

ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR, MODERN SLAVERY AND HUMAN TRAFFICKING GLOBAL POLICY

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 all forms of compulsory and Forced Labour, modern slavery and human trafficking**.

Therefore, the purpose of this Policy is:

- to fight **human trafficking**, strengthening the role that our Group’s companies, and in particular our staffing agencies, can play in counteracting unscrupulous employment agencies, informal labour intermediaries and other operators acting outside the legal and regulatory framework that prey especially on low-skilled workers;
- to combat all forms of **modern slavery**, guaranteeing all workers legal and protected pathways into the labour market, not taking advantage of their possible state of need, but rather enhancing their employability;
- to eliminate all forms of **forced labour**, enabling all workers to have freedom of choice in the labour market, working under decent and safe conditions;
- to mitigate the associated risks in our supply chain.

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 international and national laws and regulations, adopting the criterion of maximum protection of personal freedom and dignity**, by implementing processes and procedures to eliminate risks related to human trafficking and modern slavery/Forced Labour in personnel management.
- **To raise staff awareness** on the persistence of human trafficking/modern slavery situations in the markets in which we operate, providing guidance on how to identify possible warning signs, including through the provision of training courses on human rights and ethical principles of business conduct.
- **To pay the utmost attention to compliance with laws on fair recruitment**, applying all measures in our power to protect jobseekers.
- **Collaborate** with our stakeholders **to remedy identified situations of modern slavery** and to prevent, if possible, this risk in the communities where we operate.

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 implements

- an inventory of Human Rights risks in the workplace, ensuring that every verified impact on forced labour, modern slavery or human trafficking 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 forced labour, modern slavery or human trafficking 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**”.