

EQUALITY, DIVERSITY & INCLUSION GLOBAL POLICY

Author: Global Corporate Affairs & Compliance	Approved by: Board of Directors of Gi Group Holding S.p.A. on September 26 th , 2022
Reviewed by: CSR Team	Valid from: October 17 th , 2022
Edition no. 0	Date October 17 th , 2022

TABLE OF REVISIONS

Rev. n.	Date	Reason for revision	Pharagraps concerned
00	26/09/2022	First emission	-

TABLE OF CONTENTS

- 01. PURPOSE**
- 02. SCOPE**
- 03. NORMATIVE AND PROCEDURALS REFERENCES**
- 04. TERMS AND DEFINITIONS**
- 05. ROLES AND RESPONSIBILITIES**
- 06. GI GROUP HOLDING'S COMMITMENT**
- 07. IMPLEMENTATION**
- 08. GRIEVANCE AND DISCIPLINARY MEASURES**
- 09. UPDATES AND REVISIONS**

01. PURPOSE

As provided in the Code of Ethics implemented by our Group (hereinafter, the "Gi Group Holding", or just the "Group") everyone in Gi Group Holding is called to consciously act and communicate, 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.

This **Equality, Diversity, and Inclusion Policy** (hereinafter, the "EDI Policy" or just the "Policy") descends directly from our Code of Ethics and represents how the Group pursues its values about the topics of Equality, Diversity and Inclusion.

In this direction, the companies belonging to Gi Group Holding, have embarked on a path that aims to pursue purposes for the benefit of workers, the community, institutions and territories. In particular by promoting, among other things:

- the correct balance between professional and extra professional life of Employees, Candidates and Workers;
- the development of initiatives and tools that favour the evolution of the world of work in an increasingly safe, non-discriminatory, inclusive way and in which equity and meritocracy are guaranteed;
- the dissemination of a culture of "Sustainable Work" for people, organizations and society.

Consistently with its values and principles, Gi Group Holding recognises and respect people diversities and believes that providing equal opportunities, valuing diversity and promoting a culture of inclusion is fundamental to its success.

In this context, Gi Group Holding is committed to encourage Equality, Diversity, and Inclusion (EDI) among its people and to eliminate unlawful discrimination.

The aim is for our people to truly represent all sections of society, and for all Employees to feel respected and allowed to give their best. We aim to create a culture where everyone can reach their full potential, by creating a working and social environment in which individuals can utilise their skills and talents without fear of prejudice or harassment.

Gi Group Holding – in providing services and/or facilities – is also committed against unlawful discrimination of people, workers, candidates, and customers.

Therefore, the purpose of this Policy is:

- to provide **equality**, fairness and respect for all in our employment, whether temporary, part-time or full-time;

- to support at every level the dissemination of a culture based on **mutual respect of diversities** in order to promote the expression of everyone's potential for Gi Group Holding's progress; to oppose and avoid all unlawful discriminations based, for instance, on any **personal characteristic**, – be it, by way of example and not exhaustively, gender, age, nationality/ethnicity, disability, sexual orientation, religion – or on any **organizational characteristic** – such as seniority, Global Organisational Level, professional family and others – (hereinafter, in conjunction, the “**Individual Characteristics**”); and
- to **oppose and avoid** any form of illegal **discrimination** also in the context of relationships with Customers and Suppliers. This includes and applies, for example, to selection processes for all kind of employments, terms and conditions of employment, remuneration and benefits, dealing with grievances and discipline, parental leave, requests for flexible working, promotion, training or other development opportunities, dismissal, redundancy.

02. SCOPE

This Policy is issued by Gi Group Holding S.p.A. (hereinafter even only 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 the “Group’s Companies”).

This Policy applies to Group’s Companies directors, members of boards, all current and potential Group’s Employees (executives, middle managers, white collars, blue collars - collectively defined as “Employees”), Candidates and Workers.

It also applies to all external consultants, contractors, stakeholders and other representatives of the Group’s Companies driving business relationships with Gi Group Holding’s suppliers and partners.

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

This is an high-level policy, which has the aim of clearly state the essential key points for Gi Group Holding regarding EDI principles.

We have chosen to formulate a high-level policy in order to leave each Group’s Company the possibility of expressing local policies and procedures adhering to the specific local labour market and legal context in more detail, but also to allow everyone to recognize themselves in the pillars of this Policy.

Potential similar policies issued or to be issued by Group’s Companies relating to the same topics must be considered second-level policies and must be consistent with the contents described in this Policy.

No policy or procedure within the Group, at any level, can rely on principles other than those established herein regarding EDI.

03. NORMATIVE AND PROCEDURALS REFERENCES

Reference	
ILO Fundamental Conventions and Declarations	<p>The eight ILO Fundamental Conventions and, with specific regard to this Policy:</p> <p>Convention 100 - "Equal Remuneration Convention", 1951</p> <p>Convention 111 - "Convention concerning Discrimination in Respect of Employment and Occupation", 1958</p> <p>Convention 190 - "Violence and Harassment Convention", 2019</p> <p>ILO Declaration on Fundamental Principles and Rights at Work</p>
UN Conventions	<p>"International Convention on the Elimination of All Forms of Racial Discrimination", 1965</p> <p>"Convention on the Elimination of All Forms of Discrimination against Women", 1979</p> <p>"Convention on the Rights of the Child", 1989</p> <p>"Convention on the Rights of Persons with Disabilities", 2006</p>
UN Universal Declarations	<p>UN "Universal Declaration of Human Rights" 1948</p> <p>UN "Declaration on the Elimination of Violence against Women", 1993</p>
UN Global Compact	<p>The Ten Principles of the UN Global Compact and, with specific regard to this Policy:</p> <p>"Human Rights" (Principles 1 and 2)</p> <p>"Labour" (Principles 3, 4, 5 and 6)</p>
EU Charter of Fundamental Rights	<p>"Charter of fundamental rights of the European Union" 2000</p>
Best practices and Guidelines developed by Private International Organizations	<p>International Standard ISO 30415 "Human Resource Management Diversity and Inclusion"</p> <p>UNI/PdR 125:2022 "Guidelines on the management system for gender equality which provides the adoption of specific KPIs (Key Performance Indicator) relating to gender equality policies in organizations"</p>

04. TERMS AND DEFINITIONS

By Equality, Diversity, and Inclusion in this Policy we mean:

EQUALITY

The **right** of individuals or groups **to receive the same treatment in the workplace**, especially in regard to job conditions, equity in opportunities and career progression.

Our **Equality and Equity commitment** refers to the application of fair processes, outcomes practices on the basis of meritocracy and professional competency and fair relational treatment.

Therefore, Gi Group Holding commits to Equality and Equity ensuring that nobody is disadvantaged in favour of someone else on the basis of their Individual Characteristics.

DIVERSITY

All the **similarities and differences that create the uniqueness of each person**, including Individual Characteristics and any other element for potential discrimination.

Our **Diversity commitment** is about recognizing, respecting and including these diversities in the workplace.

INCLUSION

Foster practices and behaviors to ensure that individuals **feel free to be an active part of the organization and its activities**, perceiving nondiscrimination and fairness in outcomes, in formal policies and procedures and in the quality of interpersonal treatment so to raise a real sense of belonging.

Our **Inclusion commitment** is about eliminating factors that discourage or hinder access, permanence and growth in the world of work **for all**.

05. ROLES AND RESPONSIBILITIES

GI GROUP HOLDING AND THE GROUP'S COMPANIES

The Board of Directors, the Chief Executive Officer and all the Top Management of the Parent Company and of each Group's Company play a strategic role in the full implementation of this Policy, ensuring the involvement of all Group's personnel (Employees, Candidates and Workers) and the consistency of their behaviors to the values contained in the Policy.

For the definition and description of corporate roles and related responsibilities assigned for the adoption of this Policy, please refer to "Corporate procedure for the adoption of the Code of Ethic and related high-level global policies " available on Intranet Global.

INDIVIDUAL RESPONSIBILITIES

Everyone at Gi Group Holding has a role to play in supporting the commitment to Equality, Diversity and Inclusion.

Each person within the organization is required to treat all colleagues with dignity and respect, in a fair and non-discriminatory manner.

All Group's personnel (Employees, Candidates and Workers), contractors and representatives have the responsibility to promote Group's EDI initiatives, behave appropriately in the workplace and report any incidents that are inconsistent with the Gi Group Holding's commitment to equal opportunity, Diversity and Inclusion, or which impact on the implementation of this Policy.

Specifically, **managers** of all kinds are responsible as leaders to model appropriate behaviour, make decisions based on merit, and encourage Equality, Diversity and Inclusion in their teams. They are also responsible for implementing, supporting and monitoring the Policy in day to day activities.

They are also responsible for:

- Creating a working environment that is free of all forms of discrimination and harassment and where all members or Employees are treated with dignity, courtesy, and respect.
- Promoting appropriate standards of conduct at all times.
- Taking seriously any complaint or retaliation reported by the Employees and investigating any situation that could be allegedly against the EDI Policy.

In particular:

GLOBAL HR DEPARTMENT

- Provides equal access to career, training, development and promotion opportunities.
- Support Local Functions and Departments relating to cases that cannot be managed independently by the relevant Local Functions and Departments.

LOCAL HR DEPARTMENTS

- Provides advice, support and training on the EDI Policy to the managers of the Companies.
- Provides equal access to career, training, development and promotion opportunities to the employees.
- Reviews internal practices and introduce workplace improvements.
- Guarantees continuous monitoring of KPIs and produces the necessary reporting.
- Examines, investigates and resolves complaints raised in relation to the EDI Policy, applying the appropriate disciplinary measures and involving the CSR Team where necessary.
- Promotes and develops a supportive and inclusive culture based on EDI, ensuring that no retaliatory measures are applied to whistle-blowers.

GLOBAL CORPORATE COMPLIANCE DEPARTMENT

- Defines performance indicators (KPIs) to measure the application of the procedures and the impact of the action taken with respect to the scope of the EDI Policy, both for internal and external stakeholders.
- In collaboration with the Country Management, implements and carries out periodic checks to verify compliance with the EDI Policy (state of the art, effective application of organizational / operational adjustments, any shortcomings in risk management), both regarding HR management and service delivery.

CORPORATE SOCIAL RESPONSIBILITY TEAM (CSRT)

- Analyses, with the utmost seriousness and confidentiality, the reports of possible unlawful conduct that constitute or may constitute a violation or a suspected violation of the EDI Policy, acting according to the procedures pertaining to the CSR Team itself.
- Collects and analyses the annual EDI Reports from the various Group's Companies to monitor local performance indicators, related to the different Stakeholders (employees, candidates, workers, suppliers, ...)
- Takes decisions regarding awareness-raising and involvement initiatives on the issues covered by the EDI Policy, involving the function responsible for their communication and implementation.

LOCAL EDI COMMITTEES

If appointed and active, each local EDI Committee or EDI Team:

- relates to CSR Committee periodically, sharing the contents and results of the local EDI strategy;
- proposes to CSRT the revision of the EDI Policy following new regulations and / or best practices.

06. GI GROUP HOLDING'S COMMITMENTS

Gi Group Holding commits to:

- 01 Encourage and enhance Equality, Diversity, and Inclusion in the workplace** through the adoption of an EDI strategy that creates value for internal Stakeholders (Employees) and for external ones (Candidates and Workers, customers, suppliers and institutions).

It is essential in today's labour market to be promoters of these values from a business perspective and from a progressive increase in awareness of these issues in our sector.

Given the breadth of our field of action – which starts from our Group and extends to the labour market and the society in which we operate – we are aware that **the implementation of our EDI strategy will be an incremental process.**

We count on the support of all our Group's Companies, to allow a constant exchange of best practices that will be made available to all, to constantly improve the processes inherent to the phases of selection, on boarding, performance, training, reward, benefit welfare, communication.

Procedures and specific objectives for the different phases of our HR management and service delivery will be implemented, accordingly to the EDI principles and to the priorities identified by the Top Management of the Parent Company and emerged from the stakeholder engagement.

- 02 Create a working environment free of** mobbing, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where the contributions of all Employees are recognised and valued. This commitment includes training for managers and Employees about their rights and responsibilities under the EDI Policy. Such responsibilities include Employees to help the organisation provide equal opportunities in employment, **and prevent bullying, harassment, victimisation, and unlawful discrimination also through the provision of our services.** All Employees should understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their employment, against Employees, customers, suppliers, Candidates and Workers.

- 03 Respect and value the contribution of each team member** and regard discrimination as not only unlawful and unfair but unacceptable. Gi Group Holding have **zero tolerance** for any form of unlawful discrimination of Employees, potential Employees, Candidates and Workers, regardless of whether they are active or passive. Mobbing, harassment of any nature, victimisation, vilification, or any other offensive behaviour based on any Individual Characteristics or any behaviour likely to humiliate, offend, intimidate, or insult others will not be tolerated.

- 04 Take seriously complaints** of mobbing, harassment, victimisation and unlawful discrimination by Employees, Candidates and Workers, customers, suppliers, visitors, and any other in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. All complaints will be treated in a fair, timely and confidential manner in accordance with the Gi Group Holding Code of Ethics. No individual will suffer retaliation for reporting or participating in the investigation of a genuine complaint made in good faith. Individuals who believe they have been subjected to retaliation may use any of the resources described in **Section 8 to report their concerns**.
- 05 Make opportunities for learning, development, and progress available to all** Employees, Candidates and Workers and any other stakeholder, who will be helped and encouraged to develop their fullest potential, so that their talents and resources can contribute to maximise the efficiency of the organisation. In this way, each person can grasp the meaning and value of work and the need to which it responds, fuelling awareness of one's value as a person and of one's professional skills, pursuing job satisfaction. Gi Group Holding aims to embed EDI principles within our leadership development programmes to encourage managers to include them as part of their leadership activities.
- 06 Base decisions concerning Employees on merit and competencies** apart from any necessary and limited exemptions and exceptions allowed under applicable law. All promotional or growing opportunities will be filled based on achieved outcomes (merit), measured/defined through clear described procedures based on company or job-related objective criteria.
- 07 Actively develop and support initiatives** aimed at eliminating barriers to entry and development **in the labour market** for all, enacting equality and inclusion policies with an impact at cultural and organisational level - such as Equal Employment Opportunities, Equitable Pay, Flexibility and Work Life Balance, among others.
- 08 Review employment practices, processes and procedures** when necessary, to ensure fairness and to update them and the Policy to take account of changes in the law regarding the EDI issues. Gi Group Holding integrates EDI principles into its hiring and talent identification processes, learning and development, performance review, rewarding, and communication procedures.
- 09 Monitor within the limits defined by the Privacy legislation, the indicators relating to the workforce and the working conditions**, to meet the purposes and commitments set out in the EDI Policy. Ensure that measurable objectives for EDI are developed, approved, regularly reviewed and monitored to assess the progress and performance regarding such objectives.

Monitoring will also include assessing how the EDI Policy and any supporting action plan are working in practice, reviewing them annually, in order to understand which actions are required to address any issues and to meet the needs of our Employees, Candidates and Workers and others stakeholders.

07. IMPLEMENTATION

ACTION PLAN

We ensure that EDI Principles are embedded in all of our activities, policies and decisions.

Key to this is our commitment to develop progressively our **EDI strategy**

- designing **procedures** and defining specific **objectives** for the different phases of our HR management and service delivery,
- implementing a **programme** of training activities and initiatives,
- constantly sharing **best practices** with our internal and external Stakeholders

taking into consideration the priorities emerged from stakeholder engagement and expressed by the Top Management of the Parent Company.

TRAINING

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 promotes the knowing of the Code of Ethics and of this Policy.

Each Group's Company plans and manages the training about this Policy. Participation to such training is **mandatory**. The Country HR Department of each Group's Company monitors that all Gi Group Holding Employees actually participate to the planned training.

All Employees are required to take part in EDI training appropriate to their role. New Employees are also required to take EDI training as part of their induction. Information on all related training will be available on our training website (Docebo).

MONITOR AND REPORT EDI INDICATORS

In order to trace our performance regarding the topics of EDI, specific indicators are defined. Measurable objectives are developed and regularly reviewed in regard to such **KPIs to monitor our commitment** as described in this Policy.

The **communication** relating to these indicators is carried out periodically, also in an integrated manner with other social reporting initiatives, in order to present a short report on our performance regarding our implementation of EDI activities.

DEVELOPMENT AND SUPPORT OF EDI INITIATIVES

To promote the values of EDI within the labour market, we commit to support and develop initiatives and events focused on such subjects.

Our aim is to increase awareness of these topics inside and outside our Group, being promoters of a **cultural change within the labour market**.

Internal events could be organized also with the collaboration of external partners as well as external initiatives, respecting the necessary authorization levels, connected to the use of the Brand and its public positioning.

08. 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 been discriminated or treated unequally have the right to file a complaint free from victimisation or fear of retaliation.

Any violations of this Policy may be reported:

- to the **line manager**;
- to the **Country HR department**;
- to the **CSR Team** at the e-mail address CSRT@gigroup.com or by post to the address CSR Team – piazza IV Novembre 5 – Milan - Italy
- through the **Gi Group Holding Reporting Channel** in line with the provisions of the 'Whistleblowing Global Policy'.

Human Resources ensures assistance and support to those who needs to file a complaint.

We aim to support and protect anyone who files a complaint, or who acts as a witness, under these procedures from victimisation or retaliation.

Any breach will be prosecuted with the application of appropriate and proportionate disciplinary sanctions, also taking into account any criminal relevance of the conduct.

09. UPDATES AND REVISIONS

This Procedure may be integrated and / or updated by the Corporate Compliance Department, after consultation with the CSR Team at any time, including following changes and / or additions to the relevant legislation.