect of environmental protection laws and standards**, with the awareness that all Companies, irrespective of the nature of their business, are called on to implement good consumer practices that guarantee a balance between the use of natural resources and their regeneration. For this goal the **collaboration of the entire supply chain** is a fundamental and indispensable element.

Therefore, Gi Group Holding gives priority to Suppliers who implement targeted actions to minimizing the use of non-renewable resources and keeping the consumption of renewable resources within the limits of their replenishment, asking them for availability and transparency regarding the communication of emissions deriving from business processes and activities, and the commitment to implement effective measures to reduce direct and indirect CO2 emissions.

In particular, in order to **minimise the impact of their activities on the environment**, Suppliers must:

- commit to prioritising the use of renewable sources, minimising the environmental impact of their activities, protecting local ecosystems and biodiversity, promoting the conscious and responsible use of all available natural resources, adopt systems to ensure the safe handling, storage, recycling, reuse or management of waste and the management of emissions into the atmosphere and waste water in accordance with existing legislation, also supported by the adoption of Certified Management Systems according to recognized Standards;
- commit to optimising the use of natural resources, reducing emissions that are harmful to the environment, those responsible for the "greenhouse effect";
- manage appropriately, in accordance with current regulations, the treatment and disposal of waste, reducing as much as possible the production of waste destined for disposal in landfills in favour of recoverable waste;

- avoid the use of hazardous substances where technically possible, and when their substitution is not feasible, handle them in accordance with the applicable standards;
- adopt optimized logistics procedures and encourage the use of means of transport that minimize the impact on the environment and reduce the impact of distribution;
- prefer recyclable packaging and FSC-certified paper, guaranteeing the origin of the product from a responsibly managed forest and supply chain.

## 04.ADDITIONAL CRITERIA

Gi Group Holding gives **priority** to those Suppliers that have management systems in place (especially if certified) or endorse (signed or public adherence) publicly one or more of the following international or industry sector initiatives, set of principles, charters, frameworks.

Reference taken into account can be (by way of example, but not limited to):

- quality management systems;
- standards and international recognized initiatives on human rights at work / corporate social responsibility topics;
- standards in place on health and safety topics;
- standards in place on business conduct or anti-corruption/anti-bribery topics;
- standards in place on privacy and data protection topics;
- standards in place on environmental topics.

Elements of interest are also represented by:

- ESG reporting initiatives where key performance indicators are formally aligned with a sustainability reporting standard (e.g. ESRs, GRI, SASB or others);
- adoption of B Corp status and/or certification;
- membership of the EU Platform of Diversity Charters
- membership of US Supplier Diversity Program (SDP) or comparable recognition;
- status of Third Sector Entity, or social cooperatives and social enterprises, NGO and similar no profit organizations.

## 05.IMPLEMENTATION AND MONITORING

Suppliers are kindly requested to share information about their ESG rating on international recognised platform and specialised indexes: it also could be requested to share the result of related scorecard as Ecovadis, CDP, .....

In order to verify compliance with this **SCoC**, Gi Group Holding may subject Suppliers to **periodic assessments, audits or checks** also interviewing active workers at our premises (on site suppliers).

Should it emerge that a Supplier is totally unable to comply with the provisions of the SCoC , Gi Group Holding shall define with the latter an improvement action plan and share the measures to be taken so that, within the agreed period, the Supplier can ensure compliance.

## 06.GRIEVANCE SYSTEM

Each recipient undertakes to report any behaviour or situation that is in breach of

- the laws in force,
- the provisions laid down in this SCoC,
- the relevant principles of the Gi Group Holding Code of Ethics and its related High Level Global Policies,

through the online tool **Gi Group Holding Reporting Channel**, available also on Group websites.

Each report will be processed so as to protect the identity of the whistleblower and guard against the risk of retaliation and discrimination.