

HUMAN RESOURCES MANAGEMENT POLICY

POL02 - rev00 dated 23.03.2021

I. GENERAL PRINCIPLES

People are a fundamental asset, as well as an indispensable prerequisite for the competitiveness of Focaccia Group, which is why the Human Resources Management Policy is based on a number of essential general principles

SUSTAINABILITY

Focaccia Group is committed to enhancing growth and sustainability in its Human Resources Management Policies, which enhance and protect reputation, credibility and consensus over time. These are prerequisites for business development aimed at creating and protecting value for all stakeholders. They are aimed at seeking the creation of long-term sustainable value.

HUMAN RIGHTS

Respect for human rights is a prerequisite for sustainability. For this reason, it protects and promotes these rights in the conduct of its activities, including in relations with its resources. Respect for the personality and dignity of each employee is fundamental to the development of a working environment inspired by mutual trust and loyalty, in compliance with the legal obligations in force in each geographical context and sphere of activity in which it operates.

Focaccia Group is committed to promoting an ethical culture based on the values of fairness, professionalism, customer protection and responsibility. Adhering to these values means honouring the trust placed in the Group and preserving its excellence. Specifically, personnel, in the performance of their work, must behave in a manner consistent with the duties associated with the tasks and activities entrusted to them and strongly oriented towards ethics and integrity. Each employee is obliged to maintain a conduct that does not conflict with the duties associated with their inclusion in the company organisation.

DIGNITY AND FREEDOM

Focaccia Group values its personnel on a meritocratic basis, develops their professional skills according to the principle of equal opportunities and in line with its strategic choices, organisational and production requirements, taking into account the training needs of employees.

Professional development is also achieved through appropriate training, practical work experience guided by managers, possible mobility to different positions, performance appraisal, career advancement and promotions.

EQUALITY AND INCLUSION

Focaccia Group considers gender and thought diversity an element to be valued as a source of cultural and professional enrichment. The Group believes in the importance of valuing different perspectives and experiences through an inclusive culture, in which diversity and personal and cultural perspectives are respected and considered a key success factor.

No distinction may be made with specific reference to the following areas: access to employment, assignment of tasks and qualifications, transfers, disciplinary measures, promotion and professional training (including professional and career progression) working conditions (including pay, supplementary pension schemes, benefits).

It ensures that all employees are treated without distinction, exclusion, restriction or preference, whether direct or indirect, based on age, gender, sexual orientation, marital status, religion, language, ethnic or national origin, physical or mental disability, maternity or paternity status, including of adoptive parents, personal beliefs, political opinions, trade union affiliation or activity.

Focaccia Group also safeguards the right and freedom of association and collective bargaining. The National Collective Bargaining Agreement for the sector covers all employees in Italy and defines the minimum period of discussion with the

trade unions for the implementation of major organisational changes.

HEALTH AND SAFETY

Focaccia Group guarantees high standards of health and safety at work, raising awareness of risks and promoting responsible behaviour, including through information and training activities. Health protection and psychological and physical well-being are recognised by adopting specific prevention and protection programmes, making all company levels responsible.

CONFIDENTIALITY AND PRIVACY

Every resource must maintain the strictest confidentiality when it comes to Focaccia Group's business and customer information. All information concerning employees is processed in compliance with legal provisions and confidentiality obligations and in such a way as to ensure that only those directly concerned and authorised persons have access to it.

2. HUMAN RESOURCES INTERNAL MANAGEMENT PROCE-DURES

Personnel management is generally governed by internal regulations concerning the company's many activities and processes relating to human resources, with the associated information flows.

In general, they contribute to the professional enhancement of resources by taking advantage of their personal characteristics:

- the quality of the skills acquired and the performance over time, any previous employment outside the company;
- the internal path led by their managers, learning by doing, professional and managerial training;
- mastery of the role, the individual's aptitudes and potential duly assessed;
- compliance with the rules included in the Corporate Rules and Regulations in order to ensure conduct in line with industry norms and practices in order to best serve the interests of customers.

3. PERSONNEL SELECTION

The selection process is based on the approval of a resource insertion plan consistent with the annual budget, the definition of the profiles being sought, the conduction of a number of interviews by both the human resources function and the heads of the organisational units involved in recruitment and, for more specific roles, also by the management.

Each selection process encourages the application of all individuals with the required qualifications and/or professional experience and is carried out solely on the basis of merit. The same principle underlies the assessment of opportunities that may open up within the company.

The selection is based on the evaluation of the knowledge acquired during the training period, of the professional and technical skills that may have already been developed and as evidenced by the curriculum vitae and the company's track record. Basic, cognitive, interpersonal and achievement skills are assessed, as well as the potential that emerged in the selection process for younger figures. For more senior figures, key leadership competencies are assessed including vision and strategic thinking with regard to the business and/or the activities supervised, all related risks, and the implementation of decisions taken, results and customer orientation, adapting reference processes, managerial and organisational competencies to enhance employees and teamwork, optimise talent, value diversity, identify opportunities for change, and cultivate leadership, authority and credibility.

The human resources department takes care to verify that the job profile applied for is free of any discriminatory element. In addition, it is ensured that all processes of the chosen external selection companies also respect the principles of non-discrimination and inclusion. Gender balance is maintained in the collection and screening of CVs, based on the actual availability of candidates in the labour market. In the context of the interviews, it is ensured that candidates are not asked questions that could be a source of discrimination. The objective of gender pay equity is pursued in the definition of the economic offer.

The company's selection process, therefore, requires each recruitment decision to involve several actors and be made jointly by the relevant human resources function and the heads of the offices involved in the recruitment itself.

4. RESOURCE MANAGEMENT AND INCLUSION

Focaccia Group complies with its legal obligations to include people with disabilities, in accordance with current legislation, and undertakes to encourage the various company departments to integrate these resources. The inclusion of differently-abled resources is ensured by constant attention to providing working tools and an environment adapted to their needs, and ensuring participation in training and social initiatives with the necessary support.

Focaccia Group appreciates the value of resources that have been working in the company for a longer period of time and with a high professional level. Constant attention is paid to refresher courses, managerial training, and involvement in projects also with a higher innovation component.

Progressive internationalisation leads to the opportunity to meet talent and include resources from different nationalities, cultures and religious traditions. Everyone is guaranteed a positive working environment and respect for their rights.

5.APPRAISAL OF RESOURCES

With a view to enhancing the development of the professional skills of the resources, at the beginning of each financial year the managers assign and discuss the objectives (professional, management, personal and corporate development) with each resource on the basis of their professional profile, organisational role, strategic objectives of the unit to which they belong. These objectives are weighted according to the priorities assigned to each resource and are clearly established in terms of results, measurable where possible. Interim feedback during the year allows managers and individual resources to share the degree to which objectives have been achieved. Employees are encouraged to ask for clarification and managers are called upon to give continuous feedback in any case to enable team members to become aware of the expected performance and to ensure that each resource has the right skills to achieve its objectives.

Particular attention is given to proper individual conduct.

Legislation, employment contracts, and individual contracts may regulate the way negative evaluations are handled, the corrective actions to make up for unsatisfactory work performance, and any impact on career advancement and variable pay. The latter may not be disbursed in the event of an objective, tracked and formalised negative evaluation.

6. CAREER ADVANCEMENT PROCESS

In close connection with the appraisal process, staff may be subject to being moved to a new contractual level or assigned to a new role, as part of the career advancement process linked to the filling of new organisational roles on the basis of experience acquired and results achieved. Gender balance is also pursued in professional development, ensuring equal access to roles of responsibility and/or managerial content, also with the aim of bridging any gaps in gender representation that may exist in organisational units among resources with greater seniority, with equal skills, qualifications and abilities. The promotion process involves the proposal phase coming from the head of the unit concerned, subsequent sharing with the human resources function and final approval with the involvement of management.

7.TRAINING INTERVENTIONS

Focaccia Group drafts a training plan, which is designed to allow the staff to be constantly updated on issues related to their role and related topics (safety, environment, etc.).

Training initiatives can be differentiated according to role, the assessment of those who need to develop their skills to a more advanced degree, as well as those for whom the acquisition of new knowledge needs to be fostered due to requirements linked to possible interventions in the organisational structure.

Participation in individual initiatives is normally agreed between the manager, the person concerned and the relevant human resources function. The combination of these tools makes it possible to implement paths of integral valuing of people, a fundamental asset and a prerequisite for competitiveness, and contributes to the achievement of sustainable performance in the long term.

8. INTERNAL COMMUNICATION AND ENGAGEMENT

Focaccia Group recognises the importance of internal corporate communication as a tool for sharing institutional information and a motivational driver for staff. Internal communication pursues the objectives of:

- creating a communication model and style aimed at generating a constant flow of information for employees;
- improving the sharing between people and a sense of teamwork;
- disseminating the identity and values of Focaccia Group.

Employee engagement, involvement and satisfaction are periodically monitored through specific initiatives.

Informative and operational digital communication tools are put in place that are useful and usable and can convey clear and up-to-date information.

Sharing activities such as meetings and events outside work, relational activities aimed at increasing opportunities for exchange between colleagues are promoted.

9. STAFF HEALTH, SAFETY AND WELFARE

The company considers the health and safety of workers to be a priority.

For this reason, it is committed to achieving, maintaining and complying with the requirements for the protection of workers and the healthiness of the working environment defined by the specific regulations applicable in the countries where it is present, with an approach aimed at continuous improvement.

To this end, the Group implements an effective safety management system, certified according to ISO45001:2018. It contributes to the identification and assessment of business risks, with the aim of mitigating and eliminating them wherever possible.

The Group constantly regulates and monitors supporting activities, disseminates the principles governing regulatory obligations, including through specific training courses, standardises the ways of involving all employees according to their role and the activities they perform, and organises company health surveillance through the appointed external structures.

Riccardo Focaccia FOCACCIA GROUP SRL