

GI
GROUP
CODE
OF
ETHICS

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Group
YOUR JOB, OUR WORK

SUMMARY

1_ FOREWORD	3
2_ COMPANY MISSION AND CORE VALUES	4
3_ GENERAL PRINCIPLES OF CONDUCT TOWARDS STAKEHOLDERS	7
4_ IMPLEMENTATION AND CONTROL	10

FOREWORD

1_FOREWORD

The 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” encoded 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 International Confederation of Private Employment Agencies, Gi Group SpA has adopted the CIETT Code of Conduct and identifies with the OECD Guidelines for Multinational enterprises that “provide principles and standards of good practice consistent with applicable laws and standards recognized on an international level”.

Within this framework, this Code of Ethics sets out the values and principles that the Group (hereinafter “Gi Group”) has decided to adopt in conducting its business and in its dealings with all its Stakeholders. This Code now forms an integral part of Gi Group’s Corporate Governance policy. This document is issued and endorsed by the Parent Company and is to be adopted by all the Companies in the Network, to share formally and incorporate in to their own policies and training schemes.

Its guidelines and the principles expressed in it are to be incorporated alongside any local policies or codes adopted by individual Group companies or imposed on them by local regulations.

The Code of Ethics is a compulsory point of reference around which collaborators and employees – from the Group’s directors and managers down – must orient their daily work, their actions and interpersonal relations within the company and towards society and the market. Under no circumstances shall the belief that they are pursuing the interests and objectives of the Company to which they belong justify violation of the Code of Ethics, which will have priority over any other inhouse regulations, procedures and contractual relationships that conflict with it.

Gi Group is confident that its Stakeholders identify with the values on which the Code of Ethics is based, share and apply them as the basis for business behaviour guided by the principles of integrity, loyalty, honesty, transparency and respect for the rules and the law.

COMPANY MISSION AND CORE VALUES

2_COMPANY MISSION AND CORE VALUES

2.1_MISSION

Through its services, Gi Group intends to contribute as a protagonist on the worldwide stage to the evolution of the labour market and the education of all on the personal and social value of work.

2.2_VALUES

The work of each individual Company in the Group is based on a set of values consistent with Gi Group's approach to the labour market and the civil society in which it operates.

Work

"Through our work, we endeavor to contribute to the efforts that everybody makes to build an initial happiness".

Gi Group conceives work as a means for people to fulfill themselves, realise their desires and to participate in the creation of a greater 'wellbeing' that can endure into the future: this is why the work done by Gi Group is oriented towards the creation of work opportunities that allow people to experience a future that corresponds to their needs and expectations and abides by the principles of equality, impartiality, the protection of personal dignity and safety and against all forms of discrimination and illegality which allow companies to choose, develop and manage the best Candidates according to their needs.

Responsibility

Gi Group is well aware of the public and social role of its mission: as a multinational labour company it is influential in establishing new and better rules for the development of the market and local communities, importing and exporting global best practices.

It is also aware of the fact that the 'wellbeing' it intends to promote through its daily activities falls within the individual responsibility of the company's staff.

The companies in the Group and all its employees and collaborators are therefore called on to take responsibility for supporting:

- n universally recognised human rights, and actively safeguarding them;
- n the laws of the countries where the Group operates, resisting all forms of abuse and corruption;
- n the legislation that regulates workplace health and safety, spreading its culture and adopting the most effective preventative measures;

- n the environment, by sustaining the very latest initiatives, technologies and practices aimed at its protection.

Care

Gi Group encourage its employees and representatives to pursue their work mission is by performing their tasks 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, the principle on which the activities of Gi Group are based is represented by the dual priorities of:

- n the Customers: including both Companies and Candidates: to satisfy their specific needs with ad hoc tools and services, by offering effective, targeted and long-lasting solutions that create value;
- n the People: to strengthen the recognition of their value and the awareness of the great importance that work has for them, welcoming and taking care of them with the conviction that the Company can play an educational role in their lives.

Economic Efficiency

Gi Group believes that a company's ability to maintain its conditions of balance and performance in the market is an indispensable factor for healthy business, for satisfying the needs and achieving the objectives of the Stakeholders.

It must combine business continuity with excellent service and it is not to be understood as the ultimate aim of the activity but as a means of promoting the organisation, its employees and the economic and social fabric in which the Company operates. It should be pursued with absolute respect for the laws and in accordance with the principle of free, regulated and fair competition.

Continuous Learning and Innovation

Gi Group is convinced that continuous learning and the encouragement of innovation represent necessary conditions for doing a better job and sustaining business continuity, by creating new solutions that adapt to the changes in the economic and social conditions - for the benefit of all Stakeholders. In fact, Gi Group staff feel that they are at the service of their environment and not vice versa, and, for this reason, they put themselves at the disposal of Workers, Candidates, Companies and Institutions, sharing their expertise through professionalism in their daily work.

Gi Group undertakes to develop the capabilities and skills of its management and employees to allow the energy and creativity of each individual to be expressed fully so that he can realise his potential.

Team Spirit

Gi Group believes that people are a fundamental resource for an organization based upon inter-personal relations, and that team work and deep involvement in the company's Mission are essential to achieving it.

Perceiving the company's values and mission as being in line with one's own vision of work means, for the individual, switching from a passive to a proactive role: everyone at Gi Group is expected to establish a positive relationship with their colleagues and bosses, to exchange views on work con-

ditions and make proposals for improving the company's products and processes that create value for all parties.

In fact, the exchange of views must characterise not only relationships between colleagues, but also relationships with all other Stakeholders, to promote an atmosphere in which the dignity, honour and reputation of each individual can be maintained.

GENERAL PRINCIPLES OF CONDUCT TOWARDS STAKEHOLDERS

3 GENERAL PRINCIPLES OF CONDUCT TOWARDS STAKEHOLDERS

Gi Group bases its actions on strong ethical principles, supported by a clear assumption of individual responsibility, as a way of encouraging, in everyone that works at Gi Group – in particular in 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: Workers, Candidates, Customer Companies, Institutions, Local Communities, Suppliers, Competitors and any other economic or social stakeholder within the labour market.

In line with the structure of its policy on Corporate Social Responsibility, Gi Group requests its 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 their work with the principles included in the Code.

Legality

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

- n the free association of workers and the right to collective bargaining;
- n the elimination of all forms of forced and compulsory labour, and the effective abolition of child labour;
- n the elimination of all forms of discrimination in employment and the professions;
- n the respect of all laws that regulate the labour market in relation to disciplinary procedures, working hours and pay, workplace health and safety;
- n 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 Administrative Authorities, including the exchange of money, favours 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 bases its activities on the principle of fairness, in order to maintain a constant balance between the particular and general interests of the individual and the Company, Customer and Supplier.

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

- n 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;
- n in its dealings with People, towards whom no prejudice or unfair treatment is permitted and working conditions that favour the development of the individual's personality and professionalism are promoted;
- n in its relationships with Customers, in order to be able to provide services of an increasingly high quality, taking account of their particular requirements;
- n in its dealings with Suppliers, in which Gi Group does not intend to deny anyone that meets its criteria the possibility of winning contracts, opposing any practices that induce Suppliers to enter a contract that is unfavourable for them.

Confidentiality

Gi Group safeguards the privacy of all Stakeholders and the secrecy of the information and personal data in its possession: all the personal data collecting, filling and processing operations may only be performed by operators expressly authorised to process them under the direct authority of the owner or controller and they are obliged not to use any information for any purposes other than those associated with the company's business.

Considering the sensitive nature of the information and documents handled (including CVs, payslips, sales and work contracts, corporate environment investigations, head hunting activities, outplacement processes, ...), everyone who works at or on behalf of Gi Group undertakes to respect the strictest privacy procedures that protect the Worker, the Customer and the other Stakeholders concerned.

Honesty

Gi Group affirms that honesty is an indispensable condition for obtaining credibility and establishing with all Stakeholders relationships based on trust that help to improve the operation, image and reputation of the sector.

Honest and efficient business management must characterise the work of the company representatives on all levels, inside and outside the company:

- n in accordance with a concept of the market founded on the respect of people, free initiative and regulated competition, for the mutual benefit of the whole of society;
- n always acting in respect for the Company's physical property, but also its commercial and intellectual property.

Transparency

Gi Group bases its actions, communications and provision and collection of information on the principle of transparency, emphasising the value of winning the trust of our internal and external Stakeholders.

Transparency represents a principle of conduct, in particular:

- n with respect to company management and contractual relationships with Customers, Suppliers, Candidates and Workers, which must be fair, clear and traceable;
- n 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 passed to Candidates or Workers;
- n with respect to the communication of information about the Company to the outside world, which must also be truthful, simple, comprehensible, prompt and accessible to everyone.

Safety

Gi Group undertakes to fulfill all its legal obligations on Hygiene, Health and Safety, starting from a careful risk assessment so as to ensure effective work safety, in particular for employees and temporary workers.

Workers are required not only to take the utmost care to respect the rules and scrupulously follow the specific work procedures related to their jobs but also to undertake the commitment to positively influence their colleagues in relation to safe conduct, acting as promoters of the workplace safety culture.

For Gi Group this means ensuring good working conditions, both by protecting the worker's psycho-physical wellbeing and in respect of his dignity, taking action to prevent offensive, discriminatory or slanderous interpersonal attitudes and strictly prohibiting conduct that constitutes physical or emotional aggression, harassment, mobbing or bullying.

Sustainability

Gi Group develops its activities in respect of all environmental protection laws and standards, with the awareness that all Companies, irrespective of their core business, are called on to implement good consumer practices that guarantee a balance between the use of natural resources and their regeneration.

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 and encourages its employees and suppliers to work in accordance with this principle.

IMPLEMENTATION AND CONTROL

4_IMPLEMENTATION AND CONTROL

4.1_RECIPIENTS OF THE CODE

The Recipients of this Code are:

- n the members of the decision-making and supervisory bodies of the Companies in the Group, the managers and employees that belong to the organisational structures;
- n Workers on temporary contracts;
- n 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 (Suppliers, Customers, Institutions ...).

4.2_DISCLOSURE AND KNOWLEDGE OF THE CODE

It is in Gi Group'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 to the values, principles and objectives contained in the Code of Ethics.

All Recipients and, as far as applicable, also the 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.

To this end, Gi Group 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.

4.3_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:

- n supervising the application and operation of this Code;
- n supervising the information provided to and training of all Recipients;
- n proposing continuing education on legislative changes and the evolution of the business and organisation.

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 in-house procedures and laws in force, that cannot be solved by the individual or his direct boss must be communicated to the CSRT (by e-mail to the e-mail address CSRT@gigroup.com or by post to the address Gi Group CSRT - piazza IV Novembre 5 - Milano).

The CSRT will ensure maximum confidentiality in processing the reports so as to guarantee anonymity and guard against the risk of discrimination towards anyone who reports violations of the Code; the CSRT will examine every report, proposing that the company managers concerned take the relevant measures.