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Aware that the reference market requires increasing quality and social responsibility services, Eurointerim S.p.A. has defined an Integrated Management System Policy (ISO 9001 and SA 8000), which outlines the ways to achieve the established commitments and objectives.

Since the Integrated Management System Policy must be comprehended, actualised and maintained by staff at all levels, the Governing Body undertakes to guide the corporate strategy towards quality and social responsibility, employing the entire company for this purpose, and applying the appropriate training and information tools at all levels.

The Management has defined its integrated management system, beginning with the definition of two essential documents:

- DGA-01-2 Stakeholders
- DGA-01-1 CONTEXT ANALYSIS– SWOT.

Among the main objectives of the Company is the precise monitoring of non-conformities in all corporate process phases, especially those that are possibly connected to complaints from all stakeholders; moreover, the Company aims at ongoing improvement to achieve their continuous fulfilment.

As the Company intends to establish itself, against its Competitors, as one of the best companies in the Sector, it means to pursue the development of a business model capable of complying with:

- Standards, laws, directives and regulations concerning quality, ethics, environment and safety;
- Requirements of the client;
- Human relations with internal and external staff.

This Policy, in accordance with the Code of Ethics referred to in the Organisational Model Legislative Decree 231/01, and with the results of the SWOT Analysis and the assessment of the relevant requirements of the relevant stakeholders (referred to in the DGA-01-1 and DGA-01-2 documents), is based on a set of principles to which specific strategies and objectives refer.

1. COMPLIANCE WITH THE REQUIREMENTS OF THE CLIENT AND TO THOSE EXPRESSED BY THE RELEVANT STAKEHOLDERS

This principle signifies:


- Guaranteeing compliance with contractual, technical and qualitative requirements, including binding ones at all levels;
- Increasing the satisfaction of client companies and leased workers, specifically in terms of:

ON THE CLIENT'S SIDE

- Quality/price ratio adequacy of the service offered
- Increase effectiveness and efficiency in the Search and Selection process (time reduction)
- Solutions for the needs of contractual Flexibility (hiring) with timeliness and adequacy in the technical-commercial responses.

ON THE LEASED WORKERS' SIDE

- Receive timely and precise information and requisites on the job offers (advertisements)
- Transparency and clarity in the description of the work positions offered (job offer)
- Compliance with the applied CLA (legislation and economic part) and laws (employment contract). Payment of salary.
- Developing and optimising processes and know-how.

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2. TRAINING OF HUMAN RESOURCES

The area concerning the training of human resources employed, forms the base to achieve the objectives of the corporate management system and signifies:

- Strengthening the level of skill, professionalism, involvement and motivation of the employees;
- Promoting the cultural growth of the company and researching the cause of the issues that occur;
- Introduce and train young staff to stay competitive, also in the future;
- Make adequate resources (structures, means, systems, equipment and devices) available with effective investment management;
- Ensuring a high level of maintenance, safety and reliability of the means available;
- Guaranteeing a pleasant working environment;
- Maintaining the level of supplier performance high.

3. SOCIAL RESPONSIBILITY

Aware of the importance to implement a social responsibility system, defined in accordance with the parameters of the SA8000 standard, Eurointerim S.p.A. has decided to comply with the standard by involving the workers and stakeholders.

Aware of his role and responsibilities within the economic and social community, the President of Eurointerim S.p.A., undertakes to guarantee that all activities of the organisation are carried out in compliance with the requirements of the SA8000 standard and of national laws in force and applicable to its business sector, as well as the provisions contained in the official international documents and their interpretations (ILO Conventions, Recommendations, Conventions/Guiding Principles of the United Nations on the topic of discrimination and human rights) concerning:

Child Labour

Ensure adequate protection for minors; an essential principle being not hiring children or encouraging the employment of child labour except within youth training programs approved by authorities. To this end, all the most relevant company staff, clients and suppliers are informed.


Forced or Compulsory Labour

Require that all employees are hired in the company upon their own free will; do not apply any form of coercion to hire staff and do not support any type of forced or compulsory labour.

Health and Safety

Provide a clean and safe working environment; arrange preventive measures to reduce the risks of accidents or injuries caused by work activities, minimising as much as possible, the causes of risks connected to the work environment and providing appropriate regular risk assessments.

Fornire al personale adeguata formazione periodica ed efficace su salute e sicurezza incluse le istruzioni specifiche alla mansione svolta.

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Freedom of Association and Right to Collective Bargaining

Respect the right of all the staff to form trade union organisations of their choice, to adhere and bargain collectively. Ensure that the staff representatives (where appointed) are not subject to discrimination and have access to their members in the workplace.

Discrimination

Offer equal opportunities to all employees and do not implement or encourage discrimination in hiring, in the salary, in the access to training, in career development, in retirement, based on ethnic origin, nationality, social status, religion, physical disability, gender, age, sexual orientation, membership of trade union organisations or political affiliation.

Disciplinary Practices

Do not implement or support any type of physical or mental coercion, any verbal abuse, form of corporal punishment or through assigning heavy work; do not allow any behaviour, including gestures, language and physical contact, which implies coercion, threat, abuse or exploitation. Develop and maintain fair procedures to manage employee reports and disciplinary practices.

Working Hours

Guarantee your staff working hours that comply and are adequate with legislation in force on the matter and with industry standard; do not request non-voluntary overtime, or in any case, exceeding 12 hours per week (except to respond to market demands).

Salary

Ensure salaries are equal or higher than the statutory or contractual minimum wage and are always sufficient to meet basic needs and provide additional income.

Guarantee your staff adequate pay for the duties covered, impeding "undeclared work" in every way possible. The indications of the CLA are followed for this purpose, and if possible, the salaries paid to employees are higher than it. Pay overtime with an increase, according to the indications of the CLA of reference.


Ensure no false apprenticeship agreements are adopted with the aim of relieving Eurointerim S.p.A. from the obligations set by laws and regulations on the topic of labour and social security.

Ethical training

Implement an adequate training program for all the staff on the theme of Social Responsibility, which takes risk assessment into account.

Managing suppliers

Establish and maintain appropriate procedures to evaluate and select the main suppliers and sub-suppliers, based on their ability to meet Eurointerim S.p.A. standards on policy and social principles and reasonably demonstrate that these standards are constantly met. Evaluation questionnaires are sent to suppliers for this purpose, and audits are carried out where necessary.

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Monitoring and Improvement

Monitor the implementation of the SA8000 standard policies and requirements, by adopting adequate treatment/corrective and/or preventive actions for the findings.

Provide suitable tools aimed at involving the stakeholders.

Give visibility to the actions undertaken on the theme of social Responsibility, ensuring the

accessibility to the Integrated Management System to the stakeholders.

Define new measurable and quantifiable objectives for Social Responsibility, with a view to continuously improving performance.

4. STRATEGY


Strategy is focused on:

- Defining measurable and comparable objectives and targets, with related indicators, considering the aspects on quality, ethics, safety and the environment in every action and decision taken, pursuing continuously improving performance;
- Promoting problem solving and preventive measures;
- Consolidating the corporate structure and size;
- Assisting branches to allow them to sell the services subject to certification, effectively and efficiently;
- Developing new contacts with local structures;
- Producing satisfactory economic results for shareholders;
- Strengthening information activities aimed at clients;
- Perfecting the information system by combining data security with accessibility and availability of that data;
- Improving the work planning to progressively reduce urgently carried out activities;
- Improving internal communication flows by optimising the corporate organisation;
- Continuously supporting the crime prevention organisational model (pursuant to Legislative Decree 231/01) and the principles in the code of ethics;
- Maintaining the acquired marginality, dedicating a part of it for investments aimed at improving competition at all levels;
- Activating effective accident and injury prevention measures and limit the harmful consequences for the environment and safety by adopting the best economically sustainable techniques available.

5. INVOLVEMENT OF STAFF AND SUPPLIERS

The involvement of the parties foresees:

- Raising awareness about the commitments of this Policy;
- Motivating staff, also through training courses, until a sense of responsibility towards quality, ethics, safety and environment has been achieved at all levels;
- Improving internal organisation, especially the interfaces between the various functions, to improve the efficiency and effectiveness of company processes;
- Involving staff in the company objectives and processes;
- Creating loyalty with the current supplier base;

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6.COMPLAINTS AND REPORTS

How to forward a complaint:

- Deliver by hand into the complaints and reports box available both in the headquarters of Padova and in the individual branches throughout the country;
- Through the company website at the following link:
www.eurointerim.it/segnalazioni/;
- By fax to the following number: +39 049 89 35 068
- By mail to the following address: Eurointerim S.p.A. – Viale dell'Industria, 60 – 35129 Padova

Should the interested party not feel suitably represented and protected by the descriptions provided by the Integrated Management System, they have the right to directly contact:

- ISO9001 Certification Body:
 - o CSI Spa Sistema CSICERT
 - o Viale Lombardia, 20/B – 20021 Bollate (MI)
 - o Fax: +39 02 3503940
 - o E-mail: info@csi-spa.com
- ISO9001 Accreditation Body:
 - o Accredia – DIPARTIMENTO CERTIFICAZIONE E ISPEZIONE
 - o Via Tonale, 26 - 20125 Milano
 - o Fax: +39 02 21009637
 - o E-mail: milano@accredia.it
- SA8000 Certification Body:
 - o Bureau Veritas Italia Spa
 - o Divisione Certificazione – For the Attention of the CSR Manager
 - o Viale Monza 347 – 20126 Milano
 - o Fax: +39 02 2552980
 - o E-mail: csr@it.bureauveritas.com
- SA8000 Accreditation Body:
 - o SAAS Social Accountability Accreditation Services - 15 West 44th Street, 6th Floor
New York, NY 10036
 - o Fax: (212) 684-1515
 - o E-mail: saas@saasaccreditation.org

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7.CONCLUSIONS

The BoD has identified and maintains the function of Management Representative (MR) for the integrated management system conferring the authority and means for implementing the System to Giovanni Corradin.

The BoD promotes the improvement and development of the Integrated Management System and will strive until the principles in the company documents are disclosed, comprehended and shared by all employees and co-workers.

This document has been disseminated to all levels of the organisation through training meetings, publication on the corporate website and display throughout the premises, to ensure it is comprehended by all the staff.

Based on the general principles set out below, measurable objectives have been defined in more detailed documents that are monitored during the yearly reviews by the Management of the company, to continuously improve the effectiveness of the integrated management system and verify the adequacy of the general principles described in this document.

Finally, during the periodic reviews by the Management, the MR will verify that this Policy is made available, disseminated, maintained and is in a correct state of validity and adequacy to the business strategies.

Padova, 21 October 2019

Chairman of the Board

