HUMAN RESOURCES MANAGEMENT POLICY

penjobmetis













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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, puts people at the centre of its business in its operations, and believes that its success is largely based on the added value given by the synergy of those who work within it. The relationship between Openjobmetis and its direct staff is based on the promotion of social, economic and employment development, as well as the respect and protection of human rights.

This policy aims to provide a reference framework for the principles and practices adopted by the Group in its relations with human resources, with reference to direct staff (the relationship with contract employees is governed by the "Policy on the Management of Contract Employees"), throughout the entire career path of people in the Group, reinforcing what was already reported in the 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.

The commitment of Openjobmetis Group is manifested in all phases of the relationship with its Human Resources - from recruitment to termination of the employment relationship - and in all areas of interest: search, selection and hiring, career management and training, internal mobility and succession, payments, benefits and incentives, health and safety, parenting, work-life balance, conflict management, welfare, termination of the employment relationship, harassment in the workplace.

2. Scope and references used

This policy applies to all direct employees of Group companies.

Openjobmetis expects the contents of the policy to also be applied by all those who directly or indirectly, permanently or occasionally, work with or for the Group.

The Group also expects the recipients of the policy to follow the principles contained herein and report any suspected violations on the matter.

In drafting this policy, national laws and regulations were taken into consideration, with particular reference to labour law regulations, as well as to the CCNL trade and tertiary national collective agreement. The contents of this policy is also inspired by international standards and voluntary initiatives that Openjobmetis refers to in its daily operations including, by way of example but not limited to, the United Nations Guiding Principles on Business and Human Rights, the declaration of the International Labour Organisation (ILO) on fundamental principles and rights at work¹, the International Charter of Human Rights and the United Nations'² "Sustainable Development Goals" and the Reference Practice UNI PDR 125/2022 - Guidelines on the Management System for Gender Equality.

3. Principles of conduct in relations with direct staff

Openjobmetis adopts legal and ethical behaviour in managing relations with its direct staff, in compliance with internationally recognised standards and principles regarding the treatment of workers, as indicated below. It also adopts specific operation procedures describing the methods with which to operate in compliance with the principles set out.

O Protection of human rights

Openjobmetis promotes and supports respect for human rights in its organisation and in its business relations and acknowledges this principle as an essential factor in its operations.

The Code of Ethics is based on the fundamental values and principles underlying the reputation of

¹ International Labour Organisation - ILO.

² United Nations, "Universal Declaration of Human Rights", General Assembly Resolution 217 A, December 1948.

the Openjobmetis Group which inspire its daily operations. It also describes the fundamentals of the employment relationship, such as diligence, trust, standards of behavior required of all employees and collaborators and respect for people and internal regulations. All employees and collaborator are called to observe a culture of respect for human rights, and everyone is encouraged to engage in monitoring compliance with due diligence and report any shortcomings.

Impartiality in search, selection and recruitment

Openjobmetis does not tolerate and condemns any type of discrimination (based on political and trade union opinions, religion, ethnic group, racial or ethnic origins, nationality, age, gender, sexual orientation, health, marital status, disability, physical appearance, economic and social condition) perpetrated against candidates and opposes the granting of privileges for the same reasons. The entire search, selection and hiring process is based on the promotion of equal opportunities and inclusion and the exclusive evaluation criteria adopted are the matching of the candidates' profiles to the Group's needs and the verifying their professional skills and the verifying of experience, requirements, and skills necessary to fill the vacant position.

O Refusal of slave, child or irregular labour

Openjobmetis does not tolerate any form of slave, child, irregular or undeclared work, nor any other conduct that may, even if only theoretically, lead to illegal action against the person. Workers are also free to withdraw from an employment contract in accordance with national legislation and collective bargaining without fear of retaliation.

O Personal growth and performance evaluation

Openjobmetis is committed to offering its employees equal opportunities in terms of personal and professional development and growth by promoting their skills and facilitating their training in a careful and planned career path. The Group considers professional training a priority and organises a skills development programme for its staff right from their hiring that includes both technical and transversal aspects. At Openjobmetis, the career development of staff is based on an impartial assessment of performance and skills and the recognition of merit. The Group believes it is important to pursue gender balance in corporate leadership positions and is committed to supporting female empowerment and not to discriminate against women in potential management appointments. Human Resources Management is required to ensure the neutrality of personnel development processes.

O Diversity, inclusion, and non-discrimination

Openjobmetis believes in the added value of diversity, consisting of different cultures and experiences. The Group opposes and condemns any kind of discrimination based on difference of language, colour, faith and religion, opinion and political orientation, nationality, ethnicity, age, gender and sexual orientation, marital status, disability and physical appearance, economic and social status. Openjobmetis is committed to fostering a peaceful working environment for all its employees in which the Group's ethical principles and values are respected, and to ensure that its employees and collaborators behave and are treated with dignity and respect. Please also refer to the specific D&I Policy.

O Health, safety and well-being of staff

Openjobmetis is committed to adopting high standards of health and safety in the workplace and to consolidating a culture that is aware of risks and adequate for guaranteeing healthy and hygienic working conditions. The activities of the Group must be carried out in full compliance with current legislation on the prevention and protection from accidents at the workplace.

Freedom of association and right to collective bargaining

Openjobmetis acknowledges the right of its employees to form or take part in organisations aimed at defending and promoting their interests, as well as to be represented by trade union bodies or other forms of representation in compliance with national legal requirements.

Working hours, remuneration and benefits

Openjobmetis undertakes to ensure that its workers receive regular and adequate wages and acts in compliance with the national labour regulations and collective agreements regarding working hours and remuneration for overtime work. and the various remuneration items, including incentive pay. Openjobmetis is committed to ensuring that the recognition of remuneration, assignment of benefits and payment of bonuses is based on merit, skills and experience, guaranteeing equal treatment for the same job/role, regardless of gender, political and trade union opinions, religion, ethnicity, nationality, age, sexual orientation, health status, marital status, disability, physical appearance and economic-social condition. Openjobmetis is also committed to identifying and removing unjustified pay differences, for example between genders (gender pay gap).

Parenting

Openjobmetis believes it is essential to guarantee parents a peaceful and protective working environment, in the belief that parenthood is a time for growth for the person and his/her skills. It is therefore considered useful to prepare specific actions, such as internal communications with clear and useful information for pre- and post-maternity and paternity, projects to support the return to work after maternity and to involve those on leave, welfare actions specifically dedicated to parenting, etc. Openjobmetis takes action to ensure that – in accordance with current regulations – clear information is provided for the use of mandatory and optional parental leave, promoting its full and straightforward use. Mechanisms are also in place to protect jobs and guarantee the same salary level after maternity leave.

O Work-life balance and welfare

Openjobmetis strives for a peaceful work environment in which work and personal life are adequately balanced, with the knowledge that this results in a profitable work environment and widespread organizational well-being. For this reason, the Group promotes work-life balance and welfare projects that consider the different needs of its human resources and of their personal lives.

O Data protection

Openjobmetis recognises the respect for the right to protection of personal data as a priority and adopts appropriate technical and organisational measures to protect the privacy of its employees and natural persons with whom it comes into contact.

Conflict management and harassment in the workplace

Openjobmetis recognizes the importance of a peaceful working environment in which teamwork is enhanced by everyone's contribution and constructive criticism. The Group works to avoid the emergence of conflicts and to manage them if they arise. It also rejects any type of harassment, committing itself to the prevention of all forms of physical, verbal and digital abuse in the workplace. Openjobmetis also works to collect and manage any reports, even anonymous ones, and assigns specific persons to manage these. See the Reporting Policy. At the same time, the company promotes the use of kind, respectful and inclusive language in relationships between people.

Termination of employment

The Group, through the analysis of turnover data and use of a questionnaire to be completed on a voluntary basis, undertakes to investigate the reasons that led to the withdrawal from the employment relationship in order to put people in a position to best express their skills and promote organizational well-being.

Analysis and communication

Openjobmetis recognizes the importance of periodically analysing and disseminating data relating to its human resources through periodic reports. It provides for the analysis and consequent dissemination, with distinction by gender and, where useful, by age group, number of employees per category, turnover, training carried out, recognition of incentives, disabled people, type of contract, working hours of work and gender pay gap indicators. It also believes it is important to inform its human resources on the methods adopted for performance evaluation and the incentive recognition mechanisms.

O Complaints

Openjobmetis adopts mechanisms or managing complaints and reports through specific channels dedicated both to internal staff and to all its stakeholders in general.

See paragraph 4 for the operating methods.

Monitoring

Openjobmetis is committed to monitoring at all levels so that what is expressed in this policy is implemented effectively, also through risk assessment and analysis activities on human resources issues with the aim of correcting any negative impact. In particular, the Group undertakes to monitor and consequently report on impacts on human rights to its stakeholders.

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 are responsible for promoting a corporate culture based on the principles contained in this policy, as well as for the dissemination and monitoring of its implementation.

Please refer to the Reporting Policy and the "contacts" section on the company websites to report an offence or complaint and to report harassment. Please also refer to the area dedicated to direct personnel and accessible from the intranet portal, which provides access to the various reporting channels, including those dedicated to reporting incidents of non-inclusiveness and suggestions for improvement in the D&I area.

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 corporate websites of the various Group companies, which can be accessed by all relevant stakeholders.

Defined in agreement with the Steering Committee for Gender Equality, this Policy was first adopted on September 29, 2023 by resolution of the Openjobmetis Board of Directors and adopted on the same date by its subsidiary companies by deed of their respective legal representatives. Last modified on 28/10/2025.



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