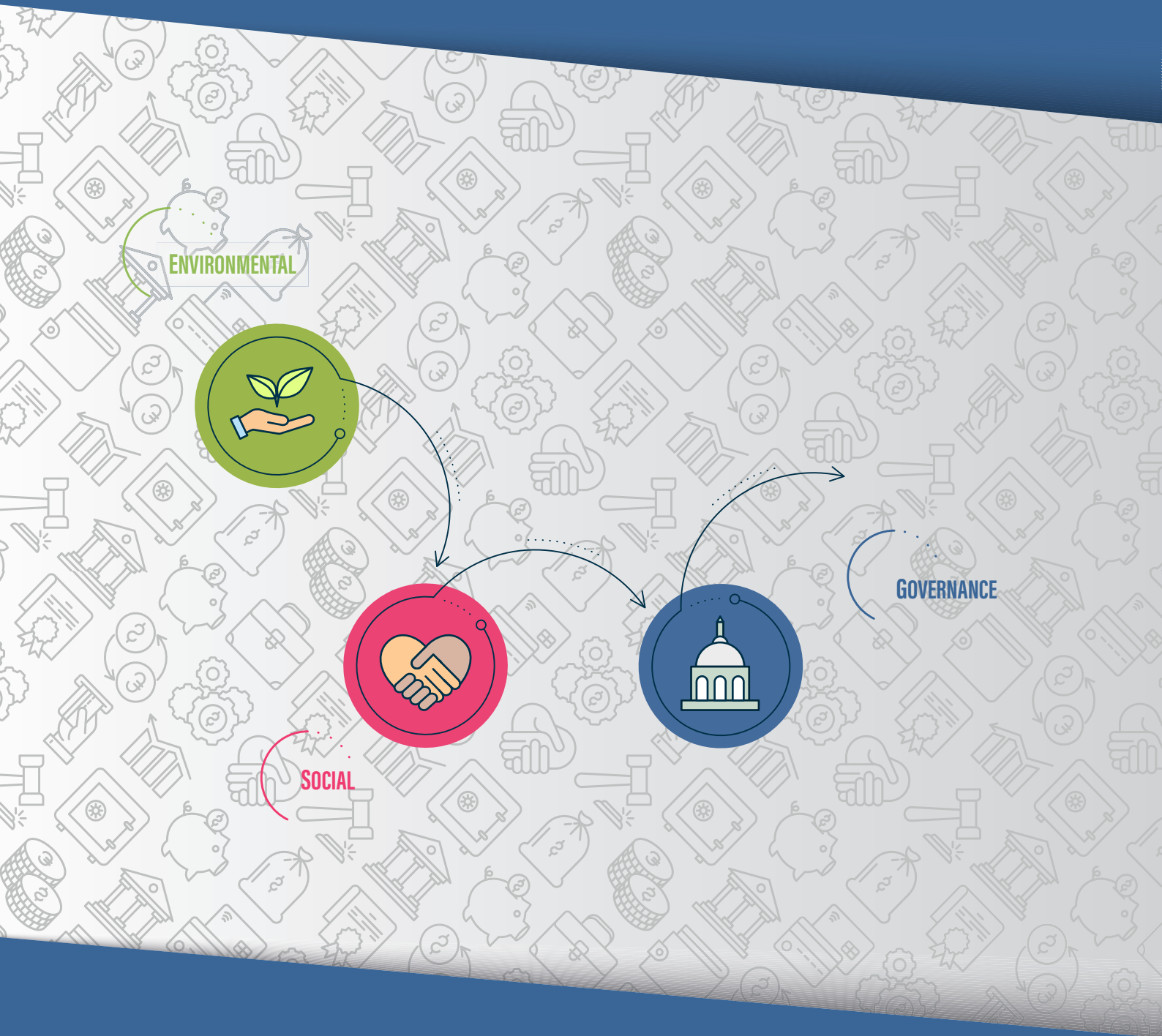


SUPPLY CHAIN MANAGEMENT POLICY

openjobmetis





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1. The Commitment of Openjobmetis Group

The Openjobmetis Group (hereinafter also the “Group” or “Openjobmetis”), including the parent company Openjobmetis S.p.A. and its subsidiaries, recognizes the importance of adopting responsible procurement practices in accordance with corporate principles and values.

The Group considers the sharing and respect for corporate principles, culture and values by commercial partners in the supply chain an essential element for implementing a solid and lasting collaboration relationship.

Openjobmetis requires its Suppliers to have suitable levels of professionalism and demands ethical conduct, fairness in negotiations and legality, with reference to the laws protecting industrial and intellectual property, the laws protecting the consumer, free competition and the market and the laws against money laundering, corruption and organized crime.

For this reason, the Group, in choosing its Suppliers, is committed to finding the right balance between economic advantage and quality of service, without preventing any supplier company, if in possession of the required requisites, from having the opportunity to compete to win the supply, and maintain an open and collaborative dialogue with the companies, in line with good commercial practices and at the same time guarantee fair and honest competition between Suppliers.

This policy aims to provide a reference framework for the commitments and principles of conduct adopted by the Group in guaranteeing responsible and sustainable procurement practices, reinforcing what has already been outlined in the Group’s Code of Ethics. This 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 on a daily basis in carrying out its business. It also formally became the Group’s Code of Ethics in December 2022 in order to build and maintain a relationship of collaboration, respect and trust with all interlocutors.



2. Scope and references used

This policy applies to all Group companies and to all Suppliers identified as “all those who, directly or indirectly, permanently or occasionally, work with or for the Group, to third parties who maintain contractually regulated collaboration agreements with Openjobmetis or who represent the Group without employment ties (for example, consultants and other independent collaborators), as well as to all persons who interact in various ways with the Group (collaborators, consultants, suppliers, outsourcers, etc.)”.

Openjobmetis expects that what is outlined in this document will also be applied by any subcontractors.

Openjobmetis expects recipients to comply with the commitments and principles of conduct formalized in this policy and report any or suspected violations in this regard.


All recipients of this policy are therefore required to implement sustainable behaviour and positively contribute to the Group’s objective of managing its supply chain in the best possible way and responsibly.

Openjobmetis Group, within the framework of a responsible selection and management approach to its Suppliers, formalized in this policy, requires its partners to adopt a high standard of behaviour, provide a high quality of goods or services and comply with laws and national regulations, as well as the principles, regulations and international standards of reference, including, by way of example but not limited to, the principles of the Global Compact to which it adheres, and the 2030 Agenda for Sustainable Development of the United Nations and the related “Sustainable Development Goals”.



3. Principles of conduct in promoting a responsible supply chain

Openjobmetis undertakes to respect the values expressed in its Group Code of Ethics and to apply the following principles of conduct in carrying out its activities to ensure a responsible and sustainable procurement of goods and services and to create synergies in line with the service offered.



The Group expects Suppliers and sub-suppliers to assume the same commitments along the entire supply chain.

○ Compliance with laws and regulations

Openjobmetis ensures full compliance with the laws and regulations in force and expects its Suppliers to adopt behaviours in line with this commitment. In this regard, the Parent company Openjobmetis S.p.A. has adopted specific internal safeguards also within the framework of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, applied, as compatible, by its subsidiary companies.

Furthermore, Openjobmetis requires Suppliers to behave in compliance with the Anti-Corruption Policy and the Privacy Policy defined by the Group and available on the websites of the Group companies.

○ Transparency and impartiality

The Group adopts objective and transparent assessment criteria in the selection, choice and management of Suppliers, based on a documented procedure which guarantees impartiality and equal opportunities for all parties involved. For Suppliers with a turnover level exceeding a predetermined threshold and for those who offer services/products for which technical-enabling requirements are required, the Group also adopts an accreditation process.

Relations with Suppliers must always be based on respect for the principle of transparency. For this purpose, the Group's partners are required to ensure maximum fairness and guarantee the exchange of truthful and correct information to be able to correctly manage any situations of conflict of interest.

○ Fair negotiation

Openjobmetis maintains fair and loyal relations with its Suppliers, opposing illegal practices and behaviour, attempts of any form of corruption, favouritism and soliciting of personal advantages and any conduct contrary to laws in force and the rules defined by this policy.



○ Protection of workers in the supply chain

Openjobmetis considers it essential that Suppliers adopt legal and ethical behaviour that respects internationally recognized standards and principles regarding the treatment of workers, with particular regard to the protection of fundamental human rights, the prohibition of discrimination, the protection of children and of child labour, the regularization of employment relationships also in relation to collective bargaining, disciplinary rules, the prohibition of forced labour, the protection of trade union rights, the protection of health and safety in the workplace, compliance with working hours and maximum working hours established by law and one's own CCNL¹, freedom of association, the guarantee of acceptable living conditions, minimum subsistence wages and the principle of fair pay.

Furthermore, the Group considers it important that all its Suppliers do not make use of the work of resources from outside the EU who do not hold a residency permit, as established by current legislation on immigration.

○ Environmental protection in the supply chain

Openjobmetis requires Suppliers to behave in compliance with the Environmental Policy defined by the Group and available on the websites of the Parent Company Openjobmetis S.p.A., which expresses the Group's commitment to respect and protect the environment. It expects its Suppliers to behave proactively in environmental matters. In the selection of its Suppliers and in the accreditation process, weight is also given to elements that demonstrate commitment to the environment, such as the obtaining of recognized environmental certifications.

○ Confidentiality

Openjobmetis, being aware that confidentiality is a fundamental principle for the protection of the Group and its activities, guarantees the correct management of the information acquired during its relationship with Suppliers. Likewise, it requires them to adhere to this principle in turn, possibly through the signing of a confidentiality agreement.

¹ Maximum working hours are established by collective labour agreements; the average duration of working hours cannot in any case exceed 48 hours for each seven-day period, including overtime hours. Source: *Ministry of Labour Social Policies*.



○ Supply chain monitoring

Openjobmetis undertakes to adopt internal procedures for monitoring the process for the search, selection and contracting of Suppliers, as well as an analysis of Supplier performance and maintenance of requirements over time. At the same time, the Group adopts internal controls for monitoring any situations of conflict of interest.

4. 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 support a corporate culture based on the commitments contained in this policy and contribute to the dissemination and monitoring of its application.

Openjobmetis encourages all recipients of the policy in question, in accordance with company policies and procedures, to report any suspected or definite breach through the specific dedicated channels. Please refer to the Reporting Policy and to the “contacts” section on the company websites to file a complaint or report.

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.

Approved by the Board of Directors of Openjobmetis S.p.A. on 02 February 2023 and updated on 20 February 2024 subject to 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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