



INTERNAL POLICY

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1. COMING INTO EFFECT

From 01.01.2019 the company Mission Consultancy Assistance Engineering Srl (abbreviated as MCA Srl or MCA) will apply, in addition to the provisions of the legislation and the collective agreement of reference, the following Internal Regulations for persons active in the headquarters of MCA.

2. WORKING HOURS

The weekly working time for full-time staff is 40 hours. This working time is considered to be the actual working time.

The working hours are individually defined in the work contract. Normal full-time working hours are 8 hours per day, 5 days per week. Travel time is not regarded as working time.

The worker is required to respect the working hours and any violation or non-compliance is a reason for disciplinary dispute. Access to offices outside working hours is forbidden.

During working hours, employees may only leave the premises where their work usually takes place if there is a justified and justifiable personal need or for work purposes (and therefore following specific company regulations).

Any outings during working hours must be authorized in advance by the person in charge.

A 10-minute break is allowed during working hours. The usual schedule is from 09:00 to 18:00.

After 2 hours of continuous work, employees working with video terminals must in any case carry out a different activity for at least 10 minutes.

The lunch break is usually 1 hour between 13:00 and 14:00.

Compatibly with the company's needs, and with a view to guaranteeing the company's operations as a whole, different entry and exit times can be agreed upon from the official one.

Any delay of less than 15 minutes with respect to the official time must be recovered during the day; any delay of more than 15 minutes will result in the application of the 30-minute recovery rule.

In cases where delays are not compensated by job recoveries in the way described above, the relevant and proportional pay deductions will apply.

Recovery is not permitted for delays of more than thirty minutes.

3. ABSENCES, HOLIDAYS AND PERMITS

3.1. Sickness

In order to allow a timely verification of the presence, each worker, as soon as he or she becomes aware that he or she is unable to go to work, must promptly notify the Managing Director and the HR department.

In case of illness, the worker must inform the company within the first day of absence and send, within the second day of the beginning of the absence, the telematic transmission code of the certificate issued by the attending doctor. Any continuation must be notified to the company by the first day on which the worker should have resumed service and must be certified by medical certificates.

It is the employee's responsibility to comply with both MCA Engineering's regulations and legal regulations of Italy with regard to notification and certification of sickness. Failure to do so could result in salary payments being suspended.

When the employee is sick the cost allowance is immediately suspended for the rest of the duration of the sickness. In addition, MCA Engineering reserves the right (at any time after two week's sickness) to:

- Request the return of the lease car so that it can be made available for use by other MCA Engineering employees. No compensation will be paid for loss of private usage of the lease car.
- Request the return of hardware/software or any other MCA Engineering property.

If requested by MCA Engineering, the employee is obliged to return the lease car, hardware/software or any other MCA Engineering property within 24 hours of such request.

3.2. Paid holiday

The employer is responsible, pursuant to Article 2109 of the Italian Civil Code, for establishing the period of vacation and the relative procedures, compatibly with the needs of the company. The latter shall be responsible for indicating (in any case optional) the period within which each person intends to take annual rest.

By May of each year, employees may submit their holiday/permit plan proposal, according to the procedures identified and then communicated by the administration (human resources office).

The employer's power to determine the period for which leave is taken also implies the power to change it on the basis of a reconsideration of the company's needs. The employer is, however, obliged to notify the change with adequate notice.

Full-time employees have the right to paid holiday, initially at the rate of 22 working days per annum.

Part-time employees have the right to paid holiday, on a pro-rata basis (rounded up to the nearest half-day).

Holiday taken may be recorded as one whole day or one half-day, but not less than this.

MCA Engineering encourages employees to take their holiday in full. Taking holidays or carrying them over to the next year, must be done in a reasonable way and MCA's constraints must be considered.

Holidays of the previous year have to be taken until the 30th of June, otherwise they will be lost.

For a holiday lasting more than 5 working days, the employee is required to give MCA Engineering 15 days' notice of an intended holiday.

3.3. Suppressed Holidays

Suppressed holidays that are not taken during the year will postpone until 30th of June of the next year, otherwise they will be lost.

3.4. Public holidays

01/01: Capodanno

06/01: Epifania

X: Pasquetta

25/04: festa della Liberazione

01/05: Festa dei lavoratori

02/06: Festa delle Repubbliche

15/08: Assunzione

16/08: (per la sede di Milano) Festa del Commercio

01/11: Tutti i santi

08/12: Immacolata concezione

25/12: Natale

26/12: Santo Stefano

X : Santo Patrono Torino, Milano, Roma

When any of these falls on a non-working day, no day off is given automatically in lieu.

3.5. Unpaid leave

Unpaid leave may be taken with the written approval of the Managing Director.

For the ease of the administration, normal paid holiday entitlement should be used up first (including any days brought forward from the previous year) before unpaid leave days are taken.

Withholding of salary for unpaid leave will occur in the month in which the unpaid leave days are taken.

An employee is required to give MCA Engineering at least 30 days' notice if he plans to take unpaid leave.

4. INTERNET AND MAILBOX USE

Cf MCA Groupe regulation and available on the intranet

5. BEHAVIOURAL PROVISIONS

Employees are required to use their workstations with the utmost care and skill, as well as the instrumentation and equipment necessary to perform their duties, taking care to rearrange everything at the end of their working day.

Eating food in the workplace is permitted within the limits of decorum and respect for colleagues.

The same care and attention must also be respected in the common areas, with particular attention to the environments and the rules in force at the offices of the customers of MCA.

It is absolutely forbidden to move or modify the disposition of everything that constitutes an accident prevention device or in any case is intended for the protection of safety in the workplace.

In the event of an accident at work, the first-aid officer and the person hierarchically in charge of the department or sector must be notified immediately. The MCA Managing Director must be informed.

No strangers may be brought into the work environment, except in places duly designated for reception.

The organizational communications to which the workers must adhere are those imparted by the hierarchically pre-arranged superiors, the heads of service of the departments or offices, the heads of human resources or other subjects designated by them; any other information coming from other personnel, however unauthorized, is to be considered as lacking in effectiveness and foundation.

To the same subjects mentioned above, the workers can turn to present their requests, as well as to report any inconvenience or critic found in the company activity; any information of this type not provided to the figures just identified will be unproductive of any effect.

The worker must perform all his services with the utmost care and expertise, taking into account the tasks for which he is hired, and therefore the degree of professionalism and responsibility embodied by his role.

The behavior to be adopted with regard to the workers at all levels and for all reasons working in the company must be based on the canons of ethical correctness, and at the same time the provisions of these regulations must be respected, as well as those of service imparted and established by the heads of each department or office, or even before that, by the company property.

In addition, workers are required to read and comply punctually with the provisions and prohibitions contained in the disciplinary code, for which reference is made in full to articles 220 to 227 of the "Tertiary" National Collective Labor Agreement contained in Annex 2 to these Regulations.

The work must be carried out in the interest of the company, and therefore aimed at achieving the best quality standards, to allow an ever-increasing customer satisfaction.

Workers are also required to observe in the most absolute manner the principle of confidentiality and loyalty enshrined in Article 2105 of the Civil Code.

The clothing to be worn during the performance of the work must be appropriate to the type of task performed.

Personnel must comply with the provisions on safety in the workplace and with the instructions and indications of the staff in charge, taking into account the tasks carried out.

The company mobile phone, if assigned, is used exclusively for organizational functions, in the interest of the company and to allow the worker to fully and optimally perform his functions. During the period of professional use, the worker is the custodian of the telephone and for this reason he must promptly report any theft or damage to the same. The assignment can be revoked in the event of a change of duties, if the new assignment is not necessary.

Due to the exclusively professional use, the company has the right to verify the flow of calls in order to highlight any misuse of the device.

The company and the worker may agree to the use of the personal mobile phone also for work purposes, with consequent reimbursement of the relative costs by the company.

It is forbidden for personnel to return to the premises of the company or of third party customers and to remain beyond the prescribed time (except in the case of overtime), except for reasons of service and with the authorization of the Company.

It is the duty of the staff to inform the company immediately of any change of residence, both during service and during leave.

The staff is responsible for the material and tools they have received to carry out their work. Each employee must keep the material, carry out appropriate maintenance, store it and use it with normal care and diligence. The above also includes company vehicles (cars, vans, etc.). In the event of breakage, damage or loss of the material referred to above, the employee is due to pay compensation to the extent to be determined at the time of the incident, without prejudice to the disciplinary measures provided for by the contractual regulations in force.

In the event of theft, as well as in the case of ascertained damage, by third parties, the staff is required to promptly notify the Company, demonstrating that they have used normal diligence.

6. COMPENSATION AND BENEFITS

6.1. Bonus scheme

The bonus is performance related and amounts are at the discretion of the Managing Director. Targets are defined by superiors and MCA Engineering Management Board.

Employees who have left, given notification of resignation, or been given formal notice to leave MCA Engineering before the end of the period of the bonus letter will lose their bonus entitlement over that period.

6.2. Bonus for Business Managers

Bonuses for Business Managers are based on quantitative and/or qualitative targets stated in a yearly Bonus Letter. Bonus is paid monthly from the results calculated in the previous month. Adjustment may be made after reconciliation of sales results.

6.3. Bonus for Recruitment Staff

Bonuses for Recruitment Staff will be based on quantitative and/or qualitative targets stated in a Bonus Letter. Bonus is calculated on a semester basis, January to June and July to December. Bonus is calculated monthly and payment takes place every month. Adjustment may take place after reconciliation of the results in July for the first semester and over the second semester in January of the following year.

6.4. Other Bonuses

Payment of extra bonuses may occur at the sole discretion of the MCA Engineering Management Board, and is a reward for excellent performance and not an entitlement.

7. Expenses

The basic principle underlying MCA Engineering's expense policy is that employees should be reimbursed for expenses incurred in carrying out MCA Engineering's business, over and above the expense they would normally incur in working at MCA Engineering offices.

MCA Engineering will reimburse expenses reasonably incurred in business trips or business lunches or dinners. **All such expenses must first be agreed by the Managing Director.** Employees are expected to use their judgment in deciding whether an item should reasonably be claimed as an expense and also how much that item should cost. MCA Engineering relies on the employee's common-sense and discretion in avoiding excessive expenses. Expenses will be reimbursed at cost.

When making expense claims, employees are required to complete the **document "bill of expenses"**. **All original receipts**, which show the amount of VAT, must be attached to the "bill of expenses" on an additional blank paper. Please **number the attached receipts** (1, 2, 3 ...) and indicate it correspondingly in the correct column on the "bill of expenses". Do **not sum up any amounts** and indicate everything individually. The completely filled-in form must be **signed by the employee**. It is important that the receipts are **addressed to MCA Engineering** and the employee. The claim of expenses are not accepted without a signature and the original receipts.

Expenses arising from business meals should indicate clearly with whom the meal took place and the reason for the meeting.

“Bill of expenses” should be submitted the soonest. This gives the management staff sufficient time to sign them and to send them to Financial Administration, who will pay the approved expenses once a month.

When leaving the employment of MCA Engineering, money can be withheld from the salary of the employee to cover any extra costs which may come in, e.g. fines, damage to or loss of MCA Engineering property.

If required documents are correctly handed in on time, the expenses get reimbursed in the following months.

Please contact the supplier and expenses department if you have any questions concerning your handed-in documents.

8. BUSINESS TRIPS

8.1.General

Business trips are irregular travels which require the approval of the Managing Director. In order to get the approval of the Managing Director, the employee must fill in and sign the document “Business Trip Authorizations” and submit it to the Managing Director. Normally travel arrangements are booked by the employee itself. In the case of high costs, advances (see below) are possible.

8.2.Insurance

MCA Engineering provides a collective travel insurance within the European Union for all employees. The cover is for business trips only. For more details, please contact Personnel Administration

8.3. Methods of reimbursement

If workers are sent to Italy outside the municipal territory of their place of work or abroad, they are entitled to reimbursement of travel, board and lodging expenses, in accordance with the applicable national collective labor agreement, within the limits set out below.

Reimbursement will be made upon presentation of a suitable expense note accompanied by supporting documents for expenses, which must be delivered no later than the end of the month in which the trip took place; if this is not the case, the summary note will not be considered and expenses already incurred by the Company and not documented within the same period will be charged to the worker.

8.4.Travel expenses

Reservations for airline tickets, train tickets and car rentals will normally be made by the company,

Air travel: Employees are expected to claim for second class only at the cheapest rate available. Exceptions must have the prior approval of the Managing Director.

Public transportation: When travelling by train or by bus for business purposes, employees are expected to claim second class tickets only.

Road travel: If you need a car to travel, you must first check the availability of company cars and, only if they are not available, you can use your own car with the permission of your manager.

In case of use of own means, the refund will be subject to the following conditions:

- Vehicle type - the copy of the vehicle registration document must be provided at the beginning of the contract
- Introduction of mileage in expense reports

For mileage reimbursement, MCA will systematically refer to the national tables of mileage operating costs for cars and motorcycles drawn up by the ACI.

Any motorway toll will be reimbursed upon presentation of payment receipts. The Company will reimburse the expenses incurred for garages and car shelters.

In the case of transfers that require the use of a company car/personnel, the worker must scrupulously comply with the provisions of the Highway Code.

Any fines and penalties attributable to the same for conduct contrary to traffic regulations, will be borne exclusively by the offender.

The use of the taxi will be allowed only in the cases strictly necessary.

Car rental: A car may be rented when the business location is not easily accessible by public transport and it is less expensive to rent a car than to use a taxi or private car. In this case, the costs get fully reimbursed.

MCA Engineering will not pay fines of any description. Fines charged to MCA Engineering directly will be deducted from employees' salary.

8.5. Accommodation and board expenses

The reservation of a possible overnight stay including breakfast, will be made directly by the company,

Hotel Costs

For assignments where it is impractical to travel home each day, the costs for hotel accommodation and meals get reimbursed after the previous approval of the Managing Director.

No expenses other than those indicated above, such as telephone and minibar, will be reimbursed.

Food expenses will be reimbursed, except for lunches and/or dinners of representation previously authorized, within the maximum limits of table 1.

Tabel	n.	1	Lunch	€ 8,00
			Supper	€ 25,00

The company has the right to grant the employee sent on mission a credit card whose expenses will be debited directly from the bank account of the worker at the end of the month following that of the expenditure made.

8.6. Cash advances for missions abroad

Workers travelling abroad may request advance payment of their expenses with at least five working days' notice prior to departure and with authorization from the responsible person.

The amount advanced cannot be used for personal expenses.

Unused amounts will be automatically compensated by the monthly salary or by the advance payment of next trips.

8.7. Documentation of expenses

All expenses incurred in travel and mission by the worker for the provision of goods and services (such as hotels, restaurants, etc..) must be strictly justified in the form of an invoice or in the absence of a tax receipt,

made out to Mission Consultancy Assistance Engineering Srl - Tax Code and VAT number 11447960011, or in the form of a receipt.

All documentation must be attached to the Expense Reimbursement Form in order to justify the expenses and deduct VAT.

8.8. Duties of posted workers

During the mission, the workers must comply with the company directives as well as the obligations of diligence, loyalty, loyalty and confidentiality provided for in articles 2104 and 2105 of the Civil Code.

9. MANAGEO

MANAGEO is the Content Management System of MCA Engineering and a very important tool for every headquarter employee. It collects and provides information about all relevant issues.

The following information have to be entered and updated in MANAGEO:

- Interviews with candidates
- Company profiles and data about the client
- Needs of clients and updated statuses
- Prospection meetings with a link to the client profile and updated reviews
- Qualification meetings with a link to the client profile, the need, and the consultants / candidates profile
- Recruitments
- Projects with a link to the need, the client, and the consultant
- Update of all the new information on the projects (rate change, end of project etc.)

It is very that all the information in MANAGEO are up to date, because they are the basis of different departments within the company.

CCNL TERZIARIO - Confcommercio

Capo XXI

DOVERI DEL PERSONALE E NORME DISCIPLINARI

Art. 220

(Obbligo del prestatore di lavoro)

Il lavoratore ha l'obbligo di osservare nel modo più scrupoloso i doveri e il segreto di ufficio, di usare modi cortesi col pubblico e di tenere una condotta conforme ai civici doveri.

Il lavoratore ha l'obbligo di conservare diligentemente le merci e i materiali, di cooperare alla prosperità dell'impresa.

Art. 221

(Divieti)

E' vietato al personale ritornare nei locali dell'azienda e trattenersi oltre l'orario prescritto, se non per ragioni di servizio e con l'autorizzazione della azienda, salvo quanto previsto dall'art. 30, del presente contratto. Non è consentito al personale di allontanarsi dal servizio durante l'orario se non per ragioni di lavoro e con permesso esplicito.

Il datore di lavoro, a sua volta, non potrà trattenere il proprio personale oltre l'orario normale, salvo nel caso di prestazione di lavoro straordinario.

Il lavoratore, previa espressa autorizzazione, può allontanarsi dal lavoro anche per ragioni estranee al servizio. In tal caso è in facoltà del datore di lavoro richiedere il recupero delle ore di assenza con altrettante ore di lavoro normale nella misura massima di un'ora al giorno senza diritto ad alcuna maggiorazione.

Al termine dell'orario di lavoro, prima che sia dato il segnale di uscita, è assolutamente vietato abbandonare il proprio posto.

Art. 222

(Giustificazione delle assenze)

Salvo i casi di legittimo impedimento, di cui sempre incombe al lavoratore l'onere della prova, e fermo restando l'obbligo di dare immediata notizia dell'assenza al datore di lavoro, le assenze devono essere giustificate per iscritto presso l'azienda entro 48 ore, per gli eventuali accertamenti.

In relazione alla giustificazione delle assenze in caso di malattia, e fermo restando l'obbligo di dare immediata notizia dell'assenza al datore di lavoro, quanto previsto dal presente si realizza anche mediante la comunicazione scritta, a mezzo di fax, mail certificata o raccomandata, del numero di protocollo identificativo del certificato medico inviato per via telematica dal medico all'INPS.

Nel caso di assenze non giustificate sarà operata la trattenuta di tante quote giornaliere della retribuzione di fatto di cui all'art. 195, quante sono le giornate di assenza, fatta salva l'applicazione della sanzione prevista dal successivo art. 225.

Art. 223

(Rispetto orario di lavoro)

I lavoratori hanno l'obbligo di rispettare l'orario di lavoro. Nei confronti dei ritardatari sarà operata una trattenuta, che dovrà figurare sul prospetto paga, di importo pari alle spettanze corrispondenti al ritardo, fatta salva l'applicazione della sanzione prevista dal successivo art. 225.

Art. 224

(Comunicazione mutamento di domicilio)

E' dovere del personale di comunicare immediatamente all'azienda ogni mutamento della propria dimora sia durante il servizio che durante i congedi.

Il personale ha altresì l'obbligo di rispettare ogni altra disposizione emanata dalla azienda per regolare il servizio interno, in quanto non contrasti con le norme del presente contratto e con le leggi vigenti, e rientri nelle normali attribuzioni del datore di lavoro.

Tali norme dovranno essere rese note al personale con comunicazione scritta o mediante affissione nell'interno dell'azienda.

Art. 225

(Provvedimenti disciplinari)

La inosservanza dei doveri da parte del personale dipendente comporta i seguenti provvedimenti, che saranno presi dal datore di lavoro in relazione alla entità delle mancanze e alle circostanze che le accompagnano:

- 1) biasimo inflitto verbalmente per le mancanze lievi;*
- 2) biasimo inflitto per iscritto nei casi di recidiva delle infrazioni di cui al precedente punto 1;*
- 3) multa in misura non eccedente l'importo di 4 ore della normale retribuzione di cui all'art. 193;*
- 4) sospensione dalla retribuzione e dal servizio per un massimo di giorni 10;*
- 5) licenziamento disciplinare senza preavviso e con le altre conseguenze di ragione e di legge.*

Il provvedimento della multa si applica nei confronti del lavoratore che:

- ritardi nell'inizio del lavoro senza giustificazione, per un importo pari all'ammontare della trattenuta;*
- esegua con negligenza il lavoro affidatogli;*
- si assenti dal lavoro fino a tre giorni nell'anno solare senza comprovata giustificazione;*
- non dia immediata notizia all'azienda di ogni mutamento della propria dimora, sia durante il servizio che durante i congedi.*

Il provvedimento della sospensione dalla retribuzione e dal servizio si applica nei confronti del lavoratore che:

- arrechi danno alle cose ricevute in dotazione ed uso, con dimostrata responsabilità;*
- si presenti in servizio in stato di manifesta ubriachezza;*
- commetta recidiva, oltre la terza volta nell'anno solare, in qualunque delle mancanze che prevedono la multa, salvo il caso dell'assenza ingiustificata.*

Salva ogni altra azione legale, il provvedimento di cui al punto 5 (licenziamento disciplinare) si applica esclusivamente per le seguenti mancanze:

- assenza ingiustificata oltre tre giorni nell'anno solare;*
- recidiva nei ritardi ingiustificati oltre la quinta volta nell'anno solare, dopo formale diffida per iscritto;*
- grave violazione degli obblighi di cui all'art. 220, 1° e 2° comma;*
- infrazione alle norme di legge circa la sicurezza per la lavorazione, deposito, vendita e trasporto;*
- l'abuso di fiducia, la concorrenza, la violazione del segreto d'ufficio;*
- l'esecuzione, in concorrenza con l'attività dell'azienda, di lavoro per conto proprio o di terzi, fuori dell'orario di lavoro;*

- la recidiva, oltre la terza volta nell'anno solare, in qualunque delle mancanze che prevedono la sospensione, fatto salvo quanto previsto per la recidiva nei ritardi.

L'importo delle multe sarà destinato al Fondo pensioni dei lavoratori dipendenti. Il lavoratore ha facoltà di prendere visione della documentazione relativa al versamento.

Art. 226

(Codice disciplinare)

Ai sensi e per gli effetti dell'art. 7 della legge 20 maggio 1970, n. 300, le disposizioni contenute negli articoli di cui al presente Capo XXI nonché quelle contenute nei regolamenti o accordi aziendali in materia di sanzioni disciplinari devono essere portate a conoscenza dei lavoratori mediante affissione in luogo accessibile a tutti.

Il lavoratore colpito da provvedimento disciplinare, il quale intenda impugnare la legittimità del provvedimento stesso, può avvalersi delle procedure di conciliazione previste dall'art. 7, legge 20 maggio 1970, n. 300 o di quelle previste dalla Sezione terza, del presente contratto.

Art. 227

(Normativa provvedimenti disciplinari)

L'eventuale adozione del provvedimento disciplinare dovrà essere comunicata al lavoratore con lettera raccomandata con avviso di ricevimento o altro mezzo idoneo a certificare la data di ricevimento, entro 15 giorni dalla scadenza del termine assegnato al lavoratore stesso per presentare le sue controdeduzioni.

Per esigenze dovute a difficoltà nella fase di valutazione delle controdeduzioni e di decisione nel merito, il termine di cui sopra può essere prorogato di 30 giorni, purché l'azienda ne dia preventiva comunicazione scritta al lavoratore interessato.

**DICHIARAZIONE DI PRESA VISIONE
E ACCETTAZIONE DELLA POLICY INTERNA**

Io sottoscritto/a _____

nato/a a _____ (___)

il _____

consapevole che chiunque rilascia dichiarazioni mendaci è punito ai sensi del codice penale e delle leggi in materia, ai sensi e per gli effetti dell'art.46 del D.P.R. n.445/2000

DICHIARO SOTTO LA MIA PERSONALE RESPONSABILITA'

1) di aver preso visione e di accettare integralmente la policy interna di MCA Engineering s.r.l.

2) di possederne una copia cartacea e/o elettronica e di impegnarsi a rispettare le prescrizioni contenute nel suddetto documento.

Data_____

Luogo_____

Firma
