

Company Policy

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Forme di diffusione in azienda
Il presente documento è condiviso con tutti i lavoratori.

Modalità di conservazione
Il documento è conservato in modo cartaceo ed informatico a cura dell'Amministrazione.

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Premises

Policies are to a company what rules are to the player of a game. They are the framework and constraints within which everyone can strive for individual and collective success. Besides, for anyone who has watched a few kids playing together it is pretty obvious why rules are so important. And why it is a good idea to write them down.

Workplace Health & Safety Policy

Our Occupational/ Workplace Health and Safety Policy help us preserve the best possible work conditions for our employees. Every employee has a right to feel safe at work. Our company is committed to follow legal standards and create a hazard-free workplace.

Our Occupational/ Workplace Health and Safety Policy help us preserve the best possible work conditions for our employees.

Scope

This procedure applies to all employees including partner agencies, visitors, contactors, agency and sub-contracted staff. Managers at all levels are expected to take an active lead to ensure that health and safety and systems of internal control are of the highest standard and integral to the operation of the organisation. All employees and other persons are expected to have due regard for their own health and safety and that of their colleagues and other persons. If safe systems of work have been introduced, employees are expected to follow them, and any other relevant instructions.

Preventive Action

Employee Duties and Responsibilities

All employees are to:

- Take reasonable care of their own safety and the safety of others who may be affected by their acts or omissions; Co-operate with management and comply with all relevant health and safety legislation, General-Oxo S.A. policies and procedures.
- Report any hazards, damage, or defects immediately to their line manager; Report any accidents, incidents or near misses to their line manager and assist with any subsequent investigation; Understand and follow emergency arrangements in place for their location to

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ensure their own and others safety.

- General-Oxo S.A. Is a smoke free environment and no exception can be made. It is to preserve employee's safety. Smoke is permitted outside the offices.
- Alcohol and illicit substances/ drugs are not allowed in General-Oxo S.A. And no employee can present himself drunk or under effects of drugs.
- No animals are permitted to avoid any possibility of contamination and/or allergies to the working people

Accident and Incident Reporting

In the event of an accident/incident staff will ensure that a detailed entry of the event is recorded on an accident form and will notify their line manager.

Where an accident/incident has occurred, it is necessary to carry out a review of the risk assessment of the task being undertaken at the time, to ascertain if additional precautions, an alteration of the method of work or additional control measures are necessary. This must be written down and the conclusions clearly defined and acted upon.

As a learning organisation we will use the information to prevent re-occurrences, where reasonably practicable, to the same events.

General Housekeeping

Poor housekeeping is a common cause of accidents especially slips, trips and falls and fires in the workplace. In order to ensure that satisfactory standards of housekeeping are achieved the following arrangements are to be adhered to by all employees:

- Check that the workplace is free from hazards at the beginning and end of each day.
- Always put office equipment away immediately after use.
- Clear up any spillages or spills etc. immediately as per local procedures.
- Report to the designated building manager any loose carpet or any damaged floor

coverings.

- Do not allow objects to protrude into walkways.
- Ensure that waste materials are properly stored and are removed on a regular basis;
- Ensure that special arrangements are made for the removal of unusual or extra-large

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items;

- Do not store office equipment anywhere other than in designated areas;
- Ensure that your work area is kept tidy at all times;
- Trailing leads will be avoided wherever possible or otherwise ramped or protected to

avoid potential tripping hazards;

- The bottom drawers of filing cabinets should be filled first and, in the absence of safety devices to prevent it toppling, only one drawer at a time should be opened to avoid the risk of toppling; Defects such as broken chairs, faulty drawers, trailing cables etc. should be reported immediately to your line manager;
- Chairs - routinely inspect chairs for condition, do not use chairs for climbing – a stepping stool or step ladder only should be used.
- When using the kitchen, all plates have to be duly washed and stored after lunch break for respect of other people using the same spaces
- When using the kitchen, if aliments are stored, it is of the owner of the goods the responsibility to dispose any goods expired

Electrical Risks

Electrical accidents can have very serious consequences. To help prevent them, remember these three basic rules:

- Always check electrical equipment visually before use and report faulty or damaged equipment; do not attempt to use it;
- Do not try to repair faulty equipment; Leave it to a competent person;
- Never use electrical equipment in damp surroundings unless you know that it is suitable for that purpose.

Mandatory rules for all workers of General-Oxo S.A. To prevent possible electrical accident and fires are:

- When quitting the workplace ALWAYS close all lights of workplace
- When quitting the workplace ALWAYS close computer and any other open device shall be closed
- When using the kitchen ALWAYS make a double check before leaving office that all plates are closed

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Manual Handling

Poor lifting and carrying technique contribute to manual handling related injuries of staff every year. Although there are some members of staff who lift objects on a daily basis as part of their employment, nearly all staff will lift some objects during their working week. Good technique is vital in preventing injury. If the object to be lifted is large, awkward or heavy then an assessment should be undertaken. The first part of any assessment should consider whether the object needs to be lifted at all. Engineering methods e.g. lifting appliances, or trolleys etc., should be considered next, if this is not possible a method for manual lifting with the assistance of other staff can be used. Many people use poor techniques and have escaped injury due to their general fitness and age. However there will be a risk of eventual injury as these conditions change. A serious back injury could cause substantial pain and be extremely debilitating.

Some tips on efficient lifting:

- is it necessary to lift the load? If not – don't!
- assess the lift and decide if help is needed;
- obtain a firm grip on the load (use gloves if necessary);
- bend at the knees not from the waist;
- use your legs not your back to thrust upwards (the leg muscles were designed for power and strength);
- keep the load near to your body;
- do not twist your spine when lifting or carrying loads.

Emergency Management

Emergency management refers to our plan to deal with sudden catastrophes like fire, flood, earthquake or explosion. These depends on human error or natural forces.

Our emergency management involves the following provisions:

- Technicians available to repair leakages, damages, blackouts quickly

→ Please refer to the following numbers in case of emergencies (da compilare)

- Fire extinguishers are available on each floors and easily accessible

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- An evacuation plan posted on the wall of each room of the office
- Fire escape is one and only. To use only the stairs till the ground floor and exit immediately the building
- Fully stocked first-aid kit in the bathroom of the office

Emergency numbers are the following:

To be completed

→ Reporting and responsible person for ensuring health and safety of the workplace is:

Giada Cerinotti

g.cerinotti, phone number ecc

Disciplinary Consequences

Every team leader is responsible for implementing this health and safety policy. Employees should follow health and safety instructions and will be held accountable when they don't. We'll take disciplinary action that may extend to termination when employees consistently disregard health and safety rules.

It's everyone's responsibility to contribute to a healthy and safe workplace.

Equal opportunity Policy

This Equal Opportunity Employer Policy applies to all employees, job candidates, contractors and visitors.

Policy brief & purpose

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Our Equal opportunity Employer Policy reflects our commitment to ensure equality, treat everyone with respect and promote diversity in the workplace.

This equal employment opportunity policy is the pillar of a healthy and productive workplace. Everyone should feel supported and valued to work productively so we are invested in treating everyone with respect and consideration.

Scope

This Equal Opportunity Policy applies to all employees, job candidates, contractors and visitors

Policy elements

Being an equal opportunity employer means that we provide the same opportunities for hiring, advancement and benefits to everyone without discriminating due to protected characteristics like:

- age
- gender
- sexual orientation
- ethnicity/ nationality
- religion
- disability
- medical history

EEO policy

We built our equal employment opportunity policy around preventive and affirmative actions to ensure fairness in all aspects of employment. These aspects include:

- Hiring
 - Training
 - Evaluating performance
 - Administering compensation and benefits
 - Terminating employees

We also want to make sure that equal opportunity applies to other instances. For example, we don't retaliate against employees and we are committed to prevent and resolve any kind of harassment against our employees, including sexual harassment.

Our C.E.O. is responsible for assessing our company's processes and ensuring they are bias-free. Whenever we find biases interfering, we will act immediately to refine our processes, train our people to combat their biases and protect possible victims of discrimination. We will give everyone

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the chance to work in an environment where their rights are respected.

Actions

To promote equal opportunity, we first ensure we follow EEOC regulations and EEO laws that apply to each part of our company.

We will also take additional actions as follow:

- Modify structures and facilities to accommodate people with disabilities.
- Use inclusive language in all signs, documents and webpages
- Provide parental leave and flexible work arrangement policies wherever possible
- Hire, train and evaluate employees through job-related criteria.
- Allow employees to take religious or national holidays that aren't included in our company's official schedule.
- We implemented a whistleblower mail in order to report any kind of discrimination. The mail is whistleblower@general-oxo.ch and it is directly connected to our C.E.O. Who will respond and take actions immediately. mote fairness and diversity as part of our equal employment opportunity policy. We will:

Grievance Procedure

All supervisors and managers are responsible to use equal opportunity practices and make decisions based on objective, non-discriminatory criteria. Everyone should comply with our policy at all times.

If you see or suspect that our EEO policies are being violated, you should immediately notify situation to the C.E.O. Through the whistleblower mail which is whistleblower@general-oxo.ch . If you suspect that someone is behaving in a wrong way but doesn't realize it, you could also talk to them directly.

Disciplinary Consequences

When someone discriminates, they will be subject to disciplinary action depending on the severity of their actions. For example, unintentionally offending a coworker might warrant a reprimand, but harassing someone systematically might result in demotion or termination.

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Employee Code of Conduct Policy

Policy brief & purpose

Our **Employee Code of Conduct company policy** outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. Any ideas, proposals to improve any part of the company can be brought, anytime, directly to management. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

Scope

This policy applies to all our employees regardless of employment agreement or rank.

Policy element

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image. All employees should take as a guideline our Code of Ethics.

Respect in the workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

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Protection of Company Property

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse **company equipment** or use it frivolously.
 - Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.
 - Any information about the company can not be transferred to third parties unless it is of vital importance and must be communicated to C.E.O.
 - As a guideline all employees should respect and follow the NDA signed when hired

Employees should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.

Professionalism

All employees must show integrity and professionalism in the workplace:

- **Personal appearance**

All employees must follow our dress code and personal appearance guidelines.

Sales representative shall dress with shirt and normal (not sport shoes).

Administration and Financial work force have a free dress code, but should anyhow remain clean and decent.

Fridays are considered "Casual Friday" for all employees of General-oxo S.A.

- **Corruption**

We discourage employees from accepting gifts from clients or partners. We prohibit briberies for the benefit of any external or internal party. Code of Ethics is giving the guidelines on how we should behave.

- **Job duties and authority**

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete

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their duties with skill and in a timely manner.

We encourage mentoring throughout our company.

- **Absenteeism and tardiness**

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work. Guidelines are expressed in the leave, absence and working hour Policy.

- **Conflict of interest**

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- **Collaboration**

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- **Communication**

All employees must be open for communication with their colleagues, supervisors or team members.

- **Benefits**

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

- **Policies**

All employees should read and follow our company policies. If they have any questions, any suggestions to improve our company policies they should ask their managers or C.E.O.

Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
 - Reprimand.
 - Suspension or termination for more serious offenses.
 - Detraction of benefits for a definite or indefinite time.

We will take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

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Leave of Absence Policy

Office hours

General-oxo S.A. Has official working hours :

- **Opens at 9:00 AM**
- **Lunch break can be taken freely between 12:00 to 14:00 and break time is 1:00 Hour unless expressed differently on the job contrac**
- **Closes at 6:00 PM**

One of General-Oxo S.A. Principle is that despite having official hours, any worker can decide freely the time to spend in office. Working hours are not considered mandatory therefore any worker can decide when to come or when to leave the office. The only mandatory request from the company is that tasks and goals must be completed in due time. If tasks and work have been completed in less than the working hours, an employee can leave the office without any justification.

Nevertheless administration and financial department must have at least one worker present in the company to be able to answer phone calls and react promptly to any request or problem arising during the day. Therefore an agreement between the workers of these departments must have been taken before leaving early, not to let the company with no coverage for sudden tasks.

Home office is also contemplated and can be taken on a weekly rate of 1 day per week. Home office shall be organized in due time and shall always leave the company covered with a worker inside the officies.

Last but not least, any abuse of the freeness given by General-Oxo S.A. Can have severe disciplinary actions.

Extra hours

It has to be understood that Extra Hours shall be intended only as extraordinary situations where a deadline must be met. General-Oxo S.A. Wants that workers will organize themselves in the best way in order to meet job requirement in due time. It will be also General-oxo S.A.

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Task to offer plausible and feasible tasks for normal working hours. Extra hours shall be compensated with holidays and not with money, as per worker contracts.

Holidays

Holidays in General-oxo S.A., follows Swiss Law and are meant to be a total of 4 weeks per year. There are 10 official dates which are Swiss official holidays and office will remain closed on these days.

3 weeks as minimum per year shall be considered and office will remain closed on these dates. As an indication each year office will close as a minimum of 2 weeks during the central weeks of August and 1 week as minimum between the 24th of December till the 2nd of January.

Following our policy of Equal Opportunities, any days can be taken off with at least 1 month advice, for any ethnical, religious, national or other special dates.

Holidays can be taken when office remains open on the following conditions:

- **All tasks, work and goals are under control and no delays or underperformance will occur to General-Oxo S.A.**
- **When holidays are asked, at least 1 month of advice is requested if less than 3 days, 3 month advice if less than 1 week. For more than 1 week it shall be discussed internally and request shall be made at least 5 month before the leave**
- **Any days off outside of closure must be agreed in order to have an other worker covering the daily tasks of the worker going on holidays**
- **Any worker leaving the office for more than 3 days shall prepare and pass all current and future tasks underway to his replacement, in a written and clear report**

Holidays which are not consumed during the current year can not be carried over on a following year. An exception can be made if holidays are taken between December and January.

Company Policy

Employee Disciplinary Action Policy

Policy brief & purpose

Our **Disciplinary Action company policy** explains how we address our employees' misconduct or inadequate performance. Employees must be aware of the consequences of their actions. We use this policy to outline our disciplinary procedure.

Scope

This policy applies to all our employees.

Policy elements

The stages that may be followed when discipline is deemed necessary include the following:

1. Verbal warning
2. Corrective Actions/Counseling
3. Official written reprimand
4. Disciplinary meeting with appropriate supervisor or manager
5. Final written warning
6. Detraction of benefits
7. Indefinite suspension or demotion
8. Termination

The nature of the offense must be explained to the employee from the beginning of the procedure. The verbal warning may take the form of a simple oral reprimand but also a full discussion if that is necessary.

The employee must read and sign the written reprimand and final written warning. These documents include the time limit in which an employee must correct their conduct before we take further disciplinary action.

The following scenarios indicate where the disciplinary procedure starts depending on the violation:

Performance issues. Disciplinary procedure starts at stage 1. It includes but is not limited to:

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- Failure to meet performance objectives.
- Attendance issues.
- Failure to meet deadlines.

Misdemeanors/One-time minor offense. Disciplinary procedure starts at stage 1. It includes but is not limited to:

- Rude behavior to customers or partners.
- On-the-job minor mistakes.
- Breach of dress code/open door policy etc.
- Involuntary Discrimination

Misconduct/Frequent offender. Disciplinary procedure starts at stage 5. It includes but is not limited to:

- Lack of response to counseling and corrective actions.
- Lost temper in front of customers or partners.
- On-the-job major mistakes.
- Unwillingness to follow health and safety standards

Severe offensive behavior/Felony. Disciplinary procedure starts at stage 6. It includes but is not limited to:

- Corruption/ Bribery.
- Breach of employment agreement.
- Harassment/ Voluntary discrimination.
- Workplace Violence.
- Embezzlement/Fraud.
- Substance Abuse

Managers may choose to repeat stages of our disciplinary procedure as appropriate. This decision depends on employees' reaction to our disciplinary procedure, whether they repent their behavior and the nature of their offense.

Our disciplinary procedure begins when there is sufficient evidence to justify it. When there is suspicion or hints of misconduct, managers must investigate the matter first.

Appeals are allowed and must be filed to the management as soon as possible.

Managers should document every stage of our disciplinary procedure (except the verbal warning.) If appropriate, include necessary information like evidence, testimonies and employee's progress or improvement.



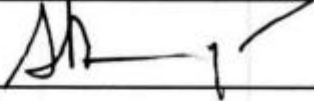


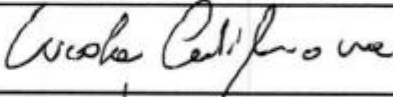

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We are obliged to refrain from disciplinary actions that may constitute retaliatory behavior. A no retaliation company policy will be always effective to ensure there is no misuse of our disciplinary procedure.

We have the right to modify this policy or act in any other legal or reasonable way as each case demands. But we will always enforce discipline in a fair and lawful manner.

Firma per presa visione:

Mr. Alexis Denna – Business Developer	
Mrs. Giada Cerinotti – Office Manager	
Mr. Antonio Covitti – Accounting Manager	
Mr. Nicola Castiglione – Sales Agent	
Mss. Alessandra Rondanina – Logistic Associate	
Mr. Simone Confalonieri – Logistic Associate	