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Iscritta al n. 148084 del REA di Novara



# Gorgonzola

## WORKFORCE POLICY





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## 1. Introduction

**IGOR S.r.l.** and its subsidiaries (hereinafter also referred to as 'IGOR' or the 'Group'), long committed to the production of Gorgonzola PDO, acknowledge that their workforce is a cornerstone of the company's success and growth. The Group has consistently prioritised safe, fair and respectful working conditions, placing the protection and well-being of its employees at the heart of its operations. Through this Workforce Management Policy (hereinafter referred to as the "Policy" or the "Document"), IGOR articulates and formalises its commitment to fostering a working environment where every individual feels valued, heard and protected, within a framework that promotes mutual respect, safety and inclusivity.

In upholding this commitment, IGOR aligns with the principles outlined in its **Code of Ethics** and the international provisions contained in the **Conventions of the International Labour Organisation (ILO)**, the **European Social Charter** and the **International Covenant on Economic, Social and Cultural Rights (ICESCR)**. The Group, therefore, implements practical and effective measures to ensure the respect and protection of workers' rights at every stage of their professional journey within the company. The commitment to a safe and fair working environment extends to all areas of operation, with a focus on health and safety, work-life balance, training and professional development. The Group is also committed to ensuring equal opportunities for all employees, promoting an inclusive environment that values diversity and encourages fair and respectful treatment, free from any form of discrimination.

IGOR's core values - Passion, Tradition, Excellence, Innovation and Social Responsibility - serve not only as benchmarks for the quality of its products, but also as the foundation of its corporate culture. **Passion** for the quality of Gorgonzola PDO translates into respect for each person who contributes to its production. The **Tradition** of a company deeply rooted in ancient knowledge is seamlessly combined with a culture of respect and appreciation for every employee. **Excellence**, pursued not only in production but also in upholding human rights and values, is the principle that guides every aspect of the company's operations. **Innovation**, which drives the Group's continuous evolution,





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ensures the development of increasingly safe and people-focused working environments. Finally, **Social Responsibility** is reflected in actions aimed at promoting inclusivity and well-being of all IGOR employees.

Through this Policy, IGOR reaffirms its commitment to providing every employee with a work environment that respects their rights, while fostering the growth and well-being of all those who contribute to the Group's success. This Policy embodies an ongoing commitment to enhancing working conditions and upholding high ethical and social standards, with the goal of valuing each individual and fostering a healthy, inclusive working environment.

## Recipients and Scope of Application

The scope of application of this Workforce Management Policy includes, without limitation, the entire Igor Group, comprising the company IGOR S.r.l., its subsidiaries, and all associated offices and operating structures. The recipients of the Policy are specifically:

- **Employees:** Every individual working within IGOR, at any level, is a recipient of this Policy. Each employee is also responsible for actively contributing to the promotion and adherence to the principles outlined in this Document, by incorporating them into their daily work.
- **Executives and Managers:** Supervisory and management personnel within the Group are entrusted with the responsibility of implementing and monitoring company policies, serving as role models in fostering a culture of mutual respect, inclusivity, and safety.
- **Directors and Auditors:** Persons entrusted with governance functions within the company must act with consistency and integrity, fully aligning themselves with the principles outlined in this Policy.

All individuals operating within IGOR in these capacities are collectively referred to as the '**Recipients.**' IGOR is committed to ensuring that the responsibility to uphold and promote these principles is embraced and disseminated across every level of the



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organisation. Under no circumstances can the pursuit of corporate interests justify actions that contravene the principles outlined in this Policy. For IGOR, all success and growth must be based on the unwavering respect for the dignity and rights of workers, at every stage of its activities and across all areas of its operations.

## Policy Objectives, International Standards and References

**The primary objective of** this Policy is to promote responsible, fair and safe management of IGOR's workforce, ensuring that every activity respects the fundamental rights of workers while fostering a working environment that prioritises inclusivity, health and safety. Through this Policy, IGOR aims to formalise its commitment to ensuring working conditions that protect the safety and well-being of employees, while preventing any form of discrimination, harassment or violence. The Group strives to ensure that every worker receives fair wages, reasonable working hours, and a healthy work-life balance, while upholding the principles of gender equality and equal pay for work of equal value. Furthermore, the Policy seeks to promote opportunities for continuous training and development, enabling each employee to advance in their career and refine their skills. Furthermore, IGOR is committed to fostering an inclusive working environment where every individual, regardless of their characteristics, is respected and fully valued. To achieve this, freedom of association, social dialogue, and the active participation of workers in company decisions are fundamental principles for promoting an open and collaborative corporate culture that respects the rights and opinions of all employees.

To ensure the effectiveness of this Policy, IGOR draws inspiration from a series of consolidated and universally recognised international standards, which underpin its commitment to respecting workers' rights, including:

- **The International Labour Organisation (ILO) Conventions** which comprehensively address workers' rights, including those relating to freedom of association, non-discrimination and safe and decent working conditions<sup>1</sup>;
- The UN **Sustainable Development Goals (SDGs)**, in particular **Goal 8** on decent work and economic growth, which promotes safe work policies, development opportunities and protection of workers' rights<sup>2</sup>;

<sup>1</sup> Conventions and protocols

<sup>2</sup> The new 2030 Agenda for Sustainable Development





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- **European Union labour directives and regulations**, such as **Directive 2003/88/EC**<sup>3</sup> on working time, which sets limits on working hours and ensures adequate rest periods, **Directive 2010/18/EU**<sup>4</sup> on work-life balance, which promotes policies to encourage a work-life balance, **Directive 2006/54/EC**<sup>5</sup> on **gender equality**, which promotes equal treatment and opportunities between men and women, including equal pay for equal work or work of equal value;
- **Legislative Decree No. 81 of 9 April 2008** (hereinafter also referred to as L.D. 81/2008") regulates health and safety in the workplace, establishing obligations for the protection of workers and the assessment of company risks<sup>6</sup>;
- **Regulation (EU) 2016/679** of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data (GDPR), which lays down strict rules for the protection of workers' personal data<sup>7</sup>.

In doing so, the Group is committed to creating a working environment that respects the rights and value of every employee, following international best practices and aligning with global standards in all areas of its operation.

<sup>3</sup> EUR-Lex - L:2003:299:TOC - EN - EUR-Lex

<sup>4</sup> Council Directive 2010/18/EU of 8 March 2010 implementing the revised Framework Agreement on parental leave concluded by BUSINESSEUROPE, UEAPME, CEEP and ETUC and repealing Directive 96/34/CE Text with EEA relevance

<sup>5</sup> [eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32006L0054](http://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32006L0054)

<sup>6</sup> Official Gazette

<sup>7</sup> REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL - of 27 April 2016 - on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)



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## 2. The Main Topics in Workforce Matters

In line with the relevant international standards, IGOR's commitment focuses primarily on the **management and mitigation of key workforce-related impacts**, with the aim of ensuring fair, safe and inclusive working conditions for all employees. To identify the most relevant impacts for the Group, we take into account the activities performed, the specific contexts in which the Group operates, and recommendations from international sources, such as the Conventions of the International Labour Organisation (ILO)<sup>8</sup>, the Global Rights Index of the International Trade Union Confederation (ITUC)<sup>9</sup>, as well as national regulations, including Legislative Decree 81/2008<sup>10</sup>. These tools assist IGOR in identifying the key impacts related to workforce management, which the Group addresses with particular care and attention.

IGOR is dedicated to preventing and mitigating the primary negative impacts on workers across its operations, striving to protect individuals, promote well-being, and minimize the associated risks for the Group. IGOR takes into account the following impacts on workers' rights and welfare:

1. **Negative impacts on working conditions, including health and safety**
2. **Negative impacts on equal treatment and opportunities for all workers**
3. **Negative impacts on other labour-related rights, such as freedom of expression, freedom of association and the right to collective bargaining**
4. **Violence and harassment in the workplace**
5. **Negative impacts on employees' privacy and/or sensitive data**

In addition to the specific issues addressed, IGOR reaffirms its commitment to cross-cutting issues that it considers fundamental, as highlighted in the next section entitled 'General Principles'. The company actively promotes these principles and requires strict compliance with them internally.

<sup>8</sup> List of ILO conventions

<sup>9</sup> 2024\_ituc\_global\_rights\_index\_en.pdf

<sup>10</sup> LEGISLATIVE DECREE no. 81 of 28 February 2000





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## 3. General Principles

### Decent Working Conditions

IGOR is committed to ensuring **decent working conditions** for all its employees, guaranteeing that all employment relationships are properly formalized and comply with current regulations, particularly those concerning **job security, employment contracts, working hours, rest periods, and holidays**. The Group strictly prohibits any form of irregular employment, ensuring that work is always performed in full compliance with the contractual and regulatory frameworks of the respective country. IGOR guarantees that **salaries** are always aligned with the grading levels established by national or territorial collective agreements, ensuring fair and proportionate remuneration in relation to the quantity and quality of the work performed. In this regard, IGOR is committed to providing **fair and competitive salaries** that align with employees' skills, experience and prevailing market practices. Furthermore, IGOR is committed to promoting the internal implementation of a **corporate welfare** programme, designed to support the health and well-being of the Group's employees. Finally, the Group promotes a **healthy work-life** balance, supporting time management to reconcile professional and private needs, while respecting the psychological and physical health of employees.

### Health and Safety

IGOR is committed to guaranteeing and maintaining a **safe and secure working environment** for all its employees, fully complying with the provisions of Legislative Decree 81/2008 and applicable occupational health and safety regulations. The Group takes preventive and corrective measures **to eliminate or minimise risks**, with the aim of protecting the health of its employees. Furthermore, IGOR promotes a safety culture, raising awareness among workers and encouraging responsible behaviour through transparent communication and continuous training. IGOR provides staff with the necessary information and tools to ensure a high level of awareness of risks and security measures. The company implements technical and organisational measures to minimise





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workplace risks for the protection of employee health and safety. Each employee is responsible for their own safety and the safety of others by following the instructions and safety measures provided.

## Non-discrimination, equal treatment and opportunities for all:

IGOR is committed to ensuring **equal employment opportunities** and professional advancement for all employees, based exclusively on competence, merit and ability, **without discrimination** based on race, religion, gender, age, sexual orientation, political or trade union membership, in full compliance with current laws and regulations. The relevant functions are responsible for **selecting, recruiting, and managing** employees based on these criteria, ensuring fairness, transparency, and the appreciation of **diversity**. Moreover, decisions regarding **salaries** and **promotions** are always focused on recognising professional skills and accomplishments. IGOR promotes a respectful working environment where every individual is treated with dignity and without prejudice, ensuring that authority is exercised with fairness and propriety in the hierarchical relationships. The Group implements measures to prevent any behaviour that is offensive, marginalising or harmful to the dignity of employees, while also ensuring that the working environment is safe, free from harassment and undue influence, where everyone can realise their full potential in an inclusive and respectful atmosphere.

## Training and Skills Development

IGOR is committed to enhancing the **professional skills** of its employees, recognising that individual growth is fundamental to the company's success. The Group promotes **continuous training** to strengthen both technical and transversal skills, ensuring that all employees have equal opportunities for learning and development, free from discrimination. IGOR is committed to creating an **inclusive environment** where each employee can pursue professional growth opportunities, guided by merit and individual



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needs. Training is regarded as a fundamental tool for supporting adaptation to change and fostering innovation. IGOR is committed to providing targeted development programmes that address market challenges and business needs, ensuring that all employees, regardless of their position or background, have access to growth opportunities. In this way, the Group strengthens its human capital, contributing to the success of the company while fostering the development of each individual's potential.

## Active Participation and Social Dialogue

IGOR undertakes to guarantee all employees the right to freely elect their trade union representatives, in full compliance with current legislation and the National Collective Labour Agreement (CCNL). The company ensures that these representatives are free from discrimination and can communicate openly with employees, fostering an environment of open and constructive dialogue. The Group recognises social dialogue as a fundamental tool for improving business practices and strengthening a working environment based on trust and transparency. IGOR supports collective bargaining by ensuring that notices from national trade unions are prominently displayed on the notice board, making them accessible for all employees to view. The Group believes that ongoing and inclusive dialogue is essential for building a participatory governance model focused on continuous improvement.

## Condemnation of Violence and Harassment in the Workplace

IGOR adopts a **zero-tolerance** policy towards all forms of **violence and harassment** in the workplace, emphasising that mutual respect and personal dignity are fundamental to a safe, inclusive and harmonious working environment. The company **strongly condemns and** opposes any kind of harassment, whether physical, verbal, visual, psychological, discriminatory or sexual, and opposes any behaviour that creates a denigrating, hostile, humiliating, intimidating, offensive or unsafe environment. To





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safeguard its employees, IGOR implements preventive measures and fosters a corporate culture rooted in integrity and mutual respect.

## Privacy Protection

IGOR is dedicated to **protecting the privacy and personal data of its employees**, taking all necessary measures to prevent misuse of information. Personal data is processed in accordance with **Legislative Decree. 101/2018**, which transposed Italian law from **Regulation (EU) 2016/679 (GDPR)**, ensuring that data is collected and processed for specified, explicit and legitimate purposes. The Group ensures that data is retained only for as long as necessary to achieve the purposes for which it was collected and implements adequate preventive measures to mitigate the risk of destruction, loss, or unauthorized access. IGOR also commits to ensuring that all personal data processing operations are conducted lawfully, fairly, and transparently, with full respect for the rights of the individuals concerned. To this end, the Group is committed to adopting internal procedures and advanced technologies to protect data security and prevent any unauthorised or unlawful processing, in line with current legislation.



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## 4. Policy Implementation and Monitoring

To ensure the effective implementation and ongoing compliance with the Workforce Policy, IGOR has established a structured process that ensures the consistent application of the fundamental principles within the Group. The process is geared towards fostering the well-being and development of individuals and an inclusive and respectful corporate culture. The main elements of the implementation process are outlined as follows:

### Responsibilities of Internal Recipients

Compliance with the Workforce Policy is an obligation shared by all employees and area managers. Any violation of the principles outlined in the Policy will be addressed through disciplinary action, in compliance with applicable laws and collective agreements. Department heads are responsible for continuously monitoring the application of the Policy within their areas of responsibility, fostering an inclusive and respectful work environment, where employees' rights are consistently protected daily.

### Reporting Tools

IGOR has established a whistleblowing procedure accessible to all Recipients, enabling them to **safely and anonymously report** any potential violations of the Policy. This tool is a key element of the implementation process, as it contributes to building of a corporate culture based on transparency, accountability and respect. Every report will be treated with the utmost seriousness and urgency, ensuring the preservation of a working environment where the rights and dignity of all persons are always protected.





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## 5. Policy Dissemination

The **Human Resources** Department is responsible for disseminating the Workforce Policy within IGOR, ensuring that all employees fully comprehend the principles it contains. In addition, the Policy is made available to all employees in printed format, ensuring visibility and ease of reference. To ensure a comprehensive understanding of the issues addressed, including workers' rights, the Policy will be distributed to all employees. Furthermore, IGOR will implement a continuous training programme focused on Diversity and Inclusion, aiming to raise employee awareness and strengthen the corporate culture by promoting respect, inclusion, and the well-being of all individuals.

This Document was approved by the IGOR Board of Directors on *15 November 2024* and is regularly updated to ensure alignment with evolving regulations and legal developments. Any revisions or amendments are subject to the approval of the Board to ensure that the content remains current and aligned with industry best practices.

Finally, the Policy is publicly available at [Gorgonzola DOP Dolce e Piccante | IGOR Gorgonzola Novara](#), ensuring maximum transparency and accessibility to all stakeholders. Furthermore, to gather stakeholders' opinions and suggestions regarding the Policy and to promote continuous improvement, all Addressees are encouraged to share their feedback and proposals for updates by contacting the following email address: [giulialeonardi@igornovara.it](mailto:giulialeonardi@igornovara.it). Comments and observations received will be carefully considered during the periodic review of the Policy, with the aim of ensuring that the Document reflects IGOR's commitments to its workforce.

Signature

  
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15/11/2024