



Code of Ethics

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Foreword



Foreword

Gi Group Holding is a global ecosystem of HR services and consulting which supports the development of the labour market by **creating sustainable social and economic value, promoting a positive working culture and contributing to change people's lives.**

In this framework, this Code of Ethics 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. This Code now represents an integral part of Gi Group Holding's Corporate Governance policy.

"To embrace, support and enact the set of core values in the areas of human rights, labour standards, the environment and the fight against corruption"

This Code of Ethics conforms to the request made by the United Nations, "to embrace, support and enact the set of core values in the areas of human rights, labour standards, the environment and the fight against corruption" codified in the **Universal Declaration of Human Rights**, in the **International Labour Organization Declaration** on the fundamental principles and rights at work and in **Global Compact's Ten Principles on Human Rights, Labour, the Environment and Anti-corruption**.

As a **Global Corporate Member of the WEC** - World Employment Confederation, Gi Group Holding has adopted the **WEC Code of Conduct** and identifies with the OECD Guidelines for Multinational Enterprises. This document is issued and endorsed by the Parent Company and is effective for all Companies within the Group, which formally

adopt and incorporate it within their own policies and training schemes. Its guidelines and the principles expressed herein are to be incorporated alongside any local codes, regulations or policies adopted by individual Group Companies or, as mandated by local regulations, to detail the various aspects of the business and corporate relations.

The Code of Ethics is a binding reference point for all Employees and Collaborators, from the Group's Directors to those in supporting roles, which guides the daily work and interpersonal relationships both internally and externally with society and the market. Under no circumstances shall the belief that they are pursuing the interests and objectives of the Company they work for justify the violation of the Code of Ethics, which will have priority over any other in-house regulations, procedures and contractual relationships that conflict with it.

Gi Group Holding is confident that its Stakeholders identify with the values on which the Code of Ethics is founded, share and apply them as the basis for business behaviour 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.**

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Gi Group Holding's Mission, Vision and Core Values



Gi Group Holding's Mission, Vision and Core Values

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.”

VISION

“We want to be recognised as the worldwide player responsible for creating a sustainable and enjoyable Global Labour Market for Candidates and Companies, reflecting Market needs. ”

In Gi Group Holding's view, promoting a Sustainable Work culture means creating the conditions for people to be able to develop their professional skills and remain active during their entire life with a view to constant employability, eliminating factors that discourage or hinder access to and remaining and growing in the world of work.

VALUES

The work of each individual Company within the Group is based on a set of values that aligns Gi Group Holding's approach to the labour market and the societies in which it operates.



CARE

We take the utmost care and pride in what we do and believe that our work should always be carried out to the best of our abilities to create value for People, companies and us by providing simple and clear solutions.

Gi Group Holding is well aware of the public and social role of its mission and pursues it with the utmost care and attention. The work must be done well, for themselves and for those for whom it is intended. In this context, Gi Group Holding's core principle is based on service quality, which is oriented towards:

- Customers: including Companies, Workers or Candidates: to address their specific needs by offering effective, targeted and long lasting solutions and tools that create value;
- People: to strengthen the recognition of their centrality in what we do and the great importance that work - or looking for work - has for them, always treating every individual respectfully and taking care of them with the conviction that the Company plays an educational role in their lives.



PASSION

We are passionate about the work we do and each one of us is committed to ensuring that the needs, aspirations and objectives of our colleagues, candidates and clients are met.

"Through our work, we endeavour to contribute to the efforts that all People and all populations make to lay the foundation for their happiness".

Gi Group Holding conceives work as a means for People to be fulfilled, realise their aspirations and to actively participate in the creation of a greater 'well-being' that can endure into the future. This is why Gi Group Holding encourages its Employees and representatives to carry out their work mission becoming passionate about creating job opportunities that meet the needs and objectives of People and Clients.



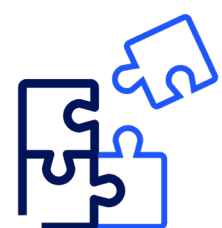
CONTINUOUS LEARNING AND INNOVATION

In a fast-changing world, we are constantly driven by curiosity and a genuine desire to learn, sharing our professional and personal knowledge to support the growth and evolution of our organisation and stakeholders.

Gi Group Holding is committed to developing the capabilities and skills of all its Employees, Candidates and Workers, feeding People curiosity, valuing and respecting diversity, allowing each individual to fully express their energy and creativity, so that everyone can realise their potential.

Continuous learning, improvement and innovation enable us to do our best work, adapt quickly to economic and social changes and ensures business continuity by creating new solutions, ultimately benefitting all Stakeholders.

This is seen in the way Gi Group Holding employees make themselves available to Colleagues, Workers, Candidates, Clients and Institutions, sharing their personal and professional expertise in their daily work, through dedicated training channels and through voluntary initiatives.



COLLABORATION

We believe that working as a team, fostering a culture of collaboration, regardless of the roles, is the way to achieve our challenging objectives and enjoy our work.

Gi Group Holding believes that People are its main asset, and that engagement with the Company's Mission are essential to its ability to achieve it. Gi Group Holding recognizes the importance of:

- communication and team spirit, as an indispensable factor in making work enjoyable and boosting one's sense of belonging;
- collaboration between Employees and business units, based on reciprocal respect for the professionals within the Company so as to achieve the Group's shared goals;
- Work-Life Balance diffusion as well as open exchange of views with Stakeholders, to guarantee shared growth.

Everyone at Gi Group Holding – regardless of role, responsibility or seniority –, is expected to create synergy and establish positive relationships with their Colleagues, to exchange views openly and make proposals for improving the Company's services and processes, thus creating value for all Stakeholders.



SUSTAINABILITY

We grow always valuing our human, financial and environmental resources, mindful of future generations.

Gi Group Holding believes that a company balance and performance conditions are of major importance in order to sustain a healthy business and meet the objectives of its stakeholders.

Company growth must be based on the maximum enhancement of the resources that are given to us, reconciling protection of human potential, economic performance, social responsibility and environmental sustainability.

Gi Group Holding staff feel that they are at the service of their environment and not vice versa.

In fact, they are committed to ensuring that company service meets both the needs of the present and future generations.



RESPONSIBILITY

We promote the respect of human rights and of diversity and inclusion; we support all legislation that provide greater protection to workers and take an active role in eradicating corruption and any form of abuse or illegal behaviour.

Gi Group Holding, as a multinational labour company, is expected to act as a leading point of reference for Institutions and takes an active role in establishing new and better local and global practices for the development of both local communities and labour market, with absolute respect for the laws and in accordance with the principle of free, regulated and fair competition.

It is also aware that its commitment to build the common good through its daily activities falls within the individual responsibility of the company's employees.

Everyone within Gi Group Holding is therefore called upon to consciously act and communicate, within its sphere of influence, having in mind corporate and Stakeholders reputation, supporting:

- universally-recognised human rights, and actively safeguard them;
- diversity and inclusion, abiding by the principles of equality, impartiality, the

protection of personal dignity and safety and the eradication of all forms of discrimination;

- the laws of the countries where the Group operates, resisting all forms of abuse and corruption;
- the legislation that regulates workplace health and safety, spreading a zero-risk culture and adopting the most effective preventative measures;
- the environment, by adopting the very latest initiatives, technologies and practices aimed at protecting it.

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General Principles of Conduct Towards Stakeholders



General Principles of Conduct Towards Stakeholders

Gi Group Holding is governed by strong ethical principles, underpinned by a clear emphasis on **individual responsibility**, as a way of encouraging everyone who works for Gi Group Holding, in particular its Employees and Collaborators, a full awareness of the consequences of their professional choices, not only for their own benefit and that of the organisation, but also that of all other Stakeholders inclusive of Workers, Candidates, Customer Companies, Institutions, Local Communities, Suppliers, Competitors and any other economic or social stakeholder within the labour market.

In accordance with its **Corporate Social Responsibility Policy**, Gi Group Holding asks its Business Partners, Customers and Suppliers to read its Code of Ethics and invites them to comply with its conduct guidelines, working with maximum joint collaboration and aligning with the principles included in the Code.

LEGALITY

Gi Group Holding works with Public Administration, Institutions and all other Stakeholders in **respect of laws** in force in the countries where it operates – adopting behavioural criteria based on the principles of transparency and fairness and undertaking to sustain in its policies and work practices:

- the effective **abolition of child labour**;
- the **elimination of all forms of forced and compulsory labour**, also combatting practices of modern slavery and human trafficking;
- the **free association of Workers** and the right to collective bargaining;

- the **elimination of all forms of discrimination**;
- the **respect of all laws** that regulate the labour market in relation to workplace health and safety, disciplinary procedures, working hours and remuneration;
- the **fight against corruption** in all its forms, including extortion and bribery.

In particular, all company representatives are strictly prohibited from conducting unauthorised dealings with Public Administration, including the exchange of money, favors or gifts, putting pressure on them, issuing false declarations or any other fraudulent behaviour that violates the law, even if exercised in the false belief that they are pursuing the Company's interests and objectives.

FAIRNESS

Gi Group Holding bases its activities on the principle of **fairness**; balancing the unique interests of the individual – of each Employee, User, Customer and Supplier – with those of the Company, and valuing diversity and mutual respect in accordance with the values and principles of this Code of Ethics.

The principle of fairness underpins, in particular, the behaviour of everyone who works at or on behalf of Gi Group Holding:

- in its dealings with **Employees, Candidates and Workers**, in which the selection, recruitment, training, remuneration and management of human resources is to be based exclusively on merit and competence, without any kind of discrimination based, for example, on gender, religion, national or ethnic origin, cultural or social background, disability or illness, sexual orientation, age, marital status or political opinion;
- in its dealings with **People**, towards whom no prejudice or unfair treatment is permitted and working conditions that favor the development of the individual's personality and professionalism are promoted;
- in its relationships with **Customers**, in order to be able to provide services of an increasingly high quality, taking account of the particular requirements of each;
- in its dealings with **Suppliers**, in which Gi Group Holding does not intend to deny anyone that meets its criteria, the possibility of winning contracts, opposing any practices that influence Suppliers to enter a contract that is unfavourable for them.

CONFIDENTIALITY

Gi Group Holding safeguards the **privacy** of all Stakeholders and the **confidentiality of the information and personal data** in its possession. The collection, processing and storage of any personal data may only be performed by individuals expressly authorised to do so under the direct authority of the data controller or processor.

The data must be collected and processed for specific, explicit and legitimate purposes, and according to the principles of adequacy, relevance and limitation, and under no circumstance are those authorised to process the data permitted to use any information for purposes not connected to the exercise of company activities.

Considering the sensitive nature of the information and documents handled (including CVs, payslips, sales and work contracts, corporate climate surveys, head hunting activities, outplacement processes, ...), 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.

HONESTY

Gi Group Holding affirms that honesty is a prerequisite for **building credibility and developing with all Stakeholders relationships** that are based on trust that help to improve the operation, image and reputation of the sector. **Honest, efficient and ethical business management** must characterise the work of the Company representatives at all levels, inside and outside the Group:

- according to the principles of the market founded on **respect** for People, free enterprise and regulated competition, on the basis of results and benefits of reciprocal interest and for the community;
- always **taking care** of the Company's tangible and intangible assets, by categorically avoiding the loss, damage or misuse of any asset, data, commercial information or professional relationship with Candidates, Workers, Customers and suppliers, which represents an asset of the Company and must be treated as such in order to to guarantee the proper provision of services.

TRANSPARENCY

Gi Group Holding bases its actions, communications and provision of information on the principle of transparency, emphasising the value of gaining the trust of our internal and external Stakeholders. Transparency represents a governing principle, in particular:

- with **respect to the management of the Company and contractual relationships** with Business Partners, Customers, Suppliers, Candidates and Workers, which must be fair, clear and transparent;
- with **respect to the costs of the services offered**, which must be clearly expressed and which, for services associated with the selection and recruitment of workers, must never be charged to Candidates or Workers;
- with **respect to the external communication** of the Company information, which must be truthful, simple, comprehensible, prompt and accessible to everyone.

In particular, no Employee or Collaborator is authorised to convey personal opinions in the name of the Group or any of its companies on any channel, including social media. The disclosure of information and data relating to the Company, or the use of logos is possible only by the explicit authorization of the relevant function.

HEALTH & SAFETY

Gi Group Holding undertakes to fulfil all its legal obligations in relation to **Hygiene, Health and Safety**, starting with a thorough risk assessment, followed by the clear definition of prevention and protection, so as to ensure effective workplace safety and security. Without exception, all Employees, Workers and Collaborators who act on behalf of Gi Group Holding, are required to:

- **respect the rules**, dutifully following any specific procedures related to their role: the violation of regulations are never tolerated for any reason;
- **commit to positively influencing** their Colleagues in relation to good conduct principles, acting as promoters of workplace safety, including appropriate and expected behaviours in the workplace and in personal attire;
- **adopt attitudes and behaviour based on the principles of respect, consideration, sobriety and courtesy** when dealing with Colleagues and third parties alike.

Gi Group Holding will intervene to prevent any instance of offensive, discriminatory, dangerous or slanderous behaviour and strictly prohibits physical or emotional aggression, the use of obscenities and verbal aggression, harassment, mobbing or bullying, and will apply the appropriate disciplinary measures or penalties.

Moreover, Gi Group Holding requires its employees to be aware of the negative effects of alcohol and drugs on their own health and that of other people, both inside and outside

the workplace.

For Gi Group Holding, this means ensuring **good working conditions**, both by protecting the worker's psychophysical well-being and by respecting the dignity of all.

Gi Group Holding also intends to raise awareness among Business Partners, Customers and Suppliers to operate according to the same approach.

ENVIRONMENTAL SUSTAINABILITY

Gi Group Holding conducts its activities in respect of all 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.

Therefore, Gi group Holding undertakes initiatives that promote **greater environmental responsibility** also in its employees.

In its analysis of the environmental impact of its business, the Group takes into account and monitors the consumption of energy, fuel for the company fleet and consumable materials, adopting, where possible, technologies that reduce environmental impact and raising awareness among Business Partners, Customers and Suppliers to operate in accordance with the same principle.

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Implementation and Control

Implementation and Control

RECIPIENTS OF THE CODE

The Recipients of this Code are:

- the members of the decision-making and supervisory bodies of the Companies in the Group, the Managers and Employees that belong to the organizational structures;
- Workers on temporary contracts;
- external Collaborators and Consultants who act in the name or on behalf of the Companies in the Group.

The provisions of the Code of Ethics are also intended, where expressly indicated, for external Stakeholders with whom the Companies in the Group conduct relations (Business Partners, Suppliers, Customers, Institutions ...).

DISCLOSURE AND KNOWLEDGE OF THE CODE

It is in Gi Group Holding's interests that the Code of Ethics be distributed to all Recipients and third parties and that the values it contains be shared. In order to guarantee the broadest possible distribution, it is also published on the Company internet and intranet sites.

The directors and department managers of the Companies in the Group must demonstrate through their work the values and provisions of the Code of Ethics, making every effort to ensure they are understood and pursued by everyone. The Employees, Collaborators and Consultants must adapt their conduct in accordance to the values, principles and objectives contained in the Code of Ethics. All Recipients and, as far as applicable, also the Business Partners, Customers and Suppliers and the other Stakeholders concerned will be familiar with the provisions laid down in the Code of Ethics, the reference standards and the corporate procedures that regulate each specific internal function, and will be asked to respect them. To this end, Gi Group Holding organises appropriate training courses and requests that all Recipients ask for all the information they need to interpret the Code of Ethics correctly and apply the regulations contained in it.

APPLICATION OF THE CODE

The observance, interpretation and verification of the principles contained in this Code of Ethics are the responsibility of the Corporate Social Responsibility Team (CSRT), which has its own executive and supervisory powers and is expressly responsible for:

- proposing and validating the updating of the Code of Ethics in relation to legislative changes and the evolution of the business and organization;
- validating Gi Group Holding's Policies directly descended from the contents of the Code of Ethics (so called Global High Level Policies);
- supervising the application and operation of this Code and of the Global High Level Policies related to it;
- supervising the information provided to and training of all Recipients.

Each recipient undertakes to report any behaviour or situation that deviates from the principles of the Code of Ethics. Any situation or behaviour that is in breach of the provisions laid down in this Code, the High Level Global Policies and laws in force, that cannot be solved by the individual or any direct report must be communicated through the online tool [Gi Group Holding Reporting Channel](#), available also on Group websites. Each report will be processed so as to guarantee anonymity and guard against the risk of discrimination towards anyone who reports violations of the Code.

In any case, it is always possible to contact the CSR Team by e-mail at CSRT@gigroup.com, or by post to the address Gi Group CSRT - piazza IV Novembre 5 - Milan).

