

# COMMUNICATION POLICY

Guidelines for an inclusive communication

 openjobmetis

ENVIRONMENTAL



SOCIAL



GOVERNANCE



<b>1. The Commitment of Openjobmetis Group</b> .....	<b>3</b>
<b>2. Scope and references used</b> .....	<b>3</b>
<b>3. Principles of conduct in communication</b> .....	<b>4</b>
<b>4. Implementation of the policy</b> .....	<b>6</b>




## 1. The Commitment of Openjobmetis Group

Openjobmetis Group (hereinafter also the “Group” or “Openjobmetis”), including the Parent Company Openjobmetis S.p.A. and its subsidiaries, operates with the belief that correct and effective communication is the foundation for a relationship with its stakeholders based on collaboration, clarity of intent and efficient transfer of information, as well as fundamental for the company’s reputation. The Group is committed to promoting inclusive communication, based on a communication strategy closely related to the use of textual or audiovisual language, which allows for non-discrimination between interlocutors and is free of cultural stereotypes and prevents incorrect language that may emphasize elements such as gender, disability, sexual orientation or skin colour as dominant and characterizing elements of a person.

This policy aims to provide a reference framework of the principles and practices adopted by the Group in communication methods at all levels with its stakeholders, reinforcing what has already been stated in the Code of Ethics. The document, in force since 2012, aims to outline the conduct and key values of Openjobmetis: integrity, correctness, transparency, responsibility and honesty, principles which the Group draws inspiration from on a daily basis in carrying out its business. To build and maintain a relationship of collaboration, respect and trust with all interlocutors, from December 2022 it also formally became the Group’s Code of Ethics.

## 2. Scope and references used

This policy applies to all direct employees of Group companies and to all forms of communication (verbal and written), methods (paper and digital) and areas (by way of example but not limited to, formal meetings, informal meetings, participation to events, advertising, recruitment announcements and personnel selection) and towards all stakeholders (by way of example but not limited to, customers, suppliers, investors, administrators, collaborators).



Openjobmetis expects the contents included in the policy to be also applied by all those who, either directly or indirectly, permanently or occasionally, operate with or for the Group.

The Group also expects the recipients of the policy to adapt to the principles contained therein, reporting any or suspected violations in this regard.

The contents of this policy are also inspired by international standards and voluntary initiatives to which Openjobmetis refers in its daily operations including, by way of example and not exhaustively, the Italian law Dir. 23 May 2007 then Dir. 26 June 2019 Measures to implement equality and equal opportunities between men and women in public administrations; European Indications Guidelines (2009) and Gender neutrality in language manual (2018) of the European Parliament, Istanbul Convention (2011) of the Council of Europe.

### 3. Principles of conduct in communication

Communication is one of the areas in which stereotypes and prejudices can be produced and conveyed, consciously or unconsciously. Communication in all its forms (audiovisual, iconic, verbal, gestural) can contribute to consolidating or exasperating asymmetries already present in society, but it can also contribute positively to modifying and counteracting stereotypes and customs. Openjobmetis adopts specific attention in the management of internal and external communication to the Group companies with different methods, tools and forms based on the content of the communication and the recipients, in order to pursue effectiveness and communication clarity. The Group adopts dedicated procedures to ensure compliance with the following principles:

#### ○ Compliance with regulations

Openjobmetis bases its communication on the basis of regulatory requirements, ensuring compliance with the necessary requirements, where existing and applicable.

#### ○ Language used

Openjobmetis believes it is essential that its communication is based on an effective and at the same time respectful, neutral, inclusive language, which contributes to breaking down stereotypes and







### ○ Communication planning

Openjobmetis deems it necessary to plan its communication - with reference to institutional and advertising communication - by preparing a specific Communication Plan of its commitment to the issues of gender equality and, more generally, to D&I summary of the various communication actions, identifying contents, tools and recipients. This Plan is drawn up on the basis of the different internal and external needs collected through discussion with the various company representatives.

### ○ Communication review and monitoring

Openjobmetis works to ensure that communication, in its various forms and methods, is consistent with the principles of this policy and that internal and external communication is aligned with company values and culture. It therefore identifies dedicated and specially trained staff to support internal staff in carrying out the communication, also reviewing the communication texts if necessary and intervening in cases where the proposed or implemented communication does not comply with the company's principles.




## 4. Implementation of the policy

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

The Senior and Top Management of the Group are responsible for promoting a corporate culture based on the principles contained in this policy, as well as disseminating and monitoring its application.

Openjobmetis encourages all recipients of the policy in question to report, in accordance with company policies and procedures, through specific dedicated channels, any suspected or definite violation and encourages all recipients to provide ideas and suggestions, even anonymously, to encourage improvements and changes towards the strengthening and development of D&I. Please refer to the Reporting Policy, the "contacts" section on the company websites to submit a complaint and the use of the dedicated area accessible from the intranet portal for direct staff to report incidents of non-inclusiveness and proposals for improvement in the D&I area.



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

Defined in consultation with the Steering Committee for Gender Equality and approved by the Board of Directors of Openjobmetis S.p.A. on 29 September 2023 following the favourable opinion of the Control, Risk 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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