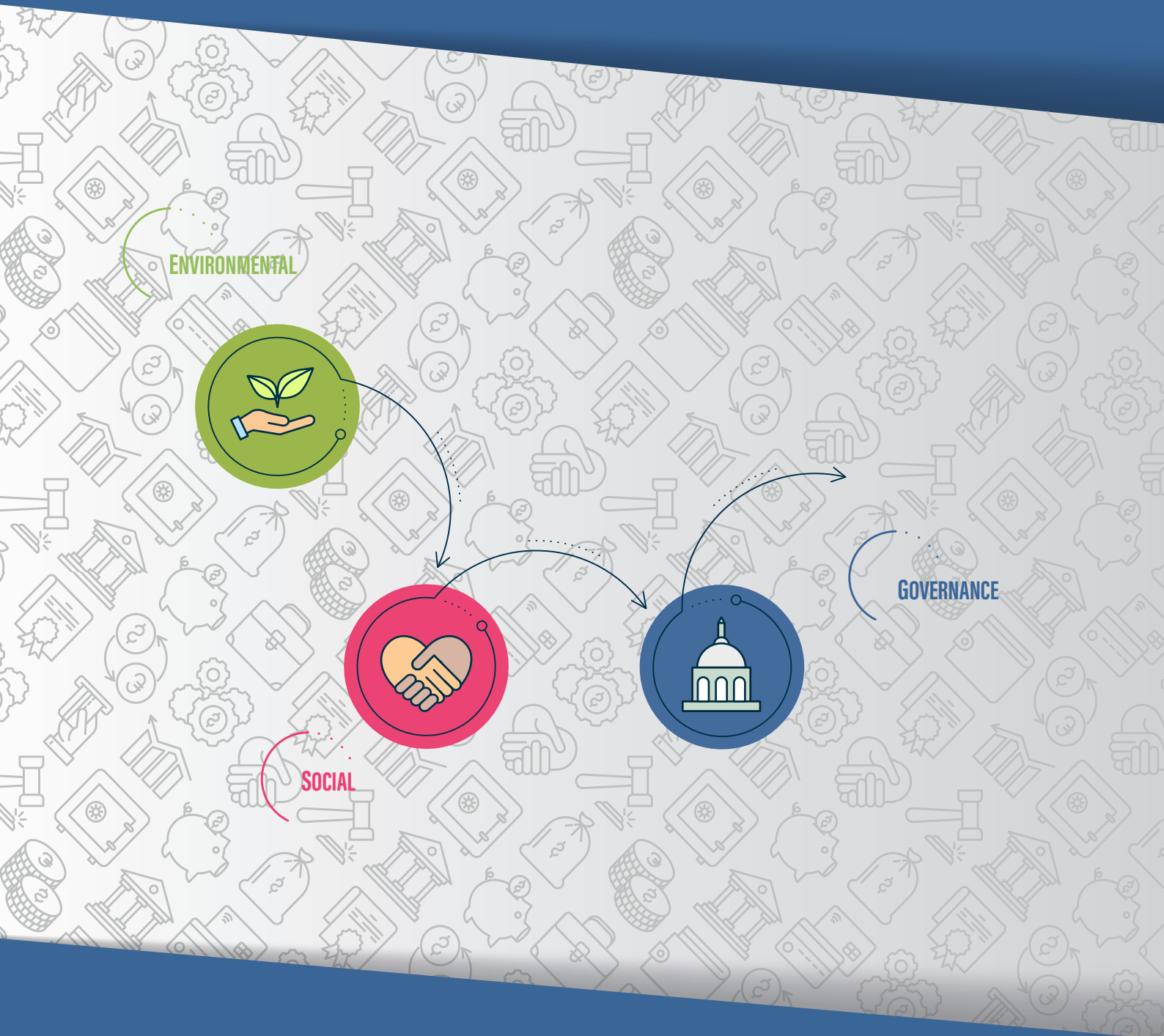


ANTI-CORRUPTION POLICY

openjobmetis





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1. The commitment of Openjobmetis Group

Openjobmetis Group (hereinafter also the “Group” or “Openjobmetis”), including the Parent Company Openjobmetis S.p.A. and its subsidiary companies, believes in the importance of ethical integrity, transparency, and fairness in relations with third parties (both public and private) as fundamental prerequisites for the development of business relations that are sustainable over time and profitable for the Group. In carrying out its activities, the Group adopts a zero-tolerance approach towards corruption and commits to respecting the highest professional and ethical standards in the context in which it operates.

This policy aims to provide a systemic reference framework for the principles and practices adopted by the Group in the fight against active and passive corruption, strengthening what is already stated in the Group’s Code of Ethics. The document, in force since 2012, aims to outline the conduct and core values of Openjobmetis: integrity, fairness, transparency, responsibility and honesty, principles that inspire the Group daily in carrying out its business. In order to build and maintain a relationship of collaboration, respect and trust with all interlocutors, it formally became the Group’s Code of Ethics in December 2022.

2. Definition of Corruption

Openjobmetis identifies as “corruption” the granting, soliciting, promising, indulging or paying sums of money, even small amounts, or other benefits in order to obtain or retain an interest or an advantage for the Group, facilitate a bureaucratic procedure, as well as influencing the achievement of an undeserved objective. Any form of abuse of one’s own or others’ role/authority to obtain undeserved advantages for oneself or for others, whether in terms of money, gifts, loans, fees, hospitality, services, discounts, the assignment of a contract or any other consideration able to influence a commercial or institutional counterpart, can therefore be defined as corruption.

3. Scope and references used

This policy applies to all Group companies and to all those who, either directly or indirectly, permanently or occasionally, work with or for the Group, to third parties who have contractual relationships with Openjobmetis or who represent the Group without employment ties (for example, consultants and other independent collaborators), as well as to all individuals who interact with the Group in various ways (collaborators, consultants, suppliers, customers, outsourcers, etc.). Openjobmetis expects the recipients of the policy to comply with the principles contained herein, by reporting any or suspected violations on the subject.

The Group's approach to corruption, formalised in this policy, complies with the national laws and regulations, as well as with the relevant international principles, regulations, and standards, including, by way of example but not limited to, the OECD Convention of 17 December 1997 on the corruption of public officials of the European Union.

4. Principles of conduct of Openjobmetis Group

Openjobmetis Group undertakes to respect the values of integrity, honesty, fairness, and good faith, as well as transparency and correctness of information, and to apply the following principles of conduct in managing its activities in order to prevent and counteract potential corruptive behaviours.

○ Relations with Public Officers

Openjobmetis behaves with fairness and transparency in commercial negotiations, in participating in public procedures, in the management of administrative requirements and in any other activity involving Public Officials. The Group forbids the payment of sums of money, even small amounts, or other benefits in favour of public officers or people in charge of a public service, or to their relatives up to second degree, except in the case of gifts or utilities of modest value and/or which have a symbolic value and/or are part of normal business courtesy. By public officers we mean persons belonging to Public Administration, Public Bodies, the Public Supervisory Authority and/or similar persons from the Italian State, the European Communities and foreign States.

○ **Relations with Third Parties other than Public Officers**

The relationships that Openjobmetis maintains with third parties are based solely on criteria of professionalism, integrity, respect for the rules of impartiality and fair competition and therefore are only established with Third Parties with a proven reputation for honesty and fairness. Openjobmetis prohibits and does not tolerate the use of illegal behaviour, such as offering or receiving money or other benefits to/from third parties to obtain/keep business or give the Company an unlawful advantage. Recipients of this policy are required to comply with the principles contained herein and avoid personal and/or Group involvement in any type of corrupt behaviour (transactions, activities and relationships with third parties that could lead to criminal charges and corporate liability).

○ **Attribution and management of professional assignments to third parties**


Openjobmetis considers it essential that the attribution of professional assignments to third parties, as well as the management of such assignments, takes place in full transparency and only in compliance with professional standards. As committed in this manner, the Group therefore expects persons to act in accordance with the applicable laws and regulations in business relations with Openjobmetis as well as with this policy, in order to avoid any type of corrupt behaviour. Openjobmetis reserves the right to suspend or terminate a business relationship if it believes or suspects that the Third Party is involved in acts of corruption.

○ **Selection, hiring and management of Human Resources**

Openjobmetis is committed to building loyal and transparent professional relationships. All employees and collaborators are informed about the rights, duties and obligations deriving from contract stipulation. In the phases of selection and hiring of direct and contract staff, Openjobmetis adopts as exclusive evaluation criteria the right matching of the candidates' profiles to the needs of the Group and users and the verification of their professional skills.

○ **Donations, sponsorships, gifts and giveaways**

Openjobmetis prohibits any form of gift for the benefit of third parties which may be interpreted as exceeding normal commercial or courtesy practices, or which may appear as being aimed at acquiring preferential treatment in the management of activities relating to the Group.



In order to prevent corrupt behaviour, donations, sponsorships, gifts and gratuities must be given in compliance with the laws in force and the internal rules of the Group and must be adequately documented to allow for the appropriate checks. There must also be a direct and easily identifiable link between all gifts and hospitality offered, provided or received, which are always forbidden if they consist of cash or equivalent (cheques, loans, shares) or violate any applicable law or regulation. The provision of sponsorships, donations, gifts or other benefits is subject to approval according to specific authorisation levels and preliminary assessment.

○ Bookkeeping and accounting records


Openjobmetis believes that transparency and the keeping of accounting records based on the principles of truthfulness, completeness, clarity, precision, accuracy and compliance with current legislation are the fundamental prerequisites for effective control. Each transaction and operation must be recorded and archived with adequate supporting documentation to allow for simple accounting entries, the reconstruction of the operation and the identification of any responsibilities, guaranteeing transparency, integrity and reliability to its stakeholders.

5. Implementation of the policy

Openjobmetis is responsible for ensuring the correct adoption of this policy by its employees as well as its implementation and control.

The Senior and Top Management of the Group are responsible for promoting a corporate culture against any form of corruption, as well disseminating the principles of conduct contained in this policy and monitoring their application.

Openjobmetis encourages all recipients of the policy in question, in accordance with company policies and procedures, to report through specific dedicated channels any suspicion of attempted, definite or presumed corruption, as well as any alleged or definite violation.

A decorative header at the top of the page features a blue background with a pattern of white line-art icons. These icons represent various business and financial concepts, including gears, briefcases, documents, currency symbols, and hands shaking.

This policy is disclosed within the organisation via a special internal communication and publication on the company website. It is also made available on the websites of the Group companies, which can be accessed by all relevant stakeholders.

Approved by the Board of Directors of Openjobmetis S.p.A. on 4 February 2022 and updated on 2 February 2023 subject to the favourable opinion of the Control, Risks and Sustainability Committee of Openjobmetis S.p.A. and on the same date adopted by the individual subsidiary companies by deed of their respective legal representatives.



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The right people.

Family Care 
Badanti con il cuore.

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