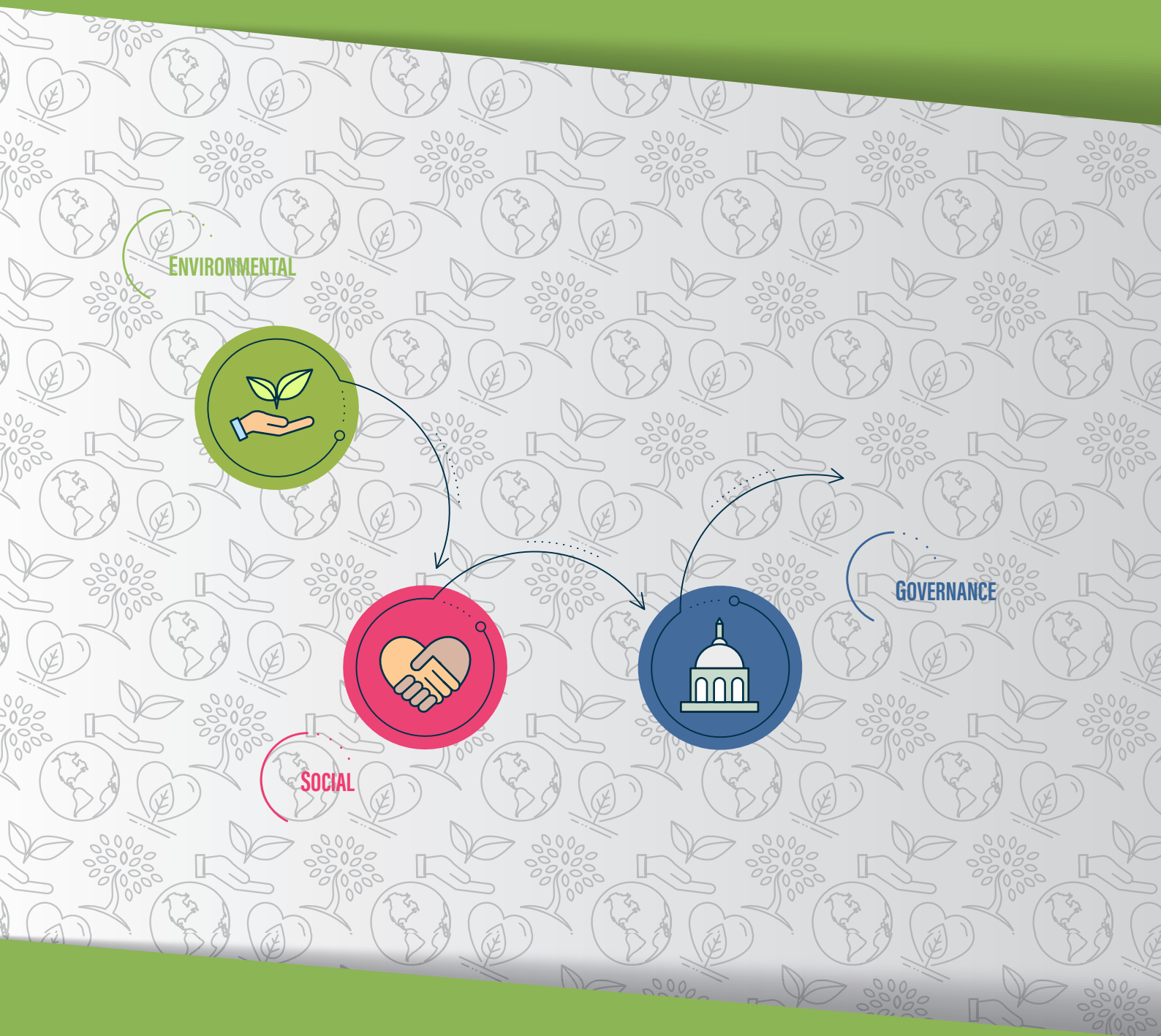


ENVIRONMENTAL POLICY

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 subsidiaries, recognizes the importance of protecting the environment, a fundamental resource for the community and future generations.

Each company of the Group considers environmental protection a fundamental objective and undertakes to ensure that the regulations in its defence are constantly respected. They are also aware of the environmental impacts of their activities and therefore undertake to monitor and manage processes and operations to reduce, where possible, the negative effects generated on the external environment and the ecosystem.

Openjobmetis aims to promote an environmentally friendly approach through fruitful management of relations with the various stakeholders.

In particular, it undertakes to create awareness and motivate employees to personally take responsibility for respecting the environment in their daily work activities, through the promotion of good practices.

This policy aims to provide a reference framework for the commitment and principles of behaviour adopted by the Group for respecting the environment, reinforcing what is already outlined 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 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 those who work with or for the Group, directly or indirectly, permanently or occasionally, to third parties who have a contractually regulated collaboration relationship 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 recipients to comply with the commitments and principles of conduct formalized in this policy by reporting any or suspected violations on the matter. In carrying out their activities, it is necessary that the recipients undertake to implement sustainable behaviours, using the available resources efficiently.

All recipients of this policy are therefore required to mitigate and control their impact on the environment by pursuing the objective of managing their activities in the best possible way with a view to reducing negative impacts and promoting environmentally friendly behaviour.

The approach of Openjobmetis in respecting the environment, as formalized in this policy, complies with national laws and regulations, as well as with the principles, regulations and international standards of reference, including, by way of example but not limited to:

- *Legislative Decree 3 April 2006, n. 152 ("Environmental regulations") with particular regard to cases relating to energy consumption, the use of natural resources and emissions into the atmosphere;*
- *Legislative Decree 30 April 2022, n. 36 ("Further urgent measures for the implementation of the national recovery and resilience plan (PNRR)") with particular reference to the measures for the implementation of the national recovery and resilience plan in the fields of the environment, renewable sources, energy efficiency and health;*
- *the 2030 Agenda for Sustainable Development of the United Nations and the related "Sustainable Development Goals";*
- *the United Nations Global Compact (2000) with particular reference to the following principles:*
 - PRINCIPLE VII: companies are required to support a preventive approach to environmental challenges;

- PRINCIPLE VIII: companies are required to undertake initiatives that promote greater environmental responsibility;
- PRINCIPLE IX: companies are required to encourage the development and diffusion of technologies that respect the environment.

Finally, Openjobmetis supports the Rio de Janeiro Declaration on the Environment and Development of 1992, in particular, the precautionary principle (n. 15)¹.

3. Principles of conduct for the respect and protection of the environment

Openjobmetis undertakes to respect the values of legality, environmental protection and respect for the community and to apply the following principles of conduct in carrying out its activities in order to predict, prevent or mitigate its environmental impact.

○ Compliance with laws and regulations

Openjobmetis ensures full compliance with current environmental laws and regulations. For this purpose, it identified the Head of the Internal Audit Function as the person in charge of identifying environmental legislation and analysing its applicability to Group companies, making sure that the companies adopt suitable tools to monitor environmental risks. 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 the subsidiary companies.

○ Efficient use of natural resources

Openjobmetis undertakes to adopt effective solutions with a reduced environmental impact to make energy consumption more efficient in its activities and to reduce the consumption of natural resources, such as, by way of example but not limited to, digital solutions to dematerialise paperwork and procedures.

¹ "In order to protect the environment, the States will largely apply, according to their capabilities, the precautionary method. In the event of a risk of serious or irreversible damage, the absence of absolute scientific certainty must not serve as a pretext for deferring the adoption of adequate and effective measures, even in relation to costs, aimed at preventing environmental degradation".



○ Responsible waste management

Openjobmetis manages the production and disposal of waste in a responsible manner, resorting where necessary to suppliers authorized for correct disposal in accordance with the law. It also undertakes to reduce the purchase and use of products made from polluting materials in favour of certified materials with low environmental impact.

○ Reduction of environmental impact

Openjobmetis adopts suitable measures to reduce its carbon footprint. For example, to limit the emissions relating to employee travel, Openjobmetis encourages the use of vehicles with a low environmental impact. For this purpose, the Group has set up a Mobility Manager to promote and carry out activities for the organization and management of the mobility necessary for staff resources, both for travel required to carry out work activities and that required for reaching the workplace. Furthermore, as part of the Group's commitment to reduce its environmental impact, in 2021 the company Lyve achieved Carbon Neutral certification for all the training services delivered via its digital platforms in order to offset the CO₂ produced by use of online courses and classrooms.

○ Communication

Openjobmetis considers internal and external communication an effective tool for spreading a culture and awareness of everyone's environmental role and undertakes to promote effective communication on environmental issues to all stakeholders.

○ Responsible sourcing

Openjobmetis is committed, in line with the provisions of its Supply Chain Management Policy, to responsible purchasing, both through checks relating to product requirements and by sourcing preferably from manufacturers and/or resellers who share the values of respect and protection of the environment.

○ Continuous improvement

Openjobmetis monitors the Group's environmental performance and adopts programs for its improvement by periodically communicating information relating to the performance, commitments and environmental objectives taken.



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.

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

Openjobmetis encourages all recipients of the policy in question to report, in accordance with company policies and procedures, any suspected or definite breach through specific dedicated channels.

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 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 2 February 2023 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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