



Fincons Group Policy

# ANTI-DISCRIMINATION & ANTI-HARASSMENT



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# 01 // Document Information

<b>Title</b>	Fincons Group Anti-Discrimination and Anti-Harassment Policy
<b>Purpose</b>	The purpose is to describe the principles and actions implemented by Fincons Group in relation to the subject matter.
<b>Prepared by</b>	Human Resources Department
<b>Approved by</b>	CEO
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<b>Version</b>	1.0
<b>Target group</b>	Employees, Business Partners
<b>Related documents</b>	<ul style="list-style-type: none"><li>• Handbook</li><li>• Welcome Kit</li><li>• Code of Ethics</li><li>• Career Path</li></ul>
<b>References to documents</b>	
<b>Previous documents</b>	

## 02 // Introduction

Fincons was founded in 1983 as a software house and over the years has evolved into a software consulting firm. Today, Fincons is a “big provider”, supporting companies in the field of IT business consulting and using its know-how to deliver digital transformation and technology projects to launch new business models. Fincons is a privately-held company, whose owners are committed to developing a long-term strategy and vision, and to the day-to-day management of the group as it continues to grow, not only in Italy but also internationally.

Thanks to the passion and energy of our people and solid financial management, we are now a leading company with representation in many different countries. We have the capacity to seize the opportunities offered by the new technologies and support our clients' growth by providing the very best expertise.

By working constantly with our customers, our people and know-how have made an important contribution to the digital transformation while remaining true to the principles that have guided the company from the outset, even in difficult situations. This helps us to take the right decision based on the highest principles of ethics, behaviour, honesty, transparency and adoption of the most stringent international standards.

To achieve all this, we share with all our stakeholders a culture based on honesty, trust and mutual respect for their experiences and contributions to our shared business. Our professional reputation, human capital and ethical values have always guided our behaviour during the many evolutions of our Group, allowing us to create sustainable value over time.

Respect for the rules of conduct and the reputational value of our Group are as important today as they were in the past, and form an essential part of our behaviour and professional growth. These are the guiding principles that light our way as we seize opportunities for growth in challenging projects. In a world that is becoming increasingly connected, staying true to our values is essential.

Staying true to our values is seen primarily in the actions we take to safeguard the basic and essential rules on equality of treatment and inclusivity within our organisation, and to reject any type of discrimination and/or abusive behaviour that may interfere with the personal or professional lives of our own personnel and that of our partners in the supply chain.

## 03 // Work and People

The Group recognises the central importance of human resources and of establishing and maintaining relationships based on loyalty and mutual trust. Fincons considers human resources as one of its main strategic success factors and promotes the constant professional and personal growth of its internal personnel and external collaborators. In addition, the Group fosters cooperation and mutual collaboration among its employees in the awareness that the success of our organisation is strongly linked to the results of our Teams.

When it comes to HR management, our guiding principles are to respect workers' rights and fully value their contribution in order to support their advancement and professional development.

## 04 // Anti-Discrimination and Equal Opportunities

In all decisions that influence relations with staff or people outside the company, the Company is committed to avoiding any form of discrimination based on age, gender, sexual orientation, state of health, disability, race, nationality, political opinions, trade union membership or religious beliefs. Any form of discrimination and/or violence is considered unacceptable and will be sanctioned by the Company.

All personnel must therefore refrain from any form of discrimination, direct or indirect, against another employee or collaborator of the Company.

Direct discrimination is when one person is treated less favourably than another person is, has been or would have been treated in a similar situation, due to religion, personal, political or ideological beliefs, age, sex, sexual orientation, racial or ethnic background.

Indirect discrimination is when any apparently neutral provision, principle, practice, act, agreement or behaviour may put any individual who follows a certain religion or ideology, any individual with a disability, any person of a particular age or sexual orientation or of a specific sex, anyone of a certain race or ethnic background, at a particular disadvantage compared to other individuals.

Therefore the Company will not tolerate any jokes, banter, comments or other behaviours that offend another person or make them feel discriminated against or that the workplace is a hostile environment. Fincons does not tolerate any form of discrimination and, on the contrary, seeks to guarantee equal opportunities not only for its employees, but also for anyone else working with the Group, to ensure that each individual is treated according to their professionalism, competence, behaviour and results.

Full and appropriate cooperation must be provided to all colleagues, irrespective of social, cultural, ethnic or national origins, religious or other beliefs. In this regard, Fincons invites all the Recipients of this Policy to treat each individual exclusively on the basis of their professional competence, behaviour in the workplace and results.

Anyone who feels discriminated against can contact their Manager or the HR Department to obtain the necessary support. Anyone witnessing discriminatory behaviour displayed by an internal employee, external contractor or third party are strongly encouraged to report such incidents to their Manager, HR Department or Ethics Officer.

#### **4.1 RECRUITMENT PROCESS**

The recruitment process must be based exclusively on the candidate's fitness for the role, their professional profile and aptitudes. During interviews, candidates may only be asked to give the information necessary to verify their professional skills and expertise.

The objective of the recruitment process is to create value for the Group and therefore no form of nepotism or favouritism will be tolerated. During the recruitment process, the Group will take appropriate measures to conform to these principles, within the limits of the information available.

By way of example, all job advertisements must be neutral. They must not contain any reference and/or limitation pertaining to race, ethnic background, age, sexual orientation, membership of trade unions or political parties or to religious or personal beliefs or disabilities.

Where interviews are conducted by in-house personnel, the interviewer must not be provided with any personal information about the candidate.

#### **4.2 EQUAL PAY**

Fincons is committed to combating any disadvantages in the workforce, any restriction of opportunities to take part in the life of the company or decisions made within the organisation and any limitation of access to opportunities for career advancement or pay increases.

At the time of hiring and throughout the period of service, all Fincons staff will be employed under conditions that favour gender equality and which do not discriminate on the basis of different personal beliefs. The pay offer made at the time of hiring, and all salary reviews, are objectively determined on the basis of the worker's skills and performance.

#### **4.3. CAREER PATH AND PERFORMANCE APPRAISAL**

Fincons is committed to combating any disadvantages in the workforce, any restriction of opportunities to take part in the life of the company or decisions made within the organisation and any limitation of access to opportunities for career advancement or pay increases.

At the time of hiring and throughout the period of service, all Fincons staff will be employed under conditions that favour gender equality and which do not discriminate on the basis of different personal beliefs.

The pay offer made at the time of hiring, and all salary reviews, are objectively determined on the basis of the worker's skills and performance.

## 05 // Harassment and Bullying

Fincons promotes initiatives aimed at achieving greater well-being within the organisation. In all its internal and external relations, the Group requires the total avoidance of all forms of harassment, bullying or similar, behaviours which are strictly prohibited.

Examples of prohibited behaviours include:  
creating a work environment that is intimidating, hostile, isolating or otherwise discriminatory towards individuals or groups of workers;  
unreasonably interfering with the performance of colleagues' work;  
obstructing the career prospects of a colleague purely for reasons of personal competitiveness or in order to facilitate another employee.

Any form of harassment or violence of a sexual nature or related to cultural and personal diversity is also prohibited. For example:  
making any decision about an employee's career subject to the acceptance of sexual favours; inducing other employees or colleagues to provide sexual favours by exploiting a personal role within the Company;  
alluding to disabilities and/or physical and/or mental health issues or to any form of cultural or religious diversity or to the worker's sexual orientation in order to obtain favours or to influence the worker in their activity. No form of retaliation, revenge or victimisation against a person claiming to have suffered harassment will be tolerated.

All staff must, as far as possible, contribute to the prevention and combating of all forms of harassment, including sexual harassment, within the Company.

If you become aware of, or suffer, any form of direct or indirect discrimination, bullying or harassment, including sexual harassment, you must contact your HR officer.



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