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## 1 Introduction

This document combines those policies that make up the corporate culture of Akkodis Italy (hereinafter AKIT). The following aspects are then presented and developed:

- The definition of the mission, vision and values of the company together with the guidelines from its context in the Adecco Group (Code of Ethics and corporate values at group level)
- The positioning of AKIT regarding its social responsibility and the principles of action
- Guidelines on the treatment of confidentiality

AKIT considers this orderly statement about the company's behavior necessary in order to improve the communication of these aspects to all its stakeholders and consolidate its sustainability and business strategy.

## 2 Scope

The implementation of the guidelines in this document involves all AKIT employees, at different levels of hierarchy, and regardless of whether they perform their work at a client's or Akkodis' premises. Akkodis Italy also engage their external partners when acting on their behalf.

As a subsidiary of the Adecco Group and Akkodis Group, Akkodis Italy participates in the indications that are transmitted by the group, integrating them consistently in this document.

## 3 Context

### 3.1 Mission

Akkodis is a global digital engineering company and Smart Industry leader. We enable clients to advance in their digital transformation with Consulting, Solutions, Talent, and Academy services. Headquartered in Switzerland and part of the Adecco Group, Akkodis is a trusted partner to the world's industries. We co-create and pioneer solutions that help to solve major challenges, from accelerating the clean energy transition and green mobility, to improving user and patient centricity. Empowered by a culture of inclusion and diversity, our 50,000 tech experts across 30 countries combine best-in-class technologies and cross industry knowledge to drive purposeful innovation for a more sustainable tomorrow. We are passionate about Engineering a Smarter Future Together.

Akkodis Italy is a subsidiary of Akkodis sharing the same mission.

For more information about Akkodis Italy activities, see <https://www.akkodis.com/en/italy>

For more information about Akkodis, see <https://www.akkodis.com/>

### 3.2 Vision

Akkodis established a strategic vision:

- In 2025 Akkodis will have revenues > 6 B€, a double digit EBITDA margin and will be in the top two in key global tech markets - being a leader in Smart Industry Services
- Lead the Smart Industry Market
- Attractive for talents: drive the digital revolution
- Redefine industries for a sustainable tomorrow
- Balance Sales Mix
- Limited client dependency

### 3.3 Values

As a subsidiary of The Adecco Group, Akkodis Italy shares the same core values:

- Passion
- Collaboration
- Inclusion
- Courage
- Customer at the heart

## 4 Corporate Social Responsibility and Corporate Culture

### 4.4 UN Global Compact

As a starting point in the CSR, shall be indicated that The Adecco Group subscribes to the UN Global Compact continuously and publicly since 2003. The ten principles of the United Nations Global Compact focus on four areas (Human rights, labor, environment, and anti-corruption). In addition, this agreement is derived from:

- The Universal Declaration of Human Rights.
- The Declaration of the International Labor Organization on Fundamental Principles and Rights at Work.
- The Rio Declaration on Environment and Development.
- The United Nations Convention against Corruption.

Through this Social Responsibility Policy, AKIT wants to record unanimity with this international agreement. AKIT wants to reiterate through this declaration its commitment to the compliance with the current national legislation and the applicable international standards that apply to it.

The Social Responsibility Policy has a global character, that is, it affects all the business areas of AKIT, in all geographic areas where our activity takes place.

The Social Responsibility Policy consists of the general principles of action of AKIT and the specific principles of action in relation to its different stakeholders.

### 4.5 The Adecco Group Code of Conduct and common framework

As a subsidiary of The Adecco Group, Akkodis Italy shares also the same Code of Conduct available in our website. It reflects the behavior that the Management considers fundamental for the correct development of all activities without exception.

Membership of The Adecco Group means that each of its members explicitly agrees to adhere to this Code of Conduct, which will prevail over those internal rules that could contradict it and the application of its content. Under no circumstances may it breach the applicable laws.

Within the framework of the Group's corporate culture, AKIT applies in its daily work the Code of Conduct and the mentioned values.

As a consequence, principles of actions and interested parties of The Adecco Group are also applied and described within the Code of Conduct

## 4.6 Akkodis Italy specificities

In addition to the interested parties and principles of action detected by The Adecco Group in its code of conduct, Akkodis Italy has identified its own specific interested parties that may be affected by the organization's activities or decisions:

- The Adecco Group (TAG)
- Akkodis Group
- Customers
- Suppliers (including freelances)
- Regulatory Authorities
- Akkodis Employees (including Work Council, OH&S Committees...)
- External Employees (Customers, Suppliers, Regulatory Authorities... who may visit Akkodis facilities)
- OH&S Internal & External Service and Accident Insurance Company
- Competitors
- Society

Moreover, Climate change has been taken into account in the analysis of the organization's context and in the identification of the needs and expectations of stakeholders, in accordance with the ISO amendments published in 2024, and it has been considered as non-relevant issue for our activity.

AKIT maintain an open and permanent dialogue with all these interested parties, in order to meet their needs, manage their expectations and offer the best solutions on the market, as reflected in the following table:

| Interested parties            | Needs and expectations   | Communication  |
|-------------------------------|--|--|
| <b>The Adecco Group</b>       | <ul style="list-style-type: none"> <li>○ Achievement of annual economic objectives</li> <li>○ Compliance with the group policies</li> <li>○ Alignment with the group strategy</li> <li>○ Synergies</li> </ul>  | <ul style="list-style-type: none"> <li>○ Financial close is reported monthly to the Adecco Group, in the consolidation system</li> <li>○ Budget is made once a year</li> <li>○ Quarterly Forecast</li> </ul>   |
| <b>Akkodis Group</b>          | <ul style="list-style-type: none"> <li>○ Achievement of annual economic objectives</li> <li>○ Compliance with the group policies</li> <li>○ Alignment with the group strategy and vision</li> <li>○ Sustainable growth</li> <li>○ Diversification</li> </ul>   | <ul style="list-style-type: none"> <li>○ All financial reports reported to the Adecco Group are previously reviewed by the Akkodis Group</li> <li>○ Monthly Performance Report (MPR)</li> </ul>  |
| <b>Customers</b>              | <ul style="list-style-type: none"> <li>○ Requirement's compliance</li> <li>○ Quality service</li> <li>○ Deadlines</li> <li>○ Good value/price</li> <li>○ Value added</li> <li>○ Reliability</li> <li>○ Long-term development of relationships based on trust and in mutual respect</li> <li>○ Efficient OH&amp;S Coordination</li> </ul> | <ul style="list-style-type: none"> <li>○ Business proposals</li> <li>○ Commercial visits</li> <li>○ Follow-up meetings</li> <li>○ Satisfaction surveys</li> <li>○ Annual sustainability report</li> </ul>  |
| <b>Suppliers</b>              | <ul style="list-style-type: none"> <li>○ Clarity of requirements and expectations</li> <li>○ Transparency and symmetry when making a partnership</li> <li>○ Operational and economic fluent relationship</li> <li>○ Efficient OH&amp;S Coordination (when need to access to Akkodis facilities)</li> </ul>                               | <ul style="list-style-type: none"> <li>○ Key suppliers shall adhere to The Adecco Group's Third-Party Code of Conduct</li> <li>○ Informal communications</li> </ul>  |
| <b>Regulatory Authorities</b> | <ul style="list-style-type: none"> <li>○ Compliance with the rules and regulations</li> <li>○ Communication of malpractices in the market (counterfeit parts...)</li> </ul>  | <ul style="list-style-type: none"> <li>○ With the Treasury and Social Security through the automatic system of notifications and written responses to these notifications, in cases where it is necessary</li> <li>○ Regular audits by regulatory bodies for our various certifications</li> </ul> |
| <b>Akkodis Employees</b>      | <ul style="list-style-type: none"> <li>○ Shared company values</li> <li>○ Interesting Jobs</li> <li>○ Professional Development opportunities, interesting projects) (growth)</li> <li>○ Stability</li> <li>○ Good working environment</li> </ul>   | <ul style="list-style-type: none"> <li>○ Works Council meetings</li> <li>○ Collective negotiation</li> <li>○ Performance evaluation</li> <li>○ Training programmes</li> <li>○ Active listening</li> <li>○ Incident management</li> </ul>   |

|  |  |  |
|--|--|--|
|  | <ul style="list-style-type: none"> <li>○ Good communication and participation to company decisions</li> <li>○ Conciliation of working and personal life</li> </ul>   | <ul style="list-style-type: none"> <li>○ Global group townhalls (Akkodis and Adecco) with all employees</li> <li>○ Monthly communication meetings with each team</li> <li>○ Regular newsletters</li> <li>○ Occupational health and safety rules</li> </ul>   |
| <b>External Employees</b>  | <ul style="list-style-type: none"> <li>○ Efficient OH&amp;S Coordination (quick access)</li> <li>○ Adequate OH&amp;S measures and material (PPE, good work environmental, risks awareness ...)</li> </ul>  | <ul style="list-style-type: none"> <li>○ Communications of safety, health and confidentiality rules in force at each site</li> </ul>   |
| <b>OH&amp;S Internal &amp; External Service and Accident Insurance Company</b> | <ul style="list-style-type: none"> <li>○ Good OH&amp;S Management</li> <li>○ OH&amp;S legal compliance</li> </ul>  | <ul style="list-style-type: none"> <li>○ Accident reporting</li> </ul>   |
| <b>Competitors</b>   | <ul style="list-style-type: none"> <li>○ Companies in the same sector that may be affected by Akkodis' decisions and activities</li> <li>○ Benchmarking y ESG positioning: Comparison in terms of sustainability, social impact and governance</li> <li>○ Transparency and regulatory compliance: Clear information aligned with standards (CSRD, GRI, NFRD, SASB, etc.)</li> <li>○ Innovation and value chain: Circular economy strategies, carbon footprint and policies with an impact on suppliers and customers</li> <li>○ Ethics and Governance: Diversity, Inclusion, and Anti-Corruption Policies That Can Influence the Market</li> </ul> | <ul style="list-style-type: none"> <li>○ Public sustainability reports (NFR, CSR, ...)</li> <li>○ Participation in sectoral forums and associations</li> <li>○ Benchmarking studies and publications</li> </ul>  |
| <b>Society</b>   | <ul style="list-style-type: none"> <li>○ Considering the environmental impact of Akkodis' operations and its social responsibility</li> <li>○ Transparency and Accountability (particularly in community and environmental impact)</li> <li>○ Contribution to Sustainable Development (for example to reduce the carbon footprint, manage resources and promote social equality)</li> <li>○ Job Creation</li> <li>○ Social Commitment</li> <li>○ Ethics and Regulatory Compliance (in particular climate change)</li> </ul>  | <ul style="list-style-type: none"> <li>○ Public sustainability reports CSRD, EINF, ...)</li> <li>○ Environmental declarations (e.g., carbon footprint)</li> <li>○ Corporate volunteering and social initiatives</li> <li>○ Participation in local community events</li> <li>○ Website and social media transparency updates</li> </ul> |

#### 4.7 Confidentiality Policy

AKIT recognizes the importance of processing all the information obtained during its activities with the strictest confidentiality. As well as, inventions, developments and new products, innovations and know-how.

Therefore, it is AKIT's goal to ensure that professional confidentiality is maintained at all times and is responsible for the proper management of all related information.

In line with the principles of actions described in the Code of Conduct, Akkodis Italy has established the following controls:

- Immediately after hiring or prior to the start of activities with AKIT, all staff will receive instructions that will emphasize the confidential nature of the work of AKIT and will be aware of the mandatory compliance with the Privacy Policy.
- All employees and contracted or subcontracted personnel, including directors, will receive a copy of the Confidentiality Agreement, which stipulates a set of premises defined by those who commit to maintain confidentiality in their functions. This document specifies the principles of action related and must be signed as part of the Conditions of Employment.
- Confidential information will be protected against any unauthorized access and will be handled as stipulated in the laws and regulations of the countries in which we operate.

#### Commitment by AKIT

AKIT will observe all reasonable precautions to maintain confidentiality with respect to:

- a) Information on commercial operations or production processes delivered by the Client to AKIT that has not been published or is not public knowledge.
- b) Specific data and results obtained during the performance of work for the Customer, including information provided by sources other than the Customer.
- c) AKIT reports for the Client that include or refer to information defined in point a) and / or specific data and results defined in item b).

The reports and data will not be discussed with any third party without the specific authorization of the client. When by legal obligation or by authorization in the contractual commitments AKIT requires that the information be disclosed to a third party, AKIT will formally agree and communicate to the client what information is to be provided, as permitted by law.

All conditions relating to the protection of confidential information with customers will be agreed upon by both parties signing the Non-Disclosure Agreement and the General Conditions of Purchase / Sale of Akkodis Italy.

## 5 Annex

### References

| Title   | External Reference      |
|---|-------------------------|
| [1] Quality Management Systems - Requirements   | ISO 9001:2015           |
| [2] Quality Management Systems - Requirements for Aviation, Space and Defense Organizations -Chapter 4, 8 | AS 9100D / EN 9100:2018 |
| [3] Occupational Health and Safety  | ISO45001:2018           |
| [4] Environmental Management Systems - Requirements with guidance for use                                 | ISO14001:2015           |
| [5] TISAX "Trusted Information Security Assessment Exchange"  | VDA ISA 6.x             |
| [6] Global Compact commitment The Adecco Group  | Global Compact          |
| [7] The Adecco Group Code of Conduct  | GP 01.00 January 2025   |

### Acronyms / Abbreviations / Definitions

| Acronym / Abbreviation | Definition                                     |
|------------------------|--|
| AKIT                   | Akkodis Italy                                  |
| CSR                    | Corporate Social Responsibility                |
| ISO                    | International Organization for Standardization |
| OH&S                   | Occupational Health & Safety                   |
| PPE                    | Personal Protective Equipment                  |
| SR                     | Social Responsibility                          |

## APPENDIX : Document Approval and Revision

**(FOR COMPANY USE ONLY – To be removed when shared with third parties)**

|                     | Position    | Name             | Signature |
|---------------------|-------------|------------------|-----------|
| <b>Executed by</b>  | HR Director | Leonardo Mancusi |           |
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| <b>Validated by</b> | VP HR Italy | Lola Rodriguez   |           |
| <b>Approved by</b>  | CEO         | Luis Santiago    |           |

| Issue Date        | Page | Reasons for revision   |
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