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1. Introduction

Lazzerini aims to continuously encourage the improvement of individual conduct and performance in order to continually improve the work environment and personal and professional growth of the people who work for Lazzerini. This grievance procedure policy has been drawn up for the purpose of clearly outlining the procedure to be followed in the event of conduct contrary to the aforementioned purposes, as well as contrary to the model and policies adopted by Lazzerini, in order to ensure that all of our employees are heard and treated equally.

2. Purpose

The purpose of this policy is to (a) explain the scope and definition of grievances, (b) outline the process for reporting and closing a grievance, (c) define the company’s confidentiality measures, and (d) describe the disciplinary action steps for violations of the policies and regulations respectively in force.

3. Scope and addressees

This policy applies to all Lazzerini employees, including interns, volunteers, seasonal, full-time or part-time employees, with an open-ended and/or fixed-term contract (the “**Addressees**”).

Grievances can be filed against any Lazzerini employee, including senior management.

Lazzerini defines a “grievance” as a formal work-related complaint, issue and/or objection, as better described in point 4 below.

4. Grievance procedure

Any person who intends to file an official grievance complaint in relation to this policy, must first review the policies adopted by Lazzerini with respect to the subject matter of said grievance complaint.

Lazzerini encourages Addressees to resolve minor disputes with the help of a liaison officer, manager and a representative from the Human Resources (HR) department.

If the informal complaint is not fairly and constructively resolved within 15 working days, the Addressees may file a formal grievance.

Without prejudice to the Whistleblowing Policy adopted by Lazzerini, which shall remain applicable in full, Addressees may file a formal grievance when:

- they have been victims of workplace harassment, also pursuant to the Sexual Harassment Policy respectively adopted by Lazzerini;
- their health and safety have been compromised;
- they have witnessed poor behaviour adopted by Lazzerini supervisors and/or management, as well as by other Addressees;
- unjust changes are made (or threatened) to their employment contract;
- they have observed a violation of the guidelines set out in this policy;
- they are part of a dispute between colleagues, suppliers and/or management.

5. Filing a grievance

Addressees have the option to submit their grievance via email or by contacting the manager of the Lazzerini Human Resources department. If the Human Resources manager is a party to the grievance, addressees may contact the Managing Director.

Addressees may file the grievance by filling in the dedicated grievance complaint form enclosed with this policy as Annex A (the “**Grievance Complaint Form**”).

The Grievance Complaint Form must specify the following:

- Those involved in the grievance;
- The subject matter of the grievance (which must be compatible with the list in point 4 above);
- Any supporting documentation for the grievance.

Lazzerini is required to:

- accept and thoroughly investigate all Grievance Complaint Forms in the person of the HR department;
- ensure that the grievance is resolved within 15 working days, depending on the severity of each case. If the grievance is inadmissible, for any reason whatsoever, the HR department shall nonetheless inform the Addressee that filed the grievance regarding its inadmissibility;
- start an investigation aimed at determining the fact which is the subject matter of the grievance;
- treat all parties fairly throughout the grievance procedure;
- ensure that, within the limits of the respectively applicable legal and contractual provisions, the behaviour contested in the Grievance Complaint Form – where confirmed following an internal analysis – is immediately stopped and/or any disputes are settled.

In analysing the grievance and for the entire duration of the procedure, Lazzerini ensures:

- **confidentiality** of the facts referenced in the grievance, as well as of the parties involved in the actual grievance;
- not to apply any discriminatory and/or retaliatory measures against those involved in the grievance.

It is expressly understood that, should the grievance result in confirmation of conduct – by Addressees who are also employees – which is liable to disciplinary sanctions, the provisions set out in the Disciplinary Code respectively adopted by Lazzerini shall be applied in full.

6. Policy violations

If an Addressee, who is also an employee, is found to have violated this grievance procedure policy, they will be subject to disciplinary action, up to and including dismissal.

ANNEX A) GRIEVANCE COMPLAINT FORM

Person who files the grievance (Surname and Name)	
Date grievance filed	
Addressee of the grievance (please cross)	<input type="checkbox"/> Human Resources Manager <input type="checkbox"/> Managing Director

<p>Description of the facts and content of the grievance complaint</p>	
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