

Procedure for selection, recruitment and employment of staff.

1 Preamble.

The process of staff selection and recruitment is considered a very important activity since, for Marsilli, the human factor is a strategic asset on which its ambitions for growth and market leadership in a context of economic, social and environmental sustainability are built on. Selecting and recruiting people suitable for jobs in the corporate organizational system is the right premise for a path of growth that can satisfy both business needs and workers needs for integration and satisfaction. For this reason Marsilli, in line with what was already expressed in its internal and public documents showing its commitment to the universal principals aimed at protecting the rights of individuals, prohibiting any discrimination, promoting their inclusion and rewarding their commitment and professional skills, within the limits of their individual abilities and aspirations, deems appropriate to encourage these principles by including them to this procedure with the aim of providing the governing bodies involved in the activities of selection and recruiting with a precise operational reference intended to ensure observation and application of these principles in the practice of staff selection and recruitment.

2 Aim of the procedure.

This procedure has the aim of guaranteeing the application of the following principles within the processes of staff selection and recruitment:

- elimination of child and forced labour and human trafficking;
- elimination of all discrimination based on gender, race, religion, colour, political or trade union views, philosophical beliefs, sexual orientation, language and nationality;
- promotion of selection criteria based on candidates' suitability based on the knowledge, experience and skills necessary for the tasks to be performed and/or the organisational role to be filled;
- promotion of equal economic and contractual treatment;
- free employment.

3 Internal regulatory framework.

This Procedure is based on and implements principles established and in the following documents already adopted:

- Marsilli Code of Ethics.
- Labour, safety and human rights policy.

4 Recipients and field of application

This Procedure is addressed to all the companies of the Marsilli Group. The recipients are their highest Administrative bodies and more specifically, HR Management and the personnel that is responsible for staff selection and recruitment.

5 Procedure for selection and recruitment of personnel.

This Procedure consists of the following stages:

- Advertising the job.
- Collection of applications.
- Selection of suitable candidates for the position/task.
- Presentation of applications to the target functions and selection of candidates to be recruited.
- Definition of the contractual agreement with the selected candidates.

The principles mentioned in Point 2 must be strictly adhered to while carrying out each of the stages listed above. The relevant operational details are provided in the following paragraphs.

5.1 ELIMINATION OF CHILD AND FORCED LABOUR AND HUMAN TRAFFICKING.

5.1.1 Definition of child labour.

Child labour is defined as work performed by young people who, according to the applicable law of the country where they work, are under the legal age.

5.1.1.1 Prohibitions on the use of child labour.

Use of child labour is prohibited. Therefore, it is forbidden to recruit, for any reason, young people who are under the legal age, as stated above.

5.1.1.2 Derogations from the ban on the use of child labour.

The ban in the preceding paragraph may be waived in the following cases:

- integration of young trainees in order to provide them with work experience consistent with their course of study;
- integration of young people who have completed their studies and reach the legal age by the year of their employment.

5.1.2 Definition of forced labour.

ILO Forced Labour Convention, 1930 (No. 29) defines forced labour as: “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself [or herself] voluntarily”.

5.1.2.1 Prohibitions on the use of forced labour.

Use of forced labour is prohibited. Therefore, it is prohibited to recruit and employ, in any form and capacity, workers who have not volunteered or whose services are obtained through threats.

5.1.3 Definition of human trafficking.

Human trafficking is defined as the act of transporting, exploiting and trafficking people through deception and coercion thus constituting a state of slavery.

5.1.3.1 Prohibition of human trafficking.

Involvement, in any form or capacity, in activities directly or indirectly related to human trafficking, as defined above, is prohibited.

5.2 DISCRIMINATION DURING SELECTION AND RECRUITMENT STAGES.

5.2.1 Prohibitions.

In all stages of the personnel selection and recruitment process, regardless of the tasks to which the selection is directed, the types of contract offered, the roles to be filled, etc., it is strictly prohibited to apply principles that discriminate against applicants based on the following differences:

- gender;
- ethnicity;
- religion;
- colour;
- political opinions;
- trade union beliefs;
- philosophical beliefs;
- sexual orientation;
- language;
- nationality.

5.2.2 Criteria to be adopted.

Criteria aimed at maximum respect of the candidate must be adopted during all stages of selection and recruitment process, taking care to protect his/her dignity as well as his/her privacy. Applications must be selected and chosen on the basis of their suitability for knowledge, experience and skills required for the tasks to be performed and/or the organisational roles to be filled.

5.3 EQUAL ECONOMIC AND CONTRACTUAL TREATMENT.

5.3.1 Prohibitions.

During the stages of recruitment of personnel, regardless of the types of tasks to which the selection is orientated, the types of contract offered, the roles to be filled, etc., it is strictly prohibited to offer candidates economic and contractual treatment based on the following differences:

- gender;
- ethnicity;
- religion;
- colour;
- political opinions;
- trade union beliefs;
- philosophical beliefs;
- sexual orientation;
- language;
- nationality.

5.3.2 Criteria to be adopted.

Criteria aimed at maximum respect of the candidate must be adopted during all stages of selection and recruitment process, taking care to protect his/her dignity as well as his/her privacy. Economic, contractual and carrier proposals must be made solely on the basis of the workers' suitability with respect to the knowledge, experience, skills, personal inclinations and attitudes required for the tasks to be performed and/or the roles to be filled.

5.4 FREE EMPLOYMENT.

5.4.1 Prohibitions.

It is absolutely forbidden to charge costs or other fees to applicants during the selection or recruitment of personnel, for any reason.

5.4.2 Criteria to be adopted.

Applicants can participate in the selection stages for free. Upon agreement with the applicant, Marsilli can bear any travel, board and lodging costs incurred by the applicant during these stages. Acceptance of job applications cannot be made contingent on applicants being charged any fees or costs.

6 Remedial actions in case of violations.

Any violations to the principles expressed in Paragraph 5 entail the removal of the case as prohibited by this Procedure and the implementation of appropriate actions aimed at prosecuting the perpetrators and protecting the victims. To this end, actions to remedy the specific violations are set forth below.

6.1.1 Child labour.

Given that child labour is legally prohibited and prosecuted; given that the absence of under-aged people in working activities is ensured by the control of workers' personal documents when signing of the labour contract, for employees, or when entering the workplace, for non-employed workers; if, for any reason, under-aged people are found in the work activities and their presence is not ascribable to the provisions of paragraph 5.1.1.2, they must be immediately removed from the workplace and parents or legal guardians must be contacted and informed. Relevant authorities are also to be informed, so that these minors can be reintegrated into the training path provided by the law of the place of work.

6.1.2 Forced labour.

Given that forced labour is legally prohibited and prosecuted, if, during the work activity, conditions attributable to the definition of forced labour in paragraph 5.1.2.1 are to be found, such conditions must be immediately removed through investigation aimed at shedding light on the causes and subjects involved to restore normal working conditions. Workers who are victims of these abuses must receive supported in their return to work so that their normal mental and physical well-being is restored if necessary. Abusers and those who have failed to report the incident after becoming aware of it will be subject to disciplinary action and, if applicable, the actions attributable to them must be reported to the relevant authorities.

6.1.3 Human trafficking

Given that human trafficking is legally prohibited and prosecuted, if, during the work activity, conditions attributable to the definition of human trafficking in paragraph 5.1.3.1 are to be found, such conditions must be immediately reported to the relevant authorities. Abusers and those who have failed to report the incident after becoming aware of it will be subject to disciplinary action. Workers who are victims of these abuses must receive support so that, in cooperation with the relevant authorities, they can be offered regular reintegration into work, if possible.

6.1.4 Discrimination in selection and recruitment stages.

Should discriminatory behaviour as indicated in paragraph 5.2.2 be observed in the stages of personnel selection and recruitment, abusers and those who have failed to report the incident after becoming aware of it will be subject to disciplinary action. Applicants who are victims of these abuses must be made aware of the discrimination suffered and the disciplinary action taken against the abusers.

6.1.5 Equal economic and contractual treatment.

Should discriminatory behaviour as indicated in paragraph 5.3.2 be observed in the stages of personnel recruitment, abusers and those who have failed to report the incident after becoming aware of it will be subject to disciplinary action. Applicants who are victims of these abuses must be made aware of the discrimination suffered and the disciplinary action taken against the abusers. Economic and contractual treatment deemed discriminatory must be eliminated.

6.1.6 Free employment.

Should discriminatory behaviour that violate the principles set forth in paragraph 5.4 be observed in the stages of personnel recruitment, abusers and those who have failed to report the incident after becoming aware of it will be subject to disciplinary action. Applicant who are victims of these abuses must be made aware of them and refunded.

7 Implementation and supervision.

Implementation of the Procedure is delegated to the Management of the individual companies that are part of the Group, in the persons at the various hierarchical levels that make them up. The supervision of compliance of this Procedure is entrusted, for Italian companies, to the Supervisory Body of individual companies, where present, while for the non-Italian, or without Supervisory Body, this function is performed by their highest administrative body or by another specifically appointed supervisory body. Anyone is authorized to report violations of this Procedure that they become aware of. For Italian companies, the reports will be addresses to the Supervisory Bodies of the individual companies, where present, while for non-italian ones, or those without a Supervisory Body, the reports will be sent to Supervisory Body of Marsilli S.p.A. The competent Supervisory Body is responsible for investigating the vacity of the report, listening, if necessary, to the reasons of the reporting person and the person responsible of the reported violation and to report on the matter according to what is defined in the operating regulations of the Supervisory Body itself. For non Italian companies or for those without a Supervisory Body, this function is preformed by the highest administrative body or by another control body specifically appointed, on impulse from the Supervisory Body of Marsilli S.p.A.