

Italian Workforce Anti-Discrimination Policy

Version 1.0 | Adopted on 11 August 2026

Everyone deserves equal opportunities

Italian Workforce stands for a labour market in which everyone receives equal opportunities. We select, place, and facilitate the employment of candidates solely based on objective, job-related criteria.

Discrimination, exclusion, harassment, and unequal treatment are not tolerated. This applies to our own employees, candidates, and temporary workers, as well as to our clients and other business partners.

For Italian Workforce, commercial interests never justify discrimination.

To whom does this policy apply?

This policy applies to:

- Italian Workforce employees and managers;
- candidates and temporary workers;
- hired professionals working on behalf of Italian Workforce;
- clients, suppliers, and other business partners.

The policy applies throughout the entire process of recruitment, selection, placement, remuneration, guidance, career progression, and the termination of an employment relationship or assignment.

What do we define as discrimination?

Discrimination may occur when someone is directly or indirectly excluded, disadvantaged, or treated differently due to a personal characteristic that is irrelevant to the job.

This includes distinctions based on:

- origin, skin colour, race, or nationality;
- age;
- sex, pregnancy, gender identity, or gender expression;
- religion or belief;
- political conviction;
- sexual orientation;

- marital status;
- disability or chronic illness;
- working hours;
- temporary or permanent employment status.

A requirement that appears neutral at first glance can also be discriminatory if it unnecessarily disadvantages specific groups. Job requirements must therefore always be necessary, appropriate, and capable of objective justification.

Objective recruitment and selection

Italian Workforce assesses candidates solely based on criteria relevant to the work involved. Examples include education, work experience, professional proficiency, certifications, competencies, and availability.

Language proficiency, physical stamina, travel time, or availability may only be used as selection criteria if demonstrably necessary and proportionate to the role.

Personal characteristics irrelevant to the work are not used in the selection or nomination of candidates.

Discriminatory requests from clients

Italian Workforce does not comply with discriminatory requests from clients.

Examples include requests to:

- not propose older candidates;
- select only candidates of a specific nationality;
- exclude candidates wearing a headscarf;
- place only a man or a woman without an objective necessity;
- exclude candidates with an accent;
- select someone based on a veiled 'cultural preference'.

When a client makes a potentially discriminatory request, our staff member first asks about the specific tasks or competencies underlying the request. Where possible, a legitimate need is translated into an objective and verifiable job requirement.

If the discriminatory criterion persists:

- Italian Workforce refuses the request;
- no candidate is selected based on this criterion;
- the request is registered internally and escalated;

- a decision is made regarding necessary measures to be taken with the client.

Depending on the severity and recurrence, Italian Workforce may address the issue with the client, establish additional agreements, refuse an assignment, or suspend or terminate the collaboration.

Workplace Conduct

Workplace behavior

Italian Workforce does not tolerate discriminatory remarks, harassment, or unequal treatment of candidates, temporary workers, or employees by clients, colleagues, or other parties involved.

Reports are investigated thoroughly. If an individual's safety or dignity is compromised, Italian Workforce may immediately suspend the assignment. Protecting the individual involved takes precedence over the commercial interests of an assignment.

Reporting or Filing a Complaint

Any employee, candidate, temporary worker, client, or other involved party may report suspected discrimination, a discriminatory request, or inappropriate behavior.

Reports or complaints may be submitted to:

Paloma van Wel

Confidential Advisor and Point of Contact

paloma@italianworkforce.nl

If the complaint concerns Paloma van Wel or involves a conflict of interest, the complaint may be submitted directly to:

Marcel Massar

Person ultimately responsible for anti-discrimination policy

marcel@italianworkforce.nl

If the complaint concerns Marcel Massar, or if he is unable to handle the complaint impartially, Italian Workforce will engage an independent external advisor. The person filing the report will be informed in writing of the chosen procedure and the expected timeframe for handling the matter.

Anonymous reports are investigated as thoroughly as possible. However, anonymity can limit the scope for investigation and feedback.

Handling of reports and complaints

Italian Workforce adheres to the following principles:

- Receipt of a complaint is generally acknowledged within five working days.
- The person making the report is given the opportunity to explain the situation and the desired outcome.
- The complaint is handled by someone with no conflict of interest.
- All parties directly involved are given the opportunity to present their views.
- Temporary protective measures are taken where necessary.
- The person making the report generally receives a substantiated response within four weeks.
- If more time is required, the person making the report receives an explanation and a new timeframe.

Reports are processed carefully, confidentially, and using the minimum amount of personal data necessary. Access is restricted to individuals who require the information for handling the matter or making decisions.

No one may be disadvantaged, intimidated, or treated differently for submitting a report or complaint in good faith.

External options

A person making a report is always free to seek advice or submit a report or complaint to an external organization. Submitting an internal report to Italian Workforce is not a mandatory prerequisite for doing so.

Possible external channels include:

- Discriminatie.nl for advice, support, or reporting discrimination;
- the Netherlands Institute for Human Rights (College voor de Rechten van de Mens) for information and—where the situation falls within its jurisdiction—requesting a formal opinion;
- legal counsel or other competent authorities, depending on the situation.

Consequences of non-compliance

Employees who fail to comply with this policy may be addressed regarding their conduct and receive additional instruction or coaching. Depending on the severity, culpability, consequences, and any recurrence, employment-related or contractual measures may also be taken. Deliberately acting upon or concealing a discriminatory request, disadvantaging a person who files a report, and refusing to cooperate with an investigation are considered serious violations.

Clients and other business partners may also be issued a warning, temporarily blocked, or have their business relationship terminated.

Instruction and periodic monitoring

Italian Workforce employees receive this policy and are instructed on:

- recognizing discrimination;
- objective recruitment and selection;
- handling discriminatory requests;
- reporting, recording, and escalating;
- complaints handling.

Italian Workforce periodically monitors compliance with the policy in practice. The policy's effectiveness is evaluated at least once a year and following any serious incident. Improvement measures, responsible parties, and timeframes are documented in writing.

Availability and updates

This public version outlines Italian Workforce's key principles and procedures. The full anti-discrimination policy is available free of charge upon request via paloma@italianworkforce.nl.

The policy is reviewed—and amended where necessary—at least annually, as well as whenever there are relevant changes to legislation, regulations, or NBBU requirements.

Document owner: Marcel Massar

Confidential advisor and point of contact: Paloma van Wel

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