

PURPOSE

The present Policy descends directly from our Code of Ethics and is **strictly connected to our “Fundamental Human Rights at Work Global Policy”**: the document sets out how Gi Group Holding pursues its commitment to combat child labour and to protect all workers, starting with the youngest.

Therefore, the purpose of this Policy is:

- to put in place processes and procedures to protect children and young people from the risks of undeclared work, taking remedial action where necessary;
- not to hinder, as employers, the educational right/duty of children and young people;
- to allow young workers a pathway into the world of work that protects their physical and psychological integrity, overseeing the correct application of relevant rules and laws;
- to protect their right to a dignified and satisfying personal and professional future, enhancing talents and aspirations of children and young people.

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

- **To comply with laws, adopting the criterion of maximum protection for children** and implementing processes and procedures to eliminate the risk of Child Labour, according to the ILO suggestions.
- **To raise staff awareness** on the importance of school attendance and the risks of child labour, also involving employees in orientation initiatives for young people.
- **To cooperate** with the different stakeholders **to remedy identified child labour situations** and to prevent, where possible, this risk in the communities in which we operate.
- **To facilitate access to quality education and training**, enabling the fulfilment of the educational obligations set by different countries.
- **To carefully look after young people’s access to apprenticeships or vocational training for students**, ensuring that they are not associated with exploitative situations.
- **To pay the utmost attention to compliance with the laws on youth employment** (>15 and <18 years old) and apply all measures in our power to protect young workers.

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 Corporate Social Responsibility Team (CSRT).

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

IMPLEMENTATION

As for our “Fundamental Human Rights at Work Global Policy”, Gi Group Holding progressively implement

- an inventory of Human Rights risks in the workplace, ensuring that every verified impact on child labour is addressed;
- appropriate procedures and specific objectives, both regarding HR management and service delivery;
- a programme of communication and initiative in order to enhance awareness and share best practices internally and externally;
- training activities appropriate to the different roles of all Employees,
- and appropriate KPIs to be monitored.

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 Child Labour or considers that Young Workers are not protected under the law 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”.